



Housing Scrutiny Committee

Task Group on Fire Safety of Low-Rise Domestic Properties

January 2018

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1. THE CHAIR'S FOREWORD

Fire has featured prominently in the news in 2017, in the UK and throughout the world. From arson attacks which have resulted in deaths, fires on industrial estates requiring road closures and evacuation of local residents, the fatal fire at Grenfell Tower, forest fires in Portugal and the USA and concluding with the fire in the multi-storey car park in Liverpool. One feature is that they make the news and are then pushed down the news agenda. For example after the Grenfell Tower the Summer edition of the Brent magazine had a three-page article on fire safety and a news item on £10 million for fire safety works in council-owned tower blocks. However the Winter edition had no mention of fire safety in its 56 pages.

Following Grenfell Tower several Government enquiries and the public inquest have been established to look into the cause and aftermath, with a separate enquiry into building regulations. But the scene is forever shifting. After the Liverpool multi-storey car park fire there will need to be a review of safety measures in car parks beneath residential and office blocks.

The focus after Grenfell Tower has been on fire safety in tower blocks. But most people do not live in a tower block and most people do not live in council housing. Brent is predominantly low-rise properties, eg semi-detached and terraced housing, ie street properties. The last major fatal fire in Brent was at a privately rented semi-detached property in Sonia Gardens in Neasden.

In light of the pertinence of this issue at hand and the extensive work by Brent Council on improving fire safety for high-rise properties, this task group set out to examine fire safety measures for all low-rise properties under all landlords and in private ownership, where most fire incidences and deaths occur. The evidence of fire incidences by property type highlights the majority of fire events occur in low rise properties. This is a combination of houses, converted and purpose built maisonettes where 61-74% of fires occurred each year between 2014/15 - 2016/17 compared to 1-5% for high-rise purpose-built flats or maisonettes in the same period.

My interest in fire safety began when I was a member of the London Fire and Civil Defence Authority (LFCDA) and its successor body, London Fire and Emergency Planning Authority. As a borough representative on the LFCDA I was notified of all fire deaths in Brent. Although over 15 years ago some still remain with me, particularly the death in the sheltered housing scheme and the death in a Money Shop, both in Wembley. Later, as a councillor for Dudden Hill ward, I remember the fatal fire in Sonia Gardens. So I am aware that fires can occur in any type of property, not just high rise properties. And everyone is responsible for fire safety, tenants, landlords and owner-occupiers.

I also learnt the importance of smoke detectors. I still have an old-fashioned battery operated smoke alarm but I regularly test it once a month. And I change its battery once a year, whether it needs it or not. It is my birthday present to myself. I thank the members of the task group for their work, and others who informed and contributed to the findings of this report.

Cllr Janice Long
Task Group Chair

2. TASK GROUP MEMBERS



Chair: Cllr Janice Long



**Cllr Shafique
Choudhary**



Cllr John Duffy



**Cllr Patricia
Harrison**



Cllr Jean Hossain

3. EXECUTIVE SUMMARY

Following the fatal fire at Grenfell Tower in June 2017 there has been significant focus by different levels of government on the fire safety of domestic properties across the country. Nationally, this includes the Department for Communities and Local Government's Building Safety Programme, a public inquiry into the circumstances of the fire, and the Independent Review of Building Regulations and Fire Safety. In Brent, the council has published its fire risk assessments (FRAs) for council properties, and updated the 2017-18 housing works programme to include fire safety measures for tower blocks. The council has further agreed for £10 million to be spent on a package of enhanced fire safety measures for high rise blocks, and undertaken a number of other measures.

However, the majority of fire events occur in low rise properties, and so the task group felt there was a compelling case to investigate fire safety measures for these in addition to high rise blocks. It set out to examine fire safety measures for council housing and social housing managed by registered providers (RPs), as well as how they communicate with their tenants and leaseholders in respect of these issues. The group also looked at housing allocations policy, the risks posed by bulky items in common areas, and emergency vehicle access for social housing estates.

Social landlords have completed FRAs for all high rise blocks (18m and above) apart from street properties. The council has published its assessments online, and the RPs who met the group had mostly completed their FRAs, with the remaining few to be completed by March 2018. However, this is inconsistent amongst landlords and amongst types of property. The task group believes that all residents should benefit from the information and reassurance provided by making these assessments publicly available.

