Construction Leadership Council

Building Control for a new Higher-Risk Building

Guidance Suite

Construction Leadership Council

NOTE 1: This guidance was drafted to support making applications for Building Control Approval (Gateway 2) and Completion Certificate (Gateway 3) for a new Higher-Risk Building (HRB). The principles supporting a clear and comprehensive application are common for all types of building work. It may, therefore, also be useful for work in an existing HRB in particular category A work. Some of the elements may also be relevant for category B work.

NOTE 2: This document contains separate guidance notes. Each of these are version controlled and dated. When updates are carried out, the specific guidance note will receive a new version control number and date.

This guidance suite has been produced in collaboration between the Construction Leadership Council, industry stakeholders and the Building Safety Regulator. It provides the baseline principles to guide those involved in submitting and assessing applications for Building Control Approval (Gateway 2) and Completion Certificate (Gateway 3) for Higher-Risk Buildings.

This guidance may go further than the minimum you need to do to comply with the law with regard to building safety.

About the Construction Leadership Council

The Construction Leadership Council (CLC) brings together all parts of the construction industry and government. Its mission is to provide leadership and coordination to enable the construction sector to improve its performance, benefiting both the private and public sectors. By convening an industry partnership, the CLC provides the means to address short-term and long-term issues that affect the construction sector. The CLC's four strategic priorities are: Building Safety; Net Zero and Biodiversity; People and Skills; and Next Generation Delivery.

The CLC is co-chaired by Minister of State at the Department for Business and Trade and the Department for Energy Security and Net Zero, Chris McDonald MP and Mark Reynolds, Mace Group Executive Chairman. The Deputy Co-Chair is Richard Robinson, AtkinsRéalis, President – Asia, Middle East and Australia.

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Directory of Guidance

This document brings together a suite of guidance notes for Building Control Approval (Gateway 2) and Completion Certificate (Gateway 3) applications for a new Higher-Risk Building. All guidance notes and wider information are summarised in the table below. Links are provided for all content, and further information can be accessed via the CLC website.

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Build UK guidance is also available in relation to:

- Validation of Applications for Building Control Approval
- Gateway 3: Applying for a Completion Certificate

SUFFICIENT LEVEL OF DESIGN

Construction Leadership Council

SUFFICIENT LEVEL OF DESIGN	Guidance Note: 02 Version: 2.0 Date: 18/12/25

SUMMARY

This guidance note outlines how an applicant should approach the sufficient level of design for Building Control Approval for a new Higher-Risk Building or stage of Higher-Risk Building work.

An applicant seeking Building Control Approval at Gateway 2 must submit a clear and comprehensive application.

An application must demonstrate that the functional regulatory requirements of the Building Regulations can and will be met.

There remains flexibility in the application process to take account of the modern design and construction process of a Higher-Risk Building project.

A Building Control Approval application can seek either:

- **Approval; or where appropriate**
- **Approval with Requirements.**

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 03 - Building Control Approval with Requirements**
- **CLC Guidance Note 04 - Application Information Schedule**
- **CLC Guidance Note 08 – Staged Applications**

Further guidance is also available on the CLC website.

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB) an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. This guidance sets out how an applicant, either the client or someone authorised to act on their behalf, should approach the sufficient level of design detail for Building Control Approval.

1.3. The design process is complicated and traditionally on large projects, it takes place over a long period, usually overlapping with the construction process.

1.4. Historical issues with the previous Building Control regime included, amongst others, that designs were often lacking in detail to evidence compliance with the functional requirements of the **Building Regulations 2010** (as amended), or that the completed design would be compliant.

1.5. The new building safety regime for HRBs has brought a fundamental shift in the principles of the Building Control Approval application process. Applicants are required to provide significant design information before construction begins. If done correctly this should not pose a problem to the success of an application.

1.6. An applicant should be clear on the level of design information required to provide a robust Building Control Approval application to the Building Safety Regulator (BSR) at Gateway 2, whilst still allowing for flexibility in the modern design and construction process for a HRB.

1.7. The principles of design sufficiency apply to **Staged Applications**. CLC guidance on **Staged Applications** provides further information.

2. SUFFICIENT LEVEL OF DESIGN DETAIL

2.1. An application for Building Control Approval should provide quality detailed information that clearly and comprehensively demonstrates how the design and construction of the HRB will comply with the Building Regulations.

2.2. A Building Control Approval application can seek either:

- **Approval** - Provision of sufficient design of the building to evidence compliance with all applicable functional requirements of the Building Regulations; or where appropriate
- **Approval with Requirements** - Provision of sufficient design to evidence compliance that the building can and will meet with all applicable functional requirements of the Building Regulations even though certain

aspects of the design detail remain outstanding at that time and will be submitted later in accordance with an agreed plan.

2.3. **Approval with Requirements** is available for use by the Regulator, where the applicant is seeking Building Control Approval at Gateway 2, where otherwise an application may be rejected. It is the applicant's responsibility to present the items to be considered for Approval with Requirements in a clear and comprehensive proposal (plan) to the BSR for agreement.

2.4. Specific CLC guidance is provided on **Building Control Approval with Requirements** and the recommended use of an **Application Information Schedule**.

2.5. The baseline to any Approval with Requirements approach is that the **initial Building Control application needs to show sufficient information to allow the BSR to be satisfied** that the finished building can and will comply with the Building Regulations even though certain aspects remain outstanding at that time.

2.6. Design sufficiency needs to be taken to a point where performance to the requirements of the functional requirements of the Building Regulations can be confidently confirmed without having to have a particular product specified or absolute final detailed drawings/documents provided. This is eminently possible especially where there are several manufacturer's products that have the relevant tested performance and can be used in the layout and dimensional limits set by the submitted building plans.

2.7. Approaching design in this way also aims to ease the regulatory burden on both the applicant and BSR by reducing the need for multiple change records and approvals that would be otherwise required during the construction phase.

2.8. If Approval with Requirements for an element or package is granted then it remains the applicant's responsibility to continue to plan, manage and monitor the delivery of any remaining design elements during the construction phase in accordance with the Construction Control Plan.

2.9. It is illegal for any work to commence before both a full design is submitted for the specific Requirement and approval is given by the BSR to proceed on that aspect of the work.

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BUILDING CONTROL APPROVAL WITH REQUIREMENTS

BUILDING CONTROL APPROVAL WITH REQUIREMENTS	Guidance Note: 03 Version: 2.0 Date: 18/12/25

SUMMARY

This guidance note outlines how an applicant should approach and manage the use of Approval with Requirements for a Building Control Approval application for a new Higher-Risk Building or stage of Higher-Risk Building work.

Approval with Requirements can be used for two purposes:

- **To enable approval of an application with a minor error or minor omission in design; or**
- **As a response to an applicant's proposal.**

An applicant seeking Approval with Requirements must provide a clear and comprehensive proposal (plan) to the Building Safety Regulator for agreement alongside the main application.

The proposal must demonstrate that the completed building can and will comply with the functional requirements of the Building Regulations, and how and when the information forming the Approval with Requirements elements will be provided.

Where Approval with Requirements is granted, an applicant must plan, manage and monitor the delivery of any remaining design elements.

Construction work is not allowed to commence on any specific element unless a full design is submitted and approved for that element by the Building Safety Regulator.

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 02 - Sufficient Level of Design**
- **CLC Guidance Note 04 - Application Information Schedule**
- **CLC Guidance Note 08 – Staged Applications**

Further guidance is also available on the CLC website.

BUILDING CONTROL APPROVAL WITH REQUIREMENTS

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB) an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. This guidance sets out how an applicant, either the client or someone authorised to act on their behalf, should correctly approach and manage the use of **Approval with Requirements for a Building Control Approval application (Gateway 2)**.

1.3. Historical issues with the previous building control regime included, amongst others, that designs were often lacking in detail to evidence compliance with the functional requirements of the **Building Regulations 2010** (as amended), or that the completed design would be compliant.

1.4. Under the previous legislative regime, it was possible, under section 16 of the Building Act 1984, to either pass, reject or, subject to the applicant's consent, pass plans with conditions.

1.5. Prior to the Grenfell Tower tragedy, Building Control had met the inadequacy of some building designs to demonstrate the functional requirements of the Building Regulations, with the use of the Conditional Approval mechanism to set out conditions which were a list of omissions and solutions.

1.6. These conditions at times amounted to providing a specification which is not the role of a regulator. This played into the general misunderstanding that Building Control took responsibility for ensuring compliance and thus led to abdication of that responsibility from elements of the design/construction team.

1.7. It was not the legislation that was the problem but the way in which it was used. Hence the mechanism remains.

1.8. The new **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023** allow for decisions by the Building Safety Regulator (BSR) in respect to applications for Building Control Approval to either be **Approval, Rejection or Approval with Requirements** depending on given circumstances.

1.9. **Approval with Requirements** is available for use by the BSR, where the applicant is seeking Building Control Approval at Gateway 2, where otherwise an application may be rejected. It is the applicant's responsibility to present the items to be considered for Approval with Requirements in a clear and comprehensive proposal (plan) to the BSR for agreement.

1.10. The principles of AWR apply to **Staged Applications**. CLC guidance on **Staged Applications** provides further information.

2. THE PRINCIPLES OF APPROVAL WITH REQUIREMENTS

2.1. A Building Control Approval application (Gateway 2) can seek either:

- **Approval** - Provision of sufficient design of the building to evidence compliance with all applicable functional requirements of the Building Regulations; or where appropriate
- **Approval with Requirements** - Provision of sufficient design to evidence compliance that the building can and will meet with all applicable functional requirements of the Building Regulations even though certain aspects of the design detail remain outstanding at that time and will be submitted later in accordance with an agreed plan.

