

Royal Institute of British Architects Response to Home Office Fire Safety Government Consultation

12.10.2020

Fire Safety Consultation: <https://www.gov.uk/government/consultations/fire-safety>

Question 1	Response
Please select in what capacity you are responding to this consultation. Please select any that apply.	
I) Other	Professional Body

Question 2	Response
Please indicate whether you are responding as an individual or on behalf of an organisation.	
c) Trade body or other representative group of individuals or organisations (If yes, skip to question 5)	Yes

Question 5
If you are responding on behalf of a trade body or other representative group of individuals or organisations, please provide:
a) The name of the group
The Royal Institute of British Architects
b) Brief description of its objectives
The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.
c) Brief description of its membership
d) Number of members
<ul style="list-style-type: none"> • RIBA Chartered Architects (30,000) • RIBA Chartered Practices (3700) • Other memberships include: Associate Members, Affiliate Members and Student Members

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1.2 Responsible Persons

<p>Question 10: To what extent do you agree that a requirement for RPs to record who they are, the extent of their responsibility under the FSO, and their contact information will facilitate the identification of RPs?</p>
<p>Please see RIBA response to Question 14.</p>
<p>Question 11: To what extent do you agree that the requirements set out in proposal 1 be extended to others that have control of the premises, such as dutyholders?</p>
<p>Tend to agree. The RIBA recommends that individuals who have control of a premises, where they can affect the safety of users, should be accountable.</p> <p>The RIBA recommends that the relationships and between the Responsible Person (RP) and others are considered carefully, to ensure that there are clear boundaries and responsibilities to avoid overlapping duties. If such conflict cannot be mitigated, legislation should be as such that one party would have overarching responsibility to address the issue. The RIBA recommend that further consideration is given to the objective to ensure clarity, where the aim to have one named individual, is not lost.</p>
<p>Question 12: To what extent do you agree that the information the RP is required to record should include a UK based contact address?</p>
<p>The RIBA acknowledges that requiring a UK address would align the Fire Safety Order (FSO) with the requirement set out in the Draft Building Safety Bill (Clause 63), where the recommendation from the Independent Review outlined that the name and UK contact information of the dutyholder(s) in occupation should be notified to the Building Safety Regulator and to residents and any other landlords of dwellings in the building.</p>
<p>Question 13: To what extent do you agree that the duty to cooperate and coordinate (Article 22) should be amended to include a requirement for RPs to take steps to identify themselves to all other RPs (and where applicable Accountable Persons and/or Building Safety Managers as proposed under the Building Safety Bill) where they share or have duties in respect of the same premises.</p>
<p>Strongly agree. The RIBA supports an amendment to Article 22 of the FSO on all RPs, to identify themselves to all other RPs (and where applicable Accountable Persons and/or Building Safety Managers as proposed under the Building Safety Bill) where they share or have duties in respect of the same premises. This includes a reciprocal requirement on the Accountable Person.</p> <p>The RIBA recommends that any legislation, alongside any supporting guidance, should not have conflicting duties between the 'Responsible Person' under the Regulatory Reform (Fire Safety) Order 2005 and the proposed 'Accountable Person' under the Draft Building Safety Bill. It should include a statutory requirement for the Fire and Rescue Services and local authorities to co-operate with each other, to avoid the dutyholder receiving conflicting duties by the regulator from each of the pieces of legislation.</p>

The RIBA recommends that where there are two or more persons responsible for different parts of the building and different issues (such as health and fire safety) under separate legislation, there should be a duty on them to cooperate and coordinate with each other.

There should be clear boundaries between these pieces of legislation to ensure that there are clear lines of responsibility. Responsibility and associated regulatory power should be placed with the most appropriate body and should avoid conflict which may not be able to be resolved with no party having overarching responsibility.

Question 14: Do you have any other comments to further support your answers above?

Response to Q10. The RIBA supports the requirement for Responsible Persons (RPs) to record who they are and their contact information. The RIBA acknowledges the benefit of outlining their [RPs] responsibilities under the FSO, however, the RIBA recommends that the rather than each RP outlining their responsibilities, the Home Office should provide standard guidance that they can use, which outlines their responsibilities under the FSO. This avoids the potential for RPs to outline different scopes and omit or fail to identify specific responsibility's, as well as creating clarity across the sector for the scope of the role.

1.3 Quality of Fire Risk Assessments

Question 15: To what extent do you agree that the FSO should include a competency requirement for fire risk assessors and other fire professionals engaged by the RPs?

The RIBA supports the proposal to amend the FSO to require that any person engaged by the RP to undertake all or any part of the fire risk assessment must be competent.