Evidence considered by the task group indicates that licensing for landlords has raised safety standards, and it concluded that it is of the greatest importance that the council does everything it can to raise awareness of landlords' obligations under this scheme amongst tenants.

A personal emergency plan exists for each vulnerable person, and the local fire brigade is provided notification of their location and vulnerability. The task group felt that it was important for this information to be regularly updated.

Bulky items stored in communal areas can pose a fire risk, or an obstruction to escape in the event of a fire. However, the task group was concerned that some landlords may not be proactive in their attitudes towards clearing these. It also recognised that storage space is an important factor in this regard, particularly for vulnerable residents who may rely on bulky equipment.

The issue of illegal parking in locations meant for the use of emergency vehicles was identified by members as an important area of focus. The necessary markings and signage to prohibit parking in these locations are often incomplete or unclear, and require immediate attention from the council and RPs to ensure high standards in safety for all Brent residents. Current parking enforcement also has limitations. Data reviewed by the task group demonstrates that better communication is required to inform residents where they should not park, and stronger policies and practice to deter them from doing so - particularly when this can impede the emergency services.

The task group also found anecdotal evidence that levels of awareness of basic fire safety are far from where they should be, and this remains a continuous challenge which requires further effort to address.

Recommendations

Recommendation 1: The council and registered providers in Brent should publish the latest Fire Risk Assessments for all of their properties on an ongoing basis.

Recommendation 2: In wards where the landlord licensing scheme is in force, the council should continue work to raise tenants' awareness of it (and more widely if it is expanded beyond these wards). It should also publish a "plain English" guide for tenants on landlords' obligations under the scheme.

Recommendation 3: The council should better publicise the existing systems for residents to anonymously report non-compliant landlords under the landlord licence scheme.

Recommendation 4: The council and registered providers should work with care providers to ensure that the London Fire Brigade has up-to-date information about vulnerable tenants and leaseholders.

Recommendation 5: The council and registered providers should review the appropriateness of fire detection systems in properties based on the specific needs of their tenants and leaseholders.

Recommendation 6: All landlords should take a "zero tolerance" approach to bulky items kept in common areas.

Recommendation 7: All social landlords should provide storage space for bulky items for all property types and sizes.

Recommendation 8: The council should continue to develop plans and seek funding for secure bicycle storage units across the borough.

Recommendation 9: The council and registered providers should act to reduce unauthorised parking in areas for the use of emergency services, including:

- clearer and better maintained signage and markings to identify those areas permitted for car parking, and all those areas which are to be kept clear
- improving awareness of traffic and parking rules, and
- stronger enforcement of parking rules.

Recommendation 10: The council and registered providers should regularly use their communication channels to inform and raise the awareness of residents in relation to fire safety.

Recommendation 11: The council and registered providers should provide, in the main entrance of all types of property, floor plans identifying the location of fire exits, and clearly and simply explaining what to do in case of a fire.

4. BACKGROUND

National Context

Following the fatal fire at Grenfell Tower in June 2017 there has been significant focus by local and central government on the fire safety of domestic properties across the country. The Department for Communities and Local Government (DCLG) established the Building Safety Programme in July to identify buildings which are of concern through a thorough checking and testing process.

The Prime Minister also announced a public inquiry into the circumstances of the fire, and the findings of this inquiry will have a significant impact on fire safety measures and practice when these are reported. Based on the terms of reference issued for the inquiry it is likely that building regulations, fire regulations and other legislation will be subject to reform, as well as guidance and industry practice relating to the design, construction, equipping and management of high-rise residential buildings.

There is also an Independent Review of Building Regulations and Fire Safety, which will report to the Government in Spring 2018, considering the current regulatory system for planning, design, construction, maintenance, refurbishment and change management; as well as the roles of key individuals within the system in ensuring that fire safety standards are met.

Brent Context

Brent experienced a dramatic shift in the tenure of households between 2001 and 2011 with a decrease in owner-occupation from 56% to 44% of the borough's households. Meanwhile, the proportion of private rented households nearly doubled to 32%, and the proportion of social rented households held steady at 24%.¹

The council's annual programme of Fire Risk Assessments (FRAs) for council properties was completed between March-May 2017 and can be found on the Brent website.² The actions resulting from the FRAs were mainly responsive repairs (eg replacing a damaged flat door); compliance checks on installations (eg boilers and self-closing mechanisms on doors) and staff training issues (eg fire safety awareness and the use of fire extinguishers).

