

# Building Regulations

## Review of Approved Document A: Structure

A Call for Evidence

# Contents

Summary .....	3
Introduction .....	5
Aim of the call for evidence .....	6
Call for evidence questions .....	7
Next Steps.....	13
Annex A: Call for evidence questions.....	15
Annex B: HSE Confidentiality and GDPR statements .....	19

# Summary

Topic of this consultation:	This call for evidence seeks views on the future guidance contained within Approved Document A (Structure).
Scope of this consultation:	Statutory Guidance
Geographical scope:	These proposals relate to England only.
Impact assessment:	None

## Basic Information

Body/bodies responsible for the consultation:	The Health and Safety Executive
Duration:	This call for evidence will last for 10 weeks from Monday 10 <sup>th</sup> February to Monday 21 <sup>st</sup> April 2025.
Enquiries:	For any enquiries about the call for evidence please contact the Technical Policy Team by emailing: <a href="mailto:ADAcallforevidence@hse.gov.uk">ADAcallforevidence@hse.gov.uk</a>
How to respond:	<p>You may respond by completing this online survey.</p> <p>Alternatively, you can email your response to the questions to: <a href="mailto:ADAcallforevidence@hse.gov.uk">ADAcallforevidence@hse.gov.uk</a></p> <p>If you are responding in writing, please make it clear which questions you are responding to.</p> <p>Written responses should be sent to:</p> <p>Review of Approved Document A: Call for Evidence, Technical Policy Team, Building Safety Regulator, 10 South Colonnade, Canary Wharf, London, E14 4PU</p>

When you reply, it would be useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name;
- your position (if applicable);
- the name of your organisation (if applicable);
- an address (including post code);
- an email address; and
- a contact telephone number

We strongly encourage responses via the online survey. Using the online survey greatly assists our analysis of the responses, enabling more efficient and effective consideration of the issues raised.

# Introduction

1. Building Regulations set technical requirements covering a wide range of health, safety, access, security and sustainability issues. The Regulations are supported by statutory guidance in “Approved Documents” which provide practical guidance on ways to comply with the requirements in the Regulations.
2. Approved Document A (ADA) provides practical guidance on ways to comply with the Buildings Regulations Requirements which relate to the structural safety of buildings. These are:

## Requirement A1: Loading

(1) The building shall be constructed so that the combined dead, imposed and wind loads are sustained and transmitted by it to the ground:

- (a) safely; and
- (b) without causing such deflection or deformation of any part of the building, or such movement of the ground, as will impair the stability of any part of another building.

(2) In assessing whether a building complies with sub-paragraph (1) regard shall be had to the imposed and wind loads to which it is likely to be subjected in the ordinary course of its use for the purpose for which it is intended.

## Requirement A2: Ground movement

The building shall be constructed so that ground movement caused by:

- (a) swelling, shrinkage or freezing of the subsoil; or
- (b) land-slip or subsidence (other than subsidence arising from shrinkage), in so far as the risk can be reasonably foreseen, will not impair the stability of any part of the building.

## Requirement A3: Disproportionate collapse

The building shall be constructed so that in the event of an accident the building will not suffer collapse to an extent disproportionate to the cause.

3. ADA states *“In the Secretary of State’s view the requirements of A1 and A2 will be met by following the recommendations given in the documents listed in Section 1 or by adopting the guidance in Sections 2-4.”*
4. ADA section 1 was last revised in May 2013 to remove the reference to discontinued British Standards and to include the Eurocodes. Additionally, some elements of sections 2-4 of ADA based on technical content from the Eurocodes were revised.

5. Most structural design undertaken in England demonstrates compliance with the building regulations requirements A1 and A2 by following the standards referenced within section 1 of ADA, the vast majority of which are Eurocodes.
6. Since May 2013, the second generation of Eurocodes have been in development. These standards seek to build on the first generation of the Eurocode standards by increasing ease of use, embracing state of the art approaches and technologies and by increasing standardisation across Europe.
7. On 30th March 2028, the first generation of the Structural Eurocodes are due to be withdrawn.
8. We are proposing revising ADA to coincide with the withdrawal of the first generation Eurocode Standards. At this point we propose that throughout ADA any reference to Eurocodes is updated to reflect the second generation version of the document.
9. ADA has not been substantially reviewed recently and we are planning on using this opportunity to undertake a wider review of the document, beyond the changes which are required due to the Eurocode revision.

