

Review of Approved Document B: Fire Safety

NHF consultation response

1 July 2026

Summary of our response

The National Housing Federation (NHF) is the voice of not-for-profit housing associations in England. Our members own 62% of all social homes in England, providing 2.7 million homes to around six million people. Housing associations exist to provide good quality, affordable social homes for people who need them and offer vital services to support their communities.

The safety of residents is the sector's top priority, and we are committed to working with the government to create the best possible regulatory regime and statutory guidance for residential buildings. Following the tragic fire at Grenfell Tower, where 72 people lost their lives, the Grenfell Inquiry Phase 2 report recommended a review of Approved Document B. **We welcome this consultation as part of this work – in particular:**

- We support the aim of strengthening and clarifying Approved Document B. New guidance should be proportionate, risk-based, evidence-led and practical to apply across new and existing residential buildings to raise standards and improve resident safety.
- We support clearer guidance on existing buildings, external walls and modern roofs, while recommending further clarity on how requirements interact with fire strategies, fire risk assessments, and refurbishment or retrofit works.
- We also support a threshold for combustible structural elements, provided the final approach is evidence-based and considers safety, buildability, cost and sustainability together.
- We support evacuation lifts in taller residential buildings and the move from 'sheltered housing' to 'specialised housing', but highlight the need for clear definitions, funding, and a flexible, risk-based approach that reflects resident needs, building type, evacuation strategy and feasibility.
- We also raise concern that proposed roof guidance could restrict solar PV on smaller homes and affect social housing retrofit and decarbonisation.

Further details and clarifications, produced in consultation with our housing association members, are outlined below.

Question 1: Do you agree that the changes within this consultation should be aligned with existing changes to ADB coming into effect on 2nd September 2029?

Yes.

We welcome grouping Approved Document B changes together and aligning with the existing implementation date. However, it has been raised that there are already challenges with the application of BS9991, and it may be that alternative arrangements, such as a phased approach, might be beneficial to enable changes to be implemented effectively.

General updates and clarifications

Question 3: Do you have any comments on the small but important clarifications and minor technical changes draft guidance text?

We support the clarifications. However, the final guidance should differentiate between editorial, clarificatory and substantive changes. The new guidance should also explain how each change applies to new build, refurbishment, remediation and existing occupied buildings, and how compliance is best demonstrated.

Question 4: Do you have any further benefits that should be considered?

Clearer guidance should support more consistent conversations between different stakeholders in the development process and reduce ambiguity in applying Approved Document B. Stakeholders include, for example, housing providers, designers, contractors and building control.

It should also benefit residents by supporting safer design, more consistent works and fewer delays to remediation, retrofit and investment programmes.

Clarification of applicability of Approved Document B for existing buildings

Question 5: Do you agree that the proposed text improves clarity and encourages alignment with the fire strategy, fire safety management plan, and fire risk assessment?

Yes. The NHF supports clearer guidance on how Approved Document B applies to existing buildings. Our membership own and manage diverse portfolios that range from Victorian mansion blocks, street properties, to new build high-rise and more. Clearer guidance is particularly beneficial where buildings are older, have been

converted or altered, and the original fire strategy documentation may be unavailable.

The proposed text should recognise and support better alignment between building work, fire strategies, fire safety management plans and fire risk assessments, recognising that works to existing buildings must be considered within the wider safety context.

Our members have flagged one area for recommended edit. The wording around the fire risk assessment identifying levels of safety that met the standards at the time of construction but may now be lower than contemporary standards could be open to interpretation. It is not completely clear what is meant by “proportionate” in this context, or when dutyholders would be expected to make improvements to existing fire safety measures when works are undertaken. A clearer minimum expectation or trigger for further checks would support more consistent application across existing buildings.

Question 6: Do you have views on the content, structure, and style of the proposed text?

We welcome the proposed text. We would also welcome the final guidance including practical examples for common work in existing residential buildings, including repair, refurbishment, retrofit, remediation and works affecting compartmentation, external walls, roofs, fire doors, alarms or smoke control.

It would also be helpful for the guidance to maintain a clear distinction between legal requirements and recommendations or good practice. This would give dutyholders clarity on their legal obligations while preserving appropriate technical flexibility in how compliance is achieved, supporting more consistent interpretation and implementation.

Combustible elements of structure: Introducing a height threshold for use of Approved Document B

Question 9: Do you agree that Approved Document B should include a threshold above which the guidance should not be used when combustible elements of structure are utilised?

Yes. We support Approved Document B including a threshold above which it should not be used as the sole guidance when combustible elements of structure are used. Where a taller building uses combustible structural elements, the fire safety risks are likely to require more project-specific assessment than standard guidance can provide. In those cases, a fire engineered approach may be more appropriate.

The final approach should be evidence-based and should consider fire safety, buildability, cost and sustainability together. Approved Document B should clearly identify what alternative guidance, standards or compliance routes are expected for buildings that fall outside the scope of the guidance, particularly for taller, larger or more complex buildings.

Question 10: Do you agree that the 11m threshold is appropriate?

