

Serviced Apartments / Aparthotels

A Growing Fire Safety Challenge for the Built Environment

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Why Fire Professionals Need to Pay Attention

Serviced apartments and aparthotels are becoming increasingly common across the UK, particularly in urban developments and mixed-use buildings. Whilst the layout of these units are often very similar to standard residential flats, they are rented out for varying durations from single nights to several months (or even years) creating a grey area in fire safety compliance and enforcement. This can affect the design as well as the management of these buildings.

This note is focussed on the regulations in England, although many of the issues and principles raised would also apply in other countries.

The term “serviced apartment” is commonly used to refer to longer term occupancy and “aparthotels” is used for shorter term occupancy, although as those terms are not formally defined, that can vary significantly.

Fire safety guidance documents for blocks of flats typically expect long term occupancy with a resulting familiarity with the building. Short term occupancy would be closer to hotel usage, although hotel bedrooms do not usually include the cooking facilities that would often be present in serviced apartments and aparthotels. Hotels usually provide meals in a communal location which serviced apartments and aparthotels often do not.

Also, fire regulations often treat buildings that contain “dwellings” differently from buildings that do not. The definition of what counts as a “dwelling” can be complex, but duration of occupancy is typically one of the more important factors. An apartment that is rented out by the day is unlikely to be classified as a “dwelling”, whereas one that is rented for a year is more likely to meet that criteria. Duration of rental can therefore potentially affect the regulations that apply to the building.

Regulation 5 of the Building Regulations includes various scenarios that would be classified as a “material change of use”, including any changes to the number of dwellings or turning the building into a hotel. As a result, converting any existing building to serviced apartments or an aparthotel would be likely to be classified as a “material change of use” which would require full compliance with the functional requirements of the Building Regulations. The “non-worsening” criteria that often applies when working on existing buildings would not apply.

Additionally the growing trend of converting redundant city-centre offices into aparthotels or flats supports urban regeneration but raises significant fire safety concerns, as the conversion can be complex and if not carried out competently it may fall short of purpose-built residential standards.

This emerging trend has raised significant concerns among fire engineers, fire risk assessors, and operational fire services, as well as regulatory bodies. The core issue? **Are serviced apartments and aparthotels treated as blocks of flats, hotel rooms, or a hybrid of the two?** The answer has far-reaching implications for fire strategy, regulatory compliance, and life safety.

This note is intended to be a brief overview of the key issues. It is specifically focussed on fire engineers, although the contents of this note may be of interest to other organisations. This note addresses issues that may affect the design as well as the occupation phase of the buildings. If, in any specific situation, there is uncertainty about issues which may be outside of the fire engineer's expertise (such as the strict legal interpretation of specific terms) it is recommended that the fire engineer seek specialist support.

Key Issues to Consider

1. Evacuation Strategy: Stay put vs. Simultaneous Evacuation

Traditionally, blocks of flats are designed with a **stay put** strategy, based on the assumption that:

- Each unit is a self-contained fire compartment.
- Occupants are familiar with the escape routes and fire procedures.

The fire precautions that are included in blocks of flats support that approach can vary depending on factors such as building height, but typically including fire compartmentation measures, sprinklers, smoke ventilation in corridors and separate fire alarms within each flat. The fire strategy is usually not reliant on management presence within the building to coordinate the early response to a fire.

However, serviced apartments and aparthotels challenge this model. When units are rented out by the day or week, occupants are transient and unfamiliar with the building — much like hotel guests. In such cases, a simultaneous evacuation strategy may be more appropriate, but this would require different design and management considerations, including:

- Enhanced detection and alarm systems.
- 24/7 staff presence and evacuation planning.
- Clear signage and escape route management.

Alternatively, other evacuation strategy options could be utilised. One possibility that may be appropriate for some situations would be a hybrid approach whereby an initial smoke detector activation would trigger an alarm first in the flat of fire origin, then escalate to a full simultaneous evacuation if a heat detector activates in the flat, possibly in a key location such as in the entrance hall or near the flat entrance.

This would need careful consideration alongside the appropriate management response as well as any smoke control system in the common areas, which are typically designed for just one flat evacuating at a time.

In any case, the use of sprinklers (or alternative automatic suppression systems) should be considered as part of the overall strategy.

It would also often be found that designing the building purely based on conventional hotel usage might not be appropriate either because the apartments often include cooking facilities, which would not normally be present in hotel bedrooms.

There would also likely be more flexibility in how habitable spaces are used, and occupancy characteristics may differ from a hotel. If there are delays to the evacuation, it may be prudent to also apply the additional compartmentation and escape route protection measures typically used in apartments (possibly also with sprinklers in the apartments) to cover the more demanding scenario. Likewise, additional measures may be needed for occupants who require evacuation assistance. These additional measures would have to be decided on a case-by-case basis.

