

SAFE AND ABUNDANT REFORMING THE BSR TO SOLVE THE URBAN HOUSING CRISIS



About the YIMBY Initiative

The YIMBY Initiative is a research centre and stakeholder management partner dedicated to creating a UK with abundant housing, clean energy, and modern infrastructure.

We advocate for bold reforms that accelerate development, lower costs, and improve quality of life for all.

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Mike Reader
MP for Northampton South
The Labour Party

At a time when homelessness is rising and temporary accommodation costs are crippling councils; the Building Safety Regulator (BSR) has become one of the biggest blockers to getting Britain building.

I'm embarrassed to say that in year one of this new Labour Government, the pace of resolving this blockage has been glacial. The memory of Grenfell remains front and centre of many politicians' minds and the difficult political decision to change the key regulator brought in after that tragedy seems almost too sensitive to even consider.

Every person in industry I speak to has a solution for getting projects moving through the BSR's gateway process. Fundamental change, like altering rules on height of buildings considered by the BSR, reversing two-staircase requirements, operational changes in the way the BSR operates or bringing more resource into the organisation to break the backlog. There isn't any one perfect answer which will make sure we build the homes we desperately need in our country.

This paper by the YIMBY Initiative provides what I see as practical, deliverable and realistic proposals. Proposals which don't change the level of scrutiny or assurance the BSR provides, but which speed up delivery and make sure that we re-build trust in the development process.

By combining changes to how technology is leveraged with rewarding good performance and delivery, I do believe the recommendations laid out in this report could make a significant dent in the barriers holding up housebuilding.

The Government can't do this alone. The speed needed to implement and assure the proposals in this paper require Government to partner with one of more private sector partners to boost capability, improve agility and leverage international expertise. But by working in partnership with industry can the proposals laid out here be implemented successfully.

Whatever solution the new Secretary of State for Housing Steve Reed chooses to unblock this crisis, I am certain that these proposals go a long way towards providing him with a roadmap and supporting him to delivering on his pledge. Build Baby Build.



Jay Morton

Director, Bell Phillips Architects

Architects Action for Affordable Housing Campaign (AA4AH) Steering Group

Ask any architect how business is going right now and they will not be jumping for joy. The best word to describe the market is “sticky.”

We should all be busy delivering the 1.5 million homes the country needs, but instead the industry is wading through treacle to get projects moving. We are the canaries in the mine. If housing commissions are down today, there will not be completed homes in three years’ time. With that comes a loss of skill and talent at the moment we need resilience in the sector.

That resilience has already been tested for over a decade. The financial crisis of 2008, Brexit, the pandemic, the war in Ukraine, rising energy costs, labour shortages and high interest rates. The Building Safety Regulator is the latest challenge to navigate.

We know why it is needed. Ensuring the competence and skill to deliver safe, good quality buildings is essential. But the process has become the problem. When introduced, the definition of what was required and how it was to be presented was unclear, as design teams scrambled to navigate the new regime. Delays to Gateway 2 were not expected, and the Gateway process has not been aligned with workflows, procurement routes or funding. Submitting all design information in one go at Gateway 2 challenges workflows, especially when the ability to refine designs and change products due to availability later in the process is an important part of delivery, particularly under design and build, a route favoured by housing developers including local authorities. Gateway 2 approvals were meant to take 12 weeks, already difficult in practice, but are stretching in many cases to 25 to 40 weeks and sometimes longer. As stated in this report, 70% of submissions are initially marked invalid or returned for clarification, largely due to documentation issues rather than safety. That figure tells its own story. Everyone is still finding their feet and the process is not working as intended.

The consequences are serious. Delays at Gateway 2 & 3 are now one of the greatest risks facing projects and add nervousness to developers. They drive up costs and undermine viability, which in turn puts quality at risk if the project is built at all. Many schemes are simply sitting on shelves, some indefinitely. Inner city projects where density is key are especially affected, with some developers choosing only to bring forward sites below the HRB threshold of 18 metres to avoid BSR scrutiny. In

some cases, concern about potential delays has led clients to request reduced time at Stage 4, the technical design stage, in order to claw back lost weeks. That is the last thing we should be doing. What the industry needs is more design thinking time, not less. Good design, competent teams and proper resourcing are what truly make buildings safer.

The result of all this is less density, fewer homes, potentially lower quality, and missed opportunities to regenerate our towns and cities. Another casualty is innovation. Faced with the risk of rejection and delay, design teams and clients are defaulting to what has been done before. With climate change and density challenges, we need to be innovating now more than ever.

We all want the same thing. Safe, healthy, aspirational buildings of good quality. Places that people are proud to live in and that will stand the test of time. But legislation urgently needs review. It must align with industry workflows, procurement routes and funding cycles. There is a reason projects are developed in stages, reflected in the RIBA Plan of Work. Submitting a package of information and then waiting months with no communication is not the way to de-risk projects. Lack of dialogue only increases uncertainty.

We need to go back to first principles and ask how do we retain safety and build quality homes? How do we keep projects moving? How do we align regulation with workflows? How do we encourage innovation instead of stifling it? How do we regulate in a way that protects residents while still allowing the sector to grow?

These are the questions this report seeks to answer. Encouragingly, industry and government are starting to have the conversation about change. The recommendations here present a pathway for the BSR to work with industry, remove bottlenecks, and build a system that retains safety while restoring certainty. If we get this right, we can unlock stalled projects, protect innovation, and deliver the safe, joyful homes our communities deserve.



Gareth Bacon MP

Shadow Minister for Housing and Planning, and
Conservative Member of Parliament for Orpington

The operation of the recently created Building Safety Regulator (BSR) is proving to be a major contributor to a malaise that Britain has been suffering from since the turn of the millennium: we struggle to build.

As a nation, we have gone from the marvels of Victorian engineering to watching from afar as other countries clear infrastructure projects with relative ease.

Britain is now constrained within a self-imposed straitjacket of overzealous red tape which prevents much needed development whilst at the same time causing absurd outcomes such as £100 million bat sanctuaries.

Our regulatory obsession must change in order to help fulfil the aspirations of home ownership for millions of our people.

As a former Chairman of the London Fire & Emergency Planning Authority, I walked the ashen halls of Grenfell following the disaster which took so many lives and I saw first-hand the consequences of inadequate safety control. I believe the motivations behind the BSR are understandable and the actions of the previous government in creating it were in this vein.

However, a worthy policy has struggled because the bureaucratic stranglehold was not just allowed to continue, it has been exacerbated. Industry has been left effectively frozen and this has far-reaching consequences. One of my constituency businesses in the construction sector has told me how the Gateway 2 block has impacted their trade and caused redundancies as a result. If we cannot build, we cannot boost economic growth.

Reforming the BSR should not be about making developments less safe – changes must instead tackle the fundamental problem of being process-focused to the point that we fail to deliver.

This is particularly true in places like London, where it has now become very difficult to build anything in. The existing urban environment lends itself to denser developments which are inevitably viewed as higher-risk under the BSR and, therefore, face very lengthy delays and huge additional costs to construction. Consequently, there is a danger that we risk urban sprawl into the countryside and the destruction of swathes of the green belt, with homes forced onto communities with an inability to meet the infrastructure demands of new residents.

