

Regulatory Reform (Fire Safety) Order 2005 (As Amended)
Fire Risk Assessment



MARLBOROUGH HOUSE

Responsible person (e.g. Employer) or person having control of the premises:

Plymouth Community Homes

Block Code:

BK04880A

Address of premises:

Marlborough House, Devonport, Plymouth,
PL1 4HG.

Person(s) consulted:
(If applicable)

No-one consulted during this assessment.

Assessor:

Nigel Hill GFireE

Report validated by:

A. M. Fox

Date of fire risk assessment:

4th April 2024

Date of previous fire risk assessment:

4th April 2023

Suggested date for review:

6th April 2025

This report is intended to assist you in compliance with Article 9 of the Regulatory Reform (Fire Safety) Order 2005 (As Amended) which requires that a risk assessment be carried out.

EXECUTIVE SUMMARY

The premises overall Risk Rating

The overall risk rating has been determined considering the life safety occupancy within the premises which – under Part 2 (8) of the Regulatory Reform (Fire Safety) Order 2005

It is considered that the risk to life from fire is **TOLERABLE** - No major additional controls required.
However, there might be a need for improvements that involve minor or limited cost

INTRODUCTION

This Fire Risk Assessment report addresses the requirement to carry out suitable and sufficient risk assessments under the requirements of Article 9(1) of the Regulatory Reform (Fire Safety) Order 2005 (As Amended).

Scope of the Risk Assessment

The report represents Plymouth Community Homes' (PCH) understanding for the current building designs and use, the fire strategy and proposed evacuation procedures. It is to provide an assessment of the risk to life from fire and does not address building or property protection or business continuity. The report is not an assurance against risk and is based on the best judgement of the assessor involved. The assessment may rely on information given by others outside of PCH and no liability is accepted for the accuracy of such information.

The Risk Assessment Procedure

This report considers the following aspects of fire safety and also reflects the fire safety standards identified during the assessment in each area of the building being inspected:

- Sources of Ignition / Fuel
- Persons at Risk
- Fire Detection and Warning Systems
- Means of Escape
- Provision of Fire Fighting Equipment
- Emergency Evacuation Plans and Training
- Maintenance and Testing of Fire Safety Equipment
- Signage
- Plant Emergency Procedures
- Building Plans & Fire Provisions

Limitations of the Risk Assessment

This report has been written following a visual non-invasive inspection only, and if any problems, irregularities or defects are suspected, then they are noted where the assessor judges them to be urgent, significant or helpful.

The inspections undertaken in order to compile this report do not include any areas which were concealed or closed in behind finished surfaces, such as flooring, walls or ceilings, or which required the moving of anything which impeded access or limited visibility, such as floor coverings, furniture, appliances, personal property, vehicles, vegetation, debris or soil.

Recommendations

The recommendations made by the assessor are outlined in the Action Plan. This sets out the measures that are considered necessary to satisfy the requirements of the Fire Safety Order and to protect people from fire. In certain instances the assessor may have made recommendations for further inspection in the report, however as a general guidance it is recommended that the 'no access' areas are inspected as soon as possible. The assessments, observations and recommendations made are only relevant to the conditions identified at the time of this assessment.

Reviewing the Risk Assessment

The Fire Safety Order requires that this risk assessment be kept under review. A date for routine review is given on the front of this report, but should any of the buildings (or their operations) change in any way, there be any reason to suspect it is no longer valid or if a major fire occurs the risk assessments should be updated accordingly.

External Wall Construction

Consideration has been given to external wall construction within this fire risk assessment

To understand the nature of, and fire risks associated with, the external wall construction, including any cladding, of this building, a EWS1 report has been commissioned by Plymouth Community Homes from qualified and competent specialist.

Recommendations from the initial findings of this report have been fully implemented.

This included removal of small strip of ACM at ground floor level and installation of fire doors at ground floor level, separating staircase from protected ground floor lobby area at main entrance.

Fire Safety (England) Regulations 2022

The Fire Safety (England) Regulations 2022 implemented the majority of the recommendations made by the Grenfell Tower Inquiry in its Phase 1 report which required a change in the law.

The regulations seek to improve the fire safety of blocks of flats in ways which are practical, cost effective for individual leaseholders and proportionate to the risk of fire.

The regulations came into force on 23 January 2023 following publication of guidance which was published on 6 December 2022.

For high-rise residential buildings (a multi-occupied residential building at least 18 metres in height or 7 or more storeys), responsible persons must:

- Share electronically with their local fire and rescue service (FRS) information about the building's external wall system and provide the FRS with electronic copies of floor plans and building plans for the building
- Keep hard copies of the building's floor plans, in addition to a single page orientation plan of the building, and the name and UK contact details of the responsible person in a secure information box which is accessible by firefighters
- Install wayfinding signage in all high-rise buildings which is visible in low light conditions
- Establish a minimum of monthly checks on lifts which are for the use of firefighters in high-rise residential buildings and on essential pieces of firefighting equipment
- Inform the FRS if a lift used by firefighters or one of the pieces of firefighting equipment is out of order for longer than 24 hours

For multi-occupied residential buildings over 11 metres in height, responsible persons must:

- Undertake quarterly checks on all communal fire doors and annual checks on flat entrance doors

In all multi-occupied residential buildings, responsible persons must:

- Provide residents with relevant fire safety instructions and information about the importance of fire doors

The Fire Safety Act (FSA) clarified the scope of the Fire Safety Order to make clear it applies to the structure, external walls (including cladding and balconies) and individual flat entrance doors between domestic premises and the common parts.

