Number: **WG19038**

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Public Responses to Consultation

Implementing the Domestic Fire Safety (Wales) Measure 2011

July 2013

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WG19038

Implementing the Domestic Fire Safety (Wales) Measure 2011

Consultation – summary of responses

Part 1 of 3

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056-17935 - Henstaff Construction
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068-17935 - Shropshire Fire and Rescue Service
069-17935 - Ann Jones AM
070-17935 - Cheshire Fire and Rescue Service (Mandy Eeles)
071-17935 - Fire Sector Federation
072-17935 - All-Parliamentary Fire Safety and Rescue Group
073-17935 - National Fire Sprinkler Network

001-17935 - Green Hill Construction

Domestic Smoke detectors in all rooms,including loft space. fire extinguishers in a break glass style lockable cabinet up stairs on a landing, and downstairs in a hallway, break glass to get at fire extinguishers would set of an alarm to deter from misuse! Or even alert fire brigade that its been accessed.

Thanks for your time

John Morgan

M&E manager

Green hill construction ltd

002-17935 - Building & Engineering Services Association

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Bob Towse

Organisation (if applicable): B&ES

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes X☐
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes X☐
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X☐
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X☐
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No X☐
Comments: We do not see the point of introducing this requirement if there is to be no commitment to have the system maintained. Al services need to be maintained.
Having a boiler installed and not having it serviced will lead to that equipment becoming unsafe.
It would only be a matter of time before a house burns down and the system does not operate because the fire suppression system fails to operate.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X☐
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[1] remain relevant given the proposals covered by the new legislation?

Yes X☐
No ☐
Comments:

[1] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes X☐
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes X☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes X☐
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes X☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

003-17935 - Blaenau Gwent Council Building Control

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Sean Pagett

Organisation (if applicable): Blaenau Gwent Council

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No X
Comments: You must be careful. We have already had large house builders say that they may not continuing building in Wales because of the additional cost of installing theses systems.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No X
Comments: Yes some of the residents listed would benefit from this type of system. In the majority of cases a much cheaper early warning advanced fire alarm system makes far greater sense. Generally this is in place anyway. Older buildings which are being converted are less likely to be converted with costly sprinkler systems having to be installed.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No X
Comments: What is the point of having a system if it is not checked? But this goes back to my earlier point, your not looking at the whole issue in a sensible manner or approach.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☐
No X
Comments: You can't get people to get the boilers serviced so an householders guide to encourage maintenance is a waste of money and tax payers money at that.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No X
Comments: This needs to be looked at in greater detail before implementation.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[2] remain relevant given the proposals covered by the new legislation?

[2] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes X
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes X
No ☐
Comments: After additional training

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No X
Comments: Mainly because I don't agree with the principle of the coverage of residence.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No X
Comments: House builder have already voiced their opinion about not building in Wales with the more stringent regulations so I expect your predicted figures will go down.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No X
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: A much simpler approach is needed. Small domestic properties do not need sprinkler systems full stop. An advanced fire alarm and detection system is far more cost effective and will save lives.
Conversions or refurbishment projects which will be difficult to install these system may remain empty properties with this possibly onerous legislation. Developers will be put off.

004-17935 - Residential Sprinkler Protection

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: John Newman

Organisation (if applicable): Residential Sprinkler Protection

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: This should guarantee a reliable system installation

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Mist systems would eventually have a role in certain situations

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Cannot see it being practical, particularly with individual householders

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: Would reduce risk of conflicting regs

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[3] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

[3] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☐
No ☒
Comments: The NPT college proposed training scheme needs to be developed to a nationally recognised qualification.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Third party UKAS accreditation needs to be encouraged, perhaps not in regs, but by regulatory bodies

005-17935 - Joseph Cartwright

I was frankly amazed to hear that the Welsh Assembly Government was planning to make it compulsory to install sprinklers in new or refurbished homes.

I understand that deaths from fires has gradually been reducing in Wales over a number of years. I imagine this is due to a gradual switch from open fires to central heating as well as reductions in rates of smoking. I believe that the number of deaths might be approaching single figures per annum.
I have worked in the construction industry for many years and have good experience in installing and maintaining sprinklers. They are expensive systems and anecdotally I believe that this may be because the specialist companies involved are operating a cartel. I've no evidence of this only that you don't appear to get much for your money.
How is the legislation going to ensure that the systems are maintained? Possibly an annual inspection? This will probably be an added expense for households.
I imagine there has been some research into the causes of domestic fires in Wales. How many of these are caused by intoxicated people falling asleep whilst smoking or heating up a chip pan? Is it believed that this same group of people will be responsible enough to maintain their systems whether enforced or not?
Finally I believe that if Wales enacts this legislation it may well become a laughing stock in the rest of the United Kingdom and internationally.

Joe Cartwright Bsc. MRICS, PVM, TVM

007-17935 - Nick Ross

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Nick Ross

Organisation (if applicable):

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: *BUT do not necessarily rule out ultra-low cost systems which are on the horizon and may almost as effective without reaching BS accreditation.*

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: *See comment above.*

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: *It would be extremely difficult and costly to enforce. It is right to keep costs down – at least as an introductory measure.*

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: *Self-evidently useful and a good use of government money.*

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: *6 months' notice is adequate given all the advance publicity.*

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[4] remain relevant given the proposals covered by the new legislation?

Yes ☐
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐

[4] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments: *The proposals rightly point out that this must grow as required with experience.*

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: *To answer this properly requires considerable expertise but on the face of it the cost-benefit analysis looks sound.*

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

008-17935 – Ashfire

Dear Sirs
Further to presentations to C Blick and M Isherwood I have bee requested to post a comment for debate.

Sprinkler Performance

The Sprinkler performance is reliant on a water supply which has to be pressurised by source or Mechanical.

Failure in either results in No System

The Sprinklers a temperature operated and have no means to deal with a Cold Smoke Fire anfd the carbonisation (Toxins) present.

This incapacity affords no protection to the inhabitants whatsover.

There are alternatives which are more Effective and afford extendec tenability and Escape times.

We would be pleased to return and represent these alternatives.

I look Forward to your early reply.
Best Regards

P.Evans

Additional

Dear Sirs

Having Attended the Consultation meeting in Cardiff 7th (Fire Sprinkler installation Legislation).

Could you consider that an investment by the Assembley in innovation (New Products Etc Etc) would prove to be a very prudent measure and ensure employment for the long term rather than a Shorter "Construction Phase Period"

Best Regards

P.Evans
on May 08, 2013, **Constructing Excellence in Wales** wrote:

Welsh Government Announcement

£76.5m Funding Package

A £76.5m funding package for housing, schools, flood protection and transport will support around 1,400 jobs and boost economic growth, Finance Minister Jane Hutt said yesterday.

Since the publication of the Wales Infrastructure Investment Plan for Growth and Jobs in May 2012, the Welsh Government has delivered additional investment of around £1.1 billion in infrastructure projects across Wales by maximising the use of reduced capital budgets and by generating investment of around £750m through innovative finance.

The additional £75m allocation announced by Jane Hutt includes:
• A £30m package of investment to increase housing supply, including:

• An additional £20m for the Social Housing Grant specifically to target investment in providing housing for individuals and families that may be adversely affected as a result of the UK Government's reductions in Housing Benefit; and
• £10m to expand the pilot of the Houses into Homes initiative to bring empty homes in Wales back into use.
• A £25m package of investment in education to further accelerate the 21st Century Schools Programme.
• £11.5 million for a railway and station in Ebbw Vale town centre, as an initial element of a wider programme to create a more integrated transport network in South East Wales and support the City Region strategy. This investment will be a further boost to the regeneration of the local area.
• £10m additional investment in the Flood and Coastal Risk Management Programme, to protect homes, businesses and communities from the risk of flooding.

Jane Hutt said:
"The £76.5m of additional capital investment I am announcing today supports the priorities set out in the Wales Infrastructure Investment Plan for Growth and Jobs and ensures every Welsh pound is used to boost jobs and growth."

"The main benefits of investment are gained over the long term. But in present circumstances, the jobs created in constructing new infrastructure are vitally important, and this latest package is expected to support around 1,400 jobs during the construction phase."

"This significant package of investment clearly demonstrates our commitment to stimulating economic growth, creating jobs, mitigating the impact of the UK Government's Welfare Reforms and reducing poverty in Wales."

009-17935 - David Nattress

I have two comments:

Your response form is in Ability Word format and I cannot access it without purchasing a £40 software program.

Have you considered what will happen if the sprinkler system in a house or flat is activated by, for instance, a chip pan fire in the kitchen? The sprinklers in the unit will come on and do untold damage to the soft furnishings, electrical apparatus (particularly computers), clothing, etc. Instead of a fire damaged kitchen you will have a ruined accommodation unit. In a block of flats you could have more than one unit ruined. If I were concerned about issuing insurance for such a premises the natural option would be to say that the contents section of a domestic building insurance would not be operable in a unit so equiped or would attract an enhanced premium such that the unit would be un-insurable.

Public buildings where you protect many people, yes. Commercial premises where you are protecting both people and goods, yes. Domestic premises - the whole idea is daft.

David Nattress

010-17935 - Wiltshire Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: John Popowicz

Organisation (if applicable):Wiltshire Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes x
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes x
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes x☐
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes x☐
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes x☐
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes x☐
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes x☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[5] remain relevant given the proposals covered by the new legislation?

Yes x☐
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes x☐
No ☐

[5] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes x☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes x☐
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes x☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

011-17935 - Lincolnshire Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Keiron davey

Organisation (if applicable):Lincolnshire Fire and rescue

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: I believe that once the system is currently in place consideration should be given to the maintenance of such systems, in particular after use activation. Fire protection products and related services should be fit for their purpose and properly installed and maintained in accordance with the manufacturer's instructions or the relevant British Standard.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[6] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

[6] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☒
Comments: I believe that there should be a formal qualification for the installation and designing of such systems. Third-party certification schemes for fire protection products and related services are an effective means of providing the fullest possible assurances, offering a level of quality, reliability and safety that non-certificated products may lack. This does not mean goods and services that are not third-party approved are less reliable, but there is no obvious way in which this can be demonstrated. Third-party quality assurance can offer comfort both as a means of satisfying you that goods and services you have purchased are fit for purpose, and as a means of demonstrating that you have complied with the law

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments: it would be very good to see the list of premises reviewed and if appropriate additional premises added following fire data or increased incidents within other areas.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

012-17935 - AS Fitzgerald

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: A S Fitzgerald

Organisation (if applicable): n/a

email / telephone number:

Your address:

I am writing with my comments on the above proposals but I am not answering the specific questions on which you are seeking views as per your consultation paper.

The comments I am making are probably too late to be taken into consideration but I make them in any event as I feel that what is being proposed has not been properly thought through with a major omission from the representation on your Working Group. I will come to this point shortly.

The measures are being introduced in response to the average death rate of 10 per year from domestic fires. Of course, 10 deaths is 10 too many but the number is insignificant compared to other categories of deaths in Wales. From reports in our local paper it would seem that there are almost 10 deaths per month in the former West Glamorgan area alone from motor vehicle accidents. To make such far reaching and costly measures for sprinkler systems in domestic properties suggests that the time, effort and money could be better expended in drawing up proposals to tackle other causes of deaths with far higher annual death rates.

That said, I will now turn to the membership of the Working Group. I was quite frankly amazed that there was no representation by the Insurance industry.

I make this point because we all know that some of the currently installed smoke detection systems are extremely sensitive and will sound the alarm if, for example, a toaster is left on and the bread starts to burn. That is quite a common occurrence - no fire but sufficient smoke to trigger the alarm.

If the smoke detector in a sprinkler system is similarly sensitive then the sprinkler would start without there being any real fire. To quote your figures, if the water supply duration is 10 minutes and the flow rate is 60 litres per minute then 600 litres of water would be released.

600 litres of water would cause damage to belongings, fitments and furnishings. My concern is the damage and consequent repair/reinstatement costs in the circumstances where the sprinkler system is activated but there was no fire. And please, don't tell me that this could not happen.

Soaked carpets and soft furnishings would need to be replaced, wood and laminate floors would need to be replaced and furniture (in particular kitchen units) made with a chipboard core would not survive a drenching and again will need to be replaced.

Other domestic belongings, eg books, electrical equipment (TC, video recorders, computers, kitchen appliances) would also need to be replaced so the question that needs to be answered is what is the likely impact to be on the householder in respect of his home insurance.

