Southern Housing **consultation response**

March 2026

MHCLG consultation on improving proportionality and safety outcomes in building control: telecommunications

Drilling holes for fibre optic cabling

Question 1
Do you think that the current procedural requirements of building control are reasonable for the drilling of holes through fire-resisting internal walls for fibre-optic cabling? In particular, we would welcome views on whether current procedures ensure that work complies with building regulation requirements while allowing the work to be carried out in reasonable timeframe and for a reasonable cost.

a) For buildings within scope of the higher-risk regime:
Reasonable, Unreasonable, don't know

Comments:

We consider that the current procedural requirements for drilling through fire-resisting internal walls for fibre-optic cabling in higher-risk buildings are not fully proportionate to the nature and risk profile of these works. However, where drilling involves load-bearing elements or impacts structural fire protection, we consider the existing regime to be appropriate and proportionate given the increased risk.

While we fully support the need to maintain robust control over works affecting fire resisting elements and compartmentation, the existing process places a level of administrative burden comparable to more complex building alterations. In practice, this can lead to delays, increased costs, and challenges in delivering essential digital infrastructure, with some providers reluctant to engage with the current requirements, resulting in a delivery impasse.

We consider that there is an opportunity to introduce a more proportionate, risk-based approach for clearly defined low-risk interventions, supported by appropriate assurance mechanisms to ensure compliance with building regulations is maintained without unnecessary impact on programme delivery.

b) For buildings outside the scope of the higher-risk regime:
Reasonable, Unreasonable, don't know

Comments:

Procedural requirements for non-HRBs are not being followed in line with latest building regulations where assuming the work is classed as building work, that the relevant

building control authority is being notified and therefore an initial notice and application would require submission by the service provider.

From our experience service providers have a different view from landlords on whether fibre optics installation constitute building works and therefore a material alteration. It would be helpful to know, since 2010 how many building control notifications by initial notice have been issued to relevant building control authorities for this work.

Assuming the procedural requirements are followed, submitting an initial notice is reasonable along with relevant plans and specifications however, submitting an application with the intent to await approval before commencing work is disproportionate to the complexity of work and associated risk of the work being delivered poorly.

Question 2
Do you think that this work is currently carried out in compliance with the safety requirements of building regulations by installers?

a) For buildings within scope of the higher-risk regime:
Yes, No, Don't know

Comments:

We do not consider that this work is consistently carried out in compliance with the safety requirements of building regulations. The absence of clear, detailed guidance from the Building Safety Regulator on how the higher-risk building regime applies to fibre-optic installations has led to varied interpretation across the sector.

In practice, landlords often rely on installers' understanding of the requirements, which can result in works proceeding without appropriate building control approval. In addition, there is variability in installation standards across providers, with no established competent persons scheme or consistent industry standard to provide assurance.

As a result, there is a risk of non-compliant installations, particularly in relation to fire stopping and compartmentation. Greater regulatory clarity, alongside defined competency or assurance frameworks, would support more consistent compliance, supplemented by appropriate inspection and verification by dutyholders.

b) For buildings outside the scope of the higher-risk regime:
Yes, No, Don't Know

Comments:

We do not consider that this work is consistently carried out in compliance with the safety requirements of building regulations for buildings outside the higher-risk regime.

The standard of fibre-optic installations varies across providers and contractors, and in the absence of a recognised competent persons scheme or consistent industry standard,

there is a risk of poor-quality or non-compliant installations, particularly in relation to fire-stopping.

To mitigate this, landlords must rely on robust contract management and the use of appropriately qualified specialists to inspect and verify installations, ensuring that any defects are identified and rectified.

Greater consistency in standards and clearer assurance mechanisms would support improved compliance across the sector.

Question 3

What are the risks for residents/ building users if this work is not carried out in compliance with the requirements of building regulations?

Comments:

Non-compliant installation of fibre-optic cabling can result in ongoing disruption due to rectification of works, increased risk of fire and smoke spread where fire-resisting elements are penetrated and not adequately reinstated.

While the individual risk associated with a single penetration may be relatively limited, the cumulative impact across a building has the potential to compromise compartmentation, adversely affect evacuation routes and strategies, and reduce the overall effectiveness of fire protection measures.

Ensuring that all penetrations are appropriately fire-stopped and compliant with building regulations is therefore essential to maintaining resident and
building user safety.

Question 4

What are the risks for residents/building users if this work is not carried out in reasonable timeframes or for a reasonable cost?

Comments:

Where this work is not carried out within reasonable timeframes or at a reasonable cost, there is a risk that residents may experience delays or be unable to access super-fast and reliable internet connections. This can result in residents being left behind digitally, limiting their ability to benefit from essential services such as online education, employment opportunities, healthcare access, and wider social connectivity. Ensuring timely and cost-effective delivery of these works is therefore important to support digital inclusion and resident wellbeing.

Question 5

If you are an industry member undertaking this work, how do you record and ensure your compliance with building regulations requirements?

Comments:

n/a

Question 6

If you are an industry member, how do you regularly assess the competence and capability of those undertaking this type of work on behalf of your organisation?
Comments:

n/a

Question 7
If you are an industry member, how do you regularly quality assure the work undertaken by your organisation?
Comments:

n/a

Question 8
Do you think that industry has the appropriate competence and organisational capability to undertake this work with the reduced building control oversight proposed in the dispensation? Could you please provide views and evidence in the comments to support your answer.
Yes, No, Don't know
Comments:

Industry has the capability to undertake this work with reduced building control oversight, provided that appropriate controls and assurance mechanisms are in place. Current industry practices and established fire-stopping techniques mean that small penetrations through fire-resisting elements can be carried out safely and in compliance with building regulations. However, this is dependent on the dispensation being clearly defined and supported by robust oversight by the building owner/ Responsible Person/Accountable Person during delivery, including effective supervision, inspection, documentation, and certification of works. Clear and practical guidance is also required to support contractors and installers in both the design and delivery of these works, ensuring a consistent understanding of regulatory expectations. To further strengthen assurance and drive consistency, the introduction of an industry standard and a recognised competent persons scheme should be considered.