## Aim of the call for evidence

10. The aim of this call for evidence is to collect evidence on areas of the guidance requiring increased clarity, research, or further development.
11. The ADA review is proposed to cover the whole document with the highest priority areas being any changes required to remove reference to the first generation of Eurocode Standards, which is likely to entail revising to reflect the second generation of Eurocode standards.
12. We are reviewing ADA as part of our commitment to continuous improvement in the guidance we prepare. It may be that feedback from this call for evidence can't be included within this revision of the guidance due to time and resource constraints but may be included in a future update to the guidance.
13. We will consult in detail on any proposed changes to ADA prior to publication.

# Call for evidence questions

14. This section sets out those areas identified as requiring further evidence prior to deciding whether they should be included as part of the review. Respondents are asked to comment on these areas and to suggest any other issues that should be considered.

## Section 1: Codes, standards and references for all building types

15. The majority of buildings in England demonstrate compliance with the Building Regulations by designing to standards listed in section 1 of ADA. Most standards listed in this section are part of the Eurocode suite of standards.

### Question 1

Do you have any suggestions for standards which should be added or removed from section 1?

If Yes, please outline your suggestion and the reason for making it.

16. Paragraph 1.12 of ADA deals with compliance with Part A for certain works on existing buildings.

17. A new standard, EN 1990-2, is due to be published shortly as part of the second-generation suite of Eurocodes. This document provides provisions for the assessment of existing structures.

18. We are aware of industry concerns in relation to works to existing buildings. In particular that when working on existing structures, it isn't always clear which standards should be used for checks and that the extent of checks which are required is sometimes not clear.

### Question 2

Do you have any comments on how works to existing buildings should be considered within ADA including any gaps in the current ADA in relation to the approach to projects on existing buildings? Y/N

If yes, please explain your reasons and provide evidence to support your answer.  
[free text]

## **Section 2: Sizes of structural elements for certain residential buildings and other small buildings of traditional construction`**

19. We are aware of reports that section 2 causes some confusion in particular in relation to which building types the guidance can be applied to and when to use the subsections.

### **Question 3**

Do you think it is clear how and where section 2 guidance can be used? Y/N

If No, please explain your reasons and provide evidence to support your answer.  
[free text]

## **Section 2A: Basic requirements for stability**

20. This section provides some basic high-level principles related to low rise residential buildings.

### **Question 4**

Do you have any feedback on section 2A? Y/N

If Yes, please explain your reasons and provide evidence to support your answer.  
[free text]

## **Section 2B: Sizes of certain timber members in floors and roofs for dwellings. Areas at risk from house longhorn beetle**

21. This section provides some guidance for sizing timber members. It also provides guidance in relation to treatment for house longhorn beetle.

### **Question 5**

Do you have any feedback on section 2B? Y/N

If Yes, please explain your reasons and provide evidence to support your answer.  
[free text]



## **Section 2C: Thickness of walls in certain small buildings**

22. Section 2C provides design rules for walls in small scale masonry construction. We are aware of reports that parts of 2C cause confusion, particularly diagram 14.

### **Question 6**

Are there parts of the section 2C guidance that cause confusion or are not needed? Y/N

If yes, please explain your reasons and provide evidence to support your answer.  
[free text]

### **Question 7**

Do you have any technical concerns in relation to recommendations in this section? Y/N

If yes, please provide evidence to support your answer. [free text]

## **Section 2D: Proportions for masonry chimneys above the roof surface**

23. Section 2D provides design rules for chimneys.

### **Question 8**

Do you have any feedback on section 2D? Y/N

If Yes, please explain your reasons and provide evidence to support your answer.  
[free text]

## **Section 2E: Foundations of plain concrete**

24. Section 2E provides design rules for concrete strip foundations.

### **Question 9**

Do you have any feedback on section 2E? Y/N

If Yes, please explain your reasons and provide evidence to support your answer.  
[free text]

### Section 3: Wall Cladding

25. This section provides high level guidance in relation to wall cladding. We believe that the guidance may need to be updated to provide more detail on areas where some of the more common problems arise.

#### Question 10

Is the guidance provided currently on wall cladding sufficient? Y/N

If no, what needs addressing within the current guidance. Please provide evidence to support any responses. [free text]

### Section 4: Roof covering

26. We have received industry reports that the roof covering section of ADA contains ambiguity over where and how it applies for example in relation to solar panels and how you calculate increases in load.

