

MAYOR OF LONDON

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Response to Personal Emergency Evacuation Plans consultation

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Summary

The Mayor welcomes the government consultation on Personal Emergency Evacuation Plans (PEEPs). The proposals are a positive step towards providing protection and reassurance for residents who would be unable or find it difficult to self-evacuate. However, more clarity is required on how PEEPs will work in practice and there are some aspects where the proposals should be expanded:

- The legal right to PEEPs should be extended to residents of all buildings covered by the Fire Safety Order, irrespective of height.
- The costs of PEEPs should not be passed onto residents either directly or indirectly. A central Government fund should be established to cover costs.

Since the Grenfell fire and tragic loss of 72 lives, more action is required to ensure that everyone is safe in their homes. Many of those who died in the fire were unable to self-evacuate due to disability or mobility issues. The Grenfell Tower Inquiry Phase 1 report recognised that PEEPs are needed in high-rise residential buildings for the safety and protection of residents whose ability to self-evacuate may be compromised. The Mayor supports the proposed introduction of PEEPs in high-rise residential buildings and is committed to doing everything in his power to ensure the Grenfell Tower Inquiry Phase 1 recommendations are implemented.

The Mayor is also committed to creating a more equal and integrated city for all Londoners. The London Plan highlights the importance of new developments being accessible to all and requires that the highest standards of accessible and inclusive design be met, as well as that building designs support the safe and dignified evacuation for everyone regardless of their disability status.

The Mayor commends the Grenfell bereaved and survivors who are continuing to campaign for public safety so that no other family has to endure what their families did. The Grenfell fire has shown that long-lasting systemic change is sorely needed, and the Mayor is committed to working with Government to achieve this.

Response to consultation

The Mayor agrees with the provision of PEEPs and with the main thrust of the proposals but wishes to provide comments and propose reconsideration in the following areas.

Built environment

The Grenfell fire, and subsequent fires, have shown the importance of the built environment meeting the highest possible safety standards. The Mayor welcomes the recent introduction of the Building Safety Bill in Parliament and the establishment of a new Building Safety Regulator. The

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Mayor does however reiterate his call to extend the ban on combustible materials to all buildings regardless of height or use.

The Mayor has long supported the London Fire Brigade's campaign to increase the use of sprinklers and other automatic fire suppression systems. These systems have a proven record of saving lives, protecting residents, reducing property damage, controlling the spread of fire and giving extra time to facilitate evacuation. They provide an effective additional layer to the active and passive fire safety measures of a building.

The requirement of PEEPs cannot simply be seen as a tick box exercise but must be part of a wider strategy to reform the built environment and improve the overall safety of buildings for all residents, including those with disabilities.

Building height

Although the Grenfell Inquiry recommendation specified that PEEPs should be introduced for residents of high-rise buildings, the Mayor believes the legislation should protect all residents in all buildings who would be unable to self-evacuate regardless of building height. The Mayor is encouraged to note that the consultation has specifically requested responses from residents residing in buildings under 18m in height. Listening to the experiences of residents who require PEEP's is crucial and disability related factors must be at the forefront. For example, a resident on the second floor of a building would have difficulty self-evacuating in a fire, no matter the height of a building.

Self-identification

It is difficult for the onus to self-identify as requiring a PEEP to lie squarely with the resident as they may not be aware of their rights. Raising awareness of residents' rights to PEEPs is vital, and the Responsible Person under the Fire Safety Order must take the leading role in this and ensure they do so in multiple accessible ways; for example, using various methods of communication and different languages where required. It is imperative that the Responsible Person has an accountable, open and transparent relationship with residents. Only then is it reasonable for the onus to fall on residents to self-identify, alert their Responsible Person that they need a PEEP, and keep their PEEP updated as and when circumstances change. The Mayor believes this is a situation where action will be required from both parties.

Premises Information Box

There needs to be a consistent approach to the development of PEEPs across the country and across all buildings. Templates for PEEPs and the information stored in secure premises information boxes, as suggested in the consultation, are necessary to facilitate this. However, the information stored in premises information boxes must clearly set out residents' physical capabilities and practical barriers to evacuation. The PEEPs templates must be accompanied by detailed guidance including example case studies covering a wide range of scenarios.

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In answer to the consultation question on how often the PEEP should be reviewed, the Mayor is of the view that information must be updated as and when there is a change in circumstances and reviewed every 12 months.

Cost and resourcing

Serious consideration must be given to the costs and resources necessary to implement PEEPs effectively. As well as the costs of producing the plans, subsequent costs may arise to install and manage equipment and fire safety measures to assist a safe and dignified evacuation. The Mayor firmly believes that costs must not be directly or indirectly passed onto residents who require PEEPs or indeed to other residents. Disabled groups have genuine concerns that passing the costs of PEEPs onto other residents will lead to them being discriminated against. The Mayor calls on Government to explore the possibility of introducing a new specific fund to cover the costs of introducing PEEPs and mitigate the risk of potential discrimination.

The Mayor has long advocated for the government to explore more long-term and sustainable funding sources to respond to the building safety crisis. The policy on PEEPs is part of the response to the crisis, and the government must account for this when introducing new funding sources in the future.

Enforcement and redress

The consultation is silent on the point of dispute resolution, redress and enforcement. Where there are disputes between residents and the Responsible Person, there must be a simple process to raise complaints and achieve resolution. One of the existing regulator or ombudsman services may be appropriate, provided that there is a simplified and clear process for redress that operates across tenures.

Lastly, the government needs to be deliberate on how it will monitor Responsible Persons' duties in raising awareness of PEEPs. For residents to request PEEPs, they must first be aware of their right to have one. Without clear enforcement mechanisms, it will be difficult to ensure the policy on PEEPs is reaching its intended outcomes.