

Ariane Burgess MSP
Convener
Local Government, Housing and Planning Committee

Dear Convener,

Building (Scotland) Amendment Regulations 2025 SSI 2025/312

Thank you for your letter of 19 November 2025.

The Royal Incorporation of Architects in Scotland (RIAS) were represented on the Scottish Government Building and Fire Safety Expert Working Group (BFSEWG) which met to take forward the recommendations of the Cameron House Hotel Fatal Accident Inquiry directed towards the Scottish Government.

The issue identified within the letter from the RIAS is considered and accounted for within the proposed new guidance clause 2.15.7 of the Building Standards Technical handbooks. The guidance is intended to ensure that the potential use of bed settees within suites and all bedrooms, including staff bedrooms, is captured

The intention of rooms used for sleeping accommodation is clarified in the revised Technical Handbook guidance with the particular concern for potential use of bed settees being addressed by 'living rooms within suites', as follows:

[extract] Draft new clause - 2.15.7 Conversion of traditional buildings to hotel use

Traditional buildings converted to hotels with 15 or more rooms used for sleeping accommodation must have an automatic fire suppression system installed in accordance with guidance set out in Clause 2.15.1 Automatic fire suppression systems. A hotel under the current definition of residential building includes guest house, boarding house, hostel, boutique and apart hotel. Bedrooms, living rooms within suites and staff bedrooms are all considered to be rooms used for sleeping accommodation.

I would also note the following:

- The application in practice will be monitored under the Section 34 process of the Building (Scotland) Act 2003 which includes that a verifier must notify the Scottish Government where future conversions of traditional buildings are to be used as hotel accommodation.
- The Technical Handbook guidance will be strengthened where the conversion has not more than 14 rooms used for sleeping accommodation.
- The guidance will also explain the 15 bedroom threshold.

The rationale in relation to more than 14 rooms was discussed at meeting 4 of the BFSEWG (2 June 2025). BS EN 16925:2018 is a standard that provides guidelines for the design, installation and maintenance of automatic residential sprinkler systems, ensuring fire safety in residential buildings. Contained within papers discussed at the meeting indicate the following:

A small hotel is defined in BS EN 16925 as a hotel or guest house with up to 14 lettable rooms and an occupied floor at a height of up to four storeys or 18 m above the lowest fire brigade access level, without a licence to sell alcohol.

We know that this threshold encompasses the meaning of B&B, guest house etc. as defined with the Scottish Government guide for existing buildings with sleeping accommodation and therefore meets the consensus of the expert panel being that small hotels, bed and breakfast establishments and boarding houses are out-with the scope of Recommendation 4.

I hope the information I have provided is of assistance to the Local Government, Housing and Planning Committee.

Yours sincerely,

MÀIRI MCALLAN