

Plenary 5:

A review of under provision and over provision of fire safety requirements within social housing

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Chaired by: Stephen Chalmers, Kingsdale Group

Room: Ballroom



National Housing Maintenance Forum

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A review of overprovision and under provision of fire safety requirements in social housing

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Technical Director



Legislative changes

- Before the Fire Safety Order, the Housing Act was predominant legislation in general housing needs.
 - CP3 and BS 5588 Part1 for purpose built premises
 - Houses in Multiple Occupation (HMO) – Converted premises.
 - Additional Regulation
 - Circular 12/92 to Housing Act – Fitness standards
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Legislative changes

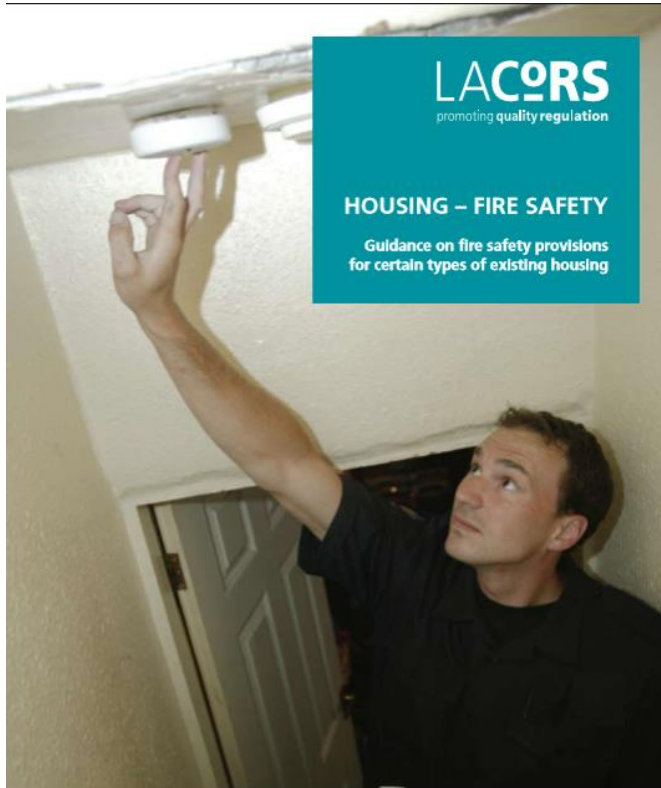
- Review of Housing Act 2004 by ODPM
 - Removes Circular 12/92 fitness standards
 - Introduces Housing Health and Safety Rating System (HHSRS)
 - Guidance for fire safety under HHSRS lacks detail in lieu of guidance to be issued under imminent introduction of Regulatory reform (Fire Safety) Order 2005 by ODPM
 - Legislative overlap between Fire Safety Order and Housing Act in relation to common parts.
 - Extent of common parts and powers of entry issues.
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Guidance



- Issued on commencement of Regulatory Reform (Fire Safety) Order 2005 giving guidance to responsible persons undertaking fire risk assessment.
- Provides general guidance on assessment of all sleeping risk covered by Fire Safety Order including commercial, non dwelling type premises.
- Considered too general in many instances

Guidance



- Developed for converted premises which do not conform to Building Regulations of 1991 or later.
- Provides additional detail not covered by CLG guidance
- Relates predominantly to dwelling type premises, but also small hostels.

Lakanal House



- 6 fatalities
- 15 residents injured
- 1 fire fighter injured
- 40 residents assisted to safety by Fire and Rescue Service
- 90 families had to vacate home as a result
- **Signalled significant change in enforcement attitudes**

Prevailing standard in existing tower blocks

BSI CP3:CH4IV: PART 1 75 ■ 1624669 0294375 1 ■

BRITISH STANDARD CODE OF PRACTICE
CP 3: CHAPTER IV : Part 1 : 1971

UDC 721.01+728.2 : 609.81 : 614.841

CODE OF BASIC DATA FOR
THE DESIGN OF BUILDINGS

CHAPTER IV
PRECAUTIONS AGAINST FIRE

**Part 1. Flats and maisonettes
(in blocks over two storeys)**

THE COUNCIL FOR CODES OF PRACTICE
BRITISH STANDARDS INSTITUTION

- Originally written in 1947 following Post War Building Studies.
- Premises have undergone substantial changes over their lifetime
- Not always undertaken sympathetically with fire safety requirements for the premises.

Guidance



Fire safety in purpose-built blocks of flats

Environment, housing,
planning and waste



- Developed in response to Lakanal House fire and the issues raised.
- Does not introduce any additional measures.
- Expands and seeks to clarify issues surrounding stay put policy in purpose built flats and sheltered housing.
- Provides greater detail not included in CLG guidance
- Assists benchmarking of existing standard

Guidance



The Building Regulations 2010

Fire safety

APPROVED DOCUMENT

B

VOLUME 2 – BUILDINGS OTHER THAN DWELLINGHOUSES

B1 Means of warning and escape
B2 Internal fire spread (linings)
B3 Internal fire spread (structure)
B4 External fire spread
B5 Access and facilities for the fire service

Came into effect April 2007




For use in England*

2006 edition
incorporating 2007,
2010 and 2013
amendments

- Standard to which all new buildings should comply, including blocks of flats, with the exception of single dwelling houses which are covered by Volume 1
- Meeting standard deemed to ensure compliance with Fire Safety Order.
- Provisions often not considered along with on-going management.

Common problems

- Original construction did not comply with standard
 - Second fix problems
 - Subsequent refurbishment of
 - Heating systems
 - Electrical rewire
 - Kitchen/bathroom upgrades
 - Venting
 - Cable TV/Satellite TV/Telephone system
 - Uncontrolled work by leaseholders
 - Lack of audit trail of work undertaken
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Fire doors



- Notional FD30s
- Upgraded FD30s
- Replacement FD30s
- Replaced by tenant
- Self closing devices



Compartmentation



- Substantial problems occur at build stage.
- Approvals process under strain and not always able to identify problems.
- Undermines stay put policy and overall emergency strategy for premises.

Fire stopping




- Problems hidden at first build stage.
- Second fix and refurbishment standards degrade original standard.
- Contractors and responsible persons unaware of the importance of structure integrity

Venting




- Original construction vents poorly fire stopped.
- Vents fitted during refurbishment of kitchens and bathrooms terminating in roof spaces.
- Provides pathway for spread of fire

Fire alarm provision

- Under provision in converted premises and HMOs which are operated under stay put policy
 - Lack of confidence in constructional standard requires full evacuation and appropriate fire alarm provision to facilitate this.
 - Over provision in general needs flats operating stay put policy.
 - General alarm results in conflicting action between stay put policy and tenants compelled to react to general alarm.
 - Smoke alarm provision in flats
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Demonstrating on-going compliance

- A completed fire risk assessment is the **beginning** of the process and **not the end**
 - Article 9 (3) states regular review of the significant findings of the assessment is required
 - Principles of Article 10 requires knowledge and progress of the outcomes and actions of assessment to be applied in the spirit and meaning of the Fire Safety Order
 - Significant challenge where extensive portfolio of premises exists, increasing risk of enforcement action
 - **Nullogic system delivers the high level of management of significant findings identified and delivers on going compliance**
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And Finally

- Your buildings and residents are your greatest asset – you have an obligation to keep both safe!
- Fire related incidents occur – are you confident you can demonstrate to the enforcing authority you have taken every precaution to manage them?
- This question will be one of the first asked of you!
- If you have any doubt about your response please take advice

Visit us on Stand 31 where we will be more than happy to talk to you about your needs and concerns