

ABERDEEN CITY COUNCIL

COMMITTEE	Public Protection Committee
DATE	5 th December 2018
REPORT TITLE	Building Standards Activity Report
REPORT NUMBER	PLA/18/160
CHIEF OFFICER	Gale Beattie
REPORT AUTHOR	Gordon Spence
TERMS OF REFERENCE	4.1, 4.2 & 4.3

1. PURPOSE OF REPORT

- 1.1 To provide assurance and an overview of Council responsibilities in relation to securing dangerous buildings and protecting public safety, as well as activity on unauthorised building work and unauthorised occupation of buildings.

2. RECOMMENDATION(S)

That the Committee:-

- 2.1 Notes the contents of the report and Appendix.

3. BACKGROUND

- 3.1 Aberdeen City Council act as verifier to administer the Building (Scotland) Act 2003 which is intended to secure the health, safety, welfare and convenience of persons in or about buildings and of others who may be affected by buildings or matters connected with buildings. In addition, the Building Standards team complete enforcement duties under the above Act with the objective of protecting the public from harm caused by buildings.
- 3.2 Details of formal and non-formal enforcement activity can be found in Appendix 1 relating to:
- Public Safety and dangerous buildings
 - Unauthorised building work
 - Unauthorised occupation of buildings without a completion certificate
- 3.3 It should be noted that these activities do not have targets or performance measures as each case is dealt with in accordance with the Regulators Code of Conduct supported by the Building Standards Enforcement Charter.

3.4 As a result of the tragic events of Grenfell and separately, the Cole report of the Independent Inquiry into the Construction of Edinburgh Schools, Scottish Government commissioned two Ministerial Working Groups to review Building Regulation Fire Safety and secondly, Building Standards Compliance and Enforcement. The findings of these two Working Groups resulted in a formal consultation titled “Building Standards Compliance and Fire Safety – a consultation on making Scotland’s buildings safer for people”. Officers submitted a response to the consultation – see Appendix 2. The Scottish Government will review the consultation findings and release legislative changes or guidance around Spring 2019 which will be reported back to this committee.

4. FINANCIAL IMPLICATIONS

4.1 There are no increased financial implications in relation to on-going verification and enforcement services.

4.2 Any future legislative or guidance changes may increase Building Standards duties. The verification role is funded by building warrant fees and therefore should be cost neutral. Increased enforcement activity may impact on Building Standards activity and resources.

5. LEGAL IMPLICATIONS

5.1 Occasional legal input required for enforcement action.

6. MANAGEMENT OF RISK

	Risk	Low (L), Medium (M), High (H)	Mitigation
Financial	Potential increase in Building Standards activity and resources from future legislative or guidance changes	M	Any cost resulting from the increase in activity will be actively monitored and will be met through existing service budgets.
Legal	Increased legal input	L	Any cost resulting from the increase in activity will be actively monitored and will be met through existing service budgets.
Employee	Potential increase in enforcement activity	L	Any cost resulting from the increase in activity will be actively monitored and will be met through existing service

			budgets.
Customer	Delay in processing of building warrant applications.	M	Management of resources
Environment	None		
Technology	None		
Reputational	Delay in processing building warrant applications.	M	Management of resources

7. OUTCOMES

Local Outcome Improvement Plan Themes	
	Impact of Report
Prosperous Economy	Future changes to legislation or guidance may bring higher building costs.
Prosperous People	Future changes to legislation or guidance may bring higher building costs. Increased enforcement activity will make a safer environment.
Prosperous Place	Future changes to legislation or guidance may bring higher building costs. Increased enforcement activity will make a safer environment.

Design Principles of Target Operating Model	
	Impact of Report
Customer Service Design	The purpose of this report is to ensure customer outcomes are maintained and services continue. Maintain the Councils customer focus and prevent any reputational damage.
Partnerships and Alliances	The report provides assurance of the continued working with Community Safety Hub, Police and Fire Service liaison and the impact of this.

