

RICS response to consultation on *Valuation of properties in multi-storey, multi-occupancy residential buildings with cladding*, RICS guidance note

Executive summary

We consulted the public and professionals on proposed guidance intended to provide more clarity and consistency on when a valuer should need to request an EWS1 form before valuing a property in a multi-occupancy building. An EWS1 form provides expert input into the valuation process on the construction of the external wall of a building and helps inform lenders and valuers about whether remediation work that would affect value is needed.

We received and have considered 390 responses from leaseholders, RICS members, prospective buyers, fire safety professionals, other professionals involved in buying and selling properties, lenders and professional bodies.

The guidance provides risk-based criteria that valuers should use to decide whether to request an EWS1 form. We are pleased to have received feedback that the guidance is expected to reduce the numbers of EWS1 forms requested because we recognise that leaseholders in particular are suffering terrible consequences due to the current uncertainty around the remediation of buildings. We received feedback about the effects that unnecessary requests for EWS1 forms has on the financial, emotional and physical well-being of leaseholders. A reduced number of requests would also allow the scarce resource available to carry out the assessments to be focussed where it is needed.

We have taken the feedback that leaseholders shared with us very seriously, and tried as much as possible to create clarity while reflecting that the valuer's duty is to their lender client, and they must follow their client's instruction and use professional judgement.

As a result of the consultation responses we have amended the criteria. They are now slightly wider, to include buildings with high pressure laminate (HPL) cladding of any height, and those of five storeys or higher with combustible cladding linking balconies, needing an EWS1 request. We recognise that this change will disappoint a number of leaseholders, but we believe it is

necessary to ensure that buildings at higher risk of remediation work are investigated in the valuation process.

We have also sought to make the guidance even clearer in regard to a mortgage valuation not being a life safety fire risk assessment, and will provide more information to consumers about the differences between these processes.

We continue to work with the UK government and other stakeholders to ensure that this guidance is implemented by lenders, and remains consistent with future government advice and guidance. We are also continuing work to tackle other challenges to the market, including by developing training for EWS assessors and ensuring that professional indemnity insurance is available for professionals undertaking this work.

Background

1. The EWS1 process was developed and agreed by RICS, UK Finance and the Building Societies Association in December 2019 to enable a consistent mechanism for building owners to provide information to mortgage lenders and their valuers about the external wall systems of multi-storey, multi-occupancy residential buildings, and whether remedial work would be needed to resist the spread of fire over the facade.
2. Following changes to government guidance in January 2020, the original advice that EWS1 forms were only required for buildings over 18 metres (around six storeys) is no longer in line with expert fire safety advice. The result of this is that mortgage lenders and valuers are applying inconsistent criteria for determining when an EWS1 form is required, leading to a higher number of EWS1 assessments being required.
3. This increase in requests for EWS1 forms, together with the limited availability of competent assessors who have appropriate insurance to complete EWS1 forms, has caused a challenge in the selling and buying of properties in buildings with external cladding. We recognise the significant distress this has caused to many leaseholders who own properties in such buildings, and this guidance has been produced as part of a wider range of steps undertaken by industry and the UK government to support the proper and timely functioning of the homebuying market.

4. We are involved in a number of these related initiatives that are currently ongoing:
 - We have secured funding from the UK government to train chartered building surveyors and chartered building control surveyors to carry out EWS1 assessments, allowing the limited number of fire engineers to focus on higher risk buildings.
 - We welcome the government's commitment to developing an indemnity scheme to resolve the problem of the lack of availability of professional indemnity insurance (PII) for professionals in this field. We continue to work closely with MHCLG, HM Treasury and the insurance industry to develop the scheme for recognised professionals. As part of this, we will be working with insurers to ensure that adequate and appropriate PII cover is also available for the valuers relying on the EWS1 form.

Consultation process

5. Between 8 and 25 January 2021, RICS consulted on proposed guidance note *Valuation of properties in multi-storey, multi-occupancy residential buildings with cladding* (the guidance). This consultation forms an integral part of the RICS policy development process and ensures that the impact of proposed new guidance has been properly assessed and stakeholders have been consulted and given the opportunity to feed into proposals.
6. The guidance aims to provide clear criteria for when a valuer needs to request an EWS1 form in order to value a flat in a building with cladding. It is intended to help provide consistency for leaseholders and ensure that the housing market is able to continue to operate despite the concerns around the safety of cladding and the need for remediation.
7. The draft guidance and consultation document, including the questions we asked, can be read in full [here](#).