Question 9
Do you foresee any risk to the safety and performance of buildings, and by extension the safety of residents, that could arise from our proposal to dispense with the procedural requirements of building regulations for the drilling of holes for fibre-optic cabling?

a) For buildings within scope of the higher-risk regime:

We do not foresee significant risks to the safety or performance of buildings, or to the safety of residents, arising from the proposed dispensation, provided that an industry-recognised standard is established and adhered to. This should be supported by clear guidance, defined competency requirements, and appropriate assurance processes from the building owner, responsible person, accountable person and installer - including inspection, certification, and record-keeping. Without these controls, there is a risk of inconsistent installation practices and potential impacts on fire compartmentation.

b) For building outside the scope of the higher-risk regime:

We do not foresee significant risks to the safety or performance of buildings, or to the safety of residents, arising from the proposed dispensation, provided that an industry-recognised standard is established and adhered to. This should be supported by clear guidance, defined competency requirements, and appropriate assurance processes from the building owner, responsible person, accountable person and installer – including inspection, certification, and record-keeping. Without these controls, there is a risk of inconsistent installation practices and potential impacts on fire compartmentation.

Question 10

Do you think that it is reasonable to dispense with some of the building control procedural requirements for the drilling of holes for fibre-optic cabling? **If you do not agree, please provide views and evidence in the comments section as to why the proposal is not reasonable.**

a) For buildings within scope of the higher-risk regime:

Agree, Disagree, Don't know

Comments:

Yes to dispensing some requirements.

b) For buildings outside the scope of the higher-risk regime:

Agree, Disagree, Don't know

Comments:

Question 11

Do you agree with our suggested proposal to dispense with all building control procedural requirements for the drilling of holes for fibre-optic cabling for higher-risk and non-higher-risk buildings? If you do not agree, please could you provide views and evidence in the comments section as to why the proposal is not reasonable.

We would also welcome alternative suggestions for what a reasonable and proportionate approach could look like, in terms of dispensing with building control procedural oversight for the work, while maintaining safety and performance standards.

a) For buildings within scope of the higher-risk regime:

Agree, Disagree, Don't know

Comments:

We support, in principle, a more proportionate approach to building control procedural oversight for the drilling of holes for fibre-optic cabling. However, we do not support dispensing with all procedural requirements in every circumstance. For clearly defined low-risk works such as minor penetrations through fire-resisting internal walls that do not affect load-bearing elements or structural fire protection we agree a reduced regime would be appropriate. Where works have the potential to impact structural elements continued procedural oversight may remain necessary.

A more appropriate approach would be the introduction of a tiered, risk-based framework supported by clear eligibility criteria.
This framework should be underpinned by an industry-recognised installation standard, defined competency requirements, and robust assurance processes, including inspection, certification, and record-keeping. This would allow low-risk works to proceed more efficiently while ensuring that penetrations are properly fire-stopped, and documented as part of the building's safety information.

b) For buildings outside the scope of the higher-risk regime:
Agree, Disagree, Don't know
Comments:

We support, in principle, a more proportionate approach to building control procedural oversight for the drilling of holes for fibre-optic cabling. However, we do not support dispensing with all procedural requirements in every circumstance.

For clearly defined low-risk works such as minor penetrations through fire-resisting internal walls that do not affect load-bearing elements or structural fire protection we agree a reduced regime would be appropriate. Where works have the potential to impact structural elements continued procedural oversight remains necessary.

A more appropriate approach would be the introduction of a tiered, risk-based framework supported by clear eligibility criteria. This framework should be underpinned by an industry-recognised installation standard, defined competency requirements, and robust assurance processes, including inspection, certification, and record-keeping. This would allow low-risk works to proceed more efficiently while ensuring that penetrations are properly fire-stopped, and documented as part of the building's safety information.

Question 12
Do you agree with our suggested scope of building work that would be covered by the dispensation? If you do not agree, please could you provide views and evidence in the comments section as to why the scope is not reasonable.

a) For buildings within scope of the higher-risk regime:
Agree, Disagree, Don't know
Comments:

We do not fully agree with the proposed scope, as it is limited to internal fire-resisting walls and does not reflect how fibre-optic installations are delivered in practice. Where existing routes are unavailable, small penetrations through external walls are often required, and excluding these may delay works or prevent full connectivity.

We consider a risk-based approach could be extended to external wall penetrations, subject to appropriate controls, including fire-stopping and assessment of external wall systems through FRA EWs/PAS 9980 assessments.

Where cabling is to be routed through external wall systems the building owner, Responsible Person, or Accountable Person should seek advice from a competent fire or structural engineer to ensure safety and compliance are maintained before authorising

the installer to proceed with work. The relevant building control authority should be notified of the work once the building owner, responsible person or accountable person has give authorisation to proceed.

b) For building outside the scope of the higher-risk regime:
Agree, Disagree, Don't know

Comments:

We do not fully agree with the proposed scope, as it is limited to internal fire-resisting walls and does not reflect how fibre-optic installations are delivered in practice. Where existing routes are unavailable, small penetrations through external walls are often required, and excluding these may delay works or prevent full connectivity. We consider a risk-based approach could be extended to external wall penetrations, subject to appropriate controls, including fire-stopping and assessment of external wall systems through FRA EWs/PAS 9980 assessments. Where cabling is to be routed through external wall systems the building owner, Responsible Person, or Accountable Person should seek advice from a competent fire or structural engineer to ensure safety and compliance are maintained before authorising the installer to proceed with work. The relevant building control authority should be notified of the work once the building owner, responsible person or accountable person has give authorisation to proceed.

