Fire Strategy: Guidance Note for Clients

Legal status, required content and how requirements change for higher-risk buildings (HRBs)

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Prepared for client reference. England only. This note summarises current guidance; it is not legal advice — a project-specific fire strategy should always be prepared by a competent fire engineer.

1. Purpose and scope

This note explains what a fire strategy is, whether it carries legal weight, what it must contain to satisfy Approved Document B and the Building Safety Act's "golden thread", and how requirements step up for a higher-risk building (HRB). Throughout, passages marked "Higher-risk building" call out where the standard expected is materially greater than for a standard commercial or residential building.

An HRB is, in summary, a building that is 7+ storeys or at least 18 metres high and contains 2+ residential units, or is a hospital or care home meeting the height/storey test. All other commercial and residential buildings are referred to here as standard buildings.

2. Is a fire strategy a legal document?

Not in its own right. No statute names a document called a "fire strategy" and makes it mandatory by that name. It carries legal weight indirectly, through three routes:

- **Building control:** Approved Document B expects a fire strategy as the evidence base for how the design meets Building Regulations Part B; building control will not readily approve a non-domestic or complex building without one
- **Fire risk assessment:** under the Regulatory Reform (Fire Safety) Order 2005, article 9, the responsible person's fire risk assessment should test the occupied building against what the strategy says; a mismatch, or no strategy at all, is evidence used against the responsible person in enforcement
- **The golden thread:** for higher-risk buildings, the Building Safety Act 2022 makes maintaining accurate building safety information a statutory duty, and the fire strategy is a core part of that information
- **Higher-risk building: The fire strategy is not optional evidence but a mandatory, named part of the golden thread and the safety case report the accountable person must keep current for the life of the building.**

3. Must-have components to satisfy Part B

Content should be building-specific, not generic. At minimum:

Requirement	What the strategy must cover
B1 — Means of warning and escape	Escape route layout, travel distances, protected stairs, refuges, evacuation lifts (if any), and the evacuation strategy (simultaneous vs. phased) with justification
B2 — Internal fire spread (linings)	Surface spread of flame classification for wall and ceiling linings
B3 — Internal fire spread (structure)	Compartmentation lines, fire-resisting walls/floors, fire-stopping at service penetrations, protected shafts, smoke control measures

Requirement	What the strategy must cover
B4 — External fire spread	External wall and cladding construction, façade fire performance, boundary distances
B5 — Access and facilities for the fire service	Fire appliance access, dry/wet risers, firefighting shafts and lifts, hydrant locations
Detection and alarms	Required fire alarm category and detection system coverage (not a numbered B-requirement, but expected in practice)
Management and maintenance	Who tests, checks and maintains each measure, and how often — Approved Document B assumes the building will be properly managed in use

On the evacuation strategy element of B1, where a building cannot support a stay-put strategy (for example because of a compartmentation or cladding defect), the strategy should reference the National Fire Chiefs Council's simultaneous evacuation guidance for purpose-built blocks of flats, which sets out the decision-making process for moving to simultaneous evacuation and the resident engagement that should go with it.

4. Golden thread requirements

For the golden thread, the test is not whether the content exists but whether it is structured to stay correct and traceable:

- Held in a digital, version-controlled record-keeping system, not a static file, so every revision is logged against a change-control record
- Explicitly cross-referenced into the fire and emergency file handed to the accountable person / responsible person at completion
- Written so a non-specialist accountable person can use it to understand the fire risks they are responsible for, not only the original design team
- Clearly owned, with defined review triggers (design change, refurbishment, change of use, a mandatory occurrence report)
- **Higher-risk building: For an HRB this is a statutory duty feeding directly into the safety case report, mandatory occurrence reporting system and resident engagement strategy, with the Building Safety Regulator able to request the information at any time.**

5. Higher-risk vs. standard building: what actually changes

The technical discipline is the same; the process, scrutiny and post-completion obligations are not:

Aspect	Standard building	Higher-risk building
Regulatory route	Local authority or Registered Building Control Approver; reviewed largely at completion	Building Safety Regulator (BSR) via three statutory gateways
Pre-construction check	No mandatory pre-start approval gate	Gateway 2 — a hard stop; construction cannot start until BSR approves the design, including the fire strategy
Completion check	Standard completion certificate process	Gateway 3 — an updated, as-built fire strategy must be submitted and approved before occupation
Evacuation strategy scrutiny	Reviewed against Approved Document B guidance	Heavier scrutiny; simultaneous evacuation is generally the default expectation, with phased/stay-put needing strong engineering justification

Aspect	Standard building	Higher-risk building
Structure and external walls	Checked for Part B compliance	Forensically scrutinised — compartmentation, structural fire resistance and cladding are the areas the post-Grenfell regime was built around
Life after completion	Filed alongside the fire risk assessment; no statutory duty to keep it live	Becomes part of the mandatory golden thread and feeds the safety case report the accountable person must maintain for the building's life
Author competence	Professional expectation only — no statutory declaration required	Statutory duty under Part 2A of the Building Regulations; competence declarations (PAS 8671 for the principal designer) are validated by BSR at Gateway 2

