

# **Building Warrant Fees**

## **SNIPEF Summary**

### **Purpose of consultation**

This consultation seeks to obtain the views on proposed increases to the building warrant fees that are required to strengthen the building standards system and the development of a new building warrant fees model in Scotland.

The consultation covers five main areas:

1. Overview of building warrant fees
2. Building warrants fees for High-Risk Buildings (HRBs)
3. Local authority building standards enforcement
4. Devolved building warrant fees
5. Impact assessments

The proposed changes aim to:

1. Increase building warrant fee income to support, enhance, and improve the system.
2. Implement an annual fee increase for an initial period of three years.
3. Introduce a flexible building warrant fees model for future use.

### **Consultation background**

Following the Grenfell Tower fire in 2017, a Ministerial Working Group (MWG) in Scotland established two Review Panels focussing on Fire Safety and Compliance and Enforcement. The panels identified a need to strengthen the building standards system without overhauling its core elements. They suggested creating a 'national or central hub' to provide expertise for the design of complex buildings.

Consequently, the Building Standards Futures Board was established in 2019 to guide the implementation of the Review Panels' recommendations, focussing on seven work streams, including Workforce Strategy, Compliance Plan Approach, and Digital Transformation. The board is currently shaping several changes, such as introducing a Compliance Plan Manager role, pre-application assessments, and a Building Warrant Compliance Plan.

This consultation seeks opinions on increasing building warrant fees to support the strengthened building standards system, including the Building Standards Hub, enhanced Scottish Government Building Standards Division (**BSD**) monitoring and auditing, and whether these fees should fund local authority Building Standards enforcement. Additionally, views are sought on whether fees should be set nationally or devolved.

## Building Warrant Fees Consultation

**Issued:** July 2023

**Closing:** 24 October 2023

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### Consultation Summary

The following is a summary of the entire Scottish Government consultation document. It should be used only as a reference guide. The **Page Ref** column indicates where the full commentary can be found in the [Building Warrant Fees consultation document](#).

Pt.	Commentary	Page Ref
<b>Part One: Building Warrant Fees Consultation</b>		<b>5-12</b>
1	<p><b>Overview of the Existing Building Standards Fees Model</b></p> <p>The building standards system in Scotland, established under the Building (Scotland) Act 2003 and introduced in 2005, mandates obtaining a building warrant before beginning any construction work.</p> <p>The building warrant must be assessed by an appointed verifier against the Mandatory Functional Standards. Scottish Ministers appoint these verifiers, with the 32 local Scottish authorities acting as verifiers for their respective regions. They ensure that building warrant applications align with public interests, checking designs pre-construction and assessing completed works before occupancy. The Scottish Ministers also have the authority to set regulations and procedures, including fee structures.</p> <p>Fees for building warrants are determined based on the project's 'value of work'. These fees finance the verification process and are meant to cover its costs. Local authorities decide how to utilise the fee income, adhering to the Scottish Government's Building Standards Frameworks for Verifiers. Authorities must also budget to cover verification staffing costs and an additional 30% for other verification-related expenses.</p>	5
2	<p><b>The Current Building Warrant Fee Scale</b></p> <p>In July 2017, Scotland updated its building standards fees, which had remained unchanged since 2005, to cover verification costs fully. The fee for projects valued up to £5,000 is set at £150. Beyond this, fees increase in increments based on the project's value, with a cap of £253 for every</p>	5

	<p>additional £100,000 over £1 million. Special discounts are available for projects that come with approved certifications of design or construction, showcasing compliance with building standards. The Building (Miscellaneous Amendments) (Scotland) Regulations 2017 details the breakdown of the fee structure.</p>	
<p><b>3</b></p>	<p><b>Changes to the Building Standards System: Futures Board Work Streams</b></p> <p>The building standards system in Scotland is undergoing development to strengthen its structure, with potential changes increasing resource requirements for verifiers in terms of cost and time.</p> <p><u>Compliance Plan Approach</u></p> <p>A new 'Compliance Plan' approach and a Compliance Plan Manager (CPM) role are being introduced to ensure buildings comply with approved plans and regulations. This change aims to enhance the current system, making it mandatory for certain notifications and shifting the responsibility of creating a compliance plan from verifiers to the CPM, designer, and contractor.</p> <p><u>Verification Delivery Model</u></p> <p>A central building standards support hub is under consideration in conjunction with regional working. A pilot for the Building Standards Hub is ongoing, and its primary functions include supporting the 32 local authority verifiers and enhancing building standard services. The hub's annual cost is estimated at £1 million and is expected to be funded by building warrant fees.</p> <p><u>Digital Transformation</u></p> <p>Efforts are in place to digitally transform the building standards system. This includes harnessing technology to optimise the system's efficiency and collaborating on a six-year Scottish Government Digital Planning Programme. Initiatives like Remote Verification Inspection guidance are being produced.</p> <p><u>Workforce Strategy</u></p> <p>The strategy focuses on four pillars:</p> <ol style="list-style-type: none"> <li>1. sustainable workforce,</li> <li>2. skilled workforce,</li> <li>3. professional framework, and</li> <li>4. inclusivity.</li> </ol> <p>Initiatives like a Competency Framework, Modern Apprentice pathway, and Ambassador Network are being implemented. An online training platform is also in development to address skill gaps.</p>	<p><b>6-8</b></p>

