Impact Assessment

Title:	Residential Personal Emergency Evacuation Plans (REEPS) and Building Level Evacuation Plans
Type of measure:	Secondary legislation
Department or agency:	Ministry of Housing, Communities and Local Government
IA number:	N/A
Type of Impact Assessment	Final
RPC reference number:	N/A
Contact for enquiries:	FireSafetyPolicy@communities.gov.uk
Date:	4th July 2025

1. Summary of proposal

1. The recommendations made in the Grenfell Tower Inquiry Phase One (GTI P1) Report,[1] which followed the Grenfell Tower fire, indicate that there is more to do to ensure the safety of all residents in high-rise residential buildings. This especially applies to those who have an impaired ability to self-evacuate.

2. The Residential Personal Emergency Evacuation Plans (RPEEPs) policy and regulations addressed in this Impact Assessment (IA) is the government's response to the Inquiry's recommendations. The RPEEPs related regulations aim to support the fire safety and evacuation of these vulnerable residents. These are residents who may be considered vulnerable due to a physical or cognitive condition which compromises their ability to evacuate a building.

2. Strategic case for proposed regulation

3. In the year ending December 2024, Fire and Rescue Services (FRS) attended 25,076 dwelling fires[2] of which 697 occurred in purpose-built high-rise flats (10+ storeys). There were two fire-related fatalities and 131 non-fatal casualties in purpose-built high-rise flats in the year ending December 2024.[3]

4. The government plans to address all recommendations of the first report of the Grenfell Tower Inquiry. To address these recommendations as set out in the GTI P1 report, legislative changes which can be achieved by new regulations via Article 24 of the Regulatory Reform (Fire Safety) Order 2005 (FSO 2005)[4] are required. The new regulations will also ensure that those required to comply with their requirements, or enforce them under FSO 2005 provisions, are clear about their roles and responsibilities, and that those residents falling into scope of the regulations feel safe, and are safe, in their homes.

5. If the government fails to intervene, the recommendations set out in the GTI P1 report will not be addressed. Evacuation measures will not be put in place which could result in delayed evacuations and a failure to decrease the risk of injuries and deaths of vulnerable people in high-rise residential buildings.

6. These proposals would create new duties with respect to all high-rise residential buildings (7 storeys/above 18 metres) and medium-rise residential buildings (between 11 and 18 metres) with a simultaneous evacuation (SE) strategy[5] in place (higher risk building). The coverage will be England.

3. SMART objectives for intervention

7. The policy objective is to reduce the societal harm caused by fires in high-rise residential buildings and higher risk residential buildings. The Residential PEEPs

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1 Grenfell Tower Inquiry Phase 1 report: https://www.grenfelltowerinquiry.org.uk/phase-1-report

2 FIRE0102, Fire statistics data tables - GOV.UK: https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

3 FIRE0205, Fire statistics data tables - GOV.UK: https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

4 Regulatory Reform (Fire Safety) Order 2005: https://www.legislation.gov.uk/uksi/2005/1541/contents

5 The approach, where all occupants are not expected to remain in the building for a prolonged time and go immediately to a designated assembly point.

regulations[6] aim to support the fire safety and evacuation of residents who may be considered vulnerable due to a physical or cognitive condition compromising their ability to evacuate a building. The building level evacuation plans regulation aims to improve fire safety for all residents. The intended outcomes will be a reduced number of fire-related injuries and fatalities and increased level of fire safety within high-rise and higher risk residential buildings. These outcomes are expected to occur from the point of implementation onwards.

8. The policy will ensure that:

- The government addresses the Grenfell Tower Inquiry's recommendations so that lessons are learned from the tragedy and best practice is developed over time.
- Residents with disabilities or impairments which affect their ability to evacuate in-scope buildings can feel reassured that their needs are being taken into account and that appropriate steps are taken so that they feel safe in their homes.

4. Description of proposed intervention options and explanation of the logical change process whereby this achieves SMART objectives

9. These regulations (the Preferred Option - Option 1) requires Responsible Persons under the Fire Safety Order, including building owners and managers, put in place a 'Residential PEEP' (RPEEPs) process for residential buildings that contain two or more sets of domestic premises, and that either (1) are 18 metres (m) + in height or (2) have at least 7 storeys; or (3) are above 11 metres (m) in height with a Simultaneous Evacuation (SE) strategy in place in England.

10. This will include RPs taking reasonable steps to identify and engage with their vulnerable residents. RPs are to then offer a Person-Centred Fire Risk Assessment (PCFRA) to each vulnerable resident identified. The PCFRA must include:

a) Consideration of the ability of the resident to self-evacuate.

b) Consideration of the fire safety risks present in the building's common areas, including those that might hinder the resident's ability to self-evacuate.

11. The RP, taking steps a) and b) into account, will look to agree with the resident and implement reasonable and proportionate mitigations (in the RP's opinion) to mitigate the risks identified by the PCFRA – this could include the use of volunteers (for example, family members or neighbours) where the resident themselves can make the arrangement. The RP will then produce and agree with the resident a written 'RPEEPs' statement on what the resident, and anyone supporting should do in the event of a fire.

12. RPs are then to share high-level information on all residents with a disability or impairment who have a Residential PEEP and who give permission for this to be shared, with their local Fire and Rescue Authority (FRA). The information must cover the flat number, floor number and an indication of the nature / degree of the resident's

[6] The Fire Safety (Residential Evacuation Plans) (England) Regulations 2025

impairment and whether, following the PCFRA process, they have a plan in place to evacuate.

13. In the event of a fire, the FRS will fight the fire and undertake the evacuation and rescue of vulnerable residents. This will most likely be where no reasonable or proportionate measures to enable self-evacuation could be put in place by the RP, or if a vulnerable resident's evacuation plan has failed, for example, if a volunteer neighbour identified by the resident is not available to support. In such cases, the FRS benefit from the additional information surrounding the ability of vulnerable residents to evacuate that is now available to them.

14. RPs will regularly review RPEEPs (on an annual basis; where there is reason to believe they need to be amended, for example when new residents move in; or by reasonable request from a vulnerable resident if they feel their circumstances have changed).

15. RPs responsible for buildings within the scope of the RPEEPs regulations (all high-rise residential buildings and all medium-rise residential buildings between 11 and 18 metres with an SE strategy in place) will be required to prepare a separate building level evacuation plan and share this with their local FRA. This generic plan must include the instructions to residents (required under the Fire Safety (England) Regulations 2022[7]), whether there are relevant residents, and information relating to any arrangements for evacuation.

16. Overall, the steps outlined in paragraphs 9 to 15 will lead to more efficient evacuations of residents with disabilities or impairments in buildings in scope. The regulations will be made using secondary legislation under powers in the FSO 2005 with the exception of one clause (requiring consideration of the provision of in flat measures) which will be given effect via primary legislation. However, officials will include in the guidance that RPs could and should consider in flat mitigations as they are often a more proportionate response, and it is the government's intention to make this a legal requirement as soon as possible.

5. Summary of long-list and alternatives

17. **Option 0: 'Do nothing'.** Under Option 0 there would be no legislative changes and no implementation of the relevant GTI P1 recommendations. This would not meet the government's objectives or the Inquiry's recommendations as the Inquiry was specific in making recommendations "required by law".

18. Non-regulatory options were not considered in this IA as these would not meet the recommendations set out in the GTI P1 report or the strategic and policy objectives.

19. For all of the following options, **regulations require** that RPs put in place 'RPEEPs'.

20. **Option 1: 'Preferred Option'.** All high-rise (18m+ or 7 or more storeys) buildings and buildings between 11 and 18m with an SE strategy in place in England, in either case where there are two or more domestic premises. **This is the government's preferred option,** as it meets the strategic and policy objectives, and is carried forward to the shortlist.

[7] Fire Safety England Regulations 2022 – Regulation 9: https://www.legislation.gov.uk/uksi/2022/547/regulation/9/made

21. **Option 2:** All residential buildings with an SE strategy in place in England. As option 2 is only to be implemented in residential buildings with an SE strategy in place, it does not meet the requirements of improving fire safety and evacuation for residents in high-rise buildings and was discounted.

22. **Option 3:** All multi-occupied residential buildings regardless of height in England. Option 3 goes far beyond the scope of the GTI P1 and was discounted.

6. Description of shortlisted policy options carried forward

23. **Option 0: 'Do nothing'.** Under Option 0 there would be no legislative changes and no implementation of the relevant GTI P1 recommendations.

24. Under Option 0 there would be no legislative changes and no implementation of the relevant GTI P1 recommendations. This would not meet the government's objectives or the Inquiry recommendations as the Inquiry was specific in making recommendations "required by law."

25. **Option 1: 'Preferred Option'.** RPs put in place RPEEPs for all high-rise (18m + or 7 or more storeys) residential buildings and residential buildings between 11 and 18m with an SE strategy in place in England. Option 1 is outlined in greater detail in section 4 above.

7. Regulatory scorecard for preferred option

Part A: Overall and stakeholder impacts

(1) Overall impacts on total welfare		Directional rating
Description of overall expected impact	The overall impact of the implementation of RPEEPs is uncertain due to the difficulties in quantifying the direct outcomes, such as the number of lives saved, and monetising the benefits associated with improved fire safety. Breakeven analysis based on the NPSV indicates that 3 fire related fatalities would need to be avoided per year over 10 years for the preferred option's benefits to exceed the costs. Alternatively, 485 fire related casualties requiring hospital treatment would need to be avoided per year over 10 years for the preferred option's benefits to exceed the costs.	**Uncertain** **Based on all impacts (incl. non-monetised)**
Monetised impacts	The central Net Present Social Value (NPSV) estimate is -£29.9 million. The set-up costs are centrally estimated to be £203 million. The ongoing costs (PV, year 2 to year 10) are centrally estimated to be £304 million.	**Negative** **Based on likely £NPSV**

	The total costs are centrally estimated to be £508 million. Due to a large range in the potential cost of measures and low levels of certainty around take-up rates, extreme scenarios have been modelled for analytical completeness. These extremes represent the absolute best and worst-case scenarios, and it is important to note that the IA does not suggest that these scenarios are a likely outcome, however estimating a "reasonable" best and worst-case scenario is not possible at this stage due to a lack of available evidence. These scenarios are explained in greater detail in the sensitivity section. Estimating the number of fatalities and casualties this policy will prevent with certainty is challenging, due to the limited availability of well evidenced data on the direct impact of these measures. As a result, it has not been possible to accurately quantify, and therefore monetise, these benefits. Instead, break-even and scenario analysis has been conducted to understand the point at which the benefits of the policy outweigh the costs.	
Non-monetised impacts	The implementation of RPEEPs in high-rise and medium-rise SE buildings will lead to positive non-monetised impacts. The policy aims to implement additional fire safety measures which would create benefits such as a reduced fear of fire, as a result of reduced occurrence and impact. In 2020/21, Department for Levelling-Up, Housing, and Communities' (now Ministry of Housing, Communities and Local Government) English Housing Survey[8] found that 26% are fearful that a fire may break out, in high-rise residential buildings. An increase in the number of fire safety measures would be likely to reduce this fear, improving the wellbeing of residents. This has not been monetised at this stage. The increase in fire safety measures and subsequent improved ability to evacuate is also expected to reduce the number of casualties and fatalities. This is expected to lead to direct economic and social benefits.	**Positive**
Any significant or adverse distributional impacts?	In terms of households costs, this IA assumes that the costs of implementing RPEEPs in the social sector will fall to housing providers, whilst the costs of doing so in the private sector will fall to residents. This may lead to distributional differences between social and private residents, on both the take up of measures and the impacts of individual households' disposable income. Only households in the private housing sector are assumed to incur any direct costs, and as a result are considered more likely to make value-based judgements about which in-flat measures are worth the investment.	**Negative**

[8] English Housing Survey, 2020 to 2021: feeling safe from fire - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistics/english-housing-survey-2020-to-2021-feeling-safe-from-fire/english-housing-survey-2020-to-2021-feeling-safe-from-fire

	Businesses will be the recipients of revenue as a result of supplying these measures, and are not expected to incur any significant or adverse costs as under the preferred option it is assumed that social housing sector costs will fall to the public sector.	
(2) Expected impacts on businesses		
Description of overall business impact	Additional costs to business will be incurred by those who act as RPs, such as residential managing agent firms, residential management companies, right to manage companies or landlords. However, it is assumed that private housing RPs will pass on costs to the leaseholders/residents through service charges, where it is possible to do so under the leases or through rent rather than face additional costs themselves. For RPs in social housing there are restrictions around what they are able to charge for and their ability to alter service charges. Businesses producing and/or supplying fire safety measures are likely to receive the cost of in and out of flat measures[9] as a transfer in the form of additional revenue.	**Positive**
Monetised impacts	Businesses will benefit from the revenue transferred from housing providers as they procure the in and out of flat measures suggested by the PCFRAs. These benefits are centrally estimated to be £478 million over ten years. It is important to note that these will be transfer costs as although businesses will benefit through this policy, the benefit is likely to be equal and opposite to the cost faced by private residents. This does not make society better or worse off. Note that this analysis assumes that the money received by the businesses producing these measures will stay in the UK economy. Under the Preferred Option (1) it is assumed that social housing sector costs will fall to housing providers whilst the RPs in the private housing sector will pass these on to the leaseholders/residents where they are able to do so. Therefore, businesses are not required to incur any costs and the Business NPV is centrally estimated to be £478 million.	**Positive** **Based on likely business £NPV**
Non-monetised impacts	No non-monetised impacts.	**Neutral**
Any significant or adverse distributional impacts?	There is not enough accurate data on the proportion of small and micro-businesses that manage high rise and medium rise SE buildings specifically to estimate the proportion or volume of overall costs that would fall on them. However, under the preferred option it is assumed that small and micro	**Neutral**

