

# Fire Brigades Union - North Wales

Huw Lewis AM  
Chair, Proposed Domestic Fire Safety LCO Committee  
Welsh Assembly Government  
Cardiff Bay  
Cardiff

14 April 2008

Dear Chair

## **Public Consultation - Proposed Domestic Fire Safety LCO Committee**

The Fire Brigades Union in Wales welcomes this opportunity to submit evidence to your Committee, on the Proposed Domestic Fire Safety LCO.

In your letter dated 19th March 2008 you specifically asked to receive evidence in three main areas. The evidence we submit will therefore be in the order of the questions you raise.

### **"1. What are your views on the general principal that legislative competence in the area identified in Matter 11.1 be conferred on the Assembly?"**

We understand that this LCO is part of a process to extend the legislative competence of the National Assembly for Wales to make new laws for Wales under Section 93 of the 2006 Act, specifically to impose requirement for fire sprinkler systems to be fitted in new residential premises. Legislative competence is sought in this area so that the Assembly can play a vital role in changing and improving the lives of people in Wales.

The present Fire and Rescue Service National Framework for Wales states that the National Assembly for Wales functions include duties to promote public safety and to ensure the safety of firefighters.

All employers have a legal duty to make a suitable and sufficient assessment of the health and safety risks to employees and introduce control measures. The mandatory fitting of sprinklers in new build domestic properties is an example of a control measure. Sprinklers mean that conditions for firefighters, entering the building in a fire, are much less hazardous and arduous than if the fire developed unchecked.

Whilst the Assembly is not the employer, responsibility for the Fire and Rescue Service in Wales was devolved to the Assembly in 2004 and this places a moral duty on the Assembly to ensure firefighter safety at all times. In recent years a number of firefighters have died in domestic fires, Blaina Gwent is one such example. If sprinklers had been fitted to the domestic dwelling in Blaina Gwent, two firefighters would not have lost their lives. The same is true of the flat fire at Harrow Court in Stevenage, Hertfordshire, which claimed the lives of a resident, and two firefighters.

Any death at work is a horrendous tragedy. On the 2 February 2005 Blue Watch, Stevenage demonstrated remarkable heroism. At this incident two Firefighters who had already saved one member of the public, on re-entering the building, died trying to save the life of another. We often discuss statistics and figures in relation to accidents and incidents such as this. However behind these statistics lie real people, real families, and real tragedies. Sprinklers would have prevented this tragedy from occurring.

In Wales a large number of people die in fires in their home, yet there has never been a fire death in a fully sprinklered domestic building in the United Kingdom. Recently two people survived a flat fire in Wiltshire purely because the property was fitted a sprinkler system. A fully sprinklered domestic building is the equivalent of having a firefighter in every room 24 hours a day, 7 days a week.

The cost of a sprinkler system in a new build is on average around 1.5% of the build cost, cheaper than a reasonably priced carpet. Whilst the estimated cost of fires to the UK economy is over £7 billion a year, equivalent to 0.78% of the gross value of the economy.

### **"2. What are your views on the terms of the proposed Order? For example, are they too narrowly or too broadly drawn? Will they allow for the future implementation of the policy proposals as outlined in the Explanatory Memorandum?"**

We believe that the LCO should purely deal with new build domestic properties. Whilst in an ideal world, all premises should be sprinklered, it is not realistic at this point in time. Widening the scope of the LCO would provide a great deal of ammunition to the opponents of this legislation. Once the principle of sprinklers in new build domestic properties has been accepted, it can be used as a spring board for other initiatives.

### **3. "Is it necessary to set out the meaning of 'new residential premises' and 'sprinkler system' in the proposed Order? If so, are the interpretation provisions appropriate, or should there be any changes to the way they are drafted? If so, how and why?"**

The Fire Brigades Union believe that the LCO should reflect the British Standard and reframe the term 'residential premises' to 'domestic

occupancy' as defined in the British Standard for Domestic Sprinklers 9251: 2005. Section 3.7 of BS 9251: 2005.

We believe that the term 'automatic water suppression system' would be a more appropriate term to use, rather than the term 'sprinkler system'.

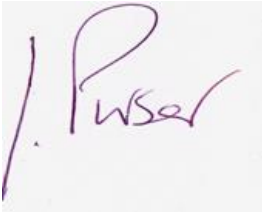
Conclusion

This LCO must succeed, we cannot continually ignore the issue of automatic water suppression system being fitted into all new build premises, because of a comparatively small cost implication. A person's life is worth more than a shareholder's dividend payment.

In the words of Ann Jones, "Imagine having a firefighter in every room in your home, 24 hours a day, 365 days a year—that is what sprinkler systems are; they are instant firefighters".

This LCO has the potential to eradicate fire deaths in the home, in Wales, we need to ensure this opportunity is not wasted.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'J. Purser', is shown on a light-colored background.

John Purser

Brigade Secretary - North Wales