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07 March 2024

## **Future Homes and Building Standards: 2023 consultation**

The National Fire Chiefs Council (NFCC) is pleased to respond to this consultation, published on 13 December 2023, regarding the Future Homes and Building Standards. NFCC is the professional voice of UK fire and rescue services (FRSs) and is comprised of a council of UK Chief Fire Officers. This response was created by NFCC's Protection Reform Unit and Strategy and Policy team and was drafted in consultation with our members across UK FRSs. Our response reflects their expertise and competence with the subject matter.

NFCC supports the move towards increasing the energy efficiency of new homes and reducing the environmental impact when they are built. However, the drive for sustainable and higher-quality buildings must be balanced with the need to ensure that new and existing building stock achieves a high degree of fire safety. In our view, there should not be a conflict between sustainability, improved building standards, and fire safety.

### **General comments**

The introduction to this consultation notes that the 2021 uplift to Part L of the Building Regulations "represents an important step towards a cleaner, greener and safer built environment." What is the evidence that this uplift is making buildings safer, and in what context? Furthermore, existing buildings should be brought up to the same standard as new builds, thus avoiding a two-tier system of safety.

The proposals state that the 2025 Future Homes and Building Standards will deliver "warm, safe and decent homes" through new ventilation and energy efficiency standards. NFCC

supports these ambitions but requires assurances that, in pursuing them, fire safety measures and the risk of spread of fire and toxic smoke have not and will not be compromised or inadvertently increase, resulting in another large-scale disaster.

### **Real-world performance of homes**

Measures should be implemented to ensure that Home User Guides or similar guidance are made available to tenants of rented accommodation as well as homeowners. This guidance should include information on:

- The importance and maintenance of any fire safety measures included in their home. This could include smoke alarms, escape windows, and fire doors.
- How people can keep themselves safe in their homes, such as prevention measures or other sources of information. For example, this could be linked to the annual Fire Kills campaign.

Additionally, any Home User Guides or similar guidance should be aligned where applicable to the Decent Homes Standard, the Housing Health and Safety Rating System, Tenant Satisfaction Measures, Approved Document B (ADB) Volumes 1 and 2, Building Safety Act Gateway processes, Safety Case reports and Golden Thread information.

### **Overheating**

NFCC notes that the call for evidence displays a missed opportunity to deal with the concerns of underheated or overly cold homes or buildings wherein occupants resort to unsafe methods to keep warm, especially during ever-increasing severe weather conditions such as extreme prolonged winters or floods.

### **Notional building approach**

Improvements to the notional building approach should include impacts once a dwelling is occupied and has a degree of fire loading (furniture, personal contents, lifestyle, etc) as well as occupant-specific vulnerabilities.

Additionally, the calculation of performance requirements includes the target fabric energy efficiency rate, but only for new homes. NFCC sees no reason why this cannot also be applied to major alterations or refurbishments of existing buildings.

### **Interaction between Approved Documents**

The review of Approved Document F and Approved Document L (ADL) should not be carried out in isolation. The proposed changes should be linked to the ongoing review of ADB to ensure that the proposals outlined in the current consultation do not affect the fire safety of new homes and existing building stock. One example is that insulation materials should not facilitate the spread of fire across the external walls and roof of a building.

## **Integrating the conservation of fuel and power and fire safety**

Although the functional requirements of Part L and most of the content of ADL do not have direct interaction with the fire performance of buildings, there are some areas where fire safety requirements should be more closely integrated, specifically solar hot water heating and the associated controls as well as generation, distribution, and storage infrastructure. At present, there is minimal reference within ADB and other regulatory guidance concerning the fire safety of solar photovoltaic (PV) panel installations. ADB only refers to solar PV panel installations in so far as they may constitute a 'specified attachment' to an external wall (i.e. in terms of Regulation 7(2) and requirement B4).

NFCC notes the guidance included within ADL on the commissioning of fixed building services and on-site electricity generation systems. It is limited to a single point (8.15) and points the reader toward a third-party document. NFCC has no comment to make on the suitability of this but trusts that operating measures have been taken to ensure this guidance is suitable for supporting compliance with commissioning rules in the Building Regulations.