Question 13
In terms of conditions set for this proposal, should the dispensation be restricted to a certain size of hole drilled for installation of fibre optic cabling? What should this be?
Yes, No, Don't know
Comments:

Yes, this remains reasonable to ensure that the necessary cables can be brought into the property without being excessive. This should be developed in consultation with fibre infrastructure providers and contractors to ensure practicality and consistency in implementation.

Question 14
In terms of conditions set for this proposal, should the dispensation be restricted to certain number of holes that can be drilled in a fire-resisting internal wall? What should this be?
Yes, No, Don't know
Comments:

Yes, this remains reasonable to ensure that only the penetrations necessary for the safe installation of fibre-optic cables through fire-resisting elements are created. The number of penetrations will vary depending on the size, layout, and construction of the building and its floors. There should generally be no more than two penetrations through the fire compartmentation between floors (for example, within riser cupboards). However, the specific number required will depend on the installation method and the approach used to distribute fibre-optic cables to each dwelling. Solutions such as cable trays above suspended ceilings, InvisiLight/EZ-bend cables, trunking, point-of-entry boxes, or coiled cable storage may all require different penetration requirements.

These details should be developed in consultation with fibre infrastructure providers and contractors to ensure practical, consistent implementation while ensuring that only essential penetrations are made and that all are fully fire-stopped using appropriate, compliant materials.

Question 15

In terms of conditions set for this proposal, should the dispensation be restricted to certain number of cables that can be fed through one drilled hole? Please indicate in the comments how many this should this be.

Yes, No, Don't know

Comments:

Yes, this remains reasonable to ensure that only the required number of cables are fed through one drilled hole and limiting any excessive unnecessary materials entering the building.

The number of cables will vary depending on the size, layout, and construction of the building and its floors. The specific number of cables required per hole will depend on the installation method and the approach used to distribute fibre optic cable to each dwelling.

These details should be developed in consultation with fibre infrastructure providers and contractors to ensure practical, consistent implementation while ensuring that only essential cables are fed into the hole and the old is fully fire-stopped using appropriate, compliant materials.

Question 16

Should the scope of the dispensation be applied to other forms of building work, where work requires the drilling of holes for other types of cabling? We would welcome views on: other types of work that would be reasonable to include in the dispensation, how they differ or compare to the installation of fibre optic cabling, and why the current procedural requirements of building regulations are unreasonable and disproportionate for these types of work.

Yes, No, Don't know

Comments:

We support extending the dispensation to other types of low-risk building work involving cable penetrations, where the activities are routine, standardised, and present a similar risk profile to fibre-optic installations. This may include internal cabling for systems such as CCTV, access control, door entry, fire detection unless there is a full system replacement, and data networks, as well as like-for-like replacements using existing routes.

These works typically involve small, repetitive penetrations through fire-resisting elements and are delivered at scale, presenting similar risks and challenges to fibre installations. The current building control process can be disproportionate for such minor works, particularly where it introduces delays and administrative burden without necessarily improving installation quality.

However, any extension of scope should be clearly limited to genuinely low-risk activities and supported by defined standards, competent installers, and robust assurance processes. This should include requirements for compliant fire-stopping, photographic evidence, and record-keeping to support future maintenance and repairs. More complex works, including those affecting structural elements or higher-risk fire compartmentation features, should remain subject to existing controls.

Question 17

Do you agree with our proposal to impose a condition requiring the work to be notified to the building control body on completion? If you agree, what level of detail do you think is appropriate to provide? If you disagree, please could provide evidence as to why this would not be reasonable. We would also welcome any views and evidence on the associated time and costs of requiring this notification when work is completed.

a) For buildings within scope of the higher-risk regime:
Agree, Disagree, Don't know
Comments:

We consider that a post-completion notification requirement could support record keeping and audit; however, in isolation it is unlikely to provide meaningful assurance or influence contractor behaviour. Given the anticipated volume of minor works, there is a risk that the Building Safety Regulator would be unable to effectively monitor or enforce compliance through notifications alone. This may result in a process that creates a perception of oversight without delivering substantive assurance. In addition, without review or validation, there is limited incentive for contractors to consistently comply.

If such a requirement is to be introduced, it would need to be supported by a streamlined, standardised digital process (for example, a dedicated portal) to ensure it is practical and does not create disproportionate administrative burden. Information submitted should be minimal but sufficient to support the Golden Thread, including location of works, confirmation of compliant fire-stopping, photographic evidence, and certification by a competent installer.

However, we consider that a more effective approach would be to align with existing principles such as Regulation 38, whereby contractors are required to confirm that relevant information has been provided to the Responsible Person or Accountable Person, and receipt is formally acknowledged with notification issued to the relevant building control authority. This would place accountability on both the installer/contractor with those managing building safety and ensure that accurate, accessible records are maintained.

More broadly, stronger assurance would be achieved through the introduction of an industry-recognised standard, defined competency requirements, and robust inspection and certification processes, rather than reliance on notification alone.

b) For buildings outside the scope of the higher-risk regime:
Agree, Disagree, Don't know
Comments:

We consider that a post-completion notification requirement could support record-keeping and audit; however, in isolation it is unlikely to provide meaningful assurance or influence contractor behaviour. Given the anticipated volume of minor works, there is a risk that the relevant Building Control Authority would be unable to effectively monitor or enforce compliance through notifications alone. This may result in a process that creates a perception of oversight without delivering substantive assurance. In addition, without review or validation, there is limited incentive for contractors to consistently comply.

If such a requirement is to be introduced, it would need to be supported by a streamlined, standardised digital process (for example, a dedicated portal) to ensure it is practical and does not create disproportionate administrative burden. Information submitted should be minimal but sufficient to support the management of safety risks in non-HRBs, including location of works, confirmation of compliant fire-stopping, photographic evidence, and certification by a competent installer.

