improving living in scotland

HOMES FOR SCOTLAND

PROPOSED SOCIAL HOUSING (AUTOMATIC FIRE SUPPRESSION SYSTEMS) (SCOTLAND) BILL

16 APRIL 2018

About Homes for Scotland

Homes for Scotland is ***the*** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

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Proposed Social Housing (Automatic Fire Suppression Systems) (Scotland) Bill Recommended Consultation Response

Aim & Approach

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? (Please explain the reasons for your response, including what you see as the advantages or disadvantages.)

Neutral

Homes for Scotland (HFS) is focused on the sustainable growth of housing delivery across Scotland in order to meet the needs and aspirations of Scotland's people. We aspire to ensure that policy is developed collaboratively across public and private sector stakeholders, helping minimise any risk to the deliverability of much needed new homes.

Grenfell has served as a reminder of the devastating impact domestic fires can have on individuals and communities across the UK. Whilst the number of domestic fire-related incidents (and associated deaths and injuries) has reduced considerably over the long-term, we recognise that action is required to reduce the disproportionate risk of being involved in a domestic fire in Scotland. Whilst the value of any lives saved can never be underestimated, we must ensure that any new regulation is well considered, evidence-based, and the impact fully assessed. In that context, HFS supports the underlying intention behind the proposed Bill, however we believe that further work is required to better understand the causes of increased fire risk in Scotland. Consideration should be given to all available solutions that could be adopted to reduce fire risk, and the development of targeted approaches that could provide a cost-beneficial way to achieve the primary policy objective. Furthermore, HFS believes that full consideration should be given to the conclusions and recommendations of the Scottish Government's Working Group on Building and Fire Safety.

The research cited within the consultation paper indicates that there are a range of factors which can increase the risk of being involved in a domestic fire in Scotland, and that this risk increases in areas of social and economic deprivation. In that context, it would be helpful to consider a range of interventions that could be implemented to more directly target the underlying reasons behind increased fire risk in Scotland.

Consideration may also be given to how a building may be designed and constructed in a way to further minimise fire risk. Building Standards currently require that all new dwellings that form part of a sheltered housing complex, residential care building, and high-rise domestic buildings (over 18m) are fitted with automatic life safety fire suppression systems. New domestic buildings must also be designed and constructed in such a way that an occupant is alerted of an outbreak of fire[1], safe routes of escape are provided[2], and Fire and Rescue Services have safe access to and within a building[3]. Further consideration should be given to how greater fire protection could be achieved within a dwelling including what available materials and specifications could be adopted to achieve the intended objectives.

[1] Occupants are alerted of an outbreak of fire through a fire detection and alarm system (which must include at least one smoke alarm installed in the principal habitable room; at least one smoke alarm in every circulation space on each storey of a building; at least one smoke alarm in every access room serving an inner room; and at least one heat alarm installed in every kitchen). Further consideration is given to the type of alarm and sensor as well as location of detectors. All smoke alarms and heat alarms in a dwelling should be interconnected.
[2] Occupants are provided an opportunity to escape from a building safely before being affected by fire or smoke.
[3] Fire and rescue services are provided with safe access to and within a building and are provided with facilities that assist fire-fighting or rescue operations.

Research undertaken on behalf of the Scottish Government[4] concludes that the installation of fire sprinklers would not be justified on cost-benefit grounds for most types of residential property, with analysis indicating that cost-benefit is only achieved on flatted developments and where risk and benefit is assumed to be greatest. In that context, it suggests that targeted installation to protect vulnerable groups and those most at risk would be most cost-effective.

Alongside consideration of the cost-effectiveness of available solutions, the proposed Bill should also give consideration to its potential influence on other policy areas. The Scottish Government research estimates that the average cost to install a fire sprinkler in a new build homes is around £2,475 and that average maintenance costs would equate to £131 per annum. Applying these figures against 2016-17 social housing approvals[5] provides a rough estimate of the impact such legislation could have on the sector. On that basis, it is estimated that the sector would have incurred additional costs of around £16.9 million and an annual maintenance requirement of £681,130. In that context, consideration should be given to what impact this Bill would have on affordable housing delivery as well as whether additional budget would be made available to increase existing grant subsidies to cover the expected increase in costs.

