

Alex Norris MP
Parliamentary Under-Secretary of State (Building Safety, Fire and Local Growth)
Ministry for Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

Sir Chris Bryant MP
Minister of State for Data Protection and Telecoms
Department for Science, Innovation and Technology
100 Parliament Street
London
SW1A 2BQ

Dear Ministers,

Re: urgent action required on Higher-Risk Building Regulations for digital connectivity

Further to our previous correspondence (dated 22nd May) we are writing to update you on the ever-growing impact that that Building (Higher-Risk Buildings Procedures) (England) Regulations 2023 (HRB Regulations) are having on the telecoms sector and our customers across the country, and to highlight that this issue requires urgent and decisive action from your departments.

Since we last wrote to you, more and more members have raised the impact of the HRB Regulations and we expect the issue to significantly worsen in coming weeks and months.

At present, our members have effectively placed rollout to HRBs on hold, in anticipation of a fast-acting policy solution. However, this is not a sustainable solution, and operators across the telecoms sector will soon be forced to bring applications to the Building Safety Regulator (BSR) or to delay or even abandon full fibre broadband rollout to HRBs entirely. With current approval times already reported to fall between 6 and 12 months, the anticipated surge in applications from our members will paralyse the BSR, severely exacerbating the existing backlog and causing critical delays across all sectors subject to BSR approval, including housing.

We appreciated the opportunity to have initial conversations at working level with your departments, but we remain concerned about the scale and knock-on impacts that the HRB Regulations are having on both individual providers and the government's overall policy targets for full fibre broadband rollout and growth agenda. Urgent action is needed on this issue.

Without urgent policy intervention, we will witness the following:

- **Immediate consumer impact:** Residents, including students at university, will move into properties that do not have access to full fibre broadband.
- **Rollout target and digital exclusion:** We will see an increasing number of HRBs that will not have access to future-proof digital connectivity. Current and future residents will thus be

digitally excluded which runs counter to the Government's digital inclusion agenda. Without further intervention the UK will not be able to hit the target of achieving nationwide coverage.

- **Undermining of competition:** Long approval times will make it effectively impossible for consumers to switch across network providers, undermining government policy to support a dynamic and competitive market.
- **Lower market and investor confidence:** The broadband sector is facing severe economic headwinds and is in a process of consolidation. Without urgent intervention, the current situation risks affecting the valuations of providers with a strong HRB footprint, undermining established investment cases and investor confidence, and risk HRBs effectively becoming stranded assets.

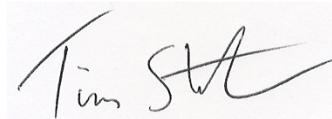
The telecoms sector will be affected by the HRB Regulations across both new build and old housing stock. The impact of the Regulations is already being felt by residents, and the number of impacted people will start to rise significantly in the very near future.

We maintain that the policy options that we set out in our previous letter remain valid, and urge you to instruct your departments to work with us at pace to find a solution that ensures that we can continue to connect residents in HRBs to future-proof connectivity.

Yours sincerely,



Steve Leighton
Chair of the ISPA Council



Tim Stranack
Chair of INCA