[9] Measures, such as fire-resistant doors and smoke alarms which are implemented in a residents dwelling are called in-flat measures, while out of flat measures such as emergency signs and ground floor ramps are implemented in a building. These measures ensure the safety and wellbeing of residents.

	businesses will not incur any costs as a result of social housing sector costs falling to the public sector.	
(3) Expected impacts on households		
Description of overall household impact	Those living within in scope private dwellings are likely to face additional costs for in-flat measures. More widely residents may see a small increase in service charges or rent, as it is assumed that RPs operating in the private sector will pass on additional costs where they are able to do so. Private sector RPs may choose to fund in-flat measures; however, this is not the assumption applied in the IA. For RPs in social housing, it is not expected that costs are passed on to residents. There are restrictions around alterations to the service charge and to what RPs are able to charge for. It is therefore assumed that social housing costs will be public sector costs. However, in some cases it is possible for RPs in social housing to pass on these costs to leaseholders in their buildings via service charges. This has further been explored in section 10 where scenario analysis has been conducted.	**Negative**
Monetised impacts	Household NPV is centrally estimated to be -£192 million. It is important to note that these will be transfer costs as although households will face a cost through this policy, the cost is likely to be equal and opposite to the benefit faced by businesses. This does not make society as a whole better or worse off. The equivalent annual net direct cost to households (EANDCH) is centrally estimated to be £24.7 million. The costs estimated for households are pass through costs from RPs in private housing.	**Negative** **Based on likely household £NPV**
Non-monetised impacts	The non-monetised benefits expected as a result of implementing RPEEPs include a reduced fear of fire and a decreased likelihood of casualties and fatalities in relation to residents and buildings in scope. It is also expected that FRS will have access to more information, leading to more efficient evacuations and response to fires in the buildings in scope for the policy.	**Positive**
Any significant or adverse distributional impacts?	The IA assumes that the costs of implementing RPEEPs in the social sector will fall to housing providers, whilst the costs of doing so in the private sector will fall to residents. This may lead to distributional impacts if residents in social housing adopt significantly more measures than residents in private housing, as they do not bear the costs directly. Private residents are more likely to make value-based judgements about which in-flat measures are worth the investment since they will need to fund these themselves.	**Negative**

Part B: Impacts on wider government priorities

Category	Description of impact	Directional rating
Business environment: **Does the measure impact on the ease of doing business in the UK?**	It has been assessed that the preferred option will likely have no impact on the ease of doing business in the UK.	**Neutral**
International Considerations: **Does the measure support international trade and investment?**	This analysis assumes that all benefits to businesses supplying measures will stay within the UK economy.	**Neutral**
Natural capital and Decarbonisation: **Does the measure support commitments to improve the environment and decarbonise?**	RPEEPs is not expected to have any environmental impacts.	**Neutral**

8. Monitoring and evaluation of preferred option

26. The policy will come into force in April 2026 following a transition period, during which RPs will start to implement their schemes. The government has committed funding this year to begin this important work by supporting social housing providers to deliver Residential PEEPs for their renters. Future years' funding will be confirmed through the Spending Review process. As schemes are set up and progress is made, there will be some reporting in relation to the Social Housing Residential PEEPs grant, through which the department will gain access to further information and data related to the policy in action and emergent best-practice. The department will monitor the impact of the policy throughout in support of delivery of the intended benefits.

27. Success of the policy overall will be measured against strategic objectives, demonstrated by an improvement in the fire safety of evacuation impaired individuals within high-rise residential buildings. This will be seen through an improved operational response to fires, and greater assistance for these residents. This is expected to make people safer, and feel safer, in their homes, a result of which could be a reduction in the number of fire related injuries and fatalities.

28. Major fires in high-rise residential buildings are relatively infrequent, and it is difficult to know the extent to which specific measures contribute to overall fire safety. However, the grant for social housing providers will have data and reporting requirements for recipients which will help, over time and as the grants are rolled out, to provide detailed information on take-up. The expectation is that the data collected would reflect progress with the schemes being established (in a social housing context) and reflect some qualitative information on the nature of measures put in place. There is no specific data which is currently collected from RPs which might be expected to provide this. Additionally, as part of the normal engagement with stakeholders and feedback routes to government we would expect local partners or individuals to raise issues and concerns. There is also a toolkit in development that will allow RPs to come forwards with qualitative examples of practice with a view to building a body of best practice. At the point of review, MHCLG could also ask RPs, residents or FRS for information regarding the usage of RPEEPs in real incidents where they have been used.

29. MHCLG and individual FRSs both collect data on fire safety audits and incidents, amongst other FRS activity. This will be closely monitored to identify changes in the prevalence of acceptable fire safety, and the number of fatalities and casualties that result from fires in in-scope buildings.

30. The enforcement of this legislative change will be the same as for other issues which are covered by the FSO 2005, through a range of enforcement approaches including provision of advice to the RP up to enforcement action including prosecution.

9. Minimising administrative and compliance costs for preferred option

31. All tasks included within the proposal provide for the minimum that is required to carry out the safe evacuation of residents with disabilities or impairments in the case of a

fire, to deliver the government's response to the recommendation made in the GTI P1 report.

32. Where there is potential cross-over with requirements imposed by other legislation, MHCLG will make clear in guidance that there is no intent to duplicate work. For example, if there is an existing or broader risk assessment carried out by the RP for residents, guidance will be clear that the RPEEPs PCFRA can be included in this provided the broader assessment includes the specific elements required by this legislation. Similarly, the legislation requires reasonable endeavours by the RP to engage residents but does not constrain them to specific ways of doing this, so they do not need to change any existing processes unnecessarily as long as these meet the requirements of the policy.

10. Main assumptions / sensitivities and economic / analytical risks

33. The best available data has been used in this analysis, but some assumptions have had to be made. Further sensitivity analysis has been conducted to understand the impact of a change in assumptions.

34. A significant risk of the analysis is the wide range in the estimated total costs of RPEEPs in this IA. It is important to note that this range models extreme scenarios over a ten-year period, where the highest values assume that all high-end measures and assumptions simultaneously materialise. For example, that the high end of in-scope residents materialises, that the bundle of goods for in and out flat measures are the most expensive ones available in the market and that there will be a 100 per cent take up of these measures in the social housing sector. This IA does not suggest that this is a likely outcome of RPEEPs, however it has been modelled for analytical completeness. Estimating a reasonable worst-case scenario is not possible at this stage due to a lack of available evidence.

35. Similarly, the large variation in the current market prices of in and out of flat measures[10] is a significant risk of the analysis. This risk exists as it is difficult to precisely estimate the true costs of these measures across all buildings when the RP, in consultation with a resident in-scope, will decide on any necessary adjustments and equipment required. To mitigate this uncertainty this IA incorporates a wide range of costs for households and businesses across the low to high scenarios.

36. The IA also makes a general assumption that the costs of implementing RPEEPs in the social housing sector will fall to housing providers, which is assumed to be a public sector cost as laid out in the preferred option. Whilst the costs in the private housing sector are assumed to fall to residents if Responsible Persons do not pay, for example through an adjustment to the common parts of the building which supports the safety of all residents being charged to the service charge or a rent increase. Private housing sector costs are therefore treated as a private sector cost.

37. A further uncertainty to consider in this analysis is the proportion of residents who would struggle to evacuate in the event of a fire due to a disability or impairment, and

[10] Measures, such as fire-resistant doors and smoke alarms which are implemented in a residents dwelling are called in-flat measures, while out of flat measures such as emergency signs and ground floor ramps are implemented in a building. These measures ensure the safety and wellbeing of residents.

the proportion of these individuals who will end up self-identifying and engaging with the RPEEPs process. Scenario analysis has been conducted to account for this risk. Conversations with RPs around the proportion of their residents that are mobility impaired forms the low estimate as mobility impairments do not necessarily cover all impairments that might impact an ability to evacuate, and the sample size of RPs was very small. The proportion of dwellings with a resident with long term illness or disability, split by tenure, is used to form the high estimate as it is recognised that this may cover a wider range of disabilities than just those that impair mobility. The central estimate is the average of these two estimates.

38. The extent to which in-scope residents will take up the in and out of flat measures is highly uncertain, yet it has a significant impact on the total costs. This is reflected in scenario analysis using a low to high range. It is assumed that the take up rate varies depending on whether the costs fall to housing providers or the resident. The take up rate applied to the private sector is the average of the proportion of unsatisfactory fire safety audits and the proportion of high-rise residents who feel unsafe from fire. The take up rates applied to the social housing sector assume that residents will be more likely to seek more measures if they do not face the costs of doing so. The wide range in final costs reflects that there is significant uncertainty in the take up rate.

39. The speed at which SE buildings are remediated and moved to a stay put strategy[11] is uncertain due to an absence of evidence and evaluation on remediation work to date. Sensitivity analysis has been conducted to understand the impact of a change in this assumption on the final NPSV.

40. Due to the difficulties in accurately attributing a reduction in casualties and fatalities to this policy alone, the NPSV does not accurately or comprehensively reflect the potential benefits of RPEEPS to the economy. Similarly, the reduction in the fear of fire for people with disabilities or impairments living in high-rise or high-risk buildings is not monetised in this IA.

41. There is uncertainty around the number of buildings that will already have in or out of flat measures. This IA assumes that not all in-scope residents will obtain all the in-flat items available (since measures will be tailored to specific requirements). The inputs used to estimate the three-point take up rate range are assumed to account for this, as buildings without the appropriate measures will be accounted for in the fire safety audit source as well as the fact this will be reflected in the prevalence of fear of fire amongst residents.

42. This IA includes installation costs for fire resistant doors for in-flat measures. Where installation costs are not included, either the costs are assumed to be insignificant, or the skills required are not specialist and it is assumed that the work will be conducted through existing maintenance contracts.

43. The ongoing costs are assumed to be 20 per cent of the set-up costs per year. This is because reviews of resident PCFRAs are expected to take 15 per cent of the amount of time and resource of the initial PCFRA. In addition to this, the churn rate of in scope

[11] Stay Put is based on the principle of compartmentation – that a fire will be contained to one unit in the building, ensuring other resident's safety and allowing the FRS to respond to the fire. In the case of a fire, only the residents of the flat where the fire started are advised to evacuate. Other residents in the building are advised to remain in their flats if they are not impacted by smoke, heat, fire etc or are told to leave by the FRS.

residents, and rate of residents needing an initial PCFRA, is expected to be five per cent. This assumption applies for both resource (all admin costs) and capital (in and out flat measures) costs.

44. This IA assumes that the number of high-rise residential buildings will remain constant over the appraisal period. This is unlikely given the increasing population and subsequent increased need for dense housing such as high-rise buildings. This creates a risk that the costs could increase in the future as more buildings become within the scope of RPEEPs.

45. It is assumed that the proportion of residents that will be in scope of RPEEPs remains constant over 10 years. This is unlikely given the aging population and that new disabilities and impairments will in any case arise, regardless of age. This creates a risk as the cost of RPEEPS could increase in the future as more residents require in and out of flat measures.

46. Optimism bias of 10 per cent has been applied to the cost of in and out of flat measures to account for any inherent optimism present in the analysis. This level has been chosen as the central cost is the average of a low and high-cost estimate taken directly from industry, and already accounts for known fluctuation in prices. The goods in scope are off-the-shelf products as opposed to anything bespoke that would encourage additional optimism bias.

47. This analysis assumes that the cost of in and out of flat measures is transferred to domestic businesses and stays within the UK economy. The cost of in and out of flat measures is therefore treated as a transfer and is not considered in the overall NPSV. However, there is a chance that UK businesses will procure the measures from international companies, meaning that a portion of the benefits will leave the UK economy risking an overestimation of the total benefits. The extent to which this will occur is unknown so it is assumed, for the purposes of this IA, that the benefits will remain in the UK.

48. In a scenario conducted for sensitivity purposes, where costs in both the social and private housing sector fall to residents, the take up rate for the in flat measures will fall from the preferred option take up rate (of 75 per cent, in a range of 50 to 100 per cent) to a take up rate of 33 per cent, in a range of 5 to 50 per cent. The costs in this scenario are estimated to be £352 million (ranging from £9.73 million to £1,710 million). Of this, social housing costs will be £161 million (ranging from £3.49 million to £809 million) over ten years.