Before proceeding any further with this proposal it would be sensible to talk to the Insurance industry to establish:

- the likely increase in costs for house and contents insurance that will arise due to the implementation of this measure;

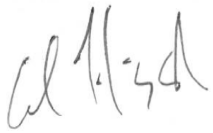
- how any policy excess will be handled where it is the Welsh Government and not the householder who has demanded the installation of a sprinkler system;

- what would happen if an over sensitive detector caused a second or subsequent activation of the sprinkler system - would the insurance company refuse to pay; would the householder have any claim against the Welsh Government (I know the answer to that!). In the extreme, would an insurance company refuse to accept the risk where more than one claim had already been made for sprinkler water damage;

- what would happen to all those householders who do not have house or contents insurance and lose all their belongings because an outside body (ie the Welsh Government) has decreed that they had to have a sprinkler system installed in their property.

I can't believe that this whole subject area has not been evaluated but I am not confident that it has for the simple reason that the insurance industry was not represented on the Working Group and there was no mention of it in the Consultation Paper. I have also examined the Cost Benefit Analysis Report produced in April last year and there is simply nothing covering either the insurance aspect or the value of any likely water damage caused by sprinklers. The only figure I can find is £8,000 for domestic damage cause by a fire with a figure appropriately four times that for a care home. Why hasn't anyone appeared to have considered this?

If the insurance implications haven't been taken on board I can see the tabloid newspapers having a field day when water damage caused by the accidental triggering of water sprinklers and the consequential insurance problems start arising. We don't want the Welsh Government becoming a laughing stock through implementing something that proves to be a disaster in practice but it looks as if we're heading in that direction.



A S Fitzgerald BSc MSc

014-17935 - East Sussex Fire and Rescue Service (Richard Fowler)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Richard Fowler

Organisation (if applicable): East Sussex Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: I assume that the wording of paragraph 28 is intended to include all of the premises types listed, and all common parts in all of the premises types listed. If not, it should be amended so that it does.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: I believe that regulation of maintenance of sprinkler systems would be very difficult to enforce and I therefore support the proposal not to regulate maintenance at this time. However, I think that consideration could be given to regulating maintenance in rented accommodation (in much the same way as gas appliance certification is regulated). A requirement to provide a current certificate of maintenance for a sprinkler system could also be added to other existing requirements that apply when a dwelling is being sold.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[7] remain relevant given the proposals covered by the new legislation?

[7] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:
Some omissions from ADB appear to be recommended in the draft proposal that have no direct relevance to the introduction of sprinklers. It is unclear why the Welsh Government would want to omit these paragraphs (e.g. reference to third party accreditation schemes).
Paragraph 2.5 is clearly written to support the development and introduction of new and innovative sprinkler systems in the future. However, if it remains worded as per the draft, this will be open to abuse and may encourage the use of non-code compliant systems. This paragraph also states that the 20m height limit in BS 9251 may be ignored. The Welsh Government has not provided any evidence in the consultation document provided to show why it believes this to be acceptable.
In paragraph 2.20 of the proposed new ADB document, it is unclear whether the sprinklers required when a room is added are required just in the new room(s) or throughout the dwelling. This should be clarified. The reference to paragraph 0.21 does not appear to make sense.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

015-17935 - Nationwide Fire Sprinklers

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Keith Rhodes

Organisation (if applicable): Nationwide Fire Sprinklers Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: Are residential caravan occupants less worthy of being saved from fire though?

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: And should consider advice given in industry technical guidance documents

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: If 25% of systems fail as they have been disabled then the bill is only going to be at best 75% effective

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Only some 15% of private UK home owners presently contract for ongoing maintenance

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: But not soon enough!

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[8] remain relevant given the proposals covered by the new legislation?

Yes ☒

[8] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

016-17935 - Residential Sprinkler Protection

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Anthony Newman

Organisation (if applicable): Residential Sprinkler Protection

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: Important for reliable installations

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[9] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☒

[9] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments: There is a need for a recognised qualification

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

017-17935 - Isle of Man Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Deputy Chief Fire Officer John Murtagh

Organisation (if applicable): Isle of Man Fire and Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

No The omission of in particular car parks under flats is a mistake. There was a fatality in flats in Bristol in flats covered by sprinklers where a fire in the car park spread to the flat involved and someone was killed. Why have hotels been omitted yet boarding houses included, fire does not discriminate why have you? Additionally what is the rationale behind short and long term hostels being separated. Fire does not discriminate and people staying in unfamiliar surroundings must have the protection they deserve, sprinkler protection. I feel it will be a hard task informing the family of a deceased victim that if they had been in long term hostel accommodation they would have been protected with sprinklers, If someone could explain the reasons I would be most grateful.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes So why have you stepped outside a recognised standard by not requiring coverage in common areas, I feel this to be a very big mistake.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[10] remain relevant given the proposals covered by the new legislation?

Yes

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

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[10] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes on page 31 point 145 (1) refers to ADL should this be ADB?

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: You have omitted in car parks and shops under flats, this is a mistake as mentioned above for car parks. Shops also should be covered, to rely on separation and management could be flawed and for the sake of additional coverage should be considered to be included.

018-17935 - Fire Brigades Union UK

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: David Sibert. Fire safety Advisor

Organisation (if applicable): Fire Brigades' Union (UK)

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes Yes
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes Yes
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes Yes
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes Yes
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes Yes
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes Yes
No ☐
Comments: A guide should be backed up with occasional public information TV campaigns and radio messages. Also incorporated into fire safety week campaigning and general fire and rescue service community fire safety activity

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes Yes
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[11] remain relevant given the proposals covered by the new legislation?

Yes Yes
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

[11] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☐
No ☐
Comments: I do not understand the existing sources of training well enough to answer either yes or no.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes Yes
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes Yes
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

020-17935 - North Wales Fire and Rescue Service (Conwy)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: DAVID GREENE

Organisation (if applicable):NORTH WALES FIRE AND RESCUE SERVICE

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes X
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes X
No ☐
Comments: FAR MORE WIDE-REACHING RANGE OF PROPERTIES THAN I HAD ENVISAGED AS BEING INCLUDED.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X
No ☐
Comments: DEFINITELY, THE CURRENT RESEARCH BEING CARRIED OUT WITH REGARDS TO FIRE SUPPRESSION SYSTEMS COULD LEAD TO A WHOLE HOST OF VARIATIONS TO THE CURRENT SPRINKLER SYSTEMS WE KNOW OF. THEREFORE, INCLUDING THIS REFERENCE TO OTHER SYSTEMS COULD WELL NEGATE THE NEED TO AMEND THE GUIDANCE AT A FUTURE DATE.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes X
No ☐
Comments: MIXED FEELINGS ON THIS ONE, THERE HAS TO BE SOME KIND OF REGULATION IN PLACE. I THINK THE INSURANCE INDUSTRY COULD BE THE BEST WAY FORWARD IF THEY WERE TO MAKE MAINTENANCE A CONDITION OF CONTINUED COVER.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[12] remain relevant given the proposals covered by the new legislation?

Yes X

[12] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No X
Comments: THERE WILL NEED TO BE A LARGE EXPANSION OF TRAINING FACILITIES TO COPE WITH DEMAND.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes X
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☐
Comments: NEUTRAL, I THINK IT IS ALMOST IMPOSSIBLE TO PREDICT

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes X
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

021-17935 - North Wales Fire and Rescue Service (Wrexham)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Paul Whybro

Organisation (if applicable):North Wales Fire and Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☐
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes
☐
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes
☐
No ☐
Comments: But maintenance may be required in premises under the Fire Safety Order

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes
☐
No ☐
Comments: I would be concerned that costs to householders should be affordable

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes
☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[13] remain relevant given the proposals covered by the new legislation?

[13] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes
☐
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes
☐
No ☐
Comments: But more will be required

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes
☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes
☐
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes
☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

022-17935 - Niblett Architecture

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Nigel Patterson

Organisation (if applicable):

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No ☐X
Comments: The proposed approach will affect only new homes and therefore will have little effect on the number of deaths and injuries from fires. There are no statistics which show how many people were killed or injured where there was a working detection system.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No X☐
Comments; The list should relate to the scale of properties. There are no statistics which show a direct correlation between lives saved and sprinkler systems

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☐
No X☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X☐
No ☐
Comments: Other systems may be more effective in saving life

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No X☐
Comments: A badly maintained system may result in more false alarms creating more waste and insurance damage

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X☐
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No X☐
Comments: There have been too many recent changes and we need to allow the construction industry to absorb these otherwise there will be no housing in Wales as we won't know what or how to build

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[14] remain relevant given the proposals covered by the new legislation?

Yes ☐
No X☐

[14] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments: The standards should be adapted for domestic small scale systems

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No X☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No X☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No X☐
Comments: The cost benefit mixes the statistics between the UK and Wales and therefore the effect of the introduction of the systems appear to save more lives per year than have been lost in the last 10 years

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No X☐
Comments: The regulatory impact does not take into consideration all of the other changes that are taking place with BR and planning.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: I believe that there should be more effort put into detection and push this to 100% of all new or extended properties, HMOs and letting properties. The inclusion of domestic sprinkler systems will do little to save lives.

023-17935 - North Wales Fire and Rescue Service (Gwynedd and Môn)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Terry Williams

Organisation (if applicable): North Wales Fire and Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes √
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes √
No ☐
Comments: Boarding schools appear to have been overlooked.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes √
No ☐
Comments: There may be other standards which achieve the minimum requirements in order to comply and may allow installers a greater degree of flexibility.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes √
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes √
No ☐
Comments: Premises which are covered under the RRO will have some degree of regulation with regard to maintenance.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes √
No ☐
Comments: There is a need to emphasise to owners the benefits of having a system adequately maintained will greatly assist in ensuring the availability in an emergency.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes √
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[15] remain relevant given the proposals covered by the new legislation?

Yes √

[15] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes √
No ☐
Comments: There will probably be a need to expand the available training sources to cope with demand initially.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes √
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes √
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes √
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

024-17935 - Mid and West Wales Fire Service (Richard Davies)

Sir/Madam

The water pressures within the local water main, may be a significant issue in operation of sprinkler systems, due to the reduction of pressures throughout the geographical area of Mid and West Wales, by water undertakings. Perchance an undertaking by these groups to have a minimum prescribed pressure over a set duration may alleviate the issue.

Many thanks

Richard Davies
Station Manager Fire Safety Inspector
Wefan / Website: http://www.mawwfire.gov.uk

026-17935 - Norfolk Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: RICHARD HERRELL

Organisation (if applicable): NORFOLK FIRE & RESCUE SERVICE

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: **For the avoidance of doubt – sheltered housing should also be considered.**

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[16] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒

[16] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

027-17935 - Merseyside Fire and Rescue Service (Organisation)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Merseyside Fire & Rescue Service

Organisation: Merseyside Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: *This fire service considers that the Measure should be applied to schools used for accommodation and other residential properties where they house vulnerable groups, in order to prevent ambiguity around supported living environments.*

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☐
No ☒
Comments: see Q4

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: *There is little point in providing life safety systems if they are not adequately maintained but we understand the pragmatic approach in not making it mandatory for homeowners but this does sit outside of the British Standards for such systems. Any commercially operated residential premises should be mandated to implement maintenance*.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[17] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐

[17] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☒
Comments: *Life safety systems must be designed, commissioned, installed and maintained by competent and experienced practitioners in order that they can be appropriately certificated. There is a potential for domestic systems to not receive adequate maintenance, it is suggested that this may be alleviated should Insurers make a requirement for a maintenance certificate to be produced as a trade-off for insurance discounts.*

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: *The value of life is not adequately quantified to enable sufficient validation of the CBA, if this value were reflective of data from other industrialised countries then the case could be deemed beneficial in terms of single private dwellings.*

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: *This Measure must not be allowed to fail on the basis of profit margins for developers, if we are to succeed in preventing fire deaths and injuries there will be an initial expense, it is considered this will be more than recompensed by the effect on the quality of life for individuals in terms of safety from fire in their own homes, especially those vulnerable groups who seek independent living. It will also have significant benefits in terms of cost saving for medical treatment, insurance costs, environmental concerns and sustainability of our infrastructure.*

030-17935 - West Yorkshire Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Nigel Thompson Charlston QFSM, MCGI, GIFireE.
Head of Fire Engineering, Planning & Licensing

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes

Comments: These proposals are significant and important in taking forward fire safety. Wales will be at the forefront in reducing fire risk and cutting the number of avoidable deaths and injuries caused by fires in residential premises.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes

Comments: We agree with the proposed list. It will be beneficial for the categories of residence included in the Measure to align with the purpose groups in the Building Regulations.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes

Comments: We agree with the Welsh Government that there is a need to base standards and guidance on robustly understood systems. The lack of a British Standard for water mist systems is a serious impediment to prescribing the use of such systems through regulation. It is difficult to demonstrate how the requirements of the regulation are being met if a system does not have a British Standard or other appropriate technical standard.