2.2. Approval with Requirements can be used for two purposes:

- **To enable approval of an application with a minor error or minor omission in design** – Where the application contains a minor error or omission and the BSR is satisfied that it can be dealt with by a simple agreement with the applicant.
- **As a response to an applicant's proposal** – The applicant provides a clear and comprehensive application that demonstrates that the building will comply with the Building Regulations and includes a plan for submission of further Approval with Requirements design, including a timeline for delivery. This Approval with Requirements plan will be set out in the Building Regulations Compliance Statement and appropriately referenced in the Construction Control Plan. The BSR may grant Approval with Requirements if they are satisfied with the plan.

2.3. The baseline to any progressive application process (Approval with Requirements) is that the initial application needs to show suitable and sufficient information to allow the BSR to be satisfied that the finished building can and will comply with the Building Regulations even though certain design aspects remain outstanding at that time.

2.4. When seeking Approval with Requirements it is the applicant's responsibility to prepare and submit with the main application a clear and comprehensive **Approval with Requirements Plan** to the BSR for agreement.

2.5. Approval with Requirements cannot be used to obtain approval to proceed with inadequate design. Such applications will be rejected.

2.6. It is not for the BSR to provide design solutions or set out or manage the applicant's progressive application process.

3. BUILDING CONTROL APPLICATION SEEKING APPROVAL WITH REQUIREMENTS

3.1. The new building safety regime for HRBs has brought a fundamental shift in the principles of the Building Control Approval process. There should be sufficient design information in the Building Control Approval Application to evidence compliance with the Building Regulations. This means design needs to be programmed for delivery much earlier than has happened in the past.

3.2. **Approval with Requirements does provide some flexibility but should be used only when appropriate.** If Approval with Requirements is granted, the corresponding design detail should be submitted for approval as early as possible in the construction phase.

3.3. An applicant is required to submit:

a) The Building Plans (and other documents) which must demonstrate that the performance levels required by both the prescriptive (e.g. Building Regulation 7(2)) and functional / relevant requirements (e.g. the Building Regulations Schedule 1) can and will be met. It is not enough to simply state "We will meet the Regulations".

b) All mandatory documents set out in the legislation. CLC guidance on the **Building Safety Regime for a new Higher-Risk Building** provides further information.

c) An **Approval with Requirements Plan** which is set out in the Building Regulations Compliance Statement and appropriately referenced in the Construction Control Plan. As a minimum it should detail:

- Which parts of the design is Approval with Requirements being sought;
- The reasons why these items are required to be subject to Approval with Requirements;
- Further design detail information to be issued to demonstrate compliance; and
- A timetable for when the further specifications/information will be submitted.

3.4. The use and submission of an **Application Information Schedule** is recommended. The Schedule provides an easy to navigate information framework aligned with the requirements of Building Regulations (**Schedule 1**).

4. MANAGEMENT OF APPROVAL WITH REQUIREMENTS

4.1 If Approval with Requirements is granted by the BSR then it is the responsibility of the applicant to continue to plan, manage and monitor the delivery of any remaining design elements during the construction phase in accordance with the Construction Control Plan.

4.2 It is essential that both the applicant and BSR understand the status of the Building Control approval at any one time for every aspect of the design and what information still needs to be submitted. The Approval with Requirements plan, including the timeline submitted at the application stage must be followed.

4.3 It is illegal for any work to commence on the specific element subject to a Requirement before a full design is submitted and approved by the BSR.

4.4 An applicant should contact their BSR case officer for details of how to submit the information necessary to fulfil a Requirement.

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APPLICATION INFORMATION SCHEDULE

Construction Leadership Council

APPLICATION INFORMATION SCHEDULE	Guidance Note: 04 Version: 2.0 – 18/12/25 Annex 4A: 1.0 – 21/07/25

SUMMARY

This guidance note outlines the baseline design information to be submitted for a Building Control Approval application for a new Higher-Risk Building.

An applicant must submit a clear and comprehensive application that demonstrates that the functional requirements of the Building Regulations can and will be met.

The use and submission of an Application Information Schedule is recommended. The Schedule provides an easy to navigate information framework aligned with the requirements of the Building Regulations 2010 (Schedule 1).

An example schedule is provided. The schedule lists the baseline design information that should be provided in an application to help achieve the necessary standards for a successful assessment and approval by the Building Safety Regulator.

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 – The Building Safety Regime for a new HRB**
- **CLC Guidance Note 02 – Sufficient Level of Design**
- **CLC Guidance Note 03 – Building Control Approval with Requirements**
- **CLC Guidance Note 06 – Application Document Management and Submission**

Further guidance is also available on the CLC website.

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB) an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. The applicant, either the client or someone authorised to act on their behalf, should submit and manage a new HRB - Building Control Approval application (Gateway 2) **online** to the Building Safety Regulator (BSR).

1.3. An application for Building Control Approval should provide quality, detailed information that clearly and comprehensively demonstrates how the design and construction of the HRB will comply with the **Building Regulations 2010** (as amended). This should be done through:

- **Identifying** - every aspect of the project that requires compliance with Building Regulations, including structural and fire safety.
- **Clarifying** - which standard, code or approach will be used to demonstrate compliance, with an explanation of why it is the most appropriate.
- **Justifying** - how the functional requirements have been met, with clear and comprehensible narrative referring to suitably labelled plans and drawings.

1.4. Design information for an application should be provided in an easy to navigate framework aligned with the requirements of the Building Regulations (**Schedule 1**).

1.5. This guidance relates to the baseline design information that must be submitted for a Gateway 2 Building Control Approval application.

1.6. It is recommended that an applicant uses and submits an **Application Information Schedule**. This is not a required statutory document, but it is a tool that can assist in navigating application information.

1.7. The Schedule can provide a clear and logical summary of all the design information submitted. This can support the applicant, either the client or someone authorised to act on their behalf, to submit a comprehensive application. It also aids the BSR and appointed Multi-Disciplinary Team (MDT) to navigate the design information in the application.

2. GATEWAY TWO APPLICATION INFORMATION SCHEDULE

2.1. An **Application Information Schedule** is recommended to be submitted with the application.

2.2. The objectives of the Application Information Schedule are to:

- Signpost the sub-folders/files to the Approved Documents;
- Identify the entity responsible for the providing the design;
- Provide guidance on the sufficiency of the design for a Building Control Approval application and the proposed information that may be provided for Approval with Requirements.

2.3. The BSR online application portal now provides for the information to be provided with an application to be uploaded in a folder, sub-folder and file structure at the time of the application.

2.4. It is recommended that the applicant should submit the Application Information Schedule as a file in a sub-folder named "**General Application Information**", and upload this sub-folder at the Drawings and Plans stage of the BSR online application portal. CLC guidance on **Application Document Management and Submission** provides further information.

2.5. **Annex 4A** provides an example of an Application Information Schedule.

3. HOW TO USE AN APPLICATION INFORMATION SCHEDULE

3.1. An Application Information Schedule provides an easy to navigate information framework aligned with the requirements of Building Regulations (**Schedule 1**).

3.2. The Schedule is divided into three columns: 1) Approved Documents; 2) Information provided with the application; and 3) Information provided with Approval with Requirements.

3.3. It is key that each file listed within both columns 2 and 3 are referenced and allocated to the respective Approved Document.

3.4. Each file should be allocated only once to the **primary** Approved Document and not to multiple Approved Documents.

3.5. Files can be identified with the File Reference Number and File Title. For example - 2.1.1 (file reference number) Architectural Plans, Sections and Elevations (file title).

3.6. It is an applicant's decision on how to name and structure file references and titles.

End of Note 04

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APPLICATION PROJECT BRIEF

APPLICATION PROJECT BRIEF	Guidance Note: 05 Version: 2.0 – 18/12/25 Annex 5A: 1.0 – 21/07/25

SUMMARY

This guidance note outlines the importance of providing a clear, concise and informative summary description of the project as part of a Building Control Approval application for a new Higher-Risk Building or stage of Higher-Risk Building work.

The Building Safety Regulator online application portal requires completion of the Description of Work. This information is used to support the engagement of the appropriate Registered Building Inspector and other Multi-Disciplinary Team (MDT) specialists.

The use and submission of an Application Project Brief is recommended. The Brief includes the Description of Work and the wider context of the essential features and complexity of the building(s).

An example Application Project Brief is provided.

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 06 - Application Document Management and Submission**
- **Build UK – Validation of Applications for Building Control Approval**

Further guidance is also available on the CLC website.

APPLICATION PROJECT BRIEF

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB), an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Building Control Completion (Gateway 3). The documents required for a valid application are set out in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. The applicant, either the client or someone authorised to act on their behalf, should submit and manage a Building Control Approval application (Gateway 2) **online** to the Building Safety Regulator (BSR). The documents required for a valid application are set out in **Build UK - Validation of Applications for Building Control Approval**.

1.3. The online application portal requires submission of documents and plans, and the completion of a number of text fields, including **Description of Work**. This is a compulsory field requiring a summary (free flow text, maximum 2000 characters) about the proposed project.

1.4. The purpose of the Description of Work field is for the provision of a clear and concise summary of the key elements of the development. The BSR uses the Description of Work to identify the correct people with the right skills, knowledge and experience to join the Multi-Disciplinary Team (MDT) for the application i.e. to Local Authorities or Registered Building Control Approvers when sourcing the Registered Building Inspector (RBI) support and other expert resource that may be required in assessing the application. The description text is therefore of significant importance to support the engagement of the appropriate specialist team.

1.5. To date, applications through the online portal have included a variety of inputs for the Description of Work, some only provide basic text such as '8 storey residential'. This is not sufficient.

1.6. It is recommended that an applicant uses and submits an **Application Project Brief** with the main application. This guidance outlines a suitable approach.

