



ATLG Open Letter in Response to the Building Regulations Guidance Review

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0. Contents

1. Introduction
2. ATLG Open Letter in Response to the Building Regulations Guidance Review
3. List of Names of Endorsing Practices

1. Introduction

The significance of understanding and accurately interpreting the Approved Documents (ADs) as the primary guidance for compliance with Building Regulations cannot be overstated. As one of the primary user groups of Building Regulations guidance, it is essential that everyday practitioners are involved and consulted as part of the development, drafting, and quality of guidance. Since the Government's announcement of the Building Safety Regulator's (BSR) review of the ADs, the Architectural Technical Leads Group (ATLG) has been engaged in discussions and has now drafted a series of outline recommendations in support of the BSR's work.

About the ATLG

The ATLG is a forum for architects and other designers to discuss technical issues, share knowledge and resources, and promote improvement in the UK construction industry. The group was established following the amendments to the building regulations in 2023. With 500 members representing over 300 member practices, the ATLG includes a wide range of participants, from solo practitioners to large firms with thousands of staff, across all sectors in the UK. Since its creation, the group has provided a forum for those taking on the new dutyholder roles. Our members have developed and contributed to the RIBA Building Regulations Principal Designer Compliance Tracker, standard forms for those taking on the BRPD dutyholder role, and continued with developing consensus on challenges facing our industry.

Contact

For enquiries, please contact the ATLG board at press@atlg.uk.

Statement

The full text of the open letter is on the following pages. This will be issued to industry publications and published on the ATLG website at www.atlg.uk/#Publications.

Endorsing Practices

Please see the last page for a list of practices publicly endorsing the statement.

2. ATLG Open Letter in Response to the Building Regulations Guidance Review

The ATLG has identified six key guiding principles to consider when looking at improvements to the Approved Documents.

A. Clear, Structured and Unambiguous Introductory Guidance is Essential

The manual to the building regulations should be replaced with a new version that is updated to take account of the Building Safety Act. It should give building users, clients, designers, contractors and other Dutyholders a clear overview of the routes to compliance, including explicit acknowledgement of the status of each piece of guidance.

Any update should also provide guidance to clients on the necessity for establishing clear and unambiguous objectives with regard to duties, appointments and competencies, building safety, security, inclusivity, environmental performance and sustainability.

B. Clear Routes to Compliance

Performance-based guidance has an important part to play in providing guidance which will allow designs to meet the relevant requirements. However, performance-based guidance needs to be carefully considered to drive the right outcome.

The structure of ADs guidance could continue to follow and expand upon the structure already found in some of the guidance: a prescriptive 'deemed to satisfy' approach combined with a more sophisticated performance-based approach. Complex projects, or projects not able to follow the prescriptive approach would follow the performance-based approach.

ADs should recognise and make clear the status of referenced documents that form guidance.

ADs should clearly specify the buildings they apply to in greater detail than hitherto provided, ensuring consistency in the scope definition across each section with a 'key' to Schedule One compliance.

Guidance should be organised in such a way that it can reliably be used to demonstrate compliance with requirements. There will always be limitations to the applicability of guidance. Those limitations should be clearly explained.

C. The Government Should Lead on Building Standards, Research, and Testing.

The ADs rely on a myriad of uncoordinated third-party publications and standards, including those from commercial companies, trade associations, international bodies, and quangos. Currently, it is unclear how these are mapped and managed and coordinated. Standards upon which the ADs rely are updated slowly, inconsistently, and out of step with the ADs. This approach is fragmented and leads to

poor outcomes. The framework for compliance, and all its essential supporting parts, should be coordinated by the Government.

The provision of evidence to demonstrate performance in the form of testing, particularly fire performance, is a requirement of the ADs. As the government moves towards adopting European Norm (EN) standards, the limitations of these standards are becoming more apparent. The field of application and extended application parameters within standards are too limited to demonstrate compliance with real-world situations. There needs to be comprehensive guidance on the right approach to take at interfaces between systems and better guidance for carrying out assessments using EN standards.