If the building includes a combination of short term and long term occupancy this could create additional complexity. That would be particularly challenging if there are a combination of privately owned flats as well as aparthotel short term rental flats within the same building. It is unlikely to be feasible to use a combination of different evacuation strategies for the different occupancy areas, so whatever evacuation strategy is used would need to work for all areas. This may also create challenges with ownership and management responsibility.

Furthermore additional complexity can arise from ancillary accommodation. Many aparthotels and short-term lets include roof terraces, gyms, and shared lounge areas as part of their offer. Some fire strategies place multiple responsibilities on the security concierge, including the evacuation of these spaces in the event of a fire. This approach would typically require 24/7 staffing and a high level of training. Designers and engineers should ensure that any fire strategy relying on a managed approach is realistic in terms of the long-term financial and competence commitments required of those responsible for implementing it.

It should be emphasised that standard design guidance documents are based on standard types of buildings (referred to in Approved Document B as “common building situations”). Serviced apartments and aparthotels may therefore require bespoke fire strategies developed by a competent fire engineer who has taken into account all relevant factors.

2. Regulatory Classification: HRB or Not?

The classification of serviced apartments can also affect how they are regulated.

For example, in England, there are separate regulations that apply to Higher Risk Buildings (HRBs). Those regulations apply to buildings that are over a certain height, but only if their occupancy contains at least two residential units, a care home or a hospital. The term “residential units” includes dwellings, student accommodation and other uses, but excludes hotels. As noted earlier, serviced apartments and aparthotels include some, but not all aspects of both dwellings and hotels. As such, at present it is not clear whether they would be within the HRB occupancy definition although presumably this may be clarified in future.

When designing a new building, or carrying out building works on an existing building, this distinction is critical for developers, designers, managers and regulators, as it determines the level of oversight and the applicable safety standards. Building Regulations application for non-

HRBs would go to the Local Authority or a Registered Building Control Approver (RBCA), whereas applications for HRBs would go to the Building Safety Regulator (BSR).

This also affects buildings in occupation, because existing HRBs have to register with the BSR and ensure that there is a Building Safety Case in place. Failure to do so could be a criminal offence, so disagreements or misunderstandings about whether a building occupancy is classified as “dwellings” or a “hotel” and, as a result, whether it meets the criteria for an HRB could have significant consequences.

It would potentially also mean that changes in usage of an existing building could change the regulatory situation.

For example, if a tall aparthotel building that was initially only used for short term rentals changes its approach so that two or more of the apartments are rented out on a long term basis, to a point where they become classified as “dwellings”, that could mean that the building has then become an HRB, with the consequent legal implications. Where regulations allow, it may be more prudent to treat these buildings as HRBs due to the hybrid/dual nature of the occupancy. Alternatively, seeking a legal opinion on the situation for the specific building may also help clarify the issues.

3. Fire Risk Assessments (FRAs)

Under the Regulatory Reform (Fire Safety) Order 2005:

- **Dwellings are excluded** from the scope of the FRA.
- **Non-dwellings must be included** in the FRA.

If serviced apartments/aparthotels are not dwellings, then the fire risk assessment must legally cover the apartments themselves — not just the common areas. This has implications for:

- The scope and depth of the FRA.
- Responsibilities of the Responsible Person.
- Enforcement and compliance.

If it is not clear whether the serviced apartments/aparthotels are dwellings, this should be highlighted to the client. A conservative approach would be to include them within the FRA if that is possible.

Implications for Fire Professionals

Fire engineers, assessors, and firefighters should be alert to the following when encountering serviced apartments:

- **Clarify the intended use and occupancy pattern** during design and assessment stages of new buildings, changes to usage of existing buildings or for work on existing

- buildings. The Qualitative Design Review (QDR) process is a good way of carrying this out. Ensure that clients understand that any subsequent changes they make to that occupancy pattern might have significant consequences.
- **Seek support from specialists** if there are uncertainties relating to key issues that are outside of the fire engineer's expertise (such as interpretations of legal definitions)
- **Challenge assumptions** about evacuation strategy — stay put may not be suitable
- **Fire strategies relying on managed evacuation must reflect realistic staffing, training, and financial commitments.**
- **Ensure fire risk assessments are legally compliant**, especially if the units are not classified as dwellings.
- **Engage with developers and building control bodies early** to determine the correct regulatory pathway.
- **Basing designs purely on guidance for blocks of flats or hotel usage may not be appropriate** – these types of buildings need bespoke strategies, developed by competent fire engineers

Call to Action

Given the growing prevalence of serviced apartments and the confusion surrounding their classification, **Institution of Fire Engineers (IFE)** and the **Fire Industry Association (FIA)** have published this short introductory guide to help practitioners navigate the regulatory landscape and ensure that fire safety strategies are appropriate, legal, and effective. IFE and FIA would encourage further work to be undertaken on this complex issue.