



BEFS RESPONSE: SCOTTISH BUILDING REGULATIONS: FIRE SAFETY REVIEW AND COMPLIANCE

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland’s existing built and historic environment.

This is a response from BEFS to selected questions of a Scottish Government [2026 call for evidence on fire safety in Scottish Building Regulations](#). The purpose of the consultation is to gather views on fire safety in building standards, in the context of the [Grenfell Tower Inquiry Phase 2 Report](#) recommendations and the proposed introduction of Compliance Plan Managers as set out in [part three of the consultation paper](#).

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- [Review of Fire Safety in Building Regulations](#) (March 2025)
- [Managing Change: Fire and Historic Buildings](#) (March 2023)

Q1(a) Are there existing fire safety topics and guidance within the technical handbooks that should be reviewed?

Yes. BEFS understands from its Member organisations, including the Royal Incorporation of Architects in Scotland (RIAS), that some of the general language in the technical handbooks is subject to varied interpretation. This can cause challenges in practice including inconsistency of implementation and understanding across stakeholders and create ambiguity with regard to the consideration of building warrants.

One example provided to BEFS concerns the phrase “where reasonably practicable” in Section 2 (Fire), which RIAS report is causing challenges for their Member architects that submit warrants for existing buildings to planning authorities. These reports indicate the open nature of the phrase is leading to mixed interpretation and application, resulting in inconsistencies.

Further examples are a desire of increased clarity on the definitional border between “minor” and “significant” works with fire implications, and on the volume of documentary evidence required to demonstrate compliance.

A review of language to provide clearer descriptions in the relevant sections of the technical handbooks could add significant value in supporting understanding, expectations and consistency across the sector.

Q5(a) Do you consider current guidance on escape for vulnerable and disabled people to be effective and up to date?

Not sure. BEFS understands that this guidance is well-considered, but could benefit from further exploration with regard to different existing building typologies.

A provision of more detailed examples and case studies were proposed as one approach to improve the practical value of this guidance.

Q5(b) Is the current guidance easy to understand and consistently applied?

Not sure. RIAS has reported to BEFS that there are variations in the interpretation of requirements for some important aspects, including management procedures and evacuation lifts.

Q5(c) What improvements or changes are needed in this area?

Detailed examples and case studies would further support the effective application of guidance to more complex buildings including historic typologies.

A review of language to ensure clarity of understanding of descriptions across sectors and stakeholders, and consistency in practice, would also help to improve implementation.

BEFS has previously argued that clear signposting to relevant advice and further information is particularly important with regard to fire safety guidance for historic buildings. Escape plans for vulnerable and disabled people should carefully consider particularly sensitive or complex parts of these buildings.

Q6(a) Is the current guidance for fire strategies and fire safety design summaries effective and up to date?

Not sure. BEFS Member feedback suggests that the level of detail expected in fire strategies can vary significantly in practice, and that all stakeholders could benefit from enhanced clarity of expectation. The provision of a variety of examples could assist with addressing this.

Q6(b) Is the current guidance easy to understand and consistently applied?

Not sure. BEFS is aware from RIAS Members that interpretations and expectations, including the detail of evidence required, varies in practice.

The consistency of application is also negatively affected by the growing pressures on built environment capacity in local government and planning authorities. BEFS Member Royal Town Planning Institute Scotland highlights a 28.6% reduction in planning spend from 2010-2023 ([source](#)), and its 2025 State of the Profession report demonstrates major resourcing and skills gaps in planning teams, with most survey respondents reporting that they felt overstretched frequently or all of the time ([source](#)).

Discussions in the [Conservation Officers Group](#), a forum for those working with a built environment remit in planning authorities, which is facilitated by BEFS, further confirms that significant capacity pressures in local government greatly affect the consistency and quality of national policy outcomes.

A two-pronged approach to reviewing guidance for consistency and easing capacity pressures in the planning system, would support better outcomes for safety and compliance.

BEFS responses to a number of consultations in relation to the built environment can be found at: <https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: Publish response with name

Are you content for other Scottish Government policy teams who may be addressing the issues you discuss to contact you again in relation to this consultation exercise? YES

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