<p>4</p>	<p><b>Research Findings - Building Warrant Fees</b></p> <p>BSD commissioned research into the building standards fees system, divided into two parts.</p> <p><u>Fees Research Part 1</u></p> <p>This part reviewed the income and expenditure of each local authority verifier and the level of reinvestment in service delivery. It revealed that after the fee increase in 2017, the majority (58%) felt the current fees still needed to be increased. There were concerns about increased workloads, compliance checks, the sufficiency of fees to meet various frameworks, and customers' heightened expectations.</p> <p><u>Fees Research Part 2</u></p> <p>This section provided a flexible building standards fee model valid for three years, considering factors like inflation and future changes to the building standards system. The model proposes legislated changes to fees annually over three years, with adjustments based on research, reporting, and auditing. The research identified various limitations of the current fee structure, with one key issue being the loss of real value of fixed fee elements since 2017. Additionally, it was revealed that not all income from building warrant fees is directed to local authority verifiers.</p> <p><u>Public Consultation</u></p> <p>The consultation proposes an increase in fees, annual inflation uplifts, and a new fee calculation model flexible for future adjustments within three years based on ongoing research and evidence.</p>	<p>8-10</p>
<p>Q1.1</p>	<p><b>Do you agree building warrant fees should be increased to strengthen the building standards system in Scotland?</b></p> <p>(Strongly agree, <b>agree</b>, neither agree or disagree, disagree, strongly disagree)</p> <p>Give reasoning for your answer:</p> <p>The Grenfell Tower fire highlighted the need for robust and comprehensive building standards. With the Building Standards Futures Board's ongoing efforts, including the Compliance Plan Approach, Verification Delivery Model, Digital Transformation, and Workforce Strategy, Scotland's landscape of building standards is evolving towards a safer and more efficient system. These changes demand additional resources, both in terms of manpower and technology, to ensure its effective implementation.</p> <p>The 2017 fee increase, while a step in the right direction, is insufficient in covering rising verification costs and associated building standard initiatives. The BSD-commissioned research echoes this sentiment, with 58% feeling</p>	<p>10</p>

	<p>that the fees still need to be raised, underscoring the gap between the current fee structure and the actual cost of ensuring public safety and compliance.</p> <p>Furthermore, as building projects become increasingly complex and the standards rigorous, the workload of verifiers will naturally expand. Establishing roles like the Compliance Plan Manager and innovations like the Building Standards Hub will entail further financial investment. Ensuring these essential initiatives are adequately funded is paramount, lest they become tokens without substance.</p> <p>Considering these reasons and their responsibility to uphold the highest safety and quality standards in the construction sector and plumbing and heating profession, SNIPEF endorses a fee increase. However, we also emphasise that this increase should be accompanied by transparency in allocation, ensuring all additional funds directly benefit and enhance the building standards system.</p>	
<p><b>Q1.2</b></p>	<p><b>Do you agree that a proportion of the building warrant fee should be used to support a central Building Standards Hub?</b></p> <p>(<b>Strongly agree</b>, agree, neither agree or disagree, disagree, strongly disagree)</p> <p>Give reasoning for your answer</p> <p>We strongly agree that a proportion of the building warrant fee should be used to support a central Building Standards Hub.</p> <p>Establishing a central Building Standards Hub addresses a pivotal recommendation from the post-Grenfell Tower fire reviews. Such a hub promises to streamline and centralise expertise, guidance, and resources, thus facilitating consistent and high-quality building standards across Scotland. With 32 local authority verifiers, a central hub can act as a hub for best practices, research, and continual upskilling.</p> <p>Moreover, by being a consolidated body, a Building Standards Hub can efficiently address challenges, harness technological advancements, and provide timely responses to evolving building requirements. Given the complexities and rapid advances in construction methods, materials, and technologies, the industry benefits from having a focal point to turn to for advice, training, and direction.</p> <p>Investing a proportion of the building warrant fee into this hub ensures its sustainability and viability. It provides financial support for the hub's operations and reinforces the importance and value of a standardised, coordinated approach to building safety and quality.</p>	<p><b>11</b></p>

