

MILTON KEYNES LOST

How paradisiacal second staircase regulation erased a city the
size of Milton Keynes

Place Base, February 2026



PLACE BASE

Executive Summary

This report examines the profound implications of the UK government's July 2023 decision to mandate second staircases in all new residential buildings over 18 metres in height. While presented as a life safety measure, the analysis reveals that the policy has an exceptionally weak safety case, creates significant market confusion, and will severely constrain the delivery of new homes, particularly in urban areas where density is most needed.

The decision to set the threshold at 18 metres was a substantial departure from the original consultation, which proposed 30 metres—a well-established trigger for enhanced fire safety measures. The government's Impact Assessment provides very limited safety justification for this lower trigger. It models that, for buildings between 18-30 metres, the rule might avert 0.00016 fatalities per major fire incident—equating to one avoided death every 6,153 years. The overwhelming majority of modelled benefits are instead found in buildings over 50 metres in height.

The Government admits that the 18-metre threshold was chosen primarily for administrative alignment with the definition of a 'High-Risk Building', not on compelling safety evidence. This rationale is further weakened by the ongoing review of the definition of such buildings, which is likely, over time, to move towards a more nuanced, risk-based assessment. The policy has created a contradictory public narrative: while new buildings above 18m are deemed unsafe without a second staircase, thousands of existing single-staircase buildings at the same height are declared safe, provided they are well-maintained.

The primary consequence of this policy is a substantial reduction in the viability and delivery of new homes. The government's Impact Assessment calculated a Benefit Cost Ratio of 0.007, with costs estimated at £1.2bn against benefits of just £800k, acknowledging negative effects on development viability and housing supply.

Extensive industry research conducted for this report, involving 23 semi-structured interviews with senior stakeholders from fire engineers, housing associations, homebuilders, fire safety advisors, architects, and building consultants, confirms a severe market disruption. The consensus is that a 'viability chasm' has been created for buildings between approximately 18 and 30 metres. The additional cost and design complexity of a second staircase, combined with heightened regulatory scrutiny that comes with being a High Risk Building, make mid-rise developments in this window financially unworkable.

The industry response is not to build smaller homes within these schemes, as the government assumed, but to avoid the requirement altogether. The dominant trend is to redesign schemes to stay under the 18-metre threshold, significantly reducing building height and the number of homes. Based on detailed feedback, this report estimates that the number of homes delivered in planned buildings over 18 metres will be reduced by 25 per cent.



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¹ Tall building in construction, photo by Jamie Ratcliff.

Applying this 25 per cent reduction to projected delivery is modelled to result in the loss of approximately 17,960 homes per year across England. Over a five-year parliament, this equates to almost 90,000 homes, equivalent to a city the size of Milton Keynes. London and other major urban areas, where density targets make mid-rise development essential, will be disproportionately affected.

These are not merely unbuilt homes. If housing targets are to be met, this loss will inevitably push development onto less sustainable greenfield sites, increasing car dependency and reducing access to jobs, services, and vital social networks. In the meantime more people will be living in existing homes which lack the fire safety provisions – including sprinklers, vented stairwells and extensive compartmentation – of new homes.

The UK's move to a more restrictive standard contrasts with a growing international trend, particularly in North America, to reform building codes and permit single-staircase construction in mid-rise buildings to boost the supply of safe, modern housing. Evidence from cities like New York and Seattle indicates no link between single staircases and fire fatalities in modern, sprinkler-protected buildings of four-to-six storeys.

The current policy is untenable. It imposes high costs for at best minuscule safety benefits while actively sabotaging housing delivery. The government must rectify this.

The Government should use the ongoing risk-based review of the High-Risk Building definition to raise the mandatory second staircase threshold to 50 metres.

This aligns with the government's own data, which shows the material safety benefits are concentrated in buildings over 50 metres. It would bring the UK into line with nations like France and Finland, maintain a safety-focused approach for genuinely high-rise structures, and immediately restore the viability of thousands of urgently needed mid-rise urban homes. This change is essential to reconcile the rhetoric of "Build, baby, build!" with the reality of delivering sustainable, safe, and sufficient housing.

