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SPRINKLERS – POLICY LINE

Summary

1. This submission seeks your views to agree a clear and robust CLG policy line on sprinkler suppression systems for life safety and property protection for Ministers and officials to maintain with the sprinkler lobby. The key message is that we have no plans to increase the burden of regulation and the fire safety lobby must move away from the view that the only way to solve problems is through regulation.
2. Over the past 10-years or so there has been a strong lobby from the fire and rescue service and fire protection and insurance industries for the Government to regulate for sprinklers under the Building Regulations. The lobby is also calling upon Government to require sprinklers in all existing social housing. Sprinklers can be an effective way of controlling fires, and protecting lives and property, but they are expensive. The most recent review of the Building Regulations in 2006/2007 concluded that it would not be cost effective to provide sprinklers in new homes, but that it would be reasonable to provide them in blocks of flats over 30m in height, certain types of care homes, and large warehouses. Further recent research in 2009 into the cost effectiveness of sprinklers in new homes in the Thames Gateway has also found that sprinklers would not be cost effective in new dwellings.

Timing

3. Urgent. You are due to address the Fire 2010 Conference at Harrogate on 29/30 June; this will provide a good platform for you to give a firm message to the fire world on this matter.

Recommendation

4. That you:
 - agree the following policy lines for residential sprinklers at Annex A; and
 - agree that you deliver a strong and clear message to fire partners at the Fire 2010 Conference at Harrogate on sprinkler policy and the Government's position.

Background

5. There is a vociferous sprinkler/insurance industry and fire and rescue service (CFOA/FBU) led lobby that promotes the wider use of sprinklers in all building types. The lobby is currently advising Lord Harrison in his PMB which calls for the Building Regulations to be urgently reviewed to require sprinklers in a range of buildings.

6. The principle aim of the lobby is to call for the building regulations to be amended for:

- sprinklers for life safety to be required in all new properties;
- sprinklers for life safety to be installed in higher risk dwellings ie HMOs, private rented sector, local authority stock;
- sprinklers to be installed for property protection in, schools, commercial premises and non-domestic buildings.

7. The Government's primary interest is life safety, including firefighter safety. This is reflected in both the Building Regulations and in the Regulatory Reform (Fire Safety) Order 2005 '(the FSO)'. The FSO requires those with responsibility for the building (usually the employer, owner or occupier) to carry out a fire risk assessment based on the particular circumstances and use of the premises. Under the Order, the responsible person must put in place whatever fire protection measures are adequate and appropriate to mitigate the risk to life loss in a fire. The FSO is not prescriptive about the measures to be put in place providing these reduce the risk to as low as reasonably practical

8. The most recent review of the fire safety aspects of the Building Regulations in 2007 found that while sprinklers would appear to be effective in reducing casualties, they would not appear to be cost effective from a life safety perspective in most types of buildings, only those housing the most vulnerable. Any new measures that we introduce through the Building Regulations must be proportionate, evidence based and justified in terms of the lives that they save and the injuries they can prevent.

Consideration

9. We consider that we need now to manage down fire partner expectations on the issue of sprinklers, and, in particular, the sprinkler lobby's narrow view that regulation is the only way to bring about the wider use and installation of sprinklers. We have no evidence on which to build a case for further regulation on the grounds of life safety and the cost implications for businesses and others, including public authorities, would be disproportionate. We believe that the best way forward, at present, in terms of promoting sprinklers to secure better fire safety outcomes is through non-regulatory routes. We are currently conducting research which aims to provide evidence which can be used to facilitate the increased use of sprinklers without regulation in a range of premises where their installation can be justified on the grounds of cost versus effective risk management. We expect to publish this research by the Autumn.

10. A major barrier to the wider use of sprinklers in the domestic market has been that they are expensive. Nick Ross, the former BBC journalist, has therefore championed the concept of lower-cost sprinklers on behalf of the sprinkler lobby. CLG has facilitated the lower-cost sprinkler project, with assistance from the Fire Protection Association, and have developed a design guide for the system. We are piloting a low-cost system in a number of FRSs areas. The pilot FRSs are funding the pilots, CLG will evaluate the process.

11. We recommend that you give a clear message to the lobby and other partners in your speech to the Fire 2010 Conference at Harrogate on 29/30 June that we have no

plans to increase the burden of regulation and that they must move away from the view that the only way to solve problems is through regulation.

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SPRINKLERS – POLICY LINES

- Wide scale installation of sprinkler systems for new build and existing privately owned dwellings should be driven by market forces.
- The provision of sprinklers was considered at length when Part B of the Building Regulations (Fire safety) was reviewed in 2006/2007. The review, which included public consultation, concluded that it would **not** be cost effective to provide sprinklers in all new homes but that it would be reasonable to provide them in blocks of flats over 30m in height where the risks were shown to be greater and a change to this effect was made to the guidance supporting the regulations in 2006.
- Further recent research into the cost effectiveness of sprinklers in new homes in the Thames Gateway has also found that sprinklers would not be cost effective in new dwellings.
- We have no plans to increase the burden of regulation. Instead we have been clear that we must move away from the view that the only way to solve problems is to regulate.
- If you think that more fire protection would be good for UK businesses then you should be making your case to the business community, not to the Government. Understanding commercial risk is what business does and it is not the place for Government to tell people how to run their businesses.
- Believe the way forward is for the FRS and other partners to consider opportunities to encourage - through non regulatory routes - the greater use and installation of sprinklers, where appropriate.
- Believe this a more appropriate approach to delivering the life safety and property protection benefits that we recognise sprinklers can offer.