D. Management and Monitoring of Stop-Gap Measures

Where testing and/or guidance gap related problems come to light, the government should be ready to provide temporary acceptable solutions pending further research. These could be formally issued as 'Government Decisions'. These would only be provided following submissions of consensus from recognised bodies such as the RIBA, for example.

E. Information Relating to Safety Should be Made Public

The ADs rely on British Standards (BS) as a means to demonstrate compliance with the Building Regulations. Standards that are critical to safety should be available to all (laypeople, building occupants, and all designers) free of charge, so all stakeholders can understand whether buildings meet safety critical standards.

F. The Approved Documents Should be Clear, Uniform, Addressable, and Trackable

Each AD should provide a clear roadmap of the routes from regulation to compliant design:

- a) Each AD should follow a standard format and each relevant clause in the approved document should be addressable and trackable, perhaps in a similar format to UK legislation. Each should clearly define to which buildings they apply or are 'in scope' within the approved documents.
- b) There should be open consultation on the final version of proposed amendments. The aim of this would be to avoid confusion/ambiguity/errors.
- c) New versions of ADs should be issued with 'track changes', and new versions of ADs should never be issued as incomplete amendments listing only changes. Example: The initial Part B 2025, 2026 and 2029 amendments were confusing and impractical requiring users to 'build their

own' compiled documents (it is noted that a new version highlighting the modifications has been issued).

- d) Issuing corrections or clarifications in Frequently Asked Questions (FAQ) documents may not be very effective, as not everyone will be aware of them and their status as guidance is not clear. It would be much more beneficial to update the main documents clearly or add guidance notes.
- e) Illogical locations for information should be avoided.
Example: finger trapping guidance in AD O rather than AD K.
- f) Vague unsubstantiated guidance should be avoided.
Example: 'Reasonable' provision of single-sex toilets in AD T.
- g) Out-of-date/withdrawn standards should be updated.
Example: AD C BRE IP 17/01 superseded by IP 1/06 but the AD was not updated.
- h) Impractical/nonsensical requirements and guidance should be rewritten:
Example: According to AD K, point 10.1 (a) all doors should have vision panels.
- i) The language used should be consistent throughout the ADs.
Example: 'Dwelling' is applied differently in AD K and AD L.

3. List of Endorsing Practices

The practices below publicly endorse the statement and support the publication of the open letter.

3DReid	Jestico + Whiles
AHMM	JTP LLP
Allies and Morrison	Lawray architects
Assael Architecture	Leonard Design LTD
Associated Architects	Levitt Bernstein
Barr Gazetas	Lifschutz Davidson Sandilands
BDP (Building Design Partnership)	LSI Architects
Blake Hopkinson Architecture + Design Ltd	Morris+Company
Bond Bryan	MortonScarr
Broadway Malyan	MSMR Architects
Buckley Gray Yeoman	Nash Baker Architects
Chapman Taylor	Osel Architecture Ltd.
Child Graddon Lewis	Paddock Johnson
Cousins & Cousins	Piercy&Company
Cowen + Partners	Pollard Thomas Edwards
Create It Studio Architects	RM Architects Ltd (RM_A)
Cunniff Design Ltd	shedkm
ECD Architects	Slab Design Union Architects
ECE Architecture Ltd	Sonnemann Toon
Falconer Chester Hall Architects	SpecStudio
FBM Architects	Spratley & Partners
Floyd Slaski Architects Ltd	Stanton Williams
GAA Design	Stiller Projects
Gallus Studio	Studio Partington
Goldline Architectural Limited	Studio PDP
GRID Architects	Supervene Architects
Hawkins\Brown	Threefold Architects
HKS Architects Ltd.	urban mesh design ltd
HLM Architects	Weedon Architects
Howells	White Ink Architects
IID Architects	White Red Architects
JDW Architects	WW+P Architects