Declaration

Department:

Ministry of Housing, Communities and Local Government

Contact details for enquiries:

FireSafetyPolicy@communities.gov.uk

Minister responsible:

Alex Norris (Building Safety, Fire and Local Growth Minister)

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed: 

Date: 03/07/25

Summary: Analysis and evidence

Price base year: 2025

PV base year: 2025/26

		0. Do nothing	1. RPs put in place RPEEPs in all high-rise (18m+ or 7 or more storeys) buildings and buildings between 11 and 18m with an SE strategy in place in England, in either case where there are two or more domestic premises (preferred option).
Costs (£m) (Covering RPEEPs and Evacuation Plans) *Note that these costs include extreme low and high scenarios, for which numerous low and high assumptions must materialise simultaneously.*	Low	0	13.8
	High	0	2,390
	Best	0	508
			Includes costs for private housing which will likely fall on households and costs for social housing that will fall on housing providers. Please note these costs include in the costs of evacuation plans. **<u>Set Up Costs (£m)</u>** **Private: 77.0** Private housing sector: 77.0 **Public: 126**

			Social housing sector: 126 **<u>Ongoing Costs (£m)</u>** **Private: 115** Private housing sector: 115 **Public: 190** Social housing sector: 190
Benefits (£m)	Low	0	7.54
	High	0	2,330
	Best	0	478
			Set Up Benefits (£m) Private: 69.8 Public:120 **Ongoing Benefits (£m)** Private: 106 Public: 182 Non-monetised benefits include reduced risk to life and increased fire safety on an ongoing basis
Net present social value (£m)	Low	0	-6.25
	High	0	-62.6
	Best	0	-29.9

	N/A	The cost of the measures is seen as a transfer cost and is therefore not included in the final NPSV.
Public sector financial costs	None	The social housing sector costs are assumed to fall on the housing providers. The total social housing cost is centrally estimated to be £316 million (discounted).
Significant un-quantified benefits and costs	None	Non-monetised benefits include greater fire safety within in scope buildings and reduced risk to life and limb.

Key risks	NA	Key risks include the lack of data available. Assumptions have been made when monetising costs, while the benefits of reduced threat to life and limb have not been monetised. A significant risk of the analysis is the wide range in the estimated total costs of RPEEPs. This is a result of a large range in the potential cost of measures and low levels of certainty around take-up rates. Extreme scenarios have therefore been modelled for analytical completeness. These extremes represent the absolute best and worst-case scenarios, and it is important to note that the IA does not suggest that these scenarios are a likely outcome, however estimating a "reasonable" best and worst-case scenario is not possible at this stage due to a lack of available evidence. These scenarios are explained in greater detail in the sensitivity section. Optimism bias of 10 per cent was added to the cost of in and out flat measures to account for any inherent bias here.
Results of sensitivity analysis	None	Sensitivity analysis is conducted around the rate at which SE buildings move to a stay put strategy. To do this, varying rates were tested and estimated. The results indicated that the impact of the number of medium-rise SE buildings on the overall NPSV is relatively small. Although there is a risk around the assumption of number of medium-rise buildings moving to stay put, the impact of this is relatively minor as the majority of in-scope buildings are high-rise.

Evidence base

A. Strategic objective and overview

A.1 Strategic Objective

1. This legislation fits within the Home Office's encompassing strategic objective to improve public safety and security. Specifically, the policy aims to reduce the impact of fires by improving the protection against fire risks through fire policy reform, considering the findings of the GTI P1[12] report.

A.2 Background

2. The Grenfell Tower Fire (14 June 2017) was a national tragedy that resulted in the greatest loss of life in a residential fire since the Second World War[13]. Following the fire, a full public Inquiry into it was commissioned. The Inquiry was split into two phases which have both now concluded. Phase 1 concentrated on the events and actions taken on the night of the fire, including the emergency response.

3. The government is determined to learn lessons from the fire and ensure that others do not suffer the loss and trauma that the Grenfell community has faced as a result of the events in June 2017. Actions taken by previous governments in the years that have passed since the fire include:

    - Setting up and acting on the recommendations of Dame Judith Hackitt's independent review of building and fire safety[14].
    - Commissioning the Grenfell Tower Public Inquiry.
    - Establishing a remediation programme to fully fund the cost of replacing unsafe cladding for all leaseholders in residential buildings 11m and over in England.
    - Establishing a Fire Protection Board, chaired by the Chair of the National Fire Chiefs Council, which lead a programme of work, supported by £10 million of previous government funding, to ensure that all high-rise residential buildings in England were inspected or reviewed by the end of 2021.
    - Undertaking a public consultation on Fire Safety in 2020 which was open for 12 weeks.
    - Publishing the government response to the Fire Safety consultation[15].
    - Undertaking a public consultation on PEEPs in 2021[16] which was open for six weeks.

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12 Grenfell Tower Inquiry Phase 1 report: https://www.grenfelltowerinquiry.org.uk/phase-1-report

13 Grenfell Update Debate – Monday 2 November: https://hansard.parliament.uk/Commons/2020-11-02/debates/20110250000012/GrenfellUpdate

14 Dame Judith Hackitt's Review: https://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report

15 Fire Safety 2020 Consultation and government response: https://www.gov.uk/government/consultations/fire-safety/outcome/fire-safety-government-response-accessible-version

16 PEEPs Consultation and Government Response: https://www.gov.uk/government/consultations/personal-emergency-evacuation-plans

- The Fire Safety Act 2021 and the Fire Safety (England) Regulations 2022[17] have come into force and the Regulatory Reform FSO 2005 has been amended through the Building Safety Act 2022.[18]
- The Fire Safety Act 2021 clarified that flat entrance doors, structure and external walls are all in scope of the FSO 2005[19] which means each element must be considered in a fire risk assessment for any multi-occupied residential premises with two or more sets of domestic premises.
- The Fire Safety (England) Regulations 2022 introduced new requirements on those responsible for fire safety in blocks of flats including installation of certain fire safety measures, regular checks of fire doors and instructions to be shared with residents on what to do in the event of a fire.
- The amendments to the FSO 2005 through the Building Safety Act 2022 include a requirement on those responsible for fire safety in any regulated premises to record their fire risk assessment and fire safety arrangements. Additionally, new requirements for information sharing with residents including the risks and mitigations identified in the fire risk assessment, among others.

4. On 30 October 2019, the GTI P1 report was published. It included a number of recommendations regarding improving the construction, refurbishment, and management of high-rise residential buildings, and the response of the FRSs to fire in such buildings. These recommendations were accepted in principle by the government on the day of the report's publication.
5. The report also made a number of important recommendations relating to the safe evacuation of all residents in high-rise buildings, especially those who are unable to self-evacuate. The Inquiry's recommendations that are specific to this policy and require changes in law are recommendations 33.22 (e) and (f). These state:

   "e) (…) that the owner and manager of every high-rise residential building be required by law to prepare personal emergency evacuation plans (PEEPs) for all residents whose ability to self-evacuate may be compromised (such as persons with reduced mobility or cognition).

   f) (…) that the owner and manager of every high-rise residential building be required by law to include up-to-date information about persons with reduced mobility and their associated PEEPs in the premises information box."[20]
6. Closely related (and addressed as well in the consultation) is:

   33.22(c): "that the owner and manager of every high-rise residential building be required by law to draw up and keep under regular review evacuation plans, copies of which are to be provided in electronic and paper form to their local fire and rescue service and placed in an information box on the premises"

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17 Fire Safety (England) Regulations 2022: https://www.legislation.gov.uk/uksi/2022/547/contents/made
18 Building Safety Act 2022: https://www.legislation.gov.uk/ukpga/2022/30/contents
19 Factsheet detailing changes made by the Fire Safety Act 2021 to the FSO 2005: https://www.gov.uk/government/publications/fire-safety-act-2021/fire-safety-act-2021-factscheet-information-on-commencement-of-sections-1-and-3-of-the-fire-safety-act
20 Grenfell Tower Inquiry Phase 1 Evacuation recommendations: https://assets.grenfelltowerinquiry.org.uk/GTI%20-%20Phase%201%20full%20report%20-%20volume%204.pdf

7. The FSO 2005 principally adopts a risk-based approach to fire safety requiring RPs to ensure that general fire precautions are in place. This risk-based approach is further explained in Article 9 of the Order[21]. The FSO 2005 also states that the RP needs to record the prescribed information including, as outlined in Article 9 (7) (b) "*any group of persons identified by the assessment as being especially at risk*."

8. To enact a change in law, it is proposed to use the power in Article 24[22] of the FSO 2005 to address the recommendations by making regulations setting out precautions which will need to be taken, or observed, by those on whom such duties are imposed; along with a power in Article 21A FSO 2005 to make regulations requiring RPs to give residents relevant information about fire safety matters . The FSO 2005 applies to all premises (save for those expressly excluded) including workplaces and the non-domestic parts of all multi-occupied residential buildings. Regulations made under Article 24 of the FSO 2005 can apply new requirements to RPs and duty-holders, including building owners and building managers with control of premises.

9. Using the FSO 2005 through the regulation making powers described fits with the intention to ensure that those responsible for relevant buildings take the necessary steps to ensure that residents are safe. The responsibilities and requirements imposed on RPs (and/or duty-holders) will be generally linked to matters over which they have control. The RP will need to demonstrate that they have done all that could reasonably be expected of them and exercised all due diligence, to avoid committing an offence.

10. FRS will be able to take enforcement action against any relevant RP (or duty-holder) who does not comply with these requirements. Failure to comply with regulations is a criminal offence, where doing so places one or more relevant persons at risk of death or serious injury in case of fire. The relevant RP could be subsequently prosecuted and if found guilty could be liable to an unlimited fine, imprisonment (for up to two years) or both.

11. RPs already have a duty to take general fire precautions as may reasonably be required to ensure, in relation to "*relevant persons*", that the premises are safe. In doing so, the RPs must also ensure that there are adequate means of escape from the building and that the means of escape can be safely and effectively used[23]. The term "*relevant persons*" includes anyone who is lawfully on the premises or in the immediate vicinity of the premises at risk from a fire on the premises. For multi-occupied residential premises, this includes residents.

A.3 Groups Affected

12. The proposed legislation would affect the following groups:

- **Residents of high-rise residential buildings and medium-rise residential buildings with an SE strategy in place[24]**: Residents who have a disability or impairment and may have difficulty evacuating will be affected as they will be engaged with by RPs to undertake risk assessments and have details of where

[21] The Regulatory Reform (Fire Safety) Order 2005: https://www.legislation.gov.uk/uksi/2005/1541/article/9

[22] The Regulatory Reform (Fire Safety) Order 2005: https://www.legislation.gov.uk/uksi/2005/1541/article/24

[23] As stated in Article 4 of the Regulatory Reform (Fire Safety) Order 2005: https://www.legislation.gov.uk/uksi/2005/1541/article/4/2014-04-01

[24] As the Inquiry did not take a position on a height threshold for high-rise buildings, it is proposed that a high-rise residential building is defined as being at least 18 metres in height or having at least seven storeys.

they reside made available to the local FRS (where they consent to information being shared). Those who live in private housing may be responsible for paying for in-flat fire safety/evacuation measures where they are the only beneficiary (only where they are willing to do so).

- Out of scope residents will only be affected should there be adjustments to the common parts of the building which are charged to the service charge account because these will be beneficial to the majority of residents who live there at the time. There will, in addition, be a small cost to all residents from having the RPEEPs scheme in place, including the RP reaching out to residents, conducting PCFRAs, and passing info to the FRS (this is the 'administrative cost' of the policy).
- **RPs for high-rise residential buildings and medium-rise residential buildings with an SE strategy in place, and duty holders.** There will be new requirements for RPs, and they will be required to comply with the new legislation. This will affect both the private sector and the public sector (local authority and housing association RPs). As with the residents affected, RPs will be affected in all high-rise buildings and in medium-rise buildings under SE strategies. Moreover, people who own dwellings/leasehold in the buildings could also be affected. There is a possibility that they could then pass on any costs to renters through increases in rent.
- **Enforcement authorities**: These include FRAs as the leading enforcement authority for non-domestic premises under the FSO 2005. Enforcement authorities will be able to take enforcement action against any relevant RP who does not comply with the new legislation.

A.4 Consultation

Within government

13. The Home Office engaged with several government departments and devolved administrations as part of the development of the consultations, including:
    - Department for Business, Energy and Industrial Strategy (BEIS).
    - Ministry of Defence (MoD).
    - Department for Education (DfE).
    - Department of Health and Social Care (DHSC).
    - Ministry of Housing, Communities, and Local Government (MHCLG).
    - Ministry of Justice (MoJ).
    - HM Treasury.
    - The Welsh Government.
    - The Scottish Government.
    - Northern Ireland Executive.
    - Health and Safety Executive (HSE).

Public consultations

14. To fulfil this requirement, the previous government put forward proposals on PEEPs as part of the Fire Safety consultation which ran from 20 July 2020 to 12 October 2020[25]; and the subsequent PEEPs consultation in 2021[26]. Following the responses to that second consultation, further discussions with stakeholders, and additional research, new policy proposals to address the Inquiry's recommendations regarding PEEPs and Evacuation Plans were developed and consulted upon in the 2022 Emergency Evacuation Information Sharing plus (EEIS+) consultation[27]. This IA relates to those proposals, as amended in light of the responses received during the EEIS+ consultation.