6. Who is competent to author the strategy

Building type	Competence expectation
Standard (non-HRB) commercial building	No licensed register. Competence is judged professionally: a fire engineer or fire safety consultant with a relevant engineering degree and demonstrable fire safety design experience, ideally chartered through the Institution of Fire Engineers (IFE) or registered with the Engineering Council. Building control generally accepts this without requiring formal proof.
Higher-risk building	A legal duty, not just an expectation. Part 2A of the Building Regulations (in force since 1 October 2023) requires clients to be satisfied the appointee is competent, and requires the appointee to be honest about it. The fire strategy author (typically acting as, or reporting to, the principal designer) is assessed against PAS 8671; signed competence declarations are a required part of the Gateway 2 submission, and BSR checks that they exist and match the people actually appointed. Competence is project-specific — being competent for a low-rise refurbishment does not carry over to a 30-storey HRB.

Two further recognised competence routes sit alongside PAS 8671 and IFE/Engineering Council chartered status, and are worth checking for on an HRB project:

- **UK-SPEC HRB (Engineering Council):** a dedicated competence standard for engineers and technicians working on higher-risk buildings, assessed across five areas — knowledge and understanding, problem-solving, leadership, communication and professional commitment — leading to entry on the Engineering Council's HRB Register at Engineering Technician, Incorporated Engineer or Chartered Engineer level
- **BS 8674:2025 (BSI):** a code of practice setting a competence framework for individual fire risk assessors; relevant wherever the fire strategy author is also producing, or working closely with whoever produces, the fire risk assessment the strategy must be tested against

7. Practical checklist for clients

Action	Standard building	Higher-risk building
Commission the strategy early	At concept design, not as a late compliance exercise, to avoid redesign costs and delays	
Confirm author competence	Check professional background and IFE/Engineering Council status	Also obtain and file a PAS 8671-aligned competence declaration for Gateway 2

Action	Standard building	Higher-risk building
Cross-reference the fire risk assessment	Ensure the FRA (FSO article 9) tests the building against what the strategy says	Ensure it also feeds the safety case report
Plan for the regulatory timeline	Standard building control review periods	Budget real time for Gateway 2 (pre-start) and Gateway 3 (completion) approval — construction cannot start or complete without them
Set up record-keeping	Keep the strategy with other O&M documentation	Set up a digital, version-controlled golden thread record before design work starts; hand over into the fire and emergency file at completion
Review triggers	Update on refurbishment, alteration or change of use	Same triggers, plus mandatory occurrence reporting and periodic safety case review as a live, ongoing duty

8. Sources

- Fire safety: guidance for those with legal duties (GOV.UK) — www.gov.uk/government/collections/fire-safety-legislation-guidance-for-those-with-legal-duties
- Fire safety: Approved Document B (GOV.UK) — www.gov.uk/government/publications/fire-safety-approved-document-b
- Keeping information about a higher-risk building: the golden thread (GOV.UK / Building Safety Regulator) — www.gov.uk/guidance/keeping-information-about-a-higher-risk-building-the-golden-thread
- Understanding the golden thread (Building Safety Regulator, Making Buildings Safer, gov.uk campaign site) — buildingsafety.campaign.gov.uk/building-safety-regulator-making-buildings-safer/building-safety-regulator-news/understanding-the-golden-thread
- Building control approval for higher-risk buildings — Gateway 2 (GOV.UK / Building Safety Regulator) — www.gov.uk/guidance/building-control-approval-for-higher-risk-buildings
- Gateway Three: the final safety gate (Building Safety Regulator, Making Buildings Safer, gov.uk campaign site) — buildingsafety.campaign.gov.uk/building-safety-regulator-making-buildings-safer/the-building-control-authority/gateway-three-the-final-safety-gate-before-occupation
- Design and building work: meeting building requirements — competence requirements, PAS 8671/8672 (GOV.UK / Building Safety Regulator) — www.gov.uk/guidance/design-and-building-work-meeting-building-requirements
- The Building Regulations etc. (Amendment) (England) Regulations 2023 (legislation.gov.uk) — www.legislation.gov.uk/uksi/2023/911
- Regulatory Reform (Fire Safety) Order 2005 (SI 2005/1541) (legislation.gov.uk) — www.legislation.gov.uk/uksi/2005/1541
- UK-SPEC Higher-Risk Buildings (HRB) Standard (Engineering Council) — www.engc.org.uk/uk-spec-hrb
- BS 8674:2025 — Built environment: framework for competence of individual fire risk assessors, code of practice (BSI) — knowledge.bsigroup.com/products/built-environment-framework-for-competence-of-individual-fire-risk-assessors-code-of-practice
- Simultaneous Evacuation (High-rise) guidance (National Fire Chiefs Council) — nfcc.org.uk/our-services/building-safety/protection-building-safety/stay-put/simultaneous-evacuation-high-rise