

Unintended Consequences of Post-Grenfell Fire Safety Reforms in the UK

Michael Kinsey and Harry McDaid of Ashton Fire, Richard Goodwin of Olympian Homes and Adam Crabtree of RG Group discuss some of the unintended consequences of recent changes in legislation under the Building Safety Act.

Introduction

The Grenfell Tower tragedy of 2017 stands as one of the most profound catalysts in recent times, for change in the United Kingdom's approach to fire design guidance and building safety regulations. This devastating event, which claimed 72 lives, fundamentally transformed the landscape of fire and general building safety, particularly in the context of high-rise residential dwellings [1]. The subsequent reforms in the UK, while implemented with the good intention of preventing future catastrophes by instigating fundamental changes in the way buildings are designed, these have generated an intricate web of unintended consequences that the authors of this paper wish to highlight and discuss within the fire engineering discipline and further into the wider construction industry. These changes have affected a broad range of aspects from initial design concepts to final building delivery. The regulations have created new challenges that many industry professionals are still struggling to navigate effectively, with many changes viewed as hasty governmental responses implemented without proper consideration of their practical implications.

One of the most significant changes has been the introduction of the Building Safety Act [2] which comprises a comprehensive new regulatory framework that requires mandatory sign-off of virtually all design before commencement and then at completion, registration of high-rise residential buildings before they can be occupied. The Building Safety Regulator (BSR) has been established to oversee the process as a division of the Health and Safety Executive (HSE) and who has a range of oversight roles in the building design process which perhaps most notably includes a compliance approvals process for higher-risk buildings for any new residential dwelling which is 18m or greater in height.

There are many positive outcomes immediately apparent from the BSA that are widely supported by industry including:

- Increased scrutiny of design documentation has led to more comprehensive and detailed initial planning.
- Standardisation of certain processes has improved consistency across different projects.
- Emphasis on detailed documentation has created better audit trails for design decisions.
- Reduced “over collaboration” where design teams may treat approving authorities as an extension of the design team for developing design solutions.
- The new compulsory assessment of competency ensures those qualified make the decisions.
- Ownership of decisions are defined instead of being nebulous.
- Rationalisation of the design and build procurement route has occurred.
- A more robust and independent inspection regime has been put in place.
- Bringing the owner/operators further forward in the design process so their (new) obligations to operate buildings safely pass through the design.

These improvements represent meaningful steps forward in building safety governance. However, beneath these process level improvements lies a more complex reality. The new system has inadvertently created several challenges for fire engineers, the wider design teams they support as well as contractors, clients and developers. These difficulties potentially undermine the system's own objectives which are now causing a serious detrimental impact on the whole sector and to the wider economy, some of which are discussed below.

The Compression Effect on Design Phases

The introduction of the Gateway procedure as part of the BSR approvals process has introduced three mandatory review points (Gateway 1-3) during the design, construction and completion of high-risk residential buildings, requiring duty holders to demonstrate compliance with building regulations and safety requirements. Gateway 1 has been in place for some time and has become integral to the planning process and so is beyond the scope of this paper.

Gateway 2 particularly has introduced a significant shift in project timelines, specifically relating to the 12-week review period the BSR has been provided with under the legislation during which time, construction cannot commence until formal approval that the design has been demonstrated to comply with the building regulations has been provided. This represents a fundamental change from traditional approaches such as "Design and Build" where design development could continue concurrently with construction activities in liaison with building control. Unfortunately, given the reluctance and inability for communication between design teams and the BSR, the 12-week BSR review period has proven to be

aspirational at best with applications taking on average 34% longer (16.3 weeks) than the 12 weeks stated by the BSR and many taking considerably longer [4]. Whilst recently the BSR have admitted these delays and promised further resources to rectify the issue, it is unclear if this will address the actual root cause of the delays.

In response to the more demanding BSR submission requirements, it has been observed in the industry that some clients and developers, to maintain project viability are adopting strategies to minimize perceived impacts on project delivery schedules and costs. A primary concern is, when faced with these more rigorous submission requirements, developers and clients have been tempted to maintain or even shorten their original project design timelines, effectively squeezing the design development phase to absorb the additional burden of the regulatory process. This approach can lead to rushed decision-making, where design teams are pressured to make critical safety choices without adequate time for thorough analysis or consideration of alternatives. The resulting time pressure may force professionals to default to overly conservative solutions or, more worryingly, lead to oversight of crucial safety considerations in the rush to meet submission deadlines.