However, we consider that a more effective approach would be to align with existing principles such as Regulation 38, whereby contractors are required to confirm that relevant information has been provided to the Responsible Person or Accountable Person, and receipt is formally acknowledged with notification issued to the relevant building control authority. This would place accountability on both the installer/contractor with those managing building safety and ensure that accurate, accessible records are maintained. More broadly, stronger assurance would be achieved through the introduction of an industry-recognised standard, defined competency requirements, and robust inspection and certification processes, rather than reliance on notification alone.

Question 18

How should any notifications be submitted to the relevant building control authority?

Comments:

Digital portal

Question 19

Would the submission of a bulk notification for all work undertaken by a contractor once in each 6-month period be proportionate? What potential risks could this create? We would also welcome views as to whether an alternative period other than 6-months would be more appropriate, and why that would be the case.

Proportionate, Disproportionate, Don't know

Comments:

A pre-commencement notification approach would provide a more effective and proportionate mechanism than bulk post-completion reporting. Requiring contractors to notify the relevant building control authority through a digital portal at least one month prior to commencing works would improve transparency and provide a clear record of intent, while avoiding the need for formal approval processes. This would support more accurate tracking of works, as start dates are more likely to reflect actual delivery.

A six-month bulk notification approach introduces several risks. The delay in reporting may prevent timely identification of poor workmanship or non-compliant installations, allowing defects particularly in relation to fire-stopping and compartmentation to persist

across multiple properties. It also reduces traceability, making it more difficult to link specific works to locations, dates, and responsible contractors, and increases the risk of incomplete or inaccurate data being submitted in bulk.

We consider that this approach should align with the principles of Regulation 38, whereby contractors are required to confirm that relevant information has been provided to the Responsible Person or Accountable Person, and receipt is formally acknowledged. This ensures accountability sits with dutyholders while maintaining a clear and auditable record of works.

To support this, each set of works or each project should be assigned a unique reference number or identifier through the portal at the point of pre-commencement notification, which is then used consistently throughout the lifecycle of the works, including confirmation of completion and handover of information.

Question 20

In the case of higher-risk buildings, do you agree with our proposal that on completion of works, the person undertaking the work should continue to handover some 'golden thread' information, specifically BFLO information, to the accountable person for the occupied higher-risk building? If you disagree, please could provide evidence as to why this would not be proportionate? We would also welcome any views and evidence on the associated time and costs of producing/collating this information when work is completed.

Agree, Disagree, Don't Know

Comments:

Yes

Question 21

Do you think that it is proportionate to apply additional conditions (e.g. ensuring that the work meets relevant product safety standards, the work is time-limited and the person carrying out the work has appropriate skills or qualifications) to this proposal?

Proportionate, Disproportionate, Don't know

Comments:

We agree that it is proportionate to apply additional conditions to this proposal. While requirements relating to materials and workmanship are already established under Regulation 7 of building regulations, these are high-level principles and do not in themselves provide sufficient clarity or consistency for the delivery of these specific works in practice.

Additional conditions such as defined product standards, installer competence, and requirements for timely completion and reinstatement would help to operationalise these principles, ensuring a consistent and verifiable standard of installation. This is particularly important given the variability currently observed in fibre-optic installations and the absence of a recognised industry standard or competent persons scheme.

Applying such conditions would therefore support a proportionate approach by enabling reduced procedural oversight while maintaining appropriate levels of safety, compliance, and assurance.

Question 22

Is it reasonable to impose conditions related to the competence or qualifications of the person(s) undertaking the work? We would welcome suggestions of what level of competence, accreditation or qualifications the person carrying out the work should possess. If you disagree, please specify why you think this is unreasonable.

Yes, No, Don't know

Comments:

We agree that it is reasonable and necessary to impose conditions related to the competence and qualifications of those undertaking the work. Given the potential impact on fire compartmentation, installers should meet recognised competency standards relevant to both cable installation and passive fire protection.

This should include completion of accredited training in fire-stopping and installation practices (for example, schemes such as FIRAS, NAPIT, or equivalent), supported by appropriate certification. Competence should be maintained through periodic refresher training and, where applicable, ongoing accreditation or scheme membership to ensure standards remain current.

Establishing clear and consistent competency requirements would help drive improved installation quality, reduce variability across contractors, and provide greater assurance that works are carried out in compliance with building regulations.

Question 23

Is it reasonable to impose conditions related to product safety standards (e.g. the product used for firestopping holes)? We would welcome suggestions in the comments on what product safety standards should be required. If you disagree, please specify why you think this is unreasonable.

Yes, No, Don't know

Comments:

It is reasonable and necessary to impose conditions related to product safety standards. Where penetrations are made through fire-resisting elements, it is essential that fire-stopping materials form part of tested and certified systems to maintain compartmentation performance.

Products should be supported by appropriate third-party certification (e.g. UKCA/CE marking and recognised certification schemes such as UL-EU or equivalent) and be installed in accordance with manufacturer specifications. Systems used must be appropriate to the specific wall type, substrate, and penetration size.

Clear product standards will support consistency, reduce variability in installation quality, and provide greater assurance that works meet the functional requirements of the building regulations.

Question 24

Is it reasonable to impose as a condition a time limit between the work being started and completed, in the interests of managing building safety risk? If you agree, could you please suggest in the comments what a reasonable time limit would be. If you disagree, please could you provide views and evidence to why it would be unreasonable.

Yes, No, Don't know

Comments:

We consider that imposing a fixed time limit for the completion of works may not be proportionate. Existing regulatory duties already require that buildings are maintained in a safe condition at all times, and works should not be left in a state that compromises safety, particularly where fire-resisting elements are affected.

