

Housing, Finance and Regeneration Policy and Scrutiny Committee

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Title:	Fire Safety in New Developments and Current Housing Stock
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Fire Safety in new developments

This note aims to inform the committee regarding the measures currently being taken and measures currently under consideration in respect of promoting fire safety in new developments.

1. Introduction

Although Grenfell Tower was an existing, refurbished block there are many lessons that can be applied to our new developments. WCC's Employers Requirements have always called for a high standard of fire protection to be incorporated into the design and construction, but they have been enhanced following the immediate recommendations of the Hackitt Inquiry and will continue to be enhanced as new considerations emerge.

This report focuses on our new buildings; the development team are currently to track to delivery 1850 new affordable homes by 2023, and it is anticipated that a similar quantity of new homes will be delivered between 2023 and 2028. The WCC development programme also includes ?? private-sale homes. WCC's approach to fire safety in new buildings takes no account of tenure type, the fire safety measures incorporated into each building are entirely based upon the buildings location, configuration and levels & type of occupancy.

In general, the construction and housing industries are anticipating significant changes to the building regulations in terms of design requirements and the processes and protocol's for approval. The development team have worked with external experts to anticipate the requirements and incorporate the necessary changes. Whereas the tragedy at Grenfell has been a catalyst for the industry-wide review of fire safety, the development team have endeavoured to take a wider view of fire safety rather than just focus on the key headlines of the report by Dame Judith Hackitt.

This briefing will focus on changes key building components as well as the management of the design, and the management of the building once it is inhabited (in-use).

2. Key Building Components

The key building components are divided into two key areas: building fabric and building services, each of these areas play important roles in delivering safe buildings.

2.1 Building Fabric

The primary consideration when designing a safe building is the fabric of the building; careful design of the fabric will minimise the opportunity for fires to start and will restrict the fire's ability to spread. The key elements of the fabric are the internal walls, external walls, doors, windows and service routes.

External Walls

We have changed our Employer's Requirements documents to ensure that combustible materials are not included in the composition of the external walls, irrespective of the height of the building. Because the non-combustible materials are generally heavier and bulkier, this has required significant redesign of a number of buildings that were already in an advanced stage of design or construction (such as Dudley House, Parsons North, Cosway Street and Ashbridge Street). Structures have been updated to account for the increased weight, in some cases minor amendments to the planning consent have been sought, to account for the slight increase in the size of the building.

It should be noted that the infill schemes at Melrose & Keith, Ordnance Mews and Helmsdale House, contain foam insulation. The insulation is an integral part of the building's structural system and could not be omitted, however steps have been taken to ensure that the insulation is fully encapsulated within non-flammable materials (masonry and concrete panels externally, and fire-rated plasterboard internally), in addition these properties all benefit from sprinkler protection.

Internal Walls

The internal walls are constructed in accordance with the requirements of building regulations, with fire resisting compartments constructed to suit the fire strategy. Where services penetrate fire compartment walls, they are "fire stopped" as appropriate, WCC require the Main Contractor to run a stand-alone Quality Assurance process for the fire stopping element of the project.

Doors

All front doors are FD30s compliant, they are supplied as part of a certified door set, any glazing such as fan lights or side panels is required to be fire rated glass.

2.2 Building Services

Sprinklers

Sprinklers are included in all new multi-occupancy developments irrespective of the height of the building. Concealed sprinkler heads and pipework are installed into each dwelling.

Dry Risers

Dry Risers are installed in accordance with building regulations and Fire Officer requirements.

Automatic Detection and Alarms

All new blocks require a LD2 level of fire alarm system; this means that all communal areas are covered by manual “break-glass” call points, as well as automatic mains-powered smoke detectors. All dwellings have mains-powered automatic smoke detectors in each room where a fire may start (excludes kitchens and bathrooms).

The call-points and smoke detectors in the communal areas are connected to AOVs (Automatic Opening Vents) in the communal areas, which assist in clearance of smoke, thus providing a safer escape route for residents and a safe working environment for firefighters.

The communal fire alarm system interfaces with the building’s management systems, to allow for automatic dial-out to the emergency services in the event of activation. The fire alarm also interfaces with the lifts to ensure that the lifts return to ground floor and inoperable thereafter in the event of a fire.