The compression of timelines is particularly problematic given the new accountability framework. Design team members, now required to have specific defined responsibility through individual accountability, may find themselves in an untenable position - caught between their professional obligations and the practical constraints of compressed schedules. This tension could lead to uncomfortable compromises, where professionals must choose between meeting developer/client-imposed deadlines and maintaining the thoroughness required for proper safety considerations. Moreover, the reduced timeframes for design development may lead to a more fragmented approach to the development of fire and other safety strategies. Rather than allowing time for integrated design solutions that holistically address safety concerns, compressed schedules might result in piecemeal approaches where safety measures are retrofitted into designs rather than being fundamentally integrated from the outset.

Even in cases where the front-end design process is properly funded and allowed to run its full course, similar pressures may instead be transferred to contractors through demands to compress the construction programme, potentially compromising quality and safety outcomes at the Gateway 3 stage.

These time pressures and uncertainties could ultimately undermine the BSR process's core objective of enhancing building safety, creating a compliance-focused exercise rather than fostering genuine safety improvements. This raises serious questions about whether additional safeguards or guidance might be needed to ensure realistic project timeframes that accommodate both the enhanced submission requirements and proper design development.

Communication Breakdown and Bureaucratic Bottlenecks

Pre-Grenfell, building design approvals involved an ongoing continual process of collaboration through the various design stages between relevant approving stakeholders including the architect, contractor, fire engineer, building control/local authority, and the fire service to name a few. The intention was for these stakeholders to meet during the design process for discussion regarding items such as the proposed fire strategy and specific analysis for a project. Whilst the process wasn't without its faults, this communicative and collaborative process resulted in several benefits during building design including:

- Mitigating design risk, abortive work, and extending design schedules.
- Providing a platform where designers were able to present their solutions for meaningful input/dialogue and approval bodies were able to highlight points for further consideration.
- Dynamic and proportional discussions could take place when previously unknown constraints (design based or site based) were identified.
- Facilitating knowledge sharing/exchange between all parties, enabling those less experienced or those more removed from fire safety to gain a clearer understanding of complex safety and design requirements, thereby enhancing overall project competency and efficiency.
- Promoting discussions associated with opportunities for innovation in building design using the latest research and real-world challenges in the context of existing fire design guidance which may contain limited associated information.
- Allowing for discussions regarding clarification of interpretation of fire design guidance or where it is limited, agree on approaches to address.

The BSR approvals process has effectively dismantled these traditional channels of dynamic/interactive communication between stakeholders in the approval process with more rigid and formalised outcomes. In the summer of 2024, the BSR issued a statement that, despite the challenges and issues that the BSR was experiencing and the delays this was causing, it would still not assist applicants by issuing advice or guidance on how to present applications nor what to

include to demonstrate compliance with the building regulations. This preclusion of direct engagement was based upon a perception that under the old regime Building Control was “marking their own homework” - telling people what to do and then auditing it – in essence they were being relied upon as a design expert, which the BSR wanted to cease.

The communication breakdown has been compounded by the BSR facing severe resource constraints and significantly underestimated both the scale of the expertise needed to fulfil their obligations which has forced them to seek qualified personnel from an already constrained market [6]. The BSR has publicly disclosed that they were unable to directly employ essential technical staff - such as fire engineers or registered building inspectors—and instead had to outsource each application review to bespoke Multi-Disciplinary Teams (MDTs) on a consultancy basis. The assembly of these teams has proved challenging, given the limited capacity in both the private sector and local authority building control. The BSR has admitted that this outsourcing model is the primary cause of approval delays, with up to a month being spent merely coordinating individual teams before application review can even commence. Furthermore, there appears to be significant inconsistency in the MDTs' approach and understanding of their remit. From the limited responses received regarding new-build HRBs, which are being circulated throughout the industry in lieu of normal consultation, it is evident that the teams' reviews extend well beyond their intended scope. Rather than focusing on verifying regulatory compliance, the MDTs are conducting comprehensive peer reviews of detailed designs. Their commentary frequently ventures into design issues far beyond compliance matters, inadvertently exposing the BSR to direct design responsibility - a scope far exceeding their intended regulatory guidance role. This expansion of scope directly contradicts the BSR's intended regulatory function.

