CIBSE response to ‘Building a Safer Future’

This response to Dame Judith Hackitt’s Independent Review of Building Regulations and Fire Safety is submitted by the Chartered Institution of Building Services Engineers, CIBSE, the professional body that exists to ‘support the Science, Art and Practice of building services engineering, by providing our members and the public with first class information’

CIBSE members are engineers who design, install, operate, maintain and refurbish life safety and energy using systems installed in buildings. CIBSE members include specialists in fire safety systems and fire engineering, lifts and public health systems supplying water to buildings. Others specialise in the design of energy using systems for the provision of heating and hot water, lighting, ventilation and cooling and small power distribution systems.

CIBSE is unusual amongst built environment professional bodies because it embraces design professionals and also includes installers and manufacturers and those who operate and maintain engineering systems in buildings, and so we have an interest throughout the life cycle of buildings.

CIBSE has over 20,000 members worldwide, with around 75% operating in the UK and many of the remainder in the Gulf, Hong Kong and Australasia. CIBSE is the sixth largest professional engineering Institution, and along with the Institution of Structural Engineers is the largest dedicated to engineering in the built environment. Our members design, install, manufacture, maintain, manage, operate and replace all the energy using systems in buildings as well as public health systems. As well as having international experience and knowledge of life safety requirements in many other jurisdictions, we also have members working in London Underground, with considerable experience in the regulations governing sub-surface stations, which are heavily influenced by the requirements introduced following the Kings Cross fire in 1987.

As an Institution CIBSE publishes Guidance and Codes which provide best practice advice and are internationally recognised as authoritative. The CIBSE Knowledge Portal, makes our Guidance available online to all CIBSE members and is the leading systematic engineering resource for the building services sector. Over the last twenty-one months it has been accessed over 200,000 times, and is used regularly by our members to access the latest guidance material for the profession. Currently we have users in over 170 countries, demonstrating the world leading position of UK engineering expertise in this field.

The Institution supports the overall conclusion of the Review in calling for wide ranging reforms to the system of building regulation in England and the management of higher risk residential buildings during their whole operating life. This is a once in a generation call for fundamental change in the way that we regulate the construction and operation of buildings to deliver safe environments, which seeks to address many of the flaws that our membership have grappled with for many years.

Whilst recognising that Dame Judith’s Terms of Reference directed her to address high rise residential buildings, we wholeheartedly support her repeated observation that many of her recommendations should be applied more widely. We also recognise her call for complex buildings to be recognised as systems, and for a systems engineering approach to be adopted in relation to managing their design, delivery and operation, as well as ongoing maintenance and refurbishment.
CIBSE has been actively involved in the development of the Construction Industry Council response to the Independent Review, and we are pleased to endorse that response and not to repeat it. We do wish to emphasise the response to three specific aspects of the Review which are also addressed in the CIC response: gateways, competence and the proposed Joint Competent Authority.

Gateways are an essential discipline in systems engineering. It is essential that the requirements at each of the three proposed gateways are clear and are robustly enforced. At Gateway 2 it is essential that a design is signed off, and that subsequent design changes are as carefully controlled and regulated as the initial sign off. This is common practice in many branches of engineering, and needs to become common in the construction and refurbishment of complex buildings. It will inevitably incur costs at the design stage, but it will undoubtedly save costs and lives during building operation.

Dame Judith calls for full digital asset models, which we support. Building Regulations already require information to be provided at handover, but building control professionals are unable to enforce the regulations as currently formulated, and so the requirement is widely ignored. This must change, and failure to provide full information about a building at handover must come to be seen as irresponsible, unprofessional and completely unacceptable throughout the industry.

Much has been said and written about competence of those involved in complex building. CIBSE is fully committed to and engaged in the work of the Industry Response Group on this matter, and wholeheartedly supports to drive to develop and effective competence regime for the industry.

The CIC response deals with the proposed Joint Competent Authority. It is unclear to us how the JCA can function at both a local authority level, and undertake the national co-ordination role across England which is called for. CIC has addressed this in some detail and CIBSE fully supports that analysis, and the proposal for a building standards agency at a national level.

The Institution is firmly committed to continuing to work with other professional bodies within the Construction Industry Council, as well as with the wider Industry Response Group and with government to deliver the far reaching systemic changes that are needed in culture and practice within the construction sector.

31st July 2018