Respondents

8. A total of 390 written responses to the consultation were received. The majority of responses were received from leaseholders, with comments also received from RICS members, prospective buyers, fire safety professionals, other professionals involved in buying and selling properties, lenders, insurers, cladding experts and professional bodies.

9. We are grateful to everyone that took part in the consultation process, particularly to leaseholders and prospective buyers.
10. A full analysis of those who responded, and the answers to the questions asked in the consultation, is attached at Appendix A.

Summary of responses and conclusions

11. The majority of the responses received were supportive of the aim and content of the guidance where a respondent felt able to give an opinion.
 - 48% of respondents thought that the criteria set an acceptable level of risk for when a valuer could assume that a building would not need remediation work that would affect value, and only 24% did not (29% of respondents did not know).
 - 58% of the respondents thought that the guidance would allow more consistent decisions about when an EWS1 form should be requested.
 - 62% thought that the guidance would make it easier to understand whether an EWS1 would be needed for a building.
12. The majority of valuer respondents were in favour of a guidance note, subject to wider considerations included in the paragraphs below. There were positive comments from some valuer respondents around the consistency of approach that a guidance note could help to provide. A minority of respondents were of the view that an RICS guidance note would be obstructive to the delivery of valuation services.
13. An overview of the main themes from the consultation responses is outlined below.

Impact of the guidance

14. In responses to our question about the impact of the guidance, the majority either were not sure or thought it would have a positive impact, and lead to fewer requests for EWS1 forms. Leaseholders shared the negative effects that the current situation in the market were having on their finances, mental health, family and work life. A number of these leaseholders identified that their building would be likely to be able to be valued without requiring an EWS1 if the criteria in the guidance were followed by valuers. A number of RICS professionals who responded also shared this opinion.
15. A number of respondents thought that the existence of the EWS1 form was causing them to be stuck in properties that they could not sell and liable for repair bills that they felt it was unfair for them to have to pay. They reported difficulties with getting building owners to obtain EWS1 forms or provide information to them, and expressed the view that government and/or construction industry should make funding available so that the cost of remediation work and interim measures did not fall on leaseholders. Many referred to the dire financial consequences and risk of bankruptcy they face.

16. Some respondents, including valuers, thought that although the guidance was a good idea in principle, it would only work if lenders agreed to adopt it. One respondent suggested that the document should not be an RICS guidance note but rather a cross-industry protocol. Others were concerned about the language of the guidance leaving a margin of judgement for the valuer and that this meant that valuers would continue to ask for EWS1 forms to protect themselves from liability, even where this was not advised by the guidance.
17. A small number of respondents felt that the guidance meant a lowering of RICS standards and that RICS should be advising wide use of the EWS1 form, as to do otherwise risked people living in dangerous buildings or unknowingly buying a building that may need expensive remediation work. Responses from fire safety professionals wanted to ensure that the guidance is clear that neither it, nor the EWS1 form, is to be confused with a life safety fire risk assessment.
18. Respondents also commented on the need to work on developing and maintaining consistency between the criteria in the valuation guidance and existing and future government guidance and advice to building owners on fire risk assessments, which – although different from valuation decisions and the use of the EWS1 form – will affect future decisions on the remediation of properties.
19. Leaseholders also asked what effect the guidance would have retrospectively where their building had an EWS1 form which advised that remedial works were recommended, but the building fell outside the criteria in this guidance where a valuer should ask for an EWS1 form.

RICS response

20. We welcome the general view that the proposals would have a positive impact for some leaseholders living in lower rise buildings.
21. We recognise that the existence of the form and caution about government advice may be causing unnecessary requests for EWS1 forms from lenders and valuers and the guidance attempts to address this, given the deeply worrying consequences that this can have for leaseholders and the market as a whole.
22. RICS accepts that the guidance will only have the desired effect if lenders adopt it. The Building Societies Association (BSA) and UK Finance released a public joint statement on their respective websites, supporting in principle the aims and broad direction of travel of the guidance, although they both note that ultimately the decision whether to support the guidance will be made by individual lenders based on their risk appetites. RICS continues working closely with UK Finance, the Building Society Association and HM Treasury to achieve this intention.