This should be kept under review.

The installation of sprinkler systems to BS 9251 would be significantly less onerous than a commercial system to BS EN 12845

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes

Comments: New standards are likely to be produced in the future

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes

Comments: We understand the concern that a sprinkler system may not be appropriately maintained, but agree it is difficult to legislate. However, as you state, this is a similar situation to a property where the automatic fire detection system or fire resistant doors have not been adequately maintained.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes

Comments: We believe a guide would be useful. It would be more beneficial to encourage the building insurers to request evidence of sprinkler system maintenance in order to provide insurance.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes

Comments: The existing regulatory framework of building control presents a tried and tested regulatory system that is familiar to builders, Approved Inspectors, fire authorities and local authorities.

We believe a combined approach will implement the Domestic Fire Safety Measure, avoid the risk of additional bureaucracy and duplication, and build on a strong, existing regulatory system that is well understood and effective.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[18] remain relevant given the proposals covered by the new legislation?

Yes

Comments: The NOS sets out the appropriate skills, knowledge and understanding and cover the following activities:

- Plan to commission a mechanical fire protection solution
- Carry out final tests to confirm operation of a mechanical fire protection solution
- Commission installed equipment

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes

Comments: Historically, there have been no recognised training schemes specific, or even particularly relevant, to the design and installation of Fire Sprinkler Systems. The situation is rapidly changing. Skills for Security, support by the British Automatic Fire Sprinkler Association, has already developed National Occupational Standards for Mechanical Fire Protection. Currently there are three UKAS listed schemes for sprinkler installers covering systems installed to BS 9251. We consider it essential that you ensure businesses are fully prepared to respond to any new requirements and for them to effectively compete for new work.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes

[18] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments: The proposed changes are appropriate. It is also important that the proposed regulations to implement the Measure have a very clear relationship with the existing system of building control.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Sprinklers are the most effective way to ensure that fires are suppressed or even extinguished before the fire service can arrive. They save lives and reduce injuries, protect firefighters who attend incidents and reduce the amount of damage to both property and the environment from fire.

As fire service budgets are being cut back significantly, preventative measures such as sprinklers will be more important than ever. We watch the developments in Wales with great interest and we fully support the proposals.

031-17935 - NICEIC

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Paul Collins

Organisation (if applicable): NICEIC

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes x
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes x
No ☐
Comments: We agree, however are surprised to see that Hotels including B&B's are excluded from the requirements when some of these do not have a 24/7 manned presence.

Dwellings and Hotels are required to have a fire detection system, therefore the requirement for a fire suppression system should mirror the fire detection system requirements.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X
No ☐

Comments: It is essential to use existing industry standards to ensure a consistent approach is adopted across all installations.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No X
Comments: A failure to legislate will lead to non-compliance with the requirements as systems will not be maintained, especially during hard economic times if it is left as voluntary. A legal driver is needed otherwise there is no point of installing a fire suppression system.

If a fire suppression system maintenance record is provided annually to local authority this could keep Council Tax payments at current levels, however if this cannot be provided then an enhanced payment would be required to ensure there is an increased Fire Service resource available to cover the additional risks.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[19] remain relevant given the proposals covered by the new legislation?

Yes X
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No X
Comments: We suggest that related trades training centres, such as training centres for plumbing and heating engineers, will have a the capability to offer fire suppression system training

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes X
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes X
No ☐
Comments: Based on the information provided

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No X
Comments: We believe that the RIA is failing to take into account the root cause of a fire. As an example how many deaths could be attributed to fires that have been started due to faulty electrical equipment?

[19] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Where is the evidence that there has been a study deeper into the problems to determine why fires are started and then look for solutions to stop them from happening. Prevention is better than cure.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

No further comment

032-17932 - Matthew Daer

Dear Sir/Madam,

Some insurance companies will not cover damage from sprinklers. This damage would be extensive and could result in a family permanently losing their home when a fire would have been covered by the insurance policy.

I renovate properties and always regardless of whether I have to install interconnected mains smoke/fire alarms. These are good value and offer fantastic protection if they remain in working order. To save lives work with this existing excellent technology.

I work a lot up in the valley areas where water pressure and flow rate might not meet the requirements for a sprinkler system that would then result in a massive extra cost of installing tanks and pumps etc...

So in summary I strongly oppose this proposal and suggest beefing up the smoke/fire alarm requirements.

Best Regards,

Matthew Daer

Please feel free to contact me about this matter.

033-17935 - European Fire Sprinkler Network

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Alan Brinson

Organisation (if applicable): European Fire Sprinkler Network

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes X
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes X
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X
No ☐
Comments: A European standard is under development, with input from BS 9251 and other national standards. The guidance should admit the European standard when it is published.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X
No ☐
Comments: The flexibility should only apply to water mist and should make that clear. No other technology has the potential to be a viable alternative to sprinklers.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes X
No ☐
Comments: In flats there will be a duty of care for the freeholder to maintain the sprinkler system. Likewise for care homes there will be a duty to maintain the system. It is only in private houses that maintenance should not be required by regulation.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X
No ☐
Comments: The guide should also explain the basic features of the sprinkler system and include some simple dos and don'ts, so that the owner knows how to look after the system.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X
No ☐
Comments: We would prefer as soon as reasonably practical. A six month lead-in is more than enough time to prepare because all involved have been well aware for some time that the changes were coming.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[20] remain relevant given the proposals covered by the new legislation?

Yes X
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes X
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes X
No ☐
Comments: There are some editorial formatting issues, such as on pages 18, 21 and 23 of Volume 1.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes X
No ☐
Comments: The benefits are based on the value of a statistical life determined by The Treasury in its Green Book. The Welsh Assembly need not use the same figure. Other western countries use much higher figures. Thus this important input value in the cost benefit calculation is subject to political considerations with the UK applying a lower figure than its peers. A higher value of a statistical life leads to greater benefits in the calculation. The benefits will outweigh the costs for single-family houses if a higher value for a statistical life and a lower maintenance cost are used. If most systems in houses are not maintained, as is the case for domestic boilers, a much lower maintenance cost figure in the cost benefit analysis could be justified.

[20] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes X
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: The European Fire Sprinkler Network welcomes the legislation and regulation. Experience in other countries has shown that all the potential issues raised by those against the requirements can be overcome without difficulty. While most of the experience quoted is from the USA, Norway has required sprinklers in all new flats since July 2010. The experience has been positive, with costs found to be modest.

The proposed changes to Approved Document B Volume 2 do not include a requirement for sprinklers in car parks beneath residential buildings. Testing by BRE and experience of fires has shown that without sprinklers such fires can spread to involve many cars. Fire & Rescue services are then unable to approach the fire to extinguish it, leading to a lengthy burn period which can weaken the structure and put residents in the building above it at risk. This risk is aggravated for fires in stacker car parks, where the fire brigade cannot reach the cars.

Additional

As discussed, the NHBC funded some research by the BRE in 2010 to show that inner rooms are acceptable with sprinklers and enhanced fire detection. I have attached the report. One of the authors was Brian Martin, who now works for CLG in Building Regulations and is responsible for the English version of Approved Document B. In 2011 BS 9991 was published. It includes this incentive for sprinklers. I was a member of the committee which drafted BS 9991. At each meeting a representative of CLG was present and he was content with the inclusion of this incentive. While under the Welsh measure this would not be an incentive since the flats would be sprinklered anyway, without it there would not be a solution to allow open-plan flats in Wales. This is something that flat-owners and flat developers would like to be able to do and which they can do in England. The relevant clause is in your proposed Approved Document B Volume 2, Section 3.5 Inner rooms. As it stands, the text bans inner rooms and thus open-plan flats. I do not know what relationship the Welsh Government has with BSI and whether copyright could

apply but I note that there is a lot of material in BS 9991 which came from Approved Document B. This is the text in BS 9991:

Open-plan flat design

Open-plan flats should not be used for sheltered housing or extra care housing.

Open-plan flats that do not have protected corridors or hallways but that have bedrooms that are inner rooms without having an alternative means of escape, and that are accessed directly from a lounge or similar type accommodation may be permitted as flats and basement flats, provided the open-plan flat is fitted throughout with a sprinkler system designed and installed in accordance with BS EN 12845 or BS 9251 and a fire alarm system in accordance with BS 5839-6, Grade D, LD1.

Open-plan flats should conform to the following:

a) The size of the open-plan flat should not exceed 16 m x 12 m.
b) Open-plan flats should be situated on a single level only.
   NOTE 1 Single level flats exclude flats with galleries.
c) The ceilings within the open-plan flat should have a minimum height of 2.25 m.
d) The kitchen should be enclosed in open-plan flats having an area exceeding 10 m x 8 m. Cooking appliances in open-plan flats having an area smaller than 10 m x 8 m should not be adjacent to the entrance of the flat.
   NOTE 2 An open-plan flat design is not compatible with small, single staircase buildings reliant upon internal protected entrance halls for lobby protection to the staircase enclosure.

Yours sincerely,

Alan Brinson
Executive Director

034-17935 - Staffordshire Fire and Rescue Service (Hanley)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Chris Thompson

Organisation (if applicable): Staffordshire Fire & Rescue Service

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: As the aim is mainly to protect residential type premises, the use of BS 9251 as a guide is appropriate. It also allows the provision of a fire suppression system without the requirement to follow lengthy and confusing design guidance. The watersupply provision is also more manageable that with BS EN 12845. Use of this standard also means that designers and builders will not have to incur excessive costs in either obtaining copies of the

standards or when receiving periodic updates - as is the case with BS EN 12845.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Immediately a standard is made available for water mist systems, this will be used instead of BS 9251and will dilute the effectiveness of the new legislation. The applicatios for water mist are more specific and types of system may be manufacturer specific - along with the components. This could lead to increased costs associated with the system installation and repair and the ability of organisiations to undertake installation and maintenance may be restricted due to approved supplier / installer requirements introduced by the manufacturer. The sprinkler system can deal better with variations in fuel loading and geometry inthe protected compartment (s) than a water mist system and is a tried and tested technology supported with a wealth of data. Even if the flexibility is removed, efforts may still be made to engineer out sprinkler systems and replace them with mist systems which will lead to increased workload for regulatory authorities when determining whether the alternative proposal meets the requirements of the Welsh Building Regulations.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: It would be very difficult, if nigh on impossible, to require a householder to undertake mainteneance on a system wholly contained within a single private dwelling. The provision of a guide is a good way of highlighting the need for maintenance in a waythat would not reduce the credibility of the reasoning behind it being required to be installed. It would then be the householder who had the responsibility to decide whether the system should be maintained - as it is with gas boilers, burglar alarms etc. It may be that insurers incorporate a requirement for the system to be

maintained in order to derive a premium reduction. The guide can easily be incorporated into any management handbook. It will also ensure there is no additional judicial burden - as outlined in the CBA.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[21] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

[21] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Is any clarification required on short stay accommodation to prevent halfway houses being classified as short stay accommodation despite the residents living there for longer than would be expected than in buildings such as youth hostels etc. for which the exemption is intended.

035-17935 - Swansea Council

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Darren Whetton

Organisation (if applicable): Swansea Council

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: Short term hostels? Are these included as long term hostels (none leisure hostels)

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: Why install and not maintain?

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[22] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

[22] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: More providers

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: Better information on house type and age

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Rule 43 from Southampton Fire (Shirley Tower) UPVC trunking fire resistant cable supports in trunking. Will this be added

036-17935 - Fire Service International Ltd

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Andrew Thomas

Organisation (if applicable): Fire Service International Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: If we don't regulate how can we hope to achieve compliance

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[23] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒

[23] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: The cost really shouldn't have a bearing anyway, the moral implication of failure to respond to the safety need of an aging population is of main concern

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

039-17935 - Carillion Specialist Services Ltd

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: David Scott

Organisation (if applicable): Carillion Specialist Services Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[24] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐

[24] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

041-17935 - Carmarthenshire County Council (Michael Kelleher)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Michael Kelleher

Organisation (if applicable): Carmarthenshire County Council

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No ☒
Comments: Having read the consultation document

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: Having read the consultation document

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: Having read the consultation document

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No ☒
Comments: Having read the consultation document

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[25] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

[25] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: On going

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No ☒
Comments: Having read the consultation document

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: Having read the consultation document

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☒
Comments: Having read the consultation document

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

043-17935 - Aico Ltd

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Neil Perdell

Organisation (if applicable): Aico Ltd

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: There does not appear to be any cost benefit in applying the measure to dwellings in purpose group 1(c) so I believe that this group should be exempted

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: It is important that there should be flexibility as acceptable systems may be available, or soon become available, that could provide an effective system. Where no applicable standard for these systems exists 3rd Party testing and verification from a recognised testing body should be an acceptable means of determining their 'fit for purpose'.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Maintenance is an important subject but would be impossible to police effectively if regulated.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: This should be undertaken by the manufacturer/installer of the equipment and should not place additional costs on the taxpayer.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[26] remain relevant given the proposals covered by the new legislation?

