



Consultation: Sprinklers in care homes, removal of national classes, and staircases in residential buildings

G15 Response



About the G15

The G15 is made up of London's largest housing associations. The G15's members provide more than 715,000 homes across the country, including around one in ten homes for Londoners. Delivering good quality safe homes for our residents is our number one priority. Every year our members invest almost £900m in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and build around 15% of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Catalyst
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Network Homes
- Notting Hill Genesis
- One Housing
- Peabody
- Southern Housing

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Introduction

The safety and wellbeing of our residents is our absolute priority and as an organisation of London's leading housing associations, we are continuously working to ensure the homes we provide are of the highest possible standard. The G15 supports the recommendations for second staircases in residential buildings of 30 metres and above.

We are now calling on the Government to urgently clarify the specified purpose of a second staircase, the technical requirements, and the transitional period for the implementation of these proposals. This clarity is vital to the long-term planning of the sector and our continued ability to deliver the affordable and social housing we as a nation need.

Whilst welcoming the proposals, challenges are presented as a result. This includes additional design costs, the requirement to submit new planning applications, and the challenges to the viability of developments. There is particular concern for areas of high existing use values, such as London, which will result in a reduction of affordable homes that can be delivered on schemes. Service charges are also likely to increase to account for additional costs, which impact residents.

Urgent clarification of the full requirements and implementation of these proposals is needed. This would assist in efforts to limit the risk of reducing the number of affordable and social homes delivered by damaging the viability of development and reducing the space to develop these new homes. However, government should also consider what additional grant funding can be made available to minimise the impact these proposals will have on scheme viability and affordable home delivery. This is a particular issue in London and other urban areas where taller buildings are more common and are critical to meeting ever growing housing demand.

It is also vital that messaging surrounding these requirements does not falsely imply that existing buildings without a second staircase are intrinsically unsafe. This is not the case and any suggestion to the contrary could cause unnecessary distress to residents, and damage confidence of investors, insurers, and mortgage providers.

A suitable transitional period – including the ability to continue developing unaffected schemes with confidence and certainty – to enable the best possible implementation is therefore required. The Government must engage with the G15 and the wider sector to determine a suitable length for a transitional period and the smoothest possible implementation of these proposals.



Comments on specific consultation questions

Staircases in residential buildings

Q19: Do you agree that Approved Document B should include a maximum threshold for the provision of a single staircase in residential buildings?

The G15 agrees with these proposals.

Q20: Do you agree with our proposed threshold of 30 metres+?

The G15 agrees with these proposals. We are now calling for the Government to urgently provide clarity on the technical requirements, the purpose of the new staircase, and the transitional period for implementation of these proposals.

For example, will the purpose of the second staircases be for firefighting (with use restricted to the fire service) or for the purpose of evacuation?

Additionally, the new requirements will inevitably present challenges to housing providers in terms of build and design costs, planning applications, reallocation of space and service charges for residents.

These factors will threaten the viability of many developments with some G15 members stating that some of their plans are currently unviable under these proposals without further clarity and assurances from the Government. This will lead to a reduction in the number of new affordable and social homes delivered.

One area of particular concern for members is the impact on the viability of developments already in the planning stage with land bought on the basis of assumed construction costs alongside sales and rental income.

It is there vital that the sector is given clarity as a matter of urgency and that a suitable transitional period is determined through engagement between the Government, the G15 and the wider housing sector.

Q25: Do you have a view on how long the transitional should be, and what evidence do you have to support your proposed transition?

To support the sector and to ensure smooth implementation of the 30m+ requirements, we are calling for clarity on the following areas:

- technical requirements of second staircases



- primary usage of the second staircase; if it is intended for escape, fire service access or both
- requirement for additional firefighting lifts or evacuation lifts
- lobbies
- pressurisation
- firefighting apparatus
- the type of stair required and where it should be located in relation to the primary core

This would allow for planned development to go ahead without adaptation and the standards apply to new projects. If the standards applied to planned measures assumed costs and designs would need to be reviewed and assessed against feasibility which would slow or reduce development. We also propose flexibility in our funding arrangements through the Affordable Homes Programme (AHP) to allow for delays associated with additional changes.

Assessment of Impacts

Q28: Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts in the following areas.

c) The G15 supports the recommendations of a second staircase in building of 30 metres+. We do expect the following challenges to result from this new requirement:

- additional design and build costs
- reallocation of space affecting the viability of some developments potentially affecting the delivery of affordable housing
- requirements to submit new planning applications
- risks around building control applications and statutory consultees bringing forward additional opinions and requirements if these are not fully addressed in the resultant changes to Building Regulations Guidance (Part B)
- an increase service charges to account for the additional costs
- the perception that existing buildings of 30m+ without a second staircase could cause distress amongst residents and affect investor and mortgage provider confidence in the sector

These issues emphasise the importance of engagement between the Government, the G15 and the wider sector to ensure a suitable transitional period, with aligned mutual understanding and messaging, enables for the best possible implementation of these proposals.

