

Latest technical review of Approved Document B

Briefing for housing associations

2 February 2023

Summary

Following the tragic fire at Grenfell Tower, the government committed to a multi-year review of Approved Document B – the guidance that supports those responsible to meet fire safety requirements set out in building regulations. The [latest consultation proposes changes to requirements for new buildings](#), including sprinklers in all care homes and second staircases in residential buildings taller than 30m. It also proposes to remove the national classifications for reaction to fire and fire resistance of construction products, with some potential implications on the costs of fire door sets.

The NHF will submit a sector response to the consultation, and we welcome our members' views to inform our submission.

Introduction

Following the tragic fire at Grenfell Tower, the government committed to reviewing Approved Document B – the guidance that sets out how to meet fire safety requirements in building regulations. The government [has set out the different streams of this work on their website](#) and expects that this work could take many years.

The government is currently consulting on some proposals to change Approved Document B in the following ways:

- To require sprinklers in new care homes, regardless of the height of the building.
- To remove the national classification system for describing construction products' reaction to fire and fire resistance, and require all relevant construction products to be classified to the British Standards version of the European Classification.

- To require new residential buildings that are above 30m in height to be designed and built with two staircases.

The consultation also launches a call for evidence on revisions to paragraphs 10.6 and 10.7 of Approved Document B, which cover restrictions on the use of combustible insulation materials used on external walls. The NHF does not have the technical expertise to appropriately respond to this, and so we are opting not to submit a sector response to the call for evidence.

In this briefing, we have summarised the areas subject to the consultation and shared the NHF's initial view of each proposal. We have also set out some key questions for housing associations, which include those the government is asking as part of the consultation, as well as the NHF's own.

NHF view

Following the tragic fire at Grenfell Tower, we strongly welcome any work to ensure that new buildings are constructed in a way that appropriately reduces risks for people who live in them in the future. We are eager to understand more about the government's thinking in arriving at its proposals, as well as housing associations' views on any potential implications that would benefit from being identified and discussed at the outset, so that alternate approaches or mitigations can be discussed while ensuring safety is prioritised.

Next steps

The consultation closes on 17 March. To provide us with sufficient time to consider members' views and submit a sector response to the consultation, we are asking for housing associations' feedback by no later than **Monday 6 March**. Please email your views to [Marie Chadwick, Policy Leader](#).

Sprinkler provision in new care homes

In its consultation document, the government proposes to require sprinklers in all new care homes regardless of the building's height. It makes a number of points to underpin its proposals:

- The government recognises the importance of measures to help control fire spread where residents would need support to evacuate and states that many

care home providers already choose to install sprinklers on this basis despite them not currently being a requirement.

- It also acknowledges the importance of protecting care homes from damage that might lead to residents being rehoused away from their local area.
- [Previous research it has carried out](#) had shown that there was an overall cost benefit of sprinklers in care homes, through the prevention of damage and protection of property. However, due to a reduction in fires and increasing sprinkler costs, the government now points out that there is no cost benefit.

It also acknowledges that its proposal would make sprinklers a requirement in smaller group homes that provide care, or larger buildings that include a small floor or annex for those with additional care needs. The consultation invites views on this and an alternative proposed approach, which would be to consider 10 beds as a threshold at which sprinklers would be required. This threshold is already adopted elsewhere in the guidance and in British Standards relating to sprinkler provision.

It is inviting views on retaining existing requirements on protected areas, which offer additional physical protection from other parts of a building to reduce fire spread, even where sprinklers are installed. Currently, where there are no sprinklers in a care home, each protected area can have a maximum of 10 beds with no more than one bed per room, and bedrooms must have fire doors fitted with self-closing devices. The guidance currently relaxes these requirements where sprinklers are installed, though the government acknowledges the benefit in retaining these regardless.

The proposals recommend sprinklers are provided to the BS 9251:2021 standard. In contrast to previous standards, this would extend the provision of sprinklers to some bathrooms, shower rooms and toilets, and some stairs. The government states that this represents the latest consensus view on sprinkler design and installation, and while it extends provision to more rooms, it does not cause a disproportionate burden on design or installation costs. The government proposes a six-month transition period, in line with other changes to building regulations.

In determining the cost of the proposal, the government estimates that the cost of installing sprinklers could be between £30,000 and £393,000, and annual maintenance could be £160 to £2,300.

The NHF's view

We support the government's proposals for a requirement for sprinklers in all new care homes, regardless of height, given the evidence provided of their benefit in a care home setting. For the purposes of responding accurately to the consultation, we are seeking clarity on the specific definition of care home in this context.

We would be grateful to hear from housing associations developing new care homes on their views, and from those developing group homes that provide care on the implications of the proposed 10-bed threshold.

We would also like to hear from those responsible for developing and managing safety in this type of building, to understand their views of the proposal to retain existing requirements for protected areas, as opposed to relaxing them where sprinklers are installed.

Questions for housing associations:

- Do you agree that sprinklers protection should be extended to new care homes of any height?
- Alternatively, would you agree with the proposal if it included a 10 bed threshold?
- Are there any exemptions you would include, and if so, what are they, and what is the evidence supporting their exclusion.
- Do you agree that Approved Document B should remove the current allowances on protection areas and fire doors when sprinklers are provided?
 - If not, which allowances do you think should be provided and what evidence do you have to support your view?
- Do you agree that Approved Document B should recommend sprinklers to the new BS 9251:2021 standard?
 - If you disagree, what other standards would you suggest, and what is your evidence to support using the alternative standards?
- Do you agree that there should be a transitional period of six months?
 - If you disagree, how long should the transition period be?