[26] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☒
No ☒
Comments: I can only assume that if they were satisfactory previously there is no reason that I can see that would make them less satisfactory now.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☒
Comments: This would be a reasonable assumption

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☒
Comments: With the qualification noted at Question 2.
However, I believe an ideal opportunity to further improve fire safety via the provision of additional fire detectors (to Category LD2) has been lost with the revision solely aimed at the inclusion of suppression systems.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☐
Comments: I don't have an alternative but the current system does not appear to be very robust

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☐
Comments: I don't feel qualified to respond

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

I think it is a reasonable claim that the reduction in deaths from fire has been attributable in no small part to the increased provision of smoke alarms in dwellings and I would comment that as the stated intention of the proposed changes is to make houses in Wales safer from fire, there is an easier and potentially more cost-effective means of achieving this. All that is required is to simply follow Scotland and Northern Ireland's (and Ireland) lead in requiring an upgrade from Category LD3 to an LD2 level of cover. I firmly believe that this change should be implemented whether or not fire suppression equipment is installed.

044-17935 - West Sussex Fire and Rescue Service

I am responding give my full support to this measure. We all know that there is a clear gap in our service from the sound of the smoke detector to the arrival of the fire service. It is in this time that people are most vulnerable and susceptible to the full consequences of a fire.

This clearly fills the gap and provides a real solution to giving members of the community their best chance in this volatile situation. We fit heating systems, why not sprinklers.

Regards

Mark Hayter

Group Manager Mark Hayter | Head of Protection, West Sussex County Council
West Sussex Fire & Rescue Service

045-17935 - TA Fire and Security Solutions

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Mr P M Schenk MIFPO MIPSA

Organisation (if applicable): T/A Fire & Security Solutions

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments: If the measure is implemented

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: If the measure is implemented

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: See Q13

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: A mechanical or electrical device cannot be relied upon to work in an emergency, especially at some unknown time in the future, without test and maintenance

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: If the measure is implemented, however, Building Regulations only apply to construction and alteration; the Area Fire Authority is the inspecting & enforcement authority after occupation and unless the RRO 2005 is altered, I cannot see any lawful way the measure can subsequently be enforced

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[27] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☒
Comments: I cannot see that Wales can train sufficient competent engineers within an acceptable timescale

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments: If the measure is implemented

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: The analysis is excellent, as far as it goes

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments: See Q13

[27] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

1 The statistics for fatalities and injury are not specific enough; did the event occur in a dwelling, a hotel, a place of work?
It appears that the Welsh Assembly Government has simply seized on sprinklers as a universal "cure all" to improve fire safety, without good advice on cheaper, simpler more easily implemented measures that would also reduce fatalities, injuries and damage to property;
2 Early warning
Analogue, addressable fire detection systems, are now so sophisticated that they can sound an alarm, and identify an individual space or room **before a fire actually starts,** allowing for smoke and heat free evacuation and early service intervention.
3 Passive Fire Safety
The provision of "protected" exit routes with Fire Doors/Walls is already in place for most sleeping accommodation; however, effective "fire stopping" to prevent the passage of smoke between rooms and sleeping spaces (especially domestic dwellings) is also likely to have a beneficial effect i.e. "smoke kills"
3 Design (dwelling)
A simple design change that required, where there is a single suitcase only in a sleeping premises, (including single family dwellings) that staircase shall be "protected" and shall lead directly to a final exit, without the necessity to pass through another room.
4 Fire suppression systems
British Standards are not mandatory; their status in UK law is advisory i.e. "an acceptable" specification to be met or exceeded if possible.
Tens of thousands of water mist systems are in use around the world, statistics show that they extinguish fires as effectively as sprinklers with only 50% of the water.
If a manufacturer can produce statistical, test and scientific evidence, that their system is effective, reliable & practical, I believe it would be "reasonable" for the authorities to accept it.
The above list is not claimed to be exhaustive or complete.

046-17935 - IPS Flowsystems

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Les Walker

Organisation (if applicable): IPS Flowsystems

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes X☐
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes X☐
No ☐
Comments: It's a pity you cannot include schools, sadly many schools are lost each year in the UK due to arson.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes x☐
No ☐
Comments: I am very familiar with BS9251, it was the first attempt to create such a standard in the UK. It is far from perfect but is good place to start. I am pleased to say that a review of this standard has started and the "Sprinkler Industry" is being consulted and allowed to contribute. When the revised version comes out it should be a much more appropriate document to address

the need for Residential Sprinklers. So yes – this is the right standard to reference.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes x☐
No ☐
Comments: This makes very good sense, as it also provides an answer to those who feel that “conventional fire sprinklers” are not the correct solution.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No x☐
Comments: It would be true to say that there is not much maintenance required for Residential Sprinkler Systems. However, it does require someone who is trained and understands how they operate to confirm from time to time (at least annually) that the system is operating correctly. Perhaps the two most common potential causes of failure are: - 1. Someone paints over the cover plate of a concealed sprinkler head. So an annual visual check makes very good sense. 2. If the system requires a tank and pump, this does need some simple maintenance. The biggest risk is that the pump shaft seizes and the pump will not operate at the crucial moment. There are devices available to remotely “turn over” the pump on a weekly basis and thus prevent the shaft seizing. It may be better to ensure that where a pump is fitted, that such a device is required. Such devices can also monitor the status of the system and report actuations and faults via a simple telephone link. I have such devices attached to the gas and electric meters in my home, and the power company dials the device remotely (it’s a very simple form of mobile phone). I think this would be a better option than to legislate.

Question 6: Do you agree with the proposal to produce a householder’s guide to encourage the maintenance of fire suppression systems?

Yes x☐
No ☐
Comments: The householder should have some form of simple handbook. It should state somewhere “DO NOT OVERPAINT SPRINKLER HEADS”. It should also contain the contact details of the installer and an organisation such as BAFSA, so the householder has a point of contact should the contractor go out of business. It should contain the initial design parameters of the system e.g. the design pressure and flow – so that in the future any contractor can look at this and check that the system is operating correctly..

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes x☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[28] remain relevant given the proposals covered by the new legislation?

Yes ☐
No x☐
Comments: I believe that steps are underway via Neath Port Talbot College to add a specific section that will deal with the installation of residential sprinkler systems – this is highly necessary.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☐
Comments: This is a difficult question to answer as it will depend on how this whole new venture develops. I hope that what is being done in Wales, will be extended to the rest of the UK and that we will eventually have a scheme similar to the "Gas Safe" registration required for the installation of gas in residential properties.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes x☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

[28] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No x☐
Comments: Without doubt the objective should be to save lives and the suffering that results from the burns many people receive as a result of fire. To be rather brutal about things, once a person is dead the cost is finite. For those that are badly burned (quite apart from the human suffering) the cost to the state is very substantial and I do not believe that this real financial saving has been added in to the cost benefit analysis.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes x☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

047-17935 - Drac Consulting

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Dave Fletcher

Organisation (if applicable): DRAC CONSULTING Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: Extend to include hotels, hostels and similar premises

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: Compulsory annual inspection

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: But taken too long

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[29] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

[29] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☐
Comments: No comment

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☐
Comments: No comment

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

048-17935 - Cheshire Fire and Rescue Service (Keith Brooks)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Keith Brooks

Organisation (if applicable): Cheshire Fire & Rescue Service

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: This should be treated the same as any other household installation and should be the responsibility of the homeowner but where premises are subject to the Regulatory Reform (Fire Safety) Order 2005 they should not be exempt from the maintenance requirements.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[30] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

[30] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

This appears to be a very measured and proportionate approach to the protection of life from fire and is fully supported by Cheshire Fire and Rescue Service.

049-17935 - James Player

WG 17935

Welsh Government

Consultation Document – Response James Player, Player Project Management

Chapter 2

1. Yes I agree with proposed approach.
2. Yes I agree with proposed list of Residences.

Chapter 3

3. Yes I agree that BS9251 should be the main standard.
4. Yes I agree that the guidance should remain flexible that achieve BS or equivalent standards.

   I think also that discretion should be given to BC to accept an alternate system that has Internationally Recognised Standard or pending BS/ European Standard.

There were no questions in this Section on Water Supply. Paragragh 116 needs more emphasis in final Guidance for designers and developers if they are to be accountable for the design solution – the risk approach seems sensible. The Water Companies stance remains defensive and the bullet points noted in 110 worry me as their current stance remains in most instances with regards to development queries is they won't discuss until there is a Planning Permission and they then want payment to quote or carry out investigations / quotation, they then want up to 6 months to quote. This is a much wider issue than the Dom Fire Regs with DCWW impact on development but I fear the promised data won't be made available until too late to make any proper decision on direct or indirect. The regular pubilishing of pressure data and available flow rates for the guidance of designers would be a much more proactive approach and relieve some of the major concerns about the loss off roof space and increased costs of an indirect supply.

Chapter 4

5. Yes I agree.
6. Yes I agree – could this be a requirement of any Competent Person Scheme that as part of Installation they are required to provide this Guide?

Chapter 5

7. Yes. Would like to understand the Transitional Arrangements for projects that register for B'regs between Sept 13 and Apr 14.

Chapter 6

8. Yes it seems so.

9. No I am not sure the existing systems will be able to cope with the increase in demand across Wales in the timescales. There will be a dramatice increase in demand for domestic sprinkler services from Apr ’14 and I am unclear as to whether the skill base is extensive enough in the short term.

Part 2

10. Yes.
11. Not sure. Hard wiring of smoke detectors and awareness of public in this area may have reduced deaths not captured in CBA.
12. Most. Cumulative Impact of recent legislation –Part L and Dom Fire Regs……it is very challenging market, not sure impact if some of large private developers pull out.

Further Comments – see Chapter 3 note above on Water Supply.

I confirm I do not need my response to be kept confidential.

Kind regards,
James Player

050-17935 - Cumbria Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: GM Mike Smith

Organisation (if applicable): Cumbria Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes; This will ensure technological change will be incorporated into the regulations

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes
Comments: The wording seems off on this but I do consider that a requirement to maintain systems where provided should be incorporated into the system

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[31] remain relevant given the proposals covered by the new legislation?

Yes

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

[31] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: No other comments

051-17935 - Nottinghamshire Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Frank Swann

Organisation (if applicable): Nottinghamshire Fire & Rescue Service

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[32] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐

[32] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

052-17935 - Denis Moon

Dear Sir,
While I understand that sprinklers in new builds, renovations is a good idea, I think it is totally impractical and too costly.
The only people to benefit are the manufacturers, regulators, and inspectors.
Householders will have to bear the installation costs and the cost of ongoing inspection, and maintenance, and if there is a malfunction it will be disastrous.
Most house fires in Wales do not occur in new builds, and the number of premeditated arsons is low.
Denis Moon

053-17935 - North Wales Fire and Rescue Service (Legislative fire safety development manager)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Bob Mason

North Wales Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes x☐
No ☐
Comments: this will allow new properties to comply with the measure.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes x☐
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes x☐
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes x☐
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes x☐
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes x☐
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes x☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[33] remain relevant given the proposals covered by the new legislation?

Yes x☐
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes x☐

[33] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

No ☐

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes x☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: Will the guides used by Fire Safety officers for interpretation of the RRO need to be altered to reflect the changes to new commercial properties brought about by these measures?

054-17935 - Viking SupplyNet Ltd (Matthew Stephens)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Matthew Stephens

Organisation (if applicable): Viking Supplynet Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[34] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐

[34] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

055-17935 - South Wales Fire and Rescue Service (Ritchie O'Connell)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Fire and Rescue Services Wales
C/O Ritchie O'Connell

Organisation (if applicable):

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments: This method is the most appropriate for implementing the Measure. Without an amendment to Building Regulations which clearly stipulates (by way of a new unambiguous regulation) the requirement to fit automatic water suppression systems in those premises covered by the Measure, it would be possible for applicants to argue that they could demonstrate equivalent levels of safety by other means thus negating the requirement to install sprinklers, thereby circumventing the intent of the Measure.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: The list of residences appears appropriate; however more detailed guidance is required regarding the difference between a boarding house and a hotel. Some hotels now house guests on a relatively long term basis, such as families awaiting social housing, providing them with full board. If a premises of this nature , was either newly built or extended and called a hotel by the developers there would be no requirement for sprinklers, if on the other hand in a true reflection of its intended purpose it was called a boarding house sprinklers would be required.