#### Question 11

Do you agree that the roof covering section of ADA contains ambiguity over where and how it applies? Y/N

If yes, please provide evidence to substantiate these industry reports and suggest how ADA should be updated. [free text]

### Modern Methods of Construction (MMCs)

27. Innovative building products and construction processes aim to provide more efficient methods of construction and better performing buildings. But some issues have occurred with new construction technologies. For example, Reinforced Aerated Autoclaved Concrete panels which have failed in a small number of instances and Large Panel System Concrete buildings which are sometimes at a heightened risk of disproportionate collapse.

28. These technologies have raised awareness of potential legacy issues which can be embedded in the built environment with new technologies. The review will need to consider if the current provisions in ADA address the risks associated with MMCs.

**Question 12**

Do you agree that MMCs need more consideration in ADA? Y/N

If yes, please explain how MMCs could be better incorporated and provide evidence to support your answer. [free text]

**Question 13**

Do you currently work with MMCs? Y/N

If yes, please provide feedback on how you demonstrate compliance to building regulations for MMCs. [free text]

**Design Checking**

29. We are aware of industry concerns about the level of checking that is undertaken in relation to structural designs. In particular, that less checking of building structures occurs compared to other related disciplines for example on temporary works designs or on the design of civil engineering structures. Also that the increased reliance on computer modelling in structural designs increases the risk of design errors occurring.
30. ADA does not directly cover structural design checking currently within the document. Checking is covered in BS EN 1990:2002+A1:2005 Eurocode Basis of Design in part 1, which provides a recommended framework for checking within Table B4. This standard is recommended in ADA as a mean of demonstrating compliance with the building regulations and should be followed if other parts of the Eurocodes are being used to maintain adequate safety levels. We do not currently know the level of industry compliance with Table B4 when undertaking projects.
31. The corresponding second-generation Eurocode BS EN 1990:2023 approaches design checking in a similar way to BS EN 1990:2002+A1:2005 within Table B.2. The UK has not yet taken a decision on the nationally determined parts of Table B.2.

32. We could provide more guidance on levels of checking required to demonstrate compliance with the building regulations. This could come from industry, be part of the Eurocode National Annex or sit within ADA.

#### **Question 14**

Is more guidance needed covering required design checking levels to meet building regulations? Y/N

If yes, please explain what shape this should take and your reasons for suggesting it. Please provide any evidence you can to support your answer. [free text]

### **Competence of Structural Engineers**

33. We are aware of industry concerns about the competence of some individuals and organisations undertaking structural designs on projects.

34. The second-generation Eurocode BS EN 1990:2023 has provisions which allows countries to stipulate minimum design qualification and experience levels for projects in different consequence classes within Table B.1. The UK has not yet taken a decision on the nationally determined parts of Table B.1.

#### **Question 15**

Should competency of structural engineers undertaking projects be better covered in ADA or in documents referenced within? Y/N

If yes, please explain what shape this should take and your reasons for suggesting it. Please provide any evidence you can to support your answer. [free text]

### **Other Issues**

35. We are aware that there may be additional feedback on ADA which we are unlikely to have the time and resources to address with this amendment but may consider in future amendments. This includes referencing design guides rather than standards within ADA, inclusion of other residential forms of construction for prescriptive design and broadening ADA to make it more descriptive and multi-disciplinary.

36. We would welcome further feedback on the above as well as any additional feedback on ADA.

**Question 16**

Are there other parts of ADA that require amendments? Y/N

If yes, please explain your reasons and provide evidence to support your answer.[free text]

**Question 17**

Are there any new issues that should be covered by ADA? Y/N

If yes, please explain your reasons and provide evidence to support your answer.  
[free text]

# Next Steps

37. It is envisaged that the responses to this call for evidence will help inform a programme of work to revise the guidance in ADA .

38. This call for evidence feeds into wider work the BSR is undertaking on structural safety guidance.

39. We will be consulting further on changes to ADA in due course.

# Annex A: Call for evidence questions

Respondent details	
Name	
Position (if applicable)	
Organisation (if applicable)	
Address (including postcode)	
Email address	
Telephone number	
Please state whether you are responding as an individual or the organisation stated above	

Please indicate whether you are responding to this call for evidence as a:	Select one
Builder / Developer	
Designer / Engineer / Surveyor	
Local Authority	
Building Control Approved Inspector	
Architect	
Manufacturer	
Insurer	
Construction professional	
Property Manager / Housing Association / Landlord	
Landlord representative organisation	
Building Occupier / Resident	
Tenant representative organisation	
Other interested party (please specify)	

**Question 1**

**Do you have any suggestions for standards which should be added or removed from section 1?**

YES/NO

If Yes, please outline your suggestion and the reason for making it.

