



HOUSE OF LORDS

Industry and Regulators Committee

Corrected oral evidence: Building Safety Regulator

Tuesday 2 September 2025

10 am

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Members present: Baroness Taylor of Bolton (The Chair); Lord Best; Viscount Chandos; Baroness Drake; Lord Gilbert of Panteg; Baroness Harding of Winscombe; Baroness Nichols of Selby; Lord Teverson; Viscount Thurso; Viscount Trenchard; Lord Udny-Lister; Baroness Valentine.

Evidence Session No. 7

Heard in Public

Questions 82 - 96

Witnesses

[I](#): Lorna Stimpson, Chief Executive, Local Authority Building Control; Darren Ettles, Secretary, Association of Building Control Approvers.

Examination of witnesses

Lorna Stimpson and Darren Ettles.

Q82 The Chair: Good morning. This is the Industry and Regulators Committee of the House of Lords. We are conducting an inquiry into building safety regulation. Our first witnesses this morning are Lorna Stimpson, who is the chief executive of Local Authority Building Control; there is a lot of experience there, I am sure. We also have Darren Ettles, who is the secretary of the Association of Building Control Approvers.

As you will know, we have been taking evidence and hearing about some of the issues that have come up. I would like to start with a very open question. What is your experience of the building safety regulator so far, coming from your perspective? Also, what do you think of what the Government have been proposing by way of changes, given the pressures that there are there? Perhaps you, Lorna Stimpson, would like to start.

Lorna Stimpson: Just to introduce myself, as you say, I am the chief executive of LABC. We are the organisation that provides local authority building control with all of their education, learning, standards, guidance and development. I have been the chief exec since 2019. I am really pleased to be here; thank you very much for inviting me to give evidence.

On my experience of the BSR, a colleague and I have sat on the Joint Regulators Group since 2018, so we have very much been part of the development of the regulatory framework and the legislative framework; we have seen it from before the time when the HSE was going to transition into the BSR. We are very supportive of the legislative framework and think that it will achieve what it needs to achieve.

The BSR was set up very quickly from a standing start. A lot has been mentioned about teething troubles, which there have been and which we have witnessed. I am really pleased to see that the regime is evolving as that criticism, shall we say, is being faced by the BSR. Things are starting to move in a different way.

I very much understand and believe in the need for the new framework. The past eight years, with what has been found by the Grenfell inquiry, have proven that we needed reform. On the reform that the Government has brought in, which was announced just a few months ago, we very much welcome the move to the exec agency. The one thing that I have experienced in being quite close to the development is that the policy intent and the actual operationalisation have been a bit far apart, but I think that the exec agency will bring them together so that the policy intent has a more direct impact on how the regulator works.

So, from my perspective, it is good. I know the new leadership team well and have worked with them for some time. They are already reaching out

to us to develop that relationship. All in all, things have not been perfect—they have not been great—but I do think that they are moving in the right direction.

Darren Ettles: Let me introduce myself. I am here as the representative of the ABCA, which is the Association of Building Control Approvers. I have been in the industry for more than 37 years. I have worked in local authorities and the private sector, and I have set my own company up. I am the managing director and owner of a small RBCA that has 15 RBIs, as well as good admin support and some good management. I have been in the industry a lot. I have been involved with the ABCA, the Industry Competence Committee and building control working groups. I have tried to be very much involved with the industry and not an isolated, insular approver.

Our industry is very engaged with the BSR and the process. I think that the task given to the BSR by MHCLG was incredibly difficult. Creating a regulator from scratch in such a short period of time was an incredibly tough ask. The competence of the RBIs has been incredibly beneficial to the industry. Having the regulator over the entire thing—building control bodies, local authorities and our approvers—has been incredibly important. There have been some huge steps forward.

The ABCA very much supports the BSR, as we have done for many years, in the process of running the committees and having conversations—in everything. It has been extremely good for our industry; it has very much professionalised it. Obviously, there is criticism—there are processes that do not work as well, as well as communication issues and guidance issues; there is quite a long way to go—but, after a year and a half, the positives have far outweighed any negatives.

The MDT-HRB issue is a problem that needs resolving. The recent transfer into MHCLG has instigated a lot of change and created a new impetus, which is appreciated. In terms of those who are working on the MDTs—I am onboarding on to the MDTs at the moment; I am going through that process—I have spoken to quite a few people. It is a very good process. It is complicated—it has been extremely difficult for our industry to learn—and there could have been some better communication but, on the whole, it has been incredibly positive.

The Chair: We will want to unpick some of those issues as we go along, I think.

Q83 **Baroness Nichols of Selby:** We have taken a lot of evidence. I think we can say that it is a pretty mixed bag. There are those who think it is working really well and those who think it is not; then there are the rest, who sit in the middle. What impact do you think some of the delays caused by the BSR and the regulatory framework have had? You, Darren, have touched on that. How do you think all of this has impacted on new high-rise buildings—obviously, that is not in all areas of the country because lots of us do not have high-rise buildings—and the maintenance remedies in high-rise buildings? Do you think that these delays have had

an impact on the Government's housing and remediation targets? Do you think that they are a barrier to delivering new housing? How do you, as regulators, and the other regulators think these delays compare to other potential sources of delay, such as planning delays and skills? I have a supplementary question that ties into that, but let us do this one first.

Lorna Stimpson: Gosh—there are lots of questions in that one. There is no doubt that there have been delays. I am not going to justify those delays at all. I know that, in London alone, 20,000 starts were anticipated last year but only 900 happened. That has had an impact; there is no doubt about it.

It is not for me to say whether that has or has not had an impact. I know that the supply chain has been impacted enormously, even down to piling contractors. It has an impact on everybody. Reform was needed. Something needed to happen; a line had to be drawn in the sand. We could not continue to build as we were with an industry that had got into the state that it had.

I know that enormous steps have been made over the past few weeks and months. The Construction Leadership Council, which I know you have heard from, has worked very hard with Ministers, MHCLG and the BSR to bring about reform and start to do things in a different way. I am really pleased to see that pragmatism and real-world situations are starting to be taken into account now. That is not a criticism of what the regime was like before. There had to be a hard stop and we had to say, "Right, this cannot continue as it was".

This is going to sound derogatory but I am glad to see that common sense is starting to come into play now. I very much hope that things will start to move. I do not know whether they will move fast enough to achieve the Government's housing targets. There is a lot more that goes into housing targets than HRBs—a lot of volume housing makes up part of them—but the HRBs cannot be ignored.

