

# Fire safety: risk prioritisation in existing buildings – a call for evidence

## Briefing for housing associations

6 February 2020

### Summary

The government has launched a call for evidence on how to prioritise safety risks in existing buildings and categorise buildings based on risk, to help ensure buildings are safe.

Responses to this call will help the government scope a future research project to develop an evidence base on this topic, as well as shape government policy.

We are seeking housing associations' feedback on this call for evidence in order to inform a sector response.

In this briefing, you'll find a summary of the proposals and key questions we'd like your answers to. **Please share your answers with us by Wednesday 12 February.**

You can do this by sending them to Tommy Collins, Policy Officer, via [tommy.collins@housing.org.uk](mailto:tommy.collins@housing.org.uk) or 0117 952 9916.

## Introduction

The government has published [a new call for evidence](#) seeking views and ideas on how risks should be prioritised in existing buildings and how to categorise buildings based on risk. It seeks to better understand the complexity of building risk, to help prioritise work to make existing buildings safer.

This call for evidence will inform a wider piece of government-commissioned research seeking views on:

- A case by case risk-based approach to existing building safety.
- Considering factors aside from height when classifying building risk.
- The significance of height in classifying building risk.
- Topics, approaches and evidence for research on the prioritisation of building risks.
- Innovative ideas for assessing existing building risk.

This call for evidence is in line with the Secretary of State's commitment to conduct a full-scale technical review of the fire safety guidance to the Building Regulations (Approved Document B) and to provide advice to building owners and residents.

## Background

For new buildings, building regulations and supporting guidance set fire safety standards based on risks associated with generic categories of building type and size. However, for existing buildings, the government believes that a simplistic categorisation of building type and risk may not always be practicable and a more bespoke approach to consider risk and appropriate mitigation is necessary.

[Our sector response](#) to the government's Building a Safer Future consultation supported this view, advocating for a risk-based approach to determine the scope of the new building safety regulatory regime.

The government recognises the need for research to develop an evidence-based method of characterising and prioritising existing building risks and subsequent mitigation actions, grounded in an understanding of wider risk management.

## Call for evidence details

This new call for evidence sets out that the two main ways to address fire risks in buildings are:

- The use of trigger thresholds, used to account for group risks and provide definitive guidance.
- Individual fire risk assessments, carried out by competent assessors to determine and classify the risks within buildings.

### Trigger thresholds

Trigger thresholds in the guidance to the Building Regulations (Approved Document B) are used to determine a number of fire safety provisions including sprinklers, maximum compartment size, single stair allowances, wet risers, and fire resistance performance requirements.

In response to Dame Judith Hackitt's Independent Review, the government has committed to a [full-scale review of Approved Document B](#). The review commenced with [a previous call for evidence](#) that identified trigger heights and thresholds as an area requiring further research. Thresholds and trigger heights for sprinklers, dry risers, fire-fighting shafts and basement depths were particularly highlighted.

### Fire risk assessments (FRAs)

The new call for evidence recognises that there are several approaches to individually assessing the fire risk in buildings, and a number of tools and guidance to help conduct an assessment. FRAs consider a variety of risks such as building design, building layout and purpose, occupation, operational capacity of fire and rescue services, expected fire load and probability of a fire occurring, among others.

The new call for evidence also recognises that there are other risk-based approaches commonly used outside of FRAs, such as those used in infrastructure projects and health and safety.

### Further research

Once it has considered and analysed the responses to this new call for evidence, the government intends to commission research on this topic. The evidence and views gathered from this call for evidence will help define the scope of this research.

## NHF view

The primary focus of housing associations is, and always will be, the safety and wellbeing of their residents.

Since the tragic fire at Grenfell Tower, housing associations have been reviewing and remediating their existing buildings to ensure they meet safety standards, but have not limited this work to buildings of 18m or above in height. They are instead assessing risk holistically, based on a range of evidenced factors including – but not limited to – building design, construction and safety features.

