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The challenge and opportunity of 15-year structural warranty

SURVEY REVEALS INDUSTRY'S CAUTIOUS OPTIMISM OVER NEW WARRANTY REGS

PRODUCT MANUFACTURERS FACE UNCERTAINTY OVER NEW TESTING REGIMES

CAN HOUSEBUILDERS AND DEVELOPERS HOPE FOR BENEFITS AS WELL AS COSTS?



OPTIMISM AMID UNCERTAINTY

Experts and industry react to potential 15-year warranties

The Building Safety Act, introduced in April 2022, brings generational change to the UK's construction industry. It introduces new regulations, enforcement mechanisms, regulatory bodies and enhanced powers for these regulators.

Significantly, it also includes provisions that could make structural warranties legally mandatory, and mandate that those warranties are a minimum of 15 years.

This would be the first time that structural warranties would be mandated by law, and the 15-year minimum is a five-year extension over the typical length of warranty currently issued. At the same time, the effective retroactive liability period of the Defective Premises Act will be extended to 30 years.

While these changes, and proposed changes, have not been covered in the same depth as other

The majority of those in the housing industry are unaware of the potential for minimum 15-year structural warranties to be introduced by law

changes brought in by the Building Safety Act, they have the potential to carry significant effects for the housing industry.

Building magazine, working in partnership with LABC Warranty, asked the housebuilding industry itself and a panel of industry experts to shed light on how they feel about the proposed changes, and how these might impact the sector.

Homebuilders react

An LABC Warranty survey has found that while the majority of those in the housing industry are unaware of the potential for minimum 15-year structural warranties to be introduced by law, they are optimistic about the effects of that change.

Gathering 270 responses from their audience of homebuilders, developers, social housing providers, contractors, self-builders and more, the survey indicated that while the sector was largely unaware of the possibility of minimum 15-year structural warranties, they were cautiously optimistic about their introduction.

In particular, the positive aspects focus on how the changes could increase the standards of new homes, and increase the confidence that residents have in

This cautious optimism comes with concerns about how the changes could affect a sector already struggling with inflation, labour shortages and economic uncertainty

their new-build homes.

However, this cautious optimism comes with a number of concerns about how the changes could affect a sector already struggling with inflation, labour shortages, economic uncertainty, and other cost-related issues.

Experts weigh in

Some of the concerns and uncertainties are shared by experts from the manufacturing, regulatory, legal and consulting fields.

They included respondents from Local Authority Building Control, quality experts from Hill, Calfordseaden, Watson Farley & Williams, and the Construction Products Association.

Speaking to Building magazine

in their capacity as experts in their respective fields, they shared their opinions on how the changes would affect the housebuilding industry.

Some of the potential negative and positive outcomes for the change are couched in the knowledge that there is a great deal of uncertainty around the topic right now.

One of the key concerns is cost, with one expert discussing the possibility that the increased cost would be disproportionate compared with the benefits of enhanced protection.

In fact, some experts speculate that the cost, even with the promise of enhanced protection, could drive prices high enough to price more buyers out of the market.

Of course, it's not all bad – many of the experts believed that the net outcome for residents would be an increase in standards and protections.

Explore the findings

Read on for more in-depth coverage of the results of LABC Warranty's survey, and more reflection from industry experts on how minimum 15-year warranties may affect the housebuilding industry.



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VIEWS FROM THE INDUSTRY

Revised mandatory warranty periods will undoubtedly have an impact on the sector, but what exactly do industry stakeholders expect to result from the changes? LABC Warranty carried out a survey to find out

An LABC Warranty survey has found that while the majority of those in the housing industry were unaware of the potential for minimum 15-year structural warranties within the Building Safety Act, once made aware of this change they are optimistic about its effect.

They were also optimistic about the potential introduction of mandatory structural warranties for all new-builds, a proposed change of which the majority of those surveyed were aware.

The main concern expressed by respondents was the potential cost impact on the housing sector.

