

Crown Premises' Fire Safety Inspectorate

Date: 30/11/2020

NACCS



Home Office

Crown Premises' Fire Safety Inspectorate
Fire and Resilience Directorate
6th Floor NW Fry Building
2 Marsham Street
London
SW1P 4DF

Your Ref:

Our Ref: LOC-40227

Please reply to:

Dear [REDACTED],

The Regulatory Reform (Fire Safety) Order 2005

Premises: Napier Barracks, Shorncliffe Camp, Folkestone, CT20 3EZ

Following the fire safety inspection of the above premises on **24/11/2020**, I am writing to confirm my opinion that the identified individuals or groups of people would be at risk in case of fire. You will need to take action to ensure their safety.

In the event that a permanent solution cannot be implemented immediately, you will need to introduce interim measures to reduce the level of risk whilst longer-term measures are being prepared.

I have included additional information to assist you with planning what action to take:

1. The schedule identifies in each case the 'immediate' (i.e. what has its roots at the premises) causes of the failures identified during the inspection.
2. Risk ratings for the fire safety measures and for key areas of fire safety management are set out in bar charts at the end of the RAG rating form.

The risk ratings will be revised during any follow-up inspection. These will be shown as a second bar on the chart, demonstrating the improvement made.

Fire safety measures are largely interactive, and fire risks can be controlled in many ways. Therefore, whilst the schedule refers to solutions you could adopt, I am not directing you to choose any one of them. It will be acceptable for you to implement any measures which achieve an appropriate standard of safety from fire.

Guidance on an appropriate minimum standard of safety has been provided by the Secretary of State to assist responsible persons with undertaking a fire risk assessment and identifying the general fire precautions which need to be in place. This can be found at <https://www.gov.uk/search?q=fire+safety+risk+assessment&tab=government-results>. The guide relevant to your premises provides useful examples of fire safety arrangements for simple building configurations together with a general guide to fire safety management and may be sufficient for your needs.

I informed you at the end of the inspection that my initial enforcement decision was to allow you the opportunity to comply in a timely manner, rather than to serve you immediately with a

notice. The next steps are, therefore, for you to develop your action plan, and to confirm the details and intended date for completion to me within 28 days of receiving this letter.

Please note that, given the level of risk involved, I can only maintain an informal enforcement approach where you are able to evidence your commitment and ongoing progress towards compliance.

If you do not undertake the necessary improvements, then you may be served with an Enforcement Notice under Article 30 of the Order.

You should seek the approval of relevant persons (e.g. freeholder) and relevant authorities (e.g. Building Control, Licensing Authority) prior to carrying out any works on the building.

There is no formal right to appeal against this letter but if you would like clarification of its contents or to comment on your experience of the visit, please contact either me or the CPFSI Team Leader on [REDACTED]

Yours faithfully

[REDACTED]

[REDACTED]

Crown Premises' Fire Inspector

Crown Premises' Fire Safety Inspectorate

CC

[REDACTED]

[\[REDACTED\]@ready-homes.com](mailto:[REDACTED]@ready-homes.com)

[\[REDACTED\]@ready-homes.com](mailto:[REDACTED]@ready-homes.com)

[\[REDACTED\]@ready-homes.com](mailto:[REDACTED]@ready-homes.com)

[REDACTED]

[\[REDACTED\]@homeoffice.gov.uk](mailto:[REDACTED]@homeoffice.gov.uk)

[name]

From: [redacted] [redacted] [redacted]@ [redacted]
Sent: 02 March 2021 12:45
To: [name]
Subject: RE: Napier Barracks

[name]

Thank you for the email.

I have been to site on various occasions subsequently, the latest visit was last Thursday.

Work is progressing and finally they seem to be taking the Fire Safety more seriously, but I will be continually monitoring it.

After the fire more resources have been thrown at the site, the detection has been serviced and repaired after a significant amount of it was vandalised during the disturbance.