The RIBA recommends that a responsibility should be placed on RPs when they seek professional advice to discharge their duties under the FSO, to 'take reasonable steps to satisfy themselves that those who will carry out the work have the skills, knowledge, experience, and, where they are an organisation, the organisational capability to carry out the work in a way that secures health and safety. Reasonable steps will depend on the complexity of the project and the range and nature of the risks involved' (CDM 2015).

Details of Evidence Provided

- Construction (Design and Management) Regulations 2015. Guidance on Regulations
<https://www.hse.gov.uk/pubns/priced/l153.pdf>

Question 16: To what extent do you agree that the name and contact information of an individual engaged by the RPs to undertake any or all of the fire risk assessment, should be recorded within the completed fire risk assessment.

The RIBA recommends that individuals responsible for providing a fire risk assessment should be recorded as the organisation that provided the service, to ensure corporate responsibility, or as an individual as sole trader.

Question 17: Please set out any further information you think fire risk assessments should include.

The RIBA responded to the MHCLG consultation on the ‘review of the ban on the use of combustible materials in and on the external walls of buildings’, which should be considered when developing fire risk assessments. The RIBA recommended that appropriate research should be undertaken to ensure that any categorisation does not limit or narrow building types that may be a higher risk. The RIBA recommended that a research programme should consider a wide range of characteristics beyond height and building type such as:

- layers of fire safety measures included in the building
- building layout and complexity
- location of escape routes
- occupancy characteristics (including familiarity, vulnerability, mobility and whether there is a sleeping risk)
- construction quality
- management processes (ongoing review, maintenance of systems and records)
- expected fire load
- calorific value per m³ in the external wall.
- probability of a fire occurring
- standard firefighting operations

The RIBA recommends that other factors, aside from those raised in relation to the ban on the use of combustible materials in and on external walls of buildings, are considered when classifying building risk. In our response to the MHCLG ‘Fire Safety: Risk Prioritisation in Existing Buildings’ consultation (Submitted 17 February 2020), we outlined the development of a simple approach to fire safety design, creating a set of ‘layers of fire safety’ based on technical research by the RIBA, which draws from relevant industry and Fire and Rescue Authority expertise. The following layers of fire safety could be used to begin a fire risk assessment:

- Selection of materials to adequately resist the spread of fire – internal fire spread (linings, structure and compartmentation) and external fire spread
- Centrally addressable fire alarm systems (detection and alert)
- Evacuation plan – is the building designed to enable safe escape
- Sprinklers / automatic fire suppression systems
- Emergency lighting
- Wayfinding signage for occupants
- Alternative means of escape
- Ventilated corridors
- Travel distances – appropriate to mobility of possible users
- Protected refuge/firefighting lobbies
- Protected stairways

- Access and facilities for the fire service
- Firefighting control area and alarm control panel at entrance level
- Wayfinding signage for Fire and Rescue Services
- Dry riser outlets in protected lobbies (and stairways)

In addition to the layers of fire safety (which are principally concerned with the building fabric, design and specification), the following factors should also be considered in existing buildings, to identify and appropriately quantify building risk adequately:

- an accurate record of building changes (if any);
- the appropriateness and quality of premises management;
- records and maintenance procedures of fire safety systems;
- the provisions for staff training and ongoing controls;
- occupancy characteristics information (including familiarity and whether there is a sleeping risk);
- the anticipated likelihood of a fire occurring;
- the anticipated severity and potential spread of any fire
- data of any previous fires (including cause, damage and any associated risk reductions steps)

These factors, together with the layers of fire safety, broadly outline the overarching principles that should be considered when determining risk in existing buildings. The RIBA acknowledge several detailed published documents providing guidance on fire risk assessments and fire precautions, as well as guides developed to assist building owners in managing fire safety safely and appropriately (See 'Details of evidence provided' below), should be considered as part of the scope when determining risk.

The RIBA recommended that risk-based assessments should be undertaken for existing buildings on a case by case basis using a standard process. This approach may be used to identify key thresholds or requirements that might be used in a future scope of the ban.

Details of Evidence Provided

- RIBA response to the MHCLG consultation on the review of the ban on the use of combustible materials in and on the external walls of buildings
<https://www.architecture.com/knowledge-and-resources/resources-landing-page/riba-response-to-review-of-combustible-materials-restriction>
- Local Government Association, 'Fire safety in purpose-built blocks of flats'
<https://www.local.gov.uk/sites/default/files/documents/fire-safety-purpose-built-04b.pdf>
- Fire safety risk assessment: sleeping accommodation
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/422192/9281_Sleeping_Accommodation_v2.pdf

- Guidance on fire safety provisions for certain types of existing housing, Local Authorities Coordinators of Regulatory Services, 2008
<https://www.cieh.org/media/1244/guidance-on-fire-safety-provisions-for-certain-types-of-existing-housing.pdf>
- Building safety advice for building owners, including fire doors, MHCLG
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860484/Building_safety_advice_for_building_owners_including_fire_doors_-_January_2020.pdf

Question 18: To what extent do you agree that a duty should be placed on all RPs to record their completed fire risk assessments?