The second staircase requirement

On 24 July 2023 the then Housing Secretary Michael Gove, announced that second staircases would be required on all new residential buildings above 18 metres in height. This was a shock departure from the Government consultation which had proposed requiring second staircases in new buildings over 30 metres in height².

There was a rationale for the proposed height threshold. Thirty metres is an accepted threshold for increased safety measures such as increased fire resistance provisions and marks a recognised trigger representing an increase in the level of risks in buildings overall.

The consultation also noted that some other jurisdictions have height triggers beyond which a single staircase is not permitted in residential buildings, ranging from 18m to 75m in height. It did not note the changes to building codes, mainly happening in North America and explored below in the section of this report entitled 'International Context' where previous second staircase rules are being abolished to enable increased numbers of new, high quality and fire safe homes to be built.

THE SAFETY CASE

The changes have been applied paradoxically to save lives in new buildings, which have much higher fire safety requirements in passive and active fire protection through modern building regulations, whilst simultaneously the government maintains that there is no life safety risk in existing buildings which lack a second staircase. There are estimated to be 3,375 existing residential buildings over 18 metres in height with a single staircase. The original consultation noted:

There is no evidence that suggest that existing buildings with a single stair above the proposed threshold pose a life safety risk.

This point was expanded upon in a Written Ministerial Statement by Michael Gove on 23 October 2025³, in which he announced a transitional period of 30 months to allow new building regulations applications to confirm to the guidance as it existed on that day, following the publication of the revised building regulations.

²Consultation outcome on Sprinklers in care homes, removal of national classes, and staircases in residential buildings, UK Government (2024), <https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings#staircases-in-residential-buildings>, accessed 15 December 2025.

³Building Safety Update, Written Ministerial Statement laid before the Housing of Commons by Michael Gove MP, 24 October 2024, <https://questions-statements.parliament.uk/written-statements/detail/2023-10-24/hcws1090>, access 15 December 2025

This transitional period ends on 30 September 2026. The statement included a passage stating:

I want to be absolutely clear that existing and upcoming single-staircase buildings are not inherently unsafe. They will not later need to have a second staircase added, when built in accordance with relevant standards, well-maintained and properly managed. I expect lenders, managing agents, insurers, and others to behave accordingly, and not to impose onerous additional requirements, hurdles or criteria on single-staircase buildings in lending, pricing, management or any other respect.

The Government's Impact Assessment of the policy change⁴ provides precise numbers to back this up. It models, under a central scenario that 0.004 fatalities would be avoided in major incidents of fire in 18-30 metre buildings, which it models as having a one in 50,000 probability for any given building in a given year.

The table below, taken from the Impact Assessment, is clear that the risks of having a single staircase are much higher once a building is above 50 metres in height.

	No. residents that avoid becoming trapped	Avoided fatalities	Avoided major injuries	Avoided minor injuries
18-30m	0.4	0.004	0.011	0.025
30-50m	0.4	0.006	0.016	0.038
50m+	1083	10.83	29.23	68.20

Source: Table 30 from government Impact Assessment, "Number of avoided fatalities/injuries per building (individual incident) – major incident – central scenario".

⁴ *Impact Assessment on the introduction of Second Staircases in residential buildings above 18m, following the Consultation on sprinklers in Care Homes, removal of national classes, and staircases in residential buildings*, Department for Levelling Up, Housing and Communities (2024) https://assets.publishing.service.gov.uk/media/6605c8cd91a320b20282b085/Annex_C_-_Impact_Assessment.pdf, accessed 15 December 2025

The Impact Assessment looks at a 70 year period. The below table has been created using the numbers in the Impact Assessment for new buildings assumed for each height, the probability of a major fire in each of them and then over the 70 year period the number of deaths avoided by the policy of second staircases. Looking just at buildings 18-30 metres in height the policy avoids 0.00016 deaths per year, or one death every 6,153 years.