8. IMPACT ASSESSMENTS

Assessment	Outcome
Equality & Human Rights Impact Assessment	Full EHRIA not required.
Privacy Impact Assessment	Not required
Duty of Due Regard / Fairer Scotland Duty	Not applicable.

9. BACKGROUND PAPERS

None

10. APPENDICES (if applicable)

Appendix 1	Building Standards Activity
Appendix 2	Building Standards Compliance and Fire Safety a consultation on making Scotland's buildings safer for people

11. REPORT AUTHOR CONTACT DETAILS

Name:-	Gordon Spence
Email Address:-	gspence@aberdeencity.gov.uk
Tel:-	01224 522436

Appendix 1 – Building Standards Activity

Period 01/01/18 – 30/10/18	Notices served	Notices closed
Public Safety and Dangerous Buildings	5	4
Unauthorised Building Work	9	4
Unauthorised Occupation of Buildings	1	0

Number of visits resulting in formal or informal action	45 visits
---	-----------

For information – once a Notice is served, there is a statutory period of 21 days to allow an owner to appeal the notice. Thereafter, there is an expiry date by which the terms of the Notice must be met.

Of the 7 Notices not closed:

4 notices are pending approval of building warrant applications to regularise the work and are therefore in the process of being closed

1 notice the Council are making safe the building

2 notices are currently live and within the expiry period

APPENDIX 2

Building Standards Compliance and Fire Safety – a consultation on making Scotland’s buildings safer for people

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://beta.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation’s name

Aberdeen City Council

Address

Marischal College
Business Hub 4
Broad Street

Email

gspence@aberdeencity.gov.uk

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
 Publish response only (without name)
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future,

but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

No

CONSULTATION QUESTIONS

Part 1

Question 1.1:

Do you agree that the roles and responsibilities of verifiers (including their key activities) must be clearly defined and recorded, including the expected level of resources and skills needed to undertake verification activity, and the actual level?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Scottish Ministers should provide clarity through the appointment process to the expected level of resources and skills required to undertake verification activity which will be different for different verification areas. This clarity will help the Local Authority decide whether the required skill and resourcing exists or whether upscaling is required. The operating framework has gone some way to achieving this but still has a degree of vagueness. For instance, there are significant differences between verification services within a city compared to a rural authority.

Question 1.2: Do you agree that verifiers must place a greater emphasis on inspection and testing throughout construction and at completion?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: In light of recent events, it is clear that the “relevant person” and the construction industry are not putting in place sufficient supervision to ensure compliance with basic structural and fire safety construction elements are achieved. It is therefore appropriate that verifiers provide greater emphasis in key areas relating to building and occupant safety. It needs to be recognised that any additional resourcing will require additional funding.

Question 1.3: Do you agree that verifiers must place a strong focus on safety critical elements such as structure (for example wall ties, lateral restraint) and fire safety (for example fire protection, fire-stopping, cavity barriers)? If possible, please provide details, in the comments box of other elements that should be included.

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Yes. However, it may be appropriate to accept suitable confirmation if the designer has an onsite inspection role – it is important that the designer’s intent has been carried through to site construction. If the design intent is solely

left with the contractor, and/or the verifier to interpret, then there is still a risk of compliance not being achieved through lack of knowledge or misinterpretation.

Question 1.4: Do you agree that local authorities should not be able to act as verifier for their own “higher risk” building work due to possible conflicts of interest?

Please select only one answer and provide any comments in the box below.

Yes No Unsure

Question 1.5: Do you agree that local authorities should still be able to act as verifier for their own lower risk building work?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Within this local authority, there is sufficient impartiality between design teams and the verifier to ensure compliance is achieved for both high and low risk building work. However, it is accepted that this impartiality may not be particularly “visible”. Although the issues arising from recent public body developments have raised concerns for those buildings, it is assumed that this is a more endemic issue crossing both public and private sector work.