Strongly agree. The RIBA supports the proposal to include a duty to require all RPs to record their fire safety arrangements, to ensure that those responsible have documented evidence for the effective planning, organisation, control, monitoring and review of the preventive and protective measures within the premises.

The RIBA Recommends that the addition of any additional duties on the RP are complementary with other regulatory requirements, including the duties to be developed for all dutyholders as set out in the Draft Building Safety Bill.

Question 19: To what extent do you agree that all RPs should be required to record their fire safety arrangements (Article 11)?

Strongly agree. The RIBA supports the proposal to remove the requirement that only certain RPs must record their fire safety arrangements (Article 11), to ensure that those responsible under the FSO in control of the premises have a duty for the effective planning, organisation, control, monitoring and review of the preventive and protective measures.

Question 20: Do you have any other comments to further support your answers above?

The RIBA recommends that general duties (Regulation 8.3) from CDM 2015 could be used as a basis for a duty on the RP, to ensure that the people and organisations they appoint have the skills, knowledge, experience and (if an organisation) the organisational capability to fulfil the role they are appointed to undertake.

Details of Evidence Provided

- Construction (Design and Management) Regulations 2015. Guidance on Regulations
<https://www.hse.gov.uk/pubns/priced/l153.pdf>

2.1 Definition of Height for High-Rise Buildings

Question 66: To what extent do you agree that we should apply the same height definition for high-rise residential buildings to that set out in the proposed Building Safety Bill (18 metres and above and / or more than six storeys whichever comes first) to any proposed regulations made under the FSO?

The RIBA supports the proposal to adopt the same height definition for high-rise residential buildings, specifically for the continuity of definitions and responsibilities between different regulatory requirements.

Question 67: Do you have any other comments to further support your answers above?

The MHCLG consultation on the review of the ban on the use of combustible materials in and on the external walls of buildings included consulting on applying the ban to relevant buildings with a storey at least 11 metres above ground level, and extending the scope to all buildings with a room for residential purposes. Approved Document B (Volume 1) was amended in May 2020, to require sprinklers and other fire safety measures in dwellings with a storey at least 11 metres above ground level. These changes and proposals clearly indicate that dwellings and buildings with a room for residential purposes, with a storey at least 11 metres above ground level, are considered higher risk.

In the RIBA response to the Draft Building Safety Bill, we recommend that the definition of higher-risk building at the outset of the regulatory regime, during the design and construction phases, is widened to include the following building types with a storey at least 11 metres above ground level (using the definitions from the Building Regulations 2010):

- buildings with more than one “*flat*”
- buildings with a “*room for residential purposes*”
- “*Institution*”

The RIBA recommended that the full regulatory regime (design, construction and in-use) should be widened as soon as possible, to include all other buildings where a catastrophic event could cause multiple fatalities.

Details of Evidence Provided

- RIBA Response to the Review of the ban on the use of combustible materials in and on the external walls of buildings including attachments <https://www.architecture.com/-/media/GatherContent/RIBA-Part-3-examination-information/Additional-Documents/RIBA-Response-to-Review-of-Combustible-Materialspdf.pdf>
- RIBA Response to MHCLG Draft Building Safety Bill <https://www.architecture.com/-/media/A3A0C75559ED4BA7BCDDB34A36697999.pdf?la=en>

- Fire safety: Approved Document B, May 2020 amendments (Volume 1 and 2) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/887210/AD_B_2019_edition_May2020_amendments.pdf

2.2 External Walls

Question 68: To what extent do you agree with the above proposal to make regulations as described above? Please explain.

The RIBA supports the proposal to require the relevant RPs in high-rise residential buildings to provide local Fire and Rescue Services with information about the design of the building's external walls as well as details of the materials they are constructed from, including any changes.

The RIBA recommends that technical clarity should be provided, so it is clear what is intended to be included as part of the external wall? For example, is this cladding or external walls, and does this include windows and doors, rainwater goods, or materials that are exempt from the ban on the use of combustible materials in an on external walls of buildings.

Question 69: In your view, what form should the information in relation to fire risks linked to the design and materials of the external wall structures, and the mitigating steps, be provided:

- a) A bespoke standard format, or
- b) The relevant section of the fire risk assessment that is related to external walls?