15. Proposed implementation of these proposals is intended to be enacted under Article 24 of the FSO 2005 which requires consultation with appropriate persons or bodies.

B. Problem under consideration, with business as usual, and rationale for intervention

16. The Grenfell Tower fire and the GTI P1 Report and specifically the PEEP recommendations indicate that there is more to do to ensure to the safety of all residents in high-rise residential buildings, and especially those who are unable to self-evacuate.

17. For context, in the year ending June 2024, FRSs attended 25,260 dwelling fires[28] of which 704 occurred in purpose built high-rise flats (10+ storeys). There were three fire-related fatalities and 124 non-fatal casualties in purpose built high-rise flats in the year ending June 2024[29].

18. To address these recommendations as set out in the GTI P1 report, legislative changes are required, which can be achieved by new regulations via Article 24 of the FSO 2005. The new regulations will also ensure that those required to comply with the FSO 2005 are clear about their roles and responsibilities, and that those affected by it feel safe, and are safe, in their homes.

19. These proposals would create new duties with respect to all high-rise residential buildings and medium-rise residential buildings with an SE strategy in place. These duties will be applied across England.

C. Policy objective

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25 Fire Safety, Government Consultation - Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/919566/20200717_FINAL_Fire_Safety_Consultation_Document.pdf

26 PEEPs, Consultation Outcome- GOV.UK: https://www.gov.uk/government/consultations/personal-emergency-evacuation-plans

27 EEIS+, Consultation Outcome- GOV.UK: https://www.gov.uk/government/consultations/emergency-evacuation-information-sharing

28 FIRE0102, Fire statistics data tables - GOV.UK: https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

29 FIRE0205, Fire statistics data tables- GOV.UK: https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

20. The policy objective is to reduce the societal harm caused by fires in high-rise buildings. The Residential PEEPs regulations aim to support the fire safety and evacuation of residents who may be considered vulnerable due to their physical or cognitive condition compromising their ability to evacuate a building. The building level evacuation plans regulation aims to improve fire safety for all residents. The intended outcomes will be a reduced number of fire-related injuries and fatalities and increased level of fire safety within higher risk buildings. These outcomes are expected to occur from the point of implementation onwards.

21. The policy also aims to ensure that:

    - Residents in high-rise residential buildings, and medium-rise buildings with SE strategies can feel reassured that government has learnt lessons from the Grenfell Tower tragedy and has taken the appropriate steps to ensure their safety so that they feel safe, and are safe, in their homes.
    - The government delivers against its plan to implement the Inquiry's recommendations in principle.

22. Indicators of success will include an increased level of fire safety within in scope buildings, which may be reflected in more acceptable fire safety checks, and more efficient evacuations of residents with an evacuation impairment. Another indicator of success will be a reduced fear of fire among residents with evacuation impairments living in high-rise, high-risk buildings.

D. Description of options considered

- **Option 1 (preferred):** Regulation will require that RPs put in place 'RPEEPs' for high-rise (18m+ or at least 7 storeys) residential buildings and residential buildings between 11 and 18m with an SE strategy in place in England.

23. **The Preferred Option (Option 1)** will be given effect via secondary legislation made under powers in the FSO 2005 with the exception of one clause which will be given effect via primary legislation. The new secondary regulations will come into force in April 2026 to allow sufficient time for the sector to adjust. The regulations will be accompanied with a RPs Toolkit and factsheet to support the policy implementation ahead of FSO 2005, Article 50[30] Guidance being produced ahead of the regulations coming into force.

24. The Primary legislative provision (requiring consideration of the provision of in flat measures) will be introduced in due course subject to parliamentary process and priority. However, officials will include in the above-mentioned Article 50 guidance that RPs could and should consider in flat mitigations as they are often a more proportionate response, and it is the government's intention to make this a legal requirement in future.

25. Fire and Rescue Services will be able to enforce in relation to the requirement for RPs for buildings within scope of the new legislation to have a Residential PEEPs process in place. Under the Building Safety Regulator (BSR) regime it is required in law that every building landlord puts in place a way for residents to communicate with them on

[30] The Regulatory Reform (Fire Safety) Order 2005: https://www.legislation.gov.uk/uksi/2005/1541/article/50

building safety matters[31] and are able to raise concerns – Residents Panel[32]. Residents would be able to raise any Residential PEEPs concerns through this route, with ultimate recourse to the BSR.

E. NPSV: monetised and non-monetised costs and benefits of each shortlist option (including administrative burden)

26. The following sections present the analysis of costs and benefits of the preferred option outlined within this IA.

27. Previous IAs on PEEPs and EEIS were published on the 8 June 2021[33] and 18 May 2022[34] respectively. The methodology in this section has been altered and improved to account for updated data and the final RPEEPs policy proposal.

28. Proposals on evacuation plans (and RPEEPs) were also considered as part of the Fire Safety consultation IA, published on the 9 July 2020[35].

General assumptions and data

29. The best available data has been used for this IA. Costings for the appraisal section are based on data primarily from MHCLG, the Home Office, the National Fire Chiefs Council (NFCC) and from RPs identified through the PEEPs consultation (the local initiatives described in the government response to that consultation).

30. The appraisal period is 10 years in line with HM Treasury, Green Book (2022) guidance[36]. A social discount rate of 3.5 per cent is used to discount future values to present values. All costs and benefits are in 2025/26 prices (price base year, PBY) with a 2025/26 present value base year (PVBY).

31. Transition/set-up costs are assumed to occur in year 1 only, and ongoing costs are expected to occur from year two of the policy onwards.

32. All values have been rounded to three significant figures for consistency. Please note that some figures may not sum due to rounding.

33. The main assumptions used in this IA are listed in Table 1 below:

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31 Building Safety Act 2022 detailing responsibilities of the BSR: https://www.legislation.gov.uk/ukpga/2022/30/notes/division/3/index.htm#:~:text=The%20amendments%20require%20that%20all%20Responsible%20Persons%20%28RPs%29,the%20Building%20Safety%20Act%29%20in%20the%20same%20premises.

32 BSR Resident's Panel: Statutory Residents Panel - Building safety - HSE

33 Personal Emergency Evacuation Plan Consultation IA- Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991912/PEEPs_consultation_IA.pdf

34 Emergency Evacuation Information Sharing Consultation IA- Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076190/20220512_EEIS_IA_Signed.pdf

35 The Regulatory Reform (Fire Safety) Order 2005 consultation on changes to the Order and new regulation- Home Office: Fire safety consultation impact assessment (accessible version) - GOV.UK

36 The Green Book 2022- GOV.UK: https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-governent/the-green-book-2020

Table 1: General Assumptions

ID	Assumption Description
1.1	It is assumed that there are 12,000 high-rise 18m+ residential buildings, which consist of 691,000 dwellings. This was taken from MHCLG's September 2023 Building Safety Programme data release.[37]
1.2	The number of medium-rise buildings (four to six stories or 11 to 18m) with an SE strategy in place is assumed to be 531. This is based on information supplied by FRS.[38] This estimate relies entirely on the accurate reporting of RPs to FRS. The same data shows that 48 SE buildings are four to six stories, but over 18m in height. This uncertainty is reflected in a 10 per cent range around the figure of 531 in the appraisal, and a further 10 per cent is added to reflect the uncertainty of self-reporting methods. The government assumes that the number of SE medium-rise buildings lies in a range of 425 to 637, with a central estimate of 531.
1.3	Further, it is assumed (in line with the previous EEIS+ consultation IA[39]) that the number of medium-rise buildings leaving SE strategy will be 10 per cent of the initial number each year as steps are taken to improve the safety of these buildings, until a steady state of 30 per cent of current stock is reached.
1.4	The proportion of residents assumed to be evacuation impaired is the average of the low and high estimates; 28.3 per cent in social housing and 16.4 per cent in private housing. The high estimate for the number of evacuation-impaired people eligible for a PCFRA is taken from the 2021/22 English Housing Survey.[40] This states that 54 per cent of social renters and 30.1 per cent of private renters were estimated to be mobility-impaired and is taken for the high estimate. Based on engagement with a random sample of RPs, 2.7 per cent of residents were estimated to be mobility impaired. This is taken to be the low estimate.
1.5	The labour cost of an RP is assumed to be the average labour compensation per hour worked for 'real estate activities' as reported by the ONS,[41] which is £24.95 in 2023 prices. Uprated to 2025/26 prices using HM Treasury's GDP Deflator,[42] the gross hourly RP labour cost is assumed to be £26.58.
1.6	The RPs will be required to reach out to all residents in in-scope buildings to establish who is eligible for a PCFRA and in-scope of the RPEEPs proposal.

37 Building Safety Programme: monthly data release, September 2023- GOV.UK: https://www.gov.uk/government/publications/building-safety-programme-monthly-data-release-september-2023

38 Internal Home Office estimates based on Interim Measures Dataset compiled by NFCC.

39 Emergency Evacuation Information Sharing Consultation IA - Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076190/20220512_EEIS_IA_Signed.pdf

40 English Housing Survey 2021 to 2022: social rented sector - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistics/english-housing-survey-2021-to-2022-social-rented-sector/english-housing-survey-2021-to-2022-social-rented-sector

41 Table 4, Labour costs and labour income, UK - Office for National Statistics (ons.gov.uk): https://www.ons.gov.uk/economy/economicoutputandproductivity/productivitymeasures/datasets/labourcostsandlabourshare

42 GDP deflators at market prices, and money GDP - GOV.UK: https://www.gov.uk/government/collections/gdp-deflators-at-market-prices-and-money-gdp

	This is assumed to take on average five minutes (low estimate 2.5 minutes, high estimate 7.5 minutes) per resident, and is based on the EEIS+ consultation IA. This range accounts for some RPs being able to easily contact all residents, and others being harder to contact. It also includes the time residents may need to establish if they are eligible.
1.7	The time to complete a PCFRA is assumed to take two hours across all scenarios, which matches the assumption in the PEEPs IA.[43]
1.8	In-flat measures as a result of a PCFRA are modelled to consist of various items (see Table 2). It is assumed that not all in-scope residents will obtain all of the in-flat measures. For the take up rate in the private sector, Home Office statistics show that, between 2020/21 and 2023/24, an average of 61 per cent of fire safety audits conducted by FRSs found premises to be satisfactory in relation to the FSO 2005.[44] This is taken to be a reasonable proxy to assume that 39 per cent[45] of residences will be found to require further measures in a PCFRA. Also, the English Housing Survey 2020/21 'feeling safe from fire' supplementary table suggests that 26 per cent of high-rise residents do not feel safe from fire in their homes.[46] The central estimate for the 'take-up rate' of in-flat measures as a result of a PCFRA is assumed to be 33 per cent, the average of these two figures (39 per cent and 26 per cent). The appraisal uses a low and high range of 5 per cent and 50 per cent around this figure to reflect uncertainty in the use of in-flat measures as they will only be recommended and are down to the discretion of the RP whether to suggest them as a fire safety measure. The take-up rate in the social housing sector is assumed to have a range of 50 to 100 per cent, with a central estimate of 75 per cent. This IA does not suggest that this low or high assumption is as likely as the central assumption, rather it is modelled for analytical completeness. In the scenario where costs will fall to the housing providers, rather than residents themselves, it is expected that take up will be higher than for those facing the costs themselves. Out-of-flat measures as a result of a PCFRA are also modelled to consist of various items (see Table 3). The take up rate for out-flat measures is estimated to be in a range of 20 to 80 per cent with a central estimate of 50 per cent. For the central estimate, it is assumed that since 28 per cent of residents are in scope, each building will contain at least one in scope resident and will

[43] Personal Emergency Evacuation Plan Consultation IA- Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991912/PEEPs_consultation_IA.pdf

[44] FIRE1202a, Fire Statistics data tables- GOV.UK (www.gov.uk): https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables
A Fire Safety Audit is a planned visit by an FRS to carry out a comprehensive assessment of the level of compliance with the requirements of the Regulatory Reform (Fire Safety) Order 2005 (FSO) in a particular premises. The result of each audit should be recorded as unsatisfactory if further action is necessary to bring the premises up to compliance.

[45] This figure is estimated by subtracting the 66 per cent of satisfactory premises by 100. Moreover, the data for premise type was filtered so that we only looked at audits that took place in purpose-built flats that were more than four floors.

