

**Review of the ban on the use of combustible materials in and on the external walls of buildings including attachments**

Question	Response
<p><b>Question 6</b> Which components, if any, do you consider should be included in the list of specified attachments in Regulation 2(b) and why?</p>	<p>We consider that Plastic cavity trays should be included.</p> <p>Our initial thoughts were that this could be a mistake in the wording and the intention was that it would be exempt where they are used between two non combustible layers, and in fact this argument has been accepted in the revised Building regulations in Scotland but not accepted in England where Government are looking for industry to develop alternatives that meet the requirement.</p> <p>Our understanding is that the alternatives have an unproven life expectancy which would require a facility to inspect and replace them, which would be unworkable.</p> <p>Our response argues that the ban would be retrograde step taking the industry back to a block and masonry solution with time, cost and environmental implications with no benefit of mitigated risk by allowing the use of Plastic trays on projects where SFS was installed.</p> <p>Industry engagement has highlighted several non-exempt components of an external wall that are thought by stakeholders to contribute minimally to the spread of any potential fire and the ban on their use has created a significant burden on industry. The survey of industry stakeholders reported that 79.5% of respondents believe alternative products are hard to find with 52.9% reporting that the ban was impacting delivery times of new projects.</p> <p>The additional argument is that the exempt list includes some water proofing and insulation materials because they are in fact waterproof as are cavity trays.</p> <p><i>67. Water proofing and insulation materials used in external wall construction below ground</i></p>

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	<p><i>level are exempt from the requirements of Regulation 6(3) and 7(2). This is because these products also need to be water resistant.</i></p> <p>The current list of exemptions goes on to include several items that are in area much greater in size and volume than cavity trays namely</p> <p>c) Door frames and doors; e) Insulation and water proofing materials used below ground level; g) Membranes; h) Seals, gaskets, fixings, sealants and backer rods; i) Thermal break materials where the inclusion of the material is necessary to meet the thermal bridging requirements of Part L of Schedule 1 of the Building Regulations; or j) Window frames and glass."</p> <p>We maintain that this ban is unnecessary and the fact that any exemptions are in place related to cavity trays indicates that they will not provide a threat to life or building safety, which are adequately covered by other elements of this ban</p>
<p><b>Question 8</b> 23 Do you agree that cavity trays should, by temporary relaxation for 18 months, be exempted from the requirements of Regulation 6(3) and 7(2)?</p>	<p>Yes/<b>No</b>/Don't Know We feel that plastic cavity trays should be permanently placed on the list of exempt materials</p>