LABSS INFORMATION PAPER INFOP43

Guidance on the verification of cladding remediation building warrant applications

This information paper has been produced by the Scottish Building Standards Hub (SBSH) on behalf of Local Authority Building Standards Scotland (LABSS).

Disclaimer – The information contained within this document is for general information purposes only. The decision to accept or reject any proposal submitted as part of a building warrant application rests with the relevant Local Authority Verifier**.**

Document Version Control.

Version:	Date:	Notes:
1.0	08.01.2026	Author SBSH - AMCA
1.1	25.03.2026	Link added to Scottish Government Factsheet

Purpose

This information paper outlines the key principles of how a verifier should consider any building warrant application involving cladding remediation and associated work.

It also outlines considerations for anybody submitting a building warrant application for such work.

The aim of this information paper is to ensure a robust, efficient, and consistent approach to the verification of relevant building warrant applications.

The need for a building warrant will be informed by the outcome of the Single Building Assessment (SBA). The Scottish Government Single Building Assessment Specification Document notes:

'The SBA assesses any risk to human life that is (directly or indirectly) created or exacerbated by the building's external wall cladding system and identifies what work (if any) is needed to eliminate or mitigate any risk of that kind.' And:

'*Tolerable Risk - A risk level that is deemed by an assessor to be an acceptable risk to human life. Remediation would not be required in this case.*'

Only work identified through the SBA should be included within any building warrant application, and where remediation is not required, no building warrant application is necessary.

Relevant Mandatory Standards and associated guidance only apply to new work and elements of the building affected by the new work and not to any other aspect of the building.

It's important to engage early with the relevant Local Authority Verifier if there is any uncertainty about whether a building warrant is required for remediation work identified through a SBA. This is particularly relevant where cladding remediation involves temporarily removing existing external wall materials to replace other components of the system.

Competent submission by applicant

The starting point for a robust, efficient, and consistent verification process is a full and competent building warrant application submission by the applicant/agent.

A competent application must include a clear and full description of all work, including any elements which are consequential to the primary cladding remediation work. It is critical that the extent of cladding remediation work is fully described including any element of the external wall build up which is remaining on the building.

It is possible that remediation may involve temporarily removing materials and components which are already part of the external wall in order to replace another part of the wall system, such as where a rainscreen is removed to access cavity barriers or insulation beneath. Where this is the case, any specification or method statement submitted in support of a building warrant application should also clearly identify this intention.

In proposing such an approach, the applicant should be satisfied that it is technically possible to remove and refix any cladding element and maintain its performance.

All building warrant application submissions should include:

- The relevant building warrant fee based on an accurate 'value of work' figure.
- Full existing and proposed plans, existing plans should include sufficient information to enable an assessment of the 'no worse than existing' consideration where this is permitted.
- Elevation drawings which should clearly show:
    - Existing and proposed wall types and materials (including details of cladding load-bearing substrate and any sheathing).
    - Areas of retained/replacement cladding.
    - Locations of retained and proposed cavity/fire barriers.
- Details of any relevant historic Building Warrants (reference numbers, year of construction etc) where this information is known by the applicant.
- Intrusive investigation summaries (photos, descriptions etc) where related to work which is the subject of the building warrant application.
- A summary of general fire safety details for the building, such as – fire safety design summary, escape strategy, escape routes, alarm and detection systems, fire suppression systems, smoke ventilation systems and other elements which were considered alternative to guidance when the building was constructed.

The applicant may wish to submit the SBA and the associated Fire Risk Appraisal of External Walls (FRAEW) and Fire Risk Assessment (FRA) reports to augment other supporting information forming part of the building warrant application submission. Note, such documents will not be 'assessed' by the verifier.

It should be noted that any additional work deemed necessary after the initial warrant submission and the start of any work, will be addressed through an amendment to building warrant application.

