

Legislation Committee No.1

Response to the consultation on the Proposed Domestic Fire Safety (Wales) Measure

Welsh Local Government Association



Our Ref/Ein Cyf: NA/RM
Your Ref/Eich Cyf:
Date/Dyddiad: 31 August 2010
Please ask for/Gofynnwch am: Naomi Alleyne

Rosemary Butler AM
Committee Chair
Legislation Committee No 1
National Assembly for Wales
Cardiff Bay
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Dear Chair

Proposed Domestic Fire Safety (Wales) Measure

Thank you for the opportunity to contribute to the consultation on the general principles of the Proposed Domestic Fire Safety (Wales) Measure.

The WLGA supports moves by the National Assembly to help further improve fire safety in the home and recognises the benefits of sprinkler systems in reducing fire related deaths and injuries and damage to property caused by fire. Information provided in the Explanatory Memorandum provides positive evidence of the reduction in fire deaths that have followed the installation of sprinkler systems and this is to be welcomed.

The WLGA does, however, hold some concerns regarding the impact of the Measure. Firstly, as Committee Members will be aware, increasing the amount of affordable housing to buy and rent across Wales is a priority issue to ensure that there is an adequate supply of housing to meet identified need. As such there is a need to consider the potential impact of the cost of installation of sprinkler systems on house builders and developers of affordable homes - the Explanatory Memorandum estimates this cost for Registered Social Landlords

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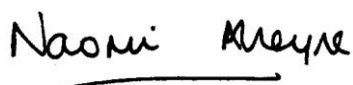
(RSLs) as between £0.5 and £3.3 million a year and for private landlords and home owners a cost of between £6.4 million and £15.5 million (£978 - £1,710 per dwelling). What impact will this have on the amount of affordable homes built? It is also recognised, however, that the installation of sprinklers in new dwellings will also save money (in addition to saving lives). As such, the WLGA does not regard the costs of installation as prohibitive, but believes that the cost implications should be identified and noted, particularly in the current economic climate.

Secondly, the WLGA has some concern regarding the cost to Local Authorities. Again, the Explanatory Memorandum estimates that as installation would be approved alongside the Building Regulations process, this would not be significant and the net expenditure by Local Authorities in Wales on building control would only at most see a minor increase. While this may indeed be the case, again, the WLGA believes that it is important to point out the potential cost implications particularly during the current economic climate when local authorities are facing significant budgetary cuts over a sustained period.

On a final point, while maintenance is not covered in the scope of the Measure, ensuring appropriate and ongoing maintenance of the sprinkler systems will be important and without this the aim of the Measure would be undermined. Further clarity on this point would be helpful and the intention of the Assembly regarding responsibility for inspection and maintenance needs to be clearly set out.

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



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