This transformation in approach of reduced communication is particularly counterintuitive for buildings designated as "higher risk," where one might expect increased rather than decreased stakeholder engagement. The lack of readily available communication channels has the potential to create several significant issues. The absence of preliminary discussions with relevant stakeholders in the approvals process can lead to misunderstandings or differing opinions regarding interpretation of fire design guidance and submission, with procedural queries that could have been easily resolved through initial dialogue. The reliance on formal comment and response-forms after a detailed design is submitted, while intended to create clear documentation trails, may result in protracted back-and-forth exchanges that could have been resolved quickly through direct discussion during the detailed design process. Applicants complain that this lack of engagement has left many in the dark as to what information will be required to get through the Gateway checks, with applications then more likely to get rejected. Developers are also complaining that they have had projects rejected with very little feedback, and then they have had to go to the back of the queue.

This communication vacuum can create situations where mistakes and oversights are more likely to occur and harder to identify early. When issues are eventually identified, the formal nature of the BSR submission process makes them more time-consuming and costly to address. The inability to engage in collaborative dialogue with the BSR and fire service could be argued has reduced the industry's capacity to develop innovative solutions to complex design challenges and increased potential for adopting overly conservative approaches.

Building safety and fire engineering design is inherently complex, relying on advanced calculations, specialized knowledge, and nuanced interpretations of guidance and regulations. This complexity often places it beyond the understanding of those without technical expertise in the field. Consequently, there is a heightened need for clear and consistent communication during the approvals process to bridge the gap between fire engineers and other stakeholders, including approving authorities and the fire service. By prioritizing open and constructive dialogue during the approvals process supporting consensus of interpretation of fire design guidance and process, the industry can enhance not only the approval process itself but also the overall quality of fire safety designs.

The Paradox of Increased Documentation and Reduced Scrutiny

The BSR approvals process presents a concerning paradox where the increased volume and detail of documentation required to be produced may be contributing to a higher risk of mistakes and oversights. The sheer magnitude of information required for submissions, combined with potential compressed design timelines previously mentioned, creates a potential environment where critical details can be missed or misinterpreted. While the system demands more comprehensive documentation than ever before, the ability to thoroughly review and validate this information has the potential to become increasingly challenging.

Following the highly publicised Public Inquiry into the Grenfell Fire, where almost all those involved in the design team were heavily criticised, and with impending associated legal cases looming, there is a growing sense of unease among design professionals. The role of Principal Designer, as defined in the BSA, requires considerably enhanced level of responsibility whereby design teams are demanding increasing involvement from mechanical engineers, electrical engineers and fire engineers regarding a wider range of topics in more detail. As part of this, for example, many design teams are sending increasing amounts of detailed design drawings/documentation to fire engineers under the expectation that they have the responsibility and competence to review such information. This fails to recognise that the key role of a fire engineer in the building design process is to develop a fire strategy which defines key principles and

requirements to meet the building regulations and advise design team members to interpret such requirements. This strategic-level information is to be used by other design team members / the Principal Designer to develop a design. Many fire engineers themselves do not possess the expertise, experience or skills needed to design in detail such systems/aspects of design, so are ill-equipped to review or comment on the suitability of a given detailed design element or identify all but the most obvious of issues in them.

These issues create an increased pressure where fire engineers are not only expected to review documentation associated with an ever-expanding scope of design features, respond to an increasing number of design queries in more detail, but also shoulder greater professional risk - potentially with limited corresponding commensurate increases in fees or time provided. The combination of these issues, alongside the heightened scrutiny and legal exposure, creates a perfect storm potentially undermining the fundamental goals of the regulatory reforms.

Over-reliance on Guidance-based Designs

One of the recommendations of Dame Judith Hackitt's report "Building a Safer Future" [3] was for a new framework to retain an 'outcome-based' approach for the industry rather than defaulting to prescriptive regulatory requirements. The 'outcome-based' approach provides the necessary flexibility for addressing building work on a case-by-case basis - a crucial consideration for higher-risk residential buildings, which often require bespoke solutions due to their inherent complexity. Furthermore, this framework was designed to foster innovation within safe parameters and enhancing productivity. Despite this, the report identified a concerning trend: the Approved Documents, intended as guidance, had effectively transformed an outcome-based regulatory system into one that practitioners often interpreted as mandatory regulatory prescription. This observation highlighted a fundamental disconnect between the intended flexibility of building regulations and their practical application in the field.