We are currently reviewing the viability of installing a “repeater panel” to the ground floor of every building. The panel will allow the firefighters to identify the source of the alarm upon arrival at the building.

We are currently reviewing the viability of installing a Fire Brigade-operated evacuation alarm system. Currently the only way for the fire brigade to notify residents of the need to evacuate, would be for them to knock on every door. This system would enable firefighters to make an assessment upon arrival at the scene and trigger a sounder in every dwelling to alert residents of the need to evacuate.

Emergency Lighting and Signage

All communal areas are covered by mains-powered, battery backed emergency light fittings, with illuminated escape signage at key locations. Floor / Level Numbers will be displayed on photoluminescent boards on each landing.

We are currently reviewing the viability of installing photoluminescent strips to the stair nosings in communal areas, and also the installation of low-level photoluminescent dwelling number signs.

Lifts

A firefighting lift is installed in all dwellings over 18m tall.

3. Building and Design Management

BIM (Building Information Modelling)

The Hackitt report identified major issues with the way in which technical design information for buildings is stored and updated, the report made recommendations for the wider adoption of BIM. All of WCC's new build developments are already designed using BIM, the development team have established robust protocols for the external designers and contractors to follow when designing and constructing new buildings.

BIM allows designers to work collaboratively to produce information using a 3d model, there are numerous benefits in terms of the accuracy of design and programme. The BIM model stays "live" throughout the lifespan of the building, all of the key components are tagged with information regarding provenance, composition, warranties and required maintenance.

The next challenge is to procure a data environment, to store and effectively communicate the as-built information. The common data environment will be a central repository for all building models which will be accessed and updated by anyone undertaking works to the building during its lifetime. The development team are in the early stages of this procurement currently.

Home User Guides

All residents of the new homes are issued with a Home User Guide, the home user guide includes information on the life safety systems in the building and how to use them, the fire strategy, advice on prevention of fires and clear instructions regarding what to do in an emergency. The Home User Guide is discussed with every resident as part of the hand over.

Handover from Development to Housing

The development team work closely with the Westminster Housing Services to ensure that the buildings are handed-over properly; ensuring that the in-use officers are fully appraised in respect of the safe operation and maintenance of the new buildings. The volume of new properties being delivered is rapidly increasing each year, and the process for handing-over develops as lessons are learned from each project.

Next Steps

In the absence of new legislation and guidance from central government, and in the face of varying advice from industry we believe that the current processes and designs provide Westminster residents with safe and secure buildings.

The Employer's Requirements (ER's) are currently being rewritten and will incorporate the measures scheduled above*. The ER's will be revisited to account for any new legislation that arises, but in the interim the Development Team will continue to review industry advice and liaise with peers in respect of emerging best practice.

* Excludes items currently noted above as "under review": repeater panel, evacuation system, photoluminescent stair nosings

Fire Safety in current social housing stock

4. Fire doors

Following the last P&S committee good progress has been made to many of the recommendations. Below is a summary on progress and other issues relating to fire doors

Front entrance fire door regulation	A front door regulation criterion has been defined as per the British Standards and this is captured by the comprehensive fire door inspection regime which is in place. Major works has included this on a scheme by scheme basis from November 2019
Recording the inspection of front entrance fire doors in tall buildings	This is in place and is completed on a monthly basis
Major works inspections of front entrance fire doors (both tenants and leaseholders).	This is now included within all major works client briefs
Data and reports on fire safety matters	Monthly fire statistics are reported on a monthly basis to Health & Safety committee which are reported quarterly to the Cabinet Member and will be incorporated in dashboard to A&P.
Number of staff who can be trained as fire inspectors	14 staff are progressing through the Fire Door Inspection Programme, similar to 2018-19
Timeline for all fire doors to be inspected.	
Lobby for appropriate bodies to dedicate resources to support local authority building owners to train the staff and carry out the inspections in accordance with the London Fire Brigade's expectations.	Ongoing

In addition, the Director of Housing has put in place a more formal reporting structure, by establishing a monthly Health & Safety committee, fire prevention forms an important part of this agenda.

Below this committee, the Divisional Head of Property has created a monthly Fire Working Group where all aspects of fire prevention, including tracking the completion of

FRA's, ensuring that these are transferred into completed works e.g. inclusion on work programmes, raising of repairs.

Some of these programmes will take several years to complete e.g. fire door programme, and therefore will be included within a comprehensive programme to be developed to ensure that all these works can be done in a timely manner.