There are delays; there are no doubts about that. I have my personal opinion on what could be done about some of those—oh no, I should not have said that; you are going to want me to say.

The Chair: By all means, tell us.

Lorna Stimpson: We may find in future that a layer of bureaucracy has been put into the process. There needed to be rigour and strong regulation but now is the time to ask, "What have we learned? How can we move forward here and still achieve what we wanted to achieve?" I say "we"; I mean what the Government wanted to achieve, which is safer buildings and people feeling safer in their homes. How can we do that while freeing up the system to work a bit quicker? Where are the delays happening? That is my opinion. There is no doubt about the facts that there are delays and that those will affect housing targets.

Darren Ettles: I am a class 3GH specialist RBI and a class 4 technical manager. I am a surveyor. I have boots in the back of my car and I am

on-site—I was on-site last week and I will be on-site this afternoon—so I have real-world experience of going through the BSR’s processes in relation to registration both as a company and as an individual. I am also getting much more involved in the HRB situation.

There are a great many designers out there who know exactly what they are doing in relation to designing and building to comply with the building regulations. Eighteen months ago, nobody knew the process. There are no regulations that say that buildings should be safe from fire; that is in one of the schedules to the building regulations. All the rest—the other 181 building regulations and RBCA regulations, processes and procedures—represents the problem with the system: the processes and procedures have to be taught from scratch.

A lot of the HRB processes are not about designing a building to comply with the regulations and getting a gateway 2; they are about how to transition a lot of the designs and the materials used, including how all that has an impact on the design and how to transition it into a construction compliance plan.

That is incredibly difficult because nobody has ever done it before. Some of the guidance could have been better. However, there are some very good principal designers, fire engineers, structural engineers and acoustic engineers. Loads of people have grasped it now. It has been an extremely long and steep learning curve but they are getting there now.

I do not think that we should be overly critical of the industry. It was a low starting point because we have never taken a design that is compliant and demonstrated how it should be built. A lot of skill there was left to the principal contractor. The industry may have lacked a lot of skills in building buildings correctly. It may be the interface of materials, the overreliance on certification, the overreliance on somebody else’s certification or buying the wrong screws, but there is a lot of stuff that is wrong.

The process that we are trying to achieve is a bridge between gateways 2 and 3. It is incredibly difficult but it is doable. There have been incredible delays. People are designing buildings to avoid the HRB thresholds. There are buildings—

The Chair: I am sorry to interrupt you but we have some external noise because we had to open the windows. Can you speak up a bit? When you get boats or planes going past, you really notice them.

Darren Ettles: I apologise. There is an awful lot of positivity coming out of the MDT processes, but it has been an extremely steep learning curve. The industry absolutely is getting better; overly criticising a process that is only just in its fledgling state is slightly unfair.

The design of an HRB might take a year. We had loads of transitional work thrown across half way through the process, so that learning may last eight months before you go on to your second project. Companies

are dealing with three or four projects at the same time. The learning is slow because these projects are huge. If we were redesigning loft conversions, we would be done in eight weeks—we would have done hundreds by now—but we are not. We are designing one of the most complicated, high-risk buildings that we have.

It is getting there, but a lot of learning is being and has been done. Once that learning filters through to the other organisations and the other processes, and once people move companies and take those skills with them, it will get better.

Q84 Baroness Nichols of Selby: This question is probably more for Lorna. We have heard a lot about building control. People are not making those choices to go into local authorities. I took the trouble of speaking to the assistant chief exec who has building control in his portfolio at my local council. A bit of background: we have just merged eight councils into one, and they had a private company running building control, owned by the councils, but the new councils brought it back in-house. But they are having lots of problems recruiting and are down to 50% of the staffing levels that they actually need. Some of that is around rates of pay et cetera, because, as you probably know, local authorities have got very strict point-scoring job evaluation schemes. To give additional money to staff—predominantly, I have to say, men—puts them in a very difficult position with equal pay.

I just wonder what they are actually saying to you to try to have that. The company gave them all cars. The local authority cannot do that because they would have to give a thousand home care assistants a car, and they cannot afford to do that. I just wondered what was happening with that, because that seems to be the evidence that we have taken from people as well. The responsibility levels are much more than they were, and people can go off into the private sector, I am told, and earn more and not have the same responsibility levels, so this is slowing some of this down.

Lorna Stimpson: How many hours have you got for me to chat to you about this? This is an issue. There is no doubt about it. Local authority single status job evaluation, as you refer to, means that local authority staff should be paid similar wages, and quite appropriately so. We are very much—when I say “we”, I mean LABC—lobbying local authorities. We have just put a proposal to the independent panel for support in trying to make a special case for building control to be brought out of that single status, so that local authorities are able to pay building inspectors what they need to pay them to retain them.

I think it is fair to say that in the private sector they are paid more. There is very much a demand for building inspectors. In the private sector, the salaries are commensurate with the responsibilities and the role. A registered profession, which is what building control now is, has to prove competence. Fortunately, I do not have to do it any more; there is no competence validation for chief executives. But, when I was a building inspector, like Darren, I would have had to go through that pain every

four years to keep proving that I knew what I need to know to make buildings safe. Very few other roles within local government have got that level of need to keep proving your competence and ability—and do not forget, competence is not just about what you learn; it is about your skills, your experience, your knowledge, your behaviours.

Salaries in the private sector are double. Not only that, but it is a question for Darren as well, because he now is facing competition for staff from industry. Tier 1 contractors now see building inspectors as a valuable commodity, so they are paying even more because it is that building inspector who will be able to help a tier 1 contractor or a developer get through the gateway process with the BSR. So salaries are going up and up and up. As a building inspector myself, once upon a time, I think that is fabulous; it is now actually recognising my profession for what it should be. But working within local government is difficult. Local authority building control does not just deal with HRBs. When there is a dangerous structure, a vehicle impact on a building, or a gas explosion, it will be that same building inspector who is out at two o'clock in the morning working with the emergency services to deal with that and make buildings safe.

We need those people in public service. We have got to retain them, and we are losing them. We lost lots of people when we went through the registration, and the whole process of reform in the building control profession lost an awful lot of people. We are a very ageing community. Most building inspectors look like Darren and me; they are not young people in building control, because the investment has not been there in local authorities for a long time, for lots of reasons—for austerity reasons. We were very fortunate in LABC and in public service to have been given a government grant in 2023, and we brought in 150 new trainees. I am delighted that we are getting towards the end of their training now; 90-odd of them are already class 2A building inspectors and have been taken on in direct employment by their local authorities.