Building height	Average number of buildings in total over 70 year period	Total expected major fires over 70 years	Total number of avoided deaths per year	Years per death
18-30m	2,031	2.84	0.00016	6,153
30-50m	1,025	1.44	0.00012	8,130
Combined	3,057	4.28	0.00029	3,502

Source: Analysis derived from tables 5 and 30 from government Impact Assessment and central probability of one major fire per building per year having a 1 in 50,000 chance.

The impact assessment also considers injuries arising from catastrophic fires. As per the table below the Impact Assessment models that 4.62 fatalities would be avoided in a catastrophic fire in a building 18-30 metres in height. These are assumed to have a probability of 1 in a million for a given building in a given year.

	No. residents in building	Avoided fatalities	Avoided major injuries	Avoided minor injuries
18-30m	92	4.62	13.87	18.49
30-50m	216	10.78	32.33	43.10
50m+	616	30.78	92.34	123.12

Source: Table 39 from government Impact Assessment, "Number of avoided fatalities/injuries per building – catastrophic incident – central scenario".

The Impact Assessment looks at a 70 year period. The below table has been created using the numbers in the Impact Assessment for new buildings assumed for each height, the probability of a catastrophic fire in each of them and then over the 70 year period the number of deaths avoided by the policy of second staircases. Looking just at buildings 18-30 metres in height the policy avoids 0.01 deaths per year, or one death every 107 years.

Building height	Average number of buildings in total over 70 year period	Total expected catastrophic fires over 70 years	Total number of avoided deaths per year	Years per death
18-30m	2031	0.14	0.01	107
30-50m	1025	0.07	0.01	90
Combined	3057	0.21	0.02	49

Source: Analysis derived from tables 5 and 31 from government Impact Assessment and central probability of one catastrophic fire per building per year having a 1 in 1,000,000 chance.

The Impact Assessment models the cost of moving the threshold for requiring second staircases to 18 metres at £1.2bn, compared to £800k of benefits – a Benefit Cost Ratio of 0.007. It somehow assumed that these additional costs would be borne without problem by developers of these buildings.

Some readers may think these statistically small benefits are a price worth paying to avoid tragedies but they contrast starkly with safety improvements that will be derived from the installation of sprinklers since the Grenfell tragedy. A 2019 study⁵ found that deaths in sprinklered buildings that experienced fires were almost five times less likely than non-sprinklered buildings, that “you are only half as likely to be injured when sprinklers are present in a dwelling fire” and that you are 22% less likely to require hospital treatment if you are in a fire which is controlled by a sprinkler system. Sprinklers are a real safety protection and are now required in all new residential buildings over 11 metres in height. This will save lives.

Ultimately the justification for requiring second staircases is not safety, it is administration. The safety case was not relied upon by government in choosing 18 metres as the threshold for a second staircase. They said this threshold was chosen “on the basis that it provides alignment with the High-Risk Building threshold”⁶. This is a poor justification. Whilst the initial review of the definition by the Building Safety Regulator recommended no immediate change, it concluded that there was a need for “an ongoing risk-based review of the definition”⁷. In time this is likely to result in a definition that is not solely based on height and will include consideration of occupancy and other risks.

⁵ Efficiency and Effectiveness of Sprinkler Systems in the United Kingdom: An Analysis from Fire Service Data, a joint report by the National Fire Sprinkler Network and the National Fire Chiefs Council, (2019), <https://www.southwales-fire.gov.uk/app/uploads/2019/09/Efficiency-and-Effectiveness-of-Sprinkler-Systems-in-the-United-Kingdom-Supplementary-Report.pdf> , accessed on 12 December 2025

⁶ Consultation response - Amendments to Approved Document B: Second Staircases, UK Government (2024), <https://www.gov.uk/government/consultations/sprinklers-in-care-homes-removal-of-national-classes-and-staircases-in-residential-buildings/outcome/consultation-response-amendments-to-approved-document-b-second-staircases#government-response> , accessed 15 December 2025