23. While we understand why building owners and leaseholders in particular would like certainty, valuers must continue to have the opportunity to use professional judgement in making these decisions in order to meet their duty to their lender client. However, we hope that valuers and lenders will engage with the intention of this guidance to ensure that capacity to complete EWS1 forms is focussed on higher risk buildings.
24. The guidance provides broad risk-based criteria. These have been developed taking account of government advice and consulting experienced fire safety engineers. However, we have amended the guidance to make it clearer that a valuation inspection is not a fire safety assessment and cannot determine the risk of individual properties. We intend to produce more information for consumers to help them to understand the risks involved in homebuying as specifically suggested by the Law Society and Council for Licensed Conveyancers and others. We intend to publish this before the guidance comes into effect. However, we believe that the criteria in the guidance are appropriate and in line with government guidance to building owners about the need for remediation works.
25. We agree that ensuring that there is clarity and, where necessary, consistency between this guidance and government guidance and advice is important. The UK government has confirmed that the guidance is in line with the existing Consolidated Advice Note and has committed to work with industry to ensure consistency between this and future fire safety advice and guidance.
26. Valuers must take into account all known information that would affect the value of a property. This would include an existing EWS1 form and the guidance will not therefore have retroactive effect for buildings that already have an EWS1 form. We recognise that this will lead to leaseholders in those buildings being treated differently from those in other similar buildings but we cannot advise valuers to disregard available information. We hope that emerging government plans to provide additional funds for remediation will help some of the leaseholders in this situation.

Valuation practice and standards

27. Valuer respondents made comments on the mortgage valuation process, including the standards and guidance set out in *RICS Valuation – Global Standards* (Red Book Global Standards), *Red Book Global Standards: UK national supplement*, and the residential mortgage specification at Appendix 10 of *RICS Valuation – Professional Standards UK* January 2014 (revised April 2015). Comments were also made about the interaction of this process with panel management and lender terms and reporting templates.
28. One respondent queried whether the guidance was in compliance with requirements in Red Book Global Standards to undertake inspections and investigations that are professionally adequate for their purpose, and the requirement to take reasonable steps to

verify the information relied on in the preparation of the valuation. Other valuers expressed concerns about the competence of valuers to identify cladding and make the judgements required in the guidance.

29. Some respondents proposed changes to the disclaimers included in the draft guidance, seeking to clarify the scope, their responsibilities and liability and in particular to provide further protection from liability to valuers where they have decided not to request an EWS1 form.
30. A response also suggested removing the expectation that a valuation report should record that no cladding appeared to be present, as it would not be normal practice for a valuer to report on the absence of a risk.
31. Some responses indicated that presenting the criteria as a decision tree would help valuers.

RICS response

32. RICS has carefully considered the interaction of this guidance with Red Book Global Standards and UK national supplement, specifically relating to residential mortgage valuation. The extent of inspection expected for residential mortgage valuation is specifically provided for in those standards and they also provide for valuers to take account of RICS guidance on specific areas of valuation, such as this guidance. RICS is satisfied that the guidance does not conflict with Red Book Global Standards or UK national supplement, but must be read in conjunction with those standards. An appendix has been added to the document providing a summary of the relevant valuation standards for ease of reference.
33. RICS is publishing a supplementary technical information paper alongside this guidance on different cladding systems to improve knowledge of valuers and other property professionals, and will consider what additional support and training could be provided. The guidance emphasises the role of professional judgement in applying the criteria, which would include judgement about a valuer's individual professional competence in relation to any particular instruction.
34. The disclaimers suggested in the document are a matter for negotiation between lenders and valuers. The fact that a valuer is following RICS guidance in order to make a decision not to request an EWS1 provides protection against claims of negligence for valuers in that it represents advice about what a reasonably competent professional would do.
35. We have amended the document to remove the suggestion that a reference to the lack of cladding is included in the valuation report. We agree that this would not be in line with normal valuation practice.