A rigid time limit may not reflect operational realities, such as variations in building size, complexity of installation, or external dependencies (e.g. civils works), and could inadvertently encourage rushed or substandard workmanship. This may increase, rather than reduce, safety risk.

A more proportionate approach would be to require that any penetrations are made safe at all times, including appropriate temporary or permanent fire-stopping, and that works are completed within a reasonable timeframe based on the specific scope and building context. This should be supported by clear expectations on maintaining safety throughout the works, rather than a fixed completion deadline.

Question 25

Do you have any views on additional or alternative conditions that should be considered for this proposal? Any conditions imposed need to be directly connected to the proposed dispensation.

Comments:

Additional conditions should focus on strengthening assurance at source, without introducing unnecessary procedural burden. This should include a requirement for contractors to operate under a recognised competency or third-party certification framework, ensuring that works are carried out by suitably qualified installers. In addition, contractors should be required to provide and retain basic quality assurance evidence, including pre- and post-installation photographic records, product details, and confirmation of compliant fire-stopping (e.g. certification labels).

To manage risk during delivery, penetrations should be reinstated and appropriately fire stopped immediately or within a clearly defined short timeframe, minimising any temporary reduction in compartmentation performance.

Finally, a proportionate level of as-built information should be produced and made available to the Responsible Person or Accountable Person. This should include records of installation, locations of penetrations, and confirmation that works have been completed in accordance with relevant standards, supporting the ongoing maintenance of the Golden Thread of information.

Question 26

In terms of conditions set for this proposal, where should responsibility sit for ensuring these are met? Our initial view is that responsibility for ensuring conditions are met should sit with the Principal Contractor
Comments:

The primary responsibility for ensuring conditions are met should sit with the Principal Contractor for Building Regulations, as they have control over the delivery of works, including sequencing, management of subcontractors, and quality assurance processes. However, this should be supported by appropriate oversight from the Client, Responsible Person, and Accountable Person to ensure that works are commissioned, monitored, and verified in line with required standards.

It is important to recognise that, in many cases, the Client may be the service provider rather than the housing association or building owner who holds the building and fire safety duties. As such, those dutyholders must retain appropriate visibility and control over the works.

This should include the ability for the housing association or relevant dutyholder to challenge, pause, or prevent works where there are concerns regarding compliance, safety, or adequacy of information. This ensures that accountability for building safety remains with those legally responsible, while delivery responsibility remains with the Principal Contractor.

Building work to mobile masts

Question 27
Do you think that the current procedural requirements of building control are reasonable for building work related to the installation and repair of mobile communication masts? In particular, we would welcome views on whether current procedures ensure that work complies with buildings regulation requirements while allowing the work to be carried out in reasonable timeframe and for a reasonable cost.

a) For buildings within scope of the higher-risk regime:
Reasonable, Unreasonable, don't know

Comments:

The current procedural requirements are appropriate in principle for building work related to the installation and repair of mobile communication masts, given the potential impact on structural loading, building fabric, and safety systems. Such works can present higher risks and therefore justify a greater level of scrutiny and oversight to ensure compliance with building regulations.

However, in practice, the current process can be complex and difficult for operators and contractors to navigate, which may lead to delays, increased costs, and additional administrative burden for landlords. This suggests that while the level of oversight is appropriate, there is an opportunity to improve clarity, guidance, and process efficiency

to support more effective and consistent delivery without compromising safety or compliance.

b) For building outside the scope of the higher-risk regime:
Reasonable, Unreasonable, don't know

Comments:

The current procedural requirements are appropriate in principle for building work related to the installation and repair of mobile communication masts, given the potential impact on structural loading, building fabric, and safety systems. Such works can present higher risks and therefore justify a greater level of scrutiny and oversight to ensure compliance with building regulations.

However, in practice, the current process can be complex and difficult for operators and contractors to navigate, which may lead to delays, increased costs, and additional administrative burden for landlords. This suggests that while the level of oversight is appropriate, there is an opportunity to improve clarity, guidance, and process efficiency to support more effective and consistent delivery without compromising safety or compliance.

Question 28
Do you think that this work is currently carried out in compliance with the safety requirements of building regulations by installers?

a) For buildings within scope of the higher-risk regime:
Yes, No, Don't Know
Comments:

We do not have sufficient visibility to confirm whether this work is consistently carried out in compliance with the safety requirements of building regulations. Installation and repair of mobile communication masts are typically undertaken by specialist operators and contractors, and landlords often have limited oversight of the detailed design and delivery of these works.

This lack of transparency creates uncertainty regarding compliance, particularly in relation to structural impacts and integration with existing building systems. Greater clarity on roles, responsibilities, and information-sharing requirements would support improved assurance and enable landlords to better understand and verify compliance.

b) For building outside the scope of the higher-risk regime:
Yes, No, Don't Know
Comments:

We do not have sufficient visibility to confirm whether this work is consistently carried out in compliance with the safety requirements of building regulations. Installation and repair of mobile communication masts are typically undertaken by specialist operators and contractors, and landlords often have limited oversight of the detailed design and delivery of these works.

This lack of transparency creates uncertainty regarding compliance, particularly in relation to structural impacts and integration with existing building systems. Greater clarity on roles, responsibilities, and information-sharing requirements would support improved assurance and enable landlords to better understand and verify compliance.

Question 29

What are the risks for residents/ building users if this work is not carried out in compliance with the requirements of building regulations?

Comments:

Where installation or repair of mobile communication masts is not carried out in compliance with building regulations, there are potential risks to both building safety and resident wellbeing. These may include structural risks associated with additional loading, leading to potential instability or falling debris, as well as damage to the building fabric such as water ingress, which can contribute to damp, mould, and deterioration of fire-resisting elements.

