



NFCC
National Fire
Chiefs Council

The professional voice of the
UK Fire & Rescue Service

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David Stewart MSP
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Scottish Parliament
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Sent via email to: David.Stewart.msp@parliament.scot

16 April 2018

Dear David,

On behalf of the National Fire Chiefs Council, thank you for your email of 14 March 2018 inviting the NFCC to respond to your consultation on a Proposed Social Housing (Automatic Fire Suppression Systems) (Scotland) Bill.

Please find attached our response. The NFCC is the professional voice of the UK fire and rescue services, and is comprised of a council of all UK Chief Fire Officers.

This submission was put together through the NFCC's lead on Automatic Suppression Systems, with reference to our national [position statement on sprinklers](#), and has been shared with Scottish Fire and Rescue Service colleagues.

Any further correspondence in relation to the response can be directed to Penny Pender via info@nationalfirechiefs.org.uk.

Yours sincerely,

Mark Hardingham
Chair, Protection and Business Safety Coordination Committee
National Fire Chiefs Council

Response to consultation by David Stewart, MSP for the Highlands and Islands January 2018 on the Proposed Social Housing (Automatic Fire Suppression Systems) (Scotland) Bill

ABOUT YOU

1. Are you responding as:

- An individual – In which case go to Q2A
 On behalf of an organisation? – In which case go to Q2B

2A. Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose “Member of the public”.)

- Politician (MSP/MP/peer/MEP/Councillor)
 Professional with experience in a relevant subject
 Academic with expertise in a relevant subject
 Member of the public

2B. Please select the category which best describes your organisation:

- Public sector body (Scottish/UK Government or agency, local authority, NDPB)
 Commercial organisation (company, business)
 Representative organisation (trade union, professional association)
 Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)
 Other (e.g. clubs, local groups, groups of individuals, etc.)

3. Please choose one of the following:

- I am content for this response to be attributed to me or my organisation

Please provide your name or the name of your organisation as you wish it to be published:

Name: The National Fire Chiefs Council

4. Please provide details of a way in which we can contact you if there are queries regarding your response. (Email is preferred but you can also provide a postal address or phone number. We will not publish these details.)

Contact details: info@nationalfirechiefs.org.uk

Q1: Which of the following best expresses your view of requiring fire suppression systems (i.e. fire sprinklers) to be fitted in new-build social housing?

Answer: Fully Supportive

Commentary on Q1

The National Fire Chiefs Council would support the proposed Bill, which takes a pragmatic approach to the introduction of sprinklers in the home.

Starting with social housing is a proportionate approach likely to complement risk data collected by Fire and Rescue Services. Evidence suggests that the social housing sector will experience a higher proportion of fires in comparison to non social housing, and therefore this approach is risk based and proportionate.

Q2: Which of the following best expresses your view of requiring fire sprinklers to be retrofitted into housing owned by social landlords which is located in high-rise buildings built prior to 2005?

Answer: Fully Supportive

Commentary on Q2

The NFCC would support retro fitting of sprinklers in social housing above 18m.

Fires in high rise buildings can pose more challenges than those in low rise properties. They can involve more physical effort to fight, and can require more resources and specialist equipment to ensure safe systems of work for firefighters. Over the years fires in high rise properties have claimed the lives of firefighters.

Sprinklers can make the environment safer for the occupants and the firefighters when fires occur.

Our members' experience suggests that social housing in high rise premises can attract demographics more prone to fires, such as those from poorer backgrounds, and increasingly the elderly. An aging population increases the risk of fire. When this is combined with buildings that can pose an increased risk when fire occurs, sprinklers can be an effective and proportionate mitigating measure against these increased levels of risk.

Q3: Do you think that there are other steps which could be taken (either instead of, or in addition to legislation) to achieve the aims of the proposal?

Answer: No

Commentary on Q3

Other fire safety features are not likely to provide the same level of protection as a sprinkler system.

The only way to mandate their use is through legislative change and changes to building regulations.

Q4: Taking account of both costs and potential savings, what financial impact would you expect a requirement to include fire sprinklers in new-build social housing to have on:

(a) Government and the public sector

Answer: Some increase in cost

(b) Businesses

Answer: Some increase in cost

(c) Individuals

Answer: Some increase in cost

Commentary on Q4

Ultimately sprinkler systems will create a cost for building projects. We would expect some costs to be incurred by all three categories in the questionnaire.

However, over the lifetime of a building, there are other savings likely to be realised such as fewer deaths and injuries, and from buildings remaining habitable after a fire.

Costs for new build projects may be absorbed into the cost of a project more easily than retro fitting.

Q5: Taking account of both costs and potential savings, what financial impact would you expect a requirement to retrofit fire sprinklers in housing owned by social landlords which is located in high-rise buildings built prior to 2005?

(a) Government and the public sector

Answer: Some increase in cost

(b) Businesses

Answer: Some increase in cost

(c) Individuals

Answer: Broadly cost-neutral

Commentary on Q5

As above, we would expect costs across the categories, and retro fitting can be more expensive than new installations.

However, there are examples of retro fitting such as Callow Mount in Sheffield that have proven the viability of retro fitting (see the NFCC position statement referenced above for relevant links).

The NFCC would recommend a risk assessment exercise is carried out across Social Housing building stock to assess the type and layout of the buildings, number of staircases, occupancy demographics, previous history for fires etc, which could inform a schedule to address the buildings in risk order for retro fitting.

Project costs can also be minimised, for example, by installing sprinkler systems at the same time as existing scheduled refurbishments (such as new heating systems) to cut down on duplication of associated project costs, and minimise occupant disruption.

Q6: Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)?

Answer: As per question 3

Q7: What overall impact is the proposed Bill likely to have on equality, taking account of the following protected groups (under the Equality Act 2010): race, disability, sex, gender re-assignment, age, religion and belief, sexual orientation, marriage and civil partnership, pregnancy and maternity?

Answer: Neutral (neither positive nor negative)

Commentary on Q7

If all new social housing is being addressed there do not appear to be any equality issues.

People falling into protected characteristics due to age and/or disability are likely to benefit from the addition of sprinklers in a positive way.

This could be a factor in risk assessments when determining priority order for retro fits.

Q8: In what ways could any negative impact of the Bill on equality be minimised or avoided?

See Q7 above

Q9: Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

Answer: Yes

Commentary on Q9

The main costs will be for retro fitting and the rate at which it takes place. If the building stock is risk assessed and a long term plan is created to address the backlog over an extended period, then costs could be spread out.

Q10: Do you have any other comments or suggestions in relation to a requirement for fire sprinklers to be fitted in new-build social housing?

Answer: See the NFCC position statement on Sprinklers:

https://www.nationalfirechiefs.org.uk/write/MediaUploads/Position%20statements/Protection/AWSS_Position_statement.pdf

Q11: Do you have any other comments or suggestions in relation to a requirement to retrofit sprinklers into housing owned by social landlords which is located in high-rise buildings built prior to 2005?

Answer: As above.