While the current Government's New Fast Track Process to help unblock delays is welcome, we must go further. We must change from viewing the problem as simply being about a lack of capacity to a wider culture change on how we do business. In this paper, The YIMBY Initiative presents an excellent analysis of the BSR's day-to-day processes at a granular level and how these details compound into the challenges faced across all three gateways and the golden thread.

As such, they deliver a series of holistic recommendations which aim to address the excessive regulatory burdens placed on industry. This culminates in their novel suggestion of harnessing the potential of the free market and re-envisioning the BSR as a ratings agency to bridge the gap between public and private sectors.

This is the kind of imaginative thinking we need to challenge established orthodoxy, to clear systematic blocks and to help deliver the homes that Britain needs.



Vikki Slade MP
Liberal Democrat MP for North Poole

When we close our front door, we should expect the building we live in to be safe. That is a basic right—not a luxury. Long before the tragic fire at Grenfell Tower, the warning signs around tall buildings were flashing. But it was the loss of 72 lives and the catalogue of systemic failings that rightly forced the Government to act. Grenfell was not just a tragedy—it was a turning point that exposed deep-rooted flaws in oversight, accountability, and the value placed on residents' voices.

In the years since, the UK government and the construction sector have sought to rebuild trust in the safety of our homes. The creation of the Building Safety Regulator (BSR) was a central part of that effort. Its ambition was not only to ensure that all homes are safe, but to restore public confidence in the construction and management of buildings.

At the same time, we face a generational housing crisis. Our population is growing, ageing, and increasingly urban. We need to deliver new homes at pace—not just to meet demand, but to support economic growth and social wellbeing. The shortage of safe, affordable housing is felt most acutely by young families, key workers, and older people—groups whose wellbeing depends on stable, secure homes.

This report looks back at the landscape before Grenfell Tower and examines how the BSR was formed. It also explores how its current structure and processes are falling short of the ambition. It does not question the need for a strong regulator. Quite the opposite, the

authors make the case for robust oversight. But they also show how the current system—dogged by delays, lack of capacity and even a basic lack of digital infrastructure—is paralysing housing delivery at a time when we can least afford it.

This report highlights how a well-intentioned 'safety first' approach has, in practice, led to missed housing targets, stalled regeneration, and ironically, more people living in less safe homes. Its recommendations do not weaken standards but modernise the way the regulator implements them.

The building sector is by its nature innovative. From design and materials to methods of construction, it has the tools to build safer, greener, and more efficient homes. But the regulator has not kept pace. The report proposes practical reforms: digitising submissions, using AI to triage applications, fast-tracking high-compliance developers, and repositioning the regulator as an independent, professional body.

Across the country, sites sit ready for development. Buildings lie half-finished. Funders lose confidence. Children do their homework in temporary housing. The cost of inaction is not just economic—it is human. We cannot allow red tape to hold us back.

Reforming the regulator does not mean cutting corners. It is about modernising and resetting the standards for building safety. This report offers a roadmap to restore trust, unlock growth, and deliver the safe, modern homes our country needs.



Richard Tice MP

Member of Parliament for Boston and
Skegness Deputy Leader, Reform UK

Britain is in the grip of a housing crisis that is robbing millions, especially the young, of the dream of home ownership.

In our cities, the cause is not complicated. We are simply not building enough homes. And the reason for that shortage is clear: red tape and regulatory burdens on hard-working builders. Endless bureaucracy, box-ticking, and delay are suffocating our ability to deliver the homes people need. Whilst we must only build safe buildings, which is now standard, the manner in which these builders are regulated is not sustainable if we want our cities to keep growing in size and pleasantness.

Of course, we must learn the lessons of Grenfell and keep people safe in their homes. But we must also be honest: the Building Safety Regulator, however well-intentioned, has made it harder to build anything at all in our cities. It is slow, confusing, and unaccountable. Instead of working with industry to ensure homes are

safe, it has become yet another obstacle to progress. This is why housing has become scarcer, pricier, and increasingly out of reach.

Reform UK believes in cutting needless regulations and unleashing growth. That means replacing red tape with common sense. We should be making it easier, not harder, for good, responsible developers to get spades in the ground. The proposals in this paper are good examples of how: encouraging competition on safety and speed, deploying cutting-edge technologies like AI to slash delays, and creating White Lists of approved products and processes that give clarity and certainty.

If we are serious about fixing Britain's housing crisis, we must act now. Families deserve secure, affordable homes. Young people deserve a chance to get on the ladder. And Britain deserves a system that builds homes, not paperwork. I welcome this report, and commend its valuable contribution to the debate.

Executive Summary

Grenfell rightly forced a reckoning; what we built instead is a machine for delay. Since the Building Safety Regulator (BSR) came into force in 2023, the UK has tried to deliver absolute safety through absolute process at the worst possible moment for housing supply. The results are visible in our skylines and spreadsheets: London housing starts fell 38% in Q1 2025, and tall-building permissions fell from 21 to 6 between 2023 and 2024. Gateway Two is the choke point. Against a statutory 12-week target, approvals routinely take 25–40 weeks and can drift to 18 months; roughly 70% of submissions are rejected or invalidated. By late 2024, just 14% of Gateway Two applications (146 of 1,018) had cleared, with ~847 marooned in a backlog. Gateway Three, ostensibly the final formality, green-lit 7 of 40 cases last year. This isn't a safety culture; it's systemic non-delivery.

The cause is not the ambition to make buildings safe but the way the BSR tries to achieve it: manual review of thousands of non-searchable PDFs, rotating multi-disciplinary teams that contradict themselves mid-stream, poor and sporadic communications, and an insistence on re-litigating low-risk or already-certified elements. The regulator even blocks piling during Gateway Two, despite no history of high-rise piling failure in the UK or Western Europe. This unpredictability

blows up financing windows, pushes student schemes past intake cycles, and chills innovation, particularly modern methods of construction that rely on volume and standardisation. Construction insolvencies are climbing; in May 2025, 17.2% of all English insolvencies were in construction. By any sensible reading, the BSR is not meeting its Growth Duty under the Deregulation Act 2015: decisions are neither timely nor investment-supportive.

The fixes are practical and immediate: permit piling and concurrent works for already-cleared elements; replace dead PDFs with an electronic, machine-readable submission system; use AI triage to maintain the Golden Thread and issue targeted queries; publish standardised checklists; stabilise teams; enforce service-level agreements; and introduce conditional approvals and paid fast-track lanes. The structural reform is equally clear: reconstitute the BSR as an independent, Fitch or S&P-style safety-ratings authority with permanent expert teams, accreditation for proven applicants and supply chains, and white-lists for MMC systems and common proprietary components. Done properly, this delivers more safety and more homes by turning regulation from a queue into a predictable, professional service that gets safe buildings built.