GENERAL INFORMATION

1. THE PREMISES

- 1.1 Number of floors at ground level and above: 13
- Number of floors entirely below ground level: Nil
- Floors on which car parking is provided: Nil
- 1.2 Number of flats: 121 flats in total, with 10 flats per floor (1-12) and 1 flat on the ground floor.
- 1.3 Brief details of construction and approximate age of building:
- Circa 1970, CP 3: Chapter IV: Part 1: (1962 or 1971) Precautions Against Fire (CP 3: IV) was the relevant code of practice for the fire safety design of flats and maisonettes that was likely to be in force at the time of construction.
 - External walls appear to be of traditional masonry construction, brick-built walls.
 - In 2000 the property had a flat to pitched roof conversion. The roof top plant room and a small strip around the underside of the roof have been identified as aluminium clad material (ACM). The ACM was removed in December 2021 and replaced with a pre-coated aluminium panel fire rated to classification A1/A1F1
 - Hardwood and glass panelled front entrance and rear doors, both with side panels.
 - PVCu windows.
 - Internal walls are of solid construction.
 - Level concrete floors and stairs.
- 1.4 Occupancy:
- Purpose-built, multi storey block of flats.

2. THE OCCUPANTS

- 2.1 Approximate maximum number of employees at any one time: 1 static ranger onsite but periodic visits by Housing Officers, mobile Rangers or PCH operatives.
- 2.2 Approximate maximum number of residents and visitors at any one time: 96 x 1 bed flats with max occupancy of 3 residents and 25 x 2 bed flats with max occupancy of 5 residents. 121 flats total within the building. Possible max occupancy of 413 residents.

3. OCCUPANTS ESPECIALLY AT RISK FROM FIRE

- 3.1 Sleeping occupants: 413 occupants of residential flats

3.2 Occupants in remote areas and lone workers:

Visitors, lone workers & residents.

3.3 Others:

Occasional contractors.

4. FIRE LOSS EXPERIENCE

There was no indication of anti-social behaviour. There was no evidence of previous fires in the communal parts and fire statistics (which report fire brigade incidents since 2011) report 8 fire related incidents at the property.

FIRE RISK ASSESSMENT

The following simple risk level estimator is based on a commonly used risk level estimator:

Potential consequences of fire → Likelihood of fire ↓	Slight harm	Moderate harm	Extreme harm
Low	Trivial risk	Tolerable risk	Moderate risk
Medium	Tolerable risk	Moderate risk	Substantial risk
High	Moderate risk	Substantial risk	Intolerable risk

Taking into account the fire prevention measures observed at the time of this risk assessment, it is considered that the hazard from fire (likelihood of fire) at these premises is:

Low ☐ **Medium** ☒ **High** ☐

In this context, a definition of the above terms is as follows:

- Low:** Unusually low likelihood of fire as a result of negligible potential sources of ignition.
- Medium:** Normal fire hazards (e.g. potential ignition sources) for this type of occupancy, with fire hazards generally subject to appropriate controls (other than minor shortcomings).
- High:** Lack of adequate controls applied to one or more significant fire hazards, such as to result in significant increase in likelihood of fire.

Taking into account the nature of the premises and the occupants, as well as the fire protection and procedural arrangements observed at the time of this fire risk assessment, it is considered that the consequences for life safety in the event of fire would be:

Slight harm ☒ **Moderate harm** ☐ **Extreme harm** ☐

In this context, a definition of the above terms is as follows:

- Slight harm:** Outbreak of fire unlikely to result in serious injury or death of any occupant outside the flat of origin.
- Moderate harm:** Outbreak of fire could foreseeably result in injury (including serious injury) of one or more occupants, but is unlikely to result in multiple fatalities.
- Extreme harm:** Significant potential for serious injury or death of one or more occupants.

Accordingly, it is considered that the risk to life from fire at these premises is:

Trivial ☐ Tolerable ☒ Moderate ☐ Substantial ☐ Intolerable ☐

Comments:

None.

A suitable risk-based control plan should involve effort and urgency that are proportional to risk. The following risk-based control plan is based on one advocated for general health and safety risks:

Risk level	Action and timescale
Trivial	No action is required, and no detailed records need be kept.
Tolerable	No major additional controls required. However, there might be a need for improvements that involve minor or limited cost.
Moderate	It is essential that efforts are made to reduce the risk. Risk reduction measures should be implemented within a defined time period. Where moderate risk is associated with consequences that constitute extreme harm, further assessment might be required to establish more precisely the likelihood of harm as a basis for determining the priority for improved control measures.
Substantial	Considerable resources might have to be allocated to reduce the risk. If the building is unoccupied, it should not be occupied until the risk has been reduced. If the building is occupied, urgent action should be taken.
Intolerable	Building (or relevant area) should not be occupied until the risk is reduced.

Note that, although the purpose of this section is to place the fire risk in context, the above approach to risk assessment is subjective and for guidance only. All hazards and deficiencies identified in this report should be addressed by implementing all recommendations contained in the following action plan. The fire risk assessment should be repeated regularly.