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Building

Evaluating gateway 3 as a critical control point in building safety compliance

BUILDING the FUTURE THINK TANK

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Methodology

This research, conducted by Building in conjunction with Fenwick Elliott, was carried out via group and individual interviews with experts in the field from across the sector to provide the answers to a selection of qualitative questions. The research was undertaken between spring and autumn of 2026. Interviews were conducted by Building head of events content Jordan Marshall, who also produced the report.

Acknowledgments

With thanks to all the architects, consultants, contractors and clients who contributed their opinions to the Building the Future Think Tank, and with particular thanks to our partner Fenwick Elliott and its partners Simon Tolson, Ben Smith and David Bebb.

The feedback gathered through interviews and surveys contributed to the conclusions and recommendations in this report. However, the views expressed in this report are those of the Building the Future Think Tank, and participants cannot be assumed to have endorsed the final findings.

After the success of the Building the Future Commission in 2023, Building established its own editorial research hub, known as the Building the Future Think Tank, dedicated to producing more in-depth research and reports on behalf of the industry.

This think tank's programme has produced reports on topics including immigration, net zero, building safety and workplace and people.

Introduction: From approval to assurance

The introduction of the building safety regime has changed where and when risk is confronted on higher-risk building projects. Gateway 2 is the point at which designs must be sufficiently developed to demonstrate compliance before construction can begin. Gateway 3 represents a different test: whether the building that has actually been constructed can be demonstrated to comply with the approved design and building regulations before it can be occupied.

As the sector gains more experience of gateway 2, attention is moving towards what happens at the other end of the process. There is still a relatively small body of experience from which to judge gateway 3, but this year's Building the Future Think Tank discussions indicate that it could become an equally significant control point, with potentially greater commercial consequences because it sits immediately before occupation.

A delay at gateway 2 can prevent a project from starting. A delay at gateway 3 can leave a completed or substantially completed building unable to be occupied while the developer continues to carry financing, maintenance and management costs. The building may be physically finished, but its intended use cannot begin.

> Gateway 3 was viewed as not simply an administrative conclusion but a point at which the quality of the entire project's approach to safety compliance is tested

Effectiveness depends on earlier actions

Gateway 3 was therefore viewed, among our research participants, as not simply an administrative conclusion but a point at which the quality of the entire project's approach to safety compliance is tested. Its effectiveness will depend on what has happened much earlier: how the design was developed, how information was captured, how procurement decisions were made, how changes were controlled and how responsibility for demonstrating compliance was managed throughout construction.

This shifts the question from whether teams can assemble a gateway 3 submission at the end of a project to whether they have been creating the evidence required for it throughout the project.

Earlier Building the Future Think Tank and Building roundtable discussions had highlighted disruption and uncertainty created by the new building safety regime, including the documentation burden at gateway 2 and the impact of front-loading design and compliance work. The current discussion moves the debate on: the focus is on ensuring that what has been approved is what gets built, that changes are controlled and that the evidence needed to demonstrate these outcomes is available at gateway 3.

For developers, contractors, consultants and the supply chain, that means treating gateway 3 as something which starts at the beginning of a project rather than at its end.

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Section 1: From documentation to delivery – evidence quality and regulatory outcomes

The fundamental purpose of gateway 3 is to provide assurance that a higher-risk building has been constructed in accordance with the approved design and meets the relevant building regulations before occupation.

In practice, demonstrating that outcome is considerably more complicated than producing final drawings. Discussions within roundtables and think tank research repeatedly returned to the relationship between what is designed, what is approved and what is eventually constructed. The design approved at gateway 2 should provide the baseline. Construction should then follow that design, subject to properly managed changes, while the project team maintain evidence of what is happening.

The difficulty is that construction rarely proceeds without change. Materials become unavailable, products are substituted, details are refined, interfaces between trades have to be resolved and programme pressures can lead teams to revisit sequencing. Under the building safety regime, the question is not simply whether a change is technically acceptable or commercially sensible. The project must also understand what it means for the building's compliance position and whether it needs to be reflected in the regulatory record.