Emergency lighting has been repaired and is functioning.

Staff training is happening again on the 4th, but staff questioned last week showed a good basic knowledge.

I have requested confirmation of the standards and testing of the Fire Alarm, Emergency Lighting and training.

Smoking is still happening in the blocks and the fire doors have not yet been repaired.

The Fire Risk Assessments are being reviewed currently.

Routine meetings between ReadyHomes and NACCS have not focused on fire safety but on Covid, which has to change, I know Covid has been a major issue on the site but Fire Safety can not be ignored.

No Fire Drill has yet been undertaken.

[redacted]

[redacted]

T/Assistant Team Leader

Crown Premises' Fire Safety Inspectorate

Office of The Chief Inspector Crown Premises' Fire Safety

Fire & Resilience Directorate | 6th Floor NW Fry Building | 2 Marsham Street | London SW1P 4DF

[redacted]

E : [redacted]



Registered Fire Risk Auditor

If your message is urgent please send it to [redacted] to ensure that it is picked up quickly.

For information on Fire Safety during COVID19 please follow this link to the CPFSI website

<https://www.gov.uk/government/groups/crown-premises-fire-safety-inspectorate#coronavirus-covid-19-fire-safety-guidance>



CPFSI holds limited personal data – the names, roles and business contact details of those who are responsible for or otherwise involved in fire safety at Crown premises – which we use solely for regulatory purposes. If you have any queries under the Data Protection Act please contact CPFSI or the Data Protection Officer at Home Office on DPO@homeoffice.gov.uk

From: [name}
Sent: 02 March 2021 11:56
To: [REDACTED]
Subject: FW: Napier Barracks
Importance: High

[REDACTED]

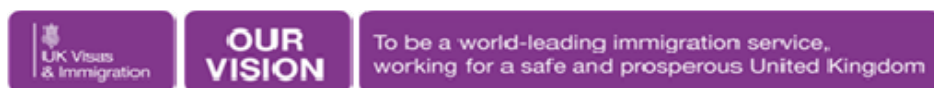
Picking up on this as part of another piece of work about Napier

Has Clearsprings Ready Homes (CRH) supplied you with specific details about resolving the issues identified in the attached i.e. evidence that the work has been completed and when?

[name]
[job title]
Resettlement, Asylum Support and Integration
UK Visas and Immigration
General Buildings
31-33 Newport Road
Cardiff CF24 0AB

[REDACTED]

[REDACTED]



From: [REDACTED]
Sent: 30 November 2020 16:50

To: [redacted]@ready-homes.com
Cc: [redacted]@ready-homes.com; [redacted]@ready-homes.com; [name]
Subject: Napier Barracks

Dear [redacted]

Please find attached my outcome letter from last week.

I understand some works have been undertaken, however, my letter has to reflect the circumstances at the time of my inspection.

Kind regards

[redacted]

[redacted]
T/Assistant Team Leader
Crown Premises' Fire Safety Inspectorate
Office of The Chief Inspector Crown Premises' Fire Safety
Fire & Resilience Directorate | 6th Floor NW Fry Building | 2 Marsham Street | London SW1P 4DF



[redacted]



Registered Fire Risk Auditor

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03 March 2021

Our reference: 129888

Your reference:

██████████
Clearsprings Ready Homes Limited
26 Brook Road
Rayleigh
Essex SS6 7XJ

Dear ██████

Building 7, Napier Barracks, Folkestone – Fire Damage

Further to your recent instructions to carry out a visual inspection of building 7 at Napier Barracks, we can confirm that we attended site on 23rd February 2021 for the purposes of reporting on the structural condition of the building and feasibility of undertaking fire damage reinstatement works as opposed to demolition of the structure.

By way of background, building 7 a dormitory accommodation building located on the Napier Barracks site in Folkestone. The building is single storey (orientated north to south) cavity brick construction beneath a pitched cut timber roof finished in synthetic slate. Internally the accommodation is split in to two dormitory areas with toilet and washing facilities located centrally. The floor is of suspended timber construction.

