# Proposed Social Housing (Automatic Fire Suppression Systems) (Scotland) Bill

**1. Which of the following best expresses your view of requiring fire suppression systems (ie fire sprinklers) to be fitted in new build social housing?**\*

* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Unsure

Comments

The evidence is clear that fire suppression systems save lives in the event of a fire and this, coupled with a reduction in the damage caused to properties in the event of a fire, means we are fully supportive of this proposal.

**2. Which of the following best expresses your view of requiring fire sprinklers to be retro-fitted into housing owned by social landlords which is located in high-rise buildings built prior to 2005?**\*

* Fully supportive
* Partially supportive
* Neutral (neither support nor oppose)
* Partially opposed
* Fully opposed
* Unsure

Comments

Whilst we appreciate some of the cost implications for social landlords and the likely mixed ownership of housing within these high-rise buildings meaning not all flats will have the systems, we are fully supportive of the retro-fitting of automatic fire suppression systems. The evidence is clear that this housing type and the areas in which they tend to be built would benefit from automatic fire suppression systems. This equity of provision (in line with the fitting of systems in new social housing) is important and could save lives.

We query whether the fitting and retro-fitting should be limited to high rise buildings and recommend the Member or committee explore fitting them to high-risk domestic dwellings owned by social landlords too which may not be high-rise buildings.

Alternatively, if the cost of retro-fitting to high rise buildings prior to 2005 is prohibitive and there is evidence that the money could be better spent on targeting other building types, tenancy types or known ‘at risk or vulnerable’ residents, consideration should be given to the latter rather than a blanket approach to one type of building.

**3. 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?**

* Yes
* No
* Unsure

Comments

The commitment from three of the Local Authorities highlighted in the consultation paper shows that legislation is not the only route to achieve the aims of this proposal. Exploring whether social landlords are willing to commit to the proposals voluntarily i.e. not using legislation would be a useful exercise, however legislation may be the only way of securing this important step in fire safety in Scotland.

### 4. 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:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Significant increase in cost | Some increase in cost | Broadly cost neutral | Some reduction in cost | Significant reduction in cost | Unsure |
| Government & public sector |  |  |  | X |  |  |
| Businesses |  |  |  |  |  | X |
| Individuals |  | X |  |  |  |  |

Please explain the reasons for your responses.

Without knowing how many fires there are in new-build social housing vs the cost of fitting the systems it is difficult to answer this question. The cost-benefits should not be taken in isolation or used as a primary driver for whether this should go ahead. We feel that the primary driver for this proposal is about the lives that could be saved. Any cost savings in the long-term to the public sector is a bonus, and equally any increases in cost for businesses is incidental (the only caveat to this is if significant rent rises occur).

 We would anticipate there being some reduction in cost to the public sector, particularly by way of the greatly reduced cost of responding to and managing a fire in these buildings if one occurred. For the case of large buildings this could result in a significant reduction in cost.

We are unsure what cost implications there would be for businesses as it isn't clear what businesses this question is referring to. If it is asking about the impact on social landlords and construction companies we anticipate there would be an initial cost increase however over time, and particularly if there was to be a fire, we would anticipate this to be cost-neutral or some reduction in cost (for reduced damage/repairs, insurance premiums etc).

We anticipate that there could be an increase in cost to individuals as social landlords and/or construction companies could pass the cost of installing automatic fire suppression systems onto tenants. Some thought would have to go into how this was to be prevented as the rented sector is already unaffordable for some people and this could exclude even more. It could reduce home insurance premiums for individuals, however which would be positive.

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

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Significant increase in cost | Some increase in cost | Broadly cost neutral | Some reduction in cost | Significant reduction in cost | Unsure |
| Government & public sector |  |  |  |  | X |  |
| Businesses |  | X |  |  |  |  |
| Individuals |  | X |  |  |  |  |

Again, cost should not be a primary driver for delaying the retro-fitting of automatic fire suppression systems and instead should be an incidental consideration to the impact it would have on individual and community safety in the event of a fire. We would welcome this proposal in conjunction with other prevention measures such as home safety visits, interventions to change high-risk behaviours which result in fires etc.

In the event of a fire we would anticipate there being a significant reduction in cost to the public sector to respond to the fire if automatic fire suppression systems were fitted to these buildings.

As the cost calculations show in the proposal it is more expensive to retro-fit these systems so we would anticipate some increase in cost for businesses. Over the long term this could become broadly cost neutral however if insurance premiums are decreased, and there is a decrease in the cost of repair should there be a fire in the property.

There may be a cost reduction to individuals as home insurance / contents insurance premiums could be reduced. We would hope there would not be a cost increase on individuals however landlords may pass on the cost of retro-fitting these systems to tenants through rent increases and a way of circumventing this would have to be considered.

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

* Yes
* No
* Unsure

Comment

Fitting the systems to properties that are classed as high risk or house people with high risk behaviours could be a way of reducing the cost, however we believe the driver should be the lives that could be saved, not the savings that could be made or costs incurred in achieving the aim.

**7. 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?**

* Positive
* Slightly positive
* Neutral (neither positive nor negative)
* Slightly negative
* Negative
* Unsure

Comment

We are not in a position to comment on this authoritatively, however there could be a slight positive impact on those who would find it difficult to evacuate from a fire e.g. people with mobility issues either through age or disability or young children who are unable to evacuate themselves without assistance.

Thought not strictly an equality issue, there could be a positive impact on narrowing the inequality gap given that many dwelling fires and injuries occur in areas which are more deprived and affect people from these areas.

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

* Yes
* No
* Unsure

Comment

There may be some environmental considerations as highlighted in the consultation paper relating to water sources but we consider that the proposed Bill can be delivered sustainably, with only positive social impacts and proportionate economic and environmental impacts.

### 10. 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. We welcome the proposal and will watch with interest the outcome from the current Building regulation discussions in the wake of Grenfell Tower and this proposal. We are particularly pleased to see the inclusion of retro-fitting within the proposal. Our only recommendations for additional consideration are:

- The potential for landlords or construction companies to pass the cost of fitting and retro-fitting onto tenants and the impact this would have on the tenants and the affordability of this accommodation.

- Consideration of fitting and retro-fitting these systems to other known high-risk buildings.

- Consideration of expanding the retro-fitting to more property types than just pre-2005 high rises or instead of pre-2005 high rises depending on what the evidence says about fires in pre-2005 high rises.

### 11. Do you have any other comments or suggestions in relation to a requirement to retro-fit sprinklers into housing owned by social landlords which is located in high-rise buildings built prior to 2005?

No. We welcome the proposal and will watch with interest the outcome from the current Building regulation discussions in the wake of Grenfell Tower and this proposal. We are particularly pleased to see the inclusion of retro-fitting within the proposal. Our only recommendations for additional consideration are:

- The potential for landlords or construction companies to pass the cost of fitting and retro-fitting onto tenants and the impact this would have on the tenants and the affordability of this accommodation.

- Consideration of fitting and retro-fitting these systems to other known high-risk buildings.

- Consideration of expanding the retro-fitting to more property types than just high rises and more than just pre-2005 depending on what the evidence says about risk, probability and harm.

Submitted by SCSN on 20.03.2018.