This makes the quality of evidence critical.

A well-managed golden thread should make gateway 3 less of a documentation exercise, because the necessary evidence will have been generated progressively. Rather than reconstructing the history of a building at the end, project teams can demonstrate how decisions were made and how the completed building relates to the approved design.

Structured and connected information

That requires more than a large digital repository. Information needs to be structured, maintained and connected to project decision-making. A system containing thousands of drawings and documents is of limited value if the team cannot establish which information represents the current position, what changed, why it changed and whether the change affected compliance.

The current discussion therefore places emphasis on mapping the "golden thread" of building information through the project programme, identifying in advance where particular information and approvals will be required – rather than waiting until practical completion to discover that evidence is missing.

This also changes the meaning of completion.

Under a traditional project process, practical completion can be understood primarily as a physical milestone. Under the building safety regime, the project needs to demonstrate something more: that the building as constructed can be evidenced as compliant.

The distinction becomes particularly important at gateway 3 because physical completion does not automatically mean occupation can begin. If approval is delayed, the completed building can remain unoccupied even though it still requires maintenance, inspection, testing, security and management. The financial consequences can therefore continue after much of the construction expenditure has already been incurred.

> “A well-managed golden thread should make gateway 3 less of a documentation exercise because the necessary evidence will have been generated progressively

Quality of evidence

The quality of evidence is consequently a commercial issue as well as a regulatory one. A weak information trail can create uncertainty at precisely the point when the developer needs certainty about occupation and revenue. Conversely, a project that has maintained clear evidence throughout construction should be in a stronger position to demonstrate compliance without having to recreate decisions retrospectively.

Gateway 2 and gateway 3 also place different demands on the project team. Gateway 2 is fundamentally concerned with whether the proposed building can safely proceed to construction. Gateway 3 is concerned with the building that has actually been constructed. The latter therefore depends on the quality of delivery and the ability to demonstrate it.

That creates a particular responsibility for contractors and the wider supply chain. The construction team need to understand not just what they are building but what evidence will subsequently be required to demonstrate they have built it correctly. This has implications for inspection and testing, product information, installation records, commissioning information and the recording of changes. People making decisions on site also need to understand when a seemingly minor change could have a wider building safety implication.

If a project team only begin thinking about gateway 3 when the building is approaching completion, it is already too late to manage the process effectively. The evidence required at that stage will largely concern decisions and actions taken months or years earlier.

The same principle applies to the golden thread itself. Digital information management should not become a compliance archive disconnected from construction. Design, construction and as-built information need to be connected, explaining the journey from the original approved solution to the completed building.

A change should not simply disappear into a revised drawing. There needs to be a traceable record of what changed, why it changed, who assessed it and how its compliance implications were considered. The objective is not to prevent reasonable construction changes, but to ensure that decisions do not become invisible to the regulatory process.

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Consistency of information

This is also where consistency in regulatory expectations becomes important. Earlier Building research identified concerns about inconsistent expectations around gateway 2 submissions and the burden of determining what level of information is required. The current discussion suggests that the same principle matters at gateway 3. If teams understand what evidence will be required, they can plan for it. If requirements remain uncertain until late in the process, the risk of delay increases.

The discussion did not suggest gateway 3 should become easier to pass by reducing scrutiny. Instead, the aim should be to make scrutiny more effective by ensuring that evidence is generated as part of normal project activity. A smoother gateway 3 process should not mean a less rigorous one. It should mean a process in which the regulator receives a coherent account of what was approved, what was built and how differences were controlled.

If a project can demonstrate a clear chain of evidence, gateway 3 can become the point at which that evidence is verified rather than the point at which it is created.

Section 2: Change control and the golden thread – bridging construction and completion

If evidence is the foundation of gateway 3, then change control is the mechanism that protects its integrity.

It is clear that change should be expected on construction projects. The regulatory challenge is not to eliminate change but to ensure that it is controlled in a way that preserves the building's compliance position.