The RIBA support Option B, to create a relevant section in the fire risk assessment that is related to external walls. However, the duty to provide additional information in relation to the level of risk that the design and materials of the external wall structure gives rise to and the associated mitigating steps needs further clarity. How can such an assessment be made, fairly and proportionately, for all buildings? Mitigating steps, more generally, would be covered as part of the assessment, for example, access for the Fire and Rescue Service (vehicular access), location (and type) of risers.

Question 70: Do you have any other comments to further support your answers above?

No Comment.

2.3 Plans

Question 71: To what extent do you agree with this proposed approach to make regulations as described above? Please explain.

The RIBA supports the recommendation to require RPs provide the most up-to-date floor plans, identifying the location of key fire-fighting systems, to their local Fire and Rescue Services in an electronic format.

Question 72: Please indicate what key firefighting equipment could be included in the building plans:

- a) Dry risers;
- b) Wet risers;
- c) Location of the nearest fire hydrant;
- d) Smoke control systems;
- e) Suppression systems (including associated operating instructions);
- f) Lifts; or
- g) Other (please specify).

The RIBA consider the following information should be added to assist the Fire and Rescue Service:

- Evacuation strategy– noted on plans (See RIBA response to Question 91)
- Centrally addressable fire alarm systems (detection and alert) – location of controls (including associated operating instructions)
- Location of firefighting control area and alarm control panel (entrance level)
- Dry and / or wet risers (including inlet locations with 18m hose line to the anticipated pumping appliance vehicular parking locations)
- Location of hydrants (where larger sites) / nearest hydrant
- Passive or mechanical ventilation and locations, including any specific smoke control systems (for example, car parks, corridors)
- Travel distances
- Sprinklers / automatic fire suppression systems (including associated operating instructions)
- Locations of emergency lighting (indicated on plans)
- Protected refuge/firefighting lobbies
- Protected stairways
- Lifts and evacuation lifts, with back-up power operated lifts indicated

The RIBA recommends that the Home Office review these proposals with the Fire and Rescue Services, to identify what information they need to carry out their duties effectively.

The RIBA acknowledges that the complexity and sophistication of systems, and complex building design solutions, it may be necessary for other operating instructions to be included, as well as any design intentions for how systems have been designed and integrated into the building for their planned use (where appropriate). This should form part of the review and discussion to ensure that they (Fire and Rescue Services) have the relevant information to hand discharge their duties.

Question 73: Please indicate whether you think building plans should be provided for every floor of a building or only for those floors that are different in their layout?

- a) Every floor of the building;
- b) Only for those floors that are different in their layout.

The RIBA acknowledges that only providing floor plans that are different in their layout (but clearly indicate which floors are the same on specific plans) would reduce the volume of information for Fire and Rescue Services to review, and reduce the chance of information on floor plans being missed (as plans will only be provided where there are differences).

Although the RIBA acknowledge this option is the most appropriate from the proposal options provided, the RIBA recommends that the Home Office review these proposals directly with the Fire and Rescue Services, to identify what information they need to discharge their duties.

Question 74: Do you have any other comments to further support your answers above?

The RIBA recommends that any information produced, is only such information that is required for safety purposes. During the project, the client may wish to have additional information or data to assist them in running their building, and caution should therefore be applied to ensure that such information is not confused with relevant safety information.

Further information should be provided for proposal 13 (*We propose to go further by requiring RPs to provide their local Fire and Rescue Service with an additional single page building plan, which should include the location of all key firefighting equipment*), to identify how a single plan would address complex building sites, without causing unnecessary confusion. For example, large scale mixed-use developments, split over a number of buildings on a sloping site, may share fire and rescue vehicular access, but access to the various building may be at different levels, not only between the buildings, but within the buildings themselves. A building may be accessed from ground level at the ‘front’, but where tender access may be available could be set within a courtyard at the rear, where access may be at level 1. Consideration should be given to how this may work, such as providing sections of the development, to ensure information is presented accurately, yet simply for quick identification by the Fire and Rescue Service.

The RIBA recommends that any requirements should have accompanying guidance notes, to ensure that relevant and critical information is produced. Guidance may also suggest a base level of detail and format, to meet a common standard, but should limit dutyholders to produce more information such that it sufficiently covers the complexity of the building.

2.4 Premises Information Boxes

Question 75: To what extent do you agree with this proposed approach to make regulations as described above? Please explain.

The RIBA supports the proposal for RPs to have in place in high-rise multi-occupied residential premises a Premises Information Box. Please see RIBA response to Question 73B and 74, which identifies specific issues that should be considered prior to stipulating the format of documents to be included within the box. Further detail should also be conveyed, such as the application of minimum drawing scales, to ensure that plans are legible. The RIBA recommends that clear guidance should be provided to ensure that a standard format for drawings (including their content) for all relevant buildings is adopted, and in agreement with the Fire and Rescue Service and any other relevant parties.