Building Regulations guidance should provide specific advice with regard to the fire safety of solar PV installations as they can present a serious hazard to firefighters when undertaking firefighting operations. We would refer to [this CROSS report](#) for further information about these risks. Guidance should cover:

- The provision of information about solar PV panel installations, for the use of firefighters, as part of premises information. This should include information to assist firefighters in locating solar PV cells/arrays, isolation controls, inverters, etc.
- The provision of any Battery Energy Storage Systems (BESS) designed to store the energy generated through the solar PVs.
- The provision and siting of electrical isolation controls, which should be readily accessible to firefighters in an emergency.
- The increased potential for fire spread at roof level where PV installations are present.

While the inclusion of guidance for the fire safety of solar PV installations would be more appropriate for ADB (when it is revised), ADL should make users aware that these installations present a serious hazard to firefighters and that they should consult the relevant FRS for further guidance.

## **Building-Integrated Photovoltaic (BIPV) panels**

As well as standard solar PV panels, NFCC notes potential issues with BIPV panels. Whilst we understand that this may help people decrease their power bills from the grid to cope

with the cost of living and meet net-zero targets, we are concerned that new technology has been introduced into the built environment by law, perhaps with good intention, but at risk of creating unintended consequences with no guidance to support how it can be integrated safely or mitigate the potential impact (in the event of fire).

BIPV is not a common building scenario which means the Approved Documents are not applicable and nor are Building Standards 9999/9991. The addition of solar PV panels is not considered either. An increase in solar PV panels may also lead to an exponential increase in associated BESS across the built environment and the issues that they bring, not only the risks from BESS themselves but the risks from second-hand installations, DIY installs, and a corresponding lack of competence, amongst other risks.

### **Timetable for implementation**

These targets (new standards from 2025) seem extremely ambitious given that the construction sector is already struggling with the additional requirements introduced via the Building Safety Act, Fire Risk Appraisals of External Walls, and second staircase requirements introduced for buildings above 18m, etc.

Given the breadth of the call for evidence, NFCC is not best placed to answer all the questions and has instead selected the most appropriate to respond to below, although we note that any proposals should be mindful of the impact on fire safety; to improve one element of the built environment should not inadvertently compromise any progress made on others. It is essential to implement measures that guarantee the preservation of compartmentation and other fire safety provisions during the installation of new heating systems, or the upgrade of existing ones.

NFCC's goal is to promote a contemporary approach to tackling climate change, but it must be done through a reliable process that guarantees the safety of individuals, communities, and firefighters. The drive for quick, sustainable, and higher-quality buildings must be balanced with the need to ensure that new and existing building stock achieves a high degree of fire safety. This not only feeds directly into the planning and design process but allows a greater understanding of how the building will perform in a fire, which in turn enables FRSs to develop their operational response.

NFCC hopes this response is helpful and welcomes further discussion following the outcome of the consultation. Regards,



**Gavin Tomlinson**

Protection & Business Safety Scrutiny Committee Chair, NFCC

**Question 1. Are you responding as / on behalf of (select all that apply):**

- National representative or trade body

The National Fire Chiefs Council (NFCC) delivers the unified professional voice of the UK FRSs. Through the respective Chief Fire Officers of all UK FRSs, NFCC manages work through its national Coordination Committees and their workstreams.

**Question 4. If you are responding on behalf of a business/organisation, what is the name of your business/organisation?**

The National Fire Chiefs Council.

**Question 5. If you are responding on behalf of a business/organisation, where is your business/organisation based/registered?**

England, although NFCC also represents the devolved administrations.

**Question 6. When you respond it would be useful if you can confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:**

- **your name,**
- **your position (if applicable),**
- **the name of organisation (if applicable),**
- **an address (including post-code),**
- **an email address, and**
- **a contact telephone number**

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**Question 7. Which option for the dwelling notional buildings (for dwellings not connected to heat networks) set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?**

- a. Option 1 (higher carbon and bill savings, higher capital cost)**
- b. Option 2 (lower carbon savings, increase in bill costs, lower capital cost)**

NFCC is not best placed to answer this question, although there are some considerations that we think have been overlooked, as detailed in our answer to Question 8.