The upcoming changes

Within the Building Safety Act, passed in April 2022, there is some wording specific to the structural warranty sector. For the first time, structural warranties will not only be something the mortgage industry demands, but will be mandated and outlined in law.

The survey undertaken by LABC Warranty concerned two specific areas of the BSA's wording around structural warranties.

■ The first is wording which, if

activated by secondary legislation, would mandate that the minimum term of structural warranty cover will be extended to fifteen years. Currently, most structural warranties are 10 years, with some exceptions.

■ The second is wording that, if also activated by secondary legislation, would mandate that all new homes built are covered by a structural warranty. Currently, there is no statutory requirement for structural warranties to cover a home; instead this is typically required by mortgage providers.

For the first time, structural warranties will not only be something the mortgage industry demands, but will be mandated and outlined in law

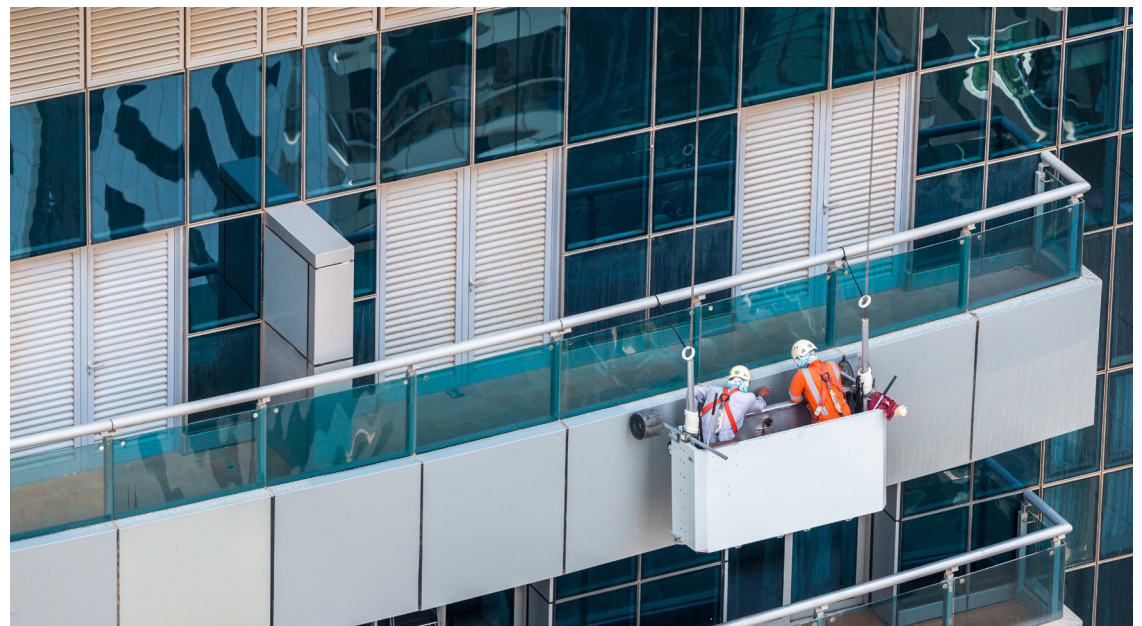
What the survey covered

This report analyses the results of a survey of LABC Warranty's customer audience. The audience offered their feedback on:

- Their awareness of the new legislation that would affect the structural warranty sector.
- Whether they believed these changes would have positive outcomes, negative outcomes, or a mixture of both.

About the respondents

In descending order of responses, LABC Warranty's audience of 270





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identified themselves as:

- 27% housebuilders or developers
- 19% architects and designers
- 19% building control professionals
- 9% consultants
- 7% contractors
- 6% self-builders
- 5% other businesses
- 4% social housing providers
- 4% homeowners

Survey responses

Question 1

Are you aware the Building Safety Act makes provision for secondary legislation to extend new home warranties from 10 years to 15 years?

- 36% of respondents said yes.
- 64% of respondents said no.

Question 2

Are you aware the Building Safety Act makes provision for secondary legislation that will make it a legal requirement for developers and builders to offer warranty cover on all new homes?

