



Single Staircases Policy Position Statement

The National Fire Chiefs Council (NFCC) believe that buildings should be suitable for the people who live in them, rather than people having to be 'suitable' for buildings, and that this should include multiple protected staircases in new tall residential buildings.

NFCC believe, that 18 metres¹ or has at least 7 storeys must become the threshold at which more than one staircase should be required in new residential buildings, and that this threshold should be kept under review alongside other situations addressing these issues, including evacuation management and lifts.

England is one of the few countries in Europe, Australasia, or North America without a height limit on single staircase residential buildings. Single staircase residential buildings require additional justification and fire safety provisions beyond the requirements of existing guidance to account for the changing behaviour of occupants and modern use of buildings. However, even with additional fire safety provisions, NFCC believe there is a limit to where single staircases should be relied on.

Multiple protected staircases create more resilience to support evacuation and firefighting operations. The need for unambiguous guidance is particularly important given the clear problem with culture and competency identified across the design and construction industry since the Grenfell Tower fire tragedy.²

An 18 metre or has at least 7 storeys threshold would provide continuity of message and clarity across Government, aligning with definitions in the Building Safety Act as well as thresholds for certain provisions in the Fire Safety (England) Regulations and the Government's ban on the use of combustibles materials. This would also help to synchronise standards across the United Kingdom by aligning to rules in Scotland. While arguments exist for a range of thresholds, both higher and lower, 18 metres or has at least 7 storeys would bring the greatest harmonisation with the wider regulatory environment in the United Kingdom, and the greatest simplicity and certainty for industry at this time.

NFCC have highlighted the need to review this and other thresholds for several years. We have developed this position statement to clearly present our views on staircase design, and to highlight the importance of this issue and where guidance should change. The introduction of a single staircase height threshold could also be complemented by reviewing the rules applying to evacuation lifts.

Five years on from the Grenfell Tower fire, NFCC are disappointed that not enough progress is being made with the full technical review of the Approved Document B guidance. Government must ensure that tall residential buildings are not built by seeking convenient interpretations or loopholes in guidance, or by utilising guidance not intended for buildings of that height.

Buildings which are built, maintained, used, and managed as intended should enable residents to evacuate safely in the event of a fire, and multiple protected staircases make tall buildings safer by design. However, it will be impractical in many cases to make such an alteration to existing premises. By delivering this position statement, we set out a plan that stops more tall single staircase buildings from being built. We must stop adding to the existing stock of single staircase buildings that may in future require additional or costly management practices. This will also provide the benefit of enabling fire and rescue services (FRSs) to direct their resources towards a known level of demand when regulating and

¹ Buildings with a top storey more than 18m above ground level.

² [Independent Review of Building Regulations and Fire Safety: final report](#) – Ministry of Housing, Communities and Local Government.

responding to fires in these premises. This does not mean existing residential buildings with a height over 18 metres and with a single staircase are inherently unsafe, or that multiple protected staircases alone ensure a reasonable standard of fire safety.

However, the current system allows for many designs to rely too heavily on management practices to ensure that they work effectively in occupation. This means that many buildings are only as safe as their management while, at the same time the speed of change with the way we use buildings, construction methods, and the fire loading within modern homes has outpaced design guidance. Given the known issues with culture and competency that have been identified, the intention of this recommendation is to improve safety by creating additional resilience in new buildings. A minimum of two protected staircases provides additional escape routes for residents and additional access routes for firefighters.

Recommendations

- Government should adopt a requirement that new buildings 18 metres or has at least 7 storeys and above in height must have more than one staircase.
- Government should immediately clarify the intended scope of Approved Document B and introduce clear and unambiguous definitions of 'common building situations'.
- Government should immediately publish a clear deadline, and more detailed workplan, for the completion of the full technical review of Approved Document B.
- Government should adopt a requirement that all passenger lifts that are due to be replaced or installed in new or existing tall buildings should be evacuation lifts.
- Government should ensure that comments made by the FRS during building regulations consultations cannot continue to be ignored by those receiving them, by introducing a duty to respond to, any comments made by the FRS and to demonstrate how they have been addressed.
- Government should make it a requirement to retrofit sprinklers in all residential buildings over 18 metres or has at least 7 storeys, that are served by a single staircase.

Building Regulations Guidance

At present, there is no formal 'limit' in statutory fire safety guidance used in England for the height of a residential building served by a single staircase. England is one of few countries in Europe, Australasia, or North America without a limit.

Within the United Kingdom, there are also discrepancies between the requirements of individual countries with the Scottish Technical Handbook requiring at least two escape staircases in buildings over 18 metres. The Scottish Technical Handbook is itself limited in scope to buildings up to 60 metres in height for all fire safety provisions.

We would support the acceptable height threshold being lower in some cases dependent on factors such as the number of flats per floor and the travel distances to staircases. Whether or not multiple protected staircases should be required below 18 metres should be assessed on a case-by-case basis, with consideration of what additional measures have been proposed by the design team.

Concerns remain that statutory guidance, such as the Approved Documents, are viewed as being the maximum required standard, and that following this guidance will equate with meeting the functional requirements of the Building Regulations. While the Approved Documents themselves state that this is not the case and restrict their scope to 'common building situations', Approved Document B does not define what falls within the scope of that term. The status of the Approved Documents is not well understood. Dame Judith found that "*the cumulative impact of the Approved Documents changes an outcome-based system of regulation to one that is often inferred by users to be prescriptive*".