We support the principle of a threshold and understand it provides consistency with wider industry guidance. However, we recommend that the government outline further evidence to provide assurance that 11m is the point at which combustible structural elements require further scrutiny. If this evidence does not exist, further research is required.

We would also welcome clarification of how the threshold would apply where there are basements that contain combustible structural elements. Particularly where higher-risk activities take place such as car parking, EV charging or e-bike storage.

Question 11: Do you have any comments on the draft guidance text?

Our members have raised that timber-framed buildings can present different risks. This can depend on, for example, how the timber is protected or maintained. The final guidance should address this clearly.

Furthermore, the following areas have been identified as requiring further clarification:

- Hybrid construction.
- Partial use of combustible structural elements.
- Encapsulated timber.
- Secondary structural elements.
- Basement conditions and height measurement.
- Evidence required where an alternative fire-engineered approach is proposed.

This would help clients understand design, programme, cost and risk implications at an earlier stage.

External walls, balconies, and ban on combustible materials in and on external walls

Question 12: Do you agree that section 10 (Approved Document B volume 1) and section 12 (Approved Document B volume 2) would benefit from being updated and clarified?

Yes.

Question 13: Do you agree that the updated guidance provides greater clarity?

Yes. Our members have identified the following areas for further clarification:

- The boundary between external wall systems and internal linings.
- Localised internal strengthening, such as plywood pattering to metal stud walls.
- Whether internal linings fixed to external walls fall within Regulation 7 scope.
- Roof terraces and roof build-ups directly adjacent to external walls.
- Common façade types, including masonry, lightweight framing, rainscreen systems and mixed build-ups.

Worked examples would also support more consistent interpretation.

Question 14: Do you agree that an exemption to the ban on combustible materials in and on external walls above 18m+ should be made for laminated glass in the situations specified?

Yes. We support the proposed exemption for laminated glass, if it can be used safely in the specified situations. However, the government-commissioned research paper “Fire Safety: Balconies, Spandrels and Laminated Glass – Final Report CPD 004/0120/205” found limited historic fire data and recommended further research and testing to better understand how laminated glass may contribute to fire spread. Given the inconclusive evidence and the higher-risk profile of buildings above 18m, a cautious approach should be maintained.

Question 15: Do you agree that the definition above is clear on the scope of products to be exempt from Regulation 7(2)?

Yes. However, the definition may be difficult for non-specialists to apply without confirmation from manufacturers. The guidance should therefore clearly set out the evidence, test data and manufacturer information required to demonstrate compliance.

Question 16: Do you have any comments on the draft guidance text?

The draft guidance appears clearer. We would recommend that government clarify how the guidance changes will align with any changes needed to Regulation 7, so that dutyholders, designers and contractors can apply the requirements with certainty. The draft text should also confirm whether the laminated glass exemption is limited to balustrades or may extend to other laminated glass products, such as spandrel panels.

Means of Escape for Disabled People: new provision for evacuation lifts in tall residential buildings

Question 17: Do you agree that Approved Document B should include provisions for evacuation lifts?

Yes.

Question 18: Do you agree that the threshold for provisions of evacuation lifts should be at 18m?

We agree that evacuation lifts should be compulsory in buildings over 18m. However, disabled or otherwise vulnerable residents may find it hard to evacuate via stairs in buildings under 18m. Our members welcome proposals that allow evacuation lifts to be delivered more cost-effectively in some buildings below 18m, including where a secondary supply can be provided from the same intake rather than requiring generators or other more complex arrangements. This could reduce disruption for residents, lower ongoing maintenance requirements and help limit service charge impacts.

Government could also consider alternative or additional triggers for inclusion of an evacuation lift, such as resident profile or housing type (e.g. specialised housing). In buildings where there is no trigger, government should clarify acceptable alternative means of evacuation.

The government should ensure alignment with BS 9991:2024 and local policy requirements. Our London-based members already work to higher standards in the London Plan, where evacuation lift provision may be expected in a wider range of circumstances. Greater alignment would support consistency and inclusive evacuation.

Question 19: Do you have any additional views on the proposed provisions?

As a sector our priority is the safety of our residents and we welcome measures that improve that safety.

However, measures such as this do have a significant impact on the cost of new buildings. This should be reflected in grant funding provided for new social and affordable housing. We are concerned that without additional funding, it creates an incentive to develop at below the 18m height threshold, particularly in densely populated areas. And to reach government's homebuilding targets, high rise buildings need to be viable to build.

We recommend that the government provide clarification on the scenario where buildings are being refurbished or retrofitted. Our members raised concerns that pre-

existing lift shafts may not be big enough to accommodate an evacuation lift. We also recommend including clarification on how evacuation lifts are intended to operate in residential buildings without permanent staff.

Sheltered Housing: Replacing ‘sheltered’ housing terminology and introducing new provisions for these housing types

Question 23: Do you agree that Approved Document B should introduce the new terminology for ‘specialised housing’?

There is broad support from our members for moving away from the term ‘sheltered housing’, with ‘specialised housing’ seen as more reflective of the range of provision.

However, our members flagged that further clarification could still be useful. This would be to avoid overlap between specialised housing and general needs housing where someone may receive low levels of support. This would also be to avoid overlap between independent living schemes and care homes.