If adopting an alternative verifier for local authority work, there is a risk of that verifier not having suitable experience for the type of work involved. For example, Aberdeen City has 59 multi storey buildings whereas our next nearest verifier has no multi storey buildings. This would lead to applications being directed to a more remote verifier where the skill set exists. There are also practicality issues around the onsite verification role being completed by a more remote verifier – in the above example, the nearest verifier with multi storey buildings is 70 miles away. The potential also exists for Local Authority developments to be delayed due to alternative verification arrangements making it unfair that timescales may differ between local authority and private developments.

It seems appropriate that a separate system can be implemented to make impartiality more visible. A peer review similar to that implemented after the 2005 Act came into force could be developed to cover the competent checking of approvals and sample checking of work during construction – record of site notes, photos and other evidence gathered to reduce the risk of non-compliance and confirm the correct implementation of the Compliance Plan.

Question 1.6: Do you agree that the roles and responsibilities of building owners and developers (including their key activities) must be clearly defined within the Building Standards system and recorded including the expected level of resources and skills needed to assure themselves and verifiers of compliance, and the actual level?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: It can be very difficult for the verifier to ascertain the level of competence assigned by the owner/developer to ensure the risk of non-compliance is reduced. For example, in a recent private development involving a conversion to a high risk building, it was found late in the construction work that the electrician was unable to issue suitable certification under BS7671 due to a lack of qualifications. It is clear that the level of resources employed by developers on supervision varies considerably but has definitely reduced over the years. Consideration should be given to the mandatory employment of competent supervision by the developer depending on the risk category of buildings and their occupants.

Question 1.7: Do you agree that the building owners and developers must, to ensure compliance, place a greater emphasis on inspection and testing throughout construction and at completion, with focus on the safety critical elements?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: For the reasons described in the comments to question 1.6 above.

Question 1.8: Do you agree with the requirement for a Compliance Plan, to be provided by the owner or developer, to demonstrate their approach to compliance from initial design, through detailed design and construction, and leading to their final sign-off and certification of the completed building?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This is an important element for high risk buildings to ensure compliance and for high value buildings to reduce the risk of retrospective works and therefore provide value for money in both public and private developments. It is considered necessary that the Compliance Plan must be embedded as a mandatory requirement so that, similar to CDM Regs, it becomes part of the costed process for the delivery of buildings.

Question 1.9: Do you agree that the building owner or developer should be required to appoint a competent professional person, with the appropriate experience and qualifications, to act on their behalf in order to assure them of compliance when they submit the completion certificate?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Agree on the basis that this should not reduce the enhanced role of the verifier as discussed in question 1.2. The combination of a developer appointed competent person and an increased inspection role for the verifier can only enhance compliance in the constructed building.

Question 1.10: Do you agree that mandatory pre-application discussions and pre-commencement of construction discussions should be introduced for higher risk buildings?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This will ensure discussions between designer, contractor and verifier take place to ensure design intent is carried through to construction compliance

Question 1.11: Do you agree that amendments to warrant should differentiate between minor changes, major changes, and staged warrants?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The current legislative framework and enforcement does not suit the delivery needs for larger developments. It is unrealistic to expect construction work to stop and await a pre-emptive amendment approval when an unforeseen or client led change is necessary. Equally, both the developer and verifier must be comfortable that design and construction compliance will still be achieved should work continue without formal approval. Since 2005, this local authority has adopted a pragmatic approach when changes occur and enforcement has only been used when safety concerns are identified. The proposed certification of amendment scheme appears to go a long way to formalising the process.

1. Construction (procedures throughout construction)

- Construction procedures and guidance to be reviewed and strengthened for higher risk buildings to cover notifications, inspections, disruptive surveys and recording non-compliances.
- Design changes to be notified to the verifier as the project progresses and subsequently covered by an amendment granted before the completion certificate is submitted.