The agent and wider design team partners should be competent and have experience of cladding remediation work, work to high risk buildings and work to buildings with a storey over 11m and be familiar with the Scottish Building Standards system, mandatory standards and guidance.

It is important that those involved in cladding remediation communicate effectively to ensure the building warrant application includes all relevant information at the time of submission.

Building warrant approval is required before any works start on site and the applicant/agent should ensure sufficient time for the building warrant assessment and approval process when programming cladding remediation work.

Where proposals include elements of design which are considered alternative to the guidance within the Technical Handbooks, the timing of any submission should include consideration of the consultation between the verifier and The Scottish Fire and Rescue Service, where necessary under Section 10 or 11 of the Building (Procedure) (Scotland) Regulations, as amended. In addition, more complex proposals, such as those involving fire engineered solutions, may require third-party peer review, and again this should be considered when timing the submission of any building warrant application.

Verifiers should consider the most recent S34 letter in terms of the requirement to formally notify the BSD of any cladding remediation projects.

Work involving cladding remediation is considered as an alteration to the building and therefore the 'no worse than existing' principle should be considered where appropriate. This is, in the main, likely to relate to requirements under Section 6 - Energy of the Technical Handbooks and is not expected to be a relevant consideration for Section 2 – Fire, due to specific requirements of the cladding remediation scheme.

Technical considerations

All relevant Mandatory Standards and associated guidance clauses will apply as related to the particulars of each application. The following elements are noted due to their particular importance and relevance to cladding remediation work.

<u>Section 1 – Structure</u>

The preference from the verifier's perspective is that an application is supported by a Certificate of Design through the SER scheme.

Where calculations are submitted, this will extend the time it takes to assess the application, particularly where such checking is outsourced by the verifier, and this should be considered by the applicant/agent when deciding not to use certification of design and in the timing of the submission of any application.

Calculations and supporting information should include all information to demonstrate compliance with relevant Mandatory Standards.

The following can be important factors in the assessment of structural design and should be considered by those responsible for designing and installing any replacement external wall cladding system:

- The designed system is demonstrated to be capable of resisting the calculated wind loading.
- Insulation to render bond strength is adequately considered in render systems.
- Design pull-through values are considered and used appropriately.
- Fixing numbers / pattern are correctly specified and defined.
- Design pull-out value is correctly calculated at all levels of the building.
- The correct safety factors are applied as set out in relation to the specific system being used.
- The methodology for installation is clearly expressed.
- Sufficient detail of the building and its site context is available.
- Sufficient data is available to enable a detailed assessment to be carried out.
- Consideration is given to the need for a detailed site survey to be undertaken including specific pull out and / or adhesion tests.
- Wind pressure zones on the building are adequately described.
- Care is taken to avoid calculation errors resulting in over engineering of the system (which can cause failure e.g. where pull out zones overlap).

The above information is taken from The Scottish Government Building Standards Division's letter to verifiers dated 5 September 2017.

Where an SER Certification of Design is used, the level of supporting information provided to the verifier must be sufficient for the verifier to be satisfied that the work will comply with building regulations and to facilitate the undertaking of reasonable inquiry. This typically includes structural drawings, specifications, and any other information used for the certification process.

Section 2 – Fire

The assessment by the verifier will depend on the particulars of each building warrant application. The following key elements are highlighted:

- Proposals should be cognisant of the restrictions on the use of combustible materials in an external wall cladding system as set out in Regulation 8 of the Building (Scotland) Regulations 2004, as amended by Regulation 3 of the Building (Scotland) Amendment Regulations 2022.
- Compliance with Mandatory Standard 2.7 should be fully justified including submission of reaction to fire performance of all elements of the cladding system, and the provision of relevant 3rd party certification or original fire test results from a UKAS (or equivalent) accredited test house. This should include the original fire test reports and relevant classification reports. Supporting information in this respect

may reference products which have been deemed by European Commission decisions to meet Class A1 or A2 without testing.