1.7. The principles of a Project Brief apply to **Staged Applications**. CLC guidance on **Staged Applications** provides further information.

APPLICATION PROJECT BRIEF

2. APPLICATION PROJECT BRIEF

2.1. The **Application Project Brief** is a summary document which provides an easy to navigate clear, concise and informative description of the project.

2.2. It allows the MDT to quickly understand the proposed project in a standalone document and provides the Description of Work but also the wider context of the essential features and complexity of the building(s).

2.3. The Application Project Brief and should be appropriate to the size and complexity of the project and outline key points including the:

- Description of Work;
- Project team;
- Description of the development;
- Description of the development programme; and
- Key information about the building(s).

2.4. It should be made clear in the Project Brief, if the application is part of a series of applications for either a wider, multi-building development or a single building staged application. This will allow BSR to allocate work appropriately.

2.5. If an application is rejected and then re-submitted, the Project Brief should reference the previous application reference e.g. Rejection Explanation of BCA01234567. This highlights the previous rejection and allows the MDT to focus on rejection reasons addressed in new application.

2.6. It is recommended that the applicant should submit the Application Project Brief as a separate file in a sub-folder named "**General Application Information**" and upload this at the Drawings and Plans stage of the BSR online application portal. CLC guidance on **Application Document Management and Submission** provides further information.

2.7. The Description of Work should also be copied into the online portal text field.

2.8. **Annex 5A** provides an example Application Project Brief including a Description of Work.

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APPLICATION DOCUMENT MANAGEMENT AND SUBMISSION

APPLICATION DOCUMENT MANAGEMENT AND SUBMISSION	Guidance Note: 06 Version: 2.0 – 18/12/25 Annex 6A: 2.0 – 11/12/25

SUMMARY

This guidance note outlines best practice for document management and submission to the Building Safety Regulator online application portal for a Building Control Approval application (Gateway 2) or stage of Higher-Risk Building work. It includes the:

- **principles of good document management;**
- **use of folder and sub-folder structures;**
- **use of file naming conventions; and**
- **submission of other recommended documents including an Application Folder structure and Contents Schedule and Application Information Schedule.**

An example of an Application Folder Structure and Contents Schedule is provided.

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 03 - Building Control Approval with Requirements**
- **CLC Guidance Note 04 - Application Information Schedule**
- **CLC Guidance Note 08 – Staged Applications**
- **Build UK - Validation of Applications for Building Control Approval**

Further guidance is also available on the CLC website.

APPLICATION DOCUMENT MANAGEMENT AND SUBMISSION

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB) an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. The applicant, either the client or someone authorised to act on their behalf, should submit and manage a new HRB - Building Control Approval application (Gateway 2) **online** to the Building Safety Regulator (BSR). This requires submission of an application and supporting documents (and plans). The documents required for a valid application are set out in **Build UK - Validation of Applications for Building Control Approval**.

1.3. Clear and logical document organisation within the application submission not only contributes to a clear and comprehensive application but provides an easy to navigate framework for the BSR and their Multi-Disciplinary Teams (MDTs) to assess compliance.

1.4. This guidance note outlines best practice for document management and submission for a Building Control Approval application.

1.5. The principles of application document management and submission apply to **Staged Applications**. CLC guidance on **Staged Applications** provides further information.

2. PRINCIPLES

2.1. Information for an application should be provided in an easy to navigate framework aligned with the relevant legislation.

2.2. The document structure should set out a clear hierarchy of folders, sub-folders and files.

2.3. A clear naming convention for folders, sub-folders and files should be followed.

2.4. Submitting more documents than is needed will not mean that the application is better, in fact it may lead to the need for a longer assessment process.

2.5. Consistent information structures, references, arrangements and formats should be used for each stage of a **Staged Application**.

3. USE OF FOLDER AND SUB-FOLDER STRUCTURES

3.1. The BSR online application portal has been updated with a new functionality, to allow applicants to submit documents in a folder structure. This offers greater flexibility on presentation of the application and allows related documents to be clustered.

3.2. Within the portal, an applicant is prompted to upload the Accompanying Documents as files into separate pre-set folders.

3.3. At the **Drawings and Plans** stage on the portal, an applicant is now able to upload sub-folders. Sub-folders should be created on an applicant's own system and simply uploaded when requested by the portal.

3.4. The number of sub-folders should be proportionate but there are no constraints on sub-folder creation or the number of files within each sub-folder.

3.5. **Annex 6A** provides an example folder and sub-folder structure that may be used through an **Application Folder Structure and Contents Schedule**.

3.6. Sub-folders can be any size but should only contain PDFs. Other file types cannot be uploaded.

3.7. Sub-folder names should only use letters, numbers, spaces, hyphens and underscores. Do not use special characters.

4. FILE NAMING CONVENTIONS

4.1. A file reference should be clearly identifiable.

4.2. A file must be:

- PDF format;
- Smaller than 1GB; and
- Named using only letters, numbers, spaces, hyphens and underscores. Do not use special characters.

4.3. Use a clear file title describing what a document or plan relates to. The aim is to avoid a file needing to be opened to identify what it is.

4.4. If a document is referred to in legislation, then use this exact wording as a clear file name (e.g. Target Emissions Rating).

4.5. Non-statutory recommended documents (e.g. Application Project Brief) should also be clearly titled.

4.6. Typical file names that should be used are:

File Titles - Statutory Documents	File Titles - Non-Statutory Documents
Site Plan	Application Folder Structure and Contents Schedule
Drawings and Plans	Application Information Schedule
Competence Declaration	Application Project Brief
Construction Control Plan	Application Strategy
Change Control Plan	
Mandatory Occurrence Reporting Plan	
Building Regulations Compliance Statement	
Fire and Emergency File	
Partial Completion Strategy	
Client Authorisation Statement	

5.1. The CLC guidance suite recommends a number of additional documents that can be used and submitted to support an application:

- Application Folder Structure and Contents Schedule;
- Application Information Schedule;
- Application Project Brief; and
- Application Strategy.

5.2. An applicant can submit these files in a sub-folder titled **General Application Information** and upload these at the Drawings and Plans stage of the BSR online application portal.

6. APPLICATION FOLDER STRUCTURE AND CONTENTS SCHEDULE

6.1. An **Application Folder Structure and Contents Schedule** is a recommended file to be submitted with the application.

6.2. The aim of the Schedule is to set out the overall structure of the application into folders, sub-folders and files. This will enable the BSR and MDT to navigate and easily locate all the information submitted.

6.3. It is recommended that the applicant should submit this file in a sub-folder named **General Application Information** and upload this at the Drawings and Plans stage of the BSR online application portal.

6.4. **Annex 6A** provides an example of an Application Folder Structure and Contents Schedule that may be used. (The Schedule size and complexity will be project specific).

7. APPLICATION INFORMATION SCHEDULE

7.1. An **Application Information Schedule** is a recommended file to be submitted.

7.2. The objectives of the Application Information Schedule are to:

- Signpost the sub-folders/files to the Approved Documents;
- Identify the entity responsible for providing the design;
- Provide guidance on the sufficiency of the design for a Building Control Approval application and the proposed information that may be provided for Approval with Requirements.

7.3. It is recommended that the applicant should submit this file in a sub-folder named **General Application Information** and upload this at the Drawings and Plans stage of the BSR portal.

7.4. Further guidance is provided in the CLC guidance note **Application Information Schedule**.

8. SUBMITTING A REQUEST FOR FURTHER INFORMATION

8.1. On receipt of a Request for Further Information (RFI), an applicant should follow specific instructions on how to provide and submit the information. This information will not be re-submitted through the online portal.

8.2. An updated **Application Folder Structure and Contents Schedule** must be provided with any new files submitted. It should highlight the:

- New file or a file which has been amended;
- New revision(s); and
- New or existing sub-folder(s) that the file would relate to.

8.3. This tracking of updated or new information is imperative to allow the BSR to distribute this to the correct MDT members.

9. LINKED APPLICATIONS

9.1. Where an application is linked to another in any way, these should be cross-referenced using application reference numbers.

10. REJECTED APPLICATIONS

10.1. If an application is rejected, the new application should reference the rejected application reference number e.g. Application name – Resubmission of BCA01234567.

End of Note 06

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APPLICATION STRATEGY - FOR A SINGLE BUILDING STAGED APPLICATION OR APPLICATIONS FOR A MULTI-BUILDING DEVELOPMENT

Construction Leadership Council

APPLICATION STRATEGY - FOR A SINGLE BUILDING STAGED APPLICATION OR APPLICATIONS FOR A MULTI-BUILDING DEVELOPMENT	Guidance Note: 07 Version: 2.0 – 18/12/25 Annex 7A: 1.0 – 21/07/25

SUMMARY

This guidance note outlines the use of an Application Strategy for either a single building staged Building Control Approval application or applications for a multi-building development.

Early engagement with the Building Safety Regulator on these types of applications is recommended. An Application Strategy can be submitted as part of this engagement.

There is no prescribed timeframe for contacting the Regulator or the submission of an Application Strategy. It is recommended that this is no shorter than 6 months prior to the application date.

This proactive engagement approach by the applicant provides oversight and comprehension of the proposed complex project, along with a considered approach in line with the Building Control Approval process.

The Building Safety Regulator will use the Strategy to inform engagement on the staged/multiple application(s), understand the pipeline of work and allocate resources appropriately.

An example Application Strategy is provided.

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 06 – Application Document Management and Submission**
- **CLC Guidance Note 08 – Staged Applications**

Further guidance is also available on the CLC website.