Question 1.12: Do you agree that the construction procedures and guidance should be reviewed and that mandatory notifications are introduced, including notification of progress on higher risk projects?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The establishment of a Compliance Plan should be made mandatory but the content of the Plan should be left to the developer and verifier to agree the key inspections which will vary between developments.

Question 1.13: Do you agree that verifiers should carry out ad-hoc (unannounced) progress inspections and be able to require disruptive surveys when mandatory notifications are not made to them?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: No further comment required

Question 1.14: Do you agree that verifiers should record safety critical building standards non-compliances and feedback at a national level to drive improvements?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Whilst identifying safety critical non-compliances will be helpful, the reality of consistently recording this information across Scotland will be difficult. It may prove too subjective, it will vary between rural and city authorities and will vary depending on the number of site visits. It will also place an additional burden on the verifier.

Question 1.15: Do you agree that verifiers should be notified of minor changes in design as the project progresses, on the understanding that they are to be covered by an amendment to warrant before the completion certificate is submitted?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Yes, as per the comments to Question 1.11 above, this appears a pragmatic approach for administering minor changes.

Question 1.16: Do you agree that the completion certificate for a higher risk building should have sub-sets for safety critical aspects, and be accompanied by as-built drawings and the completed Compliance Plan?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: If the Compliance Plan is legislatively linked to the Acceptance to a Completion Submission then it will include the safety critical sub-sets and act as a record of compliance for future reference.

Question 1.17: Do you agree that the procedures for the temporary occupation or use of a building should be strengthened for example requiring a declaration of compliance and monitoring of the expiry dates?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The temporary occupation is a simple application form which requires no declaration relating to compliance from the relevant person. This is considered to be a legislative weakness in the process whereby the verifier appears to be responsible for confirming the safe occupation of a building based on the granting of a temporary occupation certificate. More responsibility should be placed on the developer to confirm that compliance has been achieved and the building is therefore safe to occupy.

Question 1.18: Do you agree that restrictions to the occupation or use of existing buildings should be considered when significant alterations are being carried out to higher risk buildings?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The Act only requires a completion certificate or temporary occupation to confirm occupation in new build development. Alterations during occupation present a different and sometimes larger risk to safe occupation. For example, alterations in a care home where vulnerable residents reside requires careful consideration of all risk factors and indeed, may require the decant of residents if the risks are too high. Another example might be that contractors require to use an escape stair for construction access and the stair is compromised through fire doors being wedged or the storage of materials. The legislative backstop in these cases sits in the Fire (Scot) Act 2005 and it may be appropriate for Building Standards to collect a occupation risk assessment as part of the warrant approval which can be passed to the Fire Service similar to a Fire Safety Design Summary.

Question 1.19: Do you agree that local authorities should be more pro-active in enforcing building regulations and monitor construction regularly?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Enforcement should be appropriate and in accordance with guidance provided by the Scottish Strategic Regulators Code of Practice. Currently, the consensus is that enforcement is resource intensive with an unknown success rate. Local Authorities therefore enter negotiation to achieve the best outcome. Where there is a need to enforce due to real safety concerns, the current route can be slow and cumbersome. In general, quicker powers should be granted to stop work and/or occupation where the Local Authority considers safety and lives are endangered. This is similar to the Health & Safety Executive.

Question 1.20: Do you agree that local authorities should have a building standards enforcement policy in place that is based on national guidance?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This will provide national consistency which is especially important for national companies carrying out work across Scotland.

Question 1.21: Do you agree that national guidance on building standards enforcement should include what enforcement related actions local authorities should carry out and the level of resources and skills they should have to do so?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: National guidance will help national consistency. However, Local Authorities should be free to prioritise resources across the range of functions they deliver

Question 1.22: Do you agree the penalties and levels of fines associated with serious failures in compliance should be increased?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Fines should be increased but proportionate to the type of development which will then act as a suitable deterrent.