To mitigate these risks, meaningful engagement between the BSR and design teams - particularly the fire engineers is essential. This collaborative approach ensures that any bespoke or innovative solutions proposed are thoroughly understood, appropriately assessed, and effectively implemented. It also facilitates a shared understanding of the design intent, promoting a more cohesive approach to achieving the required safety outcomes. Such engagement aligns with the principles set out in Dame Judith Hackitt's report, emphasizing the importance of a robust competence regime and communication framework to uphold safety standards while enabling flexibility and innovation in building design. This highlights that competency underpins the effectiveness of regulatory changes, encompassing both design team, fire engineering and BSR approval staff. Regardless of future qualification, certification, or experience criteria, it must be acknowledged that the many elements, but specifically fire engineering, in the building design process are complex and human error remains inevitable and interpretations of guidance for fire design and other life safety systems will vary amongst professionals. While meeting competency requirements bolsters confidence in a design team capability, it does not guarantee infallibility.

Recent observations of BSR Gateway 2 responses for submitted schemes reveal a concerning tendency to treat guidance as mandatory requirements rather than a tool for achieving compliance with broader regulatory objectives, which may be used simply to ensure that the application goes through the BSR as quickly as possible. This approach undermines the outcome-based framework advocated in Dame Judith Hackitt's report, which emphasizes flexibility and the need to evaluate designs holistically from first principles. By focusing narrowly on adherence to specific prescriptive elements of guidance, the opportunity to assess the overall safety strategy in its entirety can be lost. This can stifle innovation and lead to overly rigid interpretations that may not be suitable for complex or bespoke projects. A shift towards genuinely understanding and appraising fire safety designs against the intended outcomes, rather than ticking boxes against prescriptive criteria, is critical for aligning practice with the principles of the new regulatory framework. Such a change would enhance collaboration, improve trust between stakeholders, and ultimately ensure that safety remains the primary focus.

Regulatory Requirements Undermining Development Economics & Construction Change

The BSA Gateway system, particularly Gateway 2, has fundamentally transformed traditional development economics by requiring extensive upfront investment and early engagement across the project team. Following planning approval on large schemes, which can already incur costs of millions of pounds and extend time, developers must invest further considerable sums to complete RIBA Stage 4/5 to ensure compliance – often before securing site acquisition and funding. This dramatic front-loading of costs, often under speculative risk, could mean projects don't go forward when otherwise they would be perfectly viable.

Competitive tension in procurement is also eliminated whilst straining industry-wide resources. Contractors and consultants are increasingly being asked to financially underwrite and/or cashflow substantial portions of the design

phase before full engagement and project funding is secured. This creates commercial pressure across the entire consultancy supply chain.

The speculative nature of this investment, combined with limited control over Gateway timelines, creates significant commercial risk, especially as development funding agreements maintain rigid delivery penalties.

Gateway 3 - Integration of the BSA into the Procurement and Construction Processes

The commercial implications as aforementioned extend still further into the construction pathway with Gateway 3 presenting perhaps the most critical challenge to project viability. This final compliance checkpoint occurs at a time of maximum financial exposure, when development costs peak but before any income can be generated through occupation. Given the uncertainty and delays already experienced at Gateway 2 (which at least can be ameliorated to some extent by delaying execution of the various funding and construction contracts) this is not the case for Gateway 3 whereby these agreements are already in existence and so need drafting to capture what remains as being extensive on-going uncertainty. This additional timing extends the period during which developers must service debt without offsetting income, creating considerable financial strain and potentially deterring investment in otherwise viable developments.

The concept of Practical Completion as is usually administered through standard forms of building contract has become largely obsolete in its current form for buildings captured by the BSA. In the 2024 suite of JCT contract revisions, the BSA is captured only in part, but the standard forms do nothing to introduce a contractual framework that deals with the requirements of Gateway 3 at Practical Completion. This needs to be agreed by the parties on an individual contract basis via Amendments.

Notwithstanding that Practical Completion can be delayed by up to 8 weeks in any instance when there should be no need for this to be the case, the difficulty in defining the risk of delay to Practical Completion beyond this period (now predicated upon the receipt of Gateway 3) adds additional burden on the parties simply relating to the performance of the BSR in discharging their obligations within the statutory period. If delayed this could impact significantly on any Development Finance Agreement and the Building Contract. In other words, if a delay does occur, inevitably a dispute will arise as to its cause - is it information quality or procedural adherence at the risk of the contractor or is it BSR resource or skill and care at the risk of the Developer Client? The BSR may well become embroiled within these disputes. For example, a developer (or contractor) that misses an academic year on a purpose-built student accommodation block because the BSR has under resourced their involvement and has maybe taken 12 weeks instead of 8 could face an existential threat to their very existence given the damages they may have to bear.