36. We have included a decision tree as an appendix in the guidance to provide more support to valuers in using the criteria.

Scope of the guidance

37. Some responses asked why the guidance applied only to residential property, or asked whether mixed use property was also covered. Valuers pointed out that they felt there were similar issues in some commercial and quasi-residential sectors (for example care-homes, social housing, hotels). Other comments included queries about why houses were not included when these could be divided into flats.

38. A number of the responses asked why the guidance considers the presence of cladding but does not consider the risks that have been found arising from failures in the method of construction of some buildings, for example because of missing cavity barriers.

RICS response

39. The guidance applies to residential property as that is where the greatest risk to life exists that may trigger remediation costs affecting value for leasehold owners. For other types of property, like hotels and student accommodation, there would not be the same relationship between leaseholders and building owners that affects the responsibilities and powers to order intrusive inspections. Residential properties in mixed use properties will also be covered by the guidance because if remediation work is needed to the residential component part, this could affect value through cost recovery and the valuer of a residential property within that building will need to consider whether they require an EWS1 Form.

40. A valuation inspection is a limited visual inspection of the outside of the building. Because of this, all mortgage valuations apply existing standards allowing the valuer to make an assumption that the construction of the property is safe unless there are obvious potential hazards. A valuer can see cladding, but would not be able to see whether there are missing cavity barriers or any other hazards in the building. This is clear in the standards that apply to mortgage valuations and we have added an appendix which includes a summary of these assumptions to the guidance for information.

Using information other than EWS1 forms

41. We received a number of comments suggesting that other information could be used by valuers, rather than them requesting EWS1 forms. These suggestions included “a quality fire safety pack signed off by the principal designer and contractor”; information about the make and specification of cladding; or evidence that timber cladding had been treated with a fire retardant. There were also suggestions that valuers should take a more holistic view of the fire safety of the building such as number of exits, fire alarms and whether the building is purpose-built flats or a conversion.

42. Respondents also suggested that valuers should take into account whether a building has a plan for remediation lodged with a government scheme, or where building owners have agreed to pay for remediation and works have begun.

RICS response

43. Valuers can take other information into account, but industry experience has demonstrated that the information available is often incorrect, insufficient or not available. Valuers are not fire safety experts and a valuation is not a holistic fire safety assessment, as this is beyond most valuers' competence and outside their terms of engagement from their lender client. The EWS1 form was developed to ensure that valuation decisions can be informed by competent specialist advice where that advice is needed based on obvious potential hazards arising from an external wall system.
44. The draft guidance highlighted that valuers could take routes to remediation already agreed into account. We have amended the guidance to include government funding as a possible route to remediation.

Details of criteria – height

45. Responses asked for more clarity about what constituted a storey, whether these included storeys used for commercial purposes or parking, and how valuers should assess buildings where different parts had different numbers of storeys in relation to the guidance criteria.
46. Some respondents felt that using numbers of storeys was too simplistic. Some suggested we should use measurements – particularly to identify buildings over 18 metres. Others felt that more judgement-based criteria should be in place, including looking at the number of flats and whether there are good, defined and observable fire safety controls in place.
47. We had a wide range of responses to our questions about the number of storeys that should form the boundaries of the different risk criteria. Many leaseholders felt that the highest risk category, in which an EWS1 should be required if there is any cladding or balconies with combustible material, should start at ten storeys or more, and that no building under six storeys should need an EWS1. Others questioned why five and six storey buildings were treated as riskier than buildings of four storeys or fewer. However, some building owners and professional respondents felt that buildings below six storeys had substantial risks. Some reported that buildings of four storeys could have significant remediation costs.

RICS response

48. We agree with the comments that we should provide more clarity about what we mean by a storey, and have provided an additional definition in the glossary.