The golden thread is therefore not simply an information technology issue. Digital systems can store and retrieve information, but they cannot by themselves determine whether a change is significant, whether it affects compliance or whether the appropriate people have considered it. That remains a project management responsibility.

Linking golden thread requirements to project milestones means information is captured as work progresses rather than being left until the end. This turns compliance information into part of the construction programme and creates a direct connection between design and delivery.

Gateway 2 provides the baseline

The building approved at gateway 2 establishes a defined baseline. As construction proceeds, the team should be able to show that the building remains aligned with that baseline or explain and evidence any departures from it.

This becomes particularly important where procurement and construction decisions are made after gateway 2. The new building safety regime has increased the amount of design work required before construction begins. Industry comments supplied to the think tank noted that the requirement for a much more detailed design at gateway 2 makes procurement more challenging, particularly under design and build

> The regulatory challenge is not to eliminate change but to ensure that it is controlled in a way that preserves the building's compliance position

arrangements. Clients and their teams therefore have to commit to more of the building earlier than they traditionally might have done.

That front-loading can have a positive consequence for gateway 3. Greater design certainty before construction can reduce ambiguity later and may limit opportunities for major design changes during construction. But the benefit depends on maintaining that certainty.

A project can still be changed after gateway 2. A substitution that might previously have been treated as an ordinary procurement decision may now need to be assessed against the approved building and regulatory requirements.

Early supply chain involvement

That creates an incentive for project teams to involve the supply chain earlier. Manufacturers, specialist subcontractors and other suppliers need to understand requirements and commit resources in good time, particularly where a product or specialist installation is critical to the building's safety strategy.

If a specified product becomes unavailable several months into the project, the team may not simply be able to substitute an equivalent without further assessment. A change can affect documentation, performance evidence, interfaces and potentially the regulatory position. A seemingly small procurement problem can thus become a much larger programme problem.

The current discussion also suggests that this can make value engineering more difficult after gateway 2. The ability to identify savings by changing products or details is constrained if the change requires further regulatory consideration. A modest saving can be outweighed by the cost of waiting for assessment of the revised solution.

That reinforces the importance of early engagement and good information. Project teams need to identify as early as possible which elements are likely to create regulatory risk. There is a case for clearer mechanisms through which teams can test bounded technical questions and understand how evidence will be assessed, without compromising the regulator's independence.

The discussion compared this concept with planning pre-application processes. A similar approach for building safety could help identify potential issues before they become late-stage programme problems.