⁷ Definition of higher-risk buildings: initial review and plans for ongoing review, UK Government (2025), <https://www.gov.uk/government/publications/review-of-the-definition-of-higher-risk-buildings/definition-of-higher-risk-buildings-initial-review-and-plans-for-ongoing-review> , accessed 22 December 2025

Impact on housing supply

The Impact Assessment notes that revenues would be decreased on housing developments through lower saleable floorspace and that this would impact on viability. The reduction in viability was assumed to have an impact on housing supply, which is not published in the Impact Assessment. This was thought to occur through three different “channels”. Firstly through entire developments that were rendered unviable and wouldn’t be built at all. Secondly, through developments where reduced viability plays through into reduced affordable housing contributions. Thirdly, on developments that are built out but the regulations result in less housing space provided. Curiously the impact assessment expects this to manifest in smaller homes and not fewer homes “because we expect developers are more likely to reduce the size rather than number of homes”.

This is curious as the most likely response to any additional regulatory burden must be to try to avoid it. If reducing the height, and thus number of homes in a given building, avoids the additional requirement then it must be the most likely real world response. This is supported by interviews with a wide range of senior stakeholders involved in housing development (see the next section of this report entitled ‘Impact on construction and development’).

In fact the real world estimates on supply are estimated to involve the net loss of a quarter of all the homes which would have been delivered in buildings over 18 metres. The erasure of a city the size of Milton Keynes.

Impact on construction and development

In 2025 Place Base carried out twenty-three semi-structured interviews with people involved at a senior level across the residential development industry. They were engaged in a range of different organisations and disciplines and for the purpose of our research we have categorised them as below:

Type of organisation	Number of interviewees
Fire engineer	Two
Housing association	Seven
Homebuilder	Six
Fire safety advisor	Three
Architect	Four
Building consultant	One

Almost all were clear that the introduction of the requirement for second staircases had significantly disrupted plans to deliver new homes, either within their own organisation (for the seven housing associations and five of the six homebuilders) or organisations that they were working with (the other ten interviewees). Only one organisation had not yet seen a negative impact noting “We have a couple of schemes where we have increased the height, I’m not aware of others.” (Homebuilder).

Others had experienced negative impacts flowing immediately from Gove’s announcement, despite the transitional arrangements and repeated messaging around buildings with a single staircase being safe “Our partners immediately paused development and were not prepared to consider delivery of schemes over 18 metres with a single staircase” (Homebuilder).

The contradiction between the messaging on existing buildings and the requirement for a second staircase from 18 metres frustrated many interviewees “How can it simultaneously be true that all these existing buildings are safe with one staircase and that it is proportionate to introduce massive additional cost and design restrictions to new buildings?” (Architect). None of the interviewees could see significant safety benefits of the requirement with the starkest statement being:

“My considered analysis is that the second staircases will not save a single life.” (Fire Engineer).

The consensus from interviewees was that the requirement for second staircases at 18 metres created a non-viable ‘chasm’ of heights, commonly thought to be around 18 to 30 metres. With full design scrutiny many organisations felt that a six storey building could be delivered under the 18 metre limit although one warned “six storeys is bang on the cusp and should be checked carefully” (Fire safety advisor).

Just above this height was widely considered non-viable “There are a myriad of reasons preventing projects from progressing, overall very little will be delivered at heights between 18

and 30 metres.” (Homebuilder) with significant caution applied “we are mindful of height and will avoid the 7-9 storey area – even ten is a push” (Homebuilder).

“Because of the huge step-change in costs at 18m, with the requirement for a second staircase and the oversight of the Building Safety Regulator it will not be cost effective to build a seven storey building.” (Fire Engineer)

This meant that most organisations were not looking at delivering homes in buildings that required second staircases - “We are primarily focused on buildings under the 18 metre threshold.” (Homebuilder). Another noted “We’re focusing on houses and low density flats” (Homebuilder).