49. We accept that these are broad risk-based criteria. However, they reflect what can reasonably be applied in the course of a mortgage valuation inspection in line with the terms of engagement and standards that apply, and within the competence that most valuers have. Mortgage valuation inspections are limited visual inspections. We consider that a number of storeys is a good workable proxy for the height of buildings. However, we have added a reminder to the guidance that the criteria need to be applied using professional judgement. For example, if a six-storey building is unusually tall because, for example, of commercial use of the ground floor storey, the valuer can take that into account in applying the criteria. It is also important that valuers remain within their competence. A mortgage valuation is not a judgement-based fire risk assessment and valuers would not usually be qualified, nor instructed, to carry out this sort of assessment. Also, while holistic fire risk assessment is important, government advice is that some types of cladding must be replaced.
50. Some of the suggestions that buildings should never require an EWS1 form, while understandable given the consequences for individuals, do not reflect current government guidance on when cladding should be remediated and could inappropriately shift risks on to prospective buyers. The guidance reflects current industry and government thinking about risks of buildings of different heights, both above and below six storeys, and provides pragmatic advice about buildings that are at a lower risk of needing remediation work because of their height and cladding and balcony types. We recognise that some other defects that may require remediation work may also be present in buildings but not visible to valuers, but this is true of any mortgage valuation.

Details of criteria – types and amount of cladding

51. We had a number of suggestions about amending the definition of cladding. The IFE suggested that the definition should be narrowed to say that cladding is anything other than a masonry cavity wall (double skin masonry) or full depth masonry.
52. A number of others commented on specific types of cladding and thought that the definition should be amended depending on whether these presented a fire risk. We have been asked to clarify why curtain wall glazing is included on buildings over six storeys.
53. We asked specifically whether high pressure laminate (HPL) cladding should be included in the types of cladding that mean that an EWS1 should be requested if it is present in any amount and in any height of building. Many respondents did not know because they did not have the technical expertise. However, among professional and fire safety respondents who were able to give a view, the majority thought that this should be added because some types of HPL cladding present a very high fire risk, and would consequently need remediation.
54. We received a number of comments about the amount of cladding on buildings that should lead to an EWS1 form being requested. Some respondents thought that there should be a tapering allowance for cladding on buildings over six storeys with some cladding not requiring an EWS1

on buildings at the bottom of that range. Other respondents thought that on five to six storey buildings, a significant amount of cladding should be 50%, or 40%, or 20% of the surface.

- 55.** A number of respondents asked us to be clearer about what a quarter of the façade meant and whether it included windows, and how this related to limitations on valuation inspections. Others, including the IFE, pointed out that the position of partial cladding in relation to means of escape and whether it linked multiple floors of the building was relevant to risk.
- 56.** For buildings of four storeys or below, some respondents thought that the presence of ACM or MCM should never require an EWS1. Others thought that there should be a percentage threshold so that a small amount of ACM or MCM did not require an EWS1. Many leaseholders were also concerned that valuers would simply ask for an EWS1 rather than making enquiries about whether metal panel cladding was ACM or MCM, and suggested that this should be an option only if the information could not be obtained.

RICS response

- 57.** We respect the view of the IFE and continue to work with them to ensure that the guidance continues to reflect government advice and the views of fire engineers. However the guidance is valuation advice, not fire safety advice. Amending the definition of cladding as suggested would bring huge numbers of buildings within scope of the EWS1 in situations in which there was no obvious potential hazard. This is because there is no way for a valuer on a visual inspection to identify, for example, which timber frame masonry-clad buildings might not have been constructed safely. The guidance reflects existing government guidance and the scope of a mortgage valuation inspection, as set out above.
- 58.** We appreciate that different types of cladding and different types of insulation will present very different risks of fire. Some will need to be remediated and some will not. However, it is unlikely that most valuers, even with the information provided in the *Cladding for surveyors* supplementary information paper (which we are publishing alongside the guidance) will be able to accurately identify which type of cladding is being used based on a visual inspection. Our criteria are therefore broad and risk based, particularly for higher rise buildings where the risk is greater.
- 59.** Curtain wall glazing, while not generally combustible on the surface (glass and aluminium framing or composite glazed units) has been included because it has a reputation for poor fire stopping behind it, at floor level and compartment wall junctions. On a building of 18 metres or higher that is regarded in particular as a life safety issue needing remediation and, because curtain wall glazing is visible to a valuer, we consider an EWS1 should be requested to properly investigate this possibility.
- 60.** We have carefully considered the views of those with fire safety experience on HPL and have decided that the criteria should include this type of cladding as something that should require

an EWS1 if present in any amount on any height of building. We recognise that this will bring more lower rise buildings into scope of needing an EWS1 and the disappointment this will cause leaseholders in those buildings, but given the high risk of fire spread from certain types of HPL and the likelihood that it would need to be remediated on any height of building, we believe that not to include it would move unacceptable risks on to lenders and prospective buyers.