The council has updated the 2017-18 housing works programme to include fire safety measures for tower blocks following the Grenfell Tower fire. On 10th July 2017 the council further agreed for £10 million to be spent on a package of enhanced fire safety measures for high rise blocks such as sprinklers, smoke detectors and fire alarms. Council officers developed a fully itemised and costed programme of fire safety work, outlining the enhanced fire detection equipment that could be installed, over and above the required standard.

Along with increasing funding, the council has undertaken a number of measures to inspect smoke detectors for council properties, improve awareness of the mitigation measures in place for civil emergencies; and also improve awareness of fire risks, including hosting local meetings between July and October 2017.

The evidence of fire incidents by property type in Table 1 highlights that the majority of fire events occur in low rise properties. This is a combination of houses, converted and purpose built maisonettes where 61-74% of fires occurred each year between 2014/15 and 2016/17. In the same period, properties with 10 or more storeys saw only 1-5% of fires.

¹ 'The 2011 Census: A Profile of Brent', Brent Council, 2013;

² <https://www.brent.gov.uk/services-for-residents/housing/fire-safety-in-brent/>

For this reason, the task group felt there was a compelling case to investigate fire safety measures for low-rise domestic properties in addition to high rise blocks. It set out to examine fire safety measures for council housing and social housing managed by registered providers (RPs), as well as how they communicate with their tenants and leaseholders in respect of these issues.

Along with the above, the group also wanted to look at housing allocations policy, and how this takes into account residents' ability to respond to fire and other emergency incidents; the risks posed by bulky items (such as buggies and bicycles) in common areas, and the impact of storage space on these risks; and emergency vehicle access for social housing estates, and how parking enforcement could help ensure and improve this.

Table 1: Evidence of fire incidents by property type			2014/15		2015/16		2016/17	
Property Class	Property Type	Detailed Property Type	Fires	Fire	Fires	Fire	Fires	Fire
				Deaths		Deaths		Deaths
Dwelling	Converted Flats/Maisonettes	Converted Flat/Maisonette - Up to 2 storeys	43		40		26	1
		Converted Flat/Maisonettes - 3 or more storeys	6		11		16	
	Dwelling	House - single occupancy	85		85	1	77	
		Self-contained Sheltered Housing	9		7		11	
		Other Dwelling	1					
		Caravan/Mobile home (permanent dwelling)	1					
	House in Multiple Occupation	Licensed House in Multiple Occupation - Up to 2 storeys	2		3		3	
		House in Multiple Occupation - Up to 2 storeys (not known if licensed)	4		2		2	
		Licensed House in Multiple Occupation - 3 or more storeys	1		5		1	
		Unlicensed House in Multiple Occupation - Up to 2 storeys	3				4	
		House in Multiple Occupation - 3 or more storeys (not known if licensed)	2		3			
		Unlicensed House in Multiple Occupation - 3 or more storeys	1				1	
	Purpose Built Flats/Maisonettes	Purpose Built Flats/Maisonettes - Up to 3 storeys	44		55		49	
		Purpose Built Flats/Maisonettes - 4 to 9 storeys	19		18		32	
		Purpose Built Flats/Maisonettes - 10 or more storeys	6		3		12	
Other Residential	Other Residential	Other Residential Home	2		3		3	
		Hostel (e.g. for homeless people)	3				3	

		Student Hall of Residence	2				1	
		Hotel/motel	1				1	
		Nurses'/Doctors' accommodation	1		1			
		Youth hostel	1					
		Boarding House/B&B for homeless/asylum seekers			1			
		Boarding House/B&B other	1					
		Sheltered Housing : not self-contained	1					
	Residential Home	Retirement/Old Persons Home	2		4		3	
		Nursing/Care Home/Hospice	3		2	1	3	
		Children's Home						
Grand Total			244	0	243	2	248	1

Source: London Fire Brigade, July 2017

5. METHODOLOGY

As part of this review the task group invited relevant partners to contribute through discussion groups, meetings and visits. Evidence-gathering included interviews with officers from Brent Council, Housing Associations and London Fire Brigade, as well as secondary quantitative data collated from experts.

