Your ref:		
My ref:	AC-8	
Date:	3rd June 2025	Tel: 020 @outlook.com
M Edgware LONDON		
Dear	,	

Barnet's Letter 12

- 1 I have now read Letter 12 and the associated four-page Pre-Inspection Survey Guide.
- 2 On page 3 of Letter 12, under "step 3 ... Option 1" there is the statement: "*The specification for the works including photos of properties with completed fire breaks are on our website*" but no link is given and I do not know which properties are illustrated. The document "Fire safety for timber-framed homes Information for freeholders" (available at http://bit.ly/4gaAVxg) contains the specification for the fire-break works at properties in Burnt Oak. On the same page, it includes two hyper-links, one to a Capital PCC drawing (1158-AL-0-D11) of the proposed fire stopping under the wall cladding, the other to a four-page document "Fire stopping detail for Archetype 1 Timber Framed Houses". This latter document includes photographs of work undertaken at Playfield Road and shows a messy detail that is not in accordance with either the specification or drawing D11.
- 3 The work shown for Playfield Road would not meet the recommendations of Approved Document B to the Building Regulations in respect of the combustibility of the cladding within 1 metre of the property boundary. Furthermore, I do not consider that the fire-stopping provides a benefit commensurate with its cost. Barnet has never presented any evidence to show that there was any actual fire-spread at Moss Hall Grove via the gap between the inner face of the cladding and the edge of the party wall or, indeed, that there were unobstructed gaps at this location.
- 4 The four-page illustrated document does not show the installation of wall insulation, nor does it show what fire-stopping work was carried out at roof level.
- 5 Letter 12 refers to other possible remediation options being available on their website (without giving the links). I have already expressed my doubts in respect of misting systems see my letter AC-6 dated 29th January 2025.
- 6 Turning now to the Pre-Inspection Survey Guide. The section titled "Property" on page 1 includes the passage: "If your house is positioned between two council houses ... the risk of external spread of flames will be removed due to the works undertaken to the Council owned houses". This makes no sense. If the works are carried out in accordance with the specification, the existing cladding will be put back in place once the fire-stopping has been

fitted at the line of the party wall. Consequently, the cladding will be the same as before and the risk of fire spreading externally across its outer face will be unchanged.

- 7 I agree with the section on smoke detectors but I would add that there should be a rehearsed plan for what each member of the family should do in the event of an alarm sounding. If the front and rear doors are routinely dead-locked, there should always be a key located nearby.
- 8 The sections on electrical installation and consumer units are muddled. Residual current devices detect the leakage of current to earth due to faulty insulation and thus protect against electrical shock. They provide no protection against overloads and are not intended to do so. The type of plastic used for consumer units is a fire-retardant grade and will not burn readily. Metal consumer units contain plastic components but again, these do not burn readily. The material used for the casing of the consumer unit has no bearing on whether there will be electrical overloading: this depends mainly on the current-carrying capacity of the cables in the circuit. Limited ventilation tends to restrict, not increase, the risk of fire-spread. However, ventilation in these situations is likely to be sufficient for fire growth.
- 9 No mention is made of the electricity supplier's equipment, which includes the incoming cable, cut-out fuse and meter. In my experience, the most common cause of fires originating in electrical supply equipment is over-heating and eventual electrical breakdown of the cut-out fuse. (This is situated between the supply cable and the meter and is usually in a black plastic housing secured by a wire fitted with a tamper-evident lead seal.) Electricity suppliers do not routinely inspect or renew cut-out fuses and supply cables, normally only taking an interest when they fail. These items may well be those installed when the house was built.
- 10 The section on sockets is generally sensible although I think that few houses will have the large number of sockets suggested by the guidance documents.
- 11 I agree that heat from halogen downlighters can start fires. In particular, their installation in a ceiling below a loft space used for storage is hazardous since combustible goods might end up directly over a downlighter.
- 12 I strongly disagree that windows should be relied on as a means of escape. Instead, there should be smoke detectors to give a timely warning of an outbreak of fire and an agreed plan of action that involves escape down the stairs and out the front or back doors. In the unlikely event that this escape route is impassable, for instance because someone has poured petrol through the letter box and lit it, windows might be the last resort. However, standard modern window hinges cause one side of the window to slide across the opening as the window is opened. This action allow access to the outside of the window for cleaning but severely restricts the size of the opening through which escape could be made. Fire escape hinges which overcome this problem are readily available but retrofitting would probably have to be carried out by a specialist window fitter. Smashing out a fixed pane might provide a large opening but breaking a double-glazed unit is difficult. Even if escape can be made through a first-floor window, there is a significant risk of injury involved in falling to the ground below. The availability or otherwise of "escape windows" was not considered in the sample HHSRS surveys carried out by Barnet.
- 13 The comments regarding fan and convector heaters strike me as being a bit "nanny state". These items are safe if used properly. Barnet makes no mention of a more common cause of fires, namely misuse of candles and tea-lights