- 53% of respondents said yes.
- 47% of respondents said no.

Question 3

Do you support extending standard new home warranty cover from 10 years to 15 years?

The responses demonstrate a fear that the cost burden would polarise the building industry, further straining the small-to-medium builder section of the housing market

- 60% of respondents said yes.
- 40% of respondents said no.

Question 3 follow-up

A follow-up question asked respondents to cite their reasons for supporting, or not supporting, longer minimum warranty periods.

Of the 162 respondents who said yes and answered the follow-up question:

- 46% cited "improving standards in homebuilders".
- 41% cited "better protection for homeowners".
- 10% cited "alignment with the Defect Premises Act liability period".
- 2% cited "other".

Of the 106 respondents who said no and answered the follow-up question:

- 37% cited "too expensive to implement".
- 56% cited "there is no need for it".
- 7% cited "other".

Question 4

Have you made any preparation for the possibility of 15-year warranties being made law?

- 6% of respondents said yes.
- 94% of respondents said no.

Question 5

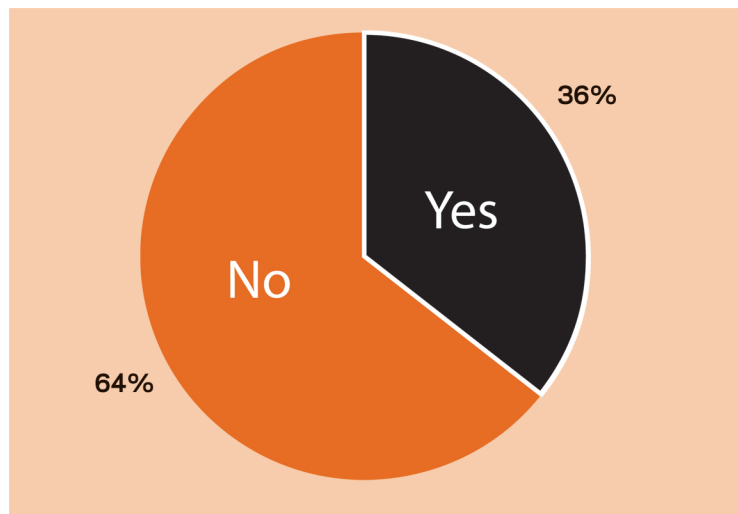
Do you think 15-year structural warranties will improve resident or owner confidence in the quality of their new-build homes?

- 59% of respondents said yes.
- 41% of respondents said no.

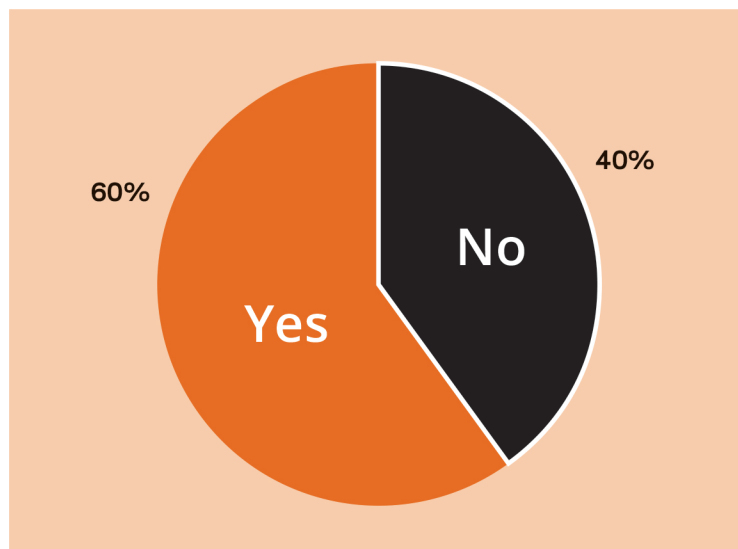
Question 6

In your opinion, will mandating structural warranty cover for all new homes affect the standards and security of new homes? This question offered a multiple

Question 1: Are you aware the Building Safety Act makes provision for secondary legislation to extend new home warranties from 10 years to 15 years?