APPLICATION STRATEGY - FOR A SINGLE BUILDING STAGED APPLICATION OR APPLICATIONS FOR A MULTI-BUILDING DEVELOPMENT

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB) an applicant must pass through three gateway points: Planning (Gateway 1) (hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. The applicant, either the client or someone authorised to act on their behalf, should submit and manage a new HRB - Building Control Approval application (Gateway 2) **online** to the Building Safety Regulator (BSR).

1.3. For complex projects that involve a building with multiple connected parts, an applicant may apply for a **staged application**. A staged application is when the building work is divided into different stages, allowing for a phased approval process by the BSR. Each stage:

- is treated and assessed as if it were an application for a separate building;
- must not start until the BSR approves the work; and
- can start or finish on the same date, or different dates, as other stages.

1.4. This approach will also be useful for a complex project involving multiple buildings.

1.5. An applicant is recommended to contact the BSR before submitting a staged application or multiple building applications. An **Application Strategy** can be submitted as part of this engagement and this guidance outlines a suitable approach.

1.6. The Application Strategy relates to the overarching application approach and is not to be used to explain the design principles or design approach to the application.

1.8. The principles of an Application Strategy apply to **Staged Applications**. CLC guidance on **Staged Applications** provides further information.

2. APPLICATION STRATEGY

2.1. The Application Strategy is a summary document outlining the overarching Building Control Approval application approach for a proposed complex project, including a timeline. Where a project is proposing a partial completion strategy this should also be included within the document.

2.2. This proactive engagement approach by the applicant provides oversight and comprehension of the proposed complex project, along with a considered overarching staged application approach in line with the Building Control Approval process.

2.3. The Application Strategy informs engagement by the BSR, providing awareness of forthcoming applications, the complexity of a project and proposed approach to be taken by the applicant.

2.4. **Annex 7A** provides an example Application Strategy.

2.5. For multi-building developments an applicant should use a consistent name for the project with an identifier for each application (i.e. Greenwood Park, Building 3 of 6) to ensure future sequential referencing of applications by the applicant and BSR.

2.6. Early engagement is recommended however there is no prescribed timeframe for contacting the BSR or the submission of an Application Strategy. Some applicants may benefit from contacting the BSR prior to Planning Gateway 1, others may choose to engage 6-12 months prior to a Building Control Approval application (Gateway 2).

2.7. To discuss a staged application or multiple applications, an applicant should contact the BSR via the **online contact form**. The BSR will ask for details of the application proposal as part of arranging a pre-application meeting. The use and submission of an Application Strategy is recommended to provide the appropriate details.

2.8. For continuity the Application Strategy can also be submitted in the BSR online application portal in a sub-folder named **General Application Information** and uploaded at the Drawings and Plans stage of the BSR online application portal. CLC guidance on **Application Document Management and Submission** provides further information.

2.9. When an applicant starts a Building Control Approval application using the online service, they will be prompted to confirm it is a staged application. If 'yes' is selected then further information will be required. Details of the procedures to be followed and the information required for a staged application can be found on **GOV.UK**.

End of Note 07

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STAGED APPLICATIONS

STAGED APPLICATIONS	Guidance Note: 08 Version: 1.0 – 18/12 /25 Annex: 8A 1.0 – 18/12/25 Annex: 8B 1.0 – 18/12/25 Annex: 8C 1.0 – 18/12/25 Annex: 8D 1.0 – 18/12/25

SUMMARY

This guidance note outlines the way in which applications for Building Control Approval can be approached in stages.

Staged applications were initially anticipated for complex buildings with multiple towers (blocks) on a shared podium or basement where design development for some blocks continued beyond the initial application. However, any given block within a stage was expected to be submitted as a full application.

Staged applications can now also be used to sub-divide the submission for an individual building/block. This enables some initial groundworks and basement works to be approved and commenced before full design details for the rest of the building/block are submitted. For a simple building this would normally be no more than two stages. For a complex building this could be two or more stages.

Staged applications will need to show that works for that stage are fully detailed and comply with the Building Regulations 2010 and must include a summary of plans and standards being adopted for the subsequent stage(s). Approval With Requirements can be used within a stage of a staged application.

Examples are provided of:

- **Common scenarios for Staged Applications**
- **A Staged Work Statement**
- **A Subsequent Stages Statement**
- **A Summary of Design Principles and Building Standards**

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 02 - Sufficient Level of Design**
- **CLC Guidance Note 03 - Building Control Approval with Requirements**
- **CLC Guidance Note 04 - Application Information Schedule**

Further guidance is also available on the CLC website.

1. INTRODUCTION

1.1. Building Control Approval for building work in connection with Higher-Risk Buildings (HRBs) has been changed to address systemic industry shortcomings identified in the **Building a Safer Future** report by Dame Judith Hackitt. It is now not only important that applicants explain the technical details of what they intend to build but also how they intend to manage and provide evidence of compliance with the **Building Regulations 2010** throughout the design and construction processes.

1.2. There are two mechanisms provided for in the legislation for delivering flexibility in the Building Control Approval system – **Approval with Requirements (AWR)** and **Staged Applications**. These are separate mechanisms but may be used together. **CLC Guidance Note 03** provides information in respect of AWR.

1.3. This guidance note sets out the suggested content that should be provided in an application for Building Control Approval (Gateway 2) for a **stage of HRB work** if constructing an HRB in accordance with Regulations 3 and 4 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**.

1.4. Common scenarios which are representative of typical new build residential HRB developments are considered. They illustrate stage splits in the context of the requirement for the first stage of works to meet the commencement threshold under Regulation 46A of the Building Regulations 2010. Other scenarios are possible though. The scenarios are illustrated in section 3 and **Annex A**.

1.5. Staged applications follow a logical sequence, requiring detailed information for the current application stage with summary and principal information for subsequent stages. Linking the information between each stage is key. The sequence is illustrated in section 5.

2. REQUIREMENTS OF THE HRB REGULATIONS

2.1. For a staged application, Regulation 4 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**, sets out what should be included in a Building Control Approval application (Gateway 2) for HRB work. Regulations 4(1) and 4(2) include information required for all applications. Regulation 4(3) includes additional requirements if the application is for a stage of HRB work.

2.2. In summary the HRB Regulations provide that an application for a **first stage of work** must include **all the information and documents** that would be provided for a single stage Building Control Approval application **but with additional information as outlined below:**

- A **Staged Work Statement**;
- **Plans** which contain enough information to show that the first stage of work will comply with all the applicable requirements of the Building Regulations 2010;
- A **Summary of Plans** for the work beyond the first stage into a second or more subsequent stages;
- The **Building Regulations Compliance Statement** which must set out the design principles and building standards to be applied to the work for the first stage; and
- The Building Regulations Compliance Statement must also include a **Summary of the Design Principles and Building Standards** to be applied beyond that stage.

2.3. In summary, an application for a **subsequent stage of work** must again include **all the information and documents for a single stage HRB application but with additional information as outlined below**:

- A **Subsequent Stages Statement**;
- **Plans** as necessary to show that the work comprised in the stage to which the application relates would comply with all applicable requirements of the Building Regulations 2010;
- For projects where more than two stages are appropriate (see notes in section 4), a **Summary of Plans** for any work beyond the stage to which the application relates;
- The **Building Regulations Compliance Statement** must set out the design principles and building standards to be applied to the work comprised in the stage to which the application relates; and
- For projects where more than two stages are appropriate (see notes in section 4), the Building Regulations Compliance Statement must also include a **Summary of Design Principles and Building Standards** to be applied to any work (the next stage(s)) beyond the stage to which the application relates.

2.4. Examples of documents are provided:

- **Annex B** – Staged Work Statement
- **Annex C** – Subsequent Stages Statement
- **Annex D** – Summary of Design Principles and Building Standards.

3. DEFINITION OF WORK COMMENCEMENT FOR STAGED APPLICATIONS

3.1 Whilst the lapse of Building Control Approval has existed since 1984 under the **Building Act**, the **Building Regulations etc.(Amendment) (England) Regulations 2023** provide for this lapse to be automatic if after 3 years the work has not reached a prescribed state of progress.

3.2 The **prescribed state** is referred to in the **Building Regulations 2010** as the point at which the building is to be regarded as commenced for the purpose of the lapse regulation (and hence the lapse does not occur).

3.3 Insofar as HRB work is concerned, there are **two prescribed states detailed in Building Regulation 46A**, one for a complex building and another for a non-complex building.

3.4 For a complex building the point of legal commencement (the prescribed state) is that the foundations and structure of the lowest floor of the building have been completed.

3.5 For a non-complex building the point of legal commencement (the prescribed state) is that all structure up to and including the ground floor slab has been completed.

3.6 A **Commencement Statement** for a HRB is a document that needs to be submitted with the Building Control Approval application and this document requires the Client to state the date when construction work is planned to reach the prescribed state.

3.7 Therefore, it is suggested that, in the case of using the **Staged Application**, that the least amount of work in the first stage is the same as that in the prescribed state i.e. foundations and structure of the lowest floor of the building and the Commencement Statement will therefore give details of the date at which it is planned to complete that stage.

3.8 Completion of this first stage then means that the whole building is regarded as commenced and the standards applicable at the time of the first stage submission will remain applicable for subsequent stages applications. However, if the commencement threshold is not met for the first stage, the building work will be subject to updated requirements, introducing design and compliance risks.

3.9 Note that the definition of commencement varies by project type, and differs between complex buildings, horizontal extensions, or other types.

