

DFS(3)-04-08 (p3)

Huw Lewis AM,
Chair, Domestic Fire Safety LCO Committee
National Assembly for Wales
Cardiff Bay
Cardiff
CF99 1NA

7 April 2008

Dear Mr Lewis,

Public Consultation - Proposed Domestic Fire Safety LCO Committee

Thank you for your letter of 19th March and for your invitation to this association to submit evidence to the Committee. You will be aware that, together with colleagues from other organisations I will be giving oral evidence to your committee on 22nd April.

It is the view of this association that transferring legislative competence in matters concerned with building regulations and fire safety to the Assembly is entirely appropriate, timely and commensurate with the role of the Assembly. We believe that fire safety is best managed at the lowest level of government appropriate to the function. Given that the issues affecting the people of Wales differ from those affecting 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.

First class research by the fire and rescue services in Wales, most notably by North Wales, has identified that those who are dying in fires in Wales are from a narrow age band and well-defined socio-economic group. It would appear that other measures such as provision of smoke alarms and community education have failed to impact on this group. We therefore concur with the views expressed by the fire and rescue services that the only way to reduce the rate of fire deaths is through the wider use of sprinkler systems.

While Wales could be the first jurisdiction in Europe to take this step, several other jurisdictions, including the City of Glasgow are also considering whether to require sprinklers in new housing. Cities and jurisdictions in North America which require sprinklers in all new housing have recorded significantly lower fire death rates than those presently experienced in Wales or, indeed, anywhere else in the United Kingdom.

We understand that the proposed Order will result in new dwellings in Wales being fitted with sprinklers. The wording of the Order, as far as we can determine should produce this result. We question however, whether consideration should not also be given to the needs of the occupants of care premises, such as homes for the elderly or those with disabilities. UK fire statistics demonstrate clearly that this group of people are at greater risk in a fire than others and it would be an opportunity missed if sprinklers were not also installed in housing for them. You will be aware that the Scottish Government has already enacted legislation requiring just this protection

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. We do not believe that it would be necessary for the Order to include school boarding houses as there have been no fatalities from fire in such premises since current record keeping started.

We note that 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.

We congratulate the Welsh Assembly in its far-sighted and realistic approach to promoting the safety of the people of Wales. We believe that the Order is an excellent initiative and will lead to a significant reduction in fire deaths in Wales, holding up an example to the rest of the UK and Europe of what can be achieved.

Your sincerely,

Stewart Kidd MA, MSc, FIFireE, FIFSM
Secretary-General