	<p>Finally, from our perspective as plumbing employers, we believe that a central Building Standards Hub would lead to clearer guidelines, better resource accessibility, and consistent training, thus ensuring safer and more efficient plumbing installations across Scotland.</p>	
<p><b>Q1.3</b></p>	<p><b>Do you support the introduction of enhanced verification and certification auditing, monitoring and reporting of fee investment to support the implementation of the strengthened building standards system over the next three years?</b></p> <p>(Yes, Not sure, No)</p> <p>Give reasoning for your answer</p> <p>Response on behalf of SNIPEF (The Scottish &amp; Northern Ireland Plumbing Employers' Federation):</p> <p>Yes, SNIPEF supports introducing enhanced verification and certification auditing, monitoring, and reporting of fee investment to support the strengthened building standards system over the next three years, with specific consideration for contractors under the Approved Certifier of Construction Scheme (ACCS). Our reasons include:</p> <ol style="list-style-type: none"> <li>1. <b>Transparency and accountability:</b> Enhanced verification and certification auditing will increase transparency. As operators of the ACCS, it's paramount for us to ensure that fees are used judiciously. Ensuring these funds are transparently invested and yield measurable outcomes will instil trust among industry stakeholders and the public.</li> <li>2. <b>Quality assurance with consideration for ACCS:</b> While a robust verification and certification process is essential for overall adherence to building standards, it's worth noting that contractors under ACCS have an inherent layer of quality assurance. These contractors are already subjected to a rigorous certification and standards maintenance process through ACCS and SNIPEF. Therefore, while generally enhanced verification is supported, contractors under ACCS might require less detailed audits due to this existing framework.</li> <li>3. <b>Future-proofing:</b> The construction sector is experiencing rapid changes. By championing a rigorous verification process over the next three years, we're laying the groundwork for the future, ensuring the building standards system remains agile and responsive.</li> <li>4. <b>Efficiency and streamlining:</b> Given that our ACCS already incorporates stringent checks and balances, it would be more efficient to consider a streamlined approach for ACCS contractors. This would</li> </ol>	<p><b>11</b></p>



	reduce redundancy and ensure that resources are allocated where they are most needed.	
Q1.4	<p><b>Do you agree that, before any planned increases or adjustments to building warrant fees in the second and third year, progress should be reviewed against suitable criteria towards the planned outcomes?</b></p> <p>(Yes, Not sure, No)</p> <p>Give reasoning for your answer</p> <p>Yes, SNIPEF wholeheartedly agrees that, before implementing any planned increases or adjustments to building warrant fees in the second and third year, progress should be reviewed against suitable criteria towards the planned outcomes.</p> <p>Our reasons are:</p> <ol style="list-style-type: none"> <li><b>Evidence-based adjustments:</b> An assessment based on well-defined criteria provides empirical evidence. This ensures that fee adjustments are made based on tangible progress and results rather than mere speculation. A systematic review based on set criteria will determine if the goals of the previous increments were achieved and if further increases are justifiable.</li> <li><b>Accountability and transparency:</b> Regular reviews promote accountability and transparency. Stakeholders, including those in the construction sector and plumbing and heating profession, need assurance that financial contributions lead to the desired improvements in the building standards system. By reviewing progress, the industry can ensure that funds are allocated efficiently and that the intended initiatives are progressing as envisioned.</li> <li><b>Flexibility and responsiveness:</b> The construction landscape is dynamic, with frequent technological advancements and regulatory shifts. Committing to reviews ensures that the building standards system remains adaptive to these changes, enabling course corrections if the established goals aren't being met.</li> <li><b>Building trust:</b> Regular checks and balances, significantly when they impact financial aspects, are fundamental to building trust among industry participants and the public. Demonstrating a commitment to assessing fee adjustments' efficacy can foster confidence in the system's integrity.</li> </ol>	12
	<b>Part Two: High Risk Buildings (HRBs)</b>	<b>13-14</b>
<b>5</b>	A new Compliance Process is being established for High-Risk Buildings (HRBs) involving a Building Warrant Compliance Plan, a Compliance Plan	<b>13</b>