Whilst we support the underlying intention of the Bill, we currently remain unconvinced as to whether the Bill proposes the right type of action or whether alternative targeted solutions would provide a more cost-effective approach to protecting the safety of Scotland's people. In that context, HFS remains neutral on this issue, believing that further work is required to fully understand the impact of this Bill.

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? (Please explain the reasons for your response, including what you see as the advantages or disadvantages.)

Neutral

It is recognised that retrofitting all social housing with fire sprinklers would require significant investment from public and private bodies. The Scottish Government Household Survey estimates that around 23% of households in Scotland are social rent, which represents around 563,500 homes[6]. On that basis, it is assumed that the retrofit programme would cost £1.8 billion to deliver and that a further £74 million of annual maintenance costs would need to be borne by affordable housing providers. Consideration should therefore be given to the costs and potential impact the proposed Bill may have on affordable housing delivery in Scotland.

We believe that it would be helpful to further assess the potential impact the Bill may have on funding of future affordable homes and consider the full range of approaches that could be undertaken to minimise fire risk for those in existing buildings in Scotland, while acknowledging the need to continue funding new supply.

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? (Please explain the reasons for your response.)

Yes

[4] Optimal Economics, "Research Project to review the Cost Effectiveness of Sprinklers in Residential Properties", May 2015.
[5] Scottish Government, "Affordable Housing Supply Programme Out-turn Report 2016-17", January 2018.
[6] National Records of Scotland, Household Estimated for Scotland, 2018.

We believe that it is necessary to undertake further research to better understand the underlying reasons and causes of the increased risk of domestic fire in Scotland. In that context, more work should be done to examine all potential solutions to reducing fire risk that would go some way to meeting the overall objective, as well as an assessment undertaken to understand the impact the proposals may have on a range of relevant policy areas. Further consideration could be given, for example, to reviewing regulations and standards in relation to electrical appliances and provisions within tenancy agreements.

Financial Implications

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 (Please explain the reasons for your response:
Government and the public sector

Some increase in cost.

From the Scottish Government research it can be estimated that the average cost to install a fire sprinkler system in a new home is £2,475 per unit and that average annual maintenance costs are £131. Applying these costs against 2016-17 social housing approvals indicated that local authorities could have needed an additional £4,041,675 to deliver the equivalent number of units with fire sprinklers and a further £213,923 would be required annually to maintain the system.

If the Scottish Government agreed to increase grant subsidy for RSLs to cover the installation costs it is estimated that an additional £12.8 million could be required each year to deliver the equivalent number of units.

Businesses

Significant increase in cost.

It is estimated that the proposals would increase the average cost of constructing a social rented home from £129,576 to £132,051. Without additional grant subsidy this would equate to a £12.8m cost to the sector to deliver an equivalent number of units as in 2016-17. This would also equate to an additional £679,497 in annual maintenance costs for providers.

Individuals

Unsure

Whilst no direct costs relating to the installation of fire sprinklers would likely be passed on to individuals, the ongoing increased maintenance costs may have an impact on rents.

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? (Please explain the reasons for your response.)

Government and the public sector

Significant increase in cost

A retrofitting programme is expected to require significant investment from the Scottish Government and other public-sector bodies. With it estimated that social rent accounts for 23% of Scottish

households (around 563,500 homes), it is assumed that this could cost in the region of £1.8 billion to deliver. A further annual investment of £74 million could be required to undertake maintenance.

Businesses

Significant increase in cost

Without any detail of how any programme would be funded and what level of grant would be available to support a retrofitting programme, it can only be assumed that this policy could have a significant impact on the sector given the significant installation and annual maintenance costs associated with such systems. Additional costs may be incurred where a tenant has to vacate their home for the duration of an installation.

Individuals

Unsure

Whilst no direct costs relating to the installation of fire sprinklers would likely be passed on to individuals, the ongoing increased maintenance costs may have an impact on rents.

Are there ways in which the Bill could achieve its aim more cost-effectively (e.g. by reducing costs or increasing savings)? (Please explain the reasons for your response.)

The objectives of the Bill may be more cost-effectively achieved where further work is undertaken to evaluate alternative solutions to improving fire protection within a dwelling or where a more targeted approach is adopted to protect those most vulnerable and likely to be involved in a domestic fire.

Equalities

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? (Please explain the reasons for your response.)

No Comments

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

No Comments

Sustainability

Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts? (Please explain the reasons for your response.)

No comments

General

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

No further comment

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?

No further comment

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