



Builders, NOT Blockers

Regulators and the
growth mission

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Contents

Foreword	2
Value of innovation	4
Cuts fall hardest on the proactive and most valuable work	6
Keeping people working	8
Data: the feedstock of economic transformation	12



Prospect is the leading UK union for
engineers, managers, and specialists.

We represent more than 156,000 workers
across the public and private sectors,
including thousands of members working in
energy generation, transmission, distribution,
and research roles around the UK.

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Foreword

The topic of regulation has been high on the political agenda consistently over the last decade. First there was the political argument advanced by some that exiting the European Union offered opportunities to remake Britain as a sort of deregulated Singapore-on-Thames. Not only did this ignore the fact that Singapore is actually a highly regulated economy, but Brexit entailed a huge increase in the workload of many regulators and created additional barriers for businesses who largely craved convergence, not divergence.

That debate over Brexit has transmuted into an argument by the Labour Government that, in the absence of significant fiscal firepower, growth can be achieved through a new approach to regulation. This new approach includes challenging regulators to allow greater risk-taking, attempting to reduce the number of regulators and avoid duplication, and legislative change to reform regulation, particularly in the planning process.

The argument has been driven hard by the government, with the Prime Minister characterising regulators as “a cottage industry of checkers and blockers” who are holding back economic growth. Much of this debate has been centred on anecdotes of perceived regulatory overreach, from bats to jumping spiders, which are of dubious accuracy and clearly selected to provoke derision.

Prospect has a unique insight into this debate. We are a pro-growth trade union, with members working in industries such as energy and technology which are at the forefront of industrial strategy. We are deeply invested in the building of new energy and transport infrastructure that is essential to the UK’s economic future.

Prospect also represents thousands of skilled staff working across dozens of regulatory bodies, from Natural England and the Environment Agency, to the Office for Nuclear Regulation and the Health and Safety Executive. We are proud of the work these members do: they are expert problem solvers, uniquely qualified to advise and course-correct developments to ensure lasting growth. We do not believe they are being fairly characterised in this debate.

Prospect is not opposed to regulatory reform, and has engaged constructively with the government's proposals around the planning process. But we do believe we need a more mature assessment of regulation in its current form. Chesterton's Fence principle (do not remove a fence until you understand why it was put there) reminds us that effective reform must be based on complete knowledge.

This report is an attempt to restore the balance, drawing on the experience and expertise of our members working in regulation with a series of case studies, to make the following arguments:

- **Builders not blockers:** Regulators are often the foundation of economic growth, supporting innovation, providing certainty, and helping bring products to market. They should be supported to do more of this important work.
- **False economy:** The deliberate underfunding of regulators by the previous government has been one of the key contributing factors to delays faced by business. This underfunding has led to serious staffing issues and the inability of many regulators to recruit and retain expert staff. To minimise the regulatory burden on

business, the focus should be on resolving these funding issues and easing capacity constraints within regulators. The Government should also implement Recommendation 6 of the Corry Review, and work with unions to implement pay flexibility which can support recruitment and retention.

- **Early engagement:** Regulators operate best when they are able to engage with business at an early stage, taking a proactive approach to solving problems and helping businesses comply with regulations. Many of the issues we are facing come not because regulators are too involved, but because they are not involved early enough. Government should encourage, empower, and fund regulators to take a front-foot, enabling approach.
- **Play the ball:** Different political actors have a variety of complaints about the regulatory process. Some of these are fair, some less so. But in almost all cases, regulators are simply implementing the legislation that governs their activity. Debating this legislation is of course legitimate, but simply attacking the regulators themselves is neither fair nor productive and contributes to a destructive and inaccurate narrative on regulation.

We hope this is a useful contribution to this debate. We do not believe that economic growth and good regulation are mutually incompatible, quite the opposite. By putting the voice of regulators themselves back into this debate we hope it will become obvious that our members are not 'blockers'- they are essential to growth and the government's Missions, and essential contributors to strategic regulatory reform..