Question 76: To what extent do you agree that the Premises Information Boxes should include copies of the completed fire risk assessment?

The RIBA supports the proposal for copies of the completed fire risk assessment to be included in the premise’s information box.

<p>Question 77: To what extent do you agree that the Premises Information Box should include the contact details for the relevant Responsible Person?</p>
<p>The RIBA supports a requirement for the contact details of the relevant Responsible Person should be included in the premise’s information box. However, the Fire and Rescue Service should already have this information prior to attending a call out to a fire.</p>
<p>Question 78: To what extent do you agree that there should be a consistent approach to Premises Information Boxes between the Fire Safety Order and the Building Regulation guidance?</p>
<p>The RIBA supports a consistent approach to Premises Information Boxes between the Fire Safety Order and the Building Regulation guidance, to ensure there is continuity between guidance, and for the avoidance of conflict of information.</p>
<p>Question 79: To what extent to you agree that Approved Document B should set the threshold at 18m top storey height only in relation to the Premises Information Boxes requirement?</p>
<p>The MHCLG consultation on the review of the ban on the use of combustible materials in and on the external walls of buildings included consulting on applying the ban to relevant buildings with a storey at least 11 metres above ground level, and extending the scope to all buildings with a room for residential purposes. Approved Document B (Volume 1) was amended in May 2020, to require sprinklers and other fire safety measures in dwellings with a storey at least 11 metres above ground level.</p> <p>These changes and proposals clearly indicate that high-rise multi-occupied residential premises with a storey at least 11 metres above ground level, are considered higher risk. The RIBA recommend that the requirement for Premises Information Boxes are applied to high-rise multi-occupied residential premises with a storey at least 11 metres above ground level, are considered higher risk.</p>
<p>Question 80: Do you consider that other recommendations should be provided? Please explain.</p>
<p>No comment.</p>
<p>Question 81: Do you have any other comments to further support your answers above?</p>
<p>No comment.</p>

2.5 Lifts

<p>Question 82: To what extent do you agree with this proposed approach to make regulations as described above? Please explain.</p>
<p>Strongly agree. The RIBA supports the proposal to require that relevant RPs in high-rise residential premises undertake <i>regular</i> checks of any lifts within the building that are designed to be used by fire-fighters and of the mechanism which allows fire-fighters to take control of lifts.</p> <p>The RIBA recommends that the Home Office conduct a review, including associated research with, for example, facilities management bodies et al, and lift manufacturers (alongside any maintenance requirements), in order to identify the most appropriate frequency and depth of checking required.</p>

<p>Question 83: What would you suggest is a sufficient threshold for the reporting timeframe to the local Fire and Rescue Services?</p>
<p>The RIBA believe that evidence from the Fire and Rescue Services, and other professional bodies, such as facilities management bodies, alongside tenant associations, would provide a body of knowledge that could be used to determine the most appropriate reporting times.</p>
<p>Question 84: To what extent do you agree that the proposal should cover all lifts within a building?</p>
<p>Strongly agree. The RIBA support the proposal to maximise the safety of residents by requiring RPs to undertake regular checks of all lifts in relevant buildings, including those which may not been specifically designed for use by fire-fighters.</p>
<p>Question 85: To what extent to you agree that the proposal should cover other pieces of key fire-fighting equipment?</p>
<p>The RIBA support the proposal to require RPs to undertake regular inspections or tests of other pieces of fire-fighting equipment in a high-rise building which are also critical in the event of a fire, for example dry risers and smoke control systems.</p> <p>The RIBA believe that the Home Office should gather specific evidence from manufactures, the Fire and Rescue Services and facilities management bodies, to provide relevant data in order to determine the most appropriate inspection / test frequency.</p>
<p>Question 86: What other pieces of key fire-fighting equipment, excluding lifts and the mechanism with through which fire-fighters can take control of the lifts, would you suggest should be included in this proposal (therefore tested or inspected every month and reported to the local Fire and Rescue Service in the event of failure)?</p> <p>a) Dry risers; b) Wet risers; c) Smoke control systems; d) Suppression systems (including associated operating instructions); and e) Other (please specify).</p>
<p>The RIBA recommends that the following, key fire-fighting equipment, is also included within the proposal for regular testing:</p> <ul style="list-style-type: none"> • Centrally addressable fire alarm systems (detection and alert) • Emergency lighting • Evacuation equipment • Door activations (for example: electronic and manual door releases, door closers)
<p>Question 87: To what extent do you agree that the proposal should be extended to include a requirement for information about the monthly checks to be made visible to residents?</p>
<p>Tend to agree. The RIBA supports the proposal to include a requirement for information about fire safety checks to be made visible to residents. The RIBA recommends that further consultation is undertaken with facilities management bodies and residents, including tenant associations, to identify what information should be visible (scope, depth and detail), as well as what triggers a report.</p>

See RIBA response to Question 82, which highlights further consultation with relevant parties to assist in determining the frequency of testing / checking. This should also be applied to key fire-fighting equipment as outlined in Question 86.