5. Sprinklers

The task group agreed the following recommendations in relation to sprinklers

Install sprinklers in all properties regardless of tenure, seeking to recover costs from post-1987 lessees only. (option A)	This work has commenced. We have installed a full sprinkler system to Glastonbury House
Work to establish a legal agreement for the right of access in to lessee properties and for charging post-1987 lessees	Currently being reviewed.
Carry out section 20 consultation for post-1987 lessees and then undertake the installation of the system to a block, deferring demanding the service charge until completion.	Our Media team is undertaking online surveys with leaseholders regarding the installation of sprinklers – results are pending.
Installation of option 1 (Boxed in plastic pipework with concealed heads) sprinklers	As part of the above Leaseholder are being asked on the aesthetics of sprinklers
Work with the London Fire and Emergency Planning Authority and key industry bodies to develop a comprehensive programme of ongoing dialogue and communication with all leaseholders to obtain access to their properties and to document all such individual engagements.	In Progress
Prioritise sheltered housing over tall buildings and establish budget for doing so within the HRA business plan	We prioritised Glastonbury House, and we are reviewing Glarus Court.
Ensure comprehensive records of fire safety works on each property are kept, including work and inspections undertaken by others	Records are kept, we are intending to transfer all records onto a central database – SHINE. This will commence February 2020 and will

such as the fire brigade, as per the recommendations of the Hackitt report.	provide a comprehensive and user-friendly database across the directorate.
Communicate advantages of sprinklers to private freeholders of tall buildings and to maintain a record of all such communications.	
Lobby Government (through LGA and London Councils were appropriate) on funding for the retrofitting of sprinklers, especially in cases where the Housing Revenue Account is having to fund such works.	This is being done via the monthly Housing Director Fire Safety meetings.
Lobby the government to amend regulations ensure retrofitting sprinklers is easier for social landlords.	
Continue to lobby the Mayor of London so that LFEPA provide specific guidance on the installation of sprinklers to mixed tenure blocks, specifically where leaseholders are able to decide (as is currently their right) whether or not to allow access to their properties for works to be done and to be maintained in the future. Also, lobby government for any changes that can be made to regulations to permit the council to enter (by appointment) such properties to carry out the works.	

Fire Safety in temporary accommodation

6. Fire risk assessments and spot checks

Temporary Accommodation (TA) comprises two forms of accommodation. Emergency accommodation (called stage 1), for use whilst a household's homeless application is being assessed. Secondly, there is longer-term, (stage 2) accommodation. This accommodation is for households where the council has accepted a housing duty to them and is provided until suitable longer-term accommodation is available.

WCC ensure that all properties secured for vulnerable people to use as temporary accommodation meet a suitable and safe property standard. WCC acquisition of properties for the purpose of TA requires all surveys to include a fire risk assessment as part of the condition survey of the property.

Providers of TA are required through contracts to meet suitable and safe property standards. WCC operate an annual inspections regime. All inspections include a fire risk assessment and the Housing Solutions Service engage their own environmental health consultant to inspect and review the conditions of all emergency (stage 1) accommodation.

WCC Housing Supply team also complete spot checks and inspections of TA accommodation to ensure that consideration is given to potential risks and hazards to health and safety. These officers have been trained to the national Health & Safety Standards for Rented Homes (HHSRS). Officers of this team inspect accommodation leased from private landlords.

7. Cladding

WCC have completed a review of TA accommodation that has ACM cladding. Of the 32 providers who work with WCC, none identified ACM cladding on any of the TA accommodation we use. One provider highlighted 6 units that have cladding of a different specification to ACM. We are currently reviewing the specification detail of this product with officers in WCC asset team.

8. Setting the standard

WCC are about to start work with the pan-London programme 'Setting the Standard' (STS) to develop a London wide standard in Stage 1 accommodation across all local authorities. The STS programme is scheduled to go live during 2020 and requires an annual Housing Health and Safety Rating System inspection of all accommodation and includes;

- Developing a centralised pan-London inspection service to guarantee that inspections of accommodation are carried out annually and that the records are uploaded to the web-based referencing system. Satisfactory properties would maintain their status on the STS list and properties requiring works withdrawn and referred to the host borough for enforcement action.
- Create a central team of Inspectors overseen by qualified environmental health practitioners who would be dedicated to the task of inspecting and rating of nightly paid B&B and studio accommodation used by all London Boroughs.