Question 3: Do you support extending standard new home warranty cover from 10 years to 15 years?



choice with four potential answers. Overall, approximately 58% of respondents indicated a net positive outcome, with just over 35% indicating they felt there would be a net negative outcome.

Positive outcomes:

- 24% of respondents believed

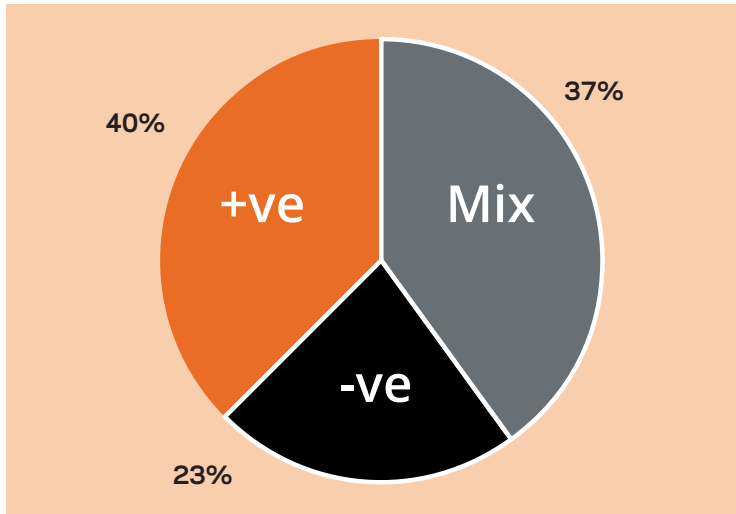
that warranties for all new homes would increase standards and safety in all new homes.

- 26% of respondents believed that warranties for all new homes would both increase standards in all new homes, and improve resident security and satisfaction in those new homes.



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Question 7: Should 15-year warranties for all new homes become law, what do you believe will be the overall outcome for the housing sector?



■ 8% of respondents believed that warranties for all new homes would improve standards, without commenting on resident or owner confidence.

Negative outcomes:

- 4% of respondents believed that warranties for all new homes would not affect resident confidence in their new homes, without commenting on security or standards.
- 17% of respondents believed that warranties for all new homes would not affect the standards or safety of new-build homes.
- 15% of respondents believed that warranties for all new homes would have no impact on either resident confidence or standards and security.

Mixed outcomes:

- 6% of respondents believed that warranties for all new homes would improve consumer confidence, but would not affect the standards of safety of those homes.

Question 7

Should 15-year warranties for all new homes become law, what do you believe will be the overall outcome for the housing sector?

- 40% of respondents said they believed there would be a positive outcome.
- 23% of respondents indicated they believed it would be a negative outcome.
- 37% of respondents believed there would be a mixture of negative and positive outcomes.

Conclusions

At a glance

Survey results indicate that while most respondents were unaware that there could be a change to 15-year minimum warranties, most respondents also believed that the change would be positive.

Additionally, a majority were aware of the wording mandating all new homes are covered by warranty regardless of whether they are built for the open market or not. A majority also welcomed

Respondents believe the most common response to longer minimum warranty periods will be to improve the standards in homebuilding, which in turn will improve resident confidence

this move, believing it would increase standards and resident confidence in their homes.

Given the strength of feeling in the anecdotal responses, where even respondents who offered a broadly positive outlook had reservations about potential negative effects of the legislative changes discussed, LABC Warranty would describe the response as a very cautious optimism (while awaiting more details on the upcoming secondary legislation).

The preparation

The secondary legislation that would activate the wording in the Building Safety Act mandating 15-year warranties and warranties on all new homes has yet to be brought forward into law.

Until the legislation is introduced, the housing industry can only use informed, educated guesses on the potential contents of that legislation, and what its eventual effects will be for the housing industry itself. As a result, very little tangible preparation has been done according to this research.

The opportunity

Respondents believe that the most effective or most common response to longer minimum

warranty periods will be to improve the standards in homebuilding, which in turn will improve resident confidence in the quality of their new homes.