There is also potential for impacts on existing roof-mounted systems and safety features, including solar panels and electrical installations. The level of risk will depend on the nature and extent of the non-compliance. Risks are most significant where design, installation, or reinstatement is not carried out in accordance with technical requirements. Where works meet technical safety requirements but procedural requirements are not fully followed, the direct impact on resident safety is likely to be limited; however, such gaps may still reduce assurance and oversight.

Question 30

What are the risks for residents/building users if this work is not carried out in reasonable timeframes or for a reasonable cost?

Comments:

There are no direct building safety risks to residents or building users if mobile communication mast works are not carried out within specific timeframes or at a particular cost. The primary risks are indirect, relating to delays in the rollout or maintenance of mobile connectivity, which may affect access to communication services.

While this may impact wider policy objectives, such as the timely delivery of 5G infrastructure, it does not in itself present a material risk to building safety or resident wellbeing.

Question 31

If you are an industry member undertaking this work, how do you record and ensure your compliance with building regulations?

Comments:

n/a

Question 32

If you are an industry member, how do you regularly assess the competence and capability of those undertaking this type of work on behalf of your organisation?

Comments:

n/a

Question 33

If you are an industry member, how do you regularly quality assure the work undertaken by your organisation?

Comments:

n/a

Question 34

Do you think that industry has the appropriate competence and organisational capability to undertake this work with the reduced building control oversight proposed in the dispensation? Could you please provide views and evidence in the comments to support your answer.

Yes, No, Don't know

Comments:

We do not have sufficient visibility or technical expertise in the installation and repair of mobile communication masts to provide a definitive view on whether industry has the appropriate competence and organisational capability to undertake this work with reduced building control oversight. These works are typically delivered by specialist operators and contractors, and landlords often have limited involvement in the detailed design and delivery. As such, we would expect that any reduction in oversight is supported by clear competency requirements, recognised industry standards, and robust assurance mechanisms to ensure that safety and performance requirements are consistently met. In addition, the roles and expectations of the Accountable Person, Responsible Person, and building owner should be clearly defined, including requirements for oversight, information sharing, and verification of compliance. This would ensure that those with legal responsibility for building and fire safety retain appropriate visibility and control, and are able to discharge their duties effectively.

Question 35

Do you foresee any risk to the safety and performance of buildings, and by extension the safety of residents, that could arise from our proposal to dispense with the procedural requirements of building regulations for the installation and repair of mobile masts?

Comments:

There is potential for risk to the safety and performance of buildings, and therefore residents, if procedural requirements are fully dispensed with, particularly where works are not adequately controlled or documented. These risks may include structural impacts arising from additional loading, damage to building fabric, and insufficiently coordinated works affecting existing systems. There is also a risk that poorly documented installations could undermine the integrity of the Golden Thread of information. However, the level of risk will depend on the extent to which alternative controls are in place. Where works continue to be delivered in accordance with building regulations,

supported by contractual controls (such as leases and licences to alter), clear competency requirements, and robust assurance processes, the risks can be appropriately managed.

Overall, any dispensation should be accompanied by defined standards, clear roles and responsibilities, and requirements for documentation and verification to ensure that building safety and performance are not compromised.

Question 36

Do you think that it is reasonable to dispense with some of the building control procedural requirements for work related to mobile masts?

Yes, No, Don't know

Comments:

It may be reasonable to dispense with some building control procedural requirements for work related to mobile communication masts, but only where it can be clearly demonstrated that the works are low-risk and do not impact structural integrity, building fabric, or safety-critical systems. Given the potential risks associated with mast installations, including structural loading and interaction with existing building systems, we do not support a blanket reduction in procedural requirements. Any dispensation should be limited, risk-based, and supported by clear criteria, defined competency requirements, and robust assurance processes.

Question 37

Do you agree with our suggested proposal to dispense with the procedural requirements related to gateway two and to reduce the requirements of gateway three for work to mobile masts in higher-risk buildings? If you do not agree, please could you provide views and evidence in the comments section as to why the proposal is not reasonable. We would also welcome alternative suggestions for what a reasonable and proportionate approach could look like, in terms of dispensing with building control procedural oversight for the work, while maintaining safety and performance standards.

Agree, Disagree, Don't know

Comments:

We do not support a blanket dispensation from gateway two or a broad reduction of gateway three requirements for work relating to mobile masts in higher-risk buildings. While there may be scope for a more proportionate approach in limited, clearly defined low-risk scenarios, mobile mast works can affect structural loading, building fabric, roof-mounted assets, and the quality of building safety information. For that reason, continued procedural oversight remains appropriate where works have the potential to affect safety or performance.

A more reasonable approach would be a tiered, risk-based framework that distinguishes between minor, like-for-like or low-impact works and more complex interventions. Any reduced oversight should only apply where there is clear eligibility criteria, robust design information, defined competency requirements, and appropriate assurance arrangements, including inspection, certification, and handover of accurate as-built information. This would allow genuinely lower-risk works to proceed more efficiently while retaining necessary controls for works that could affect the safety and performance of higher-risk buildings.

Question 38

Do you agree with the scope of our suggested proposal? i.e. work related to the installation and repair of mobile communication masts only in higher-risk buildings)? If you do not agree, please could you provide views and evidence as to why the scope is not reasonable. We would also welcome views on whether the scope should be expanded or limited, and why?

Agree, Disagree, Don't know

Comments:

Limiting the proposal to work related to the installation and repair of mobile communication masts in higher-risk buildings is a reasonable starting point, given the different risk profile of these works and the need to test whether the proposed approach operates effectively in practice. However, any change should be subject to post-implementation review to assess whether it is delivering the intended outcomes, including maintaining safety, supporting compliance, and reducing unnecessary procedural burden.

If implemented, the scope should remain tightly defined and should not be expanded further unless there is evidence that the approach is working as intended and does not adversely affect building safety, performance, or the quality of building information.