The building was subject to a fire on 29 January 2021 which resulted in extensive damage to northern end of the building within one of the dormitories.

External & Internal Inspection

An external and internal inspection of the property was carried out and the following matters were noted. Reference to the right and left hand sides for rooms and walls are made as looking front of the property facing towards North Road.

Starting externally, the principle fire damage is to the northern end of the building within one of the dormitories and the comments below focus on that area.

The roof covering and roof structure has been completely lost to the fire, although the cavity brick external elevations remain intact despite windows, internal plaster finishes and decorations having been significantly damaged in the affected dormitory.

While there is the usual smoke damage to the external elevations, the walls appear nominally vertical and free from significant defects. There is no visible cracking or distortion to suggest that cavity wall ties have been adversely affected by the heat. It does not appear that cavity wall insulation was present and open cavities were visible around window apertures.

The floor structure was significantly obscured by debris from the fire at the time of inspection, but appears to be of suspended timber construction and we observed one area where this has burnt through locally to leave a hole visible into the void beneath.

It should be assumed that the mechanical and electrical installations within the north dormitory have been lost in their entirety, with installations in the adjacent washroom areas also smoke and potentially heat damaged.

We would also draw your attention to the fact that the absence of a temporary roof is leaving the fire damaged section of the building exposed to the elements and this has the potential to exacerbate the situation further.

The southern end of the building is largely unaffected save for smoke damage.

Conclusions and Recommendations

Based on our visual inspection of the property, it is our opinion that the level of damage will allow the building to be reinstated without the need for wholesale demolition. The external walls remain in-situ and exhibit no significant evidence of structural distress or distortion, with the loss of the roof having allowed the fire to vent with modest damage to surrounding areas.

On the basis of the above, we would propose that the debris associated with the fire be removed and the external envelope of the building reinstated at the earliest opportunity to allow the structure to dry-out. This could be achieved by physical installation of a new roof and windows to the external elevations combined with use of dehumidifiers if desired (or simply providing a temporary roof and boarding over window apertures).

In tandem with the above, a specification and tender documents could then be produced to allow competitive tendering of the necessary works which will need to be designed to achieve current building regulations.

From a logistical perspective the above may create certain issues given the use profile of the site and risks associated with interaction of construction workers. As such, the fact that reinstatement of the building is feasible does not preclude you from undertaking demolition of the building if desired or to simply make the building wind and weathertight in the short term with a view to reinstatement in the future.

In terms of budget costs for the works, we have not been asked to produce a detailed cost plan as part of this commission, but would expect the reinstatement works to be in the order of [cost](exclusive of VAT) depending on the scope of work adopted (including extent of building services replacement), whilst a demolition and rebuild of the building would likely be in the order of [cost] excluding VAT but including professional fees. These costs assume that no asbestos contamination is present which would increase the cost of management and waste disposal.

Note that prior to undertaking any works an asbestos R&D survey will be required to confirm the presence or otherwise of asbestos containing materials within the building. We have had sight of an asbestos management plan for the site and a previous R&D survey which appear to show that only very limited ACM is present (which is consistent with the age profile of the building).

In the event that you wish to proceed with either of the above options, Watts would be pleased to provide a fee proposal to produce and specification for the necessary works and undertake the role of Contract Administrator.

We trust that the above is adequate for your current purposes, but should you have any queries or wish to discuss any aspect in more detail please let me know.

Yours sincerely

[Redacted signature]

[Redacted line]

[job title]

Watts Group Limited

[Redacted line]

[Redacted line]

[Redacted line]



1. Front (south elevation) of building



2. Right flank elevation (partial view of fire damage to roof)



3. Gable to rear (north elevation) of building



4. Stand back view of rear elevation



5. Smoke damaged dormitory to southern end of building



6. Internal view of fire damage (northern dormitory)



7. Debris in building with failed suspended timber floor beneath



8. Typical window reveal and cavity

Schedule

Premises: Napier Barracks, Shorncliffe Camp, Folkestone, CT20 3EZ

File Number: LOC-40227

This schedule should be read in conjunction with the Home Office letter dated 30/11/2020.