3.10 **Annex A** provides examples and diagrams of typical new build residential HRB scenarios to understand the use of Staged Applications and the application of Regulation 46A in relation to stage applications. These examples are summarised:

- **Scenario 1 - Non-complex building under Regulation 46A**. This would meet the minimum threshold of works to meet the definition of commencement because it consists only of piles and retaining wall. This is therefore not suitable.
- **Scenario 2 - Complex building under Regulation 46A (part of a combined basement).** Full design for the block 1 basement and block 1 within stage 1, with block 2 basement and full block as stage 2. Stage 1 meets the threshold required for commencement under Regulation 46A for a complex building.
- **Scenario 3 - Complex building under Regulation 46A (foundation and lowest slab of a shared basement).** Full design for foundations and lowest slab to block 1 in stage 1, remainder of foundations and lowest slab and block 1 and block 2 as stage 2. Meets the threshold required for commencement under Regulation 46A for a complex building.
- **Scenarios 4A and 4B - Non-complex buildings under Regulation 46A (single building with or without basement)**. Full design for the structure up to ground floor slab as stage 1, either ground floor slab or basement and ground floor slab. Everything else on the building as stage 2. Meets the threshold required for commencement under Regulation 46A for a non-complex building.

4. SCOPE AND USE OF STAGED WORK APPLICATIONS

4.1. For a project with a single block, an applicant may wish to split the application into two stages. The first stage will be the substructure - foundation (and basement if applicable). The second (subsequent) stage would be all other works to complete the project.

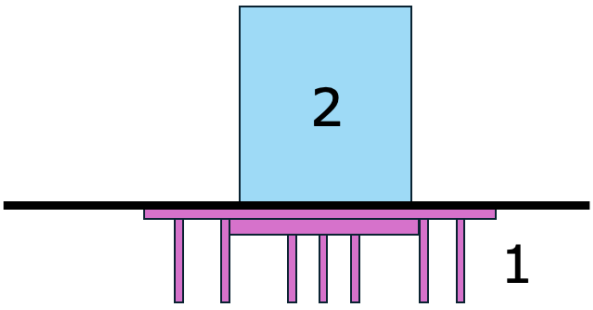


Diagram 1: A single block divided into two stages

4.2. For complex buildings, for example a podium with multiple towers, an applicant will be faced with several options and may decide to split the substructure from the rest of the superstructure, and then may further split the superstructure into individual blocks or grouped blocks as further stages.

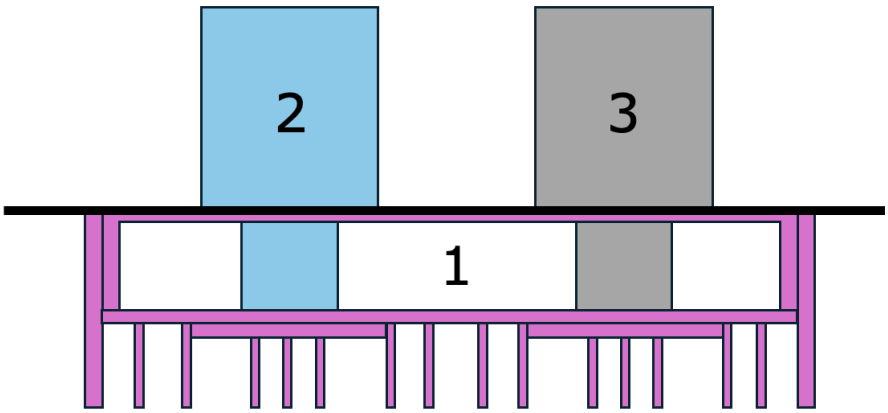


Diagram 2: A complex development with podium base and two blocks divided into three stages

4.3. Staged applications should not be used to subdivide Building Control Approval Applications (Gateway 2) into individual works packages as this can lead to a lack of rigorous and holistic coordination between building packages, resulting in a risk of compliance issue.

4.4. It is vital that sufficient design development is reached and evidenced so that problems are not baked into the design that may compromise the compliance of the building once complete.

4.5. It is advised that the Applicant carries out a project delivery assessment to demonstrate a clear understanding of the implications of a staged approach and the risks to compliance. The Assessment should identify the level of design information that is required to ensure compliance of work in the relevant stage(s) and to evidence a strategy for ensuring the subsequent stage application(s) will also be compliant.

4.6. This assessment should be presented in a concise format and should form part of the **Staged Work Statement**. An example is set out in **Annex B**.

4.7. Each project is unique, and a client should ensure their project is assessed by the project team to determine the appropriate staged application strategy.

4.8. The Building Safety Regulator (BSR) at this point is unlikely to consider a staged application where the first stage is the substructure and superstructure frame, as this would require the design to be advanced to such a stage to negate the value of a staged application.

5. LEVEL OF DESIGN DETAIL WITHIN EACH STAGE APPLICATION

5.1. This section considers the necessary level of detail **within** an application for a stage of work. The discussion uses the example of the application for a first stage of work, but the principles of use of detail, **Approvals with Requirements (AWR),** relationship of design to work contained within subsequent stages, **Fire and Emergency File (FEF)**, and summaries of subsequent stages are relevant to all applications for a stage of work.

Sufficient level of design within the first stage of an application

5.2. The information and level of detail provided for works within the first stage of an application should be to the same level as if included for a full single application – i.e. detailed design information to demonstrate compliance and obtain Building Control Approval. AWRs could be used where certain information is identified as appropriate to follow after approval is granted and agreed. Please note that the use of AWR is always subject to agreement with the BSR.

5.3. The first elements of build works are predominantly structural (foundations and substructure) and may therefore be addressed in the first stage application. The information would typically comprise of:

- The below-ground structural design in full, to meet the definition of commencement of works;
- Mechanical Electrical and Public Health (MEP) services and architectural design in full which directly impacts structural compliance; and
- Sufficient detail supplemented with an AWR for MEP and architectural design which do not directly impact on structural compliance, extents subject to risk assessment.

5.4. The Applicant should note that the demonstration of the design compliance for elements within the first stage application will likely be conditioned by the performance, configuration or spatial requirements for elements within the subsequent stages. Examples of this are:

- Plant rooms containing a sprinkler tank are located and sized to allow the structure to be designed for the correct load and wall positions but the final sprinkler tank and associated equipment products to be used may not be known and therefore would be subject to AWR.
- The basement smoke clearance solution must be developed such that the design of the primary ventilation openings in the structure can be formed, with the design for all items such as service sleeves and builders work provided in full but the final detailed specification for the smoke fan specification might not be known and would be subject to AWR.

5.5. Under Regulation 4(2) of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**, all applications, including staged applications, are required to include a **Fire and Emergency File (FEF)**. While the Regulations do not mention modifications of the FEF; it is recognised that practically the FEF in an application for the first stage of work may not be as detailed as if making a single full application.

5.6. For a staged application the FEF submitted with each and every stage should:

- Focus upon the application being made;
- Meet the standard for a normal FEF;
- Contain proportionate amount of information for the subsequent phases to demonstrate that the overall design will meet the requirement of the regulation; and
- Set out the assumptions made in relation to the intended occupiers of the building and their likely characteristics and behaviours, and how these influence the design.

Sufficient level of information for the Subsequent Stages Works (contained in the first stage application)

5.7. The level of design information and detail to be provided in the first stage application for the second and further stages (if any) should be sufficient to describe the overall building and proposed route to demonstrate compliance with the Building Regulations 2010. It should include a summary of plans for the work beyond that stage and a summary of the design principles and building standards to be applied beyond that stage described in Regulation 4 of the Building (Higher-Risk Buildings Procedures) (England) Regulations 2023. This would typically comprise of:

- Architects General Arrangement plans and elevations showing the overall building massing, form and façade;

- Confirmation of the building use and finishes (loads) at each floor level;
- Structural General Arrangement framing plans showing the structure continuing down to foundations; and
- A summary of the design principles and building standards to be adopted with suitable justification that these will be appropriate and will meet the functional requirements of Building Regulations. This should be provided as part of the current stage Building Regulations Compliance Statement.

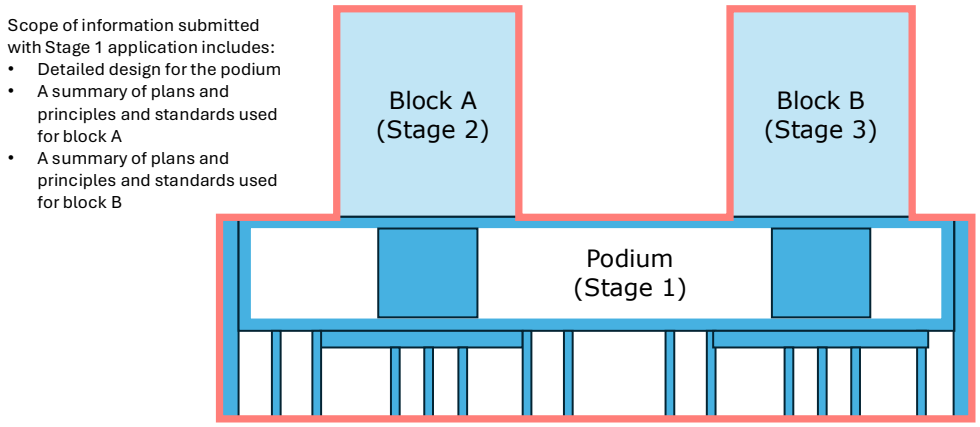
Sufficient sequence and logic required for a staged application with three or more stages

5.8. When the first stage works are being carried out, the applicant may wish to make an application for the second stage of the works. These works would normally relate to 1 block or more blocks of full superstructure works, to include all structure, MEP services, cladding, finishes, external works.

5.9. The principles outlined above in relation to the sufficient levels of design would apply to this second stage application.

5.10. The principles outlined above relating to the level of information for the subsequent stage(s) works would also apply to stage 3 and stages beyond (if any).

