

## Action Plan for Safer Buildings in Wales.

### Overview:

This White Paper sets out proposals for comprehensive reform of legislation that contributes to building safety in Wales. It focuses on legislative change across the lifecycle of buildings as well as setting out aspirations for culture change in the way buildings are designed, constructed and managed.

### The Scope of the Building Safety Regime:

The Building Safety Regime covers all multi-occupied residential buildings. By multi-occupied residential building we mean any building where there are two or more dwellings, regardless of whether there is a shared front door to the building. This means that the scope of the regime would capture a house converted into two flats, a licensed HMO through to a high-rise apartment block.

### **Option A: Two Categories of Risk**

There are two categories of building set out in the Building Safety Regime:

- Category 1 – these buildings would be subject to the most onerous requirements of the Building Safety Regime. These buildings will be 18m or more in height or more than 6 storeys and contain two or more dwellings. For example, a 7-storey block of flats used for student accommodation; or an 8-storey block of leasehold properties; or a mixed use 13 storey building with 4 floors of flats.
- Category 2 - these buildings would be subject to numerous requirements of the Building Safety Regime. These buildings will be residential properties with two or more dwellings that are no more than 18m in height. For example, this category could range from a house converted into two flats; a licensed HMO; to a 5-storey purpose-built block of flats; or a 4-storey office block converted into flats.

Warwick currently have **5** sites that would fall into **Category 1** and 31 that fall into Category 2. These figures do not include the number of blocks within those sites that would fall into Category 1.

### **Option B: Three Categories of Risk**

Below is an indication of the types of buildings that might fall within these categories:

- Advanced – these buildings will be subject to the most onerous requirements of the Building Safety Regime. These buildings will be 18m or more in height or more than 6 storeys and contain two or more dwellings. For example, a 7-storey block of flats used for student accommodation; or an 8-storey block of leasehold properties; or a mixed use 13 storey building with four floors of flats.
- Enhanced - these buildings will be subject to numerous requirements of the Building Safety Regime. These buildings will be properties with four or more dwellings and that is no more than 18m in height. For example, this category could range from a house converted into seven flats; a licensed HMO with six bedrooms; a 5-storey purpose-built block of flats; or a 4-storey office block converted into flats.
- Standard – these buildings will be subject to the least onerous requirements of the Building Safety Regime. These buildings will be properties with 5 or fewer dwellings within a single

property, for example a house that has been converted into two flats, or a licensed HMO with 5 bedrooms.

The majority of Warwick's portfolio would fall into the Enhanced Category based on sites only (5 sites in Advanced).

Warwick have no preference to the Options A or B.

### **During Design and Construction**

Warwick Estates do not get involved at the Design and Construction stage. If Warwick was to be involved, then the necessary steps would take place to ensure the procedures are followed and ensure involvement with the local building control.

### **Dutyholders during Design and Construction**

Warwick Estates would not expect to take any of the roles for Dutyholder at this stage.

### **Gateways and Building Control Bodies**

Warwick Estates would only expect to be involved at the Gateway 3 Stage (shortly before the building's occupation). Inspections would be carried out to ensure Warwick are happy with occupation and necessary works are completed.

### **Golden Thread**

Warwick Estates already has a system that is being developed and additions made to cope with the Golden Thread content. This is an online system that Regulators could be given access to. All steps would be taken by Warwick to ensure that when taking on a newly constructed site, the necessary information is handed over to store for the Golden Thread.

Golden Threads for existing buildings, both Category 1 and Category 2, is already being worked on.

### **During Occupation**

As already mentioned, it is rare that Warwick are involved at his stage, but plans will be put in place to ensure building safety before occupation including fire risk assessments and a review of the documentation provided.

### **Dutyholders during Occupation**

Warwick's stance on the Building Safety Manager who would potentially responsible during this stage is not yet confirmed. Current ideas that a Building Safety Manager will manage between 7-10 buildings is seen as impractical. One site can have as many as 36 blocks within our portfolio, that could mean 4 Building Safety Manager just for that one site. This would mean a minimum of 4 new staff just for a portfolio of 36 sites, this is not considering the number of blocks with 3 sites have more than 10 blocks. Who will cover these costs for additional staff and how can 4 new Building Safety Managers be found, when research has shown there are no professionals that currently match the (English) Governments ideas for competency levels.

### **Duties in Occupation**

These duties are already part of Warwick Estates management of currently managed sites. FRA's in most instances are planned annually and the reports consider compartmentation and external walls

coverings. They not what the next steps are needed on each of these items which in most instances would mean Fire Engineer professionals being appointed.

The addition of the Safety Case and mandatory reporting to the Building Safety Regulators is an addition to current management. The Building Safety Manager would be responsible for this, but again the difficulties of finding such an individual will be very difficult.

An easier option would be a team of people covering the competencies needed, managing more buildings reducing the costs for the leaseholders.

### **Compartmentation**

Checks on compartmentalisation would be carried out as part of fire risk assessments completed before occupation. This is also part of the ongoing management and annual fire risk assessments to note any issues.

### **Safety Case**

As mentioned earlier, Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.

### **Registration and Licensing**

Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.

### **Engaging with Residents**

This is already carried out as part of the role of a Property Manager in Warwick Estates. Additional communication will be needed on how the process works and what costs are incurred and how payment is made.

Residents and leaseholders are already encouraged to engage with Warwick giving them numerous avenues for this including a Live Chat facility.

With the Golden Thread being online, residents and leaseholders will have access to all information and we will continue to send out annual fire safety communications.

### **Roles and Responsibilities of Residents**

Communications will outline the responsibilities of residents, but we already have this facility with "House Rules", "Annual Fire Safety Letters" and of course budgets. The Building Safety Charge will have separate accounts, which will have added information of "why" and this again will have additional costs for the leaseholder.

### **Regulating the Building Safety Regime in occupation**

As mentioned earlier, Warwick feel this will become part of the Building Safety Manager's responsibilities, but again the structure of this has not yet been agreed.