Introduction

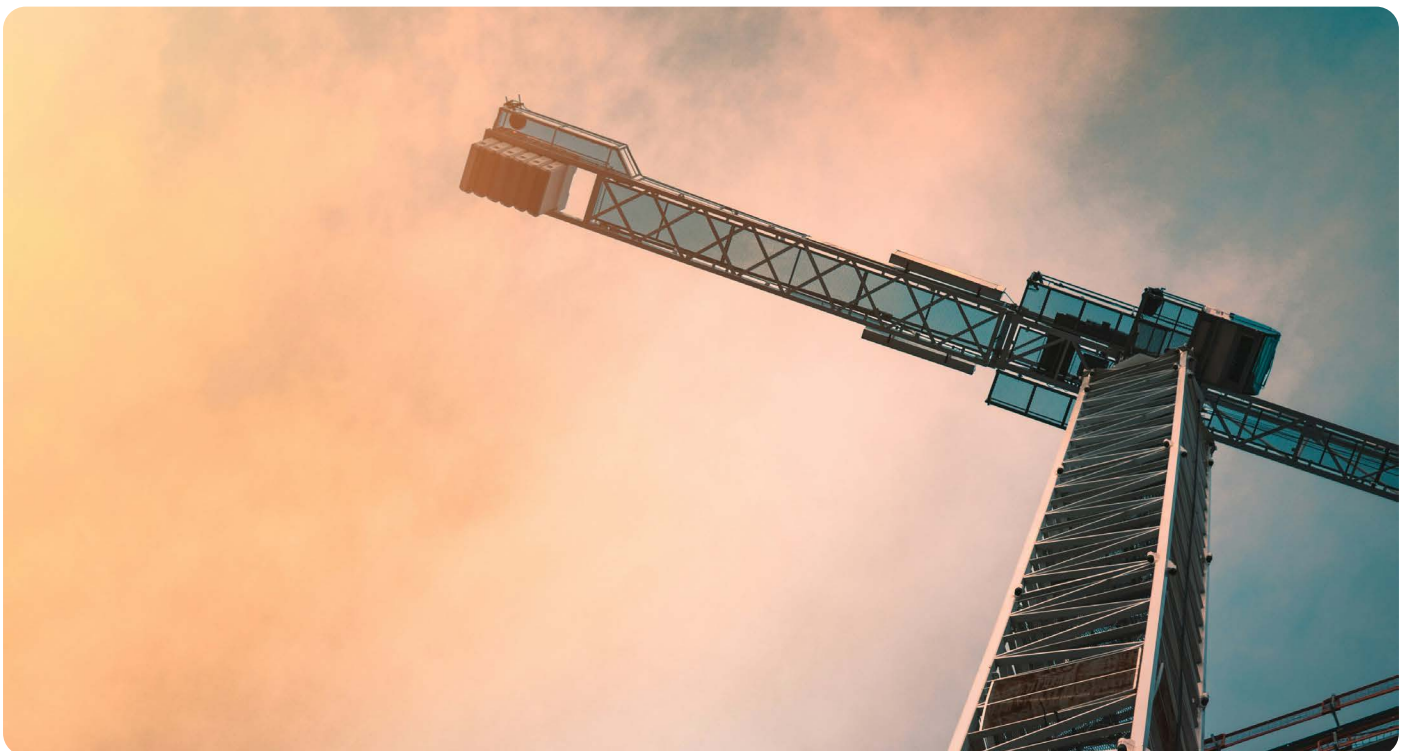
The safety of buildings in Britain should be of great concern to any resident, owner, developer, builder, or public figure. The horrors of Grenfell were multifaceted, and lessons from previous failures in building control were felt with the loss of 72 lives, and the loss of faith in both regulators and builders. Thus, there is little surprise that the response to the Grenfell Disaster was an overhaul of the building control system, and how the building of new projects is managed.

However, with the advent of the Building Safety Regulator in 2023, the British state has cut off its nose to spite its face. Amidst a generationally unprecedented housing crisis, with surge in population growth and historically-low building rates in dense areas, the ability to create an ultra-safe environment for structures whilst also providing enough at pace, is a wicked problem. Industry has been hamstrung by new regulations – building starts in London were down by 38% in Q1 2025, and granted permissions for tall buildings are down from 21 to 6 from 2023 to 2024, owing to the creation of the Buildings Safety Regulator, and secondarily the dysfunctional London Plan.

Fundamentally, the Building Safety Regulator is not fit for purpose. Industry often hides its discontent for the way in which the regulator is acting through carefully worded responses to announcements, or in delicate op-eds. The

author of this paper, having consulted across the sector, is under no illusions that the damage being caused by the failure of this particular regulator has caused a hemorrhaging of jobs in an already shrinking sector, a loss of highly-skilled and dedicated professionals, and caused immiseration (to borrow a Marxist turn of phrase) for residents in Britain's major cities.

The Regulator requires a fundamental change – not just moving street addresses. If it wishes to abide by its Growth Duty, under the Deregulation Act 2015 (Growth Duty Ordinance, 2017), it must shift its position quickly. The construction and development sector has suffered a long train of disruption and difficulties since 2008, and may struggle to continue in a healthy order should there be no change. There cannot be a continuation of the BSR acting as it has done previously – a failure to act will see fewer cranes on the skyline, fewer safe buildings across the country, and less economic growth.



Literature Review

In the past decade and a half, the United Kingdom's building safety regulatory framework has undergone significant transformation. This period, bookended by the 2017 Grenfell Tower fire tragedy, saw a comprehensive overhaul of building safety laws, institutions, and guidance. The following literature review traces the major policy and institutional changes in UK building safety regulation since 2010, with a focus on reforms across all building classes. It covers key legislative developments (such as updates to the Building Act and Building Regulations), changes to technical guidance (Approved Documents), the creation of the new Building Safety Regulator (BSR), and the impact of pivotal events in shaping the current safety regime.

Background: Regulatory Landscape Before 2017

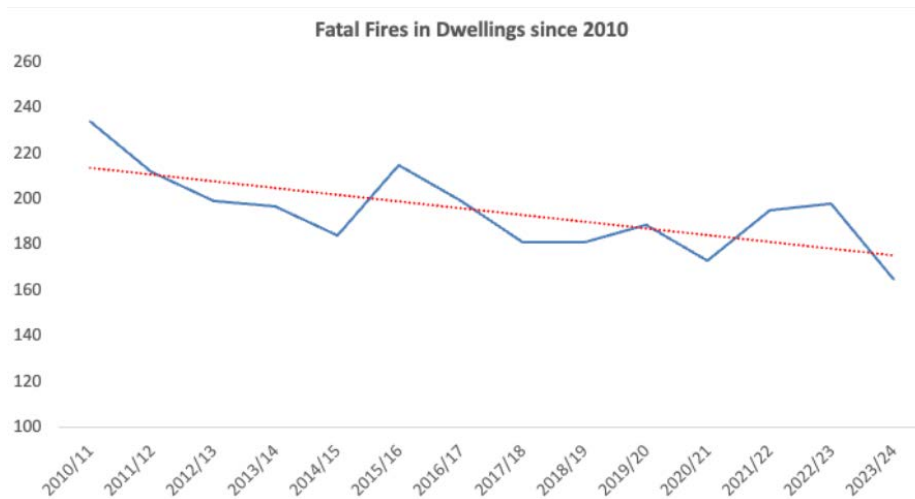
Prior to recent reforms, building safety in England was primarily governed by the Building Act 1984 and the Building Regulations 2010. These regulations set minimum standards for the design and construction of buildings, with detailed guidance provided in Approved Documents (e.g. Approved Document B for fire safety). Enforcement of building standards was carried out through building control bodies (either local authority building control or private Approved Inspectors), and fire safety in occupied buildings was managed under the separate Regulatory Reform (Fire Safety) Order 2005 (which placed a duty on building owners to conduct fire risk assessments). By 2010, this framework had been largely stable for years; for instance, Approved Document B had last been fully updated in 2006, with only minor amendments in 2010 and 2013.