This might be driven by the warranty industry demanding more robust standards up-front to protect them from currently unmonitored defects occurring after 10 years, or by developers themselves in an attempt to keep warranty premiums at a minimum.

The challenge

Naturally, this change would come at a cost. For a sector already beleaguered by increasing materials prices, economic uncertainty, inflation, and labour shortages any drive to further increase standards will likely mean increased costs.

The responses demonstrate a fear that this cost burden would polarise the building industry, further straining the small-to-medium builder section of the housing market. We also see fears that the increased costs could end up being passed to residents, driving the cost of new homes up when many would-be buyers are already struggling to buy their first property.

FULL SURVEY REPORT

For more information on the background, methodology, and full results of this survey, visit www.labcwarranty.co.uk/bsa-survey-report and download the entire report.

The full version explores more of the anecdotal responses, analyses the results by business type, and takes a closer look at the implications of this research.



TESTING

TIMES AHEAD

Product manufacturers are beset with uncertainties over the the new safety regime. Will products need to be retested for extended durability? Will the testing backlog worsen as a result? And how will regulatory changes on warranties impact a sector already undergoing major change? **Jordan Marshall** reports



The industry welcomes the improved safety the new rules will bring, but the lack of clarity on product testing regimes could affect materials availability



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In the wake of the 2017 Grenfell Tower fire there has been a sharp focus on construction product manufacturers and the regime that tests them.

Questions around the veracity of the testing system, how it was being used by product manufacturers, and what reforms are needed have been rife thanks to the shocking evidence heard by the public inquiry into the fire.

The revelations led the government to commission a landmark independent review of the assessment regime for construction products, which was published back in April.

Authored by the government's former chief construction advisor, Paul Morrell, and construction legal expert Anneliese Day KC, the 174-page report recommends a major shake-up of the way approved bodies regulate products.

And while the reforms could see new-builds have 15-year warranties, a parallel amendment to the Defective Premises Act 1972 (see panel, right) extends retrospective liability from six years to up to 30 years, allowing more homebuyers to claim compensation for defects.

Questions raised

Altogether, these changes are raising even more questions for the construction product testing and manufacturing sectors.

Will products need to be retested for extended durability? How will this impact the testing backlog that already exists? And how will the potential regulatory changes to warranties impact sectors already undergoing significant change?

For his part, Peter Caplehorn, chief executive of the Construction Products Association, the leading

EXPLAINING THE DEFECTIVE PREMISES ACT 1972

The Defective Premises Act 1972 is a UK act of parliament that covers landlords' and builders' liability for poorly constructed and poorly maintained buildings, along with any injuries that may result. The legislation applies to England and Wales, but there are similar laws in Scotland and Northern Ireland.

The act sets out two main duties:

- A duty on builders to construct dwellings properly. This means that builders must take reasonable care to ensure that the dwellings they build are safe and fit for human habitation.
- A duty on landlords to keep dwellings in repair. This means that landlords must take reasonable care to ensure that the dwellings they let are safe and fit for human habitation.

The act defines what is meant by a "relevant defect", which is a defect in the state of the premises that makes them unsafe or unfit for human habitation. This could include defects

in the structure of the building, the fixtures and fittings, or the services.

There are a number of defences that the builder or landlord may be able to raise in a claim under the Defective Premises Act 1972. These include:

- The defect was not caused by their negligence.
- The defect was not known or reasonably foreseeable by them.
- The defect has been remedied.
- The claimant contributed to their own injuries.

In addition, there are a few further points to note about the Defective Premises Act 1972. These are as follows:

- The legislation applies to dwellings, which are defined as buildings that are used or intended to be used as a place of residence.
- It only applies to defects that existed at the time the dwelling was first occupied.
- It does not apply to defects caused by the negligence of the occupier of the dwelling.

organisation that represents and champions construction product manufacturers and suppliers, welcomes the move to extend the warranty period for new homes to 15 years, saying it would "undoubtedly underpin" efforts to improve the quality and safety of construction. He says the current warranty period is not long enough, and that extended warranties would give homeowners greater peace of mind.