[46] English Housing Survey, 2020 to 2021: feeling safe from fire - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistics/english-housing-survey-2020-to-2021-feeling-safe-from-fire/english-housing-survey-2020-to-2021-feeling-safe-from-fire

	require some level of out of flat measures. A central point of 50 per cent has been applied to reflect an average bundle. A take up rate of 80 per cent has been assumed for the high scenario as although most buildings will be in scope for out flat measures it is highly unlikely that all of them will require all of the measures. Similarly, there could be buildings which may only require one of the five out flat measures to aid vulnerable residents in evacuation and therefore a take up rate of 20 per cent is applied to the low scenario. The appraisal uses the same wide range of out of flat take up rates for the private and social housing sector as it is assumed that the cost of out flat measures are more likely to be spread across all leaseholders or residents in a building, as opposed to the individual, like the cost of in flat measures are. The take up rate remains uncertain, as it depends on each RPs discretion. Wide ranges have been applied to estimate the costs as a result.
1.9	Approximately 64 and 36 per cent of high-rise dwellings are private housing and social housing, respectively. For medium-rise SE buildings, the split is approximately 61 and 39 per cent private housing and social housing, respectively. This is laid out in the English Housing Survey dwellings statistics.[47] For the high-rise buildings, the "purpose built flat high-rise" for all social housing figure is divided by the "all tenures" figure to give the social housing percentage. For the medium-rise SE buildings, the same is done using the "purpose built flat low rise" figures. To estimate the private housing percentage the social housing percentage for each of those building types have been subtracted from 100 per cent. It is assumed that the split of costs between the social and private housing sector is in line with the split of tenure.
1.10	The ongoing costs for RPs to update PCFRAs consist of two components. a) Firstly, the residents who remain in high-rise residential buildings will need to have their PCFRAs reviewed annually or when their circumstances change to allow for revisions to be made. The length of these updates is expected to vary from person to person with the majority likely to be quick catch ups between the resident and the RP to establish that their circumstances have not changed. However, some updates may be longer if circumstances have changed. It is assumed that these reviews take 10 to 20 per cent of the time taken to do the initial assessment, with a central estimate of 15 per cent. b) Secondly, some residents will move in and out of high-rise residential buildings over time. Some residents moving into high-rise residential buildings will require new PCFRAs to be created, and when a resident with a PCFRA moves out of a high-rise building, their PCFRA will no longer need to be updated (but FRAs will need to be updated on its removal). The English Housing Survey 2021/22 headline report[48] shows

[47] Table 1.6, Annex tables for English Housing Survey headline report 2022 to 2023 - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistics/annex-tables-for-english-housing-survey-headline-report-2022-to-2023

[48] Figure 1.10, English Housing Survey 2021 to 2022: headline report - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistics/english-housing-survey-2021-to-2022-headline-report/english-housing-survey-2021-to-2022-headline-report#section-1-households

	resident 'turnover' in different housing tenures (private, social, and owner-occupied). The net percentage of new residents for that year was 2 per cent for private rented, 1.75 per cent for social rented and 1.29 per cent for owner-occupiers (these equal approximately 5 per cent). It is assumed these figures roughly equate to high-rise and medium-rise tenures. This IA assumes that from year 2, the cost required to annually update each PCFRA is equal to 20 per cent[49] of the cost of the original PCFRA assessment in year 1, lying in a range of 15 to 25 per cent.
1.11	The RPs will be required to provide an information box within all in scope buildings, where the FRA has requested that information prescribed under the RPEEPs regulations is to be kept in such a box (18m + buildings are already required to have an information box under the Fire Safety (England) Regulations 2022). The average cost of a box is assumed to be £395, but this can range from £55 to £733. This is reflected in the low, central, and high scenarios. These figures were taken from the EEIS+ consultation IA 2022[50] and uprated for 2025/26 prices using the HMT GDP deflator.
1.12	The time taken for an RP to add PCFRA information to the box is assumed to be 10, 15 and 20 minutes per PCFRA in the low, central, and high scenarios.
1.13	Evacuation plans: a) It has been assumed that in a building of 11 to 18m in height, it will take one to two hours to create an evacuation plan (central estimate 1.5 hours) and in buildings 18m+, it is assumed it will take four to eight hours (central estimate six). b) It is expected that evacuation plans will take longer to create in taller buildings, as they will likely have more complexities. RPs are expected to create the evacuation plans. c) It is assumed that four per cent of evacuation plans will require a major review every year. The major review process has the same assumptions as the initial plan creation. The other 96 per cent will undergo a minor review each year, with a time range of two, five, and ten minutes in the low, central, and high scenarios. These times are the same for each building height. d) It is assumed it will take 15 to 45 minutes (central estimate 30 minutes) for RPs in medium-rise SE or high-rise residential buildings to provide their local FRS with an electronic copy of an evacuation plan for their building and to place a hard copy of this plan in the information box on site.

[49] Summing the two components of PCFRAs to give us the 20 per cent central estimate.

[50] Emergency Evacuation Information Sharing Consultation IA - Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076190/20220512_EEIS_IA_Signed.pdf

Appraisal

COSTS

Option 0: To take no action and make no legislative changes (do-nothing).

34. Under 'Option 0: No legislation is undertaken, and so there is no impact of the proposals and therefore no costs will be incurred. This is the baseline against which all options are measured.

The Preferred Option:

35. The Preferred Option (Option 1) costs and benefits have been monetised to compare against the 'do-nothing' baseline.

Set-up costs

36. There will be set-up costs in year 1 of the appraisal period as vulnerable individuals that live in in-scope buildings and opt in will require a PCFRA.

Familiarisation – RPs

37. RPs will be required to familiarise themselves with the guidance. Some RPs will potentially be responsible for multiple buildings, and so would not need to read the guidance for every building. However, due to the absence of data on RPs that are responsible for multiple buildings and a low expected overall impact on the costs, this is not accounted for. The government assumes that the number of RPs is equal to the number of high-rise (18m+) and SE medium-rise (11 to 18 m) buildings.

38. The guidance is expected to be approximately 10 to 18 pages in length, with a central estimate of 14 pages. It is estimated there will be approximately 200 to 300 words per page, with a central estimate of 250 words.[51] Multiplying these together and accounting for average reading speeds of 600 to 800 words per minute, with a central estimate of 700, plus re-read and comprehension time, gives an average familiarisation time of 3 to 14 minutes, with a central estimate of 7 minutes per building.

39. The cost to RPs of familiarising themselves with the guidance accompanying these measures is calculated as: (see assumption 1.5 in table 1)

    Time to read the guidance (hrs) x Total volume of in-scope buildings x RP wage (£/hr)

40. Taking the above estimates and the assumed cost of RP labour in assumption 1.5 of Table 1, the estimated familiarisation cost lies in a range of **£0.02 million to £0.08 million**, with a central estimate of **£0.04 million**.

Familiarisation – Residents in scope

41. In-scope residents will also be expected to familiarise themselves with the guidance. The number of in-scope residents who need to familiarise is assumed to be equal to the number of dwellings in all high-rise (18m+) and medium-rise SE (11 to 18 m) buildings, as it is assumed that only one person per dwelling would need to read the guidance. This appraisal assumes that the time residents take familiarising themselves

[51] Estimates taken from the 2022, Emergency Evacuation Information Sharing Consultation IA- Home Office: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076190/20220512_EEIS_IA_Signed.pdf

with the new guidance and legislation would otherwise have been spent on leisure purposes. The value of an hour of leisure is proxied with the DfT cost of an hour spent on an 'other' trip.[52] This is calculated to be £4.66 in 2025/26 prices.

42. Assuming the same reading time as above, the estimated familiarisation cost for residents in scope lies in a range of **£0.16 million** to **£0.74 million**, with a central estimate of **£0.35 million**.

Familiarisation – Firefighters

43. It is assumed that all operational (Wholetime and on-call) firefighters will be required to familiarise themselves with the guidance. Non-London firefighter wages are taken from the 2024 Fire Brigades Union pay settlement[53]. To calculate equivalent London wages, the national wages are uprated by the proportional difference between the current national living wage (£12.2[54]) and the London living wage (£13.9[55]), which is a 13.4 per cent uplift. A further 30 per cent uplift[56] is applied to firefighter wages to account for non-wage costs.

44. Data on the number of firefighters is taken using FIRE1102a[57] to get full-time equivalent numbers by rank, and these are converted to estimate equivalent headcount staff numbers using headcount data from FIRE1101[58].

45. Again, assuming the same reading times, the estimated familiarisation cost for firefighters lies in a range of **£0.04 million** to **£0.20 million**, with a central estimate of **£0.10 million**.

Cost of finding eligible residents and conducting PCFRA

46. To conduct a PCFRA, RPs first need to know which residents need one. The estimates for time taken and volume of residents are explained in Table 1 sections 1.6 and 1.7. The calculation is:

Volume of dwellings in in-scope buildings x time to contact (hrs) x RP wage (£/hr)

47. The estimated cost of determining eligible individuals lies in a range of **£0.78 to £2.34 million**, with a central estimate of **£1.56 million**.

48. Once identified, in-scope individuals who require a PCFRA will need to have one conducted. The number of residents who require a PCFRA is calculated using the volume of buildings and dwellings in-scope and applying the disability and time taken estimates outlined in sections 1.10 and 1.7 of Table 1, respectively.

Volume of dwellings with mobility-impaired residents x time to conduct PCFRA (hrs) x RP wage (£/hr)

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52 TAG data book - GOV.UK: https://www.gov.uk/government/publications/tag-data-book
53 Pay settlement 2024 | Fire Brigades Union (fbu.org.uk): https://www.fbu.org.uk/pay-rates/pay-settlement-2024
54 National Minimum Wage and National Living Wage rates - GOV.UK (www.gov.uk): https://www.gov.uk/national-minimum-wage-rates
55 London Living Wage | London City Hall: https://www.london.gov.uk/programmes-strategies/business-and-economy/support-your-business/london-living-wage
56 Based on internal Home Office data on average employer pension contribution between 2019 and 2023.
57 FIRE1102a, Fire statistics data tables - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables
58 FIRE1101; Fire statistics data tables - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

49. The estimated cost of conducting PCFRAs lies in a range of **£1.00 million to £14.5 million**, with a central estimate of **£7.71 million over ten years**.

Information boxes

50. For the output of PCFRAs to be used by an FRS during a fire incident, they must be able to easily access the information. The RPs are required to install secure boxes (if required by FRAs), in which to put the relevant PCFRA information for the FRS to access when needed. The requirement (and cost impact) of high-rise buildings having information boxes is assumed to be covered by the Fire Safety (England) Regulations 2022. The cost of installing information boxes will therefore only apply to medium-rise SE buildings.

51. The estimated cost of installing an information box is discussed in section 1.11 of Table 1.

52. The calculation is as follows:

Number of medium-rise SE buildings (11 to 18m) x cost of box (£)

53. The cost to RPs of installing information boxes is expected to be between **£0.02 million and £0.47 million**, with a central estimate of **£0.21 million**.

54. There is also a time cost to the RP of adding PCFRA information to the information box. Section 1.12 in Table 1 explains the estimates for time taken to install information into the boxes. This cost applies to all buildings, regardless of height, and is calculated as:

Number of dwellings with mobility-impaired residents x RP wage (£/hr) x time to enter information (hrs)

55. The cost to RPs to add the information is estimated to be between **£0.08 million and £2.41 million**, with a central estimate of **£0.96 million**.

Measures resulting from PCFRAs

56. Following a PCFRA, a range of in and out of flat measures may be implemented to cater to the needs of the vulnerable individual. It is likely that the cost of these measures could be passed onto residents under certain conditions. These include, the terms of specific lease, the type of measures implemented, and whether the RPs deem that the measures will benefit multiple residents. Depending on these factors, these costs could be passed on to either specific residents or to all residents in the building. This is considered in the impact to households, Section G, of this IA.

57. Any in and out flat measures costs that will be passed onto residents will be a transfer cost, as although private housing residents will incur a cost, the money will be transferred to the businesses that will be supplying these measures. The cost to private households and money received by businesses will equal out and would not have an impact on economic welfare as this would not make society better or worse off.

58. The exact in-flat measures that will be taken up following a PCFRA are uncertain and will depend on the RP, the individual and the outcome of their PCFRA. To estimate the cost of these measures, a basket of potential measures that could be taken have been estimated and costed. These are detailed in Table 2 below. Prices of these items were

found from major retailers[59], with an average cost being taken. These averages were then summed to estimate the total cost of all potential measures.

[59] A wide range of major retailers considered including Seton, Screwfix, Amazon, and other online sources. The accuracy of these costs was also considered by the NFCC and RP groups.

Table 2, Estimated cost of potential in-flat measures following a PCFRA, £ 2025/26 prices, including 10 per cent optimism bias.

Measures	Low	High	Average	Type
Security Locks/Access systems	112	248	180	Person
Fire blanket	9.94	77.8	43.9	Person
Smoke alarm	6.84	62.1	34.5	Person
Fire safe ashtrays	6.20	58.6	32.4	Person
Flame retardant pillows	7.38	44.0	25.7	Person
Flame retardant duvet	19.8	35.0	27.4	Person
Flame retardant duvet covers	17.3	32.5	24.9	Person
Fire resistant doors	105	576	341	Person
Fire resistant doors - labour costs	49.0	61.2	55.1	Person
Vibrating pillow and connector	113	542	327	Person
Evacuation chair	183	1,740	963	Person
Total cost	**629**	**3,481**	**2,060**	**Person**

Source: Home Office estimates, 2025/26, 3.s.f., totals may not sum due to rounding.

59. Out of flat measures are calculated using the same method as in-flat measures, though with a different bundle of items. From discussion with the FRS and RPs, out of flat measures of this type are not currently a common occurrence following PCFRAs, so assumptions have had to be made on the sort of measures that will be implemented. As with the in-flat measures, major online retailers[60] have been used to inform price assumptions.

