

MAYOR OF LONDON

Date: 5 March 2020

Dear London building owner/manager,

Following the tragedy at Grenfell Tower, the housing sector must not wait for legislation to start making buildings safe. It is crucial that everyone acts now.

I want to draw your attention to a range of recommendations to improve the safety of residential blocks. We must be at the forefront of best practice and take the necessary steps to offer the highest standards of fire safety in our city. It is imperative that we engage residents, and a more accountable, open and transparent relationship with them must be at the core of any actions we take to improve the safety of our buildings. Londoners deserve to have confidence that their homes are safe.

My recommendations are appended and are primarily based on the Grenfell Tower Inquiry (GTI) Phase 1 recommendations, which I support fully. The recommendations are also informed by Dame Judith Hackitt's Independent Review of Building Regulations and Fire Safety, and other emerging best practice. They are presented in three categories: first, recommended changes to the way existing buildings are managed which can be implemented now; second, recommended changes to the way existing buildings are managed which you can begin preparing for in advance of new legislation; and finally, recommended changes to the way new buildings are designed and constructed.

The Grenfell Tower fire was a tragedy that will never be forgotten. I believe that by acting swiftly on these recommendations, we can help restore Londoners' confidence in the buildings they live in. I am committed to working with you to adopt these recommendations and trust you will take the necessary action to ensure we prevent another tragedy like this from ever happening again.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small number '2' written below the name.

Sadiq Khan
Mayor of London

MAYOR OF LONDON

Building safety recommendations for building owners/managers of residential blocks

Recommendations for existing buildings which can be implemented immediately

The Mayor encourages building owners and managers to begin taking the following actions immediately to tackle safety risks in their buildings:

1. **Resident engagement:** The Hackitt Review¹ stresses that the involvement of residents must be at the heart of a new approach to building safety, which supports the principles of transparency of information and partnership with residents.

The Mayor strongly encourages building owners/managers to adopt these principles and embed them in the way they manage buildings, make decisions, and build relationships with residents. The Hackitt Review makes reference to tenant scrutiny panels in Scotland as an example of effective resident engagement. These panels identify an issue to investigate and are given access to the necessary information from the landlord or building manager. This system has resulted in positive resident engagement outcomes and the delivery of better services.

Additionally, the National Housing Federation has developed a four-point plan that aims to strengthen the relationship between residents and housing associations. The plan includes the creation of a “Together with Tenants Charter,” and supports residents in having a stronger role in holding housing associations accountable.

2. **Advice note from the Government:** In January 2020, the Government, with the support of local fire and rescue services and a panel of independent expert advisers, published a consolidated advice note² on the measures building owners should take to ensure their buildings are safe. It is the responsibility of building owners/managers to review their buildings, involving competent professionals, and make decisions on any remedial work that is necessary.
3. **Wayfinding signage:** Wayfinding signage, such as floor numbers, is a relatively low-cost option for improving safety. The Grenfell Tower Inquiry (GTI) report³ recommends having floor numbers clearly marked in all high-rise buildings. Building owners/managers are encouraged to install wayfinding signage in their buildings, where it is not already in place. It is also recommended that they display floor numbers on each landing within the stairways, and in prominent places, such as lobbies. It is strongly advised that this signage is of sufficient size and colour contrast to the background to be readily visible, both in normal conditions and in low lighting or smoky conditions.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707785/Building_a_Safer_Future_-_web.pdf

² <https://www.gov.uk/government/publications/building-safety-advice-for-building-owners-including-fire-doors>

³ <https://www.grenfelltowerinquiry.org.uk/phase-1-report>

MAYOR OF LONDON

4. Fire Risk Assessments (FRAs): FRAs are essential to better understand the risk of fire spread in buildings and identify what needs to be done to prevent fire and keep people safe. The Regulatory Reform (Fire Safety) Order 2005 legally requires building owners/managers to conduct and regularly review FRAs of their buildings. The Government has urged social landlords to publish FRAs. The Mayor supports this position and advises that both social and private sector building owners/managers publish FRAs or otherwise make them available to residents.

The current guidance on FRAs, “Fire Safety in Purpose Built Blocks of Flats” was issued by the Local Government Association in 2012. It identifies four types of risk assessments, which vary in their level of intrusion and the areas of the building they cover. To have certainty of the level of risk in our buildings, the Mayor strongly recommends building owners/managers conduct Type 4 FRAs in high-rise buildings. These FRAs involve an assessment of all parts of the building, including flats, and will help to enhance fire safety.

5. Inspection of fire doors: The GTI report recommends that the owner/manager of every residential building containing separate dwellings, regardless of their height, should carry out an urgent inspection of all fire doors to ensure that they comply with applicable legislative standards. This recommendation involves the inspection of entrance doors to individual flats whose external walls incorporate unsafe cladding. Additionally, the report suggests that owners/managers of every residential building containing separate dwellings, regardless of their height, should carry out checks at not less than three monthly intervals to ensure that all fire doors are fitted with effective self-closing devices in working order.

Building owners/managers are encouraged to refer to the latest advice note⁴ published by the Ministry of Housing, Communities and Local Government (MHCLG) on fire doors. The Mayor recognises that, in the absence of legislation, building owners/managers may not always be able to get permission from residents in order to access individual flats, and that there may be practical implications arising from such regular checks that the Government should consider.

6. Lift inspections: The GTI report recommends building owners/managers of every high-rise residential building should carry out regular inspections of any lifts that are to be used by firefighters in an emergency, and that these inspections should also test the mechanisms that allow firefighters to take control of lifts.