We have a challenge over just working through the practicalities and working through the detail, particularly as a lot of that is yet to be finalised

Peter Caplehorn, Construction Products Association

"We certainly need this kind of additional cover. I think we need to take these measures in context with all the other things that industry is moving towards doing," he says. "This direction of travel is about making sure that the quality of construction and the safety of construction are improved."

Lack of detail

Caplehorn adds that what is essential now is clarity, as there are further concerns around the lack of detail in the reform.

"I think we have a challenge over just working through the practicalities and working through the detail, particularly as a lot of that is yet to be finalised," he says. "Product manufacturers, like any other business, require certainty when planning for the future – and they will be looking to tackle this at a time when there is nothing but change afoot."

On this point his thoughts are echoed by James Green, partner at Calfordseaden, who says the lack of detail around changes will cause challenges for those specifying the products as well.

"Contractors will be trying to procure and confirm products and details in order to navigate through the whole Building Safety Act gateway approval process. And if you are already struggling to find products, and they get withdrawn you have to go somewhere else – what is the impact?" Green states. "If an approved product gets withdrawn over warranty concerns, the approval process would have to be repeated potentially causing a delay to the project."

Caplehorn is also concerned about how the current lack of clarity on the requirements around warranties could impact research and development in the sector – something that can be



» ill-afforded at a time when new solutions are badly needed.

Caplehorn says: "Products need to be developed and researched, and there needs to be clarity for R&D. You will get failure in the R&D arena but need to be able to accurately judge what the benchmark for failure is.

"We need it to be so that the direction of travel is that there is confidence as products are brought to market. At the moment the specifics for the appropriate level of certainty aren't there."

Implementation challenges

Caplehorn also warns there will be challenges in implementing the new rules, particularly around record keeping and product testing. However, he says the industry was already moving towards greater transparency and clarity on product testing, and points to the launch of the Code for Construction Product Information, which aims to ensure that product information is clear, verified and audited.

He says government must be cognisant of the limited capacity the testing market has. "We have got to bear in mind that when we were in Europe we had access to around 700 testing and certification organisations, and

Warranty providers already stipulate that products performing a critical function within the home must have a design life of 60 years



we have now got around 40 – and not all of those cover construction products," Caplehorn explains. "So we have got a significantly smaller testing arena."

He says the resolution to that largely hinges on whether the UK will in the future have access to testing facilities outside of the UK. "For me, the logical answer to that is yes. But it is more a political question than it is a practical technical question," he concedes.

However, Andy Mullins, head of quality at housebuilder Hill, says he feels that the impact of the reform on product testing will be minimal.

He says: "The main warranty providers stipulate that products

I don't think we can wholesale just apply today's regulations backwards in time – that wouldn't be achievable

Andy Mullins, Hill

that perform a critical function within the home should have a design life of 60 years. This requirement is already embedded in their standards, and they all have third-party accreditation. That is for the key products.

"When you consider a lifespan of 10 to 15 years, you are primarily dealing with ongoing maintenance, rather than the quality of the original installation. While there have been some issues with the testing process, it appears that the government is attempting to address something that hasn't been clearly identified as a problem, particularly from the perspective of extended warranties."

For his part, Caplehorn also says that the government needs

to be careful about how it applies the regulations retrospectively, as this has the potential to "cripple" the industry. He says a considered approach is needed to allow for buildings that were constructed to older standards.

"Having said that, we have got to have buildings that are safe, and people have got to feel safe. That's been the driving principle that we've been using.

"We have to have methodologies that will allow consideration of buildings. We've seen it with mould; we've seen it with fire, and some with structural issues. But I don't think we can wholesale just apply today's regulations backwards in time – that wouldn't be achievable."

The full effect of the proposed changes cannot be known until they are implemented. It is clear they will have an impact on the construction products manufacturing and testing industry – but how significantly will that be felt?