Many organisations had already bought land or otherwise committed to schemes that would have been delivered with buildings above 18 metres in height. Almost all were now reducing those “We have massively reduced the height in [redacted scheme name].” (Housing association); “We’ve halved the height of most of our pipeline” (Housing association); “We’ve basically reduced the height of every building we were planning.” (Housing association); “In [redacted scheme name] the height of the building has approximately halved from our initial assumption” (Housing association); and “We designed a scheme with a 17-storey tower on [redacted site name], now there will be nothing built on it over 18 metres” (Architect).



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⁸ Low density housing scheme in construction, photo by Jamie Ratcliff

Estimating the impact

This industry feedback was used to create a set of assumptions for what would happen overall to homes planned in buildings over 18 metres in height. These were tested with housing associations, homebuilders and architects and resulted in an overall assumption that the number of homes in such planned buildings would be reduced by one quarter (25 per cent).

This is comprised of some schemes where no homes would be delivered at all (as the Government had predicted in their Impact Assessment), some schemes where some of the homes planned for a scheme would be lost through reducing the height of the building below 18 metres, some schemes where the height would be increased to over 30 metres to increase the number of homes and improve viability and some schemes where no homes would be lost (assumed to be those already over 30 metres). This is set out in the table below.

	Average homes on such schemes	Impact of change in number of homes	Proportion of schemes	Weighted impact on no. of homes	Weighted baseline no. of homes
Scheme lost completely	56	-56	5%	-2.8	2.8
Scheme reduced below 18 metres	72	-24	60%	-14.4	43.2
Scheme increased to 30 metres	64	16	5%	0.8	3.2
Scheme unchanged	48	0	30%	0	14.4
Total				-16.4	63.3

The weighted impact on number of homes is a reduction of 25 per cent (rounded down to the nearest percentage point), this combined with the relatively cautious assumptions set out in the table mean this is more likely to be an under-estimate than an over-estimate.



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⁹ Building site in London, photo by Jamie Ratcliff

Quantifying the impact nationally

The Government Impact Assessment used planning pipeline data to estimate that around 49,000 homes each year are delivered in buildings over 18 metres in height. It noted that this was around 25 per cent of new build completions in recent years. If this percentage stayed constant and the Government achieved its milestone of 1.5 million homes delivered in this Parliament then the number would exceed 75,000 homes per annum in years to come.

This does not necessarily reflect the geographical distribution of new housing supply under the new housing targets that the Government has introduced. In order to get closer to that our research applied an assumption to Local Planning Authority targets that 50 per cent of the target would be in such buildings in London, 20 per cent in Urban areas outside of London and zero per cent in intermediate or majority rural areas.

The results of this, combined with the 25 per cent reduction in delivery on such sites, carried forward from the previous section is set out in the table below.

	Aggregate annual housing targets	Projected homes in 18m+ buildings	Projected homes lost per annum due to second staircase
East of England	44,861	4,084	1,021
East Midlands	27,382	1,729	432
London	80,693	40,347	10,087
North East	12,202	1,516	379
North West	37,821	5,966	1,491
South East	69,059	7,383	1,846
South West	40,343	2,755	689
West Midlands	23,542	3,991	998
Yorkshire and the Humber	27,432	4,073	1,018
Total	363,335	71,844	17,961

Applying the 25 per cent of supply figure used in the Government's Impact Assessment would mean that over 90,000 homes would be delivered in buildings over 18 metres and using the 25 per cent reduction the number of homes lost per annum due to second staircase rules would be 22,708 – 113,542 homes over a five-year period. This means again that the numbers above are more likely to be an under-estimate than an over-estimate.

Region	Number of homes projected to be lost due to second staircase rules over five-year period
East of England	5,105
East Midlands	2,161
London	50,433
North East	1,895
North West	7,457
South East	9,229
South West	3,443
West Midlands	4,989
Yorkshire and the Humber	5,092
Total	89,805

Eighty-nine thousand homes may only be six per cent of the Government's 1.5 million home target but it is a vast number, equivalent to the urban area of Milton Keynes. In the short to medium term it is likely these homes are lost to supply but if housing targets are to be delivered overall then these homes will have to be delivered in other locations that are more car-reliant, have less access to employment opportunities and social infrastructure.