61. There is no clear data on the proportion of cladding on a building that is likely to lead to high remediation costs. As set out in our consultation document, our proposals are based on a common sense view about what might reasonably affect value. For buildings over six storeys, government advice is likely to mean that all cladding needs to be investigated and could require remediation. For five and six storey buildings we did not receive any compelling evidence during the consultation that one quarter was not a reasonable proportion to base this judgement on.
62. We have amended the way that one quarter of the surface is described in the guidance to make it clear that this is one quarter of the whole elevation estimated from what is visible standing at ground level. The elevation of a building includes windows and doors. We have also included a reminder that a valuer needs to use professional judgement in assessing whether an amount of cladding is significant, and that cladding around a sole means of escape or which links multiple floors is more likely to need remediation. The limits of valuation inspection and how this affects a valuation report is covered in the relevant valuation standards, which valuers should be following alongside this guidance.
63. Government guidance is clear that certain types of ACM and MCM on buildings of any height requires urgent remediation. Based on evidence from the consultation we believe that is also true of some types of HPL. We could not therefore agree that there should be a proportion of ACM, MCM or HPL which did not need an EWS1 form. We did however amend the guidance to make clear that an EWS1 should be requested only if a building owner or manager did not provide information about whether metal panel cladding was ACM or MCM.

Details of criteria – balconies

64. We received a number of comments asking for clarification about what balconies stacking vertically means – for example whether balconies that are vertically above each other but not on every floor of the building are stacked.
65. We also received some comments from fire safety professionals about case study 4 and the fact that the timber cladding directly connecting the timber decking of the balconies in the study would be considered by them to be a high fire risk, which would require remediation of the decking and cladding.