- 14 Whilst substantial closed doors will hold back fire and smoke, there is no legal requirement to fit doors for this purpose in two-storey housing. Ensuring that a door will be closed in the event of a fire requires the provision of a self-closer and most residents would consider this unacceptable. Replacing a light-weight door with a solid-core door is pointless if no provision is made to ensure that it is likely to be in the closed position in the event of a fire.
- 15 I think the HHSRS system of assessing the likelihood of a fire causing harm is illogical and too subjective. It can generate likelihoods that seem too high but conversely the assessment survey does not attempt to include the risk of non-accidental fires, even though the statistics quoted in the HHSRS operating guidance suggest that 20% of dwelling fires reported to fire brigades were non-accidental. Criminal activity can result in a very high risk of fire and harm. For instance, ethnic tensions or a family feud might put a household at a very high risk of a severe fire intended to cause harm. Whilst the family and neighbours might be aware of the situation, as far as I am aware, it would not be identified by an HHSRS survey. Tragically, there are a number of deaths each year from targeted arson attacks.
- 16 The HHSRS surveys are intended to assess the likelihood of a fire causing harm that warrants medical attention, rather than simply the likelihood of an outbreak of fire. The fire at Moss Hall Grove was clearly serious and potentially dangerous but, in the event, there were no casualties. As such, it would presumably not be considered as a fire causing harm under the Housing Act 2004 unless the loss of one's home.is considered a trauma warranting some form of therapy.
- 17 The HHSRS surveys assess both the likelihood of a fire causing harm and also the likely severity of the harms caused (referred to as "spread of harms"). Some potential hazards are considered at both steps and I consider that this could give rise to a higher overall hazard score than might be reasonable.
- 18 For instance, the lack of a functioning smoke detector is not going to influence whether or not an unwanted ignition occurs. However, if such an ignition does occur, in the absence of a working detector there will be no early alarm and the ignition is more likely to grow into a serious fire. It is therefore reasonable to increase the spread of harms rating. However, the HHSRS methodology seems to require that, in the absence of a working smoke detector, the predicted frequency of fires also be increased since it is more likely that an unwanted ignition will turn into a fire causing harm. Whilst I can see some justification for this, care must be taken to ensure that the predicted number of fires causing harm does not exceed the probability that there will be an ignition in the first place. Similar arguments apply to other perceived hazards such as cladding, the lack of cavity barriers and the quality of internal doors.
- 19 The average likelihood of fires given in the HHSRS Operating Guidance was based on statistics from 1997 to 1999. In 1999, fewer houses would have had an adequate number of functioning smoke detectors than today. Consequently, when the presence of functioning smoke detectors is noted in an HHSRS survey, this should be considered to reduce the likelihood of an occurrence.
- 20 In respect of archetype 1 houses, the HHSRS Operating Guidance gives the likelihood of a fire causing harm in this age of house as 1 in 6248 per year. The guide presents likelihoods in bands (scale points) and this type of house would fall in the likelihood band of 1 in 5600 (the lowest). Mr Lord, in his HHSRS assessment, increased the likelihood by six scale points to the 1 in 180 band, a 35-fold increase in frequency over the statistical likelihood quoted in

the guidance. He also increased the probability that any such occurrence would cause serious harm (the spread of harms) by one scale point. His hazard calculation (which contains a typo) gives a total score of 1328, well above the threshold of 1000 for a category 1 hazard.

21 The total score is more dependent on the likelihood of an occurrence than on the outcome. For instance, if the likelihood is increased by 2 scale points (from 1 in 5600 to 1 in 1800, a threefold increase) but it is considered that all occurrences will be fatal (100% spread of harms to a Class 1 outcome), the total score would be 555 and so not a category 1 hazard. Clearly this spread of harms is not realistic in respect of fires; the example is given only to illustrate the importance of assessing an accurate likelihood of an occurrence causing harm in order to calculate a useful hazard score.

Do not hesitate to contact me if you feel that I need to clarify anything or you wish to raise further points.

Yours sincerely,

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