A recurrent theme in literature is that the pre-Grenfell regulatory environment was marked by deregulatory pressures and fragmented oversight. Researchers

have argued that decades of deregulation and a shift toward flexible, industry-led standards contributed to systemically weak building safety controls. For example, an academic analysis by Nadj (2019) contends that "decades of building deregulation, with the shift to a more flexible interpretation of standards, are a major cause" of safety issues such as the use of combustible cladding on high-rises.

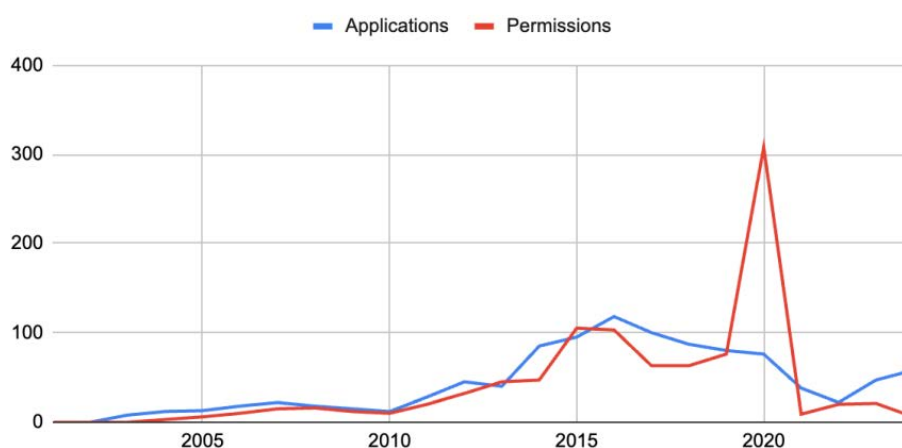
The Lakeland House fire of 2009 (in which six people died in a London tower block) had already exposed flaws in fire safety regulation. In 2013 the coroner from the Lakeland inquest urged the government to simplify and update fire safety guidance (Approved Document B) and encourage retrofitting sprinklers in high-rises. The government acknowledged these recommendations and promised a review of fire safety regulations, aiming to publish a revised Approved Document B by 2016/17. However, by 2017 that promised update had not materialised. Critics suggest that a governmental focus on reducing regulatory "red tape" during the 2010s delayed these safety improvements. As a result, on the eve of the Grenfell disaster, the UK's building safety regime was widely seen as outdated and inadequate, lacking both clear guidance and robust enforcement. Nonetheless, fatal fires in dwellings have decreased over time, most likely due to an increase in building safety, non-flammable materials in homes, and the fall in indoor smoking.

With a decrease in fire deaths since 2010, there has also been a slowing of approvals for HRBs in Greater London in recent years, falling to its lowest rate since 2005 for buildings over 20 meters.



Source: NLA, Tall Buildings Survey, 2020, adapted from more recent publications

Applications and Permissions, buildings over 20 stories



Of note, this is the only sustained period where applications continue to rise as permissions fall away – there is no reason to assume that this will recover as the current investment, planning, and regulatory conditions are not forecast to change substantially. Divergences such as these are rare, and indicate a significant blockage on approving applications.

Using the NHBC’s initial figure of 18,000 missing housing units since 2023, we can model three scenarios moving forward (assuming similar market conditions, such as developers still being eager to invest). If there is no

change, we can expect a fall in planning applications and project delivery, meaning London could lose over 90,000 homes due to a failure of the BSR to reform by 2030. If there is partial reform, this number falls to a 70,000 unit deficit. However, an aggressive reform of the BSR and rally by the sector would see the number only rise to 25,000 units. These are indicative figures using approximations for the current housing deficit from delayed Gateway passthroughs.

Grenfell Tower Fire and its Aftermath (2017–2018)

On 14 June 2017, a catastrophic fire at Grenfell Tower in London claimed 72 lives. The tower's flammable cladding panels caused rapid external fires to spread, exposing severe failures in the building's fire safety measures, which was blamed on corporate malfeasance and regulatory oversight. Grenfell immediately became a watershed moment, highlighting that the existing regulatory system had not prevented the use of hazardous materials or ensured basic safety in high-rise homes. In the words of Sir Martin Moore-Bick (chair of the Grenfell Public Inquiry), the disaster resulted from "decades of failure by the UK central government and the construction industry to understand and act on the dangers of incorporating combustible materials into external walls of high-rise buildings." Building Regulations and guidance in Approved Document B were revealed to have been "poorly run without adequate oversight," reflecting inappropriate attitudes to the value of human life, according to Moore-Bick's findings. These damning conclusions underscored that the regulatory system had systematically prioritised cost and industry convenience over safety, "promoting industry interests over those of citizens" as one commentary noted.

The government reacted to Grenfell with an urgent Building Safety Programme, aimed at identifying and remedying unsafe cladding on hundreds of existing buildings. It is thought that this could cost up to £22.1bn. Simultaneously, a broad review of building regulations and fire safety was commissioned. In July 2017, the Independent Review of Building Regulations and Fire Safety, led by Dame Judith Hackitt, was launched to diagnose the root causes of regulatory failure and recommend reforms.

During this period, there were interim steps to tighten rules. Notably, the government brought forward a ban on combustible cladding for new high-rise buildings. By the end of 2018, The Building (Amendment) Regulations 2018 were introduced, prohibiting the use of combustible materials in the external walls of new buildings over 18 meters that contain flats, as well as in

high-rise hospitals, residential care homes, and student accommodation.

The guidance in Approved Document B was also strengthened for buildings between 11 and 18 meters, setting "clear, strong and proportionate standards of fire safety" for this mid-rise category. For example, by 2020 the government mandated the installation of sprinkler systems and consistent wayfinding signage in all new residential buildings over 11 meters, significantly lowering the previous 30-meter threshold for sprinklers.

These early changes were a direct response to the clear failings seen at Grenfell, particularly around external fire spread and active fire protection measures. Hackitt Review Findings: In May 2018, Dame Judith Hackitt's report "Building a Safer Future" was published, concluding that the entire regulatory system for building safety was "not fit for purpose." Hackitt identified a culture of complacency and confusion: unclear responsibilities, inadequate competency among practitioners, and a lack of effective sanctions for non-compliance. The review criticised the Approved Documents for being too complex and open to misinterpretation, and it warned against a "race to the bottom" mentality in which minimum compliance had become the norm. Crucially, Hackitt did not favour simply adding more prescriptive rules in isolation. Instead, she called for a new framework of accountability spanning the whole building life cycle. Key recommendations included establishing a new statutory regulator for building safety, creating a more robust dutyholder regime (mirroring the approach of Construction Design & Management regulations) to assign clear responsibility at each project stage, and adopting a risk-based approach that would initially target high-risk residential buildings. The Hackitt Review set the blueprint for the sweeping reforms that followed, emphasising a shift from mere box-ticking compliance to a proactive safety culture. Unfortunately, these recommendations have not panned out as intended.