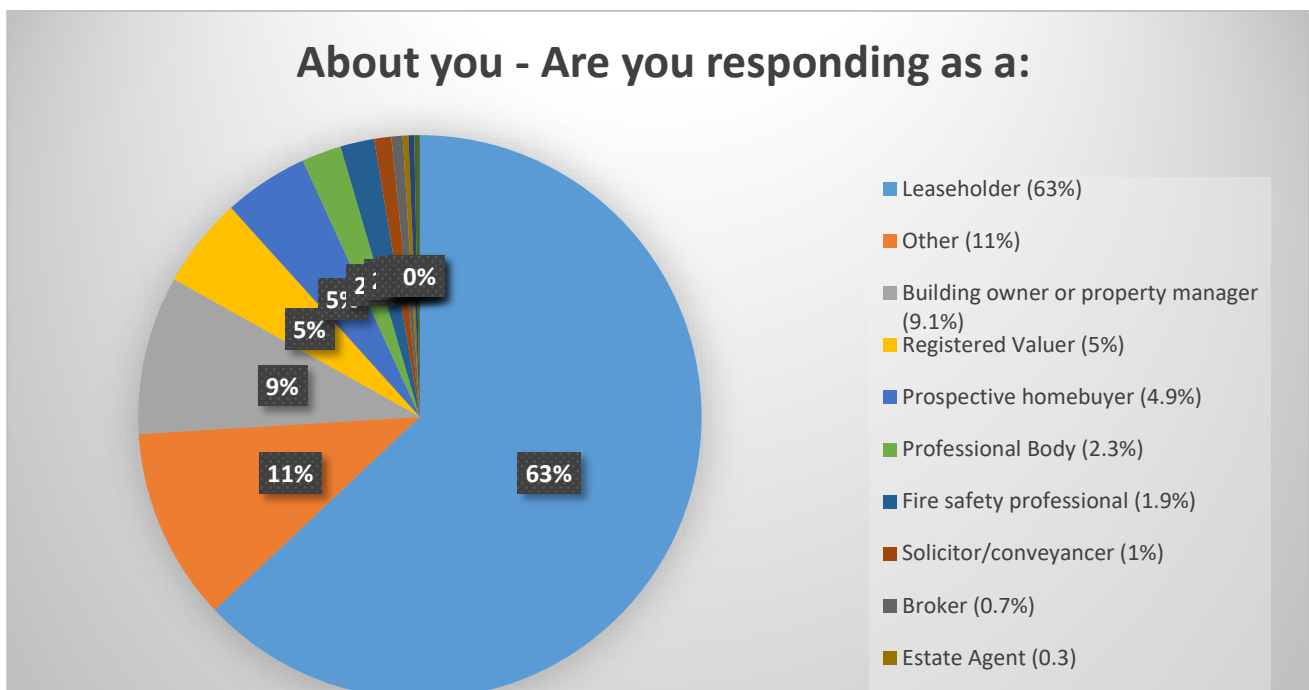
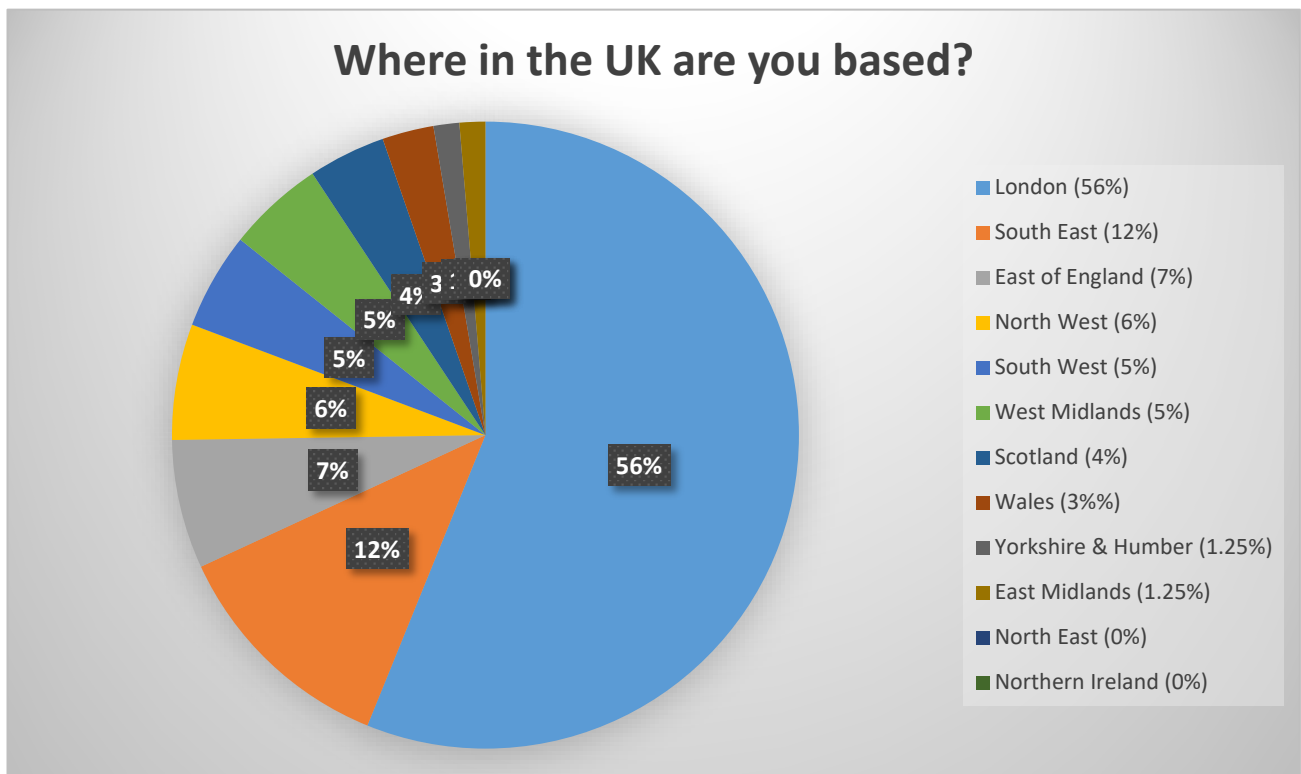
RICS response

- 66.** There is ongoing industry debate about the risks around fire propagation around balconies. We therefore believe that this is not an area where valuers should be asked to make a judgement call about what may be safe gaps between balconies, and that the description used, together with the case studies, is the only appropriate guidance we can currently give.
- 67.** We have amended the criteria for balconies to include those with timber decking where the balconies are directly connected by combustible material. We again recognise that this will bring more buildings within scope and we have amended case study 4 to reflect this. We understand and regret that this will disappoint a number of leaseholders, but we believe that not making this change could move risk inappropriately to lenders and prospective buyers.