The task group organised three meetings with officers from Brent Council, Housing Associations and London Fire Brigade:

Date	Stakeholder
27 Oct 2017	<ul style="list-style-type: none">• Mark Davidson, London Fire Brigade (Brent)
13 Nov 2017	<ul style="list-style-type: none">• Laurence Coaker, Head of Housing Needs, Brent Council• Sean Gallagher, Head of Service - Housing Management Property, Brent Council• Troy Francis, Head of Service - Housing Management Customer Services, Brent Council• Spencer Randolph, Head of Private Housing Services, Brent Council• John Flynn, Team Manager – Major Projects, Brent Council• Lavdrim Krashi, Service Manager – Accommodation Services, Brent Council• Mark Austin, Wing Parking
15 Nov 2017	<ul style="list-style-type: none">• Wayne Davies, Director of Asset Management, Catalyst• Paul Eccles, Catalyst• Suraj Shah, Head of Strategic Asset Management, Network Homes• Grahame Hines, CEO, Octavia• Lewis Lowe, Octavia• Geeta Le Tissier, External Contracts Manager, Brent Council

6. KEY FINDINGS AND RECOMMENDATIONS

Social landlords referred to here include Brent Council and the three registered providers (RPs) that attended task group meetings (Catalyst Homes, Network Homes and Octavia).

There has been much activity to review fire safety in the wake of the Grenfell Tower fire. Given the public inquiry and independent review mentioned above, the task group decided that it would be better to focus its attention on other areas not covered by their remits, so as to make the best use of its capacity.

The Government's Building Safety Programme mentioned above is identifying high rise buildings with Aluminium Composite Material (ACM) cladding (ie the same cladding used for Grenfell Tower, which led to the intensity of the fire). For those blocks where this is the case, landlords mentioned that they have taken appropriate measures of appointing wardens to oversee the properties 24 hours per day, until definitive solutions are identified. The cladding is being tested, and where necessary measures are being taken to replace the cladding with an adequate alternative material.

Social landlords told the task group that the need for urgent fire safety works warranted immediate activity without the usual statutory consultation with leaseholders. Their position was that these works can be scrutinised by member and resident panels in the future. They have, however, have been quick to develop a communication strategy to inform residents through printed material and public meetings on fire safety, prevention and mitigation in the case of a fire event. Landlords are also developing training for their staff based on observation of the usage of the property and interaction with residents.

Social landlords have completed Type 1 FRAs for all high rise blocks (18m and above) apart from street properties. These FRAs are for common parts of the block only, and non-destructive in their testing method. Brent Council has published its assessments online, however to ensure higher levels of safety and provide reassurance to residents, it plans to undertake Type 4 assessments (ie including flats, and using destructive testing methods) for all blocks in two phases from November 2017 to March 2019, which will test the strength of compartmentation. This involves the division of a building into cells, using construction materials that will prevent the passage of fire from one cell to another for a given period of time, and is widely agreed as the most effective fire safety measure.

The task group was told that future Type 1 FRAs by the council will take into consideration residents' behaviour, in relation to issues such as the removal of bulky items, testing fire alarms at home and creating networks between residents regardless of tenure type. This will require further resident consultation to ensure ownership of any new processes, instruments and schemes for fire safety.

The RPs who met the group had mostly completed their FRAs, and the remaining few would be completed by March 2018. Catalyst have published their fire action notices and street properties have new fire and heat alarms. In the wake of the Grenfell Fire, social landlords also have placed their street properties and Houses of Multiple Occupation (HMO) on full evacuation notices during a fire event. Caretakers monitor fire safety doors in common areas, and rise areas are kept clear (though some schemes have permanent caretakers while others are overseen by cleaning staff).

Network Homes have completed Types 1 and 4 FRAs for all buildings. Where front and fire doors in common areas were found to be inadequate, most of the RPs agreed to replace them free of charge for leaseholders. Properties found to have compartmentation weaknesses had

fire drill policies and fire wardens in-place. Further fire safety training was undertaken for staff with an attempt to shift the culture of the organisation towards fire safety for all RPs.