**Question 8. What are your priorities for the new specification? (select all that apply)**

- low capital cost**
- lower bills**
- carbon savings**
- other (please provide further information)**

**Please provide any additional comments to support your view on the notional building for dwellings not connected to heat networks.**

Although NFCC has no viewpoints on what the energy-related priorities for the building specification should be, we do hold serious concerns regarding how the proposed notional building specifications will be met.

Option 1 of the specification includes a requirement to provide solar PV panels for 40% of the ground floor area. It is also apparent from reading the consultation that the expectation is that many of these systems will also include BESS to allow homeowners to use more of the energy their buildings generate.

Requiring all new dwellings not connected to a heat network to have such installations represents a significant change in how the built environment is likely to look in the future and yet the associated guidance to support this is severely limited.

The draft version of ADL does not provide any significant guidance on how the wider systems should be designed. Section 6 emphasises the need to follow the manufacturer's instructions, but this is only to ensure the system works. There is no guidance on where or how these systems should be installed or the need for any additional precautionary measures.

It is noted and welcomed that Section 0.20 of ADL highlights the interaction between Part L, Part B (fire safety), and Part P (electrical safety) of the Building Regulations and points the reader to Approved Documents B and P respectively. However, neither of these documents provides any guidance to support the safe design of these systems. ADB only

refers to solar PV systems in so far as they may constitute a 'specified attachment' to an external wall (i.e. in terms of Regulation 7(2) and requirement B4).

Solar PV systems and BESS can pose significant risks to both building occupants and responding firefighters. Whilst NFCC supports the drive towards greater energy efficiency, we are concerned that the Government is making efforts to make it easier to implement these types of technologies into the built environment without due consideration of the potentially disastrous unintended consequences to building and fire safety. The complete lack of guidance to support this drive only serves to raise those concerns further.

If solar PV systems are to become a requirement for new buildings, rather than an optional extra, then it is foreseeable that designers will look at ways of better integrating them into the wider design as a means of reducing cost and improving aesthetics. NFCC is aware of some buildings now being designed with the use of BIPVs rather than Building Attached Photovoltaics (BAPV). The main distinction is that BAPVs are fitted on existing surfaces that comprise the structure (like flat or tiled roofs), whereas BIPVs essentially replace construction elements and the panel becomes part of the building (potentially a façade or roof element) bringing with them additional considerations and concerns about both structural safety and fire safety – see [this CROSS report](#).

Increased demand for solar PV systems is likely to lead to the same difficulties we have seen with the introduction of Part S of Building Regulations – infrastructure for charging electric vehicles. Approved Document S (ADS) highlights the overlap with fire safety and points the reader towards ADB even though there is no reference to these matters contained within.

Although this consultation is focused on Part L, the Government must recognise the wider implications of introducing changes to certain aspects of Building Regulations. The proposed changes to Part L bring with them a clear need to also update ADB.

### **Question 10. Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?**

- a. Option 1**
- b. Option 2**

NFCC is not best placed to answer this question, although there are some considerations that we think have been overlooked, as detailed in our answer to Question 11.

## Question 11. What are your priorities for the new specification?

- low capital cost
- lower bills
- carbon savings
- other (please provide further information)

**Please provide additional information to support your view on the proposed non-domestic notional buildings set out in the National Calculation Methodology modelling guide.**

Although NFCC has no viewpoints on what the energy-related priorities for the building specification should be, we do hold serious concerns regarding how the proposed notional building specifications will be met.

Both options presented introduce significant requirements for solar PV systems. It is also apparent from reading the consultation that the expectation is that many of these systems will also include BESS to allow occupants to use more of the energy their buildings generate.

Requiring all new non-domestic buildings to have solar PV systems represents a significant change in how the built environment is likely to look in the future and yet the associated guidance to support this is severely limited.

The draft version of ADL does not provide any significant guidance on how the wider systems should be designed. Section 6 emphasises the need to follow the manufacturer's instructions, but this is only to ensure the system works. There is no guidance on where or how these systems should be installed or the need for any additional precautionary measures.

It is noted and welcomed that Section 0.20 of ADL highlights the interaction between Part L, Part B (fire safety), and Part P (electrical safety) of the Building Regulations and points the reader to Approved Documents B and P respectively. However, neither of these documents provides any guidance to support the safe design of these systems. ADB only refers to solar PV systems in so far as they may constitute a 'specified attachment' to an external wall (i.e. in terms of Regulation 7(2) and requirement B4).

