

RIBA Fire Safety Policy Note

February 2022

The Royal Institute of British Architects champions better buildings, stronger communities and higher environmental standards through the practice of architecture and our 40,000 members. We provide the standards, training, support and recognition that put our members – in the UK and overseas – at the peak of their profession. With government and our partners, we work to improve the design quality of public buildings, new homes and new communities.

Building Safety Bill

Changes need to be made to the design of the proposed new building safety system to provide greater clarity on who is responsible for key decisions:

1. The **appointment of the Principal Designer to be required at Gateway 1** (planning) on higher risk buildings, as key fire safety strategy decisions are made at this stage.
2. **Wording of the statutory duties to be modified to avoid creating uninsurable duties** on designers, contractors, Principal Designers and Principal Contractors - not to include absolute obligations (“ensure” etc.) but rather “so far as reasonably practicable” obligations, as with the existing CDM Regulations.
3. Clearer **guidance on requirements for “monitoring” construction compliance** is required, especially in the design and build contractual context.
4. **Clear publicly available specifications covering the skills, experience and certifications required to act as Principal Designer** are needed. The RIBA believes that in the majority of cases an architect will be the best placed designer to perform the role.

Building Regulations

The building regulations and approved document guidance and associated British Standards need to be updated to reflect construction and insurance industry views on best practice in higher risk buildings:

5. **Sprinklers/automatic fire suppression systems** should be required rather than recommended in new and converted residential buildings above 11m from ground level and as ‘consequential improvements’ where a residential building above 18m is subject to ‘material alterations’. We recommend the broader use of sprinklers across new and converted buildings particularly where there is a higher risk to vulnerable occupants such as the elderly and children.
6. **Further study of the fire safety of residential buildings with a single means of escape** should be undertaken. The Building Safety Regulator should urgently investigate whether a single means of escape provides for adequate access for firefighters and evacuation of residents in residential buildings and at what height an additional means of escape should be required.

7. A requirement introduced for **centrally addressable fire alarm systems** in new and converted residential buildings above 11m from ground level and in all existing residential buildings above 18m from ground level as 'consequential improvements' where a building is subject to 'material alterations'.
8. **Restrictions on combustible materials** on residential buildings over 11m.
9. Government investment in independent, **large-scale fire safety testing** of new materials and construction methods to investigate real world application and use of materials rather than laboratory conditions.
10. A full **review of Approved Document B** should encompass the provisions on sprinklers/automatic fire suppression systems, central alarms/evacuation sounders, means of escape and travel distances, restrictions on the use of combustible materials and toxicity in fire.
11. **Building regulations and guidance must deliver more prescriptive routes to compliance for higher risk buildings.** The lack of clarity and scope for a broad range of interpretations of how to meet fire safety regulations has led to significant gaming of the rules.

Fire Safety Remediation:

The Government needs to acknowledge regulatory failure and take action to address the impacts on those affected:

12. **Proposals to extend the Defective Premises Act are misguided** – and will have very negative impacts on the insurability and risk appetite of the construction sector even where no faults are found.
13. The **establishment of a comprehensive building safety fund** to address fire safety failings in the construction of buildings - not just the use of combustible materials - that create unacceptable fire risks.