The Department for Levelling Up, Housing and Communities did not respond to requests for comment.





DEVELOPING A SENSE OF TRUST

For housebuilders and developers, the mandating of increased warranties could drive up costs. But if they respond with an improved focus on quality, there will be benefits in the form of enhanced reputations and greater trust from homebuyers. **Jordan Marshall** reports

It is undeniably a difficult environment in which to be building new homes in the UK.

A cost-of-living crisis and raised interest rates are dampening buyer appetite, while high levels of inflation are causing economic challenges for developers and contractors alike.

Add to that the difficulties of the current planning system and the huge regulatory shift that will come with next month's full implementation of the Building Safety Act, and there is no shortage of hurdles to scheme viability.

So when considering the potential extension of new home warranty periods and the introduction of mandatory warranties for all new-build homes, it is imperative to take into account this already difficult-to-navigate landscape. Will the impact of the changes be for better or for worse?

For her part, Lorna Stimpson, chief executive of LABC, says it is clear that the new regime will affect costs for developers and homebuyers alike – potentially influencing the viability of schemes.



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» “If [the changes are] going to increase [the warranty period] to 15 years, and the developer liability period increases from two years, that’s going to impact on costs for the homeowner but also costs for the developer. I think it’s going to be quite a balancing act to get right,” Stimpson says.

But Martin Taylor, executive director of LABC, says there are still plenty of benefits that will be felt by consumers, meaning the new warranty regulations should not have a significant impact on homebuyer appetite.

“A freehold purchaser or a leaseholder with a lease of more than 21 years will now benefit from a new home warranty, and there is also a requirement that if common parts of buildings have been converted into dwellings they will also receive the same sort of protection,” he says. “So, as I understand things, there are benefits all round, as far as we’re concerned.”

Martin continues: “There will be minimum parameters and standards which need to be included in the warranty and the ability for the warranty to transfer that protection should the ownership of the house change. So again, a win-win from a consumer protection point of view.”

However, Taylor is not saying there will be no impact on project

It’s the developer that could face challenges here with potential monetary penalties of up to £10,000 or 10% of the house purchase price

Martin Taylor, LABC

EXTENDED WARRANTIES: POTENTIAL PROS AND CONS AT A GLANCE

Challenges

■ **Increased costs:** Extended warranties will increase the cost of new homes, as developers and builders will need to factor in the cost of insurance and repairs. This could make it more difficult for some people to afford to buy a new home.

■ **Lengthier construction times:** Developers and builders will need to ensure they have the necessary documentation and records to support extended warranties, which could add time and complexity to the construction process. This could lead to delays in the delivery of new homes.

■ **Increased risk:** Extended warranties will increase the risk for developers and builders, as they will be liable for defects for a longer period. This could lead to financial losses if there are many warranty claims.

■ **Competition:** The increased cost of new homes could lead to decreased demand, as some people may choose to buy older homes instead. This could make it more difficult for developers and builders to compete with other types of housing.

■ **Regulatory uncertainty:** The details of the new warranty requirements are still being finalised, which could create uncertainty for developers and builders. This could make it difficult to plan and budget for new projects.

Opportunities

■ **Improved quality:** Extended warranties can help to improve the quality of new homes by giving developers and builders an incentive to build high-quality homes that will last. This could lead to increased demand for new homes, as people will be more confident that their homes will be free of defects.

■ **Increased peace of mind:** Extended warranties can give homeowners peace of mind in being able to know that their homes are covered for defects for a longer period of time. This could lead to increased satisfaction and loyalty among homeowners, which could bring benefits for developers and builders in the long run.

■ **Improved reputation:** Extended warranties could help to improve the reputation of the construction industry. By demonstrating a commitment to high quality and customer satisfaction, extended warranties could help to attract new customers and boost sales.

■ **Greater transparency:** The new warranty requirements will require developers and builders to be more transparent about the materials and workmanship used in their homes. This could help to build trust and confidence among homeowners.

viability as a result of the new home warranty reform. “It’s the developer that could face challenges here with potential monetary penalties of up to £10,000 or 10% of the house purchase price,” he says. “Another challenge is potentially higher premiums in securing warranty provision.”