Removal of national classifications

Currently, much of the guidance in Approved Document B gives performance classifications for construction products' reaction to fire and fire resistance in the British Standards versions of European Classifications. The government believes that the use of these means that there is no need for the national classification to remain in use and proposes to remove references to them from Approved Document

B entirely. The government believes that the internationally recognised approach is also more robust.

According to the consultation document, a move away from the current dual system (of using both national classifications and British Standards) was always planned, but the transition was never finalised. The government's analysis is focussed on roofing materials, cavity barriers, smoke extraction (including fire dampers etc.) and fire doors as the parts of the market most likely to continue testing to the national classification. The government highlights that as a result of the change, the additional cost for fire door sets could be 50-100% higher than individual components.

As well as this, the use of the national classification standards were found to be flawed when it came to reaction to fire and fire resistance. The government removed references to the national classifications in the main body of Approved Document B in response to the inquiry into the tragic fire at Grenfell Tower and they are now only included in the annex. The government proposes to remove all remaining references in this consultation.

The government proposes a transition period of 12 months for these standards to be withdrawn.

The NHF's view

We support the government's approach to removing the national classifications from use, and for remaining references within the annex of Approved Document B to be removed.

We would be interested to hear from members who are using construction products still using the national classifications as to the reasons for doing so, and any implications of the proposal, so that we can best represent a range of views to the government. Likewise, we would like to hear views on whether 12 months is an appropriate transition period.

Questions for housing associations:

- Do you agree that the national classifications for reaction to fire should be removed from Approved Document B?
- Do you agree that the national classifications for fire resistance should be removed from Approved Document B?
 - If you disagree, what evidence can you provide that outlines why the national classifications are still required.
- Do you agree that there should be a transitional period of 12 months?
 - If you disagree, how long should the transition period be and what is your evidence to support a longer or shorter transition period?
- Please outline any concerns you have about the withdrawal of the national classification with regards to fire resistance including potential impacts, such as on the fire door industry.

Staircases in residential buildings

The government is also consulting on what guidance should be issued within Approved Document B about the provision of a second staircase in residential buildings above a certain height. These changes will only apply to new buildings.

The change is driven by a view that some tall buildings are being designed without proper consideration of the safety implications of having a single staircase. The government intends to set a maximum height for using a single staircase in buildings as well as introducing safety guidance for designers.

The government's view is that second staircases provide some benefits for taller buildings in the event of an emergency, including providing an additional means of escape for residents and reducing potential conflicts between those trying to evacuate a building and emergency responders trying to enter it. However, there is a recognition that further work needs to be undertaken to understand the evidence in this area and consider any impact second staircases could have on the viability of developments.

The government believes buildings above 30m in height should be required to have a second staircase. They have based this on 30m being a recognised trigger of additional risks in buildings overall, and that this level is an accepted threshold where additional safety measures like increased fire resistance provisions are needed.

The government estimates, based on present values, that its preferred policy option – second staircases in residential buildings above 30m in height – will cost £1.6bn to

businesses over 10 years. This is an equivalent annual net direct cost to business (EANDCB) of around £181m.

Further analysis set out in the consultation looks at hypothetical cost benefits that introducing a second staircase would bring. However, these are based on broad assumptions rather than any prior evidence.

The consultation points out that there is no standard international view when it comes to the provision of staircases within residential buildings at height. Maximum heights for single staircases in other countries range from 18 to 75m and their approaches vary greatly depending on other fire mitigation measures used, though the government doesn't detail what these are at the different height thresholds.

The government sets out in the consultation that it intends for there to be a short transition period before this change is brought in. Its view is that the transition should only be about allowing time for schemes under construction to complete rather than allowing developments to start before the requirements come into effect.

The NHF's view

We are keen to learn more from the government about the approach it has taken in reaching its view, and to see more detail of the evidence that suggests that 30m is the right height to consider the provision of second staircases. We'd like to understand the reasons why a lower threshold was not recommended, and believe it is important for residents and other stakeholders to see the robust process behind the recommendations set out in this consultation.

We support the government's ambition to bring forward these changes in a timely manner and are keen to understand what practical considerations members might have when dealing with a short transition period. Alongside this, we want to further add to the government's understanding about any potential impacts these proposals could have on the delivery of affordable housing, so we would welcome members' viewpoints on that.

We are also eager to understand more about the government's consideration of evacuation for disabled and mobility-impaired residents when arriving at this proposal. The Home Office is currently considering responses to a consultation on evacuation policy, in response to the recommendation by the Grenfell Tower Public Inquiry that "the owner and manager of every high-rise residential building should be required prepare personal emergency evacuation plans (PEEPs) for all residents

whose ability to self-evacuate may be compromised.” In the course of the consultation on Approved Document B and other government consultations on the same topic, it has been noted that disabled residents in buildings of any height may require support to evacuate.

While in this consultation, the government notes the additional benefit to disabled and mobility-impaired residents of a second staircase, in terms of providing a refuge in an emergency, it is not clear what further consideration it has given to disabled residents in lower buildings. We would like to understand more about how the government has applied knowledge of evacuation policy in existing buildings to its proposals for second staircases in new buildings, so that all stakeholders can understand how new buildings will be made fit for the future.

Questions for housing associations:

- The NHF is interested to know whether members agree with the proposed 30m+ threshold as a requirement to provide a second staircase.
 - If 30m+ is not the right threshold, what other height should be considered?
 - Should any other method beyond height be used to assess the need for a second staircase? Why?
- Do you have a view on how long the transitional should be, and what evidence do you have to support your proposed transition?

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