NFCC already holds concerns about both solar PV systems and BESS. They can pose significant risks to both building occupants and responding firefighters. Whilst NFCC supports the drive towards greater energy efficiency, we are concerned that the Government is making efforts to make it easier to implement these types of technologies into the built environment without due consideration of the potentially disastrous unintended consequences to building and fire safety. The complete lack of guidance to support this drive only serves to raise those concerns further.



If solar PV systems are to become a requirement for new buildings, rather than an optional extra, then it is foreseeable that designers will look at ways of better integrating them into the wider design as a means of reducing cost and improving aesthetics. NFCC is aware of some buildings now being designed with the use of BIPVs rather than Building Attached Photovoltaics (BAPV). The main distinction is that BAPVs are fitted on existing surfaces that comprise the structure (like flat or tiled roofs), whereas BIPVs essentially replace construction elements and the panel becomes part of the building (potentially a façade or roof element) bringing with them additional considerations and concerns about both structural safety and fire safety – see [this CROSS report](#).

Increased demand for solar PV systems is likely to lead to the same difficulties we have seen with the introduction of Part S of Building Regulations – infrastructure for charging electric vehicles. ADS highlights the overlap with fire safety and points the reader towards ADB even though there is no reference to these matters contained within.

Although this consultation is focused on Part L, the government must recognize the wider implications of introducing changes to certain aspects of Building Regulations and the proposed changes to Part L bring with them a clear need to also update ADB.

**Question 15. Do you agree that operating and maintenance information should be fixed to heat pump units in new homes?**

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

Yes. This is a logical proposal and ensures that the information will be readily available.

**Question 16. Do you think that the operating and maintenance information set out in Section 10 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure that heat pumps are operated and maintained correctly?**

- a. Yes
- b. Yes, and I want to provide additional suggestions or information to support my view
- c. No (please provide justification)

b. Yes, and I want to provide additional suggestions or information to support my view.

In addition to the information outlined in ADL, any operating and maintenance information should highlight any risks (be it fire or otherwise) associated with improper use or maintenance of such systems.

**Question 22. Do you agree that lifts, escalators and moving walkways in new buildings (but not when installed within a dwelling) should be included in the definition of fixed building services?**

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

b. Yes, and I want to provide additional suggestions or information to support my view.

Whilst NFCC supports the widening of the scope of what constitutes fixed building services to achieve greater energy efficiency in buildings, it is unclear whether the term 'lifts' is intended to cover firefighting lifts.

In ADB, firefighting lifts are a requirement in certain large buildings. They assist FRSs with both firefighting and rescue operations. Neither the consultation nor the impact assessment highlights the possible implications of requiring them to be more energy efficient, nor the effect this will have on their design or performance.

Furthermore, NFCC also continues to push for greater inclusion of evacuation lifts in high-rise buildings to support the evacuation of residents in the event of a fire. The standard for evacuation lifts is still in development (*BS EN 81-76: Evacuation of persons with disabilities using lifts*). As above, it is unclear whether evacuation lifts would fall under this definition either now or in the future.

Where new requirements are likely to have a detrimental effect on the performance of provisions ultimately intended to protect life, NFCC requests that further engagement with the fire sector be undertaken.

**Question 23. Do you agree with the proposed guidance for passenger lifts, escalators and moving walkways in draft Approved Document L, Volume 2: Buildings other than dwellings?**

- a. Yes**
- b. Yes, and I want to provide additional suggestions or information to support my view**
- c. No (please provide justification)**

Whilst NFCC neither agrees nor disagrees with the proposed guidance on passenger lifts, we reiterate that it remains unclear what types of lifts are covered.

ADL Volume 2 does include a definition of passenger lift (unlike Volume 1) which states that it excludes “*firefighting lifts installed for the exclusive use of the firefighting services and which are not intended for use by occupants of the building.*”

NFCC is unsure exactly what is being referred to here as we are unfamiliar with the concept of a lift provided exclusively for firefighting. Firefighting lifts are a requirement in all buildings over 18m, however, it is expected that they will be used for general circulation by building occupants too.

