

Chartered Institute of Housing response to the government consultation on sprinklers in care homes, removal of national classes, and staircases in residential buildings

Initial comment

The Chartered Institute of Housing (CIH) welcomes the actions the government is taking to improve building regulations and ensure that all new buildings are constructed to high safety standards. In this consultation we are only responding to the section on staircases in residential buildings.

Staircases in residential buildings

Question 19 - Do you agree that Approved Document B should include a maximum threshold for the provision of a single staircase in residential buildings?

Agree

Question 20 - Do you agree with our proposed threshold of 30 metres+?

Disagree

Question 21 - If you disagree with the proposed threshold, at what height do you think the threshold should be set?

18 metres

Question 22 - What evidence do you have to support this threshold?

The National Fire Chiefs Council (NFCC) has [called on the government](#) to set the threshold for second staircases at 18 metres or seven storeys for new buildings. They argue that this will improve safety for both residents and firefighters during an evacuation, and provide continuity of message and clarity across the new building safety regime, as it aligns with definitions and new requirements introduced in the Building Safety Act and the Fire Safety (England) Regulations. It will also create greater consistency across the UK, as Scottish building regulations already require at least two escape staircases in buildings over 18 metres.

It has been clear from the findings of the Grenfell Tower inquiry that relying on a stay put policy in high-rise buildings carries significant risk. Even though

requirements of the new building safety regime should mean that building owners more regularly assess the components of the building which are designed to prevent fire spread (fire doors, compartmentation features etc.), there will still be a risk that these features become compromised. In these circumstances, during a fire it may be necessary to move from the stay put policy to an emergency evacuation. Tall buildings should be designed to allow safe evacuation, which should include the provision of a second staircase.

We wrote in support of personal emergency evacuation plans in response to previous Home Office consultations on a similar basis, that it would support residents to be able to evacuate safely in an emergency.

Question 23 - Do you agree that additional measure should be provided to ensure sufficient separation between staircases?

Agree

Question 24 - What additional measures should be provided to ensure the appropriate separation between staircases? Please provide any additional evidence to support your view

We have no further comment.

Question 25 - Do you have a view on how long the transitional should be, and what evidence do you have to support your proposed transition?

We agree that a short transition period is appropriate for this change, to prevent (as far as possible) developers from pushing plans forwards to avoid the additional costs of including a second staircase in their designs. This will work best to protect the safety of future residents.

Question 29 - Are you aware of any particular equalities impacts for these proposals? How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence to support your response.

Measures to ensure that residents can evacuate safely are particularly important for people with disabilities and illnesses (including elderly people) which could limit their ability to evacuate safely without assistance. A second staircase provides more space and better opportunities for residents to use evacuation support devices, with or without the assistance of firefighters. Without such measures, people with disabilities face an increased risk of injury or death during the fire; 40% of the disabled residents in the Grenfell Tower died as a result of the fire.

About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org.

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