We need more investment. A hundred and fifty trainees will not make up for the possibly 1,000 building inspectors that we lost through registration of the profession, and we are going to continue to lose more and more people as people get towards retirement. We have got to invest if we are going to have a building control profession in the future, but also to have a profession within local government that does all of the other things—whether it be making sure that Old Trafford stadium is fit for people to go in and watch the football or whether a building is made safe after something occurs to make that building unsafe. We need building control in public service, so something is going to have to happen, you are absolutely right.

The Chair: Thank you, that was very helpful.

Q85 Lord Best: I have more about the registered building inspectors. Some of your members and their staff have been part of the building safety regulator's multidisciplinary teams. My question is about how they have found that experience. Do the MDTs have a clear understanding of the

standards that projects are supposed to meet? Do we need a bit more clarity? Dame Judith Hackitt, in her review, pointed to the approved documents as the culprit for creating a certain amount of ambiguity and inconsistency. Do we need better guidance on those for the multidisciplinary teams? Is this a key aspect of getting things faster through the system, and are those approved documents really at the heart of where we need more clarity?

Lorna Stimpson: Do you want to go first, Darren?

Darren Ettles: Actually, I just wanted to make some comments about the salary, if that is all right, because there has been some conversation about salaries and resources and things like that. So, before we go on, is it okay if I just step back? I completely agree with Lorna. ABCA attended a meeting six or eight months ago talking about creating a more level playing field in relation to salaries. I do not think we are quite double the local authority salaries, but we do pay more; that is absolutely correct. There is a problem with local authorities in relation to appreciating the importance of building control within that structure, and the ties that prevent people getting equal pay in relation to the approvers is a problem that should be addressed; ABCA completely and totally agrees with that.

There is a resource problem in relation to RBIs working in the local authority. As Lorna says, it is part of the dangerous structures, skips and scaffold licences and other things. RBIs have restricted activities and restricted functions. We give advice, we do plan appraisals and we do inspections on site. My personal opinion is that dangerous structures within the local authority should be dealt with by a structural engineer. We are not necessarily structural engineers, and we are not trained nor qualified to do that. We have got an incredible experience of buildings and we understand structure, but we are not structural engineers. When I used to work for a local authority, I did dangerous structures. I do not think it is an appropriate use of an RBI these days; there are better things that we should be doing. I also think that anything that draws away from those restricted activities, functions and advice should be done by somebody else.

We do have a limited resource. We are a pool of people. There have been people who have left the industry. I have to slightly disagree with Lorna: the reason we needed reform was that there were people on the ground, wearing boots and high vis, who should not have been doing it. They were not actually competent to do the job. A percentage of people have left the industry because they have not been competent: they have not wanted to go through the competence schemes. I absolutely accept that a number of people have left where it is a shame: they were very experienced and knowledgeable and they have gone on to the client side. So the skills are still there in the industry. They have not disappeared. Hopefully the people are working on the MDTs and getting it right.

There are nearly 4,000 RBIs who can work. A percentage of them are class 1s and have to be supervised, but about 4,000 RBIs work in the industry. The number of applications that are made per year to building

control is getting on for 300,000. When you break those numbers down, an RBI, whether they work for a local authority or in the private sector, might get about 14 applications a month. That is not a big number if they are all domestic extensions or new-build houses. Some of them are very large projects and one application could be 200 houses. But the percentage of applications that are small is 90%.

Perhaps we should reassess the role of an RBI. The company I own, and most approvers, tend to deal just with building control: that is what we do. Some deal with warranties and some deal with other things. If we pulled those resources back to restricted activities and functions, I think resources would be nearly enough. I think local authority resources could similarly be enough if they concentrated on just the processes.

The Chair: So you would compartmentalise different aspects of your work?

Darren Ettles: An RBI should be just an RBI; it should not deal with dangerous structures and other things. I do not think it should deal with warranties. ABCA very much supports this. RBIs are not the same as anybody else in the local authority; they are not the same as planners or environmental health officers. It is a different world and we need to be treated differently. The salaries and everything like that should be recognised.

As a company, I am now losing staff to the local authority. Some of my staff are paid 10% to 20% more than the local authority pays. I have now lost a member of staff who used to be paid more than a local authority pays. They have gone to work for an agent who works 100% for the local authority and their salary has doubled. I cannot support that.

The Chair: Nor can the local authority.

Darren Ettles: There are local authorities that are doing fine. There are local authorities on LinkedIn that are saying, "Yep, we've passed our audit, we've got plenty of staff, it's absolutely great". There is a local authority very close to me up in North Yorkshire. When I worked for it 25 years ago, it had 10 surveyors. Last year, it had none for a period of time, but it has now addressed this and it has four. So there is a possible solution and it can work. That organisation has grasped the problem. It has now employed four surveyors. It has RBIs. Some 50% of RBIs do not work for approvers.

Q86 **The Chair:** Thank you. I am very conscious of time. This is interesting, so perhaps I could remind you that you can always follow up with extra information that you think might be helpful. Perhaps we could go back to Lord Best's point.

Lorna Stimpson: Lord Best, if you want me to respond, I think you were asking whether MDT members understand the requirements, the standards and the required evidence for an application on HRBs. I think, by and large, yes. The thing we need to remember is that the approved documents and technical guidance for large, tall buildings is the same

whether they are HRBs or other complex buildings. By and large, that has not changed a great deal. It is the procedural requirements of working on HRBs that are different. That has changed. Everybody in the industry, whether they are building control surveyors, developers, contractors, designers or fire engineers, has had to have a new way of working, and they have all had to do that at the same time as the regulator. They are going concurrently through that learning curve.

Did they understand two years ago? No, not necessarily. I do not think we knew what it needed to look like. I do not think that anybody knew what good looked like at the time. But I know that they know what good looks like, and certainly what bad looks like, now, and I think that they are moving towards achieving the end result that is a speedier turnaround. As Darren said, there are a select few people who work on MDTs. Not all RBIs can work on MDTs, because they have to be in a certain class of registration and there are fewer people in that class than there are across the whole spectrum of building control. So we are looking possibly at only 400 or 500 people in the whole of England and Wales who could work on MDTs. So, yes, by and large building control is beginning to understand what the regulator expects, bearing in mind that these people have worked on large, complex buildings for many years, in a very difficult regulatory regime.