Please Note:

My audit was based on **sampling** your fire safety arrangements, and focused upon issues of more likely and greater risk rather than being an attempt to carry out a comprehensive check of all parts of a premises or managerial systems. Therefore, the schedule should be understood as a tool to support a review of your fire safety arrangements rather than as a substitute for a review.

I have also included some examples of deficiencies to ensure clarity, but this is not intended as a list of all the deficiencies identified during the audit.

General Fire Precautions

Articles 4 & 8 Reducing the Risk of Fire

RED 5 - The current measures for reducing the risk of fire do not ensure that relevant people are appropriately protected from serious risk.

Specific Failure: An excessive level of combustible materials were present in shared spaces.

Example of Failure: The service users are using combustible material as a way of providing privacy for their space.

Immediate Cause of Failure: Art. 5 - Corrective works are under way, but not completed.

Additional Specific Failure: Smoking is not adequately controlled.

Additional Example of Failure: Service Users are smoking within the residential areas of the blocks

Additional Immediate Cause of Failure: Art. 11 - No effective fire safety measure was in place.

Articles 4 & 8 Reducing Risk of Spread of Fire

AMBER 2 - The current measures for reducing the risk of spread of fire do not ensure that relevant people are appropriately protected from significant risk.

Specific Failure: Penetrations by pipes or cables were not effectively fire-stopped.

Example of Failure: In Block 34, there are penetrations into the means of escape stairs from the first floor

Immediate Cause of Failure: Art. 17 - Contractor has not carried out the remedial works.

Articles 4, 8 & 13 Warning of fire

AMBER 3 - There are no proposals for measures to detect and give the necessary warning of fire to ensure that relevant people are appropriately protected from significant risk.

Specific Failure: The fire detectors are not correctly sited and installed to ensure that people can receive sufficiently early warning of fire.

Example of Failure: The domestic smoke alarms in the TRI block are fitted in a location where it is unlikely smoke will reach to raise the alarm.

Immediate Cause of Failure: Art. 17 - No one had identified that the fire safety measure was ineffective.

Means Of Escape Articles 4, 8 & 14

AMBER 3 - There are no proposals to provide the emergency routes and exits which are necessary to ensure that relevant people are appropriately protected from significant risk.

Specific Failure: Emergency doors were secured in a manner which prevents them from being easily and immediately opened by any person who may require to use them in an emergency.

Example of Failure: Block 34, the door at the head of the stairs is secured with two mechanisms

Immediate Cause of Failure: Art. 9 - The risk had not been correctly assessed.

Articles 4, 8, 15(1) & 19: Emergency Procedures & Instructions

AMBER 2 - The current emergency procedures, instructions and safety drills do not ensure that relevant people - including those with PEEPs - are appropriately protected from significant risk.

Specific Failure: The fire emergency plan did not adequately meet the requirements of the premises fire strategy.

Example of Failure: All fire action notices are in English only, with the result that the non-English speaking service users would not understand the required actions.

Immediate Cause of Failure: Art. 9 - The risk had not been correctly assessed.

Articles 4, 8 & 21 Fire Training and Drills

AMBER 1 - Once implemented, the proposed staff training on the fire precautions and the specific actions to be taken in the event of fire at the premises could ensure that relevant people are appropriately protected from significant risk.

Specific Failure: The fire emergency plans for employees, other persons, and those at special risk have not been adequately tested to confirm that they are suitable.

Example of Failure: No emergency evacuation drills have been undertaken, although one is planned

Immediate Cause of Failure: Art. 9 The Fire Risk Assessment did not identify appropriate timescales for actions to be undertaken.

