

DFS(3)-06-08(p1)

Dear Mr Lewis

Proposed Domestic Fire Safety LCO Committee

Thank you for the invitation to submit evidence to the Proposed Domestic Fire Safety LCO Committee in respect of the proposed National Assembly for Wales (Legislative Competence) (No.7) Order 2008, relating to fire sprinkler systems in new residential premises.

The WLGA supports moves by the National Assembly to help further improve fire safety in the home and recognises the benefits of sprinklers in reducing fire related deaths and damage to property caused by fire. Information highlighted in the Draft Explanatory Memorandum clearly provides positive evidence of the reduction in fire deaths that have followed installation of fire sprinklers and this is to be welcomed. However, the proposed Order does raise some administrative, operational and financial issues which should be considered by the Committee.

Firstly, consideration needs to be given to the administration of any requirement to install sprinkler systems in new residential premises. Local Planning Authorities do not deal with internal design issues and as such it would seem sensible that this duty be given to Building Regulations. However, the National Assembly does not currently have legislative competence in this area (although I understand that this matter is under discussion).

Secondly, we have some concerns regarding the cost of installation and maintenance of sprinkler systems. As Committee members will be aware, increasing the amount of affordable housing to buy and to rent across all parts of Wales is a priority issue to ensure there is an adequate supply of housing to meet identified need. There is a need to consider the impact of the increased costs (which is recognised to be a small percentage of the overall cost of building new premises or converting the use of properties) on the ability of house builders (in both the private and public sectors) to develop affordable homes. Similar concerns, in relation to ensuring access to housing is affordable, are also highlighted in relation to the on-going maintenance costs. Is there any evidence available or lessons to be learnt about any potential impact on housing build that can be drawn from the studies that have been used to evidence the positive benefits? While these concerns are not major barriers, it is suggested that further consideration could be given to these issues to ensure that the important need for more affordable and quality housing in Wales does not suffer as a consequence of these additional financial burdens. Consideration also needs to be given as to how the maintenance of installed systems will be undertaken and regulated.

We also request clarification of the term 'significant alteration' as used in relation to the scope of the LCO. While the definition of 'new residential premises' seems clear, on page 7 of the Draft Explanatory Memorandum it refers to 'existing residential premises under-going significant alteration'. While examples given are conversions of single dwellings to HMO's, is it the view of the Committee that homes receiving improvements to ensure they meet the Wales Housing Quality Standard, in some cases requiring significant improvements, would also fall within the scope of this LCO?

I hope that the comments provided are useful to the Committee. Should you require any further information, please do not hesitate to contact me.

Yours sincerely



Steve Thomas

Chief Executive/Prif Weithredwr