The report further recommends that this information should be shared with local fire and rescue services. In preparation for new legislation, the London Fire Brigade (LFB) is considering how it would receive, record and use any new information provided by building owners/managers. The National Fire Chiefs Council is also considering national solutions for this. In the meantime, building owners/managers are strongly advised to ensure they are carrying out effective regular checks, maintaining fire lifts in good working order and repair, and are keeping relevant records.

⁴ <https://www.gov.uk/government/publications/building-safety-advice-for-building-owners-including-fire-doors>

MAYOR OF LONDON

Recommendations for existing buildings which building owners/managers can begin preparing for

The following recommendations may not be ready for implementation in advance of legislation or further instructions from authorities. Nevertheless, the Mayor urges building owners and managers to begin preparations now, where they can do so:

7. Premises information box systems: The GTI report recommends that the owner/manager of every high-rise residential building should ensure that the building contains a premises information box that includes a copy of up-to-date floor plans, as well as information about any lift intended for use by fire and rescue services.

In preparation for new legislation, the LFB is considering how it would use any new information provided by building owners/managers. In the meantime, building owners/managers are strongly encouraged to start collecting the information they would include in their premises information box, and start putting in place arrangements to keep the information up to date, in accordance with the General Data Protection Regulation (GDPR) and Data Protection Act (2018).

8. Building plans on key fire safety systems: The GTI report recommends that the owners/managers of every high-rise residential building ensure that they have up-to-date plans, in both paper and electronic form, of every floor of the building, identifying the location of key fire safety systems. Building owners/managers are strongly advised to start collecting this information and keeping their own records.
9. Information about external walls: The GTI report recommends that building owners/managers of every high-rise residential building should record information about the design of its external walls, together with details of the materials of which they are made. The report further recommends that this information should be shared with local fire and rescue services.

In preparation for new legislation, the LFB is considering how it would receive, record and use any new information provided by building owners/managers. In the meantime, building owners/managers are strongly encouraged to start collecting this information, if it is not already available and verified, and keeping their own records to ensure they are available to fire risk assessors.

10. Personal Emergency Evacuation Plans (PEEPs): The GTI report recommends that owners/managers of high-rise residential buildings are required by law to prepare PEEPs for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition).

We recognise the challenges of implementing this recommendation, in the absence of legislation and in light of the General Data Protection Regulation (GDPR) and the Data Protection Act (2018), with which any records should be compliant. This may also be particularly challenging in general needs blocks with changing residents. However, building owners/managers are encouraged to start building a list of residents and their individual needs, and start putting in place arrangements to keep the information up to date.

MAYOR OF LONDON

11. Building Safety Manager role: The Hackitt Review recommends that building owners/managers employ a Building Safety Manager who would be responsible for ensuring building safety is maintained to the highest standards and promoting resident safety and engagement.

The Building Safety Manager role does not currently exist. The Competency Steering Group, a sector-led organisation, has been tasked with developing the competency framework for the role. However, building owners/managers are encouraged to start preparing for this recruitment process, in advance of the publication of a competency framework.

Recommendations for the design and construction of new buildings

The Mayor is leading by example through the new measures put in place in the London Development Panel 2⁵ (LDP2) and the new London Plan.⁶ The following recommendations are based on these measures, and the Mayor believes they should also be considered by organisations involved in the development of new buildings, or the extension or refurbishment of existing buildings:

12. Automatic Water Fire Suppression Systems or Sprinklers: Sprinklers have an excellent track record of saving lives, protecting residents, reducing property damage, controlling the spread of fire and giving firefighters extra time to facilitate evacuation.

Last year, the Government consulted on lowering the threshold at which sprinklers for new buildings are mandatory, from 30 metres to 18 metres. Subsequently, in January 2020, the Government indicated its intention to lower the threshold to 11 metres. The Mayor has long supported the LFB's campaign to increase the use of sprinklers in new developments.

The Mayor supports the installation of sprinklers in the following buildings:

- All purpose-built blocks of flats (including conversions, student accommodation and hotels);
- All homes where vulnerable people live;
- All buildings housing vulnerable residents, such as care homes or sheltered accommodation;
- All schools; and
- All buildings/conversion of any type that are of 18 metres in height or more.

The Mayor also encourages building owners/managers to take advantage of opportunities to retrofit sprinklers in existing buildings.

⁵ <https://www.london.gov.uk/what-we-do/housing-and-land/land-and-development/london-development-panel-2>

⁶ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan>

MAYOR OF LONDON

13. Combustible items in the walls of relevant buildings: The combustible materials ban was introduced through the Building Regulations in December 2018 for buildings over 18 metres. In January 2020, the Government launched a consultation to lower the combustible cladding ban to at least 11 metres. Whilst he welcomes this as a positive step, the Mayor strongly supports extending the ban to apply to all buildings, regardless of height or use, and urges anyone involved in commissioning or constructing new buildings to adopt this approach.
14. Water supply for firefighting: Access to, and proximity of, water supplies are critical resources that fire and rescue authorities need to protect communities from the effects of fire. The LFB has recommended that all new buildings or conversion of existing buildings into a residential accommodation include water supplies for firefighting, in accordance with Water UK's national guidance document.
15. Recalls and white goods: The LFB has encouraged building owners/managers to register any electrical products, such as white goods, that are built into the property. This will help to pick up any recalls. The LFB has also advised building owners/managers to encourage residents to register any white goods which the residents themselves bring into their new homes.
16. Safe and dignified evacuation: The new London Plan requires that all new buildings are designed to incorporate safe and dignified emergency evacuation for all building users. Where lifts are installed, at least one lift per core should be a suitably sized fire evacuation lift, adequate to evacuate people who require level access.