[Our sector response](#) to the government’s Building a Safer Future consultation called for a risk-based approach to determine the scope of the new building safety regulatory regime, supporting the government’s objective to drive culture change in relation to safety across the entire built environment.

We therefore welcome the government’s work to better understand how to prioritise risks in existing buildings. This approach will support dutyholders and the new regulator to prioritise buildings that are potentially more complex and to ensure homes are safe. It will also enable a deliverable transition to the new regime and help manage sector expertise and capacity.

We also maintain that residents should be involved in any decisions that affect their homes, including assessing and understanding the risk of buildings. This recognises the important role residents play in ensuring the safety of buildings, and in identifying any concerns.

## Questions to answer

Please **respond to the questions in green** in the following sections. For our sector response, we’ll also put forward evidence, including case studies and any cost, risk and benefit analysis provided by our members. Our response will be supported by our ongoing engagement with our members on building safety, and responses to earlier consultations.

### Questions from the call for evidence

The call for evidence questions we are seeking your feedback on are:

- 1. Do you agree that a case by case risk-based approach should be taken for existing buildings?**

**2. What factors, aside from height, do you think should be considered when classifying building risk?**

Please provide evidence to support your answer.

**3. How significant do you consider height to be when classifying building risk?**

Please provide evidence to support your answer.

**4. Can you specify areas the research on the prioritisation of risks in buildings should consider?**

**5. Can you specify approaches and evidence the research should consider when prioritising action between different buildings?**

**6. Can you provide innovative ideas and supporting evidence of approaches to assessing risk in existing buildings?**

## **Additional questions**

In addition to these questions, we'd appreciate feedback on the following questions:

**7. In our Building a Safer Future consultation response, members advocated a risk-based approach to determine the scope of the new building safety regulatory regime. Can you provide us with any further information about your risk-based approach and any models or good practice you follow?**

**8. What might a risk-based approach mean for your residents, as opposed to a building-based approach?**

**9. In [the consolidated advice note](#) and its application, do you think anything is missing or unclear?**

Can you provide evidence to support your answer, including information about the additional number and type of buildings now covered?

**10. When considering risk approaches and evidence, what implications does this have for managing risk across a portfolio of buildings?**

Can you provide additional evidence to support your response?

## Additional feedback on remediation requirements

In addition to answers in response to this call for evidence, we are also seeking views from housing associations on the broader context of remediating buildings. This will help to inform the NHF's work on building safety moving forward, as well as our response to this call for evidence. **Please send your answers to these questions to Victoria Moffett, Head of Building and Fire Safety Programmes, via [victoria.moffett@housing.org.uk](mailto:victoria.moffett@housing.org.uk) or 07920 251788.**

Following the government's publication of the consolidated advice note for owners of multi-storey and multi-occupied buildings, we are eager to gain housing associations' views on the application of the advice note, and would appreciate your answers to the following questions:

**11. What work are you already conducting to remediate buildings across your portfolio?**

**12. What have been your initial assessments of the requirements for your organisation and your residents?**

**13. What does a programme of remedial works across your stock in the context of requirements in the consolidated advice note look like?**

## How to share your views

The deadline to share your views with us is **1pm on Wednesday 12 February** and we would be grateful if you could send us your responses as soon as possible.

To share your views, please answer the questions outlined in this briefing and send them to Tommy Collins, Policy Officer, via [tommy.collins@housing.org.uk](mailto:tommy.collins@housing.org.uk) or 0117 952 9916.

Please note that answers to the **questions on remediation requirements** should be sent to Victoria Moffett, Head of Building and Fire Safety Programmes, via [victoria.moffett@housing.org.uk](mailto:victoria.moffett@housing.org.uk) or 07920 251788.

## Next steps

The government intends to commission relevant research, informed and defined by the results of this call for evidence.

Any evidence and views gathered may also be used to further MHCLG policy development and to inform the Independent Expert Advisory Panel's further consideration of the issue of fire safety and risk in existing buildings.