Management

Articles 11 & 18 Day-to-day management of safety

AMBER 3 - The failure to monitor and control the fire safety measures from day-to-day has resulted in a consequent failure to protect relevant people appropriately from significant risks.

Specific Failure: The site Responsible Person has not been provided with suitable information on the working order of the fire precautions.

Example of Failure: The site responsible person was not aware that the fire alarm systems had not been fully tested

Articles 8, 11, 17, 18 & 22 Co-operation and co-ordination

RED 6 - The failures to co-operate - particularly over the exchange of information - and to co-ordinate fire safety measures as necessary have led to a consequent failure to protect relevant people appropriately from serious risk.

Specific Failure: There was no practical arrangement for the Site Responsible Person to obtain suitable information on the progress of requested repairs and remedial works on the fire safety measures.

Example of Failure: There is no arrangement for NACCS to inform Ready Homes of failures of fire precautions

Immediate Cause of Failure: Art. 22 - Contractor had not informed the occupier that the general fire precaution was not in effective working order.

Maintenance

Articles 8 & 17 Maintaining Equipment in Efficient Working Order

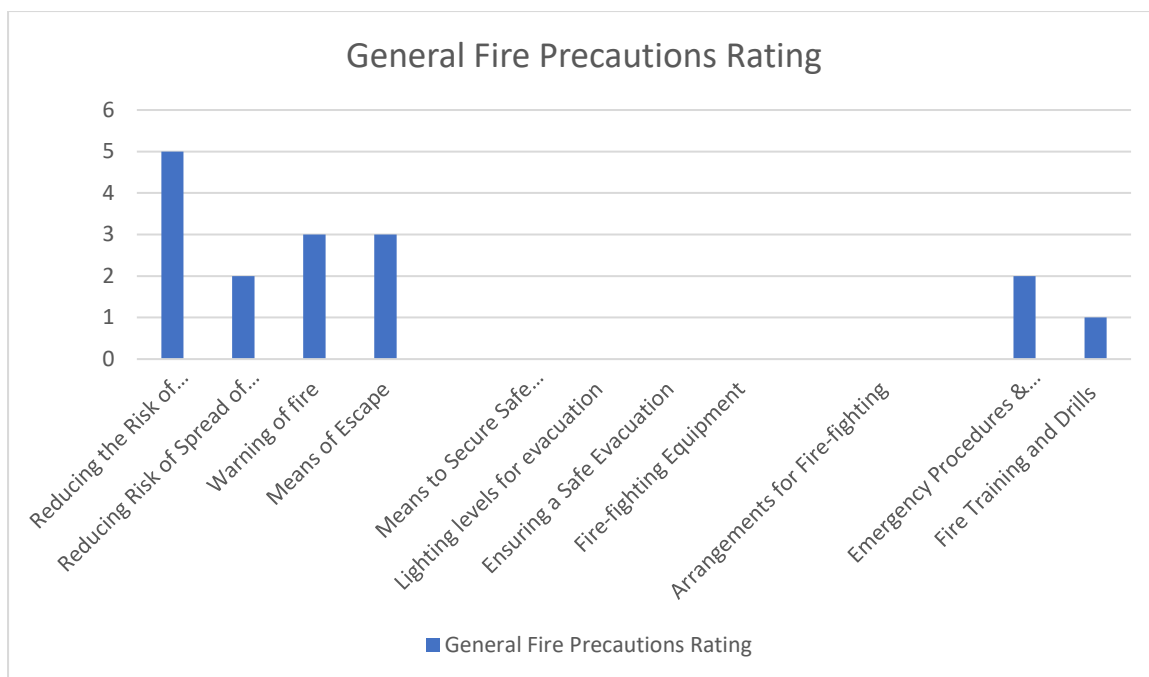
RED 6 - The failure to ensure that the premises and any fire precautions equipment are maintained in an efficient state, in efficient working order and in good repair has resulted in a consequent failure to ensure that relevant people are appropriately protected from serious risks.