	<p>Manager (CPM) role, and a pre-application assessment process. This approach will eventually be adapted for all building warrant applications.</p> <p>HRBs encompass buildings over 11 meters, educational establishments, hospitals, local authority-controlled facilities, and residential care buildings. The CPM role, crucial for this process, is under trial and is expected to be legislated by 2025/26.</p> <p>Current research indicates that the existing fee model needs to be revised for the anticipated demands of the building standards verification service, especially concerning HRBs.</p> <p>The proposed HRBs have more stringent requirements, demanding higher verifier involvement and costs, such as pre-application meetings, routine engagements, monitoring, inspections, and warrant approvals. Hence, an enhanced separate fee for HRB warrant applications is proposed to account for these additional verifier costs.</p>	
<p><b>Q2.1</b></p>	<p><b>Do you support the introduction of an enhanced fee for High Risk Building warrant applications?</b></p> <p>(<b>Strongly agree</b>, agree, neither agree or disagree, disagree, strongly disagree)</p> <p>Give reasoning for your answer</p> <ol style="list-style-type: none"> <li><b>Reflecting the complexity:</b> HRBs, by definition, cater to sensitive populations or functions – schools, hospitals, tall residential structures, and more. Introducing new compliance processes, roles like the Compliance Plan Manager, and pre-application assessments for these buildings speaks to their heightened risk and complexity. An enhanced fee reflects the additional oversight and expertise required for these critical projects.</li> <li><b>Safety first:</b> The Grenfell Tower fire underscores the profound importance of stringent standards for HRBs. Given the potential risks associated with such buildings, every measure, tool, and resource must be utilised to ensure utmost safety. If a higher fee can bolster the verification process and provide a safer built environment, it's a small price.</li> <li><b>Additional verification steps:</b> As mentioned, HRB applications are expected to require more extensive verifier involvement – from pre-application meetings to frequent inspections. This adds layers of time, expertise, and administrative efforts that must be financially accounted for. An enhanced fee is fair and necessary to ensure that the rigorous standards set for HRBs are maintained throughout the construction process.</li> </ol>	<p><b>14</b></p>

	<p>4. <b>Resource allocation:</b> The introduction of roles like the CPM and a dedicated compliance plan indicates the necessity of specialised resources for HRBs. These roles and processes will undoubtedly involve costs – be it for training, salaries, or technology. Charging an enhanced fee will support allocating these specialised resources where they’re most needed.</p> <p>5. <b>Precedence and consistency:</b> It’s noted that the compliance process for HRBs will eventually be adapted for all building warrant applications. By introducing an enhanced fee model now, we establish a precedent and framework for consistent and transparent fee adjustments in the future based on the nature and risk associated with buildings.</p>	
<b>Part Three: Building Standards Enforcement</b>		<b>15-16</b>
<b>6</b>	<p>Building standards staff handle the statutory elements of building standards, such as enforcement, and broader local authority tasks, like licensing and safety at sports venues.</p> <p>While fees aren't currently charged for statutory obligations like enforcement and maintaining the building standards register, most local authority verifier teams use building warrant fee income to fund these roles. The Enforcement and Compliance Review Panel suggests that local authorities need to be more willing to penalise serious or repeated non-compliance within the building warrant process.</p> <p>To ensure consistent and improved enforcement in the building standards system, feedback is being sought on formally using the building warrant fee to fund statutory enforcement. This will guide policy formulation and resource allocation decisions for building standards enforcement.</p>	<b>15</b>
<b>Q3.1</b>	<p><b>Should a portion of building warrant fees be used to fund the local authority compliance enforcement role but only as it relates to the building warrant process?</b> (Yes, No Unsure)</p> <p>Give reasoning for your answer</p> <p><b>SNIPEF’s reasons are:</b></p> <p>1. <b>Integrated Process:</b> Enforcement is a critical component of the building warrant process. It ensures that the standards, designs, and plans approved during the warrant application phase are adhered to during construction. Thus, the two functions are inherently linked, and it's logical to use the fees collected for one part of the process to support the other.</p>	<b>15</b>