5.11. The diagrams below illustrate the sequencing of stages:



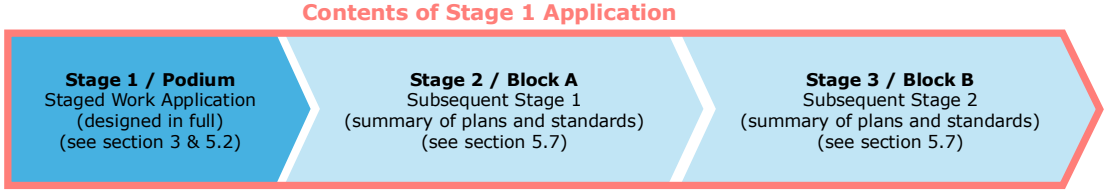
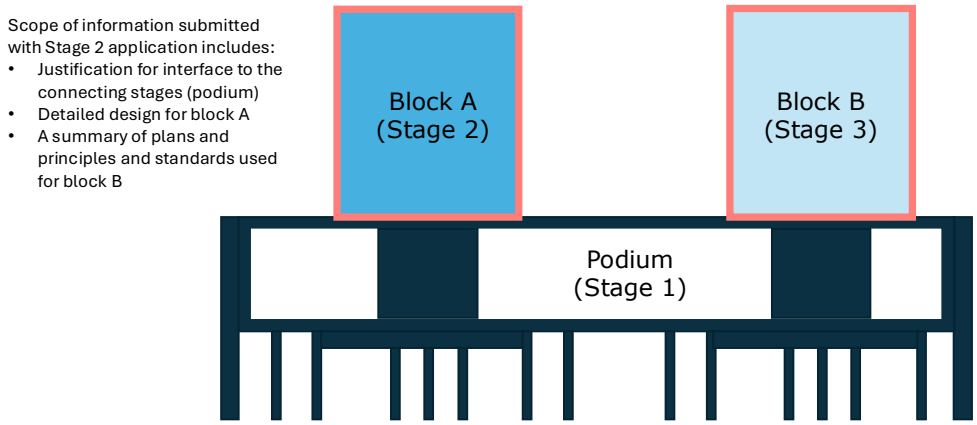


Diagram 3: Arrangement and information for the first stage application of a Staged Application with three stages



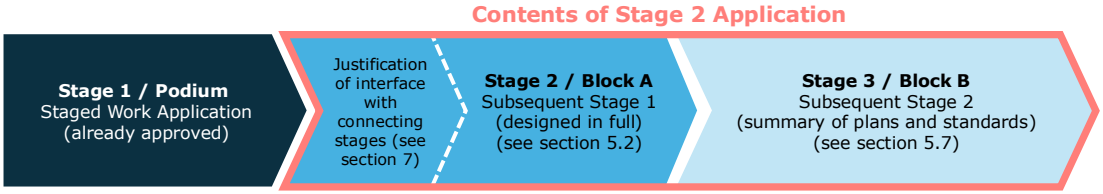


Diagram 4: Arrangement and information for the second stage application of a Staged Application with three stages

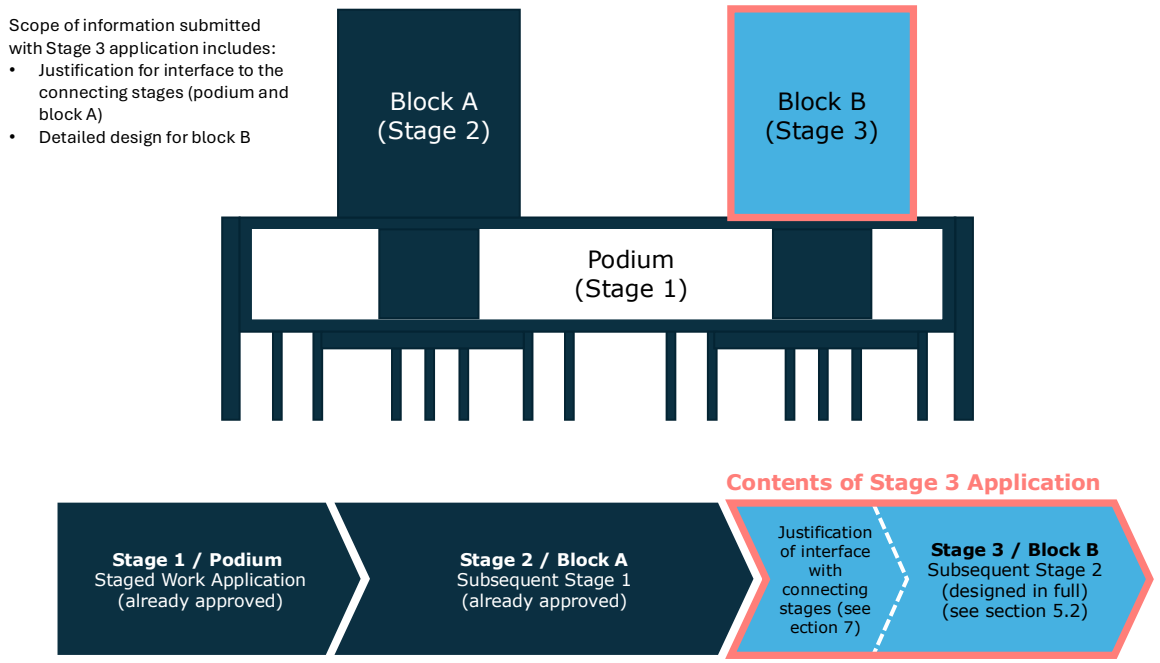


Diagram 5: Arrangement and information for the third stage application of a Staged Application with three stages

6. DOCUMENT CHANGE CONTROL PROCESS

6.1. Regulations under the **Building Safety Act 2022** introduced a mandatory change control process into the building control and construction procedures.

6.2. Any document accepted within the Building Control Approval becomes an **Agreed Document** and the change control process applies to any proposal to change anything in an agreed document.

6.3. In regard to staged applications the documents that relate directly to the stage of work become Agreed Documents and therefore the requirements for change control apply to that work and those agreed documents. Regulations 18 to 26 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023** set out requirements.

6.4. The information submitted to give a summary of the design principles and building standards to be applied beyond the previous stage will also be regarded as agreed. Therefore, any changes to these documents or the strategies described in them should also be regarded as controlled change and the relevant process should be followed. Details of the changes should also be stated in the Building Regulations Compliance Statement submitted for further stages as relevant.

7. CONSISTENCY AND LINKAGE OF INFORMATION BETWEEN STAGES

7.1. As part of each subsequent Building Control Approval Stage application, a clear and concise justification should be provided to demonstrate alignment with the previous application stage. This ensures both the applicant and the BSR can understand and connect the different stages together.

7.2. The Applicant as a minimum should:

- Cross-check the current stage application design against the summary of plans and summary of standards submitted in the previous stage application(s);
- Explain how elements previously presented at summary level have been developed into detailed proposals in this stage, consistent with the previously submitted summary of plans and summary of standards parameters; and
- Confirm and evidence compatibility between the first stage design and the subsequent stage(s) design and follow this logic through the second stage design and subsequent stage(s) design until approval of the final stage application.

7.3 The BSR **online application portal** includes an entry to identify that an applicant is submitting part of a staged application during the submission process for a Control Approval (Gateway 2). When the initial Stage 1 application is submitted to the BSR, the applicant needs to provide details of how many stages are planned. This initial application is allocated a reference number. This number should be referenced for all subsequent stage(s).

7.4 There is no formal close out process for any stage of HRB work. The final stage of work is the conduit for a Building Completion Certificate. As the project progress through the final stage construction phase, the Client should prepare key documentation for two purposes:

- To enable the handing over information to those who will be responsible for the management of the building during occupation as detailed in Regulation 38 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**; and
- To support the Completion Certificate Application (Gateway 3) as required in Regulation 40 of **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**.

7.5 **Guidance Note 09 Gateway 2 to Gateway 3** provides further information on this process.

End of Note 08

GATEWAY 2 TO GATEWAY 3	**Guidance Note: 09** **Version: 1.0 - 18/12/25** **Annex 9A – 18/12/25** **Annex 9B – 18/12/25** **Annex 9C – 18/12/25** **Annex 9D – 18/12/25**

SUMMARY

This guidance note outlines key steps for dutyholders and the Building Safety Regulator between Building Control Approval (Gateway 2) and Completion Certificate (Gateway 3) for a new Higher-Risk Building.

It also details the importance of progressive assurance of building regulation compliance between post approval, construction phase and completion. The information collated between each forms part of the Golden Thread and provides key evidence for a clear and comprehensive Completion Certificate application.

Examples are provided of:

- **a Building Safety Regulator Inspection Schedule;**
- **a Registered Building Inspector Inspections Process Map; and**
- **a Schedule of Information to be submitted as part of the Completion Certificate Application.**

NOTE: This guidance note should be read in conjunction with:

- **CLC Guidance Note 01 - The Building Safety Regime for a new HRB**
- **CLC Guidance Note 03 - Building Control Approval with Requirements**
- **CLC Guidance Note 04 - Application Information Schedule**

Further guidance is also available on the CLC website.

1. INTRODUCTION

1.1. Under the new Building Safety Regime for a new Higher-Risk Building (HRB), an applicant must pass through three gateway points: Planning (Gateway 1) (Note: at Gateway 1 hospitals and care homes are excluded from the definition of a relevant building); Building Control Approval (Gateway 2); and Completion Certificate (Gateway 3). This process is summarised in the **Building Safety Regime for a new Higher-Risk Building**.

1.2. As part of this new regime, an applicant must not only explain the proposed design and construction work, but also the arrangements they will put in place to manage and evidence compliance with the **Building Regulations 2010** throughout the project. During post approval and the construction phase, the planning, monitoring and recording of evidence should be a progressive process. This helps form the **Golden Thread** and provides key evidence for the **Completion Certificate application (Gateway 3)**.