[60] Major online retailers like Screwfix and other online fire safety stores considered.

Table 3, Estimated cost of potential out-of-flat measures following a PCFRA, £ 2025/26 prices, including 10 per cent optimism bias.

Measure	Low	High	Average	Type
Emergency signs	2.53	9.02	6.56	Storey
LED exit box	8.75	109	58.9	Storey
Lighting	16.7	259	138	Storey
Grab rail	7.90	401	204	Storey
Ground floor ramp	102	2,740	1,420	Building
Total cost	**137**	**3,520**	**1,830**	**Of all out-flat measures[61]**
Total cost	**84.9**	**1,020**	**1,950**	**Average cost of out of flat measures for a high-rise building**
Total cost	**49.0**	**610**	**1,170**	**Average cost of out of flat measures for a medium rise building**

Source: Home Office estimates, 2025/26, 3.s.f, totals may not sum due to rounding.

60. As not all vulnerable individuals have the same needs, not every 'per person' measure will be taken up for all vulnerable individuals. For the in-flat measures the 'take-up' rate of per person measures is estimated to be in a range of 5 to 50 per cent, with a central estimate of 33 per cent for the private housing sector. Whereas, for the social housing sector the take up rate is assumed to be in a range of 50 to 100 per cent, with a central estimate of 75 per cent (see sections 1.8 and 1.9 in Table 1).

61. The take up rate for out of flat measures is estimated to be in a range of 20 to 80 per cent with a central estimate of 50 per cent.

62. The take up rate of out of flat measures in private and social housing sector is assumed to be the same as the cost of out flat measures are more likely to be spread across all leaseholders in a building, as opposed to the individual, like the cost of in flat measures are.

63. It is assumed that all in-scope buildings will already have some measures in place, such as fire alarms in common areas, ventilation of stairways, and fire-resistant doors. These measures have not been included in the out-of-flat costs to avoid overestimating the costs.

[61] This is the total cost of the bundle of out of flat measures. A take up rate is then applied once the total building costs are estimated by multiplying the per storey costs to the number of stories. It is assumed that a medium rise building will have 4 stories, and a high rise will have 9 stories.

64. These costs are calculated, as follows:

- The cost per in-scope resident (calculated using the take-up rate estimates for in flat measures) for social housing is assumed to lie in a range of £290 to £3,420, with a central estimate of £1,500. For private housing, this cost is assumed to lie in the range of £29 to £1,710, with a central estimate of £651. These figures are then multiplied by the total estimated number of in-scope dwellings with disabled residents.
- The total set up cost of in-flat measures (social and private housing) for all high-rise buildings in year one is assumed to lie in the range of £2.26 million to £683 million, with a central estimate of £152 million. This assumes high-rise buildings have an average of nine storeys.
- The total set up cost of in-flat measures (social and private housing) for all SE medium-rise buildings in year one is assumed to lie in the range of £0.03 to £14.4 million, with a central estimate of £2.68 million. This assumes medium-rise buildings have an average of four storeys.

65. The total cost of in and out-of-flat measures for the **Preferred Option (Option 1)** is estimated to lie in a range of **£3.53 million** to **£806 million**, with a central estimate of **£190 million in year one** (in a range of £7.54 million to £2,330 million, with a central estimate of £478 million over the ten years, PV). These figures include in the labour cost of fitting a fire-resistant door.

Evacuation Plans

66. There will be some evacuation plan costs that fall to RPs and result from the creation of evacuation plans, from providing their local FRS with an electronic copy of the evacuation plan and placing a hard copy in the information box on site where one has been installed. It is likely that some SE buildings may already have evacuation plans completed, and others may have partial plans in place, and so it is important to take into account that the costs presented in this analysis present the maximum expected cost of evacuation plans.

67. The cost to RPs of creating evacuation plans is calculated as:

Volume of high rise and higher risk buildings x time to create plan at that height (hrs) x RP wage (£/hr)

68. The RPs will also need provide their local FRS with an electronic copy of an evacuation plan for their building and to place a hard copy of this plan in the information box on site where one has been installed. This set-up cost is calculated as:

Volume of high rise and higher risk buildings x Admin processing RP wage (£/hr) x time required (hrs)

69. The total set up costs (for high rise and higher risk buildings) for the evacuation plans is estimated to be in a range of £1.37 million to £2.84 million, with a central estimate of £2.10 million in year one only.

70. The ongoing costs for evacuation plans will be incurred when RPs have to annually update or review instructions that they created in the first year over the appraisal period. The ongoing costs will also fall annually to account for the number of buildings with SE strategies falling.

71. It is assumed that the RPs will have to update evacuation plans following major refurbishment work, and annually review all plans to confirm the information within them is correct. It is assumed that four per cent of buildings undertake major refurbishment work each year and so will require a full review of their evacuation plan. These buildings will undertake the same process as outlined in the set-up costs section, with the same assumptions for the completion of building plans and the provision of information to FRSs.

72. In the remaining 96 per cent of buildings, an annual review of their building plans will still be required to check for, and make, any required changes. It is assumed that this review will take approximately 2 to 10 minutes, with a central estimate of 5 minutes and be undertaken by the RP.

73. The total ongoing costs (PV, for both high rise and higher risk buildings) for evacuation plans is estimated to be in a range of £0.47 million to £1.18 million, with a central estimate of £0.78 million.

74. **The total cost of evacuation plans (PV, for both high rise and medium-rise SE buildings) is estimated to be in a range of £1.84 million to £4.02 million, with a central estimate of £2.89 million.**

Total set-up costs

75. The low, central, and high scenarios throughout this IA are calculated as follows:
    a. Low Scenario – Assumes every low assumption materialises simultaneously.
    b. Central Scenario – Assumes every central assumption materialises simultaneously.
    c. High Scenario – Assumes every high assumption materialises simultaneously.

76. The IA does not suggest that the low and high scenarios are a likely outcome, however estimating a “reasonable” best and worst-case scenario is not possible at this stage due to a lack of available evidence. The central scenario is estimated to be the more likely scenario.

77. Total set-up costs are presented in Table 4.

Table 4, Total set-up costs, £ million (2025/26 prices).

	Low	Central	High
Familiarisation- RPs	0.02	0.04	0.08
Familiarisation- Residents in scope	0.16	0.35	0.74
Familiarisation (firefighters)	0.04	0.10	0.20
Cost of finding eligible residents	0.78	1.56	2.34
Conducting PCFRA	1.00	7.71	14.5
Resource cost of information boxes	0.02	0.21	0.47
Put information into information boxes	0.08	0.96	2.41
In and out of flat measure	3.33	186	793
Fitting in fire resistant door (labour cost)	0.19	4.26	12.5
Evacuation Plans	1.37	2.10	2.84
Total set up costs	**7.00**	**203**	**829**

Source: Home Office estimates, 2025/26 prices, 3.s.f., totals may not sum due to rounding

78. The total set up costs are estimated to be **£203 million** (2025/26 prices) in year 1 only (ranging from £7.00 million to £829 million) for both the private and public sector. For the purposes of this IA we have assumed that all set up costs exist in year 1 only. Delivery may stretch beyond this (and the social housing grant assumes that this will be ongoing for five years). Of these, estimated social housing costs **are £126 million** (2025/26 prices) in year 1 only (ranging from £3.74 million to £517 million). Public sector costs are calculated using data on the different tenures of housing in high-rise and SE medium-rise buildings.

Ongoing costs

79. The ongoing costs come from the need to update PCFRAs as individuals move or need revisions to their provision. This is estimated to be approximately 15 to 25 per cent of set-up costs, with a central estimate of 20 per cent (section 1.10 of Table 1). It is also expected that the number of buildings with SE strategies will fall per year. It is assumed that the number of SE buildings falls by 10 per cent annually, until a steady state of 30 per cent of the current stock is reached, as set out in the consultation IA.[62]

80. The only setup cost not included in the ongoing costs is firefighter familiarisation, which is assumed to be a one-off cost, as it is not possible to split by type or tenure of building (social or private) in the same fashion as RP and resident costs.[63]

81. The total estimated ongoing cost from years 2 to 10 are presented in Table 5 below.

[62] Estimates taken from the 2022 EEIS consultation IA; https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1076190/20220512EEIS_IA_Signed.pdf

[63] Assumed the FF familiarisation cost would be the same for private and social housing

Table 5, Total ongoing costs, £ million over appraisal period (PV)

	Low	Central	High
Familiarisation- RPs	0.02	0.05	0.14
Familiarisation- Residents in scope	0.18	0.54	1.41
Cost of finding eligible residents	0.88	2.36	4.42
Conducting PCFRA	1.14	11.7	27.3
Put information into information boxes	0.09	1.46	4.55
In and out of flat measures	3.79	281	1,500
Fitting in fire resistant door (labour cost)	0.22	6.44	23.6
Evacuation Plans	0.47	0.78	1.18
Total ongoing costs	**6.79**	**304**	**1,560**

Source: Home Office estimates, 3.s.f., totals may not sum due to rounding, 2025/26 prices

82. The total ongoing costs are estimated to be **£304 million (PV)** over the appraisal period, (ranging from £6.79 million to £1,560 million). Of these, social housing costs are estimated to be **£190 million (PV)** over the appraisal period (ranging from £3.80 million to £973 million).

Table 6, Total costs, £ million (PV) over 10 years and 2025/26 prices per year.

	Low	Central	High
Set-up	7.00	203	829
Ongoing	6.79	304	1,560
Total	**13.8**	**508**	**2,390**
Of which is public	7.54	316	1,490
Of which is private	6.24	192	900

Source: Home Office, own estimates, 2025/26

83. The total estimated cost is **£508 million (PV)** over the appraisal period (ranging from £13.8 million and £2,390 million).

84. The total costs to the private sector are estimated to be **£192 million (PV)** over the appraisal period (ranging from £6.24 million and £900 million).

Table 7, Total costs excluding evacuation plans for the preferred option, £ million (PV) over 10 years and 2025/26 prices per year.

	Low	Central	High
Set-up	5.63	201	827
Ongoing	6.32	304	1,560
Total	**11.9**	**505**	**2,390**
Of which is public	6.89	315	1,490
Of which is private	5.06	190	897

Source: Home Office, own estimates, 2025/26

85. The total estimated cost is **£505 million (PV)** over the appraisal period (ranging between **£11.9 million** and **£2,390 million**).

86. The total costs to the private sector are estimated to be **£190 million (PV) over the appraisal period** (ranging between £5.06 million and £897 million). It is assumed that costs associated with PCFRAs, information boxes and out-of-flat measures will fall to RPs and building management companies and will subsequently be passed on to leaseholders. The net costs to business are assumed to be minimal.

Non-monetised costs

87. There are some additional potential costs as a result of this policy, which it has not been possible to monetise. These include:

- **Cost of filling out a PCFRA to residents**: It is possible that there may be a cost on residents through the time it takes them to identify themselves to the RP, and then interact with the RP as part of the PCFRA process to explain their requirements. This impact is uncertain, and so has not been monetised in this IA. It is also possible some of the costs borne by the RP will fall to individual residents. This impact is further discussed in section I, Wider Impacts.
- **Wider impact on FRSs**: It is possible that there may be some additional costs on FRSs, however the volume and likelihood of these is uncertain and so has not

been monetised as part of this IA. If the local FRA chooses sharing by electronic means, RPs will then share the information from the PCFRA electronically, instead of placing it in the information box on premises (and would not need to install one unless otherwise required to by law). Where this does occur, it is possible FRSs will incur a time and potential IT cost from processing and receiving this information. There may be an impact on FRS response from the additional availability of emergency evacuation information. From initial discussions with FRSs, it is possible that some may adjust their pre-determined appliance numbers if they know about the existence of residents with a mobility impairment or may have to adjust their response numbers once, they get this information from the information box. This may have a cost on FRSs; however, this is very difficult to quantify and monetise.

- **Labour costs of fitting in and out of flat measures**: Where this is expected to be significant, this has been monetised. However, this has not been done for every measure as for most this is expected to be a relatively small cost that will likely be absorbed within maintenance contracts.

Benefits

88. Apart from the transfer benefits received by businesses as a result of private and social housing buying increased fire safety measures, it has not been possible to monetise any benefits from these proposals due to a lack of comprehensive evidence around the number of fatalities that this legislation will prevent.

89. Numerous potential non-monetised benefits of the options have been identified, which are outlined below.

- **Reduced risk to life:** Implementing this policy will help reduce health and safety risks to all residents in the buildings. RPEEPs will not only aid the safe evacuation of in scope residents but also all residents as measures (such as, in and out flat measures, information boxes, etc) will be put in place as a result of the PCFRAs. Benefits such as a reduction in fatalities and injuries as well as avoided physical and emotional costs are expected to be realised.
- **Reduced Fear of Fire:** A direct positive impact of implementing RPEEPs is the associated wellbeing benefits for residents feeling safe in their homes and having peace of mind.