	<p>2. <b>Ensuring compliance and safety is paramount</b>, especially in construction and infrastructure. By directly allocating a part of the warrant fees to enforcement, we ensure that the structures being built adhere to the highest standards, reducing potential risks and hazards in the long run.</p> <p>3. <b>Resource allocation and specialisation:</b> Enforcement requires dedicated personnel with expertise. By allocating funds specifically to this purpose, local authorities can invest in training and other resources to ensure their enforcement teams are well-equipped to handle the complexities of the building warrant process.</p> <p>4. <b>Deterrence against non-compliance:</b> The Enforcement and Compliance Review Panel's recommendation to penalise severe or repeated non-compliance highlights the importance of a well-funded enforcement mechanism. Having dedicated funds for this purpose sends a clear message about the importance of compliance and the readiness to act against any deviations.</p>	
<p><b>Q3.2</b></p>	<p><b>Should a portion of building warrant fees be used to fund the local authority building standard's wider statutory role covering both building warrant compliance enforcement and dangerous and defective buildings?</b></p> <p>(Yes, No, Unsure)</p> <p>Give reasoning for your answer</p> <p>SNIPEF believes that some building warrant fees should fund the local authority building standard's broader statutory role, encompassing building warrant compliance enforcement and addressing dangerous and defective buildings.</p> <p>Our reasons are:</p> <ol style="list-style-type: none"> <li>1. <b>Shared goal of safety:</b> Both building warrant compliance enforcement and rectifying dangerous and defective buildings serve the same fundamental purpose: ensuring public safety. It's coherent and efficient to allocate resources from a single pool to achieve this unified objective.</li> <li>2. <b>Proactive and reactive measures:</b> While building warrant compliance is a proactive measure to ensure safety and standards from the start, addressing dangerous and defective buildings is reactive, rectifying problems after they've arisen. Both are essential components of a robust building standards system, and it's appropriate that they share funding resources.</li> </ol>	<p>16</p>

	<p>3. <b>Cost efficiency and resource allocation:</b> Dangerous and defective buildings can pose significant risks to the public. Addressing these issues might sometimes be cost-intensive. Drawing from the building warrant fees ensures local authorities have the necessary funds to handle such situations promptly and efficiently.</p> <p>4. <b>Deterrence:</b> Allocating funds for the rectification of dangerous and defective buildings also acts as a deterrent for builders and developers. It sends a clear message about the seriousness with which authorities approach building standards, ensuring better initial compliance.</p>	
<b>Part Four: Devolved Building Warrant Fees</b>		<b>17-18</b>
<b>7</b>	<p>BSD evaluated the pros and cons of localising building standards fees in the broader context of the Scottish Government's New Deal initiative with Local Government.</p> <p>Currently, the Scottish Government centrally sets these fees, ensuring uniform and predictable costs throughout the nation. The research assessed the fee system in England and Wales, where each local authority or approved inspector determines fees.</p>	<b>17</b>
<b>8</b>	<p>Three principal alternatives were considered:</p> <ol style="list-style-type: none"> <li>1. Full-fee devolution</li> <li>2. Partial devolution with national guidance</li> <li>3. Partial devolution with deviations from a national structure.</li> </ol>	<b>17</b>
<b>9</b>	<p>The report found:</p> <ol style="list-style-type: none"> <li>1. Introducing a devolved system for building standards fees in Scotland faces no inherent challenges. England and Wales have employed such a system for years, with issues stemming from competition, not devolution.</li> <li>2. This research didn't delve into the potential competition in Scotland's building warrant.</li> <li>3. The Scottish Government would need to define boundaries for local authorities to set fees while ensuring cost recovery.</li> <li>4. There must also be governmental oversight to ensure fee levels align with service costs.</li> <li>5. Devolving fees could complicate the funding of central services like the Hub, although it could be based on warrants or fee income.</li> </ol>	<b>17</b>