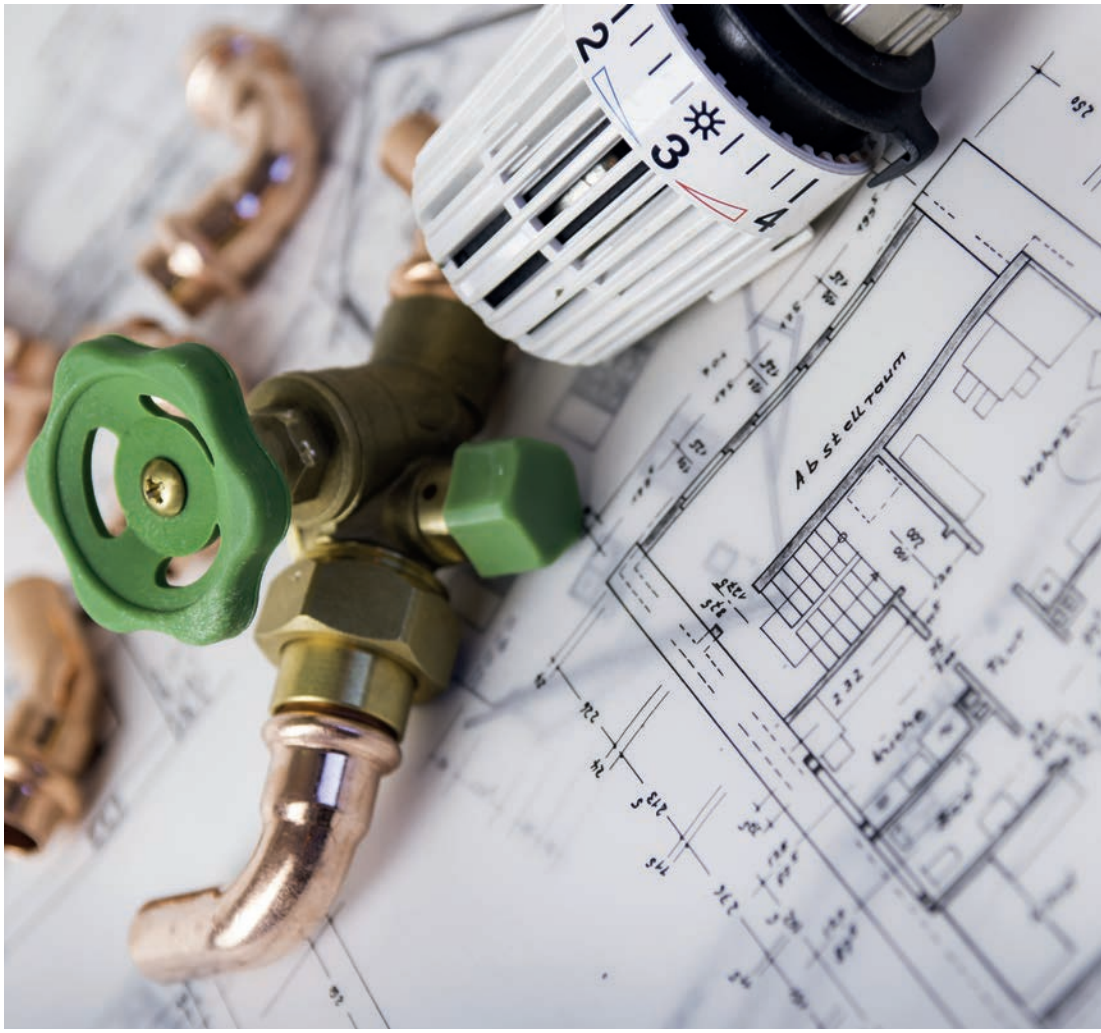
The value would be predictability. A design team can develop its submission around the evidence expected, a contractor can procure and construct against the compliance basis, and a developer can make more informed commercial decisions.

> “ Suppliers need to understand requirements and commit resources in good time, particularly where a product or specialist installation is critical to the building's safety strategy

The need for consistency has also been a recurring theme in think tank and roundtable discussions. Participants referred to variation in the level of information requested and differences in regulatory feedback, including in areas such as mechanical and electrical design. That uncertainty can encourage teams to submit more information than may ultimately be necessary, because they do not want to discover later that something was missing.

The objective should instead be a clear, proportionate and predictable evidential framework.

The strongest golden thread is not the largest document set. It is the clearest account of the building. It should allow a reviewer to understand the approved design, follow the decisions taken during construction and see how the finished building relates to the original compliance position.



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Section 3: Commercial and programme risk implications

The commercial significance of gateway 3 is potentially greater than its position in the project sequence might suggest.

Because it sits immediately before occupation, a delay can affect the point at which a building begins to generate its intended income. For a residential scheme, this can mean delayed sales or rental income. At the same time, finance, security, insurance, maintenance and management costs continue. Gateway 3 can thus act as a potential hold point on revenue.

This creates a different risk profile from gateway 2. At gateway 2, the project has not yet moved into full construction. At gateway 3, significant capital may already have been spent and the building may be substantially complete.

That makes programme planning particularly important. Gateway 3 should not be treated as something that happens automatically once physical works are finished. It needs to be incorporated into the programme alongside commissioning, testing, documentation and building management mobilisation.

Discussions indicate that the industry is still working through how responsibilities should be allocated between client, contractor and consultant teams. Main contractors may assist clients through regulatory processes, but there is a reluctance to guarantee the regulator's approval or the time it will take to be obtained, because contractors do not control the regulator's decision-making process.