The early detailed design submission required within Gateway 2 presents additional challenges during the construction phase up to Gateway 3 which make design changes inevitable during the build. While the legislation specifies timelines for determining major and notifiable changes, industry uncertainty about the administration of these changes and how this will impact upon building control sign off at Gateway 3 could significantly impact contractors' ability to maintain programme schedules. The system's rigidity is creating heightened tension which are inherently punitive regarding programme delays. The potential for untimely implementation of legislative requirements within change control and Gateway 3 significantly increases the risk of disputes between clients and contractors. While both parties attempt to balance these risks, significant time losses and inability to occupy buildings which could result in untenable financial implications. This situation could lead to either significant disputes or business failure, with the BSRs performance here too becoming a catalyst for industry conflict and threats to business solvency.

Further delay to occupation is also inherently built into the system whereby following receipt of Gateway 3, the registration of the building itself then must occur as a separate consecutive task before final occupation. This adds a further period of delay to occupation that presents an additional insurance risk to the unoccupied building that usually, the contractor maintains even though at Gateway 3 PC has been achieved. There should be no reason why both Gateway 3 and Registration milestones should be reached at the same time.

Government's Response to the Grenfell Inquiry

Most recently, the UK Government's response to the Grenfell Tower Inquiry Phase 2 Report, which in essence accepts all 58 of its recommendations, outlines numerous further reforms relating to fire design guidance, education, HSE organisational changes, and the definition of "higher risk" buildings - to name but a few.

A new Super Regulator has been proposed, to be in place by 2028, that in the intervening period could introduce even further uncertainty on top of that already in existence. How the BSR's role will be subsumed or even changed has not been made clear. Additionally, a new licencing system is also proposed for any contractor undertaking an HRB.

Whilst these responses are encouraging, they involve considerable further tiers of regulatory reform imposed on a sector already coming to terms with a paradigm shift in construction delivery processes and procedures still being implemented under the Building Safety Act. Too much radical change, or at least change at the pace recommended, could create further uncertainty throughout the property sector, which is already overwhelmed at a time when the Government is seeking to deliver on its housing and economic growth targets.

In the Government statement there was also no mention of any commitment to address the immediate issues discussed in this article regarding the design approvals process, inefficiencies in the Gateway protocols and the performance of the BSR. Indeed, the responses prioritised further consultation and review over more timely decisive action, again something that seems in total contradiction to the Governments wider economic aims.

Conclusions

The transformation of building design approvals through the BSR represents a well-intentioned shift aimed at preventing future fire tragedies. It is suggested that whilst there is broad support for the fundamental objectives of the new regime in industry, including the requirements for more comprehensive design completion prior to construction and demonstrated competency, the implementation has generated significant challenges for design teams. Crucially, it's important to emphasise that the issues and concerns highlighted in this article lie not with the underlying intent or motivations of the system, but rather with its practical implementation and operational effectiveness. The consensus is that the current process requires refinement to achieve its intended outcomes.

It is argued that the current system, rather than simply enhancing safety, has introduced new risks and complications that warrant serious consideration and need for dialogue in the industry. The requirement for more detailed design work and expanded fire engineering and life safety systems scope in compressed time frames largely influenced by extended approval periods and reduced approving stakeholder engagement has the potential to undermine its very objectives. The addition of layers of bureaucratic/regulatory oversight and over reliance treating guidance as being regulatorily mandated, while creating the appearance of enhanced safety, may divert attention and resources from more substantive safety improvements. As highlighted in the Hackett report, the Grenfell tragedy itself demonstrated that documented compliance with design guidance and regulation alone does not guarantee safety: effective implementation, enforcement, and ongoing management are equally crucial.

Whilst the BSR has made efforts to establish its operational framework, several challenges have emerged in meeting industry needs under the new regulatory regime. The organisation has faced significant resourcing difficulties, particularly in securing staff with requisite expertise. There appears to be some mission drift, where the BSR's involvement has extended beyond its core remit of verifying regulatory compliance and into potential areas of design responsibility. However, paradoxically, the BSR has been reluctant to engage in preliminary discussions that might guide applicants on submission requirements. This limited communication has led to situations where applications are deemed inadequate, when such issues might have been readily resolved through constructive pre-submission engagement. These challenges are compounded by the low proportion of total BSR Gateway 2 applications which have been approved currently being at around 15% [4]. Whilst it has been reported that the standards and level of information has been insufficient in some applications [5], it is proposed the approval rate is at least in-part caused by the above challenges associated with the approvals/engagement process itself.

