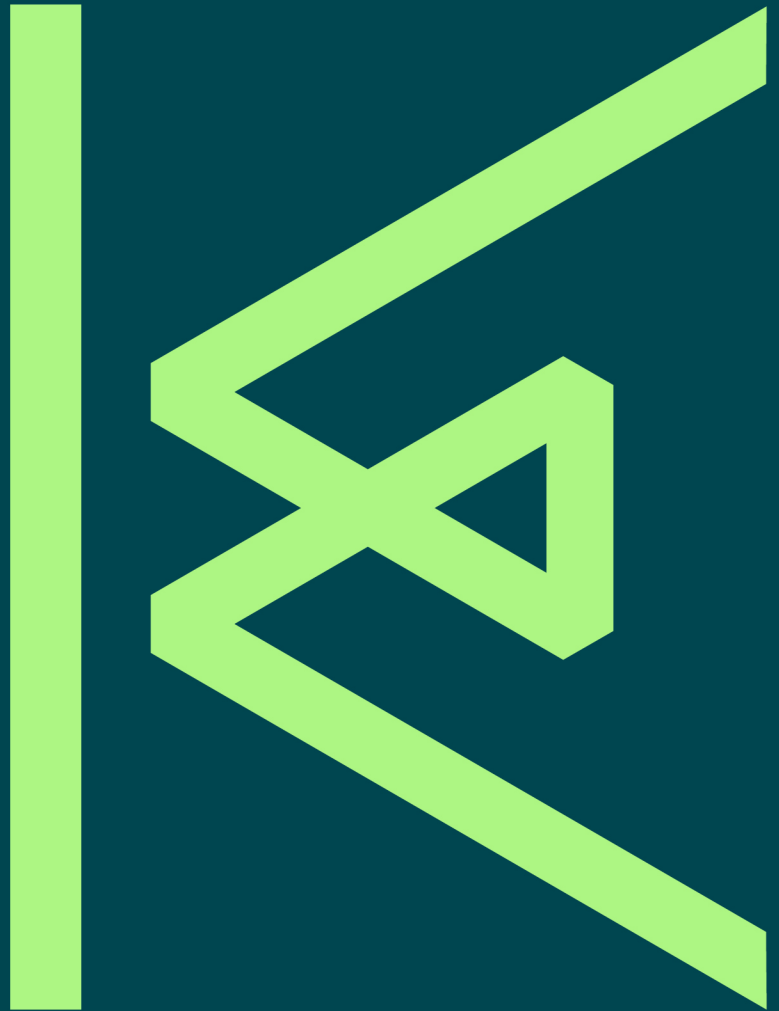




Fire & Building Safety Readiness Guide for Acquisitions

October 2025

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1 Introduction

This guide has been prepared to help clients understand the fire and building safety obligations associated with acquiring existing residential buildings of varying heights in England. It outlines what is legally required, what is best practice, and how the level of scrutiny and documentation changes depending on the building's height and complexity particularly for buildings above 11 metres and High-Rise Residential Buildings (HRBs) subject to the Building Safety Act 2022.

The document brings together key elements such as fire risk assessments, EWS1 forms, PAS9980, fire door and compartmentation inspections, and the building safety case framework. It is designed to support due diligence during acquisition, enable consistent portfolio-wide compliance reviews, and identify documentation gaps or latent risks. It is not a substitute for professional fire engineering advice but provides a structured overview to help assess readiness, regulatory exposure, and priority actions across multiple residential assets.

Building Height	EWS1 Required?	Fire Risk Assessment Type	Fire Door Inspections*	Compartmentation Survey	Safety Case Report (HRBs)
<11m	Rare	Type 1–3	Best practice	If issues suspected	Not required
11–18m	Often	Type 3	Annually (≥11m)	Strongly recommended	Not required
>18m (HRB)	Yes	Type 3–4	Required	Required	Required

2 Building Height and EWS

Step 1: Determine Building Height

- <11m: Lower risk category
- 11–18m: Mid-risk; more scrutiny on fire safety
- >18m (HRBs): Highest scrutiny; subject to Building Safety Act requirements

Step 2: Is an EWS1 Form Required?

- <11m: Not typically required
- 11–18m: Often requested by lenders/insurers
- >18m: Commonly required and expected

Step 3: Assess EWS1 Rating

Rating	Meaning	Next Step
A1	No combustible materials	No action required
A2	Limited combustibles, low risk	No action required
A3	Combustibles present, unclear risk	Recommend FRAEW
B1	Combustibles; remedial works likely	FRAEW to define scope
B2	High risk; urgent remediation needed	FRAEW + action plan

Step 4: Commission a FRAEW (if needed)

- Uses PAS 9980 methodology
- Identifies specific remediation and/or interim measures