Specific Failure: The facilities' manager has not ensured that PPM testing is completed in line with the contractual arrangements.

Example of Failure: NACCS have not ensured that the fire systems have been maintained within the appropriate service intervals

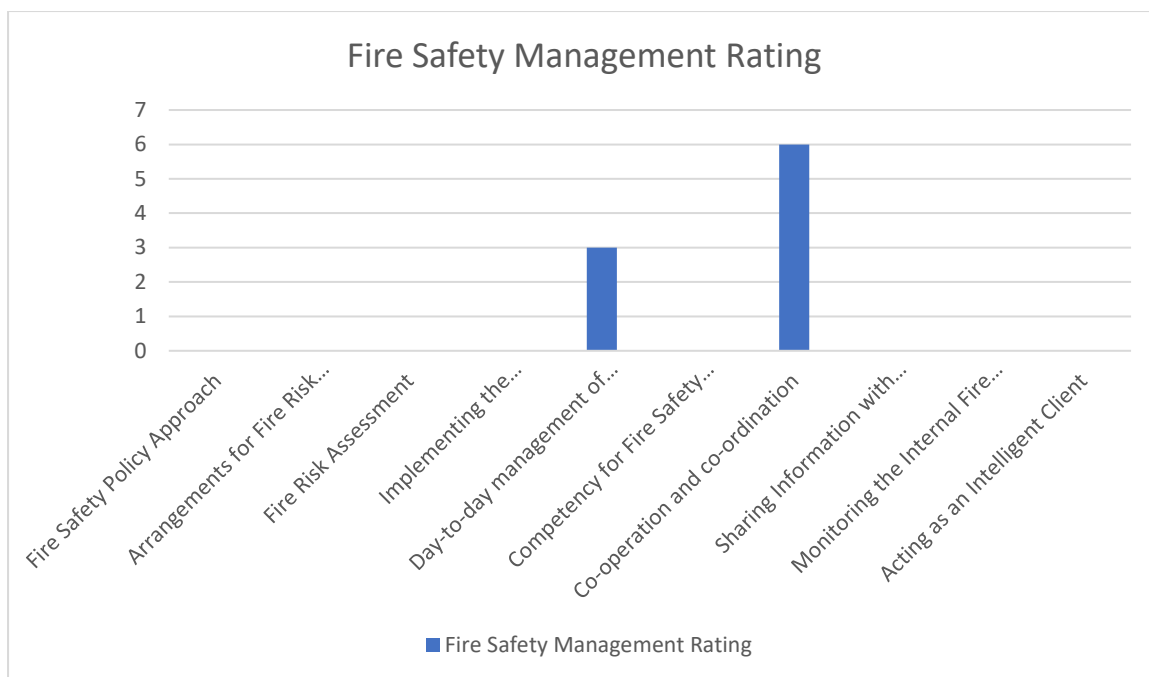
General Fire Precautions Rating

Current Serious Risk	4	5	6
Current Significant Risk	1	2	3
Tolerable Risk	0	0	0
	Adequate action planned	Inadequate action planned	No action planned



Fire Safety Management Rating

Safety Management Failure Directly Linked to GFP Failure	4	5	6
Safety Management Failure Contributing to GFP Failure	1	2	3
Safety Management Failure Incidental to GFP Failure	0	0	0
	<i>Potentially Significant Risk</i>	<i>Significant Risk</i>	<i>Serious Risk</i>



Fire Safety Maintenance Rating

Maintenance or Remedial Failure Directly Linked to GFP Failure	4	5	6
Maintenance or Remedial Failure Contributing to GFP Failure	1	2	3
Maintenance or Remedial Failure Incidental to GFP Failure	0	0	0
	<i>Potentially Significant Risk</i>	<i>Significant Risk</i>	<i>Serious Risk</i>