Positively, few high rise structures have been found to have many anomalies from the FRAs. While it is encouraging that FRAs and actions resulting from these are being made publicly available, this is inconsistent amongst landlords and amongst types of property. The task group believes that all residents should benefit from the information and reassurance provided by these assessments.

Recommendation 1: The council and registered providers in Brent should publish the latest Fire Risk Assessments for all of their properties on an ongoing basis.

Fire Prevention

It was accepted by all who gave evidence to the group that landlords are ultimately responsible for fire safety. The London Fire Brigade (LFB) has a limited role in risk assessment, however, and has the power to shut down properties with a prohibition notice (under Article 31 Regulatory Reform (Fire Safety) Order 2005). This is issued where the use of the premises may constitute an imminent risk of death or serious injury to the persons using them. This may be a restriction of use, for example imposing a maximum number of persons allowed in the premises, or a prohibition of a specific use of all or part of the premises, for example prohibiting the use of particular floors or rooms for sleeping accommodation.

Any building over 18 metres in height is required by law to have fire proof lifts, which are contained within a concrete block with an independent power supply. However, the LFB discourages the use of lifts during a fire event.

The Borough Commander told the task group that he believed licensing for landlords has raised safety standards for properties where the landlords had obtained licenses, while unlicensed properties were felt to have lower safety standards. There have been a number of incidents across Brent of unscrupulous private sector landlords who have let substandard properties, and other councillors identified to the task group, in informal conversations, properties across Brent where they believe the extension of licensing for landlords would be useful, as well as highlighting the need to improve uptake in areas where it is already in force.

For these reasons, the task group feels that it is of the greatest importance that the council does everything it can to incentivise landlords to obtain a licence, and to discourage landlords from letting properties without a licence. It should also seek to ensure tenants know as much as possible about the obligations of their landlords in this respect.

Recommendation 2: In wards where the landlord licensing scheme is in force, the council should continue work to raise tenants' awareness of it (and more widely if it is expanded beyond these wards). It should also publish a "plain English" guide for tenants on landlords' obligations under the scheme.

Recommendation 3: The council should better publicise the existing systems for residents to anonymously report non-compliant landlords under the landlord licence scheme.

The Borough Commander advised the task group that any fire risk assessment should be based on residents' capacity to respond to emergencies, rather than a generic response for the property. In this spirit, he explained that the LFB is moving towards collecting information

about residents after an incident, especially vulnerable people. A personal emergency plan exists for each vulnerable person, with the local fire brigade provided notification of their location and vulnerability. The task group felt that it was important for this information to be regularly updated.

In terms of housing allocation, a medical assessment is undertaken by the district medical officer to assess the suitability of a property within a five tier classification for assessing client needs. A review of fixed term tenancy will be undertaken from April 2018, which could potentially impact on allocations policy.

Recommendation 4: The council and registered providers should work with care providers to ensure that the London Fire Brigade has up-to-date information about vulnerable tenants and leaseholders.

Recommendation 5: The council and registered providers should review the appropriateness of fire detection systems in properties based on the specific needs of their tenants and leaseholders.

Storage of bulky items

Bulky items stored in communal areas can pose a fire risk, or an obstruction to escape in the event of a fire. The landlords which provided evidence to the task group stated that they took a “zero tolerance” approach to items kept in common areas, with a notice provided to clear any relevant items within 24 hours. Fly tipping is a significant issue in some estates with CCTV being installed to gather evidence for enforcement purposes, though there have been no successful cases completed in court thus far.

However, whilst the task group was pleased to note the approach of the RPs contributing to the task group, it remains concerned that other providers may not be so proactive in their attitudes towards bulky items in communal areas, and feels that this requires further effort overall.

Storage space is clearly an important factor in this regard, particularly for vulnerable residents who may rely on bulky equipment. For example, Network Homes have purpose built structures for mobility scooters within sheltered properties, while Catalyst Housing has created a list of vulnerable tenants, with plans to create extra storage space separate from their properties.

The council has stated that it will review the additional provision for storage of bulky items based on the FRAs undertaken this year.

Recommendation 6: All landlords should take a “zero tolerance” approach to bulky items kept in common areas.

Recommendation 7: All social landlords should provide storage space for bulky items for all property types and sizes.

