



Glasgow and West of Scotland
Forum of Housing Associations

GWSF response to Scottish Government consultation on Strengthening Fire Safety for High Rise Domestic Buildings

July 2019

GWSF is pleased to have the opportunity to make this short response to the consultation on behalf of our 66 members, who are community controlled housing associations based mainly in west central Scotland. A relatively small proportion of our members own high rise buildings.

1 Introductory comments

GWSF was pleased to be represented on the Fire Safety Regime Review Advisory Group, and the Forum welcomes the thoroughness with which the current fire safety regime for high rise housing has been conducted.

In particular we welcome the fact that after the Grenfell tragedy, the Scottish Government avoided knee-jerk reactions in relation to high rise housing. All decisions on fire safety in both new and existing housing should be based on objective assessment of the risks and the costs and benefits – not least as the costs often fall on social housing tenants who are already among the poorest in our communities.

Specifically on sprinkler systems, however, we note (outwith this consultation) that whilst these are to become mandatory for all *new* social housing, we believe there is a lack of clarity over the conclusions of the Review Panel in relation to the retrospective installation of sprinkler systems in existing flats.

Confusion over this should be addressed as soon as possible by the Scottish Government, and we would argue that no decisions on retrofitting flats should be taken without a full cost-benefit analysis, including the impact on keeping social rents affordable as poverty levels rise: policy on fire safety does not exist in a vacuum and needs to be considered alongside wider social, economic and environmental objectives.

We recognise that the Scottish Government will be further reviewing the position on high rise housing after the Grenfell Inquiry report has been published.

We also note the likelihood of changes relating to 'specialised' housing, following recent changes in England. On this issue, a clear definition of specialised housing will be important: as an example, much housing that would previously have been described as sheltered has now been pared down as the level of 'warden' cover has reduced or gone altogether, although the essential design of the accommodation is less likely to have changed.

2 Fire safety information for residents

Some of the consultation feedback on fire safety information is being sought directly from tenants and residents, and is not for GWSF to comment on. Generally, though, we are very supportive of good, accessible advice being available to high rise residents. We are confident that our members with high rise housing were already providing a good standard of advice before Grenfell and, of course, all have reviewed this in the wake of Grenfell. Any targeted public information campaign by the Scottish Government is likely to complement landlords' efforts well.

We welcome too the particular focus being proposed on information about keeping common areas clear. Feedback from members suggests this has long been an issue in all forms of commonly owned housing and not just in high rise dwellings.

We recognise that the notion of introducing stronger powers to prevent stairwells etc. from being blocked is a fraught one. We understand that there has been some discussion within the review groups of using/enhancing powers under the Civic Government (Scotland) Act to help address such behaviour.

Social landlords are in a difficult position here, as enforcing any kind of conditions is hard enough with the landlord's own tenants, and all but impossible in relation to owners in mixed tenure blocks. Any new landlord powers would, as now, rely mainly on tenants/owners demonstrating goodwill in co-operating with instructions to remove items: landlord sanctions enabling actual enforcement would be unlikely to exist without very significant legislative change, which we do not believe is the right or proportionate solution here.

The obvious advantage of the SFRS having greater powers is that their remit extends to all housing and not just social housing. Also, we believe, people are more likely to act on instructions from SFRS than from their landlord: SFRS will be seen as the experts on fire safety and more authoritative than landlords.

We appreciate, though, the practical difficulties of exercising these powers across all tenures – most obviously the resource implications – but Scotland has a lot of commonly owned housing and policing current duties on residents would clearly be resource-intensive and unlikely within existing SFRS means.

3 Draft fire safety guidance

GWSF welcomes this guidance, which is helpful in bringing together existing requirements and good practice advice. We note the indication that the Scottish Government will consider making all the guidance a legal requirement if necessary. At this stage, the Forum does not believe that risk levels for residents of high rise buildings warrant a more draconian approach. No amount of legislation will prevent occasional fires in individual flats: the crux issue is that not one death has been recorded in the last ten years involving someone other than the resident of the individual flat, albeit any injury or fatality is of course deeply regrettable.

4 Next steps

The Forum looks forward to continued dialogue on fire safety both through our representation on the Review Group and in our direct liaison with Ministers and officials in the coming months and beyond.