On approved documents, Dame Judith was absolutely right that the situation is confusing. They should be used only by people who know how to use them. They are not things that anybody would want to pick up for a nice read. They are technical documents that should be used by people who are appropriate to use them, with the appropriate competences. I am not sure that they need to change: they are technical guidance about how things are built, as opposed to the procedural guidance around what you are supposed to understand—the safety case of how you design a building so that it can be occupied and managed. From inception right the way through to the demolition of that building, there is an understanding and a holistic approach to the safety of the building that is a very new concept to the whole construction industry, and to designers as well.

At one point, you would design a building and not necessarily have to concern yourself a great deal with how it will be used and managed in the future. That can no longer be the case, and that is what this reform has done. It has been a steep learning curve. Why was the guidance not there at the beginning? Industry needed to help create that guidance. That is what the CLC has done recently: create guidance to support industry, regulators and MDT members to move forward.

Darren Ettles: The approved documents cover all building types. An HRB going through an MDT process has fire engineers. A fire engineer dealing with an HRB does not usually approve documents. An acoustic engineer does not usually approve documents. There are so many real experts on MDTs who do not use the approved documents. The approved documents are not without flaws and there are developmental processes that should be put in place to bring those documents up to scratch.

There are many changes in philosophy in relation to how buildings are built and materials used, and processes. Yes, they do need revisions, but I do not think this is an MDT problem. The people who are on MDTs are probably very well qualified: they are part of professional bodies, they do CPD, they have degrees and they know exactly what they are doing. It is the process that is the problem: I do not think it is the guidance in relation to MDTs. It is the process that is the biggest challenge: how to transfer that appropriately safe design into a construction plan and deal with the actual construction phase.

Lord Best: What is an example of that process? What is the change between before and now? You are attributing the problem to the process but I need a bit more understanding of what has changed in terms of that process. What are people having to do differently?

Darren Ettles: If you had a building that required sprinklers, say, the sprinkler design would be designed and commissioned to obey a British Standard. Previously, you could say, "We will have sprinklers because they're required. It's part of the guidance, the regulations and the British Standards for fire safety engineering. We will have sprinklers", and everyone would say, "Yep, that's fine".

The sprinkler company tendered for the project. The HRB might be on-site for a year or two. That sprinkler design was put together in principle at the start of the project. Certain tanks, certain-sized pipes and certain riser ducts were required to accommodate that sprinkler system, but the actual detail was fleshed out at the end of the project. Projects go through a bit of evolution. There are changes. Sometimes corridors are moved. Sometimes more flats are added. There are things that change, so you do not design it in detail up front.

The MDTs require you to put in an awful lot more design up front. We never did that because buildings change. Design and build is not necessarily a bad way of doing it if it is done well. If you did a design and build contract through an MDT, you would still end up with a safe, compliant, certified building at the end—it would just be a different process. The MDTs require information to be provided up front: how will that roof covering be integrated into the rest of the building, the rest of the elevations and the other materials there to create compliance under Part C on moisture ingress? That is a complicated process that we have never done before. We just said, "We're going to have tiles. We're going to have an EDPM-type material". How that integrates into the building was never written down.

Lorna Stimpson: May I add to that? This is where the pragmatism and the real-world situation are now coming to bear. I do not necessarily agree with Darren about design and build. I remember Dame Judith making it really clear that buildings should not be made up as you go along; there was a little too much of that. There is a happy medium somewhere along the line where you are not just building things and saying, "I'll send you the information later, don't worry about it". To be fair, that was the case in some buildings and it was not appropriate, but,

at the inception stage—prior to commencement, I should say—you are never going to have the absolute, finite detail of every paint finish on every wall. However, you certainly should have sign-off on the design for the foundations before you put the foundations in. That makes sense, does it not?

I am really pleased to see that pragmatism coming into play. We are starting to see staged approvals as an appropriate way forward. This will help because, when you think about HRBs and how huge some of those buildings are, it is difficult for the MDT to deal with the amount of information. I go back to my days, when there were pieces of paper in boxes. You would have 20 or 30 boxes of plans for one building. It does not look quite the same now, but the volume of information is still too much.

There must some way of saying, “No, you can’t put the foundations in until we have agreed that they’re right”. That is where pragmatism and evolving through this process are making the process better. I am not saying that I did not feel as though I was banging my head against a wall for a long time in talking about how building control and construction projects happened prior to the HSE taking over as the BSR and in saying, “You don’t get that information so early on”. It was never going to happen, but we have gone through the process now and I am not going to say, “I told you so”.

Q87 Baroness Harding of Winscombe: That is a very good segue to what I wanted to explore, which is communication between the MDTs and applicants. We have heard from the industry that it wants better communication and engagement with, as well as feedback from, both the BSR and its MDTs. We have heard that there is communication between applicants and the MDTs sometimes but not always. From your perspective, how open is the communication between applicants and MDTs? How open should it be? How do you get greater consistency?

Lorna Stimpson: There was not any. In hindsight, that was quite a purist approach to the issue Dame Judith had found—that regulators were not able to be robust regulators because they were very involved with the design team. She was not wrong. I am not saying that it was in every instance—it certainly was not—but they wanted there to be this separation.

I understand the need for that separation, but the purist view was that the regulator was going to provide that interface. You had an MDT over here in your RBI—your professional registered building inspector—and your fire and rescue service. They were informing the person who sits in the middle: the BSR. You then had the regulatory lead, who sits in the middle of the BSR and who had the contact with the applicant’s professional design team. Much was lost in translation. It was a very difficult situation. We said for a long time that there needs to be that direct communication. You cannot go through somebody in the middle who does not have an equal level of construction industry experience.

I say that with no disrespect to the regulatory leads. They have done a fantastic job, but they were put in an unenviable position: talking sprinkler systems with a design fire engineer when they do not know what one is. So we are really pleased to see all of that starting to come together more so that the professional MDT members are able to deal with the professionals but still have the robust regulatory ability to say, "No, you've got to come back to the regulator. You can't choose your regulator. I am it. This is what I think. Convince me otherwise if you think that that design is appropriate", et cetera.

Pre-application advice was also a massive issue. All building control bodies, whether they be in the public or the private sector, have always had some involvement with the scheme before it gets to the application stage. I know that you have had people from industry here saying just how involved it is to get from inception to putting a building regulation application in and saying that needs support, advice and help. They need to be able to ask, "Does this look okay to you?" For a long time, the BSR thought that that was not an appropriate way forward or an appropriate use of its time.