Value of innovation

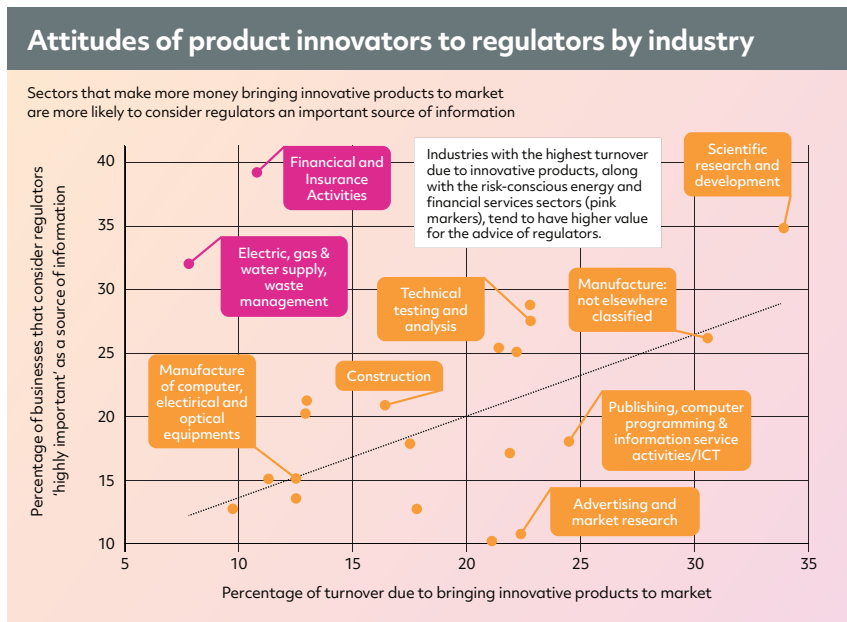


The callow caricature of regulators as ‘blockers’ of growth, and particularly of innovative growth, is based on ideology, and simply not borne out by the evidence. The latest report¹ from Innovate UK shows that ‘innovation active’ businesses rate UK regulations only ninth, and EU regulations twelfth among potential barriers to innovation. More important concerns include factors such as energy prices, availability of finance, lack of specialist skills, and Brexit.

Conversely, innovative businesses rate regulators highly as important sources of information to support innovation, for reasons such as those neatly exemplified by our patent examiner. In fact, regulation can be a catalyst to innovation. The EU ban on microplastics, for example, has spurred the rapid development of alternative products, and put their creators ahead of the inexorable global trend towards environmental sustainability.

A cross comparison of product innovation with attitudes towards regulators, shows that the very industries that are building the UK economy through marketing innovative products are (along with the risk-conscious energy and financial services sectors) the ones that tend to have the highest value for the advice and support of regulators. We would welcome more insight from the many businesses making good use of regulators’

expertise: whatever they’re doing right, let’s resource the regulators to support more of it.



The Innovation Survey also serves a stark reminder of regional disparities in innovation activity. We argue that investment in regulators’ capacity to proactively support businesses across the UK is an opportunity genuinely to ‘level-up’ innovation and stimulate growth. Prospect members highlight ‘uneven’ distribution of regulatory capabilities across the devolved nations, and call for any regulatory reform to give due regard to both devolved rights and the connectedness of our industrial, economic and environmental ambitions.

1 <https://www.ukri.org/wp-content/uploads/2024/12/IUK-051224-StatelInnovation2024Report.pdf>



Patent Examiner

Intellectual Property Office

When somebody claims they've invented something new, I compare it to what has been previously created and assess if their claim is valid.

For example, food packaging needs to be sealed with "barrier properties" to keep food fresh so it tends not to be recyclable or biodegradable. It often ends up incinerated or in landfill, which has obvious negative environmental impacts.

Somebody invented a way of effectively applying a coat of stone chips onto biodegradable base material, which could be used for food packaging. I helped them define their invention in a way that made it commercially attractive, and

it led to them becoming a supplier to a significant company.