	6. While a devolved system could cause mild inconsistencies in fee structures across Scotland, this has yet to pose significant issues in England and Wales.	
Q4.1	<p><b>Should building warrant fees be set at national or local level?</b>  <b>(National Level, Local Level, Unsure)</b>          Give reasoning for your answer</p> <ol style="list-style-type: none"> <li><b>Consistency and predictability:</b> While the devolved system in England and Wales hasn't led to significant disruptions, Scotland's unique building landscape, with its mixture of urban and rural areas, would benefit from uniformity in fee structures. Having nationally set fees ensures businesses, especially those operating across multiple localities, can anticipate costs without navigating a mosaic of fee structures.</li> <li><b>Central services funding:</b> Centralised services like the Hub would be easier to fund with nationally set fees. A nationally uniform fee would simplify the budgetary allocations and ensure consistent support for such centralised services that aim to benefit all regions uniformly.</li> <li><b>Quality and standards:</b> A nationally set fee structure can ensure consistent service quality across all regions. This prevents regions from potentially undercutting fees at the expense of the quality of service.</li> <li><b>Avoidance of unintended competition:</b> While the current research did not explore potential competition in Scotland's building warrant due to devolved fees, there's a potential risk of regions competing by altering their fee structures. This could drive down fees in certain areas and potentially drive down the quality of services, as seen in some instances in England and Wales.</li> </ol>	16
<b>Part Five: Impact Assessments</b>		<b>19-22</b>
10	<p><b>Equality</b></p> <p>The Scottish Government anticipates no adverse impacts from the consultation's proposals on individuals with protected characteristics. Feedback on effects regarding age, disability, gender, race, religion, and other protected categories will inform the final Equality Impact Assessment for potential changes to building standards fee legislation.</p>	19
Q5.1	<b>Are there any proposals in this consultation which you consider impact or have implications on people with protected characteristics?</b>	19

	<p>(Yes, No, Unsure)</p> <p>Give reasoning for your answer</p> <p>The consultation focusses primarily on the structural and administrative aspects of the building standards system, including the funding and allocation of fees. The presented information shows that the proposals are not inherently discriminatory or seem to impact any group over another disproportionately.</p>	
<b>11</b>	<p><b>Business and Regulatory</b></p> <p>To help us determine the impact of the policies proposed in the consultation, we are interested in finding out if these proposals would lead to increased costs and/or impact on resources for you or your business (if applicable).</p>	<b>20</b>
<b>Q5.2</b>	<p><b>Do you think any of the proposals in this consultation have any financial, regulatory or resource implications for you and/or your business (if applicable)?</b></p> <p>(Yes, No, Unsure)</p> <p>Give reasoning for your answer</p> <p>The proposals, particularly the introduction of enhanced fees for High-Risk Building warrant applications and the potential changes in fee structure could have financial implications for our members. Any fee increase, directly or indirectly, could lead to increased project costs, which may be either passed onto clients or absorbed by our member businesses, affecting their profitability. Additionally, introducing the Compliance Plan Manager (CPM) role and more rigorous compliance mechanisms might require additional administrative resources and time, leading to potential delays and increased overheads in project delivery.</p>	<b>20</b>
<b>12</b>	<p><b>Island Communities</b></p> <p>To help us determine the impact of the policies proposed in the consultation, we are interested in finding out if these proposals would lead to an increased impact on island communities.</p>	<b>21</b>
<b>Q5.3</b>	<p><b>Do you think that any of the proposals in this consultation have any impact or implications on island communities?</b></p> <p>(Yes, No, Unsure)</p> <p>Give reasoning for your answer</p> <p>Island communities often face unique challenges compared to mainland regions, especially regarding logistics, resource availability, and infrastructure. Several proposals, like introducing enhanced fees for High-Risk Building warrant applications or the potential centralisation aspects,</p>	<b>21</b>



	<p>could disproportionately affect island communities. For instance, transporting materials and specialists required for compliance might incur additional costs for island projects. Additionally, if the Building Standards Hub or other centralised resources are not easily accessible or tailored to address the distinct needs of island projects, it could lead to delays and increased expenses. These factors could impact the viability of construction projects in such regions.</p>	
13	<p><b>Fairer Scotland Duty</b></p> <p>To help us determine the impact of the policies proposed in the consultation, we are interested in finding out what more can be done to reduce the 'inequalities of outcome' caused by 'socio-economic disadvantage' and if these proposals would lead to an increased impact on inequalities of outcome.</p>	22
Q5.4	<p><b>Do you think any of the proposals in this consultation have any impact on the inequalities of outcome caused by socio-economic disadvantage?</b></p> <p>(Yes, No, Unsure)</p> <p>Give reasoning for your answer</p> <p>While the intentions behind the proposals are noble and aim to enhance building safety and standards, there is potential for unintended consequences concerning socio-economic disadvantage. Increases in building warrant fees, especially for High-Risk Building applications, might inadvertently make construction and renovation projects more expensive. This could deter or delay individuals from socio-economically disadvantaged backgrounds from undertaking necessary building work or pursuing housing in newly compliant structures. The possible outcome is a widening gap where higher-quality, safer buildings are predominantly accessible to the more affluent, exacerbating inequalities in housing and living conditions based on socio-economic status.</p>	22

**Richard Campbell**  
29 September 2023