Question 39

Should the scope of the dispensation be extended to other forms of work similar to the installation and repair of mobile masts? We would welcome views on other types of work that would be reasonable to include in the dispensation, how they differ or compare to the work to mobile masts, and why the current procedural requirements of building regulations are unreasonable for these other types of work.

Yes, No

Comments:

There may be scope to extend the dispensation to other similar low-risk rooftop works, particularly where the activity is routine, like-for-like in nature, and does not materially affect structural loading, roof integrity, weathering performance, or fire safety measures.

However, any extension should be tightly defined and limited to works with a predictable risk profile that are undertaken by competent specialist contractors working to established technical standards.

Works that introduce additional structural load, require intrusive fixings, or have the potential to affect the performance of the roof or other safety-critical elements should remain subject to existing procedural controls. In our view, the reasonableness of any extension should therefore depend on whether the work is genuinely minor, standardised, and capable of being delivered safely without reducing assurance over building safety and performance.

Question 40

Do you agree with our proposal that on completion of works, the person undertaking the work should have to handover some 'golden thread' information, specifically BFLO

information, to the accountable person for the occupied higher-risk building? If you disagree, please could you provide evidence as to why this would not be proportionate? We would also welcome any views and evidence on the associated time and costs of producing/collating this information when work is completed.
Agree, Disagree, Don't Know
Comments:

We agree that, in principle, relevant 'golden thread' information should be handed over to the Accountable Person, Responsible Person and Building Owner on completion of works, as this supports ongoing building safety management and ensures that accurate, up-to-date information is maintained.

However, we consider that this requirement could be effectively delivered through contractual mechanisms, with Client responsible for ensuring that appropriate information (including BFLO) is provided as part of standard project handover. This approach would avoid the need for additional regulatory burden while still achieving the intended outcome.

The time and cost associated with producing this information should be proportionate, as it should form part of normal project delivery and documentation processes. Where information is clearly defined and standardised, the administrative impact is expected to be limited.

Question 41
Do you agree that it is proportionate to apply additional conditions (i.e., ensuring that the work meets relevant product safety standards, the work is time-limited and the person carrying out the work has appropriate qualifications) to any dispensation?
Proportionate, Disproportionate, Don't know
Comments:

It is proportionate to apply additional conditions to any dispensation. While requirements relating to materials and workmanship are already established under Regulation 7 of the Building Regulations, these are high-level principles and do not in themselves provide sufficient clarity or consistency for the delivery of these works in practice.

Additional conditions such as defined product standards, installer competence, and requirements for appropriate reinstatement of works would help to operationalise these principles, ensuring a consistent and verifiable standard of installation. This is particularly important given the variability observed across contractors and the absence of a consistently applied industry standard.

Question 42
Is it reasonable to impose conditions related to the competence or qualifications of the person(s) undertaking the work? We would welcome suggestions in the comments on what levels of competence, accreditation or qualifications the person carrying out the work should possess. If you disagree, please specify why you think this is unreasonable.
Yes, No, Don't know
Comments:

It is reasonable to impose conditions related to the competence and qualifications of those undertaking the work, but this should be proportionate to the nature of the activity being carried out.

For works that have the potential to impact building safety—such as penetrations through fire-resisting elements and associated fire-stopping—installers should meet recognised competency standards relevant to passive fire protection and installation practices. This may include accredited training, certification, or membership of recognised schemes.

However, for lower-risk activities that do not affect fire or structural performance (for example, minor finishing or decorative works), such requirements may not be necessary. A proportionate, risk-based approach to competence requirements would ensure that safety-critical works are delivered by suitably qualified individuals, without introducing unnecessary requirements for low-risk tasks.

Question 43

Is it reasonable to impose conditions related to the product safety standards of work? We would welcome suggestions in the comments on what product safety standards should be required. If you disagree, please specify why you think this is unreasonable.

Yes, No, Don't know

Comments:

It is reasonable to impose conditions related to product safety standards, but this should be proportionate to the nature of the work being undertaken.

For works that have the potential to impact building safety such as penetrations through fire-resisting elements products should form part of tested and certified systems, with appropriate third-party accreditation, and be installed in accordance with manufacturer specifications to ensure performance is maintained.

However, for lower-risk activities that do not affect fire or structural performance, imposing detailed product safety conditions may not be necessary. A proportionate, risk-based approach to product standards would ensure that safety-critical works are appropriately controlled without introducing unnecessary requirements for low-risk tasks.

Question 44

Is it reasonable to impose as a condition a time limit between the work being started and completed, in the interests of managing building safety risk? If you agree, could you please suggest in the comments what a reasonable time limit would be. If you disagree, please could you provide views and evidence to why it would be unreasonable.

Yes, No, Don't know

Comments:

Imposing a fixed time limit between the start and completion of works may not be proportionate in all circumstances. Existing regulatory duties already require that buildings are maintained in a safe condition at all times, and works should not be left in a state that creates an uncontrolled safety risk, particularly where fire-resisting elements are affected.

A rigid time limit may not reflect operational realities, including variations in building size, complexity of works, and external factors such as supply chain issues or contractor availability. This could inadvertently encourage rushed or substandard workmanship, potentially increasing risk.

A more proportionate approach would be to require that works are planned and completed within a reasonable timeframe, with an emphasis on maintaining safety at all stages. Where time-based conditions are applied, these should be flexible and allow for justified delays, ensuring that quality and compliance are not compromised.

Question 45

Do you have any specific views on any additional or alternative conditions that should be considered? Any conditions that are imposed need to be directly connected to the proposed dispensation/relaxation.

Comments:

No.

Question 46

In terms of conditions set for this proposal, where should responsibility sit for ensuring these are met? Our initial view is that responsibility for ensuring conditions are met should sit with the Principal Contractor

Comments:

The primary responsibility for ensuring conditions are met should sit with the Principal Contractor for Building Regulations, as they have control over the delivery of works, including sequencing, management of subcontractors, and quality assurance processes.

