

# MAYOR OF LONDON

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## Response to Emergency Evacuation Sharing Information Consultation

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### Summary

The Mayor of London reiterates his view that legislating for Personal Emergency Evacuation Plans (PEEPs) in all buildings of any height covered by the Fire Safety Order, and providing central funding, is the only way to ensure there is comprehensive and consistent implementation across the entire country.

The proposals set out in this consultation on Emergency Evacuation Sharing Information (EES) amount to little more than a watered-down version of PEEPs. The Mayor has identified several of limitations to the EES proposals and has detailed them below.

Government's ongoing failure to implement this recommendation from Grenfell Tower Inquiry is disappointing and concerning. Government must ensure that the recommendations from the Grenfell Tower Inquiry do not become a missed opportunity for change, as was the case after the Lakanal House fire.

Five years on from the Grenfell fire, the Mayor pays tribute to the bereaved and survivors who are campaigning for change so that a disaster like Grenfell never happens again.

### Response to consultation

Following the tragic loss of life in the fire at Grenfell Tower, in which 41 per cent of residents with disabilities died, the Grenfell Tower Inquiry recommended that owners and managers of every high-rise residential building be 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).

Given that 83 per cent of respondents to the original PEEPs consultation in 2021 supported the proposal, it is clear that there is significant demand for this recommendation to be implemented in full.

The Mayor is pleased to read that a working group of disabled groups and housing providers is being set up by government and would stress that the group membership must be diverse and reflect all views, including those who would benefit from PEEPs. It is vital that the working group considers and establishes the best way to implement PEEPs in practice.

While the call for evidence on PEEPs is welcome, government should also be conducting pilot schemes and undertaking research to make a more informed assessment of PEEPs in residential housing. The Mayor hopes that this would lead government to reconsider its latest position. Following a commitment to implement PEEPs fully, the evidence collected from this process could then inform a nationwide protocol, guidance and training on how the housing and development sector could implement the requirements of any legislation on PEEPs.

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The Emergency Evacuation Information Sharing (EEIS) consultation released on 18 May 2022 proposes alternative measures to protect the fire safety of residents who would need support to evacuate in an emergency. This proposal differs from PEEPs in a number of key ways. First, it only focuses on residents who are mobility impaired as opposed to those with other physical or cognitive impairments. Second, it only applies to buildings with a simultaneous evacuation strategy and not buildings with a stay put strategy. Third, it proposes five steps that involve conducting a Person Centred Fire Risk Assessment (PCFRA) as opposed to a PEEP, and then sharing information with the local Fire and Rescue Service (FRS). Fourth, it relies on the FRS to conduct rescues of those who would be unable to self-evacuate.

## 1. Scope

The Mayor is concerned that EEIS only focuses on residents that are mobility impaired and urges government to take a more inclusive approach. People who may be unable to self-evacuate include those with mobility issues but also those with other physical and cognitive impairments which may be permanent or temporary.

## 2. Building fire strategy

The Grenfell Tower Inquiry recommended PEEPs for all high-rise residential buildings and government consulted on that proposal on 8 June 2021. Government is now proposing to introduce EEIS – a watered down version of PEEPs – only for buildings with a simultaneous evacuation strategy in place. Under these proposals, those buildings with a stay put policy in place would not be required to provide EEISs for relevant residents. It is welcomed that government has moved away from using height as a distinguishing factor, but the new categorisation of fire strategy cannot be the correct approach either. A resident affected by smoke or fire must have a plan and means to get to a place of safety, regardless of whether the building has a stay put or simultaneous evacuation policy.

Grenfell Tower was a building with a stay put policy and 72 people lost their lives. The Grenfell Tower Inquiry Phase 1 report recommended government develop national guidelines for evacuation of high-rise buildings as a result. It is clear that stay put cannot be the only strategy and all buildings must have a Plan B so that residents can evacuate to a place of safety if stay put is no longer viable.

Since Grenfell, countless buildings have been found to have fire safety defects and have therefore been forced to change their fire strategy to simultaneous evacuation until remediation is complete. Linking EEIS to buildings with simultaneous evacuation risks suggesting building owners can retire EEISs once the building has been remediated. That was never the intention of the Grenfell Tower Inquiry recommendation around PEEPs.

## 3. Person Centred Fire Risk Assessments (PCFRAs)

A PCFRA is a risk assessment that helps identify residents who are at higher risk from fire in their own flat. It differs from a PEEP in that it is not a bespoke escape plan to assist residents who may have difficulties in evacuating a building unaided during an emergency.

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The EEIS consultation proposes a process whereby the Responsible Person (RP) offers a PCFRA to residents who self-identify as requiring assistance to self-evacuate and then connects them with the local FRS to arrange a home fire safety visit.

The Mayor is content with the proposed reliance on self-identification but notes that its success relies on proactive communications from the RP. These communications should encourage residents to consider whether they need support and inform them of their rights.

PCFRAs will help identify residents who are at higher risk from fire in their own accommodation and measures such as fire-retardant bedding and fire safe ashtrays can be put in place for them in their homes. While PCFRAs are welcome and indeed already being undertaken now by some RPs, they focus on reducing the probability of fire inside someone's flat and, unlike a PEEP, they do not incorporate an evacuation plan.

## **4. Reliance on FRS conducted rescue**

The consultation makes the following argument against PEEPs: 'the time between a fire being reported and the FRS mounting their operational response at the scene is the period in which a PEEP would be enacted. In a residential setting, there will inevitably be a limit as to what could be safely achieved by a single staff member or even a small team regarding support to mobility impaired residents in advance of the FRS attending with a greater number of competent, trained personnel.' In other words, government is claiming there is insufficient time for a PEEP to add value and that FRS conducted rescue is always preferable.

The Mayor does not agree with this view for two reasons. First, the time that FRS takes to arrive at an emergency may be quick, but the time taken to actually set up a bridgehead, hoses and get into a position to fight fire and rescue residents in tall buildings is far greater. In reality there is more time for a PEEP to be effective than government is suggesting.

Second, expert evidence in the Inquiry has underscored the importance of timely evacuation to avoid serious and potentially fatal smoke inhalation. This highlights the risk inherent in the EEIS approach which relies solely on FRS conducted rescue instead of supporting self-evacuation.