It takes years to train someone to provide this expert support. The investment needed to develop the right skills has led to a shortage of examiners in some technology areas. This, in turn, limits the support that can be provided, often resulting in significant delays.

The IPO can help the Government meet its environmental goals through new innovations. Plus, encouraging people to devise and share better ways of doing things will kickstart economic growth.

Cuts fall hardest on the proactive and most valuable work



Prospect members working in scientific and environmental roles, by training and by practice, are systems-thinkers and problem solvers. They don't want to be saying 'no' to developments; they want to help course-correct businesses towards projects and products they can say 'yes' to. Unfortunately, decades of public spending decisions have constrained their ability to put their skills to the proactive service of growth.

A recent survey on national resilience² highlighted deep frustration that inadequate funding has left specialist public services in 'firefighting mode': resourced only to deal with the next emergency, and not to prevent it. The key to a pro-growth regulatory environment is to resource regulators and other specialist advisory services to get involved earlier in planning, and in product development lifecycles, to smooth the regulatory process, suggest mitigation strategies, and help articulate new products for commercialisation.

Natural England and the Environment Agency both saw budgets cut by more than half in real terms under the last Government, and levels of funding have yet to fully recover.

They were also subject to centrally imposed pay freezes and caps that saw salaries lose more than a quarter of their real value and left them struggling to recruit and retain the skills and expertise they needed.

The latest official data shows that Natural England was unable to meet target response times for 1,155 planning applications in 2023-24 as a result of "agency resourcing (e.g. workload issues, staff absences, availability of specialist expertise)" – with this reason accounting for 68% of missed deadlines. The number of applications delayed by resourcing issues has increased more than twenty-fold over the past ten years, accounting for 73% of the increase in total missed deadlines over that period.³

In the same year the Environment Agency missed target response times for 593 planning applications due to "agency resourcing (e.g. workload issues, staff absences, availability of specialist expertise)", with this reason accounting for 73% of the total number of missed deadlines.⁴

The Corry Review – April 2025

Recommendation 6: Assess potential for regulators to have targeted pay flexibility so they can employ and retain staff, particularly specialist staff. This should be considered as part of the Spending Review settlement and involve seeking specialist pay rates, or more flexible pay bands, especially for positions that require unique skills or are difficult to fill. This can help ensure that salaries are competitive with the private sector and experienced staff are retained.

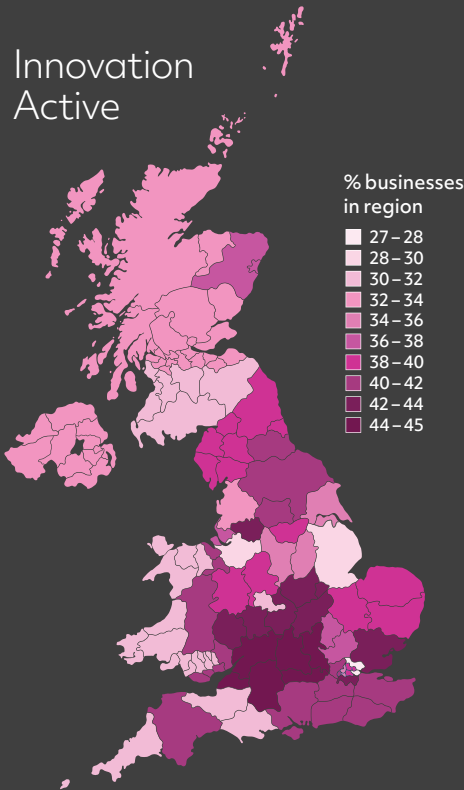
2 <https://library.prospect.org.uk/download/2025/00238>

3 <https://www.gov.uk/government/publications/natural-englands-response-times-to-planning-consultations-in-england>