Whilst distinctions such as this may appear pedantic, it is precisely this level of detail which the regulating authorities will have to deal with; more detailed guidance regarding the exact nature of the categories of residence, either in the Measure or as supporting guidance would be essential

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: For the majority of premises caught by the Measure BS9251 would provide an appropriate standard, whilst for some larger premises BS12845 may be more suitable.

The potential for installers and designers to derogate from the standard should not be excluded; strict adherence to BS9251 would require that only parts conforming to BS9252 would be acceptable. At the moment there are no sprinkler heads available which conform to this standard. The designer should retain the option to use alternative components, as is the case presently, as long as those components are tested to an accepted standard such as UL 1626 where there is a data sheet available which supports their suitability for the application in question. Similarly where a designer chooses to utilise another standard such as NFPA13d for the entire system this should be permissible within the Measure as long as the proposed standard has been robustly tested and found appropriate for the application in which it is to be used.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Whilst some degree of standardisation is necessary over-prescription could have the effect of stifling innovation.
Whatever standard is utilised, the suppression system must be suitable for the application it is being proposed for and must be designed and installed to a recognised standard. In house testing alone should not be acceptable.
Any system installed must be true to the intent of the Measure, providing protection in all those areas of the building caught by the Measure. It should not be sufficient for a designer to propose a system which would protect only the access rooms and escape routes, due cognisance must be given to the fact that 53% of all fire fatalities occur in the room of origin and it is within these rooms that the Measure will have its greatest impact.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒

Comments: For those premises and parts of premises which fall under the Regulatory Reform (Fire Safety) Order 2005 the maintenance of suppression systems can and should be enforced under the Order. Article 17 of the Order states:

17.—(1) Where necessary in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order or, subject to paragraph (6), under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.

This is of particular relevance where design freedoms are allowed on the basis of sprinkler provision which would have the effect of reducing the passive structural elements of fire safety such as fire doors, compartmentation and fire resistance.

For those premises and parts of premises which do not fall within the order then, whilst not ideal, the proposal not to regulate is acceptable due to the difficulties which would be experienced in trying to regulate the maintenance of the systems.
If systems are mains fed the maintenance requirements are minimal: the heads and pipework require no maintenance, the only part of the system which requires regular maintenance is the pump which is fitted to tank and pump systems, or the jockey pump if fitted. For this reason mains fed systems should be fitted wherever possible.
The problems of lack of maintenance will reduce over time as market forces come into operation. Currently many householders use service providers to maintain their heating systems and many of these service providers such as gas undertakers have branched out into other areas of house maintenance; it is not unreasonable to assume that these companies will also tender for sprinkler maintenance as it is relatively straightforward.
Additionally some companies are now offering a self starting pump set which turns over weekly or monthly, this would reduce the likelihood of system failure.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: This is an essential element of the Measure; householders are largely unaware of the operation and limitations of a sprinkler system. An easily understood guide will reduce the incidence of fire suppression systems being rendered ineffective by over painting of sprinkler heads, placing large items of furniture within close proximity to heads/ nozzles etc.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No ☒
Comments: Whilst it is accepted that the impact for builders, particularly S.M.E.s may be considerable, and that a transitional period of 6 months would in some degree offset the impact, this leaves considerable scope for developers to make Building Regulations applications for large numbers of buildings which could significantly reduce the number of sprinklered buildings in the first three years of the Measure.
The benefits to the building industry from the proposed approach will largely be available to the larger concerns only as they have the financial capacity to acquire land, planning permission and Building Regulations approval, it will be of limited value to S.M.E.s in the industry as they will lack the capacity to forecast and pre-plan to the same degree.
The design implications of the new standard have to a large extent been addressed by existing guidance, system design will be of approved standards which are already available, the design freedoms, or 'trade-offs' are largely those which currently exist within the approved documents and British Standards.
The building industry has had almost two years to address training and supply chain issues, as discussed above the specifications need no development as they are existing.
There is a significant impact for the Fire and Rescue Services in Wales. Each of these Services will be consulted on all Building Regulation applications within their service area for premises which are caught by the Regulatory Reform (Fire Safety) Order 2005. If they are subjected to a large number of large scale developments intended for the following three years this will significantly stretch the available legislative fire safety resources.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[35] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: The issue of fitness for purpose will not be affected by the implementation of the regulations;
The capacity however may not be sufficient. Consideration should be given to an approvals process for any companies seeking to enter the training provision market in order to reduce any possible reduction in training delivery standards.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒ With reservations
No ☐
Comments: Whilst the majority of the changes are appropriate, paragraph 18.13 in Approved Document B volume 2 – Buildings Other than Dwellinghouses implies that a sprinkler system installed to BS: 9251 would be appropriate for use when designing a mechanical smoke extraction system for a basement, BS12845 allows a designer to choose a nominal fire size of mW based on assumed maximum area of operation, this is not possible under BS9251 and an assumption of a 5mW fire may be incorrect.
Additionally the issue of duration of supply could have serious implications for firefighters, firefighting in basements is arduous and dangerous, and therefore time must be taken before affecting entry to ensure that all health and safety protocols are being observed. A residential system installed under BS: 9251 has a guaranteed supply of 30 minutes and this is likely to be sufficient to control the fire until internal firefighting operations can be commenced. However a domestic system under 9251 has a guaranteed supply of only 10 minutes and the system would have ceased to operate before firefighting operations can be commenced; this substantially increases the risk to firefighters. Mechanical ventilation of basements should be acceptable only where a BS: 12845, or equivalent, system is provided.

[35] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments:
The cost benefit analysis for Wales follows the same methodology as the 3 previous analyses, these analyses use the 'green book' estimated cost which is based on the Department of Transports cost of a death figure. This figure does not take into account the cost of fire service attendance; this seems incongruous when assessing the cost of fire. It is reasonable to assert that the inclusion of these not insubstantial costs would have a positive effect on the cost benefit analyses, possibly bringing further premises into the cost neutral or cost beneficial outcomes of the analysis.
The costs for tanks and mains connections, even taking into account the sensitivity analyses, are overstated. Many new large scale developments will benefit greatly from economies of scale.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒With reservations
No ☐
Comments: Option 3 (Do nothing) is considered as having no cost, however whilst it is accepted that this option calls for no capital outlay, doing nothing will not deliver the net benefit predicted for the previous two options, therefore the cost of doing nothing could be as high as £48.8m (option 1)

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

The issues regarding water supply are overstated, the current situation for firefighting water is that the water undertakers are signed up to the Water UK National Guidance Document on Water for Firefighting, despite this they are unable to guarantee the supply for firefighting to the flow requirements of this document. Where these requirements cannot be met the developer is supposed to provide a 45000 litre tank supply for firefighting. The developers take great pains to demonstrate that, whilst the water undertakers will not guarantee supply to the flows and quantity required, the day to day

requirements for potable water for general household purposes are such that at any given time the water supply to the development is adequate to meet the flow requirements for firefighting purposes.

Housing developments with units of detached or semidetached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any single hydrant. This equates to 480l/min, more than adequate for a BS: 9251 domestic standard sprinkler system which requires 109 l/min

Multi occupied housing developments with units of more than two floors should have a water supply capable of delivering a minimum of 20 to 35 litres per second through any single hydrant on the development. This equates to 2100l/min, more than adequate for a BS:9251 Residential standard sprinkler system which requires 210 l/min

056-17935 - Henstaff Construction

Dear Sirs,
my comments are as follows: -

1. We build houses for sale and we believe that they will be difficult to sell with sprinklers. This is the national housebuilders view as well, and we will lose them to all but the most prosperous part of the M4 corridor.

2. Much has been said about cost, but I believe that the main disadvantage will be the possibility of wholesale damage when the sprinklers are set off accidentally or maliciously. I would not wish to live in a house with sprinklers.

3. Generally anything that adds cost to building in Wales disadvantages us against England. We are in competition and will lose out against English sites. This will be bad for our economy just when we desperately need work.

4. A better approach to fire safety would be to ensure that all existing housing is fitted with smoke alarms, preferably off the mains.

Regards

Eric Brooks-Dowsett

Henstaff Construction Ltd

057-17935 - South Wales Fire and Rescue Service (Richard Webb)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Richard Webb

Organisation (South Wales Fire and Rescue Service):

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments: This method is the most appropriate for implementing the Measure. Without an amendment to Building Regulations which clearly stipulates (by way of a new unambiguous regulation) the requirement to fit automatic water suppression systems in those premises covered by the Measure, it would be possible for applicants to argue that they could demonstrate equivalent levels of safety by other means thus negating the requirement to install sprinklers, thereby circumventing the intent of the Measure.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: The list of residences appears appropriate; however more detailed guidance is required regarding the difference between a boarding house and a hotel. Some hotels now house guests on a relatively long term basis, such as families awaiting social housing, providing them with full board. If a premises of this nature , was either newly built or extended and called a hotel by the developers there would be no requirement for sprinklers, if on the other hand in a true reflection of its intended purpose it was called a boarding house sprinklers would be required.

Whilst distinctions such as this may appear pedantic, it is precisely this level of detail which the regulating authorities will have to deal with; more detailed guidance regarding the exact nature of the categories of residence, either in the Measure or as supporting guidance would be essential

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: For the majority of premises caught by the Measure BS9251 would provide an appropriate standard, whilst for some larger premises BS12845 may be more suitable.

The potential for installers and designers to derogate from the standard should not be excluded; strict adherence to BS9251 would require that only parts conforming to BS9252 would be acceptable. At the moment there are no sprinkler heads available which conform to this standard. The designer should retain the option to use alternative components, as is the case presently, as long as those components are tested to an accepted standard such as UL 1626 where there is a data sheet available which supports their suitability for the application in question. Similarly where a designer chooses to utilise another standard such as NFPA13d for the entire system this should be permissible within the Measure as long as the proposed standard has been robustly tested and found appropriate for the application in which it is to be used.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Whilst some degree of standardisation is necessary over-prescription could have the effect of stifling innovation.
Whatever standard is utilised, the suppression system must be suitable for the application it is being proposed for and must be designed and installed to a recognised standard. In house testing alone should not be acceptable.
Any system installed must be true to the intent of the Measure, providing protection in all those areas of the building caught by the Measure. It should not be sufficient for a designer to propose a system which would protect only the access rooms and escape routes, due cognisance must be given to the fact that 53% of all fire fatalities occur in the room of origin and it is within these rooms that the Measure will have its greatest impact.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒

Comments: For those premises and parts of premises which fall under the Regulatory Reform (Fire Safety) Order 2005 the maintenance of suppression systems can and should be enforced under the Order. Article 17 of the Order states:

17.—(1) Where necessary in order to safeguard the safety of relevant persons the responsible person must ensure that the premises and any facilities, equipment and devices provided in respect of the premises under this Order or, subject to paragraph (6), under any other enactment, including any enactment repealed or revoked by this Order, are subject to a suitable system of maintenance and are maintained in an efficient state, in efficient working order and in good repair.

This is of particular relevance where design freedoms are allowed on the basis of sprinkler provision which would have the effect of reducing the passive structural elements of fire safety such as fire doors, compartmentation and fire resistance.