Question 88: Do you have any other comments to further support your answers above?

No comment.

2.6 Evacuation Plans

Question 89: To what extent do you agree with the proposed approach to make regulations as described above? Please explain.

Strongly agree. The RIBA supports the proposal to require that relevant RPs draw up and keep under regular review evacuation plans, copies of which are to be sent electronically to Fire and Rescue Services and placed in a Premises Information Box on site.

Question 90: Do you think this proposal should be extended to cover all multi-occupied residential buildings of 11 metres and above? Please explain.

The RIBA supports the extension of the proposal to require that relevant RPs draw up and keep under regular review evacuation plans, to include all multi-occupied residential buildings of 11 metres and above.

The MHCLG consultation on the review of the ban on the use of combustible materials in and on the external walls of buildings included consulting on applying the ban to relevant buildings with a storey at least 11 metres above ground level, and extending the scope to all buildings with a room for residential purposes. Approved Document B (Volume 1) was amended in May 2020, to require sprinklers and other fire safety measures in dwellings with a storey at least 11 metres above ground level.

These changes and proposals clearly indicate that high-rise multi-occupied residential premises with a storey at least 11 metres above ground level, are considered higher risk.

Question 91: What information do you think should be included in an evacuation plan?

The RIBA recommends that the evacuation plan should identify the evacuation strategy that the building has been designed to follow, for example stay put, phased evacuation, or simultaneous evacuation. There should be additional information on what alternative strategy can be followed, enabled through the design of the building, if the initial strategy (e.g. stay put) must be abandoned.

Question 92: Do you have any other comments to further support your answers above?

No comment.

2.7 Personal Emergency Evacuation Plans

Question 93: To what extent do you agree with the proposed approach to make regulations as described above? Please explain.

The RIBA support the proposal to deliver the Inquiry's underlying objective that residents who need help to evacuate in the event of fire can access that assistance, by including (with consent) their information within the premise's information box. However not all residents will identify themselves as requiring assistance or provide consent, including visitors.

The RIBA recommends that the Home Office should also consider a more holistic approach to the use of General Emergency Evacuation Plans (GEEP), that can be provided to the Fire and Rescue Services and made available to residents, outlining appropriate emergency evacuation procedures for visitors and unidentified residents who cannot evacuate themselves.

Question 94: To what extent do you agree that a RP should notify their local Fire and Rescue Service of any residents who cannot self-evacuate (subject to the resident's consent and self-identification)?

Strongly agree. The RIBA supports the proposal that RPs in high-rise residential buildings provide relevant details of residents who self-identify as requiring assistance to evacuate to local Fire and Rescue Services. The RIBA recommends that direct consultation is undertaken with facilities management bodies, the Fire and Rescue Service and residents, including tenant associations, to help inform the deliverability of this proposal.

Question 95: What information, other than location, do you think should be provided to Fire and Rescue Services in relation to residents who cannot self-evacuate?

The Personal Emergency Evacuation Plans (PEEP) should adequately identify the needs of the resident, along with the equipment locations and any relevant limitations.

Question 96: To what extent do you agree that a Responsible Person should notify their local Fire and Rescue Service of any residents who cannot self-evacuate (subject to the resident engagement, resident self-identification and consent)?

Please see RIBA response to Question 94.

Question 97: Please indicate what information you would like to see included in the supporting guidance?

Supporting guidance should provide clear requirements for what should be covered, including how information should be presented. The RIBA recommends that guidance should assist RPs to provide relevant information, for example, the support needs of the resident, equipment locations and any limitations on using the equipment (with that person, or in that location).

The RIBA recommends that there should be a protocol for advising the Fire and Rescue Service if someone has been evacuated when they arrive.

Q98. Do you have any other comments to further support your answers above?

The RIBA recommends that PEEP's should be provided for all people who identify as having needs. These plans should be reviewed with the individual and the potential to evacuate should be outlined to the individual as well as equipment which may be available. Those who live with relatives or carers need informed information to enable self-evacuation to be a potential.

2.8 Information to Residents

Question 99: To what extent do you agree with this proposed approach to make regulations as stated above? Please explain.

Tend to agree. The RIBA supports the proposal to require RPs to provide residents of all multi-occupied residential buildings with the fire safety information (including instructions for evacuation) in a form that they can reasonably be expected to understand, taking into account the nature of the building. The RIBA appreciates that the RPs knowledge of their residents may assist them in developing this information, but there should specific guidance to ensure that RPs provide information in structured format.