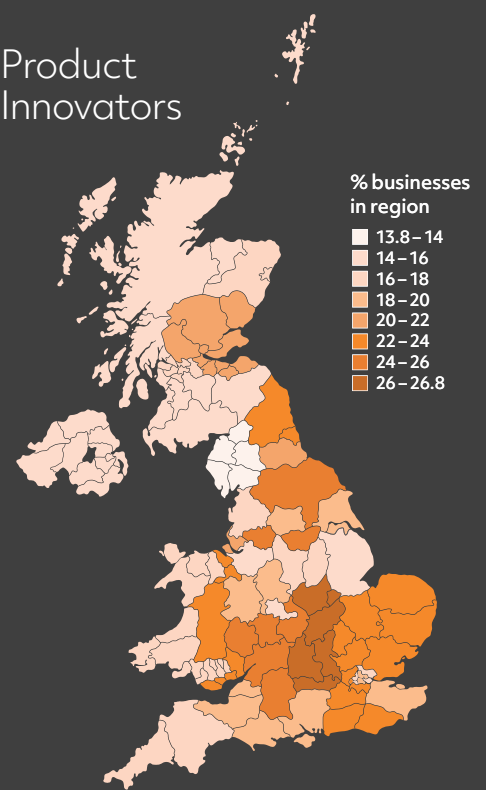
4 <https://www.gov.uk/government/publications/planning-consultation-response-timeliness-environment-agency>



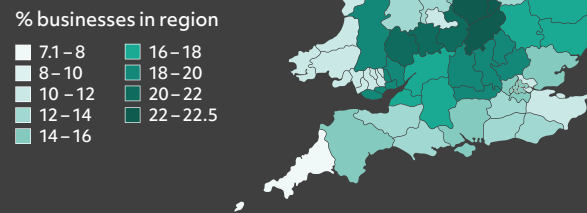
Innovation Active



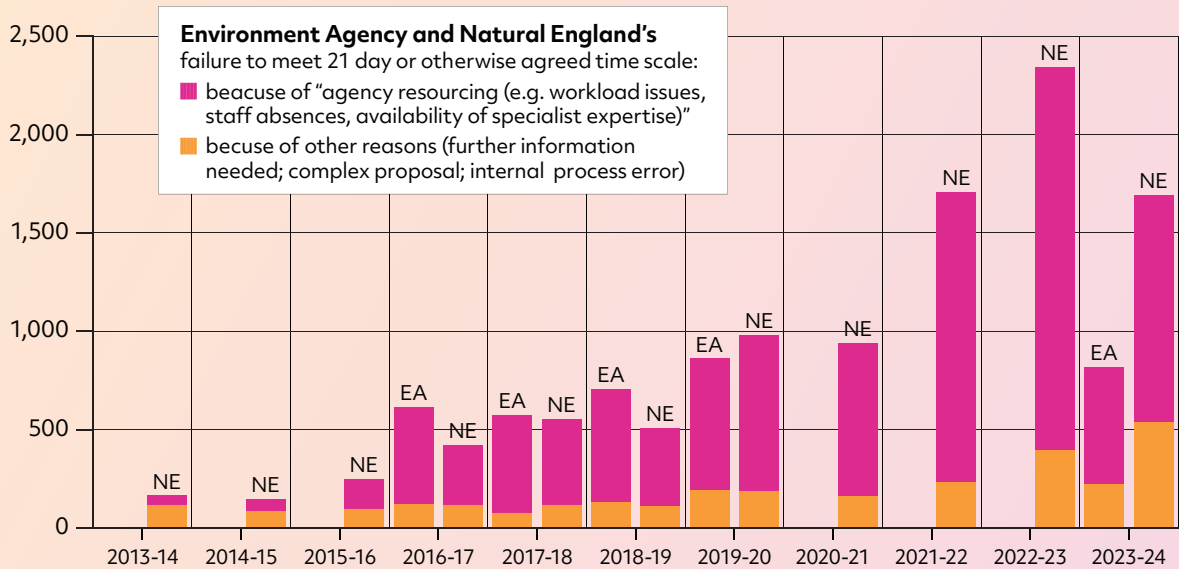
Product Innovators



Internal R&D



Timeliness on responses to planning consultations



Senior Scientific Officer

Animal and Plant Health Agency

I lead the Campylobacter research group within APHA, carrying out surveys in the food production sector and investigating the prevalence of Campylobacter.