For those premises and parts of premises which do not fall within the order then, whilst not ideal, the proposal not to regulate is acceptable due to the difficulties which would be experienced in trying to regulate the maintenance of the systems.
If systems are mains fed the maintenance requirements are minimal: the heads and pipework require no maintenance, the only part of the system which requires regular maintenance is the pump which is fitted to tank and pump systems, or the jockey pump if fitted. For this reason mains fed systems should be fitted wherever possible.
The problems of lack of maintenance will reduce over time as market forces come into operation. Currently many householders use service providers to maintain their heating systems and many of these service providers such as gas undertakers have branched out into other areas of house maintenance; it is not unreasonable to assume that these companies will also tender for sprinkler maintenance as it is relatively straightforward.
Additionally some companies are now offering a self starting pump set which turns over weekly or monthly, this would reduce the likelihood of system failure.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: This is an essential element of the Measure; householders are largely unaware of the operation and limitations of a sprinkler system. An easily understood guide will reduce the incidence of fire suppression systems being rendered ineffective by over painting of sprinkler heads, placing large items of furniture within close proximity to heads/ nozzles etc.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No ☒
Comments: Whilst it is accepted that the impact for builders, particularly S.M.E.s may be considerable, and that a transitional period of 6 months would in some degree offset the impact, this leaves considerable scope for developers to make Building Regulations applications for large numbers of buildings which could significantly reduce the number of sprinklered buildings in the first three years of the Measure.
The benefits to the building industry from the proposed approach will largely be available to the larger concerns only as they have the financial capacity to acquire land, planning permission and Building Regulations approval, it will be of limited value to S.M.E.s in the industry as they will lack the capacity to forecast and pre-plan to the same degree.
The design implications of the new standard have to a large extent been addressed by existing guidance, system design will be of approved standards which are already available, the design freedoms, or 'trade-offs' are largely those which currently exist within the approved documents and British Standards.
The building industry has had almost two years to address training and supply chain issues, as discussed above the specifications need no development as they are existing.
There is a significant impact for the Fire and Rescue Services in Wales. Each of these Services will be consulted on all Building Regulation applications within their service area for premises which are caught by the Regulatory Reform (Fire Safety) Order 2005. If they are subjected to a large number of large scale developments intended for the following three years this will significantly stretch the available legislative fire safety resources.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[36] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: The issue of fitness for purpose will not be affected by the implementation of the regulations;
The capacity however may not be sufficient. Consideration should be given to an approvals process for any companies seeking to enter the training provision market in order to reduce any possible reduction in training delivery standards.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒ With reservations
No ☐
Comments: Whilst the majority of the changes are appropriate, paragraph 18.13 in Approved Document B volume 2 – Buildings Other than Dwellinghouses implies that a sprinkler system installed to BS: 9251 would be appropriate for use when designing a mechanical smoke extraction system for a basement, BS12845 allows a designer to choose a nominal fire size of mW based on assumed maximum area of operation, this is not possible under BS9251 and an assumption of a 5mW fire may be incorrect.
Additionally the issue of duration of supply could have serious implications for firefighters, firefighting in basements is arduous and dangerous, and therefore time must be taken before affecting entry to ensure that all health and safety protocols are being observed. A residential system installed under BS: 9251 has a guaranteed supply of 30 minutes and this is likely to be sufficient to control the fire until internal firefighting operations can be commenced. However a domestic system under 9251 has a guaranteed supply of only 10 minutes and the system would have ceased to operate before firefighting operations can be commenced; this substantially increases the risk to firefighters. Mechanical ventilation of basements should be acceptable only where a BS: 12845, or equivalent, system is provided.

[36] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments:
The cost benefit analysis for Wales follows the same methodology as the 3 previous analyses, these analyses use the 'green book' estimated cost which is based on the Department of Transports cost of a death figure. This figure does not take into account the cost of fire service attendance; this seems incongruous when assessing the cost of fire. It is reasonable to assert that the inclusion of these not insubstantial costs would have a positive effect on the cost benefit analyses, possibly bringing further premises into the cost neutral or cost beneficial outcomes of the analysis.
The costs for tanks and mains connections, even taking into account the sensitivity analyses, are overstated. Many new large scale developments will benefit greatly from economies of scale.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒With reservations
No ☐
Comments: Option 3 (Do nothing) is considered as having no cost, however whilst it is accepted that this option calls for no capital outlay, doing nothing will not deliver the net benefit predicted for the previous two options, therefore the cost of doing nothing could be as high as £48.8m (option 1)

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

The issues regarding water supply are overstated, the current situation for firefighting water is that the water undertakers are signed up to the Water UK National Guidance Document on Water for Firefighting, despite this they are unable to guarantee the supply for firefighting to the flow requirements of this document. Where these requirements cannot be met the developer is supposed to provide a 45000 litre tank supply for firefighting. The developers take great pains to demonstrate that, whilst the water undertakers will not guarantee supply to the flows and quantity required, the day to day

requirements for potable water for general household purposes are such that at any given time the water supply to the development is adequate to meet the flow requirements for firefighting purposes.

Housing developments with units of detached or semidetached houses of not more than two floors should have a water supply capable of delivering a minimum of eight litres per second through any single hydrant. This equates to 480l/min, more than adequate for a BS: 9251 domestic standard sprinkler system which requires 109 l/min

Multi occupied housing developments with units of more than two floors should have a water supply capable of delivering a minimum of 20 to 35 litres per second through any single hydrant on the development. This equates to 2100l/min, more than adequate for a BS:9251 Residential standard sprinkler system which requires 210 l/min

061-17935 - TYCO Fire and Security

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: ***Martin Harvey***

Organisation (if applicable): ***TYCO Fire and sec*urity**

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes x
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes x
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes x
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes x
No ☐
Comments: This we would assume will be for water based systems only. Tthis is essential to allow other appropriate technologies. The watermist DD8458 is scheduled to be converted to a BS.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No
Comments: This should apply to private dwellings only, as confusion may occur in other sleeping premises such as flats, where the maintenance responsibility will be assumed to have been completed by others. As these are intended as life safety systems their maintenance by competent people is the only way to ensure that sprinklers systems are in a state of fully operational readiness if and when a fire occurs. Not to do so will put lives at risk, it will mean the initial investment was wasted. Any subsequent sprinkler system failures will be blamed on the failure to maintain and the failure in legislation to require it.. We have MOTs on cars for the same basic reason.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes x
No ☐
Comments: Yes agree a basic guide would be helpful

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[37] remain relevant given the proposals covered by the new legislation?

[37] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes
No ☒

Comments: As BS9251 is the technical basis then only companies who are 3rd party accredited and audited can design, supply, install and commission AND CERTIFY COMPLIANCE for such systems.
By all means retain the NOS for the installer element within and under the auspices of the accredited sprinkler engineering company. Only in the way can compliance with BS9251 be delivered.

The NOS cannot deliver sprinkler systems compliant to BS9251, the can deliver good sprinkler pipe installation practices, using the designs and equipment, and under the supervision, of sprinkler system engineers.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes x
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes x
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes
No ☒
Comments: BRE's cost benefit analysis is at the extreme high end.
Their costing are based upon only one house being done and needing a pump and tank.

Housing developments with town's main feeds will produce a much more cost attractive picture.
Welsh Water have agreed to providing 32mm connections for all new houses to facility spklr protection.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes x
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

062-17935 - Fire Protection Association

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Simon Bird

Organisation (if applicable): The Fire Protection Association (FPA), also providing technical representation for the Association of British Insurers (ABI).

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No ☒
Comments: Whilst we welcome the ambition to improve fire outcomes, we believe a more targeted deployment (including retrofit to existing building stock) of sprinkler systems (to the right quality) to higher risk domestic and residential properties would achieve more improvement, more quickly for less cost.

A further consideration; in specifying that “each residence (to which the Measure applies) must be provided with an automatic fire suppression system” is that no meaningful consideration appears to have been made to varying levels of availability, reliability and maintainability of such ‘suppression systems’. We are concerned that this could result in the deployment of systems of widely varying quality and performance; both in respect of fire fighting capability and escape of water incidents. We believe the type of suppression system should be tightly constrained to those of known to have acceptable levels of reliability, Our opinion is that currently sprinkler systems that comply to BS 9251, BS EN 12845 or LPC Rules (as appropriate) are the only system types that will deliver adequate required levels of protection but would caveat that even these specifications (and associated guidance) require further work to address possible deficiencies such as on piping and jointing quality; hazard assessment and matching with the appropriate level of mitigation. A further concern is over the apparent assumption that future fixed firefighting technologies made the subject of a full British Standard (BS) should automatically qualify as a system of equivalent performance (as, for example, a sprinkler system to BS 9251). We have this concern because we are unaware of their being any process in place to assure of such outcome in the British Standard drafting process. Instead it ought to be incumbent upon

prospective users (i.e. the Welsh Assembly Government in this case) of 'new' technology types to perform their own in-depth analysis of costs and benefits associated with each technology type.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments: We believe a more targeted deployment (including retrofit to existing building stock) of sprinkler systems (to the appropriate specification and quality) to higher risk domestic and residential properties would achieve more improvement, more quickly for less cost.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☐
No ☒
Comments: We believe BS 9251, BS EN 12845 or LPC Rules (as appropriate) should be referenced as minimum standards. Further guidance should be produced to address possible areas of deficiency in these documents (such as on piping and jointing quality, hazard assessment and matching with the appropriate level of mitigation).

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Provided it is not assumed that progression to BS status alone assures of sufficient pedigree. To make such a link could be a totally unfounded leap of faith. Thorough investigation of other suppression systems should be undertaken by the Regulator with input from a Technical Advisory Panel which should include insurers and other stakeholders prior to their adoption.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒

Comments: Maintenance is essential assurance that the system remains operable and appropriate for the risk it is designed to protect and ‘t should be subject to regulation. Non mandatation of appropriate minimum levels of maintenance will mostly likely lead to a degradation of system performance over time, diminished ability to save life, damage to the reputation of suppression systems, exacerbation of the extent of water damage losses suffered in all affected housing stock.

Question 6: Do you agree with the proposal to produce a householder’s guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Yes, in addition to mandating appropriate minimum levels of maintenance.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☐
No ☒
Comments: See previous comments, which would impinge upon the implementation strategy adopted in the changes to the Building Regulations and guidance.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[38] remain relevant given the proposals covered by the new legislation?

Yes ☐
No ☒
Comments: We think this framework will be useful. We think it likely that given the scale of the change that will be triggered by the introduction of the measure and that we believe new guidance is already required in support of the change (for example as identified in this response), we would consider it unlikely that existing sources of training are fully fit for purpose. We consider it essential that those concerned with specifying, designing, installing and maintaining systems are competent to do so and supported by a robust suite of Regulations, Standards, Guidance, Training, Certification, surveillance and feedback mechanisms.

[38] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☐
No ☒
Comments: We think it likely that given the scale of the change that will be triggered by the introduction of the measure and that we believe new guidance is already required in support of the change (for example as identified in this response), we would consider it unlikely that existing sources of training are fully fit for purpose. We consider it essential that those concerned with specifying, designing, installing and maintaining systems are competent to do so and supported by a robust suite of Regulations, Standards, Guidance, Training, Certification, surveillance and feedback mechanisms.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No ☒
Comments: See previous comments, which would impinge upon the implementation strategy adopted in the changes to the Building Regulations and guidance.

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: We are concerned that no consideration to possible water damage impact has been incorporated. Reliability aspects appear not to be sufficiently understood (relationships between cost of maintenance, uptake and (assumed) diminishing system performance).

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☒
Comments: Possibly not. As we question some fundamental underpinning assumptions (e.g. Reliability, CBA approach and proposed structure of the implementation), this could impact upon the material used in the RIA.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: We would very much like to see the initiative progress, if the points we identify in our response could be satisfactorily addressed.

063-17935 - West Midlands Fire Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: John Llewellyn

Organisation (if applicable): West midlands Fire Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes

Comments: Think it is important to set out technical guidance in the revision to the ADB

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes

Comments: Could identify 28(e) as being referred to as a HIMO

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes

Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes

Comments: Other systems need to be referred to and adopted where necessary if requirements are in excess of the capability of a BS 9251, however the majority of the premises targeted would be satisfactorily covered using BS 9251

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes

Comments: Only because of the difficulty in Policing it.
Efforts would be better spent on educating the public to take responsibility for maintenance

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes

Comments: This would support Question 5's Comments

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes

Comments: The approach allows sufficient time to prepare for the changes.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[39] remain relevant given the proposals covered by the new legislation?

Yes
Comments: These standards could be updated as required

[39] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes

Comments: Obviously the training requirement will be monitored and access for further training must be made available.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes

Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes

Comments: Seems reasonable – only future monitoring will confirm benefits

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes

Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

Hopefully the future success in Wales will be extended to the rest of the UK

064-17935 - Cleveland Fire Brigade (Noel Cornforth)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Noel Cornforth

Organisation (if applicable): Cleveland Fire Brigade

email / telephone number:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[40] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐

[40] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

I think that this is an excellent Measure and should be supported. It will undoubtedly save lives in the future and needs to be congratulated. I hope that other governing bodies take note of the foresight shown by the Welsh assembly and follow suit.

065-17935 - Omega Fire Engineering

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Dane Owen

Organisation (if applicable): Omega Fire Engineering Ltd

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☐
No ☒
Comments: See attached letter

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☐
No ☒
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: As this would not be enforceable

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[41] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

[41] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☐
No ☒
Comments: With over 4,000 new homes being built more training will be needed before the introduction

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☐
No ☒
Comments: Regulations in Wales should remain harmonised with England

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: Demand will outstrip availability and lead to inflated costs

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☒
Comments: Will this prevent the use of BS9991 in Wales?

