

Legislation Committee No.1

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

Persimmon Homes West Wales

September 2010

Persimmon Homes West Wales have been in discussion with our representatives at the House Builders Federation ahead of the proposed fire safety measure agenda due to take place later this year at the Welsh Assembly Government. We are fully supportive of a positive and safety conscious progression on the construction of new housing and are fully committed through new or amended legislation in ensuring the continued safety and welfare of our customers in new housing and indeed the wider public in existing the housing stock.

We are conscious of the current position with respect to the statistics being discussed in relation to death & serious injury from fire to properties in South Wales. This is discussed in some depth in the House Builders Federation report due to be submitted to you as part of the same consultation process. We are concerned that some of the statistics being discussed are not wholly reflective or specific to new housing and indeed what we consider to be new housing stock since the requirement & introduction of mains operated smoke detectors to new build properties back in 1992. Since this time the regulations have become more rigorous and any measure that is brought in as a consequence to this consultation process should categorise and identify the risks between what should be considered higher risk properties, pre 1992 and those deemed to be lower risk properties, post 1992.

We have identified a select criteria of issues that need to be specifically addressed when considering the Domestic Fire Safety Measure. These are discussed in the following items;

1. How effective will the introduction of new legislation be on addressing and actively reducing the victims of fire and the associated statistics year on year? The argument here relates to the types of properties falling victim to fire damage. Are these new housing or older housing stock.
2. Who is most at risk in society when considering the new proposed measures? These are detailed in the HBF report as carried out by the Department for Communities and Local Government DCLG as being Single middle aged people who drink & smoke, single female parents, disabled/impaired, the elderly & young people including students.
3. There is concern over false activation of the sprinkler systems. Who will maintain & service such a device. It could be detrimental to household & contents insurances. Possible issues relating to claims when servicing apparatus hasn't taken place. This is further supported by the Council for Mortgage Lenders (CML) who are in agreement that if household boilers are

currently not maintained by much of the population with all the dangers that they potentially bring, it is highly unlikely that sprinkler systems will be regularly maintained by home owners.

4. There is a cost implication relative to house price that needs to be considered. A sprinkler system will be expensive to install on a lower priced home priced at around £80,000 in the market compared to that of a £500,000 house. An argument here can be linked back to who the most vulnerable are in society and what properties they would occupy in the market place pricing bracket.
5. A view needs to be taken on whether the changes will make any impact on reducing the current statistics of existing housing stock fire damage from new housing stock (post 1992) with mains operated smoke alarms.
6. We are informed that there would be an issue with the types of materials used for piping & ducting of the apparatus used for the sprinkler systems. Copper & plastic would be ineffective due to the temperature of the environment. Steel may be a possibility but loadings & heat pressure testing would need to be thoroughly investigated.
7. We should consider current building materials & requirements relative to older construction materials & techniques. Our current timber frame construction for example uses a fire retardant chemical on the timber and the rigid phenolic foam insulation used in the walls is fully fire proof.

We understand and emphasise that fire detection, means of escape and safety for the individuals located within properties is primarily about early detection, warning & escape. We are weary of the consequences of fitting properties with a domestic style sprinkler system due to the possible & probable malfunctions and associated problems that this may bring. When considering a way forward on the topic area, we would suggest the following means of improvement as a more favoured approach;

1. A mains operated smoke/heat detector located in every room within a dwelling.
2. Providing fire rated doors to all habitable rooms within a dwelling.
3. Upgrading current plasterboard specification and/or thickness on all walls, ceilings & partitions to provide half hour protection throughout dwelling. Alternatively, use fire rated plasterboard throughout all dwellings.
4. Provide a fire proof staircase to 2 storey properties not just 3 storey and above as current legislation provides.
5. Address the main cause and problem area of the statistics available to us which is upgrading existing older housing stock. Provide battery operated smoke detectors and mains operated where possible.