- The design should consider previous clarification provided by the BSD to LABSS which validates the traditional approach when installing EWI to existing domestic buildings which is to include an A1 band of insulating material along lines of separation. This approach was in respect of the changes from the 1 June 2022 with a greater emphasis on cladding and junction detailing. More onerous considerations may apply should an external wall cladding system perform a more integral function with regards to separation and junction detailing as considered by guidance clause 2.2.10.
- Where proposals involve the replacement of any external wall sheathing or backing board, consideration must be given to guidance clause 2.7.1 of the Domestic Technical Handbook which requires a large scale fire test to justify the use of any combustible sheathing or backing board in any building with a storey 11m or more above the ground.
- Where any system is used beyond the limitations of any testing or accreditation, an extended field of application report, prepared by a competent person, will be required.
- Details should include consideration of whether the cladding system contributes to separation requirements under Mandatory Standard 2.2.
- Attention is drawn to the specific and different requirements under Mandatory Standards 2.2 and 2.4 in terms of the provision of fire barriers and cavity barriers.
- Mandatory Standard 2.6 will apply if within distances to boundaries as described in the Domestic Technical Handbook.
- Where relevant, information from any BS8414/BR135 testing should be provided and justified as relevant to the proposals. This is not permitted where the provisions of Regulation 8 apply.
- Where work involves balconies, their design should consider both Standards 2.7 and 2.8, which refer to different annexes and performance criteria depending on orientation.
- Specifications and relevant details should clearly highlight taping, sealing and jointing elements which should fully align with associated fire tests and manufacturers requirements.

<u>Section 3 – Environment</u>

Assessment by the verifier will depend on the particulars of each building warrant application. Where a cladding system contributes to the external wall performance in terms of resistance to precipitation and interstitial condensation, the requirements of Mandatory Standard 3.10 and 3.15 will apply and evidence of compliance will require to be provided.

Given the age of buildings being considered through the cladding remediation scheme, the requirements of Mandatory Standard 3.14 – Ventilation are generally not considered to be applicable. However, where the air tightness of a particular building is improved, through

cladding remediation, to an extent where the air tightness of the building requires a review of the ventilation strategy, further information may be required.

Section 4 – Safety.

The requirements of this section will apply where relevant, this could relate to any replacement of balconies or other forms of protective barrier.

Section 5 – Noise

Applicants should satisfy themselves that cladding remediation will not result in increased flanking noise transmission to the detriment of Standard 5.1.

Section 6 – Energy

As noted previously, a 'no worse than existing' approach is considered reasonable in terms of aligning with the overall principles of the cladding remediation programme. Should a solution include elements of improvement of the external envelope, for example by the nature of insulation materials used within the cladding system, this will be considered as part of the assessment of the application.

Section 7 – Sustainability

It is not envisaged that standards in this section will be relevant for cladding remediation work.

Reasonable inquiry

Before deciding to accept or reject a Completion Certificate submission, a verifier will undertake reasonable inquiry.

This will be considered by the verifier using the principles of Verification During Construction, this will rely on notification by the applicant at all key stages outlined in the Construction Compliance and Notification Plan for the project.

In terms of the submission of a Completion Certificate by the relevant person and while some flexibility was introduced through the 2007 amendments to the Building (Procedure) (Scotland) Regulations 2004, the key principle remains that where a single Completion Certificate is submitted, the verifier can only issue a single Acceptance of Completion Certificate.

The Completion Certificate submission should be accompanied by relevant supporting information as required by the verifier.

General points to note

Verifiers should assess any cladding remediation building warrant application with due regard to the Building Standards Operating and Performance Frameworks.

LABSS and the SBSH will provide support to any verifier as required to ensure the effective processing of cladding remediation building warrant applications.

Effective communication between verifiers and the Scottish Government's Building Standards Division will be necessary to respond efficiently to any challenges encountered during the assessment of cladding remediation building warrant applications.

Further information can be found within the Scottish Government cladding remediation Factsheet

End.