Notwithstanding the imprecise definition, the inclusion of such an exemption suggests that there may be implications associated with making lifts more energy efficient which could compromise the ability of FRSs to use the lifts effectively. If this is the case, then the definition should be revised to exempt any lift intended to be used by firefighters (i.e. a firefighting lift).

NFCC continues to push for greater inclusion of evacuation lifts in high-rise buildings to support the evacuation of residents in the event of a fire. The standard for evacuation lifts is still in development (*BS EN 81-76: Evacuation of persons with disabilities using lifts*). As above, it is unclear whether evacuation lifts would fall under this definition either now or in the future. As these are a life safety measure, NFCC would not expect to see their performance compromised by the drive towards increased energy efficiency of buildings and where it is appropriate to exclude firefighting lifts, it would also likely be appropriate to exclude evacuation lifts.

**Question 46. Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?**

- a. Yes
- b. Yes, and I'd like to provide further information
- c. No (please provide justification)

c. No.

An increase in solar PV panels may also lead to an exponential increase in associated BESS across the built environment and all the issues that brings. These are not only the risks from the BESS themselves, but also the risks from secondhand installations, DIY installs, and a corresponding lack of competence, amongst others. While NFCC understands that this may help people decrease their power bills from the grid as a way to

cope with the cost of living and meet net-zero targets, we are concerned that the Government is making efforts to encourage the implementation of these types of technologies into the built environment without due consideration of the potentially disastrous unintended consequences to building and fire safety.

Our members have also noted a trend of incorporating solar PV panels on the outside walls of buildings rather than the traditional roof location, even running the full height of the building. The potential for fire spread via these vertically located panels should be considered, especially in densely populated areas where fire safety is a critical concern due to the proximity of buildings. Proper design, installation, and maintenance of solar PV panels are crucial to maintaining fire safety standards and protecting occupants, firefighters, and neighbouring structures from potential hazards. Building plans should include the locations of any BESS, solar PV cells, or other power supplies.

NFCC believes that, given the lack of guidance and research on how to incorporate EVs (electric vehicles such as cars, bikes, scooters, and mobility scooters) into the built environment, this is an area that requires further research and consideration. These fires can take a long time to extinguish and expose operational crew and potentially building residents to fire, dangerous gases, and heat for a prolonged period.

NFCC believes that the impact of EV charging needs to be considered further, particularly regarding B1 to B5 of Schedule 1 to the Building Regulations 2010 (amended). The requirements of EV charging will likely require additional technical requirements to safely implement the policies contained within this consultation. The guidance to support those additional technical requirements (such as in ADB) needs to be in place before the mandating of extensive charging facilities.

The installation of EV charge points may have greater implications on building safety than anticipated. It may be unclear to those undertaking the work whether the building's existing fire precaution arrangements are sufficient to mitigate the introduction of the additional risk of EV charging, or whether additional measures are required to be retrospectively installed. There is a danger that in complying with this mandate, those responsible for a building may fall foul of other legislation or unwittingly make their building less safe than it was before the installation of the charge points.

The reviewed documents contain very little guidance on how the proposed EV charge points and supporting infrastructure can be safely integrated into the built environment, both for new construction and retrospectively. We can foresee numerous challenges concerning firefighting and fire safety which should be addressed in the guidance provided to support the Building Regulations.

According to Home Office statistics, fires relating to electrical equipment and supplies are the second highest cause of both accidental dwelling fires in the home and accidental dwelling fire-related injuries and deaths. In line with NFCC's ongoing work, we recommend mandated electrical inspection reports (EIRs) in homes every 5 years, thereby bringing the social rented sector into line with the requirements for the private sector. The EIR should

highlight issues, such as older potentially unsafe consumer units or wiring, or a lack of adequate circuit protection from residual current devices.

NFCC would like to see full consideration of the specific hazards associated with certain electrical home products to ensure they are not unduly dismissed as low risk, as well as considering how risk in a product may emerge - this may happen over time or through use (e.g. plastics may become brittle, insulating materials for electricals may break down). We believe this area should be kept under review, with more attention placed on consumer education, and would welcome the Government playing a central coordinating role in this space.

**Question 50. Do you have a view on how Home User Guides could be made more useful and accessible for homeowners and occupants, including on the merits of requiring developers to make guides available digitally? Please provide evidence where possible.**

**a. Yes, (please provide further details)**

**b. No**

a. Yes.