Legislative Reforms and Institutional Changes (2018–2022)

In the years after Grenfell, the UK government introduced multiple pieces of legislation to overhaul building safety regulation. These reforms spanned fire safety in existing buildings, building regulations for new construction, and oversight of building materials and professionals:

- Fire Safety Act 2021: This Act clarified and amended the 2005 Fire Safety Order, explicitly extending its scope to a building's structure, external walls, and flat entrance doors. It was designed to ensure that fire risk assessments for multi-occupied residential buildings address external cladding and balconies (a legal ambiguity that Grenfell exposed).
- The Fire Safety Act 2021, along with new Fire Safety Regulations in 2022, strengthened duties on building owners, for instance by requiring them to share fire safety information with residents and local fire services.
- Building Safety Act 2022: The centerpiece of post-Grenfell legislation. It implemented the majority of Hackitt's recommendations. Major provisions of the Act include:
 - ▢ Creation of the Building Safety Regulator (BSR): The Act established a new regulator within the Health and Safety Executive (HSE) to oversee building safety in England.
 - ▢ The BSR has three principal functions enshrined in law: (1) to implement and enforce a new higher-risk buildings regulatory regime (and act as the building control authority for those buildings), (2) to oversee the safety and standards of all buildings (including monitoring the performance of local authority building control and Approved Inspectors, and advising the government on building regulations), and (3) to promote competence among industry professionals and regulators (for example, by establishing a register of certified building inspectors).
 - ▢ New Oversight for Higher-Risk Buildings (HRBs): The Act defines "higher-risk buildings" as (in the initial phase) residential buildings at least 18 meters or 7 storeys tall with 2 or more residential units.



The Building Safety Regulator (BSR) and its Role

A cornerstone of the new regime is the Building Safety Regulator, established within the Health and Safety Executive by the 2022 Act. The BSR became formally active in 2023 and represents a new institutional approach to governing building safety. According to the HSE, the BSR’s purpose is threefold: (1) to regulate higher-risk buildings (implementing and enforcing the stricter rules for design, construction, and occupation of HRBs), (2) to raise safety standards of all buildings, and (3) to promote and improve competence among professionals in design, construction, and building control. In practical terms, the BSR is responsible for setting technical standards in consultation with industry, approving and registering building control professionals, and acting as a watchdog over the performance of local building control bodies. It must also facilitate resident involvement – for instance, the BSR has a statutory Residents’ Panel to ensure that the voices of occupants are heard in regulatory decisions.

Previously, oversight of building safety was spread across local authorities, fire authorities, and various agencies, with no single entity accountable for systemic failings. Now, the BSR centralises oversight and can hold dutyholders to account with stronger inspection and enforcement powers (including criminal sanctions for serious breaches). The House of Commons Library noted that the BSR will oversee the performance of all other building control bodies and advise on building standards across the board.

In other words, even though day-to-day building control for non-HRB projects remains with local authorities or private inspectors, those bodies are now subject to regulation by the BSR to ensure consistency and competence. Critically, the BSR’s remit extends beyond fire safety alone, as it covers structural safety and overall building performance as well. For example, if construction product defects or structural design flaws pose risks (as was the case in historic failures like the Ronan Point collapse), the BSR is empowered to intervene. Some commentary suggests the BSR could evolve into a broader “Building Control Authority” for England, potentially taking on even more classes of buildings over time. Indeed, the government’s response to the Grenfell Inquiry’s Phase 2 report (published in 2025) speaks of a “new single Construction Regulator” to oversee compliance for all major building work – essentially affirming the central role of the BSR as that regulator.

Written Questions by the former Shadow Secretary of State for Housing, Local Government, and Communities, Kevin Hollinrake MP, demonstrated that the Gateway System is posing a considerable blocker for progress in achieving planning and building highrises.

Decision Made	Gateway 2	Gateway 3	Grand Total
Approval	254	29	283
Invalid	422	0	422
Rejection	247	1	248
Withdrawn	107	0	107
Awaiting Approval	917	80	997
Grand Total	1947	110	2057

The Gateway Process

The Building Safety Act 2022 introduced a comprehensive regulatory framework under the Building Safety Regulator (BSR), obliging all higher-risk buildings (HRBs), those at least 18 m tall (seven storeys) or housing two or more residential units, hospitals, or care homes, to progress through a three-stage “Gateway” approval process.

Gateway One: Integrating Fire Safety at Planning

At the initial stage, developers seeking planning permission for HRBs must submit a Fire Statement, and the BSR acts as a statutory consultee. This early intervention aims to ensure that fire safety is considered proactively during the design phase, not retrospectively.

Gateway Two: Pre Construction Approval and the Emergence of Bottlenecks

Gateway Two, introduced in October 2023, imposes a hard stop: construction cannot commence until the BSR approves the fully detailed design and supporting documentation.

Submissions must include:

- Technical drawings and specifications
- Competency declarations from key project roles
- Fire and emergency plans
- A “golden thread” of compliance information
- Change-control and construction control plans

Legally, the BSR has 12 weeks to complete its review, however, approvals typically take between 25 and 40 weeks, and in some cases up to 18 months. Moreover, approximately 70% of applications are rejected or invalidated at this stage, often due to submission errors or lack of clarity.

As of late 2024, only 14% of Gateway 2 applications had been approved (146 out of 1,018), with 847 still in the backlog. Recent analysis by Cast reveals that just over 10% of submissions to the Gateway 2 scheme made it through the process. This bottleneck is causing construction delays, financial uncertainty, and growing pushback from industry stakeholders.

The BSR has struggled to point out exactly what they are looking for by applicants during Gateway 2, which is even more a concern when requests differ from project to project. One stakeholder this author interviewed noted that the requested documents for an almost identical project were held up for much longer than the same documents for the other almost identical project. This pattern of behaviour cannot continue, as it increases viability risk management, and is turning investors away from British projects.

Gateway Three: Completion and registration before occupation

The final stage of the BSR process for HRBs acts as the final hard-stop before the completed building can be occupied. The applicant must submit documentation and demonstrations that the building is fit and safe to be occupied – a ‘Golden Thread’ of information has to be demonstrated, with the BSR being kept informed of any changes to building controls or previously agreed with the parties.

The planning for this stage begins early in the project, in order to maintain the aforementioned ‘Golden Thread’ of information. Whilst this seems like the most simple step in delivering the building, the very high levels of due diligence expected by the regulator can create pitfalls for finalising delivery and increases risk.

Gateway Three is a point of supreme anxiety for the development and construction sector. **The government must ensure Gateway Three is properly resourced and realistic timescales are kept to.** At present, it does not seem that this is happening, with only 7 of 40 applicants being green-lit last year, which places developers under increased financial strain. It also withholds supply of new accommodation from the market, undermining the government’s own housing targets. **The BSR should seek to emulate Stages 6 and 8 of RIBA’s Plan of Work, which is well-rehearsed within the industry and can be integrated within the Gateway 3’s current methodology.**

An Unreliable Regulator

The Gateway system is, indeed, robust in upholding its statutory obligations to safety-proof the construction of high-rises. However, the manner in which it undertakes reviews and due diligence in architectural integrity is the root of serious concern. The Gateway system’s stop-start and uniquely high regulatory barriers is holding back housing.