Campylobacter is the leading cause of bacterial gastroenteritis in the UK with more than 50,000 cases reported per year, but most cases go unreported, so the true figure is likely in excess of 300,000.

Most incidents just lead to an upset stomach, but severe complications occur in 5% of cases and they will require hospital treatment.

Our work directly contributes to the government's plans to tackle and control antimicrobial resistance (AMR) by 2040, and although it doesn't directly influence economic growth, the cost of AMR on the NHS is estimated to be £180 million annually.

While we are well funded for the work we need to do, where we fall short is funding for additional staff to keep up with the demanding workloads, and appropriate remuneration for the work we do. In the science directorate, we are all highly specialised with multiple degrees.

I fear that if things continue, we'll see a greater brain-drain, from the public to the private sector, which will negatively impact our ability to meet the government's 2040 targets.



Principal Officer

Natural England Wildlife Licensing Service

We are a team of experienced wildlife advisers within Natural England, who lead on wildlife licensing advice for major infrastructure projects.

We provide early input and bespoke advice for a wide range of proposals requiring protected species licences, but our focus is on supporting housing and transport projects; in particular Nationally Significant Infrastructure Projects and those within the clean and renewable energy sectors.

Our aim is to resolve any potential wildlife licensing issues through early, pre-application (pre-planning consent) input, using strategic and landscape-scale solutions wherever possible.

We also want to establish better relationships with key delivery partners such as Network Rail, National Highways, National Grid and the Environment Agency to work collaboratively to deliver shared aims for nature and wildlife, alongside priority national infrastructure.

The advice we offer smooths the regulatory process and supports the faster delivery of renewable energy projects, key transport schemes, and major housing developments in line with the government's ambitions to boost infrastructure spending and to build 1.5 million new homes within the next parliament.

However, without additional resources and staff, demand for pre-application advice for all these new infrastructure projects, particularly on wildlife licensing topics, will soon outstrip our ability to respond to such requests.

Keeping people working



Government, businesses and trade unions share concerns about recent increases in the loss of working days to ill health. We may differ in our views of how to manage the sickness absences we have, but we must agree that prevention is better than the cure.

Trade unions rightly celebrate how the work of our health and safety reps, and our campaigns for safe and inclusive working conditions help to keep Britain working. Prospect also recognises the vital contributions made by regulators across workplaces, public health, buildings, food standards, and plant and animal health. Theirs are roles we don't think about (and may prefer not to) unless things go wrong, but as a nation we neglect them at the risk of our economy as well as our health.

On top of the costs to the NHS, and serious complications for some patients, infectious intestinal diseases (IIDs), dominated by campylobacter, have been estimated to account for 11 million lost working days each year⁵. At the time of the study, in 2011, that amounted to an extraordinary 8.3% of all working days lost to ill health.