1.3. This guidance note sets out how the Client and Principal Contractor (PC), might proceed with their works following a successful Building Control Approval application and to assist them to prepare a suitable and sufficient application for a Completion Certificate.

1.4. It may also be of value to other contractors and dutyholders involved in the procurement, design, construction, and record-keeping processes as well as the Building Safety Regulator (BSR) and inspection bodies overseeing compliance.

1.5. Many of the requirements are placed legally on the Client, including the provision of information to support the completion certificate application and to deliver the Golden Thread. In practical terms these requirements will often be administered by the PC on behalf of the Client.

1.6. **Annex A** provides a high-level summary of the key steps to be taken in the post approval, construction and completion phases by the Client/PC and BSR. Further detail is provided for each phase.

2. POST APPLICATION

Building Control Approval

2.1. When Building Control Approval or Approval with Requirements is granted – the following is confirmed:

- **The outputs from the Building Control Approval (inspection schedule, clarity on any requirements);**
- **That the Accompanying Documents from the application become legally referred to as the Agreed Documents;**
- **That the management arrangements approved at Gateway 2 as set out in the Construction Control Plan (Construction CP) must be put into practice;**
- **The roles, responsibilities and duties. (Client, PC, BSR as the regulator, Registered Building Inspector (RBI), and any other person authorised by BSR to carry out activities such as inspection that inform the regulatory decisions made by BSR.)**

Approval with Requirements

2.2. If the Building Control Approval application (Gateway 2) has been given **Approval with Requirements**, work in relation to these Requirements must not be started without the prior approval of the BSR. The applicant must fully understand each requirement and crucially the scope and timeframe for delivering the information to obtain the approval of each Requirement.

2.3. The dates for submission of the Requirements information to the BSR will have been set out in the plan agreed with the BSR and be clearly indicated on the Building Control Approval Notice along with a description of the work.

2.4. An applicant should contact their BSR case officer for details of how to submit the information necessary to fulfil a Requirement. It is likely that the RBI assigned to the project will be the person who confirms that the Requirements have been satisfied and approved, but you should agree this process with the BSR at the Gateway 2 approval stage.

Agreed Documents

2.5. The basis of the Completion Certificate Application (Gateway 3) is the Building Control Approval (Gateway 2), all related Approval with Requirements items and items processed through change control. When Building Control Approval is granted the **Accompanying Documents** submitted as part of the application become the **Agreed Documents**. Through the construction phase any changes to

the contents of the Agreed Documents (including the approved design) must be logged in the **Change Control Log** in accordance with the **Change Control Plan (Change CP)**. The simple equation is:

Agreed Documents + Change Control Log = Completion Certificate Application (Gateway 3)

2.6. The Completion Certificate application should also include as built records of the plans (drawings, design information, specifications and other documents) incorporating any changes made to the plans approved at Gateway 2. These plans must be supported by further evidence demonstrating the quality of the works completed during the construction phase. This as built information should be an accurate record of the completed as built condition construction work, supported by assurance audits from the PC and RBI that the information being issued at handover to the **Relevant Person** is of the required quality.

BSR Inspection Schedule

2.7. As part of the Building Control Approval at Gateway 2 the applicant should receive an inspection schedule that has been developed by the MDT based on an assessment of the project in relation to both the complexity of the approved building work and the adequacy of the approved management arrangements. It will include planned and unscheduled inspections as required.

2.8. The BSR will use people with the appropriate Skills, Knowledge, Experience and Behaviours (SKEB) to carry out inspections. It is likely that most site inspections will be carried out by the same RBI. It is expected that the PC would be involved in every site inspection and where appropriate, representatives from any contractors directly involved in the work being inspected at that visit. Information from every inspection will be assessed and used to review the inspection schedule and inform any regulatory activity. The BSR has to take the advice of a suitably registered RBI before carrying out any restricted function (Building Control functions).

2.9. The BSR, based on their risk assessment of the project, may wish to inspect multiple substages of the works. Examples of this might be in relation to reinforcement installation, fire stopping or internal partitions at different floor levels within the building.

2.10. The process for and scope of inspections is not prescriptive, and may include construction works, Agreed Documents, Change Control Log and other Golden Thread information.

2.11. **Annex B** provides an example format for a BSR Inspection Schedule which outlines the dates for specified points of the HRB work to be inspected by the RBI.

2.12. **Annex C** provides a detailed RBI Site Inspections Process Map which outlines the steps necessary to administer inspections in the construction phase. This provides a helpful timeline of the key steps an applicant should expect.

Progressive Assurance

2.13. The **Construction CP** submitted as part of the Building Control Approval application will set out the scope and content of information that should be provided for a Completion Certificate application. The implementation of this plan should start immediately after Building Control Approval and continue throughout the project. Post approval, the client and the contractor and design teams should plan how the Gateway 3 evidence will be progressively collected, by who and who needs to play any part in the provision of that evidence.

2.14. It is recommended that build elements are progressively verified by the PC at appropriate points during the construction and inspection processes as set out in the Construction CP to facilitate the Gateway 3 process. For example, it would be appropriate to have proved compliance on foundations at the time of inspection and filed inspection evidence for submission for Gateway 3. This will ensure that the compliance checks carried out at completion focus on elements that are delivered later on in the construction phase. The project team should ensure they capture the evidence of progressive assurance as this will form their Golden Thread of building information. During inspections BSR may comment on the quality of that evidence.

3. CONSTRUCTION PHASE

Start of Work

3.1. In accordance with Regulation 9(2) of the **Building (Higher-Risk Building Procedures) (England) Regulations 2023**, the Client has the responsibility to give notice to the BSR at least 5 working days in advance of the date on which they intend to start the HRB work or stage of HRB work.

3.2. In accordance with Regulation 9(3) of **t**he **Building (Higher-Risk Building Procedures) (England) Regulations 2023**, the Client has the responsibility to give notice to the BSR at least 5 working days after the work is deemed to have commenced in accordance with Regulation 46A of the **Building Regulations 2010**.

3.3 Both notices are submitted via the BSR **online portal**.

Inspections

3.4 As referred to in para 2.7 the BSR is responsible for compiling a schedule of inspections to be carried out through the construction phase. Each inspection will have a clear focus agreed by the MDT. This is BSR's inspection schedule. BSR will share with the applicant a part of this schedule covering those inspections where BSR believes notifying the applicant will add value to the regulatory function. BSR retains the right to carry out inspections not previously notified to the applicant.

3.5 At the end of each inspection the person carrying out the inspection, normally an RBI, should feedback a summary of the matters they will report back to BSR and, in particular, bring to the attention of the site any matters where they believe BSR should be considering further action. They will then provide an inspection report to BSR, liaise with the Regulatory Lead and any other appropriate members of the MDT. After each inspection has been concluded BSR will feedback to the project.

3.6 The PC should review each report issued for accuracy and should raise with the BSR any matters of concern or challenges to the contents of the report.

Monitoring and gathering evidence

3.7. The **Golden Thread** is a process and an approach to good information management. It is intended to deliver accurate information about the building to support dutyholders and Accountable Persons in complying with the Building Regulations 2010 in design and construction and managing building safety risks in occupation, especially in relation to fire spread and structure.

3.8. The Client must make sure that monitoring and evidence gathering arrangements exist and are implemented, and that all other dutyholders coordinate information relevant to their work and the work of others.

3.9. The PC has direct responsibility for recording and cataloguing all evidence required to prove that the building has been built in accordance with the Agreed Documents. This includes the design and plans approved at Gateway 2 and all changes as processed under the Change CP.

3.10. The Construction CP outlines the procedures, processes, and measures to be implemented post approval and in the construction phase of project to ensure compliance with Buildings Regulations etc. The Construction CP approved at Gateway 2 will:

- State the responsibilities of the Principal Designer (PD) and PC;
- Set out the scope, content and format of the information to be provided as part of the Completion Certificate application; and

- Describe the process for monitoring, gathering, recording and evidencing the information post approval and in the construction phases.

3.11. Any departure from or change to the Construction CP should be processed in accordance with the agreed Change CP. As a minimum the changes would be a **recordable change**, but if they have deviated from the contents of the Agreed Documents, approved design, or altered any compliance risk, they would be a **notifiable** or **major change**.

3.12. The information provided as part of the Completion Certificate application (Gateway 3) should include quality and compliance control records evidencing the standard of the installed work. Records should be sufficient to evidence compliance with each approved element of the design and works. The BSR should take a proportionate approach and may not examine every record and only review samples of evidence to test whether the systems for demonstrating compliance are robust. It is therefore imperative that the quality and clarity of the evidence is sufficient to give confidence to the BSR that the works are compliant with the Building Regulations 2010.

3.13. If concerns arise from the sample review, the BSR may require further information or that work be opened up for visual inspection. This must be complied with. It is therefore advised that the evidence that is presented as part of the Completion Certificate application (to demonstrate how compliance has been achieved with the relevant requirements of the Building Regulations 2010), is supported by a commentary document, explaining the process followed. An example summary statement for works or types of work could include:

- Quality Assurance records including details on installation, system, location, installer and appropriate records etc.;
- The percentage sampling of information provided for the Completion Certificate application;
- The additional information that is available if required by the BSR; and
- Confirmation that this information has formed part of the Regulation 38 handover to the client.

3.14. It is important to note that every project will be individually assessed and the level of review from the BSR may vary to reflect project specific requirements.

3.15. It is recommended that the Client and PC should conduct early coordination meetings with the **Relevant Person**, so that information, systems and formats used during construction can be discussed and agreed to support the transition into the occupation phase, where the Relevant Person will take on responsibility for ongoing building safety.