Breakeven analysis

90. It has not been possible to quantify all of the benefits of the proposals due to the lack of evidence and evaluation around the number of casualties and fatalities this policy will prevent. A breakeven analysis has been completed to allow for comparisons between the options and illustrate the magnitude of benefits required, over and above the monetised benefits, for this policy to have a positive Net Present Social Value (NPSV).

91. To do this, the cost of a fire related fatality is taken from the Economic and Social Cost of Fire data tables.[64] The published Home Office value for the cost of a fire related

[64] Home Office (2023) Economic and Social cost of Fire, M12. Unit cost (Fatality incidents), the 2019/20 cost has been uprated to 2024/25 prices see: https://www.gov.uk/government/publications/economic-and-social-cost-of-fire

fatality is £1,282,339 in 2019/20 prices, this figure is then uprated to £1,622,155, to account for inflation and put into 2025/26 prices, using GDP deflators.

92. Dividing the NPSV of RPEEPs and evacuation plans, **-£29.9 million (PV)** over 10 years, by the value of preventing one fatality per year (£14.0 million, PV over 10 years) indicates that **3 fire related fatalities need to be avoided per year over 10 years (28.4% of the annual average of fire related fatalities in high rise and medium rise dwellings)**. In the low and high NPSV scenarios (-£6.25 million and -£62.6 million PV) 1 and 5 fire related fatalities need to be avoided per year over 10 years, respectively.

93. Similarly, dividing the NPSV of RPEEPs and evacuation plans, -£29.9 million (PV) over 10 years, by the value of preventing one fire related casualty (£7,170 in 2025/26 prices for one year and £61,700, PV over 10 years) indicates that **485 fire related casualties[65] requiring hospital treatment need to be avoided per year over 10 years (313% in proportion to the annual average of fire related casualties in high rise and medium rise dwellings).** In the low and high scenarios 102 and 1,015 fire related casualties requiring hospital treatment need to be avoided per year over 10 years, respectively.

94. Alternatively, to give an indication of what the maximum benefits of this policy could look like, the total number of fire related casualties and fatalities in a year on average were monetised.

95. To do this for fatalities, figures from the fire statistics tables[66] for high-rise and medium-rise fatalities was used. It is assumed that high-rise figures can be used as a proxy for high-rise buildings (18m+) while medium-rise can be used for the medium-rise SE (11 to 18m). To get specific fatality figures for medium-rise SE buildings, the fatalities figure for medium-rise buildings was divided by the ratio of residents with an impairment in medium-rise SE buildings by the total number of medium-rise SE dwellings.

96. An average of ten years of fire related fatalities in high-rise and medium-rise SE buildings was then estimated for a year. The number of fire related fatalities in high-rise and medium-rise SE buildings is estimated to be 10.6, this figure is then multiplied by the cost of a fire related fatality of £1,620,000[67] (2025/26), giving a total cost of £17,100,000 for all in scope fire related fatalities.

97. Similarly, for casualties, using the same methodology as fatalities, the number of fire related casualties in high-rise and medium-rise SE buildings is estimated to be 154.8. This figure is then multiplied by the cost of a fire related casualty of £7,170[68] (2025/26) to give us a total cost of £1,110,000 for all in scope fire related casualties.

98. As a result of RPEEPs if all applicable casualties and fatalities were avoided a total cost of £18,200,000 would be saved in a year. This is estimated to be £157,000,000 over the ten-year appraisal period (PV). Therefore, on the basis of this analysis, the

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65 Home Office (2023) Economic and Social cost of Fire, M9. Unit cost (Injury incidents), the 2019/20 cost has been uprated to 2024/25 prices. See: https://www.gov.uk/government/publications/economic-and-social-cost-of-fire

66 Table 0205, Fire statistics data tables - GOV.UK (www.gov.uk): https://www.gov.uk/government/statistical-data-sets/fire-statistics-data-tables

67 Home Office (2023) Economic and Social cost of Fire, M12. Unit cost (Fatality incidents), the 2019/20 cost has been uprated to 2024/25 prices see: https://www.gov.uk/government/publications/economic-and-social-cost-of-fire

68 Home Office (2023) Economic and Social cost of Fire, M12. Unit cost (Fatality incidents), the 2019/20 cost has been uprated to 2024/25 prices see: https://www.gov.uk/government/publications/economic-and-social-cost-of-fire

value for money case cannot be made on the monetisable value of preventing fatalities and casualties alone.

99. The NPSV, BNPV (business NPV) and annual net cost to business (defined as EANDCB) of this policy are presented in Table 8.

Table 8, Summary of monetised benefits and costs, NPSV, BNPV, EANDCB, £ million (PV).

£ million (10-year PV)	Low	Central	High
Total benefits	7.54	478	2,330
Total set-up cost	**7.00**	**203**	**829**
Total ongoing cost	**6.79**	**304**	**1,560**
Total cost	**13.8**	**508**	**2,390**
Of which transfer costs	*7.54*	*478*	*2,330*
NPSV	**-6.25**	**-29.9**	**-62.6**
Of which, public	-2.25	-13.6	-29.3
BNPV	**7.54**	**478**	**2,330**
EANDCB	**-0.88**	**-55.5**	**-270**

Source: Home Office own estimates, 3.s.f., figures may not sum due to rounding.

100. The set-up cost is estimated to be **£203 million** (2025/26 prices) in year 1 only (ranging from £7.00 million to £829 million). The ongoing costs are estimated to **be £304 million (PV)** over 10 years (ranging from £6.79 million to £1,560 million) The total cost is estimated to be **£508 million (PV)** over ten years (ranging from £13.8 million to £2,390 million).

101. Benefits are estimated to be **£478 million (PV)** over 10 years (ranging from £7.54 million to £2,330 million). The Net Present Social Value (NPSV) is estimated to be **-£29.9 million (PV)** (ranging from -£6.25 million to -£62.6 million).

102. The Business Net Present Value (BNPV) is estimated to be **£478 million (PV)** over 10 years (ranging from £7.54 million to £2,330 million). The net cost to business per year expressed as the (EANDCB[69]) is **-£55.5 million.** In the high scenario the EANDCB is -£270 million per year, and in the low scenario it is -£0.88 million per year**.**

[69] Defined as the Equivalent Annual Net Direct Cost to Business. This is calculated by dividing the total undiscounted cost to business over the 10-year appraisal period, by the annuity rate.

Table 9, Summary of monetised benefits and costs, NPSV, BNPV, EANDCB, £ million (PV), not including evacuation plans

£ million (10-year PV)	Low	Central	High
Total benefits	7.54	478	2,330
Total set-up cost	**5.63**	**201**	**827**
Total ongoing cost	**6.32**	**304**	**1,560**
Total cost	**11.9**	**505**	**2390**
Of which transfer costs	7.54	478	2,330
NPSV	**-4.41**	**-27.0**	**-58.6**
Of which, public	-1.60	-12.6	-27.9
BNPV	**7.54**	**478**	**2,330**
EANDCB	**-0.88**	**-55.5**	**-270**

Source: Home Office, own estimates, 3.s.f, Totals may not sum due to rounding.

Total Costs, Benefits, NPSV, BNPV and EANDCB

103. The set-up cost is estimated to be **£201 million** (2025/26 prices) in year 1 only (ranging from £5.63 million to £827 million). The ongoing costs are estimated to be **£304 million (PV)** over 10 years (ranging from £6.32 million to £1,560 million). The total cost is estimated to be **£505 million (PV)** over 10 years (ranging from £11.9 million to £2,390 million).

104. Benefits are estimated to be **£478 million (PV)** over 10 years (ranging from £7.54 million to £2,330 million). The Net Present Social Value (NPSV) is estimated to be **-£27.0 million (PV)** over 10 years (ranging from -£4.41 million to -£58.6 million).

Value for money

105. For a policy to be considered value for money (VfM), it must meet its strategic and policy objectives.

106. **The preferred option** (1) meets the objectives of reducing the impact of fires and improving evacuations for those unable to evacuate themselves. However, analysis suggests that implementing RPEEPs in this way will mean a large negative NPSV due to the scale and reach of the policy. Costs accrue to housing providers, private housing residents and FRSs and benefits mainly accrue to residents, FRSs and businesses providing the measures. However, RPs may indirectly benefit (through increased tenant satisfaction and improved reputation) if residents feel safer in the in-scope buildings because of this policy.

107. It has not been possible to monetise benefits, so it is not possible to accurately reflect the overall value for money of each option in the Net Present Social Value (NPSV). Breakeven analysis has been conducted to understand the point at which RPEEPs becomes value for money for impacts that we are able to monetise but not quantify.

Place-based analysis

108. This measure does not have any specific spatial objectives; however, the impact will be greater in urban areas (cities) compared to rural because urban areas have a higher

number of high-rise residential buildings, and likely a higher number of medium-rise SE buildings. This disproportionate impact is inevitable for interventions of this type which target buildings of a certain height. London contains approximately 61 per cent of all high-rise residential buildings, the highest concentration of any region[70], and also likely contains a similar proportion of all medium-rise SE buildings.

109. It is likely that these options will have a disproportionate impact on London compared to the rest of England. Other areas such as the South East (10 per cent of all high-rise residential buildings), the North West (7 per cent) and West Midlands (6 per cent) have a larger amount of high-rise residential buildings and so will also likely have a greater associated cost than other areas. Some areas have very few high-rise buildings, and it is expected that some FRSs may have no medium-rise SE buildings.

110. However, urban areas will also disproportionately incur the benefits of the proposals. The aim of the policy is to improve the evacuation of individuals unable to evacuate themselves, which could lead to an increase in social welfare.

Impact on small and micro-businesses

111. Business costs will be incurred by those who act as RPs, such as residential managing agent firms, residential management companies, right to manage companies or landlords. These businesses are varied, and there is limited available data on the residential block property management sector, especially when specifically looking at high-rise multi-occupied residential buildings and buildings with SE strategies in place.

112. It is estimated that private sector buildings over 18m in height contain solely leasehold dwellings.[71] This IA assumes that this is the same in medium-rise SE buildings. It is expected that many leasehold dwellings will be managed by a residential managing agent firm, who act as the RP.

113. The Association of Residential Managing Agents (ARMA) undertook analysis of their members[72] and found that "*the managing agent industry is dominated in terms of number of firms by smaller businesses*." It is likely that most residential managing firms have between 10 to 49 employees, as on average a residential managing agent firm employs 29 individuals. These would be defined as small businesses.[73]

114. Over 80 per cent of ARMA member firms manage fewer than 4,000 units, and so would likely be small businesses. Only the top ten firms in the industry are very large, managing 500,000 units between them. This data is only available for all ARMA members, who manage leasehold dwellings of all heights and is considered the best available proxy for the industry at this stage as it is not possible to adjust these figures

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70 Building Safety Data Release, England: September 2023 (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/media/652fddef92895c000ddcb9bb/Building_Safety_Data_Release_September_2023.pdf

71 Building Safety Data Release, England: September 2023 (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/media/652fddef92895c000ddcb9bb/Building_Safety_Data_Release_September_2023.pdf

72 ARMA: Page 4-5 https://arma.org.uk/downloader/tx7/ARMA_Overview_of_Block_Management_Sector.pdf. Note that ARMA covers England and Wales, whereas this legislation only covers England.

73 RPC Guidance: Page 2 RPC SaMBA - August 2019.pdf - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827960/RPC_Small_and_Micro_Business_Assessment__SaMBA___August_2019.pdf

to only account for businesses which manage high-rise multi-occupied buildings, or medium-rise SE buildings.

115. It is acknowledged that not all managing agents in ARMA will manage high-rise or SE buildings, and so the proportion of small and micro-businesses managing these buildings may be different. There is limited evidence on the size of other businesses that may act as RPs, however by nature, right to manage and residential management companies are likely to be small or micro-businesses. There is not enough accurate data to estimate the proportion or volume of overall cost that would fall to small and micro-businesses.

116. Many impacted buildings may be managed by small or micro businesses. The preferred option is necessary for improving evacuation for individuals unable to evacuate themselves. It is not possible to grant small and micro businesses an exemption from these measures while still achieving the policy and strategic objectives. Any exemptions for small and micro-businesses could compromise fire safety in high-rise and medium-rise SE buildings and could potentially create loopholes in any potential legislation.

117. Business RPs already work in a highly regulated industry and are subject to fire safety regulations, and any properties owned are already subject to the FSO 2005. These proposals build on this legislation, and many businesses will already be taking steps to make sure fire and building safety measures are up-to-date and comply with the latest regulation and best practice guidance.

118. As the majority of the additional costs are expected to either be covered by housing providers or passed on to private leaseholders where they are able to, there is unlikely to be a large and disproportionate impact on small and micro businesses. More information on this is covered in the Risks and Assumptions Section M below.

F. Costs and benefits to business calculations

Table 10: Costs to business, £ million (PV) over 10 years, 2025/26

	Low	Central	High
Total Benefits	7.54	478	2,330
Total set-up cost	0.00	0.00	0.00
Total ongoing cost	0.00	0.00	0.00
Total cost to business	0.00	0.00	0.00
BNPV	**7.54**	**478**	**2,330**
EANDCB	**-0.88**	**-55.5**	**-270**

Source: Home Office, own estimates. 3.s.f.

119. The implementation of RPEEPs will create benefits for all businesses that sell or install the range of in and out of flat measures that RPs will be required to implement based on the results of the PCFRA, or who are able to deliver the relevant adjustments. There is potential for businesses to increase the prices of these goods in response to the increase in demand for these measures. Larger businesses may be in a better position to take advantage of this. Smaller businesses may face difficulties in scaling up at short notice.

G. Costs and benefits to households' calculations

Leaseholder/household impacts

120. It has been assumed in this IA that the majority of costs will fall on RPs. It is likely that, where possible any financial burdens on RPs will then be passed onto leaseholders, which in this case would be households. The exact amount of this cost will depend on exact terms specified in leases and contracts; however, it is likely that leaseholders will be impacted to some extent by these proposals. If adjustments are made to the common parts for the benefit of the majority of leaseholders, there would, for example, be some cost to the service charge fund.

121. The costs in this IA include both economic and financial cost. It is likely that only additional financial burdens on RPs would be passed onto leaseholders[74], however it is difficult to split these costs out per building. It is acknowledged that there will be differing costs per building. Costs in a building which, for example, had few residents with mobility impairments and evacuation plans in place would be lower for residents compared to a building with more residents with an impairment or disability. The costs presented in this section estimate the potential impacts on leaseholders and are the average cost across all buildings.

122. Businesses supplying these measures could increase their prices to achieve a profit as there will be inelastic demand for these measures.

123. It is possible to see some distributional and regional impacts of passing on these costs to leaseholders/households. Low-income households including older residents and those on a fixed income could be disproportionately impacted as they may need to spend a greater share of their income on any in-flat adjustments if they are not social renters. Urban areas (such as cities like London) could see affordability worsen if significant costs are passed on, increasing financial stress for existing residents.

124. To quantify the costs on private leaseholders it has been assumed in this IA that all costs will be passed on, so this is the maximum expected impact on leaseholders. To calculate the impact on individual leaseholders, the number of dwellings in these buildings have been used as the best available proxies.

125. MHCLG[75] estimate that there are approximately 1,630,000 dwellings in buildings 11 to 18m in height, and 691,000 in buildings that are 18m or more. Assuming that all private high-rise flats are leasehold, then all 446,000 of the private dwellings over 18m are private leasehold, and 6978 of the SE medium-rise dwellings are private leasehold. To estimate a more accurate figure, a narrower scope has been used whereby for all private high-rise and medium-rise buildings the number of dwellings with residents with an impairment have been identified. This was estimated by multiplying the proportion of dwellings that are evacuation impaired[76] by the number of private dwellings.

126. The costs per leasehold dwelling are calculated by doing total private costs divided by number of evacuation impaired dwellings and are presented in Table 11. It is important to note that these estimates are only indicative to get a scale of potential costs as they

[74] Economic costs may already be covered in existing service charge agreements.

[75] Pages 10 to 13, Building Safety Data Release, England: September 2023 (publishing.service.gov.uk): https://assets.publishing.service.gov.uk/media/652fddef92895c000ddcb9bb/Building_Safety_Data_Release_September_2023.pdf

[76] Where 2.7 per cent for the low, 16.4 per cent for central and 30.1 per cent for high were multiplied by 469,420 private dwellings.

do not account for the movement of residents in and out of dwellings over the 10-year period (which would reduce the average burden incurred).

Table 11: Costs of all private high-rise (18m+) and SE medium-rise (11 to 18 metres) by evacuation impaired dwellings, £ and £ million (PV), 2025/26

	Private total costs PV (£m)	PV (over 10 years) cost per private dwelling (£)	EANDCH (£m)
Low	**6.24**	**515**	**0.8**
Central	**192**	**2,580**	**24.7**
High	**900**	**6,580**	**117**

Source: Home Office estimates

H. Business environment

127. It is assumed that private RPs will likely pass the majority of costs on to leaseholders and the cost to social RPs will be fall on housing providers. There should be no significant change to their operating costs or business environment.

128. However, it is possible that the higher rent/maintenance fee might make renting/selling the dwelling more difficult.

129. Businesses that produce and/or supply fire safety products are expected to see an increase in demand as a large number of residents take up fire safety measures based on the outcome of their PCFRA.

I. Trade implications

130. There are companies producing fire safety products in various countries, including England. There is likely to be some trade implications as a result of RPEEPs, however it is difficult to monetise the extent of this impact due to uncertainty in the amount of money that could leave the UK economy. Therefore, this IA assumes that the cost of all measures will be received by UK businesses and stay within the UK economy.

J. Environment: Natural capital impact and decarbonisation

131. It is expected that dwellings will end up with an increased number of in and out of flat fire safety measures due to an increase in the number of PCFRAs conducted. This could lead to either fewer fires or earlier response, and less burn time.

132. A reduction in the number of fire break outs could directly lead to environmental cost savings as a result of a reduction in the release of CO_2 emissions to the environment. However, this is expected to be a relatively minor effect of the policy overall.

133. It is difficult to estimate these cost savings due to the absence of data available and lack of evaluation on the impact of these measures.

K. Other wider impacts

134. Due to the increase in demand for the goods in scope of the RPEEPs legislation, business supplying these goods could experience growth. This has not been monetised at this stage as the extent of this effect is unknown.

L. Growth Impact

135. Implementing RPEEPs will lead to out of flat safety measures becoming mandatory and in flat measures being recommended in all high rise and medium rise SE buildings. This policy could boost economic growth for a certain sector through different avenues including:

136. **Increased demand for goods and services from businesses.** Implementing RPEEPs is likely to lead to an increase in demand for the fire safety measures that are to be provided to residents. Businesses that produce or provide these goods and services will benefit from the increase in demand through an increase in revenue. If the scale of this effect is significant, there could be a creation of jobs within the sector to enable businesses to meet the additional demand.

137. **Reduction in fire related costs.** This policy aims to aid in the evacuation of residents in the event of a fire. Some of the measures that will be implemented as a result of this (e.g. better fire doors or in-flat equipment to counter fire risks) could also lead to a reduction in the number of fire breakouts as buildings become safer. This could reduce the number of casualties and fatalities that occur. Fewer fires mean lower costs for emergency services, fewer insurance claims and less property damage, ultimately reducing the financial burden on households, businesses, and the government in the long run.

138. On the other hand, this policy could lead to negative economic growth for other groups in society through:

- **Higher costs for businesses and households.** Some businesses (specifically residential managing agent firms, who acts as an RP), and households would face higher costs for installing and maintaining fire safety measures. Which could lead to increases in rent or property prices.
- **Impact on disposable income.** It is assumed that RPs within the private housing sector will pass on the costs of implementing any measures onto leaseholders which could reduce their disposable income for other spending, potentially slowing down consumer spending for those affected. However, this is unlikely to lead to a negative impact on the economy's GDP overall as the money would still be spent, just in another area of the economy.

M. Risks and assumptions

Proportion of individuals eligible for a PCFRA in medium rise versus high-rise dwellings

139. The exact proportion of individuals in who will be eligible for a PCFRA is uncertain. In this IA separate ranges are calculated for social and private residents. This builds on the previous assumption used in the EEIS+ consultation IA which assumed the same rate irrespective of tenure. However, there is no available data to suggest whether the figures will be higher or lower in high-rise residential buildings as opposed to medium rise buildings. These estimates also do not account for individuals who may be vulnerable in the short-term[77] and are entitled to a PCFRA.

Number of buildings with in/out of flat measures already in place

[77] Lasting less than a year

140. There is uncertainty around the number of buildings that will already have in or out of flat measures. This IA assumes that not all in-scope residents will obtain the in flat items. A large three-point range for the take up rate has been estimated to account for this uncertainty. Certain out of flat measures, such as fire alarms in certain areas, external fire-resistant doors, etc. have not been included as it is assumed that most buildings will already have the basic out of flat fire measures installed.

Rate at which medium-rise buildings with SE strategies in place move to stay put

141. It is assumed, as per the previous EEIS+ consultation IA, that the number of medium-rise SE buildings will fall over time as steps are taken to improve the safety of these buildings. The assumption is that the number of medium-rise SE buildings will decrease by 10 per cent of the year 1 total each year, until reaching a steady state at 30 per cent of the current total. This is to reflect buildings that are inherently SE due to their age or listing, for example.

142. However, the speed at which this will happen is uncertain. To reflect this, sensitivity analysis has been conducted at the 5 per cent, 15 per cent, and 20 per cent levels until the steady state number of medium-rise SE buildings is reached. This is a purely indicative assumption made for the purposes of this IA.

Table 10, Sensitivity analysis on the proportion (%) of buildings moving from medium-rise SE to stay put per year (NPSV over 10 years, £million, preferred option).

Yearly change from SE to stay put (% of initial total)	5	**10**	15	20
Total cost £million (PV)	-509	-508	-507	-506
of which transfer costs/benefits £million (PV)	-479	-478	-477	-476
NPSV	-29.9	-29.9	-29.9	-29.8

Source: Home Office, own estimates. **Central estimates (10 per cent)** and assumptions used. Figures still based on a minimum 30 per cent steady state being reached. The 30 per cent steady state is reached in year 5 for 15 and 20 per cent yearly decreases and is not reached at all assuming a 5 per cent yearly decrease (at year 10, 55 per cent of current stock is reached).

143. The majority of in-scope buildings are high-rise, meaning the impact of a change in the number of medium-rise SE buildings on the overall NPSV is relatively small, as can be seen in Table 10.

Take up of evacuation chairs and fire-resistant doors specifically

144. Evacuation chairs and fire-resistant doors have been included in the package of measures that could be available to residents. Evidence around how likely residents are to take up these measures in an unfunded scenario is limited. Whilst the range in the take up rate attempts to account for this, there is a chance that the take up of these two measures in particular is overestimated, resulting in an overestimation of the costs in the central scenario.

Lack of benefits monetisation

145. There is little evidence to inform the monetisation of all benefits associated with the proposed options due to the difficulties in estimating the number of casualties and fatalities RPEEPs will prevent. This risks the underestimation of the benefits the policy

could deliver. Instead, breakeven analysis has been conducted to identify the point at which RPEEPs achieves value for money.

Aging population

146. The ONS National Population Projections states that "over the next 15 years the size of the UK population aged 85 years and over is projected to increase from 1.6 million to 2.6 million".[78] It is likely that as the aging population increases, so will the number of individuals with an impaired ability to evacuate. This has not been estimated in this IA. The costs are likely to become higher than estimated in the future as the number of residents in scope of this policy increases.

Increased prices of goods as a result of inelastic demand

147. It is possible that implementing RPEEPs could lead to an increase in prices of in and out flat measures as a result of the sudden surge in demand. As some of these safety measures become mandatory the demand for these goods could increase over the supply, especially in the short-term. As RPs will have to source these goods to comply with the regulation, the demand will become more inelastic in response to any price increases. Suppliers may struggle to scale production quickly which could further exacerbate price increases. This has not been monetised at this stage. However, industry prices ranging from low to high were considered when estimating a 'central' price for each good.

Uncertainty around domestic versus international suppliers of measures and their impact on trade

148. This analysis assumes that the cost of in and out of flat measures is transferred to domestic businesses and stays within the UK economy. The cost of in and out of flat measures is therefore treated as a transfer and is not considered in the overall NPSV. However, there is a chance that UK businesses will procure the measures from international companies, meaning that a portion of the benefits will leave the UK economy risking an overestimation of the total benefits. The extent to which this will occur is unknown so it is assumed, for the purposes of this IA, that the benefits will remain in the UK.

Wide range in costs across low/central/high scenarios

149. A significant risk of the analysis is the wide range in the estimated total costs of RPEEPs. This is a result of a large range in the potential cost of measures and low levels of certainty around take-up rates. Extreme scenarios have therefore been modelled for analytical completeness. These extremes represent the absolute best and worst-case scenarios, and it is important to note that the IA does not suggest that these scenarios are a likely outcome, however estimating a "reasonable" best and worst-case scenario is not possible at this stage due to a lack of available evidence. These scenarios are explained in greater detail in the sensitivity section.

[78] National population projections - Office for National Statistics: https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2021basedinterim

Annex

Mandatory specific impact test - Statutory Equalities Duties	Complete
Statutory Equalities Duties The public sector equality duty requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations in the course of developing policies and delivering services. [Equality Duty Toolkit] MHCLG believe that the Residential PEEPs package proposals represents a deliverable, safe, and proportionate way to improve fire safety for individuals who are unable to self-evacuate, benefiting those with the protected characteristics of disability, age (in relation to the elderly), pregnancy/maternity (in relation to a temporary impairment of mobility), females and race (given those from a BAME background have a greater representation in 18m+ buildings than elsewhere) with no impacts on those with other protected characteristics drawn to our attention. The overall net impact on these groups is moderately positive to positive. Additionally, to help protect these individuals in the interim i.e. until the Residential PEEPs proposals have been implemented, Responsible Persons have been reminded of their existing duties under the Fire Safety Order and a range of interventions have been put in place to increase fire safety of affected residents e.g. Fire Safety (England) Regulations 2022. **The SRO has agreed these summary findings.**	**Yes**