[Free text]

**Question 2**

**Do you have any comments on how works to existing buildings should be considered within ADA including any gaps in the current ADA in relation to the approach to projects on existing buildings?**

YES/NO

If yes, please explain your reasons and provide evidence to support your answer.

[Free text]

**Question 3**

**Do you think it is clear how and where section 2 guidance can be used?**

YES/NO

If No, please explain your reasons and provide evidence to support your answer.  
[free text]

[Free text]

**Question 4**

**Do you have any feedback on section 2A?**

YES/NO

If Yes, please explain your reasons and provide evidence to support your answer.

[Free text]

**Question 5**

**Do you have any feedback on section 2B?**

YES/NO

If Yes, please explain your reasons and provide evidence to support your answer.

[Free text]



<b>Question 6</b>	
<b>Are there parts of the section 2C guidance that cause confusion or are not needed?</b>	YES/NO
If yes, please explain your reasons and provide evidence to support your answer.	[Free text]
<b>Question 7</b>	
<b>Do you have any technical concerns in relation to recommendations in this section?</b>	YES/NO
If yes, please provide evidence to support your answer.	[Free text]
<b>Question 8</b>	
<b>Do you have any feedback on section 2D?</b>	YES/NO
If Yes, please explain your reasons and provide evidence to support your answer.	[Free text]
<b>Question 9</b>	
<b>Do you have any feedback on section 2E?</b>	YES/NO
If Yes, please explain your reasons and provide evidence to support your answer.	[Free text]
<b>Question 10</b>	
<b>Is the guidance provided currently on wall cladding sufficient?</b>	YES/NO
If no, what needs addressing within the current guidance. Please provide evidence to support any responses.	[Free text]
<b>Question 11</b>	
<b>Do you agree that the roof covering section of ADA contains ambiguity over where and how it applies?</b>	YES/NO
If yes, please provide evidence to substantiate these industry reports and suggest how ADA should be updated.	[Free text]

<b>Question 12</b>	
<b>Do you agree that MMCs need more consideration in ADA?</b>	YES/NO
If yes, please explain how MMCs could be better incorporated and provide evidence to support your answer.	[Free text]

<b>Question 13</b>	
<b>Do you currently work with MMCs?</b>	YES/NO
If yes, please provide feedback on how you demonstrate compliance to building regulations for MMCs.	[Free text]

<b>Question 14</b>	
<b>Is more guidance needed covering required design checking levels to meet building regulations?</b>	YES/NO
If yes, please explain what shape this should take and your reasons for suggesting it. Please provide any evidence you can to support your answer.	[Free text]

<b>Question 15</b>	
<b>Should competency of structural engineers undertaking projects be better covered in ADA or in documents referenced within?</b>	YES/NO
If yes, please explain what shape this should take and your reasons for suggesting it. Please provide any evidence you can to support your answer.	[Free text]

<b>Question 16</b>	
<b>Are there other parts of ADA that require amendments?</b>	YES/NO
If yes, please explain your reasons and provide evidence to support your answer.[free text]	[Free text]

<b>Question 17</b>	
<b>Are there any new issues that should be covered by ADA?</b>	YES/NO
If yes, please explain your reasons and provide evidence to support your answer.	[Free text]

# Annex B: HSE Confidentiality and GDPR statements

HSE tries to make its consultation procedures as thorough and open as possible.

Information provided in response to this consultation may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the General Data Protection Regulations (GDPR) and the Environmental Information Regulations 2004 (EIR)). Statutory Codes of Practice under the FOIA and EIR also deal with confidentiality obligations, among other things.

If you would like us to treat any of the information you provide as confidential, please make this clear in your response. Ideally, confidential information should be submitted using the functionality provided at the end of the consultation for attaching confidential documents. If we receive a request under FOIA or EIR for the information you have provided, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will be disregarded for these purposes. Requests for confidentiality should be made explicit within the body of the response.

HSE will process all personal data in accordance with the GDPR. This means that personal data will not normally be disclosed to third parties and any such disclosures will only be made in accordance with the Regulations.

## **How to submit comments**

When responding to this call for evidence, please provide as much information and evidence as you can.

By submitting information as part of this call for evidence, you agree that any data provided (excluding your personal details) can be shared with the Ministry of Housing, Communities and Local Government, our independent scientific advisers, the appropriate authorities and other government departments as required for the development of this call for evidence.