Looking forward, it becomes clear that the industry needs to find a better balance between regulatory oversight and practical implementation. This might involve a range of measures including the following:

- The creation of improved two-way/readily accessible communication channels that allow for continual stakeholder engagement with design teams, the BSR and the fire service while maintaining robust oversight during the pre-planning, planning, and design process.
- A reconsideration of the current timelines of the approval process to better align with practical design development needs.
- A renewed emphasis on the distinction between fire design guidance and functional regulatory requirements, ensuring designs have a sufficient level of safety whilst simultaneously balancing other design objectives, rather than pursuing safety in isolation which can lead to excessively conservative measures and less sustainable designs.
- The definition of competency frameworks operating alongside robust checking systems within the quality assurance process for both fire engineers and other consultant disciplines in design teams and the BSR.
- The formal definition of both the scope and role of Principal Designers and fire engineers within the design process, alongside establishing a clear definition and hierarchy of information for review and in what level of detail. This clarification would help prevent the potential tendency to request involvement from fire engineers and other

consultant disciplines in matters beyond their remit/competency and mitigate erroneous assumptions regarding scope.

- The implementation of a Gateway 2 pre-application period which would trigger the formation of the Multi-Disciplinary Team (MDT), enabling early consultation and interpretation guidance. Following this preliminary phase, the Gateway 2 application would be submitted to an MDT already familiar with the project's particulars, having been engaged during RIBA Stage 3 and having provided specific guidance on building regulation implementation within the project context. The same MDT will then "travel" through the scheme, deal with variations, major changes if any, and any design development, leading up to Gateway 3.
- The establishment of a publicly accessible database similar to local authority planning portals, creating transparency around decisions and enabling the sector to learn from both successful and unsuccessful applications.
- Acknowledging the industry has made significant progress in recent years, with more rigorous fire design guidance such as recommendations for enhanced sprinkler coverage, stricter external wall regulations, additional means of egress provision (e.g. additional stairs, evacuation lifts, etc).

The legacy of the Grenfell tragedy demands substantive improvements to the process by which fire safety is achieved in building design, yet these must be evaluated by their practical outcomes rather than merely the breadth of oversight imposed or the thickness of the associated regulatory framework. A more strategic deployment of governmental resources appears crucial, with enhanced focus needed on existing building stock where inherent fire risks are demonstrably higher, rather than maintaining disproportionate scrutiny of new developments already incorporating comprehensive safety features such as fire compartmentation, sprinklers, advanced egress systems and robust firefighting facilities. Whilst preserving the valuable progress made post-Grenfell remains paramount, the high-rise residential sector faces mounting challenges that extend beyond safety considerations to impact broader economic objectives, including the Government's manifesto commitments to housing delivery and GDP growth-project viability is now being affected by the changes.

The path forward requires a nuanced approach that acknowledges both the merits of previous regulatory practices and current shortcomings, whilst evolving the framework to better serve practical needs. This balanced perspective, combined with the sustained pressure on the property sector and absence of immediate regulatory relief, suggests an inevitable juncture where fundamental reassessment becomes necessary - not to diminish safety standards, but to create more effective, integrated approaches that simultaneously uphold rigorous safety requirements whilst enabling viable development. As the sector approaches this critical point, the focus must shift from layering additional oversight towards implementing more efficient, outcome-focused regulatory processes that demonstrably enhance building safety whilst supporting essential development activity.

References

1. Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Grenfell Tower Inquiry: Phase 2 Report of The Public Inquiry into the Fire at Grenfell Tower On 14 June 2017. Volume 1/Volume 2.
2. Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2022). Building Safety Act 2022.
3. Hackitt, J. (2018). Building a Safer Future - Independent Review of Building Regulations and Fire Safety: Final Report. Ministry of Housing, Communities and Local Government.
4. Project Four (2025). Health and Safety Executive: Freedom of Information Request – BSA Gateway 2 Application Statistics. January 2025
5. FPA Media (2024). Many building applications to new regulator missing basic information. Fire Protection Association. URL: <https://www.thefpa.co.uk/news/many-building-applications-to-new-regulator-missing-basic-information>. Accessed on: 24.01.2025
6. Gardiner, J. (2025). Gateway 2 processing delays caused by outsourced delivery model, admits Building Safety Regulator. Housing Today. February 2025

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