Conclusion

- 68.** We are grateful to all those leaseholders, prospective buyers, building owners and managers, professional bodies, RICS members, fire safety professionals, insurers, lenders and other professionals involved in the property market who responded to the consultation for their feedback and insight on the proposed guidance.
- 69.** Given the number of comments received this document is inevitably a brief summary of the main points. However, all the comments received were considered carefully by RICS. The feedback also included helpful information about the broader EWS1 and homebuying process, and the availability of professional indemnity insurance, which we are considering and discussing with other stakeholders but which was not in scope for the consultation on the guidance.
- 70.** We recognise that leaseholders in particular are suffering terrible consequences because of the current uncertainty around the remediation of buildings. We have taken the feedback that leaseholders shared with us very seriously, and tried as much as possible to create clarity about when a valuer should not need to require an EWS1 form, while accepting that valuers have an obligation to lenders and prospective buyers to use professional judgement and not expose them to obvious potential hazards that have not been investigated.
- 71.** RICS continues to work with government, lenders, insurers, RICS members and firms and the fire safety industry to alleviate the difficulties for leaseholders, create certainty and provide the expertise needed to ensure buildings are safe and leaseholders and buyers can buy, sell and remortgage properties.

Appendix A: Analysis of responses to consultation on the guidance



	Yes	No	Somewhat / Partially / Not Sure
Do you agree with the definition of cladding in the guidance, and with the list of construction methods where an EWS1 is not likely to be required?	59%	11%	30%
Do you agree that residential buildings over six storeys should require an EWS1 if they have any cladding as defined in the guidance?	50%	14%	36%
Do you agree that residential buildings over six storeys should require an EWS1 if they have vertically stacking balconies where balustrades and decking are constructed of combustible materials?	51%	19%	30%
Do you agree that residential buildings of five or six storeys are likely to require remediation work that would affect value if they have any type of cladding?	40%	38%	22%
Do you agree that if more than approximately a quarter of the surface of a five or six storey residential building has cladding of any type as defined in the guidance this is likely to result in remediation work that would affect value?	29%	36%	35%
Do you agree that vertically stacking balconies in residential buildings of five or six storeys where balustrades and decking are constructed with combustible materials are likely to result in the need for remediation work that would affect value?	47%	20%	33%
Do you agree that residential buildings of four storeys or fewer have a lower risk of needing expensive cladding remediation work that could affect value?	75%	15%	10%
Do you agree that residential buildings of four storeys or fewer should need an EWS1 form if they appear to have any ACM or MCM cladding?	34%	49%	17%
Do you agree that four storeys is the correct upper limit for this lowest risk category?	45%	38%	17%
Would the guidance help you to understand whether an EWS1 form is likely to be needed by a valuer for your building?	62%	9%	29%
Would the guidance help you to make more consistent decisions about when an EWS1 form should be requested?	58%	5%	37%
Are the criteria set out in the document clear and easy to understand?	48%	15%	37%
Given that a valuer will not know whether a building will need expensive remediation work without an EWS1 form, do you agree that the criteria set an acceptable level of risk for when a valuer can make an assumption about this without asking for an EWS1?	47%	24%	29%

	Yes/Included	No/Excluded	Not sure
Should HPL panels of any type be included or excluded from our Guidance Note as triggering the need for an EWS1 form in any amount for residential buildings under six storeys?	23%	20%	57%
Should HPL panels of any type be included or excluded from our Guidance Note as triggering the need for an EWS1 form in any amount for residential buildings under six storeys? <i>Responses from all except those from leaseholders and prospective buyers</i>	45%	10%	45%