However, this should be supported by appropriate oversight from the Client, Responsible Person, and Accountable Person to ensure that works are commissioned, monitored, and verified in line with required standards. It is important to recognise that, in many cases, the Client may be the service provider rather than the housing association or building owner who holds the building and fire safety duties. As such, those dutyholders must retain appropriate visibility and control over the works.

This should include the ability for the housing association or relevant dutyholder to challenge, pause, or prevent works where there are concerns regarding compliance, safety, or adequacy of information. This ensures that accountability for building safety remains with those legally responsible, while delivery responsibility remains with the Principal Contractor.

Scope

Question 47

We would also welcome views on whether the scope of our proposals should be expanded or limited, and why

Comments:

The scope of the proposal should remain limited at this stage and subject to review following implementation. Given the potential impact of these works on structural

performance, building fabric, and safety-critical systems, it is important that any dispensation is carefully controlled and applied only where risks are clearly understood and manageable.

A phased approach would allow the effectiveness of the proposals to be evaluated in practice, including their impact on safety, compliance, and delivery. Any future expansion of scope should be evidence-led and contingent on demonstrating that the approach maintains appropriate levels of assurance without adversely affecting building safety or performance.

Competent Persons Schemes

Question 48

Do you think that introducing a competent persons certification scheme would be proportionate for the installation of fibre optic cables? In particular, we'd like your view on what safeguards and processes would need to be in place in a new CPS in order to ensure compliance with building regulations. We would welcome any reflections or evidence to accompany your answer

Reasonable, Unreasonable, Don't know

Comments:

Introducing a competent persons certification scheme (CPS) for fibre-optic cabling would be proportionate if focused on safety-critical aspects. It should ensure clear competency standards, accredited training, use of certified products, and robust quality assurance with auditable records. With effective oversight and alignment to the Golden Thread, a CPS could improve consistency, compliance, and assurance while reducing reliance on building control procedures.

Question 49

Do you think that introducing a competent persons certification scheme would be proportionate for work relating to mobile masts? In particular, we'd like your view on what safeguards and processes would need to be in place in a new CPS in order to ensure compliance with building regulations. We would welcome any reflections or evidence to accompany your answer.

Reasonable, Unreasonable, Don't know

Comments:

A competent persons certification scheme (CPS) could be proportionate for mobile mast works if it reflects the higher-risk nature of these activities. The scheme should ensure strong technical competence, including relevant qualifications, training, and regular re-certification, alongside adherence to defined standards, certified products, and robust quality assurance processes. It should also require clear documentation and handover of information to support the Golden Thread, with strong governance, auditing, and accountability arrangements in place. If designed effectively, a CPS could provide consistent assurance while reducing reliance on building control procedures.

Additional Information

Question 50

Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts of this consultation.

Comments:

The current requirements increase costs through administrative burden, delays, and repeat access, while the proposed changes could improve efficiency and allow regulators to focus on higher-risk work. However, reduced oversight may create risks around installation quality, which should be mitigated through competency, product, and assurance conditions. Wider cost impacts, including resourcing and system changes, should also be considered to ensure a balanced, proportionate approach.

Question 51

Are you aware of any particular equalities impacts for these proposals?

Comments:

The proposals are likely to have a positive equalities impact. Improved delivery of digital infrastructure, including fibre-optic broadband and mobile connectivity, can particularly benefit groups who may be more reliant on digital services, such as disabled residents, older people, and lower-income households, by improving access to services, communication, and opportunities.

A consistent and proportionate approach across both higher-risk and non-higher-risk buildings would help avoid unintended disparities in access to improved connectivity.

In addition, fibre-optic infrastructure offers benefits in terms of reliability, security, and safety compared to legacy systems, supporting longer-term resilience. Overall, the proposals are expected to support greater digital inclusion, provided that safety and quality standards are maintained.

Question 52

How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity or foster good relations between people who share a protected characteristic and those who do not? Please provide evidence.

Comments:

Any potential adverse impacts can be mitigated through clear guidance, consistent standards, and robust assurance mechanisms, including competency requirements, product standards, and maintenance of Golden Thread information. These measures help ensure that works are delivered safely and consistently across all building types, including higher-risk buildings where vulnerable residents may be disproportionately represented.

Improving the speed and cost-effectiveness of delivering digital infrastructure can also advance equality of opportunity by increasing access to essential services such as healthcare, education, and employment, particularly for residents who are more reliant on digital connectivity.

These proposals should be supported by effective resident engagement, in line with established strategies such as the Building Safety Resident Engagement Strategy, ensuring

that residents are informed, their needs are considered, and communication is accessible and inclusive.

Question 53

Please provide any additional evidence on costs, risks and benefits which should be considered in an assessment of impacts of this consultation. Specifically, we would welcome information on:

- the estimated cost of current compliance per case and details of these costs.
- the estimated cost of compliance of the proposed reforms per case and details of these costs.
- how long you estimate it would take to comply with the proposed reforms.
- which professions would be performing the work to comply with the proposed reforms.

We estimate current compliance costs at approximately £1,300 - £3,200 per case, including building control fees (£300-£700), structural engineering input (£450-£1,200 where required), contractor delays (£400-£1,000), and dutyholder administrative costs (£150-£300). These processes can extend programme timelines by several weeks, depending on approval and inspection times.

Under the proposed reforms, costs are expected to reduce significantly, with compliance primarily limited to notification, quality assurance, and record-keeping, which would be minimal in comparison. The time required to comply would reduce from several weeks to a short administrative activity (e.g. hours to a few days) rather than formal approval processes.

The work would typically be undertaken by ICT contractors, specialist installers (including fire-stopping), and Principal Contractors, with structural or fire engineers involved where works are more complex.