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: See **Attached Letter**

Omega Fire Engineering

Sun House

2-4 Little Peter St

Manchester
M15 4PS
Ref:L130502 –WalesSprink
2nd May 2013

Andy Thomas
Butler and Young Ltd

Dear Andy,
Further to the recent correspondence, I again would like to apologies not being able to attend in person but would appreciate if you could raise and consider the below thoughts at the Building Regulations Wales Seminar on Friday:
- As Wales will be issuing their own Building Regulations, will Approved inspectors from England be permitted to work within Wales and vice versa?
- As the cost benefit completed by BRE found that “fitting sprinklers in all new residential premises in Wales is not cost effective” why is it proceeding? Especially within single domestic properties where the cost could be £2,000 or more with £100 per year maintenance for little benefit. Given the current economic situation is it reasonable to be adding to construction costs consistently, whether this is through increases on Part L or Part B to the Building Regulations.
- I would be interested to know the figures of fire deaths within homes built within the last 10 years that were fitted with main operated, interlinked smoke alarms. I would suggest this would be very low and most deaths would originate from older housing stock.
- Will British Standards still be permitted to be used within Wales i.e. BS 9999 and BS 9991 which do not require sprinkler within some residential/domestic properties?
- I note BS 9991 is referenced within the proposed ADB for Wales. I note that suppression is not proposed within hotels, hostels and short stay hostels but surely these are a greater risk than single domestic properties?
- The reason why suppression is installed needs to be clear, is this for means of escape i.e. protecting the stair, fire-fighting i.e. due to potential remote location of fire stations or property protection. Clarification on this will aid in

potential fire engineered solutions to remove the requirement where additional compensatory features are provided.

- How will the maintenance elements be managed and who will enforce this, is this Building Regulations, HMO licensing, Regulator Reform Order etc?
- Have additional features been considered to aid in the longevity of the system, ie connecting the sprinklers to the toilet cistern such that on flushing the chain the system is washed through? This also provides a good indicator if the system stops operating and should prevent isolation. Concealed heads should be considered and preferably permitted as it will prevent systems being removed.
- Given central government are making efforts to standard regulations by the removal of local acts earlier this year to be creating such a segregation between England and Wales in term of construction regulations would appear to be a large step backwards.

Kind Regards

Dane Owen
Director
Omega Fire Engineering

066-17935 - Norman Bond

I am a resident of Wales and have no connection with construction or building trade whatever. I am a house owner.

I have 3 comments of the proposal to put fire sprinklers in all new and converted homes.

1) I cannot see in your consultation paperwork any estimate of how many lives will be saved if sprinklers are fitted. A research by an independent body of all (or a fair sample) of deaths in home fires would tell you how many would reasonably have been saved if sprinklers had been fitted. They should also be categorised into different types of houses.
2) If I had a house with a sprinkler fitted, the first action would be to disable it. I would far rather take the small risk of death by fire than risk a sprinkler going off on computer, photos, books and papers which may be irreplaceable.
3) Have you consulted with the insurance industry about the potential increase in Insurance for Welsh homes where sprinklers go off for say a chip pan fire and the enormous extra cost of water damage??

Norman Bond

067-17935 - Cleveland Fire Brigade (Dave Turton)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: D Turton

Organisation (if applicable): Cleveland Fire Brigade

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes X☐
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes X☐
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes X☐
No ☐
Comments:

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes X☐
No ☐
Comments:

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes X☐
No ☐
Comments:

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes X☐
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes X☐
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[42] remain relevant given the proposals covered by the new legislation?

Yes X☐
No ☐
Comments:

[42] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes X☐
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes X☐
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes X☐
No ☐
Comments:

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes X☐
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

068-17935 - Shropshire Fire and Rescue Service

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Martin TIMMIS

Organisation (if applicable): Shropshire Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments: We agree with the approach

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: We agree

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☐
No ☒
Comments: References to BS should include “or equivalent”. This is because in commercial premises (of which many provide dwelling type accommodation) there will be a risk based approach and the higher standard may still be preferable and appropriate, rather than the lower domestic standard being applied across the board which appears to be the implication here.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: The use of other standards should be accepted where those standards adequately manage/control the risk.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☐
No ☒
Comments: We are not entirely comfortable with removing the requirement to test across the board. In commercially operated premises the RR(FS)O applies and testing can be policed by LA FRS. In single private dwellings we agree that testing cannot be policed, but should certainly be encouraged.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments:

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: We agree wholeheartedly. The approach may support further advancement throughout the remainder of the UK.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[43] remain relevant given the proposals covered by the new legislation?

[43] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Yes ☒
No ☐
Comments:

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments:

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: If anything we consider the latest CBA to be rather conservative related to single domestic dwellings

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

069-17935 - Ann Jones AM

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Ann Jones AM

Organisation (if applicable): National Assembly for Wales

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments: This law will give assurance to communities that their homes are safe and sustainable.

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments: The whole of the housing market needs to be included as men, women and children are the most common causes of fire and they can occur in any home regardless of economic or social standing.

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: BS 9251 is the recognised as an industry leading standard.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: Provided that safety is not compromised.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Maintenance is a issue for the home owner – just like maintenance of central heating systems.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: Very sensible proposal.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments: These regulations are coming at the end of a very long legislative process and should be introduced ASAP.

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[44] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐

[44] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Comments: Sprinklers are the ultimate in lifesaving fire equipment and these regulations can build on the current suite of standards to give maximum protection.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: A great opportunity to enhance skills.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☒
No ☐
Comments: The costs have been carefully worked out and any press speculation on the costs by self-interest groups ie. Housebuilders should be dismissed.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☒
No ☐
Comments:

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here: I want to see these regulations implemented as soon as possible to start to tackle the stubborn number of fire deaths that occur year on year many of which can be avoided by the introduction of sprinklers in all new builds.

070-17935 - Cheshire Fire and Rescue Service (Mandy Eeles)

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Mandy Eeles

Organisation (if applicable): Cheshire Fire & Rescue Service

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments: Reports suggest that for residential and domestic premises that BS9521 provides a high standard of cover. The organisation I work for are members of industry bodies British Automatic Fire Suppression Association (BAFSA) and the National Fire Sprinkler Network (NFSN) and the sprinkler stops notified to the groups would suggest good levels of operational effectiveness and reliability of sprinkler systems connected to the mains water system in accordance with BS9521.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: I think it is imperative that any systems (automatic fire suppression systems or otherwise) comply with the requirements of relevant British Standards where they are installed to meet the requirements of Building Regulations. Considering the above, I agree that there may be other water based suppression systems which can provide levels of protection similar to that afforded by BS9251.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: It is important to maintain fire suppression systems to ensure they remain fully operational. If owners/end users are educated about the necessities of suitable and regular repairs and checks of such systems they may be more willing to 'take ownership' of ongoing maintenance.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: As per response to Q5 above a robust education programme would be of benefit to the industry and end users alike.

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[45] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments: It is considered that NOS are an important means of ensuring that installation technicians are not only fully trained, but trained to an agreed occupational standard to maintain high installation standards.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: I would agree, although it is considered that the availability of training will need to be expanded to other geographical areas to provide ease of access for those wanting to undertake sprinkler installation work.

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: I would suggest that the more recent cost benefit analysis undertaken by the BRE and commissioned at the request of the Chief Fire Officers Association (published March 2012) should also be considered as providing a more balanced report.

It is more likely that costs to the NHS and community in terms of fire deaths and injuries are higher than suggested and more likely to be in line with those indicated in research from the USA and other countries.

The issue of water supply connection is critical to the cost benefit analysis and should be more straightforward. It is suggested that connection costs from

[45] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

other UK water providers would be appreciably less than the favoured option stated by Welsh Water.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☒
Comments: Please note comment in response to Q11 above regarding the BRE report commissioned by CFOA. No account is taken in the Regulatory Impact Assessment of the effect the Regulations will have on existing dwellings and the potential for increased retrofitting projects as a result of increased public awareness of the befits of sprinklers.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

The NFSN has suggested that the water regulations be amended to classify water used in domestic and residential sprinkler systems as 'water for fire-fighting'. This would then counteract the requirement for meters to be fitted on the majority of systems.

The ‘Studley Green’ project in Wiltshire illustrated that the fitting of sprinklers was well received by the majority of the home owners involved. Evidence from the USA suggests that house builders are not adversely affected by the requirement to fit sprinklers and may see it as a means to increased revenue by extolling the befits to potential buyers.

Fire Sector Federation

3rd October 2012

London Road, Moreton-in-Marsh, Gloucestershire GL56 0RH

Building Regulations Consultation
Construction Unit
Housing and Regeneration Directorate
Welsh Government
Rhyd y Car Offices
Merthyr Tydfil
CF48 1UZ

6th June 2013
PF/CG/FSF/WG/MEASURE

Our Ref:

Your Ref: WG17935

Dear Sir/Madam

IMPLEMENTING THE DOMESTIC FIRE SAFETY (WALES) MEASURE 2011

I am enclosing the response Form pages 36 to 38 to the Consultation Document number WG17935 on behalf of the Fire Sector Federation, which supports the Welsh Government in its decision to implement the Measure following a lengthy period of process and scrutiny.

The Fire Sector Federation is a not for profit non-government organisation established to act as a forum for the discussion of fire-related issues of interest to its membership and to evolve as a central source of information on all aspects relating to fire. It brings together some **fifty plus representatives** from a range of stakeholders which make up the UK Fire Sector.
Originally formed in 2011 as the Fire Sector Partnership, the Fire Sector Federation was established in June 2012 following a merger with the Federation of British Fire Organisations (FOBFO).

The FSF was originally established in response to the Fire Futures review. Launched in July 2010 by the Fire and Rescue Minister Bob Neill MP, this was a strategic review of fire and rescue provision designed to enable sector partners to shape the future direction of fire and rescue services in England. It was undertaken and led by the sector with contributions from a wide range of representative bodies and organisations.
As a result of the review, the Government made it clear that it no longer intended to control and direct the way fire and rescue services are delivered and instead expects the fire sector to take a lead in shaping policy.

The FSF provides a broad spectrum of opinion from the fire sector. It encourages horizontal integration and attempts to cut silo mentality in working practices by addressing both the built and natural environment, as well as fire and rescue service issues.

The FSF meets regularly in open forum, bringing together the broad knowledge, experience and skills that exist across the sector, with the intent of maximising effective use of this accumulated expertise to improve the safety of the nation.
It seeks to articulate unambiguously, opinions and advice on behalf of the unified sector for the overall benefit of UK communities. It aims to improve communications and cooperation to help drive efficiency, common policy and common standards.

The Federation is a forum for debate, available to any member to convey and hear the views of other members on areas of common concern. Its aim is to share useful information, reduce barriers and improve communications between different areas of the industry.

All partners within the FSF aim to contribute, through collaboration, coordination of effort, expertise and resource, to the UK's national preparedness, resilience, response, mitigation and recovery from fire.

"The FSF will give a voice to the sometimes differing views held within the Federation"

Kindest Regards

Paul M Fuller QFSM MSc BSc FIFireE MInstLM
Deputy Chairman
Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: **Jim Fitzpatrick MP**

Organisation (if applicable): **Secretary, All-Party Parliamentary Fire Safety & Rescue Group - Westminster**

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes **Yes** ☐

☐

Comments: **The Measure passed through the various stages as 'stand alone' primary legislation, but as the timing has now coincided with the transfer of responsibility for Building Regulations to the Wales Government, it seems appropriate to utilise a familiar regulatory process, already understood by those using it.**

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes **Yes** ☐

☐

Comments: **The reasoning behind the choice of residence has been extensively debated and agreed.**

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes **Yes** ☐

☐

Comments: **A reference to the appropriate British Standard would ensure continuity should the Standard be updated or given a different BS number. However the most economical and effective means of supplying water to new developments is by direct connections to mains,**

and this should be the first choice, provided there is an adequate supply of water. It will also simplify maintenance.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes **Yes**☐
☐

Comments: **This is a reasonable position to take, and permits development of alternatives, where approved.**

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes **Yes**☐
☐

Comments: **If it was decided to regulate, there would be a need to enforce the regulation.**

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes **Yes**☐
☐

Comments: **This would have the effect of transferring the responsibility for maintenance away from Government to the house owner or landlord.**

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes **Yes**☐
☐

Comments: **The Fire Suppression Industry is currently installing an estimated 1.8 sprinkler heads annually in the UK, and has been aware of the Measure now for some time, therefore will meet any demands placed on it once the implementation date is included in the Regulations.**

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[46] remain relevant given the proposals covered by the new legislation?

Yes **Yes**☐
☐
Comments: **No further comments**.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes **Yes**☐
☐
Comments: **No further comments**

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes **Yes**☐
☐
Comments: **No further comments.**

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

☐
No **No**☐

Comments: **The Cost Benefit Analysis informs the Regulatory Impact Assessment, and contains some very significant variations from the Cost Benefit Analysis Report, published in March 2012, and written by the same author (BRE) No 264227 rev 1.1, commissioned by the Chief Fire Officers' Association.**
The basis of the water supply costs being a more expensive tank and pump option is not justified, given that the geography of Wales is no different to many English Counties and Scottish Regions.
The connection charge for direct connection to the mains is claimed to be negligible by Scottish Water, when already providing a new pipe installation for the domestic supply.

