

DFS(3)-04-08 (p2)

Dear Mr Lewis

Public Consultation - Proposed Domestic Fire Safety LCO Committee

Thank you for your letter of the 19th March, inviting the National Fire Sprinkler Network to submit evidence to the Scrutiny Committee, and further, that I have also been asked to attend, along with other colleagues, to give oral evidence to the Committee, on the 22nd April 2008.

As a former Chief Fire Officer in Wales, and a contributor to the 2002 "Wired for Safety" document, I must applaud the Welsh Assembly in its visionary and realistic approach to seek to bring about this further safety measure, for the people of Wales, where accidental fire deaths are in the upper quartile of UK fire statistics per 100,000 population.

The excellent research conducted by the Fire & Rescue Services in Wales, has identified those who are dying in fires in Wales are from a narrow age band and well defined socio-economic group. Clearly the installation of Smoke Alarms and community education, has failed to impact on this group, and we concur with the views expressed by the Fire & Rescue Services, that Sprinklers are the only way to reduce further the rate of fire deaths.

It is therefore the considered view of the National Fire Sprinkler Network, that transferring legislative competence to the Assembly, in the areas identified in Matter 11.1 of the proposed Draft Order, relating to Building Regulations and Fire Safety, is entirely appropriate.

Given that the issues affecting the people of Wales, differ from those in other parts of the UK, it would seem right and proper for Wales to be able to determine the measures necessary to achieve its own fire safety needs and objectives.

Where such measures have been taken in Vancouver (Canada) and Scottsdale (USA), there are recorded significantly lower fire death rates than those currently in Wales, and elsewhere in the UK.

It is our understanding that the proposed Order will result in all new dwellings in Wales being fitted with fire sprinklers, and the wording in the Order, would seem to us, to likely produce that result.

However it is felt that the terms of the order could be extended to the needs of the occupants of Care premises, such as Homes for the elderly or those with disabilities. For example, 700,000 people in the UK have dementia, and 244,000 of these live in care homes. UK fire statistics demonstrate that these groups of people are at greater risk in a fire than others, and it would be an opportunity missed, if sprinklers were not installed also in housing for them.

(Scotland has already introduced such legislation in its Care Homes).

It would be our contention that fitting sprinklers in all new housing and care homes would make many more buildings safe from fire for the elderly and disabled, helping them to live more independent lives. We also believe that evidence shows that it is easier and more convenient for the occupants of care homes to get around sprinklered homes as some of the obstructions to daily life imposed by the existing fire precautions regime can be waived when sprinklers are present.

We do not believe that it is necessary to define 'new residential building' but it might be simpler to tie in this part of the Order to the existing application of the Building Regulations which defines closely the premises to which they apply.

We would suggest that there be a change in the wording of the Order as

finally drafted to ensure that this includes 'single family dwellings, residential buildings such as blocks of flats which house more than one family, homes in multiple occupation, homes designed and intended to accommodate the elderly, those suffering from a physical or mental disability and children's homes.

You ask whether it would be necessary to clarify what is meant by a sprinkler system. We do not think this poses a particular problem as there is a well-established national standard. Adherence to this would facilitate the installation of the systems in a cost-effective way and will ensure that over-design and more importantly under-design are avoided. Over time this standard will be regularly revised as new technology becomes available.

Accordingly, we suggest that the Order should specifically refer to 'sprinklers for residential and domestic premises, designed and installed in accordance with BS 9251:2005 "Sprinkler systems for residential and domestic occupancies. Code of Practice, "or its successor standards.

I trust that these comments are helpful to your committee's considerations, and I shall look forward to giving further clarification on the 22nd April.

Yours sincerely

Ronnie King OBE, Ost.J, QFSM, F.I.Fire E
Vice Chair/Treasurer
National Fire Sprinkler Network