Although Part L of the Building Regulations England, and therefore this consultation, is clearly focused on energy use, the idea of a Home User Guide suggests a broader opportunity for providing people with useful and important information on their homes.

Whilst NFCC has no comments to make about the Home User Guide in terms of energy-related information, we do believe there is scope for any Home User Guide as required by Building Regulations to provide fire safety-related information.

In blocks of flats (and commercial buildings), there are requirements for passing on fire safety information (i.e. Regulation 38) to the Responsible Person. There are also legal duties under the Regulatory Reform (Fire Safety) Order and Fire Safety (England) Regulations to provide fire safety information to residents. However, none of this information covers keeping people safe from fire in their flats. Furthermore, most traditional houses will also fall completely outside the scope of fire safety legislation.

We suggest that the scope of a Home User Guide could be expanded to provide fire safety information to homeowners and occupants, which could include:

- The provision of information on the importance and maintenance of any fire safety measures included in their home. This could include smoke alarms, escape windows, and fire doors.

- How people can keep themselves safe in their homes, such as prevention measures or other sources of information. For example, this could be linked to the annual FireKills campaign.

Homeowners should be able to decide whether the information is provided physically or digitally. However, measures should be implemented to ensure that Home User Guides or similar guidance are made available to tenants of rented accommodation or social housing as well as homeowners.

**Question 51. Do you think that there are issues with compliance with Regulations 39, 40, 40A and 40B of the Building Regulations 2010? Please provide evidence with your answer.**

**a. Yes (please provide justification)**

**b. No (please provide justification)**

NFCC is not best placed to answer this question, but we note that although the functional requirements of Part L and most of the content of ADL do not have direct interaction with the fire performance of buildings, there are some areas where fire safety requirements should be more closely integrated, specifically solar hot water heating and the associated controls as well as generation, distribution, and storage infrastructure. At present, there are minimal references within ADB and other regulatory guidance concerning the fire safety of solar PV panel installations.

While the inclusion of guidance for the fire safety of solar PV installations would be more appropriate for ADB (when it is revised), ADL should make users aware that these panels present a serious hazard to firefighters and that they should consult the relevant FRS for further guidance.

**Question 52. Do you think that local authorities should be required to ensure that information required under Regulations 39, 40, 40A and 40B of the Building Regulations 2010 has been given to the homeowner before issuing a completion certificate?**

**a. Yes**

**b. Yes, and I'd like to provide further information**

**c. No (please provide justification)**

a. Yes.

NFCC has reservations about the push towards systems for on-site electricity generation and storage, such as solar PV panels linked to BESS. This is particularly the case with Regulation 40A, as we believe this information is important to homeowners not only to support them in effectively managing energy consumption, but potentially for their safety also.

Unlike other potential fire risks in a new building that are well recognised, such as cooking appliances, homeowners are unlikely to have much knowledge of solar PV systems. Accordingly, we support the requirement to ensure the relevant information has been given to the homeowner before issuing a completion certificate.

**Question 92. Are there any improvements that you recommend making to the information provided about overheating in the Home User Guide template?**

**a. Yes, (please provide justification)**

**b. No**

a. Yes.

As outlined in our response to Question 50, we are unaware of any mechanisms in place to ensure homeowners are provided with fire safety information on their homes, given in most cases the home will fall outside the scope of the Regulatory Reform (Fire Safety) Order and therefore the application of Regulation 38.

In the guidance to homeowners regarding keeping cool, the Home User Guide templates state: *“If possible, open internal doors (except fire doors), including overnight and when your home is empty. This will allow ventilation air to flow freely through your home.”*

Without fire safety information, NFCC suggests that homeowners may not always be aware that fire doors form part of the design of their homes. In most homes, a single type of door will likely be used throughout the building.

Regardless, it has long been the advice of FRSs that people should close all internal doors (i.e. not just fire doors) at night to reduce the risk of fire and protect the means of escape. Accordingly, NFCC would strongly disagree with the inclusion of this advice as a means of managing the issues of overheating.

Although it is recognised that the Home User Guide is intended to focus on managing energy use, we believe there is scope for information on fire safety (e.g. fire prevention, smoke alarms, and fire doors) to be included in this or something similar.