The RIBA recommends that the rather than each RP outlining their responsibilities, the Home Office should provide standard guidance that they can use, which outlines their responsibilities under the FSO. This avoids the potential for RPs to outline different scopes and omit or fail to identify specific responsibility's, as well as creating clarity across the sector for the scope of the role.

The RIBA has identified a potential issue where RPs are required to provide instructions for evacuation to residents, including other fire safety information. Where leaseholders may receive this information (using ownership details held by the building owner), those that rent a property (including any short term lets or Airbnb), or visitors, will not have this information, as it may problematic for RPs to identify such changes in residential occupation (without notification). The RIBA recommends that consideration is given to how fire safety information is managed, to ensure all residents and visitors have access to this information.

Question 100: Other than the information already listed under Proposals 25 and 26, what other information or instruction should be provided to residents?

a) "nature of the building", and

No Comment.

b) the RPs "knowledge of the occupants"?

No Comment.

Question 102: Please indicate what information you would like to see included in the supporting guidance?

No Comment.

Question 103: Do you have any other comments to further support your answers above?

No Comment.

2.9 Fire Doors

<p>Question 104: To what extent do you agree with this proposed approach as described above?</p>
<p>The RIBA supports the proposal for the RP to undertake checks, but the RIBA recommends that these checks are required at the same frequency for all multi-occupied residential buildings, where the top floor is more than 11m, or more than three storeys, above ground level (whichever is reached first). The RIBA recommends only using the higher frequency intervals for required checks currently proposed for buildings of 18m and above.</p> <p>The RIBA advises that a requirement for RPs to undertake prescribed checks to ensure effective self-closing devices are in working order would not discharge the RPs duty to carry out a suitable system of maintenance for fire doors (Article 17 of the Fire Safety Order), which may lead to a false sense of security.</p>
<p>Question 105: Do you have any other comments to further support your answer?</p>
<p>The MHCLG consultation on the review of the ban on the use of combustible materials in and on the external walls of buildings included consulting on applying the ban to relevant buildings with a storey at least 11 metres above ground level, and extending the scope to all buildings with a room for residential purposes. Approved Document B (Volume 1) was amended in May 2020, to require sprinklers and other fire safety measures in dwellings with a storey at least 11 metres above ground level.</p> <p>These changes and proposals clearly indicate that high-rise multi-occupied residential premises with a storey at least 11 metres above ground level, are considered higher risk.</p>
<p>Question 106: Please note any factors we should consider in the implementation of these proposals.</p>
<p>No Comment.</p>
<p>Question 107: Please provide any additional comments on the related matters on which we are seeking views.</p>
<p>No Comment.</p>
<p>Question 108: To what extent do you agree with this proposed approach as described above?</p>
<p>No Comment.</p>
<p>Question 109: Do you have any other comments to further support your answers above?</p>
<p>No Comment.</p>
<p>Question 110: Please note any factors we should consider in the implementation of these changes in this proposal?</p>
<p>No Comment.</p>
<p>Question 111: Please provide any additional comments on the sufficiency of the Government's actions to date to address the Inquiry's concerns.</p>
<p>No Comment.</p>

2.10 Non-legislative Grenfell Tower Inquiry Phase 1 recommendations and alignment with Approved Document B

Question 112: To what extent do you agree that the installation of sprinklers in existing buildings should continue to be guided by the fire risk assessment process rather than be made mandatory under the FSO?

In the RIBA response to the consultation on sprinklers and other fire safety measures in new high-rise blocks of flats, published by the Ministry of Housing, Community and Local Government, the RIBA recommended stated that sprinklers/automatic fire suppression systems are a highly effective means of life protection, and recommended:

- a regulatory requirement for sprinklers/automatic fire suppression systems in all new and converted buildings that include a 'dwelling' or a 'room for residential purposes' (regardless of height, as already required in Wales), and;
- a regulatory requirement for sprinklers/automatic fire suppression systems in all existing buildings that include a 'flat' or a 'room for residential purposes' as 'consequential improvements' where a building is subject to 'material alterations'.
- that sprinklers should not be used as a means to compensate other key life safety measures or justify reducing minimum standards.

Following the Governments analysis of the responses to the consultation, an amendment to Approved Document B (fire safety) Volume 1: Dwellings 2019 edition was published, reducing the trigger height at which sprinkler systems would be required from 30m to blocks of flats with a top storey more than 11m above ground level. The RIBA recommends that the Home Office consider applying a requirement for sprinklers to be included in existing blocks of flats using the same threshold as the latest technical guidance in Approved Document B.