The result is an asymmetry of risk. A client may want certainty that a project will pass through the gateway within a particular timeframe. A contractor can control its own performance but cannot control the regulator's

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response. Contracts therefore need to distinguish between risks a contractor can reasonably manage and risks outside its control.

The commercial implications of a gateway 3 delay can be particularly acute, because there is less opportunity to absorb it elsewhere in the programme once the building is complete.

Projects therefore need realistic programme allowances for the gateway itself, as well as time to identify and resolve evidence gaps. The risk of finishing the physical building first and dealing with the compliance record afterwards is that the project may have to locate information from subcontractors who have moved on, reconstruct decisions or revisit installations.

This is why the commercial case for starting gateway 3 preparation from the outset is stronger than it might initially appear. It is not simply about reducing administrative pressure. It is about protecting programme certainty and reducing the probability that the project reaches physical completion without being able to demonstrate that it is ready for occupation.

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Front-loaded expenditure and funding

The financial pressures also extend into procurement and project funding.

Written comments supplied to the think tank highlighted the possibility that the new regime will require developers to commit more funding earlier in the project. Detailed design has to be developed before gateway 2, meaning that significant design and compliance expenditure can occur before construction and before the developer begins to see the physical progress against which lenders traditionally release funding.

Designers, consultants and contractors may all need to undertake more work earlier, while traditional payment and funding structures have not necessarily changed at the same pace. Pre-construction services agreements can provide a mechanism for bringing contractors into the process earlier, but these arrangements do not always reflect the true cost of the work required.

The implication is not necessarily that every project needs a totally different procurement model, but rather that the economic profile of higher-risk building projects has changed.

Clients need to budget for compliance activity earlier. Contractors need to understand what pre-construction work they are being asked to undertake and how it will be paid for. Designers need sufficient resource to develop and co-ordinate the level of detail required. Lenders need to understand why significant expenditure may occur before physical construction begins.

Supply-chain capacity

The supply chain creates another layer of risk.

Written comments supplied to the think tank highlighted concern that once approvals begin to accelerate, demand could become concentrated around the same products, specialist subcontractors and skilled labour. If a large number of delayed schemes move forward at the same time, capacity could become constrained.

Faster regulatory approvals are necessary to release projects, but a rapid release of projects can itself create capacity pressures. The consequences could include inflation in the cost of materials and labour, longer lead times and difficulty securing specialist subcontractors.

This reinforces the value of early procurement planning and supply-chain engagement, particularly where gateway 2 approval establishes a detailed design dependent on specialist products or capabilities.

Again, the issue returns to change control. A procurement problem can become a regulatory problem if the alternative solution differs from what was approved. A regulatory problem can then become a programme problem if the alternative needs additional assessment, and a programme problem can become a financing problem if the resulting delay pushes back occupation.

The risks are therefore connected rather than discrete. Building safety needs to be considered as a whole-project commercial issue rather than as something delegated solely to compliance specialists.

Design and development strategy

There was also discussion of developers reconsidering whether to pursue higher-risk buildings where regulatory and programme uncertainty makes the commercial proposition

difficult to sustain. In some cases, residential or student schemes may be redesigned to remain below higher-risk building thresholds where the site allows, for example through changes to building height and form.

Existing buildings and conversion

Gateway processes can also create challenges for remediation and conversion projects. Questions can arise about whether particular works trigger gateway requirements, while existing buildings can present additional complexity because the project team must establish what is already there before determining what needs to be changed.

Older buildings can contain constraints around lifts, fire-fighting arrangements, secondary power supplies and grid capacity. A conversion therefore cannot necessarily be approached in the same way as a new-build scheme.

This increases the importance of early investigation. A project that discovers fundamental constraints late in the process is more likely to face redesign, additional cost and programme delay. The golden thread in an existing building therefore needs to account for the relationship between existing conditions, proposed interventions and the final compliance position.

Occupation and regulatory capacity

The financial risk of delay at gateway 3 also changes the relationship between construction completion and occupation.