Recommendation 8: The council should continue to develop plans and seek funding for secure bicycle storage units across the borough.

Emergency vehicle access

The issue of illegal parking in locations meant for the use of emergency vehicles was identified by members as an important area of focus, for both council and RP estates. The necessary

road markings to prohibit parking in these locations are often unclear, and some areas in which parking is prohibited are not explicitly marked as such. These require immediate attention from social landlords to ensure high standards in safety for all Brent residents.

Parking contractors issue permits for residents and visitors, and provide enforcement where parking rules are broken. These include Parking Charge Notices. Wing Parking is the contractor for the council's estates as well as some RPs, and its enforcement includes increased patrols during event days. However, this has limitations. For example, on council estates enforcement is undertaken only between 6am and 10pm. The task group heard that gathering evidence late at night can be difficult, as poor light makes it hard to take photos as necessary evidence.

As can be seen in Annex 3, over a period between 2013 and 2017, 9579 parking offences were recorded in council estates. Of these, 984 (over 10%) related to parking in areas or positions where this was not permitted (as opposed to lacking the relevant permit or disabled badge). Whilst it cannot be known how many of these would have obstructed the access of a fire engine into the estate, this nonetheless demonstrates that better communication is required to inform residents where they should not park, and stronger policies and practice to deter them from doing so - particularly when this can impede the emergency services. These principles apply to both council and RP estates.

Recommendation 9: The council and registered providers should act to reduce unauthorised parking in areas for the use of emergency services, including:

- **clearer and better maintained signage and markings to identify those areas permitted for car parking, and all those areas which are to be kept clear**
- **improving awareness of traffic and parking rules, and**
- **stronger enforcement of parking rules.**

Resident awareness

In addition to the findings above, the task group felt that there were a number of other actions available to improve the levels of awareness and measures to enhance fire safety in Brent. The Chair of the group informally consulted residents at the Brent Connects meeting in Willesden Library in November 2017, and found that a worrying proportion of those responding (around half) could not confirm that had a smoke alarm, or that they tested it on at least a monthly basis.

This was far from statistically robust research, and the sample group likely contained mostly owner-occupiers and a smaller proportion of private tenants, with very few social tenants. Nonetheless, it supported a concern amongst the task group members that levels of awareness of basic fire safety are far from where they should be, and this remains a continuous challenge which requires further effort to address.

Recommendation 10: The council and registered providers should regularly use their communication channels to inform and raise the awareness of residents in relation to fire safety.

Recommendation 11: The council and registered providers should provide, in the main entrance of all types of property, floor plans identifying the location of fire exits, and clearly and simply explaining what to do in case of a fire.

Annex 1 Cause of fire incidents from FY13/14 - 16/17

Ignition Source Group	2013/14	2014/15	2015/16	2016/17
Not confirmed	285	223	266	303
Cooker	104	107	93	110
Electrical distribution	61	57	51	51
Other ignition source	46	38	58	46
Vehicle related	39	26	35	37
Smoking related	44	40	46	37
Matches and Candles	25	23	32	24
Other item	12	17	16	17
Kitchen appliances	19	25	24	16
Lighting	12	10	13	15
White goods	8	15	15	9
Heating appliances	11	8	7	7
Domestic appliances	1	1	4	3
DIY	3	3	3	3
Audio-Visual	1	1	3	1
Grand Total	671	594	666	679

Source: London Fire Brigade

Annex 2 Cause of death from fire in residential properties from FY13/14-16/17

Property Class	Ignition Source Group	2013/14	2014/15	2015/16	2016/17
Dwelling	Matches and Candles	0	0	0	1
	Not confirmed	0	0	1	0
	Smoking related	1	0	0	0
Other Residential	Smoking related	0	0	1	0
Grand Total		1	0	2	1

Source: London Fire Brigade

Annex 3

Parking Offences on council estates between 2013 – 2017

	No Parking Permit	Not Clearly Displaying a Valid Permit	Not Parked in a Designated Area	Obstruct ive Parking	Parked on Cross Hatching	Parked on Yellow Lines	Parking in Disabled Bay without clearly displaying a Valid Disabled Badge	Parking in No Parking area	Unauthorised Parking	Grand Total
Grand Total	4164	4356	22	30	52	198	75	677	5	9579