The systems thinker Stafford Beer created the heuristic “the purpose of a system is what it does” – with this in mind, there is little doubt that buildings which, eventually, progress through the Gateway System are some of the safest in the world. On the other hand, so few buildings are making it through the System, owing to the manner in which the process is controlled, that more people are locked out of these safe buildings as they simply cannot be delivered. The BSR, owing to its founding cause following Grenfell and the imperative to create safer high rises, is overly-scrupulous in its regulatory process.

Gateway requires a previously unprecedented transfer of documents and information to ensure compliance. The volume of such transfers is required for the BSR to ensure a water-tight control system over applications, construction, and occupation. Some applications have required thousands of complex and extensive documents, each of which are reviewed manually by the BSR’s commissioned multi-disciplinary team (each of which are selected from project to project). This leads

to information stresses and asymmetries between the BSR and applicants, slowing the approvals process down and pressurising communications.

The comprehensive nature of the regulations means that even non-critical, or areas of construction that were universally considered safe, are called into review. One source argued that the BSR was reviewing already compliant and standardised cosmetic features in reception areas, instead of concentrating on potential fire-safety hazards. Multiple sources, who are experienced in construction safety, argued that preventing the piling for high rise buildings during the Gateway 2 phase was not necessary as there had never been a high-rise piling failure in the UK (or in Western Europe).

It is not clear whether the BSR, which is now stationed in MHCLG, is corresponding with its Growth Duty under the Deregulation Acts (2015). The government-issued guidelines for this duty include:

- "Reducing regulatory complexity, e.g. in price reviews for economic regulators to encourage greater investment."
- "Making regulatory decisions in a timely manner, to minimise uncertainty and costs associated with what are often long infrastructure investments lead times."

It is evident by the contraction in the wider-construction sector, slow pass-through rate of the Gateway process, and the low level of starts on high-rises that the BSR is not abiding by its Growth Duty, and it is potentially failing its legal duties to uphold growth. Construction jobs are falling at their fastest rate since the pandemic in 2020, with 17.2% of all firms in England becoming insolvent being construction firms in May 2025.

Given the manual review method employed by the BSR, the ability for the Gateway system to deliver regular timelines for outcomes is jeopardised. Utilising a multi-disciplinary team, which must be newly recruited for each application, lengthy delays are not only expected, but baked into the system. Reports from industry indicate that the expected 12-week wait on new HRB applications is being consistently breached. This, in itself, is a significant risk to project viability, and is likely for the fact that more than twice as many applicants have withdrawn from the system than passed through it.

What is not understood by policymakers and the regulator is the financial aspect to building. Land must be purchased, made ready for development, with buildings designed and the planning process driven through, all while lining up contractors, materials, and marketing. These things in isolation are (often) done simply enough, but brought together into a single development, they are multifaceted, complex, and expensive – the high-rise building is a marvel of the modern world, but it is not simple.

With these aspects requiring extensive financing, reliability is crucial to the development process. An unreliable regulator, which often overruns inexplicably, can cause chaos to financing agreements – funding is often time-limited, and on-time execution of a project is critical to recouping debts and paying contractors. This is even more so a problem for projects with time-sensitive markets, specifically student accommodation,

which can only fill their dwellings in the run up to the academic year – if a project clears all of the gateways in January instead of May, for example, would remain empty and creditors would be left.

Applicants face the following risks in any building project: fluctuations in supply-chains, macroeconomic instability, financial agreements, debt exposure, execution targets (especially for student accommodation), and insurance liabilities. These are all exacerbated by the stochastic and unreliable Gateway process.

Even during the Gateway process, the applicant is not encouraged to keep in communication with the Regulator, as the website admits: "You do not need to contact BSR while your application is being assessed. BSR will contact you if they need any further information." Constant communication should be encouraged by the regulator, so that issues can be addressed and resolved in a rapid time – however, individuals the author has spoken to in the research of this report have outlined that the BSR is slow, vague, and unreliable in its communications.

A significant concern in the industry is the churn, or replacement of BSR staff on review teams, as different members of staff on the BSR team may offer contradictory opinions during the review of documentation, and conversations may be lost over a matter of months. This is onerous, time consuming, and unreliable – the BSR should do everything in its power to rectify this.

This is not the only matter of unreliable communication: churn can mask how poorly documents are processed. The BSR requires that documents are submitted in standard, unreadable PDFs – this means that searches through the document can only occur manually, and thus, inefficiently.

The government currently utilises AI in Whitehall departments, including in HMRC, Department of Transport, and the Home Office – by implementing LLM analysis into the electronic file management system, it can do much of the heavy lifting currently burdening members of staff. Whilst AI should not be used for graphical documents, such as blueprints, it should be used for testing compliance and analysis in technical and written documents.

The BSR should implement an electronic file management system which can receive readable PDFs directly from applicants – this would also assist in the maintenance of the Golden Thread. These files should be processed by commercially-available Artificial Intelligence (preferably already procured by Central Government), bypassing the expensive and (for most documents) redundant manual labour of skilled practitioners who are better served working in the sector. Training of the AI for what a safe building looks like for the BSR would also permit applicants to keep a track of their progress through different stages of the Gateway system, reducing stress and repetitive communication between the regulator and the applicant. Having spoken to individuals in the industry, there are developers who would be happy to contribute to the costs of this system, so long as it reduces wait times on decisions.

Regulatory Innovation, in the BSR and in the sector

It is well-known that overregulation can stifle product and systems innovation. Philippe Aghion and others, in their groundbreaking paper for the London School of Economics, *The impact of regulation on innovation*, found that contrary to other papers on the subject, regulations stifle innovation twice as much as assumed. This has considerable implications for the architectural and construction industry, both within the domestic market and for Britain's international competitiveness.

Due to the stringent nature of BSR oversight, and a reticence to utilise new materials or methods for fear of regulatory rejection, there is a slow-down in innovation within the construction industry. Speaking to two architects, the author was told that the "mountain of paperwork" and "red tape" was distracting their firms from providing innovative designs to clients, and that clients were reluctant to opt for potentially cost-saving, sustainable designs, for fear of being reprimanded by the BSR. Until an application is fully resolved within the Gateway system, the building cannot begin construction – this holds up execution of projects and creates problems within the supply chains of the wider industry. **Similar to adding planning conditions to an application, should the BSR approve of the progression of applicants, they should have conditional additions / changes to the application as the building progresses in order to speed up delivery and remove the backlog.**

The BSR should also outline a payment structure for reviews and appeals of applications, as well as fast track applications, which would create a new funding stream for the regulator.

Of note, the modern methods of construction sector, particularly volumetric module construction, are particularly at risk of the BSR's system. MMC relies upon consistent, high-volume orders in order to maintain profitability. The aforementioned unreliability of the regulator, and its habit of intervening to make small changes in design, removes the ability of these innovative solutions to remain in the UK. As the former Secretary of State for Housing, Angela Rayner MP, highlighted with the £132m funding announcement into skills in the construction industry, there is a considerable skills shortage in the sector – MMC offers an innovative and rapid solution. **The BSR should place MMC suppliers and designs on a 'pre-approval' list, designating standardised frameworks for their construction and deployment, and automatically greenlighting their inclusion within any building design.**

Regardless of the above innovations, the BSR should permit piling on sites when enough progress has been made through Gateway 2. Piling has not been found at fault with any resident safety in recorded history, so

forcing its delay whilst the review process is ongoing is counterproductive and illogical. Likewise, concurrence in building should occur with the progression of each area of review – for example, if the bricks and insulation are approved by the BSR, the builder should be allowed to commence construction with those materials where it is feasible to do so.