The building may have been sold or let in anticipation of a particular date. Building management teams may need to mobilise. Residents may have been given expected occupation dates. Facilities and maintenance arrangements may have been prepared. The longer a gateway 3 delay continues, the more these commercial arrangements can become disconnected from physical progress.

This is why gateway 3 needs to be integrated into the project programme rather than placed at the end of it. The regulatory process should be planned alongside commissioning, testing, documentation, building management mobilisation and the other activities required for occupation.

The broader commercial lesson is that certainty is increasingly valuable. A fully developed design at gateway 2 can provide greater certainty around construction, pricing and sequencing. A disciplined golden thread can provide greater certainty around compliance evidence. Effective change control can protect that certainty during construction. Early preparation for gateway 3 can reduce the risk that an otherwise complete building is unable to move into occupation.

> “ Early preparation for gateway 3 can reduce the risk that an otherwise complete building is unable to move into occupation

But the industry cannot solve regulatory uncertainty through project management alone. Participants highlighted the need for appropriate resourcing within the Building Safety Regulator, experienced staff and consistent approaches to assessment. If the system is under-resourced as demand increases, improvements within individual projects may not be enough to prevent delays.

The sector is therefore dealing with two linked challenges: project teams need to become better at preparing for gateway 3, while the regulatory system needs to provide sufficient clarity and capacity for that preparation to translate into timely decisions.

Recommendations

The central finding from think tank research and roundtables is that gateway 3 should be understood as the culmination of the building safety process, not its final administrative stage.

If the project has a clearly defined compliance basis from gateway 2, has maintained a robust golden thread of information, has controlled changes properly and collected evidence as construction progressed, gateway 3 should provide an opportunity to verify that the building delivered is the building that was approved. If those processes have not been embedded, gateway 3 risks becoming a point at which unresolved problems are discovered for the first time.

That distinction has major commercial implications. A gateway 2 delay can prevent construction from beginning. A gateway 3 delay can prevent occupation after substantial construction expenditure has been incurred, leaving completed buildings incurring ongoing costs without generating their intended income.

The evidence and discussion point towards making the process leading to gateway 3 more deliberate, consistent and predictable.

1. Start gateway 3 prep from the outset

Gateway 3 preparation should begin when the project begins. This does not mean completing the final submission years in advance. It means identifying what information will ultimately be required to demonstrate the building has been constructed in accordance with its approved design and the relevant building regulations.

The project programme should reflect this. Golden thread information, inspection and testing records, product data, commissioning evidence and records of changes should be generated and checked as work progresses.

The final gateway 3 submission will then be an organised conclusion to a process that has already taken place, rather than an exercise in reconstructing the history of the project.

2. Treat change control as a building safety process

Change control needs to sit at the centre of project delivery. The industry already has established processes for managing changes to cost, programme and design. The new regime adds to these another step: for each change, identifying what it means for building safety compliance and gathering the evidence to support this.

Project teams should therefore be able to trace significant changes from the original approved solution through assessment, decision and implementation to the final as-built record. That does not mean preventing sensible construction changes. It means ensuring that changes do not become invisible gaps in the compliance record.

3. Strengthen early procurement and supply-chain assurance

The level of design that is required before gateway 2 means that more procurement decisions are being made earlier in the project. Teams should therefore identify critical products, specialist installations and supply-chain dependencies before construction begins, particularly where alternatives could have implications for the approved design or building safety evidence.

Early engagement can help establish whether specified products and specialist capabilities are likely to remain available through construction. It can also reduce the risk that a late substitution creates a regulatory issue that then becomes a programme or financing problem.

The objective should be to identify potential supply-chain risks early enough for project teams to respond without compromising the approved design or creating avoidable pressure at gateway 3.

4. Build the golden thread around the project programme

The golden thread should be linked to the programme rather than treated as a separate information-management exercise.

Identifying in advance when particular information will be generated and when it needs to be checked can prevent the end-of-project scramble to collect documents, obtain signatures and establish what happened during the construction period.

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