

**Personal Emergency Evacuation Plans in High-Rise Residential Buildings
recommendations from the Grenfell Tower Inquiry Phase 1 report**

**Government Consultation Report
issued by the Home Office on 6 June 2021**

***Consultation Response
from the Royal Borough of Kensington and Chelsea***

1.0 Introduction

The Royal Borough of Kensington and Chelsea (RBKC) has an especial concern about this issue, as 72 of its residents lost their lives in the Grenfell Tower fire tragedy in June 2017. This tragedy has had a shattering impact on our community and we are fundamentally resolved to do everything possible to make sure that such a terrible event does not happen again; not here, not anywhere. It is critical that all housing authorities learn both the wider policy lessons from this tragedy as well as the detailed practical lessons about how housing management and maintenance practices should be conducted to the highest possible standard. The safety of all people living in high rise accommodation is a primary consideration for building owners and managers. Our Council continues to express its deep sorrow for the loss of life at Grenfell Tower and for the traumatic impact this has had upon the bereaved, the survivors and the local community of our Borough.

We are keen to see radical improvements to those statutory regulations to ensure greater safety to residents in high rise buildings. And we are especially keen for there to be clarity on the requirement for personal emergency evacuation plans (PEEPs) for those with generalised or particular vulnerabilities. The fire at Grenfell Tower and the tragedy involving such loss of life, should never have happened.

We recognise that the Grenfell Tower fire had a disproportionate impact on those residents with mobility, cognitive or other impairments. And we welcome any proposals, to be required by law, to ensure that authorities and companies with housing responsibilities address this important issue. Across the country we need to learn lessons so that a tragedy like this never happens again.

It is vital that every resident who requires a personal emergency evacuation plan (PEEP), tailored to their needs, is afforded the opportunity to be provided with one.

2.0 The relevant recommendations made by the Public Inquiry

In its report at the end of Phase 1, the Public Inquiry recommended:

- that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition);

- that the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box;

We note that the consultation seeks to address these two points and we welcome the proposal to implement the recommendations.

3.0 Our approach to PEEPs since January 2020

We fully support the recommendations set out in the Public Inquiry's Phase 1 report and have taken steps to implement measures that meet those recommendations.

To date, we have written to all residents in blocks with a storey height of 11 metres or greater, as well as those who live in blocks in which we have changed the evacuation strategy from 'stay put' to 'simultaneous evacuation', to ask whether they want or need a PEEP. Letters have been sent to residents in all of those blocks, which has included 5,734 homes this year. We will continue to write on an annual basis to residents to encourage residents to self-identify their vulnerability where appropriate.

Further, we have sent out fire safety leaflets to all residents to inform them how they can get in touch with us to arrange a person-centred fire risk assessment and PEEP. This also covers residents in blocks below 11 metres in height, which we feel is appropriate, as it allows us to offer the same service to all residents, regardless of the height of the building in which they live. We have also updated our fire safety information for disabled people. In future, we will write to all residents each year regarding PEEPs.

To date, this has resulted in us being able to identify residents who may have a form of vulnerability in case of fire, and we have carried out 238 person-centred fire risk assessments, as well as preparing 148 personal emergency evacuation plans.

These plans are building and person-specific, and we feel that it is absolutely vital that all plans are tailored to circumstances in this way.

In particular, we have focused on the need for disabled people to safely self-evacuate, where feasible, using standard passenger lifts where safe to do so. As such, where residents are able to evacuate from their home into the common lift lobby, and can close the doors to both the room in which the fire has started and their flat entrance door, we feel that it is safe, in the early stages of an incident, for the lift to be used for self-evacuation purposes.

Where residents are unable to evacuate from their home, our emergency arrangements focus on providing automatic extinguishing systems within the flat with the objective of maintaining tenable conditions within the home.

We have installed premises information boxes (PIBs) in all of our local authority buildings that are 18 metres or higher. These provide floor plans and details of vulnerable persons within the blocks, including their locations, for use by the fire and

rescue service. We have placed an order for PIBs in all our other buildings that are between 11 to 17 metres in height; for these we are currently waiting delivery.

Additionally, we have reviewed our external walls and taken action where we have found significant quantities of combustible material. This has included removing external wall insulation systems from two buildings, as well as implementing a waking watch in a further building (under 18 metres) where we found spandrel panels of concern. Our approach has focused on ensuring that the 'Plan A' is not compromised and that the original building fire strategy is relevant and robust.

4.0 General comments on the proposals

Proposals 2 and 4 – proposed templates for recording PEEPs and PIB information

We welcome the templates provided in the consultation, both for recording individual PEEPs, and for recording information for use by the fire and rescue service within the premises information box. We feel that this will assist in consistency of recording information across the country.

Proposal 3 – proposal to require information to be provided in a PIB

We fully support the proposed requirement for information to be provided in PIBs for use by the fire and rescue service, and for this information to be kept up-to-date. We feel that this is essential in ensuring that the fire and rescue service have access to the information they need in an emergency, although we also note that, in future, there may be technological solutions that can also assist with information sharing (subject to addressing challenges relating to GDPR, etc.).

Proposal 1 – proposal to require PEEPs for residents who self-identify

We welcome the recognition that PEEPs need to be tailored to individual circumstances and fully support this.

