Ministry for Housing, Communities & Local Government
Sprinklers and other fire safety measures in new high-rise blocks of flats
Response from AXA UK

1. AXA UK (AXA) is part of the AXA Group, a worldwide leader in financial services, operating in 61 countries with over 170,000 employees and 105 million customers. AXA has around 11 million customers in the UK and operates through specific operating companies – AXA Insurance and AXA PPP healthcare.

Executive Summary

2. AXA welcomes the opportunity to submit to this consultation, and the Government's commitment to identify and implement improvements to building safety requirements in the UK. AXA has previously engaged with the Government on fire safety issues including on the Interim Report of the Independent Review of Building Regulations and Fire Safety.

3. AXA agree that the height threshold for sprinkler provision in new blocks of flats should be reduced from 30 metres. However, AXA would urge the government to consider protecting all new blocks of flats with sprinkler provision regardless of height. Sprinklers are effective at identifying and controlling the development of fires as part of a holistic approach to fire safety. AXA believe that this approach would improve fire safety in all new blocks of flats whilst improving consistency of building standards across the UK.

Sprinkler provision in new high-rise blocks of flats

Question 1
Do you agree or disagree that the height threshold for sprinkler provision in new blocks of flats should be reduced? [Agree/Disagree]
1b - If you agree that the height threshold should be reduced, what should the new threshold be and what is the evidence for this particular threshold?

4. AXA agree that the height threshold for sprinkler protection in new blocks of flats should be reduced from the current requirement of 30 metres.

5. AXA would urge government to consider protecting all blocks of flats regardless of height. Fire does not discriminate against the height of a building or the nature of residents specific or specialist needs. Although AXA is acutely aware that sprinklers on their own do not solve all fire safety issues in high-rise flats, there is strong evidence that sprinklers are effective at identifying and controlling the development of fires, improving the safety of individuals and controlling the damage to property.

6. Moreover, the Scottish Government is currently examining proposals for mandatory provision of sprinklers for all blocks of flats regardless of height. Given the movement in devolved areas, AXA would urge the government to consider the benefits of harmonised regulation across the UK which would provide consistency for developers and building managers whilst ensuring appropriate building standards are maintained.

7. If the government is determined to stipulate a height threshold, AXA would recommend no greater than 11 metres. This would be in alignment with recent regulatory movements in Scotland to lower the trigger threshold for non-combustibility of external wall cladding from 18 metres to 11 metres. The fire at a block of flats in Worcester Park, south-west London, in

September 2019 highlights the damage fire can do to buildings currently under 18 metres in height. Examples such as Worcester Park show the need to consider going further on sprinkler provision, especially in relation to buildings that involve more combustible elements of construction.

Question 2
Do you agree or disagree that these systems should be designed in accordance with the relevant guidance in BS 9251? [Agree/Disagree]
2b - If you disagree, what specifications and performance should be required?

8. AXA agree that the system should be designed and maintained in accordance with BS9251 guidance. However, AXA would also call for the design, installation and maintenance of the system to only be by contractors with appropriate third-party accreditation.

Question 3
Do you agree or disagree that there should be a transitional period of six months? [Agree/Disagree]
3b - If you disagree, how long should the transition period be?

9. Yes, AXA agree that there should be a transitional period of six months, but this period should only apply for projects that have commenced with site construction underway. It is not acceptable if the transition period allows developers to fast track projects through the planning process with the aim of avoiding sprinkler protection.

Wayfinding signage for fire and rescue services

Question 4
Do you agree or disagree that there should be a more consistent approach to wayfinding signage for fire and rescue services in Approved Document B? [Agree/Disagree]

10. Yes, AXA agree that there should be a more consistent approach to wayfinding signage. Consistent wayfinding signage is extremely important for ensuring that there is concise and accurate communication for both building managers and the fire and rescue services.

Question 5
Are there any existing standards or guidance which should be introduced to the guidance provided in Approved Document B? Please specify.
5b – Does this guidance need to be supplemented or amended for inclusion in Approved Document B? If yes, please specify how.

11. AXA believe that fire and rescue services should be consulted to understand any changes which could be made to improve standards, access and facilities for fire fighters currently encountering issues. Existing standards or guidance that is transferred should be clearly outlined in Approved Document B.

Question 6
What views exist on the benefits of each signage option set out above?
6b - What is the preferred option set out above for wayfinding signage? Vinyl lettering, photoluminescient lettering, emergency powered lighting luminaries, other (please specify).

12. Wayfinding signage is most appropriate when a serious incident is ongoing, and confusion could arise from smoke-filled rooms, corridors and stairways. Decisions related to the use of different signage options should be based on the most appropriate system for the worst-case scenario.

13. AXA believe that vinyl lettering is of little use when lighting conditions are poor, or vision is obscured by smoke. Photo luminescent lettering is effective in many conditions however, AXA would question their effectiveness in the event of poor visibility caused by excessive smoke.

14. Emergency powered lighting is currently a primary method of fire safety in buildings. Given its usage is widely accepted for the purpose of protecting both fire fighters and residents, AXA would consider this option as preferable. The use of emergency powered lighting would be an extension to an installation already in situ rather than a separate installation.

Evacuation alert systems

Question 7
Should Approved Document B include a requirement for an emergency evacuation system, which could support fire and rescue services operational response by alerting residents if they need to evacuate? [Yes/No]
7b – For each response, what views exist on the benefits and risks of such an approach?

15. Yes, an emergency evacuation system should be a mandatory requirement as is being introduced in Scotland. Emergency evacuation systems provide fire and rescue services with an option to notify all occupants of a change in the evacuation strategy should circumstances dictate that this is necessary. Given that occupants of high-rise blocks of flats are diverse in both their characteristics and their specific needs, an emergency evacuation system can overcome barriers of language or understanding that may prevent an occupant from quickly evacuating an at-risk premises.

16. AXA reject the concerns raised regarding further hazards resulting from this strategy. The system would only be activated by a commanding officer on the ground after due consideration of all risks of an incident. AXA welcome the development of a new standard of evacuation alert systems for high-rise blocks of flats in Scotland, this standard needs to be inclusive by considering the needs of both the fire and rescue services and all residents.

Question 8
If this requirement was introduced to Approved Document B, above what height threshold should this system be required?
8b – For each response, please provide evidence to support your answer

17. AXA believe that the requirement should be consistent with the accepted mandatory height threshold for the installation of sprinklers. As outlined elsewhere in this consultation, AXA believe this height threshold should be no greater than 11 metres. This measure would ensure that the guidance for fire safety takes into consideration both appropriate risks and consistency across UK fire safety measures.

Question 9
Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts in the following areas.
a) Sprinkler provision in new high-rise blocks of flats
b) Wayfinding signage for fire and rescue services
c) Evacuation alert systems

18. N/A

Question 10
Are you aware of any particular equalities impacts for these proposals? How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.

19. AXA is not aware of any particular inequalities impacts for these proposals.

If you need to get in touch regarding the information in this submission, please get in touch with Public Affairs Executive, Jonathon Murphy, at jonathon.murphy@axa-uk.co.uk or on 07866032309.