Fire Safety

Question 2.1: Do you agree that the guidance should be developed to make clear that there is more than one way of achieving compliance with the mandatory functional standards?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This is already suitably covered in the Technical Handbooks

Question 2.2: Do you agree that the annexes in the Technical Handbooks for residential care buildings, hospitals and enclosed shopping centres should be published separately?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: It is better the annexes are published within the Technical Handbooks and not separately. It makes the annexes more visible.

Question 2.3: Do you agree that an additional Technical Handbook for simple domestic detached and semi-detached dwellings (up to 3 storeys) should be introduced as a means of compliance with fire, and all applicable building standards and sections of the Handbooks?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This appears to be appropriate as a high percentage of building warrant applications fall into this category.

Question 2.4: Do you agree that a national “hub” approach should be developed to share expertise and skills and be responsible for verifying fully performance based “fire safety engineering designs”?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Questions remain around the funding of a hub, potential disruption to turnaround timescales if utilising a hub and how design intent is passed to the verifier to confirm construction compliance.

Question 2.5: Do you agree that consideration should be given to a certification scheme for fire engineering?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Yes, if it is as robust as the SER scheme for structural engineering certification

Question 2.6 Do you agree that the reference to British Standards Reaction to Fire Tests should be removed from the Technical Handbook?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This local authority is in agreement with the findings of the review panel

Question 2.7: Do you agree that only A1 and A2 materials, using the European Harmonised “reaction to fire tests”, should be required for external walls or insulation exposed in a cavity of a high rise building (domestic and non-domestic) with a storey at a height of more than 11m above ground?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Clarity required for the description of materials between fire resistance, combustibility and surface spread of flame. If possible, simplification is required to be more understandable to common person and the building industry.

Question 2.8: Do you agree that only A1 and A2 materials, using the European Harmonised “reaction to fire tests”, should be required for external walls or insulation exposed in a cavity of entertainment and assembly buildings, residential care homes and hospitals of any height?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: This local authority is in agreement with the findings of the review panel

Question 2.9: Do you agree that BS 8414 (and BR135) may still be used as an alternative method of providing evidence to show compliance?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Difficulties of testing a part/sample of building may not replicate the difficulties of re-cladding a whole building. Testing does not take account of environmental conditions, wind, add on fixings, etc or particular detailing which may differ depending on the building being re-clad. However, testing to BS8414 is still better than nothing.

Question 2.10: Do you agree fire service activated evacuation sounders should be required in each flat in new domestic buildings which have a storey at a height of more than 18m above ground level?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Why 18 metres and not 11 metres – the application of different height allowances can cause confusion for designer and general industry. It is better to simplify where possible. There are concerns that a simultaneous evacuation may hinder fire fighting operations so consideration should be given to a phased evacuation via “intelligent” system but still in the control of the Fire Service. Concerns exist should it be the intention to place the evacuation sounders within flats due to access difficulties for maintenance. For this reason, it would be better to site the sounder within the common corridors with suitable audibility.

Question 2.11 Do you agree that two stairways should be required for new domestic buildings which have a storey at a height of more than 18m above ground level?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Consideration should to lowering the trigger for 2 stairs even lower. For example an office requires 2 escape stair if it has a storey greater than 7.5m. Although, an office has less compartmentation, occupants are awake whereas, a flatted development includes a sleeping risk. However, should automatic suppression be introduced as a mandatory requirement, then the requirement for 2 means of escape can be relaxed.

Question 2.12: Do you agree that new HMOs used for “care” 24/7 should be included in the list of buildings with a mandatory requirement for automatic fire suppression systems?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Simply due to the vulnerability of the occupants

Question 2.13: Do you agree that new HMOs with 10 or more occupants should be included in the list of buildings with a mandatory requirement for automatic fire suppression systems?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Simply due to the potential vulnerability of the occupants

Question 2.14: Do you agree that new flats should be included in the list of buildings with a mandatory requirement for automatic fire suppression systems?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Yes, but only to buildings with flats containing a storey above 11 metres. Above this height, the Fire Service is restricted to firefighting operations purely via internal means of access. Up to 11 metres, external access can be gained as long as this is designed as part of the development.