Fire Safety in private sector housing

9. Building Safety Programme

- Following Grenfell and in response to Central Government's Building Safety Programme, work has been undertaken to inspect and assess privately-owned

residential high-rise buildings with unsafe ACM (Aluminum Composite Material) cladding across the City. Since identification of affected buildings, officers have been closely engaged with relevant parties, including building owners and leaseholders, to bring about any necessary remediation. This work has included inspections and obtaining certain information regarding building construction and fire risk assessment.

- This work has identified 13 high-rise, privately-owned buildings providing residential accommodation in Westminster which have hazardous cladding. It is important to note that interim fire safety measures which meet LFB approval are in place in these buildings pending full remediation. Officers have been fully engaged with the building owners and relevant partners to secure remediation. This has resulted in one building being fully remediated, and substantial remediation of three further buildings with completion expected shortly.
- Following consultation with LFB and our Building Control department, enforcement action has now commenced under the Housing Act 2004 through the service of Hazard Awareness Notices on building owners. These notices have provided building owners with a 3-month window in which to provide details of how any hazardous cladding is to be removed and replaced.
- Pre-enforcement notification letters were sent to affected leaseholders two weeks prior to this, which provided them with a range of advice and support on this issue. This included a new section on the Council's website to provide further information and a dedicated mailbox to answer any specific queries. This exercise has proved very successful in minimizing queries from affected parties.
- Responses by building owners to the Hazard Awareness Notices will be reviewed and consideration will be given to the need for any escalation of enforcement action with the expiry of the Hazard Awareness Notices this month.
- Officers have encouraged building owners to apply to the Government's Private Sector Remediation Fund to assist with funding necessary works. This has resulted in all bar one of the owners of buildings with hazardous cladding submitting applications for funding. The remaining building has received confirmation that remedial works will be funded through insurance arrangements.
- In addition, MHCLG issued a request to local authorities across the country to undertake a data collection exercise regarding high rise residential buildings in their area towards the end of 2019. Westminster contains one of the highest number of such buildings nationally, and work has commenced to undertake this exercise. This work has attracted funding from the MHCLG in accordance with New Burdens rules

10. Housing Standards Task Force

- The Housing Standards Taskforce continues to enforce against rogue landlords and agents. In the current financial year, we have issued 15 Civil Penalty notices and have collected £61,500 in penalty charges. There is an appeal pending at

the First Tier Tribunal in respect of a £20,000 penalty for the operation of an unlicensed House in Multiple Occupation (HMO) property in Shirland Road.

- Not all cases are prosecuted and where the landlord is cooperative the Council, at its discretion, may decide to take less formal action. In one case in Third Avenue, a student house was found to be unlicensed and following intervention by the HST, the owner (who was not a portfolio landlord) quickly licensed the property, installed a new fire alarm and had the electrics overhauled. Taskforce action has resulted in the discovery of 20 unknown and unlicensed HMOs in the current year.
- The Metastreet report into Houses in Multiple Occupation (compiled with data from the HST analysts) has now been finalised and shows clear correlation between Houses in Multiple Occupation and housing hazards, particularly those relating to fire safety and excess cold hazards. The results of this analysis will form part of the background documentation for the proposed Additional HMO licensing scheme, which will come before members shortly.
- External funding for the Housing Standards Taskforce finishes in March 2020. The team are looking to secure further funding from the Community Infrastructure Levy/Section 106 planning contributions as a means of continuing the project beyond March.

Short Term Lets (STL)

- A meeting was had with the CEO of AirBnB and the STAA (Short Term Accommodation Association) on how the sector could be better regulated, the proposal from the company being a voluntary registration system that could be implemented locally. The City Council would rather a statutory registration scheme but welcome any further steps by the sector.
- AirBnB would like us to consider a joint communications campaign to provide information for hosts, and to work together to develop case studies to inform a proposed AirBnB white paper to Government. That work is ongoing.
- Since 2015, there have been 1987 STL cases, and there are currently 1406 active cases. To date, 482 of those cases have related to Planning Contravention Notices and 24 related to enforcement notices. There have been 166 cases to do with noise, 18 related to anti-social behaviour and 208 cases on waste related STL.