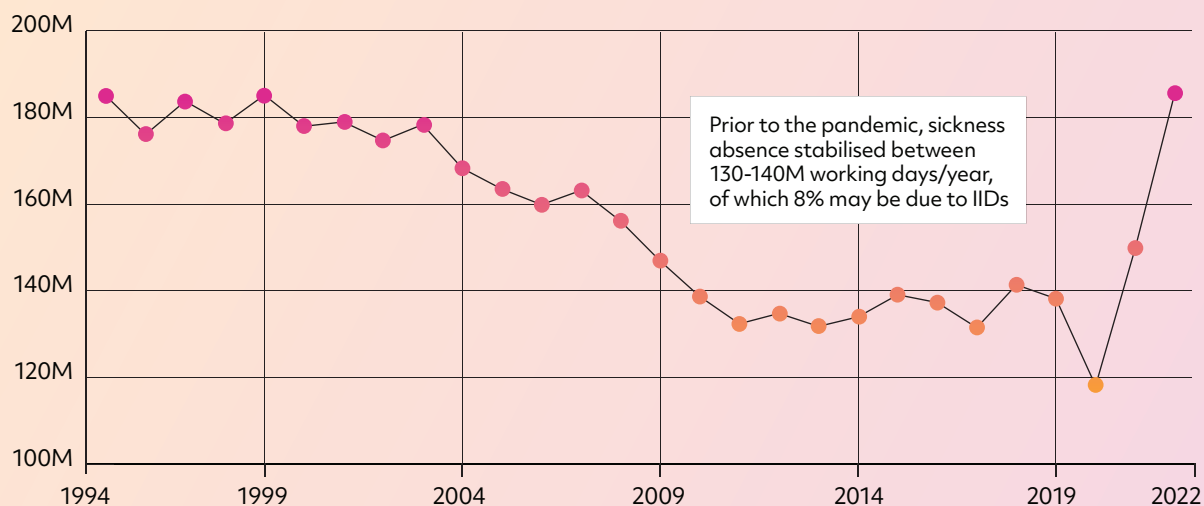
A 2016 government green paper⁶ put the total economic cost of sickness absence, caregiving and health-related productivity losses at £100bn annually: a compelling offset to investment in preventative regulation, monitoring, and protective measures.

5 <https://www.manchester.ac.uk/about/news/11-million-working-days-lost-from-stomach-upset/>

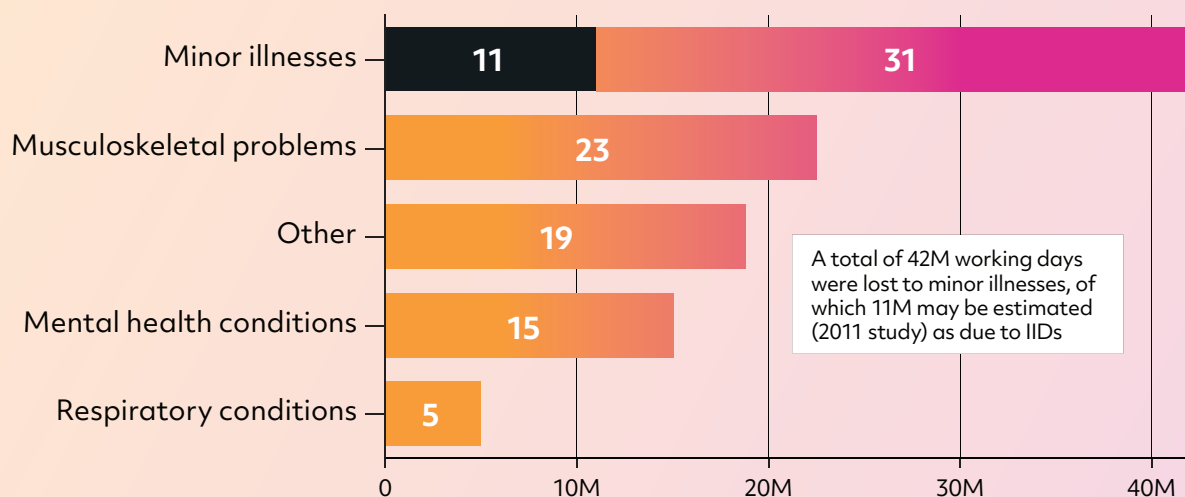
6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/644090/work-health-and-disability-green-paper-data-pack.pdf



Working days lost to ill health, in millions, 1995-2022



Days lost by category of ill health, in millions, 2019



Environmental Fate Specialist

Cambridge Environmental Assessments (CEA)

I provide regulatory support to clients through environmental fate modelling and data analysis. We work on a wide range of compounds including veterinary medicine, pesticides, biocides and human medicines.

My work determines how veterinary medicines, pharmaceuticals, biocides, and Plant Protection Products interact with soil, water, and air systems; helping clients with the UK and EU regulation while supporting the safe and sustainable use of chemical compounds, which are essential for the agricultural sector.