The ability to innovate in design and architecture, as mentioned, has been fundamentally hampered by the BSR's regulatory regime. Proprietary materials and equipment, such as elevators and HVAC solutions, must undergo the same regulatory oversight as non-proprietary materials, such as bricks, panelling, or glass. This is a Kafka-writ-large – proprietary equipment does not change in its design or implementation, meaning a standardised and already highly-regulated system should not require re-evaluation project to project. **The BSR should create a "white-list" for certain entities, who utilise universally used proprietary materials in the supply chain, and fast track their components within the application. Suppliers can apply for addition to this list for approval by the BSR, and will pay a fee for retention on this scheme. This can be modelled after the Certified by Cast scheme, which seems to be the current industry leading standard for certification, having consulted various schemes.**

Certification and testing should be undertaken by private companies, rather than by the government, as the bottleneck of testing capacity remains a concern amongst industry. Guidelines, of course, should be set by official bodies such as the British Standards Group. We can see from evidence from the Product Safety Testing Sampling Protocol Programme, between April 2020 to March 2024, only 695 products were tested, which is an inadequate quantum for the testing regime required for the building sector – it should be undertaken by certified contractors in the building industry.

Innovation should also be the heart of the regulator's attitude towards the sector. Britain's architectural prestige is well known globally, with the Royal Institute of British Architects being the accreditor for schools in over 39 countries worldwide. Speaking with Gateway applicants, this tradition of innovation is not held up by the Regulator's culture – interviewees said that there was a strong sense of the "regulator and the regulated", with relationships being strained by the poor mix of tight deadlines against very tight regulations. **The BSR should be proactive in resolving complaints in any application, and seeking to work with applicants to create innovative solutions to problems within the application. This can take the form of suggesting constructive changes and alterations to building designs.**

Creating a Fitch or S&P Style Regulator

The BSR, in its current location, is not fit to handle the scale and complexity of applications that are required to fix the urban housing crisis. We recommend turning the BSR into a **Fitch or Standard & Poor's type regulator that stands equidistant between government and industry.** The regulator, following investment from industry and run by a board of Government appointed experts, should have the resources to hire permanent teams of experts to administer regulations. These standing Multi Disciplinary Teams, who should be well-remunerated and resourced to execute their jobs in a timely manner.

The regulator should be able to process and grade reliable applicants, and those in their supply chain, with accreditation. If an applicant has a history of submitting safe applications, which are executed up to spec (as assessed by Gateway 3), the applicant and those in their supply chain. This would permit the regulator to more rapidly process applications, and maintain a high-level of safety without further delays.

Credit ratings agencies review the ability of entities to repay loans and pay interest, allocating a rating to them (from D for Default up to AAA, the safest rating). These ratings apply as much to smaller companies as to countries – for example, the UK is rated as AA- by Fitch Ratings. These organisations receive funding via fees and selling reports to investors – since 2008, credit ratings agencies have been regulated into better compliance and due diligence.

In a similar vein, the BSR should switch its regulatory practice to rating the safety of developments, above a baseline safety threshold. This would allow for an additional revenue stream for the regulator, and permit developers (and those in its supply chain) to work towards the highest safety ratings. Whilst the current fees for review are £144 an hour to review a Gateway 2 application, following a £180 application fee, these could be feasibly increased should the above suggested reforms restore confidence in the regulator. These ratings could go from A (baseline safety) through to AAA (very safe), or mimic the Energy Efficiency Rating system used in white goods. The consumer's preference for more efficient, or less risky credit, instructs us as to how financiers, developers, architects, and residents, would prefer a safer building than a less safe one. **The BSR should take an innovative approach to its regulation, and allow the competitive market for developers and builders to compete for excellence in safety.**

By creating a separate regulator, resourcing and independence from both business and government would create the space for permanent Multi Disciplinary Teams. Current concerns around the BSR's unreliability and speed often comes down to the time it takes to appoint an MDT for each project. **Permanent MDTs working for designated applicants should be set-up, with as little churn in these teams as possible, during the lifetime of any application from Gateway 1 through 3.** This would also ensure there is active, two-way dialogue.



Recommendations

1. The government must ensure Gateway Three is properly resourced and realistic timescales are kept to.
2. The BSR should implement an electronic file management system which can receive readable PDFs directly from applicants – this would also assist in the maintenance of the Golden Thread. These files should be processed by commercially-available Artificial Intelligence (preferably already procured by Central Government), bypassing the expensive and (for most documents) redundant manual labour of skilled practitioners who are better served working in the sector.
 - a. Training of the AI for what a safe building looks like for the BSR would also permit applicants to keep a track of their progress through different stages of the Gateway system, reducing stress and repetitive communication between the regulator and the applicant.
3. Similar to adding planning conditions to an application, should the BSR approve of the progression of applicants, they should have conditional additions / changes to the application as the building progresses in order to speed up delivery and remove the backlog.
4. The BSR should also outline a payment structure for reviews and appeals of applications, as well as fast track applications, which would create a new funding stream for the regulator.
5. The BSR should permit piling on sites when enough progress has been made through Gateway 2.
6. The BSR should create a “white-list” for certain entities, who utilise universally used proprietary materials in the supply chain, and fast track these within the application. Suppliers can apply for addition to this list for approval by the BSR, and will pay a fee for retention on this scheme. This can be modelled after the Certified by Cast scheme, which seems to be the current industry leading standard for certification, having consulted various schemes.
7. The BSR should be proactive in resolving complaints in any application, and seeking to work with applicants to create innovative solutions to problems within the application. This can take the form of suggesting constructive changes and alterations to building designs.
8. The BSR should be converted into a Fitch or Standard & Poor’s type regulator that stands equidistant between government and industry. The regulator, following investment from industry and run by a board of Government appointed experts, should have the resources to hire permanent teams of experts to administer regulations. These standing Multi Disciplinary Teams, who should be well-remunerated and resourced to execute their jobs in a timely manner.
9. The regulator should be able to process and grade reliable applicants, and those in their supply chain, with accreditation. If an applicant has a history of submitting safe applications, which are executed up to spec (as assessed by Gateway 3), the applicant and those in their supply chain. This would permit the regulator to more rapidly process applications, and maintain a high-level of safety without further delays.
10. The BSR should take an innovative approach to its regulation, and allow the competitive market for developers and builders to compete for excellence in safety.
11. Permanent MDTs working for designated applicants should be set-up, with as little churn in these teams as possible, during the lifetime of any application from Gateway 1 through 3.
12. Develop Prescriptive Guidance: Collaborate with industry bodies to create detailed, standardised guidance on Gateway 2 and Gateway 3 submission requirements which is formally endorsed and/ or adopted by the BSR. Noting the CLC guidance places greater responsibility on applicants to ensure submissions are clear, organised, and compliant using structured tools, detailed and prescriptive guidance would facilitate standardisation of applications which, in turn, should improve the efficiency of the BSR’s review and processing.
13. Introduce Pre-Application and Early Engagement: Establish a formal mechanism for early application meetings with MDTs to resolve potential issues early in the process. This aligns with the CLC’s recommendation to encourage early engagement with the BSR and submit an Application Strategy for complex projects to improve collaboration and reduce delays.
14. Competency Improvements: Ensure that BSR case officers and MDT members are adequately trained, have access to standardised guidance and are experienced in handling HRB applications.
15. Streamline Documentation Requirements: Standardise submission formats and provide clear guidance on how to present information in Gateway applications to avoid duplication and confusion. This aligns with the CLC guidance, which highlights the importance of using structured tools such as the Application Information Schedule, Application Strategy, and logical frameworks for submissions to ensure clarity and Compliance.
16. Use Local Authority Building Control Officers for Gateway 3 Inspections for leveraging local expertise and infrastructure to free up BSR time and resources.

