

Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

26 May 2026

To Whom It May Concern,

I am writing on behalf of the Chartered Institute of Building (CIOB) in response to the Ministry of Housing, Communities and Local Government's (MHCLG) [consultation on improving proportionality and building safety outcomes in building control: categorisation of higher-risk building work](#). This letter provides our formal written response to the consultation and sets out the views and concerns of CIOB in respect of this consultation alone.

As the world's largest and most influential professional body for construction management and leadership, we have a Royal Charter to promote the science and practice of building and construction for the benefit of society, a mission we have pursued since 1834. Our 51,000 members work globally in the development, conservation, and improvement of the built environment.

CIOB has been active in driving building safety reform, particularly following the publication of the Building Safety Bill – which became the Building Safety Act 2022 on 28 April 2022 and then into force on 1 October 2023.

Our views are shaped by the work of our Quality Implementation Group (QIG) which exists to help CIOB respond to the changing regulatory environment and provide education and support to our members and the wider industry. The QIG also plays a key role in raising standards and promoting best practice in construction quality, providing resources to help further education in the field where appropriate.

CIOB has welcomed many of the recent changes to the building safety regime, including moving responsibility for the Building Safety Regulator (BSR) into MHCLG, the introduction of multidisciplinary teams and amendments to the system to ensure that applications are dealt with in a timely manner to avoid unnecessary and costly delays in the construction process.

We recognise that the contents of this consultation set out additional measures to be taken to reduce the burden on the BSR and ensure that certain works within existing higher-risk buildings (HRBs) are not subject to over-regulation. Whilst CIOB has always advocated for a cautious approach to building safety, we recognise that the scope of this consultation is limited.

However, while we support the intention to improve the proportionality of the system and remove some works solely to the inside of an individual residential unit from the list of Category A works, we do still have some concerns with the proposals set out in the consultation.

These concerns are outlined below:

- The supporting information provided within this consultation sets out a clear case about the extent that the BSR has been burdened by an unexpectedly large number of non-cladding remediation Category A work applications. The supporting information states that... “as of February 2026, the BSR has received 1,944 non-cladding remediation Category A work applications.” It further states that “this is roughly 5 times the number than the BSR expected to fall into Category A”.

Whilst these are useful statistics to provide context to the argument that the BSR is being slowed down by work that may be deemed ‘non-critical’ and could be moved into Category B work which would require less rigorous regulation, the supporting information provides no clarity as to how many of these 1,944 applications would be moved into Category B should the proposals in this consultation come into force. Therefore, it is difficult to understand how much of an impact these changes would have had to the size of received Category A applications should they have been made at the start of the current building safety regime. Further clarity on this point would be useful and help inform consultation responses.

- **Option 1: Exclude building work within individual flats from Category A** – CIOB broadly supports the intention to remove certain works to individual flats from within Category A. We understand that this move would ensure that individual flat owners within residential HRBs would not need to navigate some of the more costly and time-consuming aspects of the building safety regime when undertaking minor works. We also appreciate that a confirmed list of the types of building work that would be excluded from Category A has been provided.

However, we disagree with the proposal to remove “building work to fire doors within a flat” from the list of excluded building work. The proposals, as they stand, suggest removing work on fire doors within a flat “because of the limited

implications on the safety of the wider building and residents”. Correctly installed, maintained and monitored fire doors, even those limited to use inside of an individual residential unit, make up an important part of the wider safety ‘system’ of a building. Each component of a wider system acts to ensure that the building remains safe, regardless of its position in a building. With that in mind, we believe that proper rigor and scrutiny should be applied to the modification or alteration of each component, fire doors included. Therefore, we would be keen to see fire doors removed from the list of works now excluded from Category A.

- **Option 2: Amend Category A work to exclude small-scale building work in communal areas** – Our view on Option 2 is consistent with our view on Option 1, that fire doors should not be included in the list of works excluded from Category A. This point is even more important in reference to work on fire doors in communal areas as the integrity of fire doors will play an important role in reducing the spread of fire through communal areas to other residential units. Additionally, the reference to fire doors in Option 2 includes the working “single fire door set”, further emphasising the importance of fire doors to the overall safety system.

Further to the concern highlighted above, additional clarity is needed on the metrics being used to define ‘small-scale’ work to communal areas in this section. At present the metrics include work that “can typically be undertaken by a team of 3 or fewer people, can typically be completed within 5 working days (i.e. 40 hours) and does not impact active fire safety measures (for example, fire alarm, CO detectors, sprinkler systems), load-bearing walls, or external walls (excluding building work to windows)”. Whilst we do not directly disagree with the notion that ‘small-scale’ work must meet all these criteria to be removed from Category A, no explanation has been provided as to why the number of people or period of time has been chosen. Further rationale is needed here to provide a firm response.

Whilst the concerns highlighted above do raise additional questions and points to consider as these proposals develop, it must be worth noting there are several areas in this consultation which represent a positive development of the building safety regime. Specifically, the provision of clear lists of works that do not do not fall into the scope of exclusion from Category A is positive. Too often the industry is left to interpret the rules and make its own decision, leading to wasted time and resource. The inclusion of lists in this manner should be taken forwards wherever possible.

Additionally, the contents of this consultation demonstrate that the building safety regime is a live system that is constantly under-review, responds to change and challenges and listens to feedback from residents and the wider industry. This should be commended.

Thank you for the opportunity to contribute to this consultation. We would welcome the opportunity to meet the team responsible for this consultation to discuss our feedback in more detail, and to explore how CIOB can support MHCLG in engaging with industry to ensure that all views are taken into account. We would also be pleased to continue supporting the development of the building safety regime where possible.

Yours sincerely,

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