NFCC members have reported cases where design teams have proposed a tall residential building with a single staircase yet have not analysed whether that arrangement is even appropriate. Some of these designs have been in excess of 200 metres in height, and are presented on the basis that the design is common and they are following Approved Document B. This is despite Government guidance³ that Approved Document B is not intended to be used for designs of 'very tall' buildings. If a clear threshold was set within Approved Document B itself, this would avoid the practice of misinterpreting the scope of the guidance. This should include a proper definition of 'common building situations'.

The secondary legislation to the Building Safety Act, supported by appropriate guidance, also needs to be clear what the benchmarks will be, and that regulators can require measures that go beyond the minimum standards set out within Approved Documents where it is appropriate to do so. This should clarify beyond any doubt that, for buildings in scope of the new regime, the benchmark for compliance with the future Safety Case can go beyond any guidance set by the Approved Documents.

A building is only as safe as its management. We would reiterate that a building's design, construction, and fabric is underpinned by the assumptions on usage and management when it is completed. These assumptions underpin the approvals, information requests, and safety advice given in the construction and build stage of the building.

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Evacuation

The stay put evacuation strategy typically applied by design teams to blocks of flats remains appropriate for most tall residential buildings that are built and maintained correctly. However, if people need to, choose to, or are instructed to evacuate, they should be able to do so safely. This is a principle that is explicit in statutory guidance, such as Approved Document B, when designing for a stay put strategy. Design teams may be designing buildings on the incorrect assumption that only the occupants of the flat where the fire starts will leave, and no one else in the building will seek to do so. However, more people are choosing to leave when a fire occurs elsewhere in their building, and anyone who chooses to leave should be able to do so safely.

In the three years from 1st April 2019 to 31st March 2022, the London Fire Brigade reported 154 cases where 10 or more people evacuated from a block of flats of at least 6 storeys. Those 154 cases meant that nearly 8,500 residents chose to evacuate either before the London Fire Brigade arrived, or during a fire incident. These figures do not include the instances where less than 10 people evacuated.

In looking at the policy in other nations, evacuation and resident safety is one of the common themes within the justification for the policy. The Australian government stated that the purpose of the requirement for two staircases is to maximise the opportunities for people to have the means to escape from the building in an emergency. In an emergency, leaving buildings can be very difficult especially in tall or large buildings, or small buildings which have a complex passageway design.

The Canadian government stated two purposes for their requirement. The first is to limit the probability that people will not have an alternative exit in the event that one exit is blocked or obstructed in an emergency situation, which could lead to delays in the evacuation or movement of people to a safe place, which in turn could lead to injuries or fatalities.

³ [Manual to the Building Regulations: A code of practice for use in England.](#)

The second is to limit the probability that emergency responders will not have a choice of an alternative exit route in the event that one exit route is blocked or obstructed in an emergency situation, which could lead to emergency responders being delayed in gaining access to a floor area, resultant delays or ineffectiveness in emergency response operations, which could in turn lead to delays in the evacuation or movement of people to a safe place.

Physiological trials have shown there is a limit to the height firefighters can ascend to in a building before the physiological impact is likely to affect their ability to carry out firefighting operations. It is, therefore, imperative that tall buildings are designed with a suitable level of resilience without single points of failure to allow residents to evacuate in cases where firefighting operations may be delayed by defective fire safety measures in the building, such as firefighter's lifts not being available.

The introduction of a single staircase height threshold could be complemented by also reviewing the rules applying to evacuation lifts. Our members have reported to us many occasions where developers could easily include evacuation lifts at marginal additional cost to their projects during replacement of old lifts or in new designs. However, many choose not to, and non-worsening provisions within the Building Regulations make this difficult to enforce.

NFCC has recommended to Government that it introduce a requirement to consider improving fire safety measures, such as means of escape, so far as is reasonably practicable when buildings undergo a major refurbishment or change of use, similar to rules in other countries. We believe this approach should be applied, including for evacuation lifts.

Recommendation: Government should adopt a requirement that all lifts that are due to be replaced or installed in new or existing tall buildings should be evacuation lifts.

FRS Advice

NFCC have on many occasions asserted that Government should establish procedural guidance on a statutory footing, and that any bodies carrying out a building control function should have a duty placed on them to respond to, and demonstrate how they have addressed, any comments made by the FRS.

While building control bodies are asked to have due regard to FRS observations, there is currently no requirement on either the applicant or the building control body to satisfy the FRS comments or respond to them. On multiple occasions, we have raised the issue and the potential impact and unintended consequences of FRS advice being ignored, providing case studies and examples of occasions when FRS comments have been disregarded during building regulations consultations.

Because FRS comments do not have to be addressed, outcomes have included issues in occupation such as:

- The issuing of Prohibition notices
- The need for waking watches
- FRSs needing to increase pre-determined levels of attendance to buildings, increasing the costs of operational response
- Increased regulatory activity, thus increasing demands on protection resources

Recommendation: Government should ensure that comments made by the FRS during building regulations consultations cannot continue to be ignored by those receiving them, by introducing a duty to respond to any comments made by the FRS and to demonstrate how they have been addressed.

Existing Buildings

NFCC have urged Government on many occasions to make it a requirement to retrofit sprinklers in all high-rise residential buildings over 18 metres or has at least 7 storeys that are served by a single

staircase. Sprinklers and other suppression systems can buy crucial additional time in firefighting operations, and may mean that evacuations are not necessary in the first place.

Recommendation: Government should make it a requirement to retrofit sprinklers in all high-rise residential buildings over 18 metres or has at least 7 storeys that are served by a single staircase.