Step 5: Update FRA with FRAEW Findings

- FRA should remain live and reflect real-time building risk

3 Fire Safety and Documentation Requirements by Height

Requirement / Document	<11m	11–18m	>18m (HRB)	Notes
Fire Risk Assessment (Type 3 preferred)	✓	✓	✓	Should be live and updated regularly. FRA Type 4 for high-risk or post-works situations.
Smoke/Heat Detection Documentation	✓	✓	✓	Test and maintenance records should be retained.
Emergency Lighting and Signage	✓	✓	✓	Functionality must be regularly tested and recorded.
Fire Doors: Flat Entrances	🔧	✓	✓	Recommended for <11m; Annual inspections required ≥11m. Must be done by a competent person.
Fire Doors: Common Areas	🔧	✓	✓	🔧 Recommended for <11m; ✓ Quarterly checks ≥11m. Part of legal compliance.
Compartmentation Survey	🔧	✓	✓	🔧 Recommended <11m; ✓ Required in practice for 11m+ to support FRA and risk management.
Fire Strategy Document	🔧	✓	✓	🔧 Optional <11m; key to managing evacuation and fire control in taller buildings.
EWS1 Form (External Wall Fire Review)	✗	✓*	✓	Based on lender/insurer requirement; mandatory in practice for HRBs.
FRAEW (PAS 9980-based appraisal)	✗	✓*	✓	Triggered by EWS1 results or suspected external wall risks.
Sprinkler System Documentation	✗	🔧	✓*	✓ Required in new builds >18m; 🔧 recommended for existing buildings depending on risk.
Evacuation / Stay-Put Strategy Documentation	🔧	✓	✓	Clear strategy should align with fire strategy and resident communication.

Requirement / Document	<11m	11–18m	>18m (HRB)	Notes
Golden Thread / Safety Case (BSA 2022)	✗	✗	✓	Legal requirement for occupied HRBs (≥18m or 7+ storeys). Includes risk ownership and digital record keeping.

- ✓ = Legally required
- 📄 = Recommended / Best practice
- ✗ = Not required
- ✓* = Required based on specific risk context (e.g. cladding presence, lender requirement)

4 Fire Risk Assessments

The FRA is a live, legally required document for all residential buildings, and it's central to ongoing fire safety management and must be conducted by a competent person

FRA Type	Scope	Intrusive?	Suitable For
Type 1	Common parts only (non-intrusive visual inspection)	No	Basic compliance for low-risk buildings
Type 2	Common parts only (with intrusive checks)	Yes	Investigating suspected issues in structure or fire-stopping
Type 3	Common parts and sample flats (non-intrusive inside flats)	No	Standard for most multi-residential blocks
Type 4	Common parts and flats (with intrusive checks in both)	Yes	High-risk buildings or post-incident/major works

Type 1: Basic legal minimum for simple, low-rise blocks.

Type 2: Use when a Type 1 raises red flags that need deeper investigation without going into residents' flats.

Type 3: Recommended for all residential blocks with multiple dwellings.

Type 4: Strongly advised for high-rise, HRBs, or buildings with fire safety concerns or suspected compartmentation issues.

5 Fire Doors

Aspect	11–18m Buildings	>18m Buildings (HRBs)
Flat Entrance Door Inspections	Annual inspections required	Annual inspections required
Common Door Inspections	Quarterly (legal minimum)	Quarterly (legal minimum)

Aspect	11–18m Buildings	>18m Buildings (HRBs)
Accountability	Must be done by responsible person	Must be done by Accountable Person (under BSA)
Documentation & Audit	Maintain inspection records	Records are auditable by the Building Safety Regulator
Integration into Safety Case	Not required	Mandatory – Part of Building Safety Case
Regulator Oversight	None beyond Fire Service	Direct oversight by Building Safety Regulator (BSR)

Inspections must be carried out by a competent person (ideally FIRAS/BM TRADA/IFC certified)

6 Compartmentation

Surveys are not named in law but are required in practice to prove compliance with the Fire Safety Order and form part of a robust FRA or Safety Case. Recommended for all buildings >11m and mandatory in practice for HRBs. Should be completed by someone with demonstrable competence in passive fire protection (FIRAS/ASFP/fire engineer)

7 High-Rise Residential Buildings (HRBs) – Safety Case Requirements

The Building Safety Case brings fire and structural safety documentation together to demonstrate how the building's risks are being identified, managed, and kept as low as reasonably practicable (ALARP), below is a list of required information to support the safety case, but the Building safety regulator are asking a lot of questions/requests for information so having the below isn't a home run for getting a certificate.

Document / Evidence	Purpose	Required?
Building Safety Case Report	Demonstrates ALARP risk management	Required
Fire Risk Assessment (Type 3 or 4)	Live risk documentation	Required
Structural Risk Assessment	Identifies structural safety concerns	Required
Golden Thread Information	Digital records of safety-critical information	Required
Building Layouts & Floor Plans	For evacuation and emergency access	Required
External Wall Documentation (incl. FRAEW, EWS1)	Validates cladding and spread of fire risk	Required
Fire Strategy Document	Evacuation and suppression strategy	Required
Fire Door Maintenance Records	Proof of compliance with legal inspections	Required

Document / Evidence	Purpose	Required?
Fire Systems Testing & Maintenance Records	Alarms, AOVs, emergency lighting, etc.	Required
Resident Engagement Strategy	Demonstrates how residents are informed	Required
Emergency Evacuation Plan	Includes PEEPs where applicable	Required
Risk Register	Central record of current known risks	Required
Roles & Responsibilities (incl. Accountable Person)	Governance and compliance structure	Required
CDM Health & Safety File	Legacy design and construction risk documentation	Required
Change Control / Alterations Logs	Record of fire/structural-impacting works	Required
Historical Fire/Incident Reports	Supports understanding of risk profile	Recommended
O&M Manuals	Supports long-term safety management	Recommended
Building Control / Completion Certificates	Shows sign-off compliance	Recommended
Third-Party Safety Audit Reports	Independent assurance	Recommended

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Thank you



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