Details of Evidence Provided

- RIBA response to the consultation on sprinklers and other fire safety measures in new high-rise blocks of flats
<https://www.architecture.com/-/media/GatherContent/Test-resources-page/Additional-Documents/RIBAResponseMHCLGSprinklersConsultation2019pdf.pdf>

Question 113: To what extent do you agree that regulations should be made requiring wayfinding signage to be introduced in multi-occupied residential buildings?

The RIBA recommends that there should be a consistent approach to wayfinding signage to assist fire fighters and other rescue teams to evacuate occupied areas during emergency situations.

In our response to the MHCLG consultation on sprinklers and other fire safety measures in new high-rise blocks of flats, we recommend that the MHCLG and the Home Office consider the requirement for wayfinding signage for Fire and Rescue

Services in all existing blocks of flats of any height, applied through the Fire Safety Order.

As part of this response, the RIBA recommended that consideration was given to the requirement for additional wayfinding signage to assist residents and visitors in the event of a fire, as evacuees will have a reliance on signage to guide them to a place of safety outside the building. The requirement for resident signage in high rise buildings was raised in both Coroner's Rule 43 letters (Lakanal House: March 2013 and Shirley Towers: April 2013).

Details of Evidence Provided

- RIBA Response to MHCLG consultation on sprinklers and other fire safety measures in new high-rise blocks of flats
<https://www.architecture.com/-/media/GatherContent/Test-resources-page/Additional-Documents/RIBAResponseMHCLGSprinklersConsultation2019pdf.pdf>
- Francis Kirkham CBE, Coroner's Rule 43 Letter, Lakanal House, March 2013
<http://modern.gov.southwark.gov.uk/documents/s37765/Appendix%201%20Coroners%20Rule%2043%20Letter.pdf>
- K St J Wiseman, Coroner's Rule 43 Letter, Shirley Towers, Hampshire, April 2013
<https://www.shropshirefire.gov.uk/sites/default/files/11-coroners-rule-43-letter.pdf>

Question 114: Should the requirement for wayfinding signage be introduced in:

- a) all multi-occupied residential buildings; or
- b) multi-occupied residential buildings of 11 metres and above?

Please see RIBA response to Question 113.

Question 115: To what extent do you agree any requirement for evacuation alert systems should be informed by the outcome of the programme of research and testing?

In the RIBA response to the MHCLG consultation on sprinklers and other fire safety measures in new high-rise blocks of flats, we recommended a requirement for centrally addressable fire alarm systems (integrating detection and alert):

- in all new and converted buildings that include a 'flat' or a 'room for residential purposes' of any height, and;
- in all existing buildings that include a 'flat' or a 'room for residential purposes' as 'consequential improvements' where a building is subject to 'material alterations'

A centrally addressable fire alarm system, with a fire alarm control panel (located on the ground floor of the building in a protected space or room), will provide the Fire and Rescue Service with vital information of the location of a triggered detector(s), and in turn informs the process and strategy used by the Fire and Rescue Service in determining the most appropriate managed evacuation procedure (for example, phased evacuation or simultaneous evacuation).

See the RIBA response to the MHCLG consultation on sprinklers and other fire safety measures in new high-rise blocks of flats, which provides technical considerations for alerting the fire service, evacuation strategies, stairway and firefighting operations, RIBA layers of fire safety, and related evidence.

The RIBA support a proposal for a programme of research and testing, to specifically identify how the system should be designed and used to ensure effectiveness and safety, but not to undermine the recommendation for the requirement for centrally addressable fire alarm systems (integrating detection and alert).

3.7 Fire Safety Information (Regulation 38)

Question 132a: To what extent do you agree that the application of Regulation 38 should be extended to material alterations and/or other types of building work?
Strongly agree. The RIBA recommends that the application of Regulation 38 should be extended to all material alterations.
Question 132b: If you agree, please specify which types of work.
No Comment.
Question 133: To what extent do you agree that the building control body should have to approve the fire safety information to be handed over?
Tend to Agree.
Question 134: To what extent do you agree that a review of the Regulation 38 information should be included in any formal consultation requirements between the building control body and the Fire and Rescue Authority prior to the issue of a completion or final certificate?
Tend to Agree.
Question 135: To what extent do you agree that there should be a requirement for the developer to provide a formal notice to the building control body that fire information has been handed over (including confirmation from the Responsible Person to that effect)?
Tend to Agree.
Question 136: To what extent do you agree that further guidance would be useful, for example through a British Standards such as BS 8644?
Tend to Agree.
Q137. Overall, please state which of the three options is your preference.
<ul style="list-style-type: none"> a) Option 1; b) Option 2; c) Option 3; or d) None.
No Comment.
Please explain the reason/s for your preference:
No comment.