Furthermore, G15 members have expressed concerns that, without a suitable transitional period, these proposals risk conflicts between housing associations and



certain requirements and aspirations set through planning policy and grant funding conditions.

Members are already encountering such conflicts with the GLA's design requirements within the London Plan (planning policy) and Affordable Housing Programme 2021-26 (grant funding conditions) – specifically the maximum limit of eight homes per core, and requirements/aspirations for homes to be dual aspect. We would therefore ask the government to liaise with GLA and other planning and funding authorities, to help agree a pragmatic resolution where conflict has arisen/is likely to arise

Sprinklers in care homes

Q4: Do you agree that sprinklers protection should be extended to new care homes of any height?

The G15 agrees with this proposal.

Q6: We welcome views on whether there are any exemptions you would include, what they are, and your evidence supporting their exclusion.

The G15 does not agree with exemptions, rather we don't think these measures go far enough. We propose that the Government considers including sprinklers in other forms of housing where residents may have similar challenges in evacuating a building such as Extra Care housing.

Q7: Do you agree that Approved Document B should remove the current allowances when sprinklers are provided?

The G15 agrees with this proposal.

Q8: Which allowances do you think should be provided and what evidence do you have to support your view?

We don't agree with allowances for sprinklers. Sprinklers should be used as an added benefit to improve resident safety and not a tool to withdraw other measures.

Q9: Do you agree that Approved Document B should recommend sprinklers to the new BS 9251:2021 standard?

The G15 disagrees with this proposal.

Q10: If you disagree, what other standards would you suggest, and what is your evidence to support using the alternative standards?



We believe this is short-sighted as sprinklers are not the only form of fire suppression. We are aware of improvements made in water misting systems and propose the standards should include flexibility to encourage and support future innovation.

Q11: Do you agree that there should be a transitional period of 6 months?

The G15 disagrees with this proposal.

Removal of national classifications

Q13: Do you agree that the national classifications for reaction to fire should be removed from Approved Document B?

The G15 agrees with this proposal.

Q14: Do you agree that the national classifications for fire resistance should be removed from Approved Document B?

The G15 agrees with this proposal.

Q16: Do you agree that there should be a transitional period of twelve months?

The G15 disagrees with this proposal.

Q17: If you disagree, how long should the transition period be and what is your evidence to support a longer or shorter transition period?

The Government should consider an appropriate notice period for industry before the proposed removal of BS 746 from Approved Document B takes effect. There is no need to rush through this change – fire doors which are built to BS 476 rather than BS EN 13510 are not any less safe.

Any transition to the BS EN 13501 needs to give adequate warning to the affected sectors so they can prepare, amend designs, arrange testing etc. before they come into place to avoid any shortfalls in supply.

We suggest a period of between three and five years.

Q18: Please outline any concerns you have about the withdrawal of the national classification with regards to fire resistance including potential impacts, such as on the fire door industry.



The G15 welcomes the new standard if it provides additional fire safety and reassurance to residents. However, we believe that fire doors which are built to BS 476 rather than BS EN 13510 are not less safe but will need to be tested to this standard.

It is not clear if the Government expects them to be compatible to this new standard. However, if they do not meet the standard, we expect many providers will upgrade their fire doors. The exact impact this would have on costs is very difficult to estimate. However, this process would be costly, time-consuming and could potentially lead to supply shortages and cause uncertainty among residents and insurers about the safety of their homes. BS 476 is also used to test many other building materials, plasterboard, glazing, fire stopping products all of which could be negatively affected.



Conclusion

As stated throughout our evidence, the G15 supports the recommendations for second staircases in residential buildings of 30 metres and above. Our absolute priority is the safety and wellbeing of our residents and we will continue to work to ensure the homes we provide are of the highest possible standard.

The Government must now urgently clarify the specified purpose of a second staircase, the technical requirements, and the transitional period for the implementation of these proposals. This clarity is vital to the long-term planning of the sector and our continued ability to deliver the affordable and social housing we as a nation need.

Urgent clarification will help the sector to mitigate the risk associated with these proposals including a reduction in the number of affordable and social homes delivered. The Government should also consider what additional grant funding can be made available to minimise the impact that these proposals will have on scheme viability and affordable and social housing delivery.

We would also reiterate the importance of messaging surrounding these requirements. Buildings of 30 metres and above without a second staircase are not intrinsically unsafe and this must be made clear as part of the implementation of these proposals to avoid any unnecessary distress to residents and damage to the confidence of investors and mortgage providers.

The Government must now engage with the G15 and the wider sector to determine a suitable transitional period to help to ensure the smoothest possible implementation of these proposals.