Now, we are seeing more pre-application advice; the word "advice" is a bit of an issue at the moment, but pre-application conversations are starting to happen with the right people in the room. We are at the beginning of a better way of working—I firmly believe that.

Darren Ettles: Because I am an RBI, I talk about the nuts and bolts. I am very granular in how I view things. I am a class 3GH specialist. I am not a structural engineer. I am not a fire engineer. I am not an acoustic engineer. I have no other engineering skills. I am just building control.

I have sat in design team meetings and provided compliance advice, but it is not technical. I do not say, "That sprinkler size needs to be 20 millimetres". I have no skills in relation to that; none of us does. There are some building control people who are structural engineers, and some people are fire engineers, but generally we are not. We do not sit in design team meetings giving technical design advice because we cannot. We can only give compliance advice, and as we have discussed, compliance is mostly to do with the process. If I have a fire engineer, a structural engineer, an acoustic engineer and an M&E engineer, I am not telling them how to do their job; I am just telling them how to address the building regulations, and it is a procedural thing. The MDTs did not have that communication. As Lorna said, there was none. Some people actually quite enjoyed that, when they were working on the MDTs, because they were not getting the questions of "How do I do this? How do I do that?", but that was a problem because there was no procedural explanation.

The reason I am asking you to confirm why your membrane meets certain regulations or a certain requirement, or integrates with a certain building, is this: I am not giving you the answer, I just want to ask you a detailed question. That was missing. I think that has been changed now,

and there is actual integration between the RBI and the designers, and the clients as well, so I think this is an incredibly important step forward.

There is always this conversation about us overstepping the line and getting involved in design. If I am looking after a domestic extension or a loft conversion—I have seen thousands and thousands of them—I know what insulation is required, and if the builder asks, “What insulation is required?”, I can tell him. That is not me designing it; that is just me going, “I know this as a fact”. I should not do that. I should point him to the approved documents, I should point him to the guidance, I should open up a website and say, “Fill these details in, it’ll give you the answer”. On an MDT, the level of expertise required to make those decisions is far beyond what I have, and we do not design buildings. Us being involved in advice in relation to the procedures and the processes and the principles is vitally important.

Baroness Harding of Winscombe: The other thing we have heard is that different MDTs have given varying and quite contradictory advice to different applicants, often with the same building: multiple buildings being built on a site, different applications, different MDTs. How do you think the BSR can ensure greater consistency in the feedback and advice MDTs give to applicants?

Darren Ettles: I think it is incredibly difficult. If you took three RBIs out on a building site and said, “What do you think of that?”, you would get five opinions. We do not have any really good standardised guidance. The building regulations are related to statutory law and also related to Schedule 1 which is “Structural stability should be maintained”, and “Fire safety should be maintained”. There is not a unifying degree course that you can go on that teaches you this. There is not a unifying process. The LABC has probably done more than anyone else in creating unified courses for the LABC. They are not available to us, because we are not LABC. As private sector organisations, we use other organisations like Total Training and Development, and there is a degree at Wolverhampton University, but they are not granular, so they are very high level.

I think it would be a really good idea if we had a single body that actually provided guidance and information. It might be a BSR thing. It might be a combination of ABCA and LABC. It might be something where we can start looking at the entire building control process and going, “This is how you deal with an application. This is how you deal with a fire authority consultation. This is how you deal with a site inspection. These are the limits of your involvement”. If an RBI is on an MDT, yes, you will get different advice, just because we are all different people. We have different backgrounds and experiences. I have been doing this for a very long time, but somebody that has maybe been in the industry five years might know something better than I do. They might give different advice. I just do not know what they know and there is no way to unify it at the moment.

Baroness Harding of Winscombe: Gosh. Lorna?

Lorna Stimpson: I agree. It is not helpful for industry if you have five identical buildings on a site and you are getting five different opinions. Most certainly that is where the regulatory lead from the BSR should come in and say, "I've got five different answers to this same question—which is the right one?" You have to appreciate that although they might look identical, those buildings may be used by different people, and therefore the occupancy of those buildings will impact on the design and the requirements of that building. That is where the BSR's regulatory lead should come in and provide that consistency of approach.

I would like to know whether more direct contact between MDT members and design teams will still be an issue in the future, or whether it is an issue that has been found so far, before the new ways of working have been put in place. I know that the regulator has been working with some contractors to start looking across their portfolios, as opposed to looking at individual buildings. There are lots of different ways to carve that whole way of working up, and lots of different ways that would work, so that you would be dealing with people who are consistently looking at the same things.

Darren Ettles: Can I make a follow-up point, please? The Dame Judith Hackitt reports regarding Grenfell took away client choice in relation to HRBs. I think that what you are doing is highlighting that one of the problems of a client not having choice is that, if they have built a building and it is fully compliant and everyone has done their job properly and they are building exactly the same building, they may prefer to choose that organisation again because they have got the skills and the previous knowledge of the thing that they have just finished. That is a huge benefit of being able to choose. It is not degrading to the lowest choice, it is saying, "This person just knows what I am doing and I've got a good working relationship with them, and I'd like to work with them again, because it is just the same". It might be a point that the BSR may wish to appoint MDTs a little bit more pragmatically or intelligently. If you have got three buildings that are exactly the same, just stick the same people on them and you will get the same response.

The Chair: Viscount Trenchard has got a point that actually follows on from this quite well, about organisation by organisation. Do you want to come in there with the point you were going to ask about organisation by organisation?

Q88 **Viscount Trenchard:** Yes. We have heard that the BSR would like to be able to issue notices on an organisation-by-organisation basis, rather than the current system of doing it building by building. Obviously, it has limited resources and the number of buildings is vast. What do you think? Would you support a move to the BSR focusing on organisations, or do you think that that would lessen its focus on local conditions and the safety of individual buildings?

Darren Ettles: I quite like that idea. It is almost as though you are saying to an organisation, a group, a design team, "You know what you are doing, and I am going to give you a licence to build HRBs because

you have demonstrated the skills, knowledge, experience and behaviours to do so", and you almost license that organisation to build those pieces of work. I do actually like that. It is almost lending itself to a fast-track HRB MDT process where, because the organisation is already demonstrating that it knows what they are doing, there is almost a fast track. Yes, all the plans and details do need to be provided, and the designs have to be provided before you build it on site. The inspection processes would be quite interesting, because I am not quite sure how gateway 3 would work in that sort of way, but as for gateway 2, if an organisation has already demonstrated those skills, yes, I think that could work.