Miscellaneous

Question 3.1: Do you agree that protected lobbies need not be provided to shared residential accommodation with only one escape stair?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Yes, but subject to other mitigation factors such as enhanced Alarm & Fire Detection.

Question 3.2: Do you agree that exempt type 16 of building regulations should be reviewed in respect of the criteria for the erection of a temporary building and the temporary use of a building?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The wording of the exempt class requires greater clarity and currently causes confusion in their application

Question 4.1: Do you agree with the areas identified for further consideration?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: Fee income stayed static between 2005 and 2017 making it impossible for verifiers to provide the same level of service due to inflationary rises. Investment in resources was reduced accordingly and greater prioritisation was given to plans checking. Regular review of fee income is required if verifiers are to continue to provide the same level of service consistently. Clearly, if increased inspection work via Compliance Plans and greater use of enforcement is an outcome of this consultation, then this needs to be recognised in the fee structure. A scheme of licensing contractors will enhance construction compliance but requires to be a robust scheme of membership, auditing, etc to be of value.

Question 4.2: Do you consider there are other areas of the building standards system that require further consideration?

Yes No Unsure

Please select only one answer and provide any comments in the box below.

Comments: The upskilling and upscaling of verification services will take some time to implement before an further consideration is given to changes in the building standards system.

Question 4.3: If Yes above please tell us what they are in the box below.

Comments:

Question 5.1: Are there any proposals in this consultation which impact or have implications on 'equality groups'? Choose from the following options:

Part 1 – Building Standards (Compliance and Enforcement)

Yes No Unsure

Please select only one answer and provide any comments in the boxes below.

Verifiers

Comments:

Building Owner or Developer

Comments:

Compliance Plan

Comments:

Building standards system

Comments:

Enforcement

Comments:

Part 2 – Building Standards (Fire Safety)

Question 5.2: Are there any proposals in this consultation which impact or have implications on 'equality groups'? Choose from the following options:

Yes No Unsure

Please select only one answer and provide any comments in the boxes below.

Structure of building standards and supporting guidance

Comments: No comment

Fire safety engineering

Comments: No comment

External walls and cladding

Comments: No comment

Escape

Comments: No comment

Automatic fire suppression systems

Comments: N comment

Question 5.3: Do any of the proposals in this consultation have any financial, regulatory or resource implications for you and/or your business (if applicable)? Choose from the following options:

Part 1 – Building Standards (Compliance and Enforcement)

Yes No Unsure

Please select only one answer and provide any comments in the boxes below.

Verifiers

Comments: Upskilling and upscaling resources will have a financial impact. Greater investment in training in verification and/or enforcement has a time and financial impact.

Building Owner or Developer

Comments: Potentially increased cost implications for new build flats in Council ownership

Compliance Plan

Comments: Potentially increased cost implications for administering the Compliance Plan through additional supervision costs and employment of a competent person to oversee

Building standards system

Comments: No comment

Enforcement

Comments: Greater investment in training in verification and/or enforcement has a time and financial impact.

Part 2 – Building Standards (Fire Safety)

Question 5.4: Do any of the proposals in this consultation have any financial, regulatory or resource implications for you and/or your business (if applicable)? Choose from the following options:

Yes

No

Unsure

Please select only one answer and provide any comments in the boxes below.

Structure of building standards and supporting guidance

Comments: No comment

Fire safety engineering

Comments: Potential funding of a hub for fire engineering

External walls and cladding

Comments: No comment

Escape

Comments: Potentially increased cost in new build flats for means of escape and passive systems

Automatic fire suppression systems

Comments: Potentially increased cost in new build flats