



Amendments to statutory guidance on assessments in lieu of test in Approved Document B (Fire Safety)

Submission of Evidence by CIBSE

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Response:	This response is submitted on behalf of the Institution, which is a licensed Professional Engineering Institution

The Chartered Institution of Building Services Engineers (CIBSE)

1. CIBSE is one of the leading global professional organisations for building performance related knowledge. The Institution and its members are the primary source of professional guidance for the building services sector on the design, installation and maintenance of energy efficient building services systems to deliver healthy, comfortable and effective building performance. Our focus is on adopting a co-ordinated approach at all stages of the life cycle of buildings, including conception, briefing, design, procurement, construction, operation, maintenance and ultimate disposal.
2. CIBSE publishes guidance related to heating, cooling, ventilation, lighting, public health engineering, fire safety and sustainability of building engineering services.
3. The Society of Façade Engineering (SFE) is one of several discipline specific Divisions of the Institution, which was formed in 2004. The Society acts as a focus for those involved in the façade industry and to determine the professional credentials of members. Membership is open to all individuals who have an involvement in façade engineering.
4. The Society of Façade Engineering brings these people together in a forum where they can work together to advance knowledge and practice in facade engineering, promote good practice and ensure that today's increasingly complex building façades meet the many and varying performance criteria. In particular, it addresses the complex issues in building physics of thermal insulation, ventilation, lighting, solar control, and acoustics.

Consultation Response

Question 3. CIBSE agrees with Dame Judith's recommendation. The use of "desktop studies" or assessments in lieu of test is unique to the UK, with virtually no parallel elsewhere in the world. Most other jurisdictions require test data and do not recognise such assessments.

Question 4. CIBSE does not agree with the proposed approach of amending an Appendix to AD B. Dame Judith recommends that "The government should significantly restrict the use of desktop studies to approve changes to cladding...."

Amending the text of the Approved Document is only amending guidance. If the intention is to restrict the use of assessment's in lieu of test, then this can only be done in an enforceable manner if the regulations are amended. This requires formal legal advice.

If government intends to restrict these studies then the wording needs to be amended from the current guidance and moved to the secondary legislation. A professional engineering body is not well placed to offer draft legislative text.

Question 5. As with Q4 this cannot just be guidance.

Question 6. As far as possible methods a) and c) should be used. Where method b) is to be permitted then it needs to be very tightly controlled in terms of the methodology and the competence of the assessor. There is a strong argument that any such assessment should be subject to the same level of third party checking as any structural design calculations required to satisfy Part A of the regulations.

CIBSE is not convinced that assessments should be completely restricted, but their use should be very significantly reduced and tightly controlled.

Question 7. CIBSE does not entirely follow the calculation in the impact assessment of the cost benefit. However, it also notes that this issue cannot solely be decided on cost benefit grounds.

Question 8. It is not clear whether this consultation is about restrictions to assessments in relation to cladding and external insulation, or other aspects of buildings. Indications from industry suggest that whilst there is a strong argument for significant restrictions for cladding and insulation, further consideration is needed in relation to the detailed provisions in relation to other building components.

Question 9. A change to the regulations, rather than the guidance, will contribute to achieving the intended outcome. However, as Dame Judith herself makes very clear, there are no single solutions to address the systemic failings in the overall system of regulation and control of buildings. This is an important element of delivering a solution.

Dame Judith calls for buildings to be considered as systems, and as well as considering the test requirements for cladding and external insulation other aspects of the life safety systems of the building such as active and passive fire protection also need to be considered.

Question 10. This requires further consideration and analysis, as noted in response to Q8.

Question 11. See Answer to Qs 8 and 10.

Question 12. It is essential that changes are carefully considered and in particular that unintended consequences are assessed, as far as possible, before firm decisions are made.