[46] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

A much more balanced and positive outcome is provided in the CFOA sponsored BRE study than that shown in the respective Executive Summaries and Conclusions of the report for the Welsh Government; where for example the CFOA sponsored report made reference to the fact that the current costs reflect that each application tends to be treated independently and a bespoke solution provided. It goes on to say that if residential sprinklers were in more widespread use, it might be expected that some of the costs, such as installation and maintenance, would reduce. It is also more definitive about the cost benefits of purpose flats and about the opportunities to consider trade off during the design of buildings, which would tend to result in cost savings.
The Welsh Government report fails to mention in its conclusions, future trends and an ageing population, changes to social care and health policies with more people at home; and decreasing funding for public services including the Fire & Rescue Service.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

☐
No **No** ☐

Comments: **The Regulatory Impact Risk Assessment used takes no account of the Impact which the Regulations will have on existing dwellings, and the take up of retrofit sprinklers as a consequence, once society becomes aware of the benefits as a result of growing evidence.**

See also the reasons given in 11 above.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:
The All-Party Parliamentary Fire Safety & Rescue Group has previously supported the decision taken by the Welsh Government, and believes that the decision to require sprinklers in all new dwellings is the correct one. They are more economical and practical to install at build stage, and will inevitably lead to retrospective installation in older dwellings, especially those housing vulnerable groups, as the evidence gathers about the effectiveness of sprinklers in saving lives, reducing burns injuries, reducing damage to property and to the environment.

072-17935 - All-Parliamentary Fire Safety and Rescue Group

ALL- PARTY PARLIAMENTARY FIRE SAFETY & RESCUE GROUP

Chairman: David Amess MP
Vice Chairman: Roger Williams MP
Secretary: Jim Fitzpatrick MP Treasurer: Peter Aldous MP

Hon Administrative Secretary: Ronnie King OBE
Group Officers:Tony Lawson, Andrew Lynch.

Secretariat Office: 19 Douglas Street, Westminster, London SW1P 4PA
Telephone: 01400 281637 mobile: 07836 266614

Building Regulations Consultation
Construction Unit
Housing and Regeneration Directorate
Welsh Government
Rhyd y Car Offices
Merthyr Tydfil
CF48 1UZ

6th June 2013

Our Ref: JF/RK/MEASURE
Your Ref: WG17935

Dear Sir/Madam

IMPLEMENTING THE DOMESTIC FIRE SAFETY (WALES) MEASURE 2011

The All-Party Parliamentary Fire Safety and Rescue Group is appropriately supported and structured, with twenty qualifying Peers and MP's and five non-qualifying members, maintaining the balance of the current Government in Westminster .

The All-Party Parliamentary Fire Safety & Rescue Group fully supports the Welsh Government in its decision to implement the Measure following a lengthy period of process and scrutiny.

This is a major change in UK Fire Safety law, and you are to be congratulated on being the first Country in the world to implement a Measure which will in time, save many lives from the human tragedy associated with Domestic fires.

The Group believes that the Regulations will have a major impact on existing dwellings both in Wales and elsewhere, with the take up of retrofit sprinklers, once society is aware of the benefits as a result of the growing evidence gained in Wales.

I am enclosing the response Form pages 36 to 38 to the Consultation Document number WG17935 on behalf of the All-Party Parliamentary Fire Safety & Rescue Group.

Kindest Regards

Jim Fitzpatrick MP
Secretary

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: **Jim Fitzpatrick MP**

Organisation (if applicable): **Secretary, All-Party Parliamentary Fire Safety & Rescue Group - Westminster**

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes **Yes** ☐

☐

Comments: **The Measure passed through the various stages as 'stand alone' primary legislation, but as the timing has now coincided with the transfer of responsibility for Building Regulations to the Wales Government, it seems appropriate to utilise a familiar regulatory process, already understood by those using it.**

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes **Yes** ☐

☐

Comments: **The reasoning behind the choice of residence has been extensively debated and agreed.**

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes **Yes** ☐

☐

Comments: **A reference to the appropriate British Standard would ensure continuity should the Standard be updated or given a different BS number. However the most economical and effective means of supplying water to new developments is by direct connections to mains, and this should be the first choice, provided there is an adequate supply of water. It will also simplify maintenance.**

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes **Yes**☐
☐

Comments: **This is a reasonable position to take, and permits development of alternatives, where approved.**

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes **Yes**☐
☐

Comments: **If it was decided to regulate, there would be a need to enforce the regulation.**

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes **Yes**☐
☐

Comments: **This would have the effect of transferring the responsibility for maintenance away from Government to the house owner or landlord.**

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes **Yes**☐
☐

Comments: **The Fire Suppression Industry is currently installing an estimated 1.8 sprinkler heads annually in the UK, and has been aware of the Measure now for some time, therefore will meet any demands placed on it once the implementation date is included in the Regulations.**

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[47] remain relevant given the proposals covered by the new legislation?

Yes **Yes**☐
☐

Comments: **No further comments**.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes **Yes**☐
☐

Comments: **No further comments**

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes **Yes**☐
☐

Comments: **No further comments.**

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

☐
No **No**☐

Comments: **The Cost Benefit Analysis informs the Regulatory Impact Assessment, and contains some very significant variations from the Cost Benefit Analysis Report, published in March 2012, and written by the same author (BRE) No 264227 rev 1.1, commissioned by the Chief Fire Officers' Association.**
The basis of the water supply costs being a more expensive tank and pump option is not justified, given that the geography of Wales is no different to many English Counties and Scottish Regions.
The connection charge for direct connection to the mains is claimed to be negligible by Scottish Water, when already providing a new pipe installation for the domestic supply.
A much more balanced and positive outcome is provided in the CFOA sponsored BRE study than that shown in the respective Executive

[47] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

Summaries and Conclusions of the report for the Welsh Government; where for example the CFOA sponsored report made reference to the fact that the current costs reflect that each application tends to be treated independently and a bespoke solution provided. It goes on to say that if residential sprinklers were in more widespread use, it might be expected that some of the costs, such as installation and maintenance, would reduce. It is also more definitive about the cost benefits of purpose flats and about the opportunities to consider trade off during the design of buildings, which would tend to result in cost savings.
The Welsh Government report fails to mention in its conclusions, future trends and an ageing population, changes to social care and health policies with more people at home; and decreasing funding for public services including the Fire & Rescue Service.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

☐
No **No** ☐

Comments: **The Regulatory Impact Risk Assessment used takes no account of the Impact which the Regulations will have on existing dwellings, and the take up of retrofit sprinklers as a consequence, once society becomes aware of the benefits as a result of growing evidence.**

See also the reasons given in 11 above.

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:
The All-Party Parliamentary Fire Safety & Rescue Group has previously supported the decision taken by the Welsh Government, and believes that the decision to require sprinklers in all new dwellings is the correct one. They are more economical and practical to install at build stage, and will inevitably lead to retrospective installation in older dwellings, especially those housing vulnerable groups, as the evidence gathers about the effectiveness of sprinklers in saving lives, reducing burns injuries, reducing damage to property and to the environment.

073-17935 - National Fire Sprinkler Network

Consultation on Domestic Fire Safety (Wales) Measure 2011

Consultation Response Form

Your name: Steven Mills

Organisation (if applicable): Secretary/ National Fire Sprinkler Network

email / telephone number:

Your address:

Chapter 2 Proposed approach

Question 1: Do you agree with the proposed approach (set out in paragraph 20) of implementing the Measure through commencing section 1 of the Measure and through making required changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Question 2: Do you agree with the proposed list of residences (set out in paragraphs 28 and 31) to which the regulations should apply?

Yes ☒
No ☐
Comments:

Chapter 3 Design, testing and installation of residential fire suppression systems

Question 3: Do you agree that the guidance should refer to BS 9251 as the main standard by which the regulatory requirement can be met?

Yes ☒
No ☐
Comments:
BS9251 has been proven to provide a high standard of cover for domestic and residential properties where people reside. Incidents notified to the NFSN suggest a high level of reliability for BS 9251 sprinkler systems connected to the water mains distribution system and good operational effectiveness in fire situations.

Question 4: Do you agree that the guidance should retain the flexibility to refer to other fire suppression systems when such systems achieve a British Standard?

Yes ☒
No ☐
Comments: The NFSN would agree that there will be other water based suppression systems which can provide levels of protection similar to that with BS9251. It is important that any systems employed meet the requirements of a suitable British Standard if they are installed under a requirement to meet Building Regulations.

Chapter 4 Maintenance of residential fire suppression systems

Question 5: Do you agree with the proposal not to regulate to require the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: The maintenance of installed systems is of great importance to their ongoing capability but I feel the main way in which to ensure that suitable maintenance is done is by educating end users of the importance of taking such measures and assisting them to take a personal interest (ownership) and regularly monitor 'their' installation. The NFSN believes that if owners are given the relevant information, then a majority should be capable of ensuring their systems remain at operational readiness.

Question 6: Do you agree with the proposal to produce a householder's guide to encourage the maintenance of fire suppression systems?

Yes ☒
No ☐
Comments: See above

Chapter 5 Commencement

Question 7: Do you agree with the proposed approach to commencing the changes to the Building Regulations?

Yes ☒
No ☐
Comments:

Chapter 6 Industry Competence and Training

Question 8: Do you agree that the suite of National Occupational Standards covering Mechanical Fire Protection[48] remain relevant given the proposals covered by the new legislation?

Yes ☒
No ☐
Comments: The NFSN feels that it will be important to have fully trained installation personnel in order to ensure the highest quality of installation. The NOS as outlined are vitally important in helping to achieve this goal.

Question 9: Do you agree that existing sources of training will remain fit for purpose when the new legislation is implemented?

Yes ☒
No ☐
Comments: The NFSN envisages that there may be a need for approved training centres to cover Central and North Wales in order to give greater access to those wishing to engage in sprinkler installation work. Those existing sources will need to be supplemented by providers in these other regions,

Part 2 Proposed amendments to Approved Documents

Question 10: Do you agree with the proposed changes to the Approved Documents?

Yes ☒
No ☐
Comments:

Part 3 Regulatory Impact Analysis & Cost Benefit Analysis

Question 11: Do you agree that the cost benefit analysis is a reasonable estimation of the estimated costs and benefits of the proposed regulations?

Yes ☐
No ☒
Comments: The NFSN believes that the costs to the community and NHS of fire deaths and injuries is higher than that currently shown in calculations and would mirror more closely those shown in research from other countries such as the USA.
The NFSN also would also point out that water supply connection costs are critical to the cost benefit analysis and these should be made as straightforward as possible. Connection costs from some other UK water providers are significantly less than the preferred option stated by Welsh Water.

[48] The suite of NOS for Mechanical Fire Protection is available at: http://www.skillsforsecurity.org.uk//download.php?fileid=493

The CFOA commissioned cost benefit analysis undertaken by BRE and published in March 2012 (BRE No 264227 rev 1.1) is a much more considered and balanced report and should be included as evidence of the findings.

Question 12: Do you agree that the Regulatory Impact Assessment has correctly identified the main risks and issues associated with the proposed regulations?

Yes ☐
No ☒
Comments: The Regulatory Impact Risk Assessment used takes no account of the Impact which the Regulations will have on existing dwellings, and the take up of retrofit sprinklers as a consequence, once society becomes aware of the benefits as a result of growing evidence.
See also reference to CFOA commissioned report in 11 above

Question 13: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

The NFSN believes that the most operationally effective and economical way to provide water for sprinkler systems in dwellings is to provide a single supply pipe to the premises from the water mains and tee off (unmetered) to the sprinkler system near to the dwelling. This will also reduce the likelihood of leakage from the water supply system. Stored water and pumps should only be used where this option is impossible as this will drive up the costs of installation and not enhance reliability due to the possibility of interrupted power supply and the increased maintenance required.
The NFSN believes that water regulations should be amended to classify water used in domestic and residential sprinkler systems as 'water for fire-fighting'. This would then negate the need for meters to be fitted on most systems.
The NFSN believes that the experience from other countries such as the USA shows that home builders are not necessarily adversely affected by requirements to fit sprinklers into homes and that in fact those that do embrace the fitting of sprinklers see an increased turnover. Not only this but home owners and occupiers have been seen to welcome the fitting of sprinklers into their homes. A survey of home owners in Studley Green in Wiltshire showed that a majority of occupiers welcomed the fitting of sprinklers. (report can be provided if required)