Conclusion

As it stands, the BSR theoretically provides the framework for building the safest buildings in the world – in reality, it stops these safe buildings from being delivered. It has confused mass documentation with risk control and treated time as a free input when, in development, time is the most expensive commodity on the site. The fallout is exactly what you would expect from a process-first, delivery-second regime: stalled sites, missed financing windows, demoralised teams, and empty plots where structures should stand.

None of this requires us to lower the bar on safety. It requires us to raise the bar on competence. Starting with the obvious – risk-proportionate sequencing. Allow piling and other clearly low-risk works to proceed once the relevant technical packages are accepted during Gateway Two. There is no recorded domestic history of high-rise piling failure causing collapses; blocking it adds months to projects with no corresponding improvement in resident safety. Similarly, when discrete elements, such as façade build-ups or MEP plant, are cleared, let construction proceed on those elements subject to a transparent change-control regime. This keeps programmes moving while preserving the Golden Thread.

Next, stop drowning both sides in unsearchable paper. Mandate machine-readable submissions and build an electronic file management system that ingests structured data. Use commercially available AI to triage completeness, flag inconsistencies, and maintain a real-time status dashboard for applicants and the regulator alike. This is not “AI to replace judgement”; it is AI to remove drudgery so expert judgement is applied where it matters. The regulator should publish standardised checklists per building typology, lock in service-level agreements, and keep a stable multi-disciplinary team attached to each case from Gateway One through Gateway Three. No more churn, no more contradictory mid-stream opinions, no more radio silence followed by a scattergun RFI.

Innovation needs air, not red tape. Modern methods of construction and volumetric systems live on repetition and pre-certified assemblies; forcing them through bespoke, case-by-case re-litigation is a policy choice to export that capacity overseas. Create white-lists and pre-approvals for common proprietary components and for certified MMC platforms (modelled on best-in-class industry schemes). If a lift system or HVAC package is unchanged in design, it should not be re-examined from scratch on every project. Charge suppliers for entry and annual retention if you must, but give projects certainty and shorten the critical path.

Financing reality must be baked into the process. Development debt is time-bounded. Student

accommodation has a single yearly intake. Build-to-rent operates on lease-up curves that compound with delay. A regulator that misses its own 12-week statutory target by doubling or tripling it is not a neutral actor; it is injecting viability risk. The government’s Growth Duty exists precisely to prevent this: regulators are supposed to make timely, investment-supportive decisions and reduce complexity. Current performance does the opposite. If ministers want cranes on the skyline and residents in warm, safe homes, they must instruct the BSR to operate to the Growth Duty in fact, not theory, and resource it accordingly.

Following a Freedom of Information Request with the BSR, the organisation replied: “BSR is regulating primarily with regard to the Building Safety Act 2022 (BSA), which sets the relevant policy in this area. The process of introducing the BSA included a full policy impact analysis, which did include the potential economic impacts of the policy. This policy is due for review in 2027 and in the meantime, BSR and MHCLG keep the implementation of the policy under constant review for any amendments which might be necessary to ensure the smooth operation of the regime. Any such amendment would now include a Growth Duty assessment as part of the impact analysis.

“The BSR will always seek to take proportionate action in the implementation of the legislation, and this will take into account the balance between regulatory action and potential impact on growth. Nevertheless, the BSR is required to follow the requirements of the Act and, whilst we acknowledge that the current challenges facing Gateway 2 processing times are frustrating, the BSR is not able to reduce the requirement to demonstrate compliance with the Building Regulations in order to accelerate processing times. As such, the BSR’s focus is upon improving the effectiveness and efficiency of the decision-making process to reduce processing times.” It is therefore imperative that the regulator speeds up its efficiency drives in order to comply with the Growth Duty.

Even with these improvements, the current institutional placement and incentives are wrong. The UK needs a regulator that is equidistant from ministers and industry, run by a board of appointed experts, funded transparently, and staffed by permanent MDTs who are paid well enough to stay. A ratings-based model would flip the incentives. Set a clear baseline compliance threshold; then score projects and supply chains on demonstrated safety performance. Accredited repeat-reliable applicants and their key vendors. Publish ratings and let the market reward those who consistently deliver “AA-level” safety with expedited processing and lower scrutiny where justified. Charge realistic fees for this level of service and use them to guarantee capacity, not just bureaucracy.

Process design should support continuous dialogue, not suppress it. The BSR's current guidance, "do not contact us; we'll contact you", is antithetical to problem-solving on complex, multi-million pound schemes. Establish mandatory touchpoints, shared action logs, and a single accountable case lead. Where the regulator identifies non-critical cosmetic or already-standard elements for redesign, it should explain the risk basis and prioritise the issues that actually move the needle on resident safety: structure, fire strategy, compartmentation, egress, detection and suppression, and construction product integrity.

Measure what matters and publish it. Monthly dashboards should report median and 90th-percentile Gateway Two and Three decision times, backlog size, withdrawal rates, and reasons for refusal, at a minimum. If you can't measure and share it, you can't manage it, and the industry cannot plan around it. Tie senior leadership performance to those metrics. If the regulator misses SLAs, it should say so publicly and explain how it will recover.

Time is of the essence in reforming the regulator. The construction industry in London, from brick suppliers to architects to developers, are being punished by poor regulatory oversight. All of this is despite them working towards the government's primary mission – to 'Build, Baby, Build' 1.5 million homes by the end of this Parliament. Works should start today to integrate sensible and innovative ideas into the regulator.

Leave the BSR unchanged and we know the outcome: fewer starts, fewer completions, fewer safe homes, and an industry that shrinks when it should be rebuilding capacity. Proceed with the reforms laid out here and we can have a regulator that is tougher where it counts and faster everywhere else, one that professionalises delivery, rewards proven competence, scales MMC, and gets families into safe buildings sooner. That is the only honest test of success. Everything else is paperwork.

The background is a dark purple architectural drawing. It features a grid of dashed lines with various numerical annotations such as 36, 23 1/2, 11, 27, 16 1/2, 15 1/2, and 79. Thick, dark lines represent structural elements like walls and columns. Some areas are filled with horizontal hatching, and there are small arrows indicating directions or measurements.

SAFE AND ABUNDANT

REFORMING THE BSR TO SOLVE THE

URBAN HOUSING CRISIS



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