



## Safety by Design in Europe's Housing Simplification Agenda

The **European Affordable Housing Plan** has established a clear political priority: Europe must deliver more housing, faster and more affordably, while ensuring quality, sustainability and resilience. The forthcoming **Housing Simplification Package** will be central to achieving this objective. Its success, however, will depend on a simple principle: simplification must improve delivery without weakening protection.

In parallel, the **European Parliament** has reinforced and sharpened this political direction, calling for a Housing Simplification Package that reduces administrative burdens and shortens permitting timelines, while preserving key safety, environmental and social standards. It has also explicitly recognised fire safety as an integral component of housing quality and called for **stronger EU-level coordination to enhance fire safety** across Member States.

### Simplification must strengthen safety, not weaken it

In the construction sector, simplification is sometimes interpreted as reducing regulatory requirements. This would be counterproductive. Many of the rules shaping planning, permitting and building standards exist precisely to protect life, health and the overall quality of the built environment. Moreover, **buildings that are not safe are not sustainable**: fire incidents result in loss of life, environmental damage, economic cost and premature renovation or reconstruction. Fire and life safety are therefore a direct contributor to the longevity and sustainability of Europe's building stock.

The objective of simplification should therefore not be to reduce the level of protection, but to improve the way it is delivered. Experience shows that delays in housing delivery are rarely caused by safety requirements themselves, but by fragmented procedures, inconsistent interpretations and unclear responsibilities across administrative levels. For this reason, we support a clear and pragmatic principle: **simplify procedures, not safety outcomes**. This means eliminating duplication, reducing fragmentation across administrative levels, clarifying responsibilities and streamlining documentation — while preserving substantive safeguards where they are essential.

### A safe-by-design simplification package

A credible Simplification Package should therefore be built on a **safe-by-design approach**, understood as a proactive approach where fire protection is integrated from the very first stages into planning, design and permitting, rather than being added as an afterthought to meet minimum requirements. This means embedding fire and life safety within digital and streamlined procedures, including digital permitting systems, ensuring that requirements are clear, predictable and consistently applied. Simplification should focus on eliminating duplication, aligning documentation and improving coordination, while maintaining the technical rigour necessary for effective fire and life safety, particularly in complex buildings.

Faster permitting can be compatible with strong safety standards if based on digital pre-assessments, document standardisation and risk-based differentiation between simple and complex projects. However, mechanisms such as automatic approvals in the absence of a decision (“positive administrative silence”) should never apply to essential fire and life safety checks.

**Digitalisation** will be a key enabler. Interoperable permitting systems can accelerate processes, improve traceability and strengthen accountability, if safety requirements are fully integrated into these systems from the beginning. Standardised documentation and pre-assessment tools can further reduce uncertainty and administrative burden for both authorities and developers.

### Simplification starts with coordination

At the same time, **EU-level coordination** should be recognised as a central simplification lever. While building regulations remain a national competence, greater convergence in the interpretation and application of fire safety requirements can significantly reduce complexity. EU action can support simplification by promoting a common approach to fire risk assessment, facilitating shared guidance and best practices, and encouraging a more consistent framework for evaluating safety in new construction and renovation. Moreover, supporting training and technical capacity-building across authorities and professionals is essential to ensure this coordinated approach is applied effectively across Member States.

Effective simplification requires a stronger evidence base. **Harmonised EU-level residential fire data**, would enable clearer, more consistent and risk-based procedures, supporting better policymaking and reducing fragmentation. Without this, simplification risks reinforcing uncertainty rather than addressing it.

The Simplification Package must also be fully aligned with the **Energy Performance of Buildings Directive and its operational tools** which rightly require that energy renovation does not compromise safety. As electrification accelerates — through solar installations, energy storage systems and other technical solutions — fire and life safety becomes increasingly critical to ensuring that decarbonisation efforts deliver buildings that are not only energy-efficient, but also safe and durable over time.

### Simplifying to build better, safer and more inclusive housing

The opportunity is clear. Simplification, if properly designed, can accelerate housing delivery while strengthening the quality and resilience of Europe's built environment. By embedding **fire and life safety as a core component of housing policy**, integrating it into digital and streamlined processes, and using EU coordination as a lever for greater consistency, the European Union can deliver housing that is not only faster to build, but safer, more sustainable and more future-proof.

At the same time, fire risk is not evenly distributed. Vulnerable households, including those in social and affordable housing, are often disproportionately exposed. A credible housing policy must therefore ensure that fire safety measures are accessible, effective and systematically integrated into social and affordable housing strategies.

Safety is not a constraint on Europe's housing ambition — it is a precondition for its success.

### **Recommended actions for the European Commission**

- Strengthen **EU coordination** to reduce fragmentation and align interpretation of fire and life safety requirements across Member States
- **Build simplification on a safe-by-design approach**, by integrating fire and life safety into planning and permitting from the outset, including digital permitting systems, using digital pre-assessments, standardised documentation and risk-based procedures
- **Ensure that simplification does not compromise safety outcomes**, in particular by addressing fire risks in social and affordable housing and strengthening protection for vulnerable households.
- Ensuring that **automatic approvals** ("positive administrative silence") do not apply to critical safety verifications
- Develop **EU-level guidance** supporting a common risk-based approach to fire and life safety in building design, permitting and renovation
- Ensure **clear allocation of fire and life safety responsibilities** across the building lifecycle, preventing that simplification leads to unclear accountability or gaps in safety outcomes.
- **Support the development of harmonised EU-level fire safety data**, to enable clearer, more consistent and risk-based procedures and strengthen evidence-based simplification.
- Ensure full alignment with the **Energy Performance of Buildings Directive** so that renovation and electrification efforts enhance, rather than compromise, safety