We would also recommend ensuring that the Approved Document B use of the term specialised housing is aligned with across all relevant sector guidance, such as the National Fire Chiefs Council Fire Safety in Specialised Housing Guidance, and used consistently across housing and care sectors.

Question 24: Do you agree that the definition of ‘specialised housing’ should differentiate between housing types that provide the regulated activity of personal care and those that do not?

We recognise that there may be value in distinguishing between housing ‘with care’ and ‘without care’, as CQC services tend to have higher needs than supported housing. However, in practice this boundary is often fluid and can change over time, making a rigid split difficult to apply. A more flexible, risk-based approach may therefore be more appropriate. If the government chooses to continue with the suggested definitions, we suggest that they are amended to ‘with/without CQC-regulated personal care’ for clarity.

Any definition should also recognise the role of commissioned services, as these are typically arranged or overseen by the relevant authority. In some cases, provision will include CQC-registered domiciliary care services operating across multiple schemes, which further illustrates the complexity and variability of arrangements in practice.

The guidance should clearly explain how it applies where residents’ needs change over time, or where a scheme includes residents with different levels of need.

Guidance should also recognise that some settings will have permanent staff on site and others will not.

Further clarity is also required for mixed-use schemes, where only a proportion of residents receive personal care. It would be helpful for Approved Document B to confirm whether classification should be determined by:

- The design and intended function of the scheme.
- The proportion of residents receiving personal care.
- Or the circumstances of individual occupants.

Providing this clarity will support consistent interpretation and application by duty-holders, fire risk assessors and enforcing authorities.

Question 25: Do you agree that Approved Document B should introduce increased alarm provisions in specialised housing with care?

We support measures that improve early warning, such as alarms, particularly given that some residents may find it harder to evacuate. However, it would be helpful to better understand why proposals are focused specifically on 'with care' housing and how they align with different evacuation strategies. It would also be helpful to outline what alert systems are acceptable when residents have hearing and/or visual impairments.

Many of our members already adopt enhanced specifications when replacing fire alarm systems, including telecare monitoring within domestic alarms. A risk-based approach has been taken, with many schemes moving towards LD1 systems, which extend detection into bedrooms and provide a proportionate improvement over LD2 where upgrades are undertaken.

While early warning systems are essential, sprinklers or misting systems can provide an additional layer of protection, and a combination of both may offer the most effective safety outcome where appropriate. However, this must take account of the building type, resident profile, and practicalities of installation in existing homes.

There are also concerns about cost, which can be prohibitive and is typically recovered through service charges, ultimately impacting residents.

Overall, improvements to safety are welcome, but solutions should be proportionate, risk-based, and mindful of cost and practical implementation. We also recommend that the government commission further research into the life safety benefits of sprinklers (and misting systems), considering the research referenced in the consultation document is 20 years old.

Question 26: Do you have views on which provision may be more suitable to implement? [Alarms / Sprinklers / Both / Other provision]

Our members that contributed to this response reported that for new-build schemes, a risk-based approach is already in place, with sprinkler systems and LD1 alarm systems installed as standard.

For existing homes, a case-by-case, risk-based approach is taken, considering factors such as enhanced detection measures, person-centred fire risk assessments, and the targeted use of suppression systems for higher-risk residents or where required by the building design. Alarm provision can be particularly effective for this client group, including features such as flashing alerts for residents who are deaf or hard of hearing.

While all measures that improve safety are supported, it is essential that implementation remains proportionate and firmly grounded in a risk-based approach.

Question 28: Do you have any comments on the draft guidance text?

The guidance should clearly explain how it applies where residents' needs change over time, or where a scheme includes residents with different levels of need.

We would also welcome clarity on whether the requirements apply only to new schemes or retrospectively to existing schemes.

Question 29: Do you have views on what impact this text may have on industry?

The impact will depend on whether the requirements apply only to new buildings or also shape expectations for existing specialised housing.

Clear national guidance should help to align standards across providers of specialised housing, including the private sector.

Additional fire safety guidance for roofs – continued

Question 30: Do you agree that updated guidance more adequately considers modern roofs?

We are supportive of the guidance being updated so that it better reflects modern roofs. We understand the PV systems can present fire safety hazards and that this risk must be addressed in guidance.

However, members have raised concerns that the proposed guidance would limit solar PV installation on smaller homes including mid-terrace homes. Solar PV is an important part of achieving net-zero, decarbonising homes, and meeting other government requirements such as minimum energy efficiency standards (MEES).

We recommend that government consider if there are potential mitigations that would allow solar PV to be safely installed on smaller roofs. This could include, for example, installer competence, product standards, inverter and connector safety, system design, testing evidence and maintenance requirements. Any permitted mitigations must be safe, practical, and maintainable.

Our members also raised that the guidance does not fully address the range of modern roof constructions used in residential development. Further clarification is needed for:

- Concrete frame roofs.
- Steel frame roofs.
- Flat roofs.
- Warm roofs.
- Inverted roofs.
- Blue/green roofs.
- Roof terraces.
- Podiums.
- PV arrays.
- Air Source Heat Pumps.
- Roof/compartment wall junctions.