Viscount Trenchard: Particularly where an organisation is developing a large number of identical buildings, it would seem to be much more efficient.

Darren Ettles: Absolutely. If you have got a type approval, yes, absolutely.

Lorna Stimpson: Yes and no, which is not a really good answer, is it? As I said before, there are lots of ways to carve this up, and I do not think coming up with one answer is ever going to be the answer. Workstream management in the BSR has got to be a little bit more reactive and, if you see five buildings come in that are identical, as Darren says, use the same MDT team on them. But I would guard against making a decision: "I am going to go and look for all the buildings that may look like that". What are we trying to achieve? We have to go back to the exam question, which is safer buildings. I would not want to breed complacency. I like a little bit of variety of MDTs on a building because, as Darren clearly said, what one RBI knows, another may not know. Having a little flexibility and more than one person looking at the same detail actually must lead to better outcomes, particularly in a non-prescriptive regulatory environment like ours. I like a little bit of scrutiny and oversight. I do not think there is anything wrong with that. It is not an answer to your question; I am so sorry.

Viscount Trenchard: On the one hand, and on the other hand, yes.

Lorna Stimpson: Yes. It is about work flow and workstream management. If that looks better on that particular day, let us group them together, but let us not make a policy decision. If you are at the end of the line and you have only got one building, you do not want to have to wait for all the other buildings to be dealt with before yours is dealt with as an application.

Q89 **Viscount Chandos:** We have danced around the interaction between the industry and the regulator in different ways. To what extent are the delays in gateway approvals by the BSR the result of developers, building owners and property agents not really understanding what is required? We have heard from other witnesses that they are confident that the culture of the industry has changed. Do you think that culture has changed, and therefore there is a real commitment to understanding

what is needed?

Lorna Stimpson: The industry has had a lot of bad press and has been told repeatedly that it did not know what a safe building looked like, and that the applications that it was making to the BSR were unsatisfactory and incomplete. That may be the case in some instances, but not across the board. There are bad actors in all areas, and those bad actors' applications should not even get to the validation stage. They should be handed back and they should go and improve their competence and their abilities. The organisations that have been particularly affected by this, which are the large tier 1 contractors—I am not going to name any names, but those who are committed to helping to achieve the Government's housing targets—do have professional design teams. But, as I have said before today, nobody knew what good looked like. Nobody at the beginning of this process knew what the regulator wanted. I am not positive that the regulator, although it knew what it wanted, had it written down on a piece of paper. It did not have examples of what good looked like.

So it has been an enormous learning curve. There has been a lot of criticism. Everybody likes to blame somebody else, do they not? Two years is not a long period of time in a construction industry that has existed for ever with the regulatory regime that we had prior to the Building Safety Act. For all those design teams to amend how they work, to interpret the legislation and guidance, and then to interpret what it means for them and how they then make a building regulation application and what the regulator wants et cetera, has been a process that we have had to go through. I am very hopeful now that, two years in, we are starting to understand what good looks like, what bad looks like, and that, going forward, there will be more examples of that and we will have professional organisations out there that will support applicants going through the process; they are emerging, and quite rightly so. Things will get better.

Viscount Chandos: But in saying, if I understood you right, that you feel the industry had had an unfairly bad press, does that imply that you think there was not a problem of culture?

Lorna Stimpson: Oh, there most certainly was a problem of culture, and there still is. Sorry; I did not answer the other half of the question. Cultures are changing. For HRBs, the change has been forced. I am afraid that most people do not do anything unless they have to. I dare say that people do not always comply with the speed restrictions unless somebody is watching them, or there is a camera or a police officer standing by. We have to be forced to do things. I am afraid that the new regime will take a long time to filter down into the construction industry. Darren has mentioned a few times today domestic extensions—loft conversions. It is going to be many years before that end of the construction industry feels any of what is going on at the top end. But those who are dealing with HRBs will also build other non-HRB complex buildings, so you would hope that the reform—the different ways that they work on HRBs—will start to

filter into the way of working on other buildings, and through subcontractors.

Eventually, the culture of the construction industry will change. It is that word—I say it quite often—“integrity”, having integrity and doing something right even when nobody is watching you. That is something that the construction industry has not been terribly good at in the past. It needs to change. That is culture for me—doing the right thing, whether you have got a building inspector watching over you or the BSR or whoever.

The Chair: We are running short of time and have our next witnesses here in the room, so can I ask everybody to be very brief with questions and answers, please?

Q90 **Viscount Thurso:** We have heard from a number of witnesses that there could be efficiencies in the gateway process. You have already answered a lot of this so, listening to the Chair, do not repeat it. One, for instance, is the grouping of applications for similar buildings, and you answered that with Lord Trenchard. Another one was: could there be efficiencies around the lesser, non-safety critical renovations, and could other building control authorities take on some of those applications? Perhaps, Darren, that is one for you.

Darren Ettles: Absolutely. Yes, there has been a culture change and it is very slow; it is happening. But in relation to the category B non-safety work, it is all safety, it is just different types of safety. We do concentrate on fire safety far too much, but ventilation is safety because people die from respiratory stress due to black mould. It is all safety. I am a class 3GH surveyor. If you said, “I’ve got an internal flat on floor 15 of an HRB”, I am skilled and have the knowledge and experience to be able to deal with the building regulations with that and make sure that it meets the regulations. I have no issue with doing that myself. I would suggest that most class 3Hs could do that. If you want to do that as a separate part and I just submit my findings to the BSR for it to issue a certificate on cat B work, I would be happy to do that. Anything to get the cat B stuff off the BSR would be an incredible benefit. I do not think there is a need for BSR to be dealing with that.

Q91 **Viscount Thurso:** Thank you very much indeed. Lorna, unless you disagree with that, I am going to go to a separate question for you. Industry has suggested that the gateway 2 process does not line up terribly well with how developers actually procure contractors and designers. So the question is: is there room for looking at what is in which bit of the gateway process to make something that is more aligned with industry practice, or, critically, is it that industry practice has actually got it wrong and it is time that it started to do it the way the gateway process currently is?