On this point, Hill’s head of quality, Andy Mullins, says that as a housebuilder there are significant concerns about how much costs will fall on them.

“The biggest impact is likely to be the cost of warranty cover – indications we’ve had from some of our warranty providers are that it would be quite significant,”

Mullins says. “We would say disproportionately significant compared to what it costs for the years one to 10, especially against a backdrop of the general increased cost of development through recent legislative and market conditions.”

Mullins adds that, to Hill’s knowledge, there has been no widespread call for the changes nor “substantial evidence indicating quality issues in new homes during years 10 to 15”.

Ultimately, these costs must be absorbed by someone, whether it is the developer, the homeowner, or a rental landlord. This could impact the overall viability of a project for minimal discernible benefits, and it





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does not necessarily correlate with the quality of the homes.

From a legal standpoint, Theresa Mohammed, partner at Watson Farley & Williams, says the changes would undoubtedly have an impact on how projects are approached.

"It's always significant when legislation extends the period of liability, because that's the starting point," she says. "The starting point of any legal claim is: do you have standing, are you in time? So, anything that alters the amount of time you have to make a claim is a very significant legal change."

But Mohammed adds: "It's not as significant as other changes that have been made by the Building Safety Act. But it is another one, and a change of five years is not an inconsiderate amount of time. That is a decent chunk of time to extend liability."

Added costs

James Green, partner at Calfordseaden, adds that while there are clear positives for the



It's yet to be fully resolved who pays the cost of replacing unsafe cladding on high-rise blocks of flats. Extended warranties would offer more clarity in future

introduction it is important to realise the added costs go beyond just additional warranty costs.

"If the warranty period is 15 years, then in terms of other knock-on effects for consultants working on the projects there will be an additional impact," he says. "Currently consultants and designers will provide liability under appointments and through collateral warranties which often run to 12 years and, if this is to change, there could be an impact on the premium associated with PI insurance – all cost which will ultimately be passed back to the client."

Jo Briggs, Calfordseaden's in-house legal counsel, adds that it remains to be seen how significant the change will be when it comes to impacting contractors' approach to specification and design of buildings. "From the early stages of the project, I don't think having a 15-year warranty will affect how things are built too significantly. If people are in it for 10 years, 12 years or 15 years, I am keen to see whether there is a notable change in people's approach to

specification and construction moving forward to take account of the additional liability period."

But Watson Farley & Williams' Mohammed says this change, like other reforms in the Building Safety Act, is clearly pushing for improved quality and that this will be reflected in the direction procurement is moving. "The common theme appears to be that what you really need to focus on more is quality – the details as to the levels of site supervision, workmanship, how contractors and subcontractors perform. That kind of enquiry will be much more focused upon," she says.

Greater clarity

Mohammed says that the reform on warranty periods is also likely to see procurement considerations increasingly factored into what the materials firms are proposing to use and that clients will be looking for greater clarity over the specifications and technical details of projects.

She adds: "Of course, maintaining information and sharing that information during

the lifecycle of any building or any project will also be paramount. So, changes such as the warranty reform are all set to prioritise these factors rather than what we used to have, which was just 'who's the cheapest hands up?'"

LABC's Stimpson also believes this effect will be significant, saying that while it may have a negative impact on project costs the changes should drive up quality.

"We work with developers very, very closely and we know that mostly they are doing their level best," she says. "For others a cultural change may well be required."

With the details of any changes not yet known, it is difficult to navigate the impact the reform of warranty regulations will have on projects. While clearly many hope the change can help drive a cultural shift, there are concerns around the ways in which project teams can be hit financially.

The Department for Levelling Up, Housing and Communities did not respond to requests for comment.



A SUPPLEMENT BY



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LABC Warranty works in partnership with Local Authority Building Control (LABC) to provide structural warranty services. Their unique partnership means that together they provide building control and warranty services across England and Wales through a network of more than 3,500 surveyors.

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