Our experience so far has identified some specific examples or circumstances where the approach proposed in the consultation may not be appropriate or effective and which we suggest should be reviewed, namely:

- A resident who is paralysed from the neck down, who does not have any family members, and whose neighbours are engaged in 'cuckooing' of the vulnerable resident.
- Single staircase residential buildings, whereby there are risks to evacuating those not directly impacted by a fire down the staircase by which fire-fighters are accessing the fire floor. In particular, if a wheelchair user on an upper floor becomes aware of a fire through attendance of the fire and rescue service (i.e. when they hear sirens and see fire appliances attending their building) and then seeks to evacuate via a single stair, particularly during fire-fighting operations, we have some concerns that evacuation could lead to injury of those involved in a PEEP when the doors are opened (albeit controlled by the fire service) to the fire flat, any lobbies and the stair enclosure. This requires

further thought from Government as to how to practically overcome such challenges, and we provide some thoughts on this in Section 5.

- A building that houses multiple wheelchair users on various floors, where evacuation of all wheelchair users at the same time may cause resource issues with the need for large numbers of nominated evacuation assistants, and also issues where there are narrow staircases or differing evacuation velocities.

We set out some thoughts on how these might be addressed in Section 5 of our response.

5.0 Our recommendations on improving the existing proposals

General principles of the consultation

First, selecting blocks with a finished floor level of 18 metres or greater may create a two-tier level of safety. The reason for the threshold is not sufficiently clear and may be challenged for being arbitrary. Selecting 18 metres as an arbitrary height is problematic, as the issues surrounding external walls has shown us, and we would suggest that buildings of all heights are included. This would provide a consistent approach to residents in all residential buildings.

Secondly, if the proposals are to provide evacuation for those who choose to evacuate, and do not necessarily need to do so for safety purposes, the implications need to be properly thought through so that the proposals themselves do not cause safety problems. For example, in order for PEEPs to achieve this safe evacuation, there needs to be a dedicated staircase for use by fire-fighters accessing blocks, including provision of a dedicated fire-fighting lift in high-rise accommodation. In order to achieve this, substantial modification of existing residential buildings will be required, and this will require funding from central government.

Thirdly, there are challenges in appointing two persons to manage PEEPs in all cases. Certainly, in some individual cases, family members or care staff, or indeed willing neighbours, may be able to enact PEEPs, but this might not be the case for each individual circumstance. Where this cannot be achieved, at least two 24/7 permanent staff should be employed in each building in order that PEEPs can be implemented properly. (If larger numbers of disabled persons live in the building, more staff may be required.)

Fourthly, and linked to the above, consideration needs to be given to the risk of an unintended impact of the proposals on those residents with disabilities. In the private sector, some providers are likely to recharge other tenants and leaseholders to implement PEEPs, which puts the financial burden on all residents. We suggest that a consistent, nationwide approach is needed, and that legislation accounts for clear consideration as to how indirect discrimination is avoided.

Finally, to change strategies in existing residential buildings brings with it challenges that can only be overcome through upgrades to existing buildings. This links into our second point on the need for dedicated fire-fighting staircases to ensure that PEEPs can be enacted safely where the person being evacuated is doing so via a

single stair. There should be funding for the retrofitting of sprinklers in all residential buildings. We note the approach taken by Welsh Government of requiring sprinklers in all new residential buildings and RBKC have taken this approach by specifying that all new homes owned by the Council will be fitted with sprinklers, regardless of height. However, to afford additional safety and redundancy to existing residential buildings, sprinklers will be a key part of supporting the safe introduction of the approach to PEEPs set out by Government in the consultation.

We urge Government to learn the lessons from the cladding crisis. Tenants and leaseholders across the country are under enormous pressure arising from the pandemic, and this is undoubtedly set to get worse in the coming months and years. We support fully the intention to introduce PEEPs and enhance building safety through other physical measures. However, we must raise with Government that the costs of improving building safety must receive central funding and not be left to be borne by residents or housing providers.

6.0 Specific response to the consultation

Q1 – Organisation

Q2 – d, e, f, h, k – RBKC meets the criteria for multiple categories set out in the consultation.

Q3a – Royal Borough of Kensington and Chelsea (RBKC)

Q3b – Dan Hawthorn

Q3c – Executive Director with responsibility for the Council’s Housing Management department.

Q3d – we are not a residents’ group.

Q3e – none of the criteria set out in the consultation applies – we employ more than 1,000 people.

Q4 – not applicable.

Q5 – We strongly agree that PEEPs are prepared for every resident who self-identifies and requests a PEEP.

Q6 – See qualitative response set out in Sections 1 to 5 of our response.

Q7 – We strongly agree with the proposal to provide a template to record PEEPs.

Q8 – We believe that the template provides a means for consistency across the country.

Q9 – We strongly agree that premises information boxes be required.

Q10 – We believe that premises information boxes are a reasonable tool to assist the fire and rescue service during emergencies.

Q11 – We strongly agree with the proposal to provide a template to record information in premises information boxes.

Q12 – We again believe that this provides a means for ensuring consistency of information.

Q13 – We feel that the template could benefit from additional information relating to any consideration of self-evacuation (e.g. through safely using the standard passenger lift during the early stages of a fire, when it is only the occupant of the fire-affected flat who will be evacuating).

Q14 – No, we feel the PIB template is reasonable.

Q15 – c – We feel that a PEEP should be reviewed as soon as practicable if the resident indicates a change in circumstances to the responsible person.

Q16 – a – we feel that it is reasonable to review information in the premises information box every six months, if this is a simple check that the information is in place.

Q17 – Cost must be considered and funds must be made available by central government to improve fire safety in housing across the country. For full details see our response in Sections 1 to 5 of our response.

Q18 – For full details see our response in Sections 1 to 5 of our response.