Lorna Stimpson: I am going to say the same again. It is a bit of both. I did touch on this before in terms of staged approvals. Industry could be accused in the past of, as Dame Judith said, making it up as it went

along. That had to be acceptable: there was no option but to accept that in some circumstances. That has changed. But we have gone too purist in terms of, "Let's have every detail of every screw that you are going to put in that building up front". That cannot work; it is not practical. Something in the middle is the absolute way forward.

Viscount Thurso: Would a fair summary be that the industry jolly well did need to improve, but, at the same time, as part of that improvement, there is room for better alignment?

Lorna Stimpson: Yes, absolutely. Much more well said than I did. Yes.

The Chair: So we have agreement there. Baroness Valentine is online.

Q92 **Baroness Valentine:** Do you feel that the BSR has sufficient resources to ensure the safety of buildings and to provide timely approvals? Is there a need to give the BSR more funding? If so, should developers and building managers accept an increase in regulatory fees to allow for this—or, if not, is the only alternative greater public funding?

Lorna Stimpson: I do not think it is my place to speak about the funding the BSR has already had. I would like to point out that the BSR has a much wider remit than just building regulation applications: being a building control authority is just one small part. That is where, as far as I was aware, building regulation fees are on a cost-recovery basis. I would not have thought you could increase them substantially. I am not at all sure that those who are being regulated know how much their building regulation fees are yet.

So we need to just bear in mind that the BSR's remit is wider. It is about the competence and the culture of the industry. It is about regulating the building control profession. Yes, it needs to pay for itself to do exactly what it needs to do. In terms of taking on hundreds of new staff, I personally would not like the building safety regulator to be taking building control surveyors into its ranks. I think that is not a good move. You need to leave building control surveyors to do what they do in the organisations they work within and second them into multidisciplinary teams as and when you need to do that, because there is work out there other than HRBs. Whether you are in a public service role or in a private sector role, you are not just focused on providing this work. The profession is already so hugely underresourced and I would not like to see even more resource taken out of the profession to put into the BSR on a permanent basis. That would not be a good step forward.

Darren Ettles: I agree with Lorna that RBIs are much better off being RBIs, out doing the job. Taking RBIs into the BSR would create isolation, insularity and elitism: "That is just what they do and they do not do anything else". I do not think that would benefit the industry and it certainly would not benefit resources. As Lorna says, theirs is a much bigger remit.

Resourcing is an issue, but it may have as much to do with IT processes and procedures, and having a better way of actually putting information

into the MDTs: a better way of us actually being able to register as RBIs and RBCAs, because that side of it does need an incredible investment. If you got the IT right, you might find that you do not actually need as many staff, because it just works better.

There is a problem with communicating with the BSR and it is an IT one. Dropboxes and things like that do not work in our industry. It just needs to be a lot better. The administrative processes of the BSR, such as the feedback coming back from audit, are slow. There needs to be a faster audit process. Any disciplinary matters need to be dealt with faster. There needs to be feedback to the industry. We have had a year of audits: 20% of LABC and 20% of approvals have been audited, but nothing has been told to the industry about what was found, what was wrong and what industry needs to improve on. If that is where the resources are going, it should allow that information—that feedback loop—to come, so we can learn from it. Great—absolutely fine. In relation to MDTs, it is the clients who need to be doing the work: the principal designers, the contractors, the structure engineers and the fire engineers. That is not an MDT issue. The BSI is a bigger beast and there are better ways of spending money to improve our industry and the culture.

Baroness Valentine: Can I just check I have understood something? Do you think a lot of investment in IT is required and, by implication, greater public funding?

Darren Ettles: Yes. It is a sort of one-off lump. It does not need to be year on year. It just needs setting up properly; I do not think they had the funding from day one.

Q93 **Lord Udney-Lister:** I think you touched on a little bit of this just as I was arriving, and my apologies for being late. Also, I need to declare an interest: I am a director of a property company and a housing regulator. That is in my declaration of interests. The Government have set out plans to increase the staffing of the BSR. There are also proposals for the BSR to retain greater expertise in-house, rather than subcontracting a lot or contracting experts out from other sources. So my question is: are there sufficient skilled staff overall for the regulator to undertake its work?

Darren Ettles: There are 550 class 3GH surveyors. It would be very difficult to lose a significant number. I think the skill set required to be on an MDT and to understand the industry is evolving. If you take people out of the day-to-day and put them in the BSR purely to concentrate on HRBs, there will be a loss of skill and you will end up with a very insular model. One of the problems of the competences is that you do need experience of all building types to be a class 3H surveyor. You cannot just be an HRB surveyor. You have to know a lot more. So there is a problem with the process.

But I would not encourage the BSR to take surveyors internally. There are lots of people who are very happy to work for the BSR one, two or three days a week. They recently went out to industry and said, "We need more surveyors five days a week", and there was almost no take-up

on it. They then went out and said two or three days would be fine. There is a lot of take-up and there are, I think, about 20 surveyors who are now engaged with that, because they can give some of their time, but not all.

Lorna Stimpson: Perhaps I could add something on building control. We need that vital resource within local authorities and the private sector, because those are the people who train our new generation of surveyors. The experience these people have is invaluable and we cannot lose them from our industry. Losing them directly into the BSR would mean, as Darren rightly says, that they would deal just with HRBs day in, day out. We need them to train the next generation, but there are lots of other complex buildings which that class of building inspector works on, including tall office buildings and other buildings in London. You look around and they would fall within that class of registration of building inspector. Who would deal with them if we were going to strip them out? Who would deal with the dangerous structures in local authorities, or the safety of sports grounds in local authorities, if you stripped that most experienced resource out of building control? Please do not do it.

Darren Ettles: Can I give a follow-on? There are 550 class 3Hs. If you took 50 of them into the BSR, the BSR might run better. The others will have no 3H experience. So, when we come around to the new level of competences, I will not be able to pass, because I have no experience. Those 50, absolutely great—but they will be retiring at some point. If you just say, “Everybody do two days a week”, you will get the skills you want, but there will also be supervision and training. I will be able to invite one of my colleagues along to sit in on an MDT to learn the skills and walk on to an HRB building site and look at it, isolate it. And how do the class 2s get on?

Lord Udney-Lister: Can I quickly follow up on that? You made a pretty impassioned plea—“Stop taking my staff on the way”—but what about other skilled staff in other areas of building structures? Is the answer to this greater collaboration and working together, rather than necessarily employing more and more staff internally?