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¹⁰ Mid-rise residential development London, Photo by Jamie Ratcliff

International context

There is a wide range of international practice in requirements for second staircases, ranging from no requirements in Switzerland, South Korea and Japan to a requirement to have one in all buildings of any height in Uganda and Pakistan¹¹. The requirement for a second staircase at 18 metres is therefore not an outlier but does place the UK at the more restrictive end of the range.

What does place the United Kingdom as an outlier is the move to make standards more restrictive at this point in time. The Center for Building in North America is tracking¹² the move across multiple jurisdictions to allow single staircases in a larger number of new buildings. At the time of writing 20 US states, 11 US cities, three Canadian cities and two Canadian provinces had at least started the process of reform.

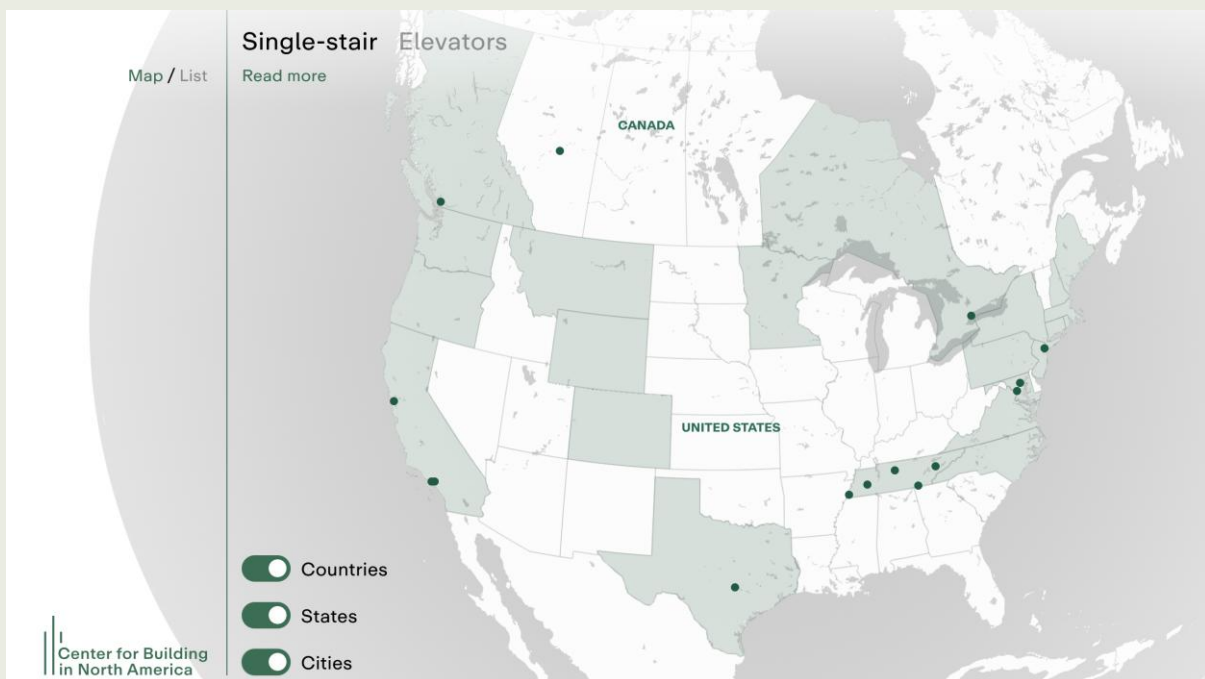


Fig. one Screenshot from Center for Building in North America's tracker of reform to ease requirements on dual-staircases.

A joint report by the Center for Building in North America and Pew Charitable Trusts¹³ found that over a twelve year period from 2012 to 2024 fire death rates in modern buildings with a single staircase were no different to those in other residential buildings in New York City. They found that there were no deaths in Seattle or New York City recorded in modern four-to-six storey buildings with single staircases over that period attributed to the lack of a second staircase.