Evidence types

3.16. Evidence relates to all records which prove that the building has been built in accordance with the Gateway 2 Agreed Documents incorporating processed changes, and in compliance with the Building Regulations 2010.

3.17. Evidence should be captured as the building is constructed. The evidence can take the form of photographs, Quality Assurance (QA) records described within the Construction CP, as built information (including drawings and plans, schematics and other information), test certificates etc., but it should all be relevant to proving compliance with the Building Regulations 2010.

3.18. The Construction CP should provide the process of how relevant evidence will be provided from contractor dutyholders and product manufacturers. (The next section provides additional guidance for PCs and contractors in relation to product manufacturers).

3.19. All evidence should be effectively collated and stored in a centralised system, so it is readily available to anyone who may need to access the information (including the BSR) in accordance with the requirements for providing and maintaining the Golden Thread of information for the project. Information should be: Accessible, Accountable, Accurate, Electronic, Secure, Transferable, Understandable and Up to date. The Golden Thread requirements are set out in Regulation 31 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**.

Evidence from Product Manufacturers

3.20. Manufacturers of safety-critical products play a key role in trying to ensure that their products are installed correctly and perform as intended. To support safe outcomes on construction projects, product manufacturers may provide both technical support and site support to the supply chain.

3.21. The following information identifies good practice for a PC working collaboratively with manufacturers and may assist in the provision of evidence to support a Completion Certificate application. It is advised that:

Site inspections and reporting

- If required, manufacturers should attend construction sites to observe the installation of their products. (This requirement should be made clear in the procurement process).

- Following each visit, a written inspection report should be produced, clearly stating whether the installation complies with the manufacturer's recommendations, guidance and published literature.

- The frequency of inspections should be agreed with the PC and incorporated into the project's assurance process and included in the BSR Inspection Schedule.

Training and competency of installers

- It may be appropriate for manufacturers to deliver third-party, certified, product installation training to installation teams prior to the commencement of works.
- Training could be provided onsite in the form of a toolbox talk or at another suitable location.
- PCs should include the requirement for such training within their QA processes.

Supporting installer self-inspection

- Where required, manufacturers should provide tools, checklists, and/or digital means that enable installers to undertake their own inspections of safety-critical products.
- Manufacturers should review inspection reports prepared by installers to confirm that this evidence demonstrates compliance with their recommendations.
- The supervision arrangements for works should be defined by the PC in the Construction CP. However, it is recommended that sufficient evidence is captured by the installer to demonstrate compliance for every part of the works.
- Manufacturers should issue clear prompts to installers on what to check. For example, in the case of open state cavity barriers (OSCBs), installers should confirm:
    - Mechanical retention of the OSCB;
    - Air gap dimensions are correct;
    - Butt joints are tightly abutted;
    - Correct brackets have been used;
    - Brackets are spaced at the correct centres;
    - Barriers are installed in the correct location and correct orientation;
    - Vertical barriers take precedence over horizontal OSCBs; and
    - Any additional product-specific requirements.

Recommended good practice in relation to product manufacturers

- It is advisable, that where applicable, that clients should require manufacturers of safety-critical products to:
    - Hold **Code for Construction Product Information (CCPI)** certification to demonstrate that product information is clear, accurate, accessible, current, and unambiguous for both construction and occupation purposes.
    - Maintain a competency framework for staff members who provide product information and inspections to ensure advice is reliable and consistent.
    - Obtain third-party certification for products, underpinned by appropriate test evidence to current standards and regulations as required by BSR guidance.
    - Operate a documented escalation process, including a mechanism to notify PCs of any Mandatory Occurrence Reports (MORs).
    - Keep accurate records of all product information provided for each project, including the name of the individual who issued the information and the name of the individual in receipt of the information.

Management of Change

3.22. Through the construction phase, it is entirely conceivable that the design and information approved within the Agreed Documents at Gateway 2 become subject to change. To make any change, the PC must implement the **Change CP** approved at Gateway 2.

3.23. The Change CP describes the procedures for recording and managing changes. The definitions of a change (**recordable, notifiable, or major**) are set out in regulations 18-26 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023**. However, how each proposed change is assessed and processed, and what classification the change should be, should be set out in the Change CP.

3.24. Whilst the Client holds the legal responsibility for ensuring the right change control procedure is followed, it is the duty of the PD and PC to identify and categorise proposed changes during the building work and to advise the Client.

3.25. Independent expert advice should be sought to help with categorisation of changes if required. The Change Control process should be considered an opportunity to provide a well-considered and structured Completion Certificate application. It can reinforce elements of the design that have developed during the construction phase. The records kept and evidence submitted will help demonstrate how the

design evolved through construction and how compliance with the Building Regulations 2010 was maintained.

Mandatory Occurrence Reporting

3.26. Through the construction process, dutyholders for the project must implement the requirements for **Mandatory Occurrence Reporting** (MOR) approved at Gateway 2 in accordance with the **MOR Plan**.

3.27. The MOR plan is used to demonstrate proactive risk management. It captures and requires a response to safety-critical incidents which may impact compliance with structural integrity or fire safety of a HRB during design and/or construction which if not corrected, would be likely to present a risk of a significant number of deaths or serious injury, to a significant number of people.

3.28. The Completion Certificate application should include a log of all activity as required by the MOR plan. It is the dutyholders responsibility (Client, PD and PC) to advise the BSR of any relevant matter brought to their attention under the agreed MOR plan during the construction phase by the quickest practicable means without undue delay and ensure the details of these matters are provided in the MOR plan submitted as part of the Completion Certificate application.

3.29. Build UK guidance is also available in relation to **Mandatory Occurrence Reporting During Construction**.

4. COMPLETION PHASE

Gathering and Sharing Information

4.1. As the project progresses through the construction phase, the Client (most likely via the PD and PC dutyholders) should prepare key documentation for two purposes:

- To enable the handing over of information to those who will be responsible for the management of the building during occupation (as detailed in Regulation 38 of the **Building (Higher-Risk Buildings Procedures) (England) Regulations 2023** to manage building safety risks; and
- To support the Completion Certificate Application as required in **Regulation 40** of those same regulations.

4.2. The Regulation 38 information needs to include:

- The BFLO information; and
- The specified Golden Thread information.

4.3. The BFLO information is information relating to the topics covered by parts B, F, L and O of the Building Regulations 2010 - fire safety, means of ventilation, conservation of fuel and power, and power and mitigation of overheating. With regard to Part L information this should include details of any on site electricity generation. For new build HRBs the BFLO information will be provided as part of the Golden Thread information.

4.4. The Golden Thread information includes:

- If applicable, a copy of the partial Completion Certificate application which the client proposes to make, and each document which is required under the partial completion certificate requirements; and
- The Completion Certificate application required documents.

4.5. Before the submission of a Completion Certificate application, and no later than the date when the work is complete, the Client must provide this Regulation 38 information to the **Relevant Person** responsible for the building. The Relevant Person must provide confirmation of receipt and that they understand the information.

4.6. The information should be presented in an easy-to-understand way and explain what the design has delivered and what that means for the dutyholders in the occupation phase in regard to operation, testing and maintenance requirements.

Building Completion Application (Gateway 3)

4.7. The documents required to be submitted to the BSR to accompany the Completion Certificate application include:

- **The as built information** - This is the final issue information, and it should be an accurate reflection of what has been built (including as built drawings, plans, schematics, and other information);
- **Change Control Log** - If there have been departures from the original design, they should have been recorded in the log;
- **Building Regulations Compliance Statement** – confirming the building meets all relevant regulations;
- **Fire and Emergency File and Fire Statement** – detailing fire safety systems and means of operation, evacuation routes, and materials used;
- **Construction CP** – outlining how construction was managed to ensure safety and quality;
- **A Compliance Declaration** - The Client must provide a Compliance Declaration, confirming that all dutyholders have fulfilled their duties and that the building work complies with the Building Regulations 2010. The PD and PC are required to provide the necessary information and assurances to support the client's declaration.
- **A MOR Plan** – The Client should provide a MOR plan which should confirm the system that was used in the design and construction phases to administer mandatory occurrence reporting and advise the BSR of any relevant matter brought to their attention under the agreed MOR plan during the construction phase (see section 3 above).

4.8. **Annex D** provides an example **Schedule of Information** for a Completion Certificate application. It can be used to structure the information required for a building control application before the latter is uploaded to the BSR platform. The Schedule is a baseline list of information that should be considered, used and amended to reflect project specific requirements.

4.9. **CLC Guidance Note 04** recommends the use and submission of an Application Information Schedule for a Building Control Approval application (Gateway 2). The schedule lists the baseline design information that should be provided in an application. The reference numbers (where relevant) are repeated in **Annex D** Schedule of Information.

4.10. Further guidance by **Build UK on applying for a Building Control Completion application (Gateway 3)** is available.

Process after submission of a Completion Certificate application (Gateway 3)

4.11. Following the submission of a Completion Certificate application, if the BSR is satisfied that:

- the HRB work is completed and complies with all applicable requirements of the Building Regulations 2010;
- all applicable documents and information are submitted as part of the Completion Certificate application; and
- all handover information has been passed onto the Relevant Person and that the Relevant Person have confirmed they are able to access the information and that the information is sufficient to enable them to understand, operate and maintain the building.

then, a **Completion Certificate** must be issued.

4.12. If any one of the above items are not satisfied, then the application will be rejected.

4.13. The applicant should note that the BSR should determine the application within an 8-week period, which includes for consultation and a final inspection, but this may be extended by agreement between the applicant and the BSR.

End of Note 09

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This guidance suite has been provided in memory of Lindsay McGibbon who worked tirelessly to improve building safety in the construction industry and contributed to the early development of the guidance.

If you have any comments or feedback on this guidance note, please e-mail the **Construction Leadership Council**

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