

Association of British Insurers response to consultation on amendments to The Building Regulations (Northern Ireland) 2012 and associated technical guidance

About the Association of British Insurers

1. The Association of British Insurers (ABI) is the voice of the UK's world-leading insurance and long-term savings industry. A productive, inclusive and thriving sector, our industry is helping Britain thrive with a balanced and innovative economy, employing over 300,000 individuals in high-skilled lifelong careers, two-thirds of which are outside of London.
2. The UK insurance industry manages investments of over £1.7 trillion, pays nearly £12 billion in taxes to the Government and powers growth across the UK by enabling trade, risk-taking, investment and innovation. We are also a global success story, the largest in Europe and the fourth largest in the world.
3. Founded in 1985, the ABI represents over 200 member companies providing peace of mind to households and businesses across the UK, including most household names and specialist providers.
4. The ABI's role is to:
 - Get the right people together to help inform public policy debates, engaging with politicians, policymakers and regulators at home and abroad;
 - Be the public voice of the sector, promoting the value of its products and highlighting its importance to the wider economy and society;
 - Help encourage consumer understanding of the sector's products and practices; and
 - Support a competitive insurance industry, in the UK and overseas

Consultation Response

5. We welcome the opportunity to comment on the Department of Finance's consultation on amendments to The Building Regulations (Northern Ireland) 2012 and associated technical guidance. We have already set out our general views on the issues highlighted in the consultation paper in our responses to the UK Government Ministry for Housing, Local Government and Communities review of the ban on the use combustible materials consultation and HCLG Committee pre-legislative scrutiny of the draft Building Safety Bill for England. Therefore, we have limited our response to our key focus areas: the nature of the ban; height threshold; buildings included within the ban and other fire safety asks.
6. We strongly agree that combustible materials should be banned through law. Implementing the ban through clear legislation is the most appropriate mechanism to ensure that combustible materials are not put onto external walls of high-rise and high-risk buildings.
7. We disagree that the height threshold of the ban should be set at 18 metres. We believe that the regime should be based on the risk posed by a building's use rather than simply its height. This is particularly important for buildings which house the most vulnerable in society, including schools, hospitals, care homes and social housing, as well as commercial buildings with a sleeping risk such as hotels, hostels and student accommodation. Combustible cladding should not be used on any of these buildings, regardless of height.

8. In addition to height and vulnerability, other factors that should be taken into consideration should include the complexity of the building layout, construction type, and work activities that may increase the risk of fire and how materials are used and stored.
9. The ban on combustible materials in the limited types of buildings that have been set out to date runs the risk of unnecessarily limiting the public safety benefits that the intervention is designed to achieve. Considerations should not be driven solely by a specific trigger height, but a new approach should reflect the risk and vulnerability of the building and those within it.
10. If a height threshold is to be set, the ban should apply to a lower threshold of all buildings over 11 metres. This is due to the limitations of fire brigade equipment such as the effective reach of firefighting jets from ground level and the use of portable ladders. Combustible cladding should not be used on buildings where the building's height or size will pose significant difficulties to the effective use of modern firefighting appliances, equipment and deployment techniques.

Hotels, hostels and boarding houses

11. We strongly support the inclusion of hotels, hostels and boarding houses in the definition of relevant building and being subject to the ban. These are all buildings in which occupants sleep, making occupants especially vulnerable to the risk of fire.
12. Hotels and hostels will likely be occupied by members of the public who are in unfamiliar surrounds and have not received specific fire safety training and are dependent on staff to safely evacuate the building.
13. In addition, vulnerable occupants (e.g. elderly or those with disabilities) may have difficulties in evacuating in a timely manner – evacuation may be delayed due to the use of refuge areas and there may be a reliance on staff for assistance. Even with a comprehensive fire detection system, fire spread up the outside of a building may not be detected until the fire is advanced. Therefore, vulnerable people may be exposed in a combustible building for a longer period of time when a fire is already well developed. Hotels, hostels and boarding houses will often have skeleton staffing overnight, meaning there are even fewer resources available for people who require assistance and encouragement to evacuate if a fire occurs.
14. There is therefore a high risk to life safety and property protection in hotels, hostels and boarding houses, as well as other building types which house vulnerable people, some of which will contain a significant number of occupants.

Other fire safety asks

15. Whilst the removal of combustible cladding is an important measure to reduce the fire risk to a building, various passive and active fire risk management measures are required and should work together within a building as a 'system'. We support the mandatory installation of sprinklers in high-risk and high-rise buildings. We believe the installation of sprinklers for all new build schools, care homes and warehouses over 2000m², no matter what height the building is, should be mandatory. The ABI

commissioned the FPA to complete research into suitable standards for installing sprinklers into multi-occupancy, residential buildings. This resulted in a publicly available technical guidance note which aims to ensure that the installation and management of sprinkler systems in residential buildings is of a high standard, including mechanisms to encourage more tamper-resistant systems, lessening the risk of these systems not working as intended in a domestic setting, as well as reducing the potential for them to pose a significant escape of water risk to insurers. It is important that the installation of sprinkler systems in UK buildings meets the requirements set out within this guidance.¹

16. We also support the installation of high integrity fire alarms in new buildings to reduce the current high level of false alarms that means most Fire and Rescue Services require other verifiable information of a fire to respond. The ABI commissioned research which found that whilst the technology that could virtually eliminate false alarms is now widely available, its attributes are not generally well recognised and until they are used more widely, the Fire and Rescue Services will be unlikely to alter their response.²
17. While we welcome the innovation of modern methods of construction (MMC) and the potential benefits for boosting housing supply, we are calling for the rigorous testing of the long-term durability, repairability and resilience of buildings developed using MMC, in order to fully understand the associated costs and practicalities of their repair. This information is needed to ensure that properties built using MMC are resilient to future perils and are built and maintained in a way which enables them to access affordable insurance for the lifetime of the property.

**Association of British Insurers
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¹ <https://www.abi.org.uk/globalassets/files/subject/public/fire/abi-post-grenfell-residential-sprinkler-study-oct-2018.pdf>

² <https://www.abi.org.uk/globalassets/files/publications/public/property/2018/07/abi-fpa-detection-demonstration-report-2018.pdf>