

The Rt Hon Michael Gove MP  
Secretary of State  
Department for Levelling Up, Housing and Communities  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

22 March 2023

Dear Secretary of State,

As organisations with a significant interest in ensuring the highest standards of building safety, we are writing to you to share our concerns about the proposed maximum threshold for the provision of a single staircase in new residential buildings.

The proposed threshold of 30 metres falls short of what we believe to be best practice. We recommend that new residential buildings of 18 metres and above are designed with two staircases. An 18 metre height threshold would better align height thresholds across the wider regulatory environment and better reflect the reality of a post-Grenfell world.

#### **Aligning height thresholds across the wider regulatory environment**

While arguments exist for a range of thresholds, both higher and lower, an 18 metre threshold would bring the greatest harmonisation with the wider regulatory environment, and therefore the greatest simplicity and certainty for industry at this time.

An 18 metre threshold would align with definitions in the Building Safety Act, as well as thresholds for certain provisions in the Fire Safety (England) Regulations, and the amendments to fire safety provisions within Approved Document B in relation to fire alert systems in blocks of flats with storeys over 18 metres.

This would also help to synchronise standards across the United Kingdom by aligning to rules in Scotland, which has required two staircases in new residential buildings over 18 metres for four years.

#### **Adapting policy to reflect changing behaviour**

Research has found that post-Grenfell more people are choosing to evacuate their building during a fire rather than following 'stay put' advice. Between 1 April 2019 and 31 March 2022, there were 154 cases where 10 or more people evacuated from a block of flats of a minimum of six storeys in London. This amounted to nearly 8,500 people choosing to evacuate buildings rather than 'staying put' before the arrival of the London Fire Brigade or during an incident.<sup>1</sup>

This demonstrates the importance of occupants having access to a safe, smoke-free evacuation route in buildings over 18 metres, helping to remove the risk of a single point of failure.

**Further action is needed**

While 18 metres is the correct height for a second staircase for new residential buildings, it is not a panacea for fire safety. We urge the Government to undertake a full review of Approved Document B. We must ensure that regulations and guidance are consistent, clear, unambiguous and actually deliver safe buildings.

Our existing stock should also be brought up to a safer level during scheduled refurbishment or maintenance. Consideration should be given to evacuation lifts, sprinklers, fire alarm systems or other fire safety measures as available retrospectively.

The fire at Grenfell Tower on 14 June 2017 that claimed 72 lives, demonstrated the inadequacy of our entire regulatory system. More than five years have now passed – it is time to take bolder action and for the Government to make future homes the safest they can be, preventing further avoidable tragedies.

Yours sincerely,

Eddie Tuttle, Director of Policy, External Affairs and Research, Chartered Institute of Building (CIOB)

Gavin Tomlinson, Protection & Business Safety Scrutiny Chair, National Fire Chiefs Council (NFCC)

Simon Allford, President, Royal Institute of British Architects (RIBA)

Gary Strong, Global Buildings Standards Director and Fire Safety Lead, Royal Institution of Chartered Surveyors (RICS)

Kamran Mallick, Chief Executive Officer, Disability Rights UK

Jeremy Porteus, Chief Executive Officer, Housing LIN

Tracey Lazard, Chief Executive Officer, Inclusion London

Georgie Hulme, Co-Founder, Claddag - Leaseholder Disability Action Group

---

<sup>i</sup> [https://www.nationalfirechiefs.org.uk/write/MediaUploads/Position%20statements/Protection/NFCC\\_Position\\_Statement\\_Single\\_Staircases\\_Final.pdf](https://www.nationalfirechiefs.org.uk/write/MediaUploads/Position%20statements/Protection/NFCC_Position_Statement_Single_Staircases_Final.pdf)