Lorna Stimpson: I agree. The BSR secondment model could be made to work. Again, we need not to lose sight of the fact that the BSR’s remit is far wider than just building regulation application. Going back to the beginning, when the BSR was set up—how can I explain it? There are so many interdependent moving parts here; I am sure that that is the problem. The BSR was brought in not only as an oversight body for building control and the industry but as the Building Control Authority. Now that we have a very robustly regulated building control profession, which, let us face it, was not there before, and as we continue with robust regulation of that profession, the BSR could perhaps have a lighter-touch approach to being the Building Control Authority. That could be a way forward.

This leads into category B, the smaller, domestic-type refurbishments and alterations within HRBs that could be dealt with in a slightly different way

and not have to go through the rigorous regime of using the BSR. That could perhaps be another way of carving things up.

Darren Ettles: To use the analogy of a hospital, I am a consultant but there are also doctors, nurses and orderlies. There are so many people behind the consultant to do the work. As a company, I have those people. They are exceptionally good. They allow me to do my job, but I put only a small amount of time into the work that I need to do because I am the consultant.

The BSR sometimes lacks those other people in the industry. I do not need to do all of the legwork. I could have an admin person sat beside me at my desk in my office dealing with all those bits of paperwork and sifting through what I do not need to do. I have some very good people who could do that easily because they do it day to day. The BSR may lack that level of expertise in the rest of its structure.

The Chair: If we are very quick, we might be able to get our other colleagues in.

- Q94 **Lord Gilbert of Panteg:** My questions unpack a set of issues that we have not really addressed yet so, if the chair agrees, I would be happy for the witnesses to reply in writing. Let me briefly outline my questions. You have been very generous but perhaps you could give us a bit more time and draft us a reply.

I want to ask about two things. First, we have heard some evidence that the BSR is not sufficiently focused on lower-rise buildings—we have been chasing your views on that—and that progress is being made across different types of buildings. Secondly, what impact has the BSR's regulation of building control authorities and housing inspectors had on their competence and skills? Is there a step change or improvement? Is it noticeable? Is it on its way? To what extent has the introduction of this regulatory regime led to some staff leaving the sector because of the impact of the regulation? If you are content, we will put all of that in writing to you.

The Chair: Some of your questions, Lord Teverson, have been covered. Do you want to add anything?

- Q95 **Lord Teverson:** I want to come on to one bit of what I was going to ask. There is a market out there for approval of building regulations. It strikes me that there is a conflict of interest there. Construction companies and developers are, in a way, paying for their contractors to mark their own homework. Is that still a problem in the industry, or has it never been one? This has always struck me as something that is of real concern to occupy us.

Lorna Stimpson: To clarify, from my perspective, what we are talking about is commercial interest. For me, conflict of interest is a more personal thing: "I'm going to make a different regulatory decision because I'm conflicted". With commercial interest, I might have financial pressure to make a decision. It is certainly far easier to regulate in a

public service environment than in the private sector, I am sure of that, because you have the weight of the public and political scrutiny of public servants, which we know exists.

As you will be aware, one of the Grenfell Tower Inquiry's recommendations was to look at exactly that: should commercial interests be removed from the building control arena in order to serve public safety better? An independent panel led by Dame Judith is looking at exactly that at this moment in time.

Lord Teverson: Tell me what you feel, Lorna. Give us your gut reaction to that.

Lorna Stimpson: I feel that, in the past, building control has been exploited and been made a commodity, a tick box—something that a developer has just got to get in the best and easiest way. There are bad actors in construction companies who want the least intervention at the least price. I am hopeful that the independent panel will start to put things in place to make sure that that cannot happen. Has regulation of the profession—this goes back to Lord Gilbert's question, which we will respond to in writing—improved things? Yes, it has. Will it continue to improve things? Yes, because there will be that really detailed scrutiny of companies and local authorities to make sure that commerciality does not come into decision-making.

I am very hopeful that Dame Judith's independent panel will move things slightly to mean that everybody is working in the same way. Whether in the public or the private sector, we are all doing inspections; we are all doing the same things. This will get rid of that commercial pressure from both sides. I do not think that commercialism should equal no private sector building control. I do not think that that should be the case. I do not think that we have enough building inspectors not to have private sector building control. The rules need to be the same going forward.

Lord Teverson: I want to move on quickly to ask Darren whether we should put his members out of business.

Darren Ettles: I would prefer it if you did not. I run a company; I have no commercial pressures put on me in the slightest by anybody. We are in an industry where the problem is in getting good-quality, competent surveyors. That is the issue. Getting work is not really a major problem. We can get good clients.

Lord Teverson: So you do not think that this is a problem? If you look at the audit industry, there are some big bedfellows. In the past, people have had problems where big companies have compliant auditors because they rely on each other financially. Is that not the case—maybe not with your members, but with some others in the sector?

Darren Ettles: There are always bad players, but I do not have any evidence of that occurring. I point out that we do have audit processes, previously from CICAIR and now from the BSR, which specifically looks at

this. If anybody is found to have had a conflict of interest or a commercial interest, there are processes to deal with it. I could end up with a criminal conviction if I allowed that to happen in my company. There is no situation where I would allow commercial interest to influence compliance.

Lord Teverson: I was not implying that you would.

Darren Ettles: No, but I am representing the industry. People like me who are members would not allow that to occur.

The Chair: We have one final question from Baroness Drake, who is online. We will then be able to move on to our other witnesses.

Q96 **Baroness Drake:** I had two questions, but I will try to put them together concisely. How does the building safety regulator's work relate to the regulation of construction products, and how does the BSR co-operate with the Office for Product Safety and Standards? That is the first part of the question.

Secondly, the Government suggested that the new body being created for the building safety regulator is part of the initial steps towards creating a single construction regulator. In your view, should the BSR form part of a single construction regulator? What might this imply for the regulation of construction products?

The Chair: Be concise if you can.

Lorna Stimpson: I will be very concise. I agree; I am sure that the gentlemen behind me will give more information about that soon. I think that, as I said earlier, having policy intent with operationalisation closer together will be a good thing. On construction products, we work closely with OPSS already; I would like to see more of that going forward. So, yes, it would appear to be an appropriate way forward.

Darren Ettles: I completely agree. Moving the fire authority from the Home Office into this organisation, and having the testing and everything in one place, has to make sense.

The Chair: That leads into our next session. I thank you both very much for your time. As I said at the beginning, and as Lord Gilbert said, if there are any other things or extra points that you wish to make, by all means send us things in writing. Thank you very much for your time this morning. I will now close this session.