¹¹ The Second Egress: Building a code change, <https://secondegress.ca/Jurisdictions>, accessed on 12 December 2025

¹² Center for Building in North America, <https://www.centerforbuilding.org/trackers>, accessed on 12 December 2025

¹³ Small single-stairway apartment buildings have strong safety record, Center for Building in North America and Pew Charitable Trusts (2025), <https://www.pew.org/en/research-and-analysis/reports/2025/02/small-single-stairway-apartment-buildings-have-strong-safety-record>, accessed 12 December 2025

The same report also makes a powerful point that such rules prevent the construction of new buildings, with much greater fire protection, leaving – particularly lower income households – living in older, less safe buildings.

“the rules requiring two stairways in buildings taller than three floors may actually increase fire risk by discouraging the construction of new multifamily housing, which has other safety measures in addition to sprinklers, such as self-closing doors and fire-rated walls” – Center for Building in North American and Pew Charitable Trusts, 2025



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¹⁴ Tall building in construction in Spain, Photo by Jamie Ratcliff



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¹⁵ Tall building in construction in London, Photo by Jamie Ratcliff

Conclusions

The UK's requirements for second staircases are a real mess. They have sown confusion in terms of the safety of existing buildings with single staircases, whilst on the basis of the Government's own statistical analysis are unlikely to save a single life in the lifetime of anyone reading this report.

They will still impact on the lives of many. The 89,000 homes estimated to be lost as a result of these requirements will inevitably undermine the Government's milestone of building 1.5 million safe and decent homes in England by 2029. This isn't just a political problem. It means that tens of thousands of households will be living in less suitable, safe accommodation. It means that the reduction in the 172,000 children¹⁶ currently living in Temporary Accommodation will be slower. In a single year 80 children died living in Temporary Accommodation¹⁷ and over a five year period 74 children died with Temporary Accommodation as a contributing factor to their vulnerability, ill-health or death.

The Housing Secretary has repeatedly made calls to "Build, baby, build!"¹⁸, but prioritising the administration of second requirements over the real life safety experiences of people who should be able to live in the homes that are not being built hollows the rhetoric. As Centre for Cities have noted¹⁹ the ongoing review of the definition of High-Risk Buildings offers government an opportunity to review requirements for second staircases. In the medium-term, it is unlikely there even be an administrative reason to require second staircases at 18 metres.

Recommendation – The Government should use the opportunity of the ongoing review of the definition of High-Risk Buildings to raise the height at which second staircases are required in residential buildings to 50 metres.

On the basis of the risk analysed by government and summarised in earlier section it would seem sensible to set the second staircase requirement for buildings in excess of 50 metres in height. This would bring the UK into line with France (50 metres), Finland (52 metres) and Sweden (16 storeys) but still be more onerous than Germany, Ireland and Singapore (all 60 metres)²⁰.

¹⁶ UK Government press release (2025), <https://www.gov.uk/government/news/over-half-a-million-children-to-be-lifted-out-of-poverty-as-government-unveils-historic-child-poverty-strategy> , accessed on 12 December 2025

¹⁷ All Party Parliamentary Group on Temporary Accommodation (2025), <https://householdsintemporaryaccommodation.co.uk/reports/child-mortality-in-temporary-accommodation-2025/> , accessed on 12 December 2025

¹⁸ UK Government press release (2025), <https://www.gov.uk/government/news/housing-secretary-issues-call-to-arms-to-build-baby-build> , accessed on 12 December 2025

¹⁹ Breaking the Bottlenecks: Reforming 'anti-supply measures' to support urban housebuilding, **Breach A (2025)**, <https://www.centreforcities.org/reader/breaking-the-bottlenecks/dual-staircase-requirements/>, accessed 15 December 2025

²⁰ The Second Egress: Building a code change, <https://secondegress.ca/Jurisdictions> , accessed 12 December 2025



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