

Senedd Cymru | Welsh Parliament

Y Pwyllgor Llywodraeth Leol a Thai | Local Government and Housing
Committee

Bil Diogelwch Adeiladau (Cymru) | Building Safety (Wales) Bill

**Ymateb Gan: Anthony Friis, Associate Director, Cast Consultancy | Evidence from:
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Please use this template to draft your response and email your response to SeneddHousing@senedd.wales

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You do not need to answer every question, only those on which you wish to share information or have a view.

1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?

1. Cast Consultancy fully support the intention of the Bill to improve the safety of building users. The findings of the Grenfell Inquiry clearly showed the need for this Bill to ensure that the process of design, construction and management of in-scope buildings is significantly improved, with duty holders responsibilities clearly defined.

2. What are your views on the provisions set out in Part 1 of the Bill – Safety of buildings containing two or more residential units (sections 1 -66 and Schedule 1)? In particular, are the provisions workable and will they deliver the stated policy intention?

2. Section 6 defines the three categories of ‘regulated building’, and then goes on, in 6 (6), to note that these are subject to further definition. These definitions must be clearly defined, preferably in legislation, or by the building safety authority *at the outset* to provide absolute clarity on the route to approval, as it will have an impact on viability of a new development.

The legislation must provide absolute clarity on the information needed to make applications for approvals and the oversight body, the Building Safety Authority, must be provided with sufficient skilled resource to enable them to review and approve applications in a reasonable timescale: England has seen a significant

reduction in HRB developments as a result of due the lack of understanding what documents needed to be submitted and the timescale for review and approval – in cases, over 12 months.

3. What are your views on the provisions set out in Part 2 of the Bill – Fire safety in certain houses in multiple occupation (sections 67 – 80)? In particular, are the provisions workable and will they deliver the stated policy intention?

3.

4. What are your views on the provisions set out in Part 3 of the Bill – Enforcement and investigatory powers (sections 81 – 97 and Schedule 2)? In particular, are the provisions workable and will they deliver the stated policy intention?

4.

5. What are your views on the provisions set out in Part 4 of the Bill – Supplementary and general (sections 98 – 114 and Schedules 3-4)? In particular, are the provisions workable and will they deliver the stated policy intention?

5.

6. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

6.

7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation, as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

7.

8. Are there any unintended consequences likely to arise from the Bill?

As stated in response to question 1, Cast are fully supportive of the legislation, however we have seen a significant impact on construction of new homes in High Risk Building in England which has had a knock-on effect on the economy. The Welsh Government must full consider and clarify the process by which

applications are made, to whom, the information required to be submitted and help establish the correct resources to assess the applications.

9. What are your views on the Welsh Government's assessment of the financial implications of the Bill, as set out in Part 2 of the Explanatory Memorandum?

8.

10. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?

The Bill does not set out any transitional arrangements or the timescale for implementation. This must be carefully considered alongside the available infrastructure and resources required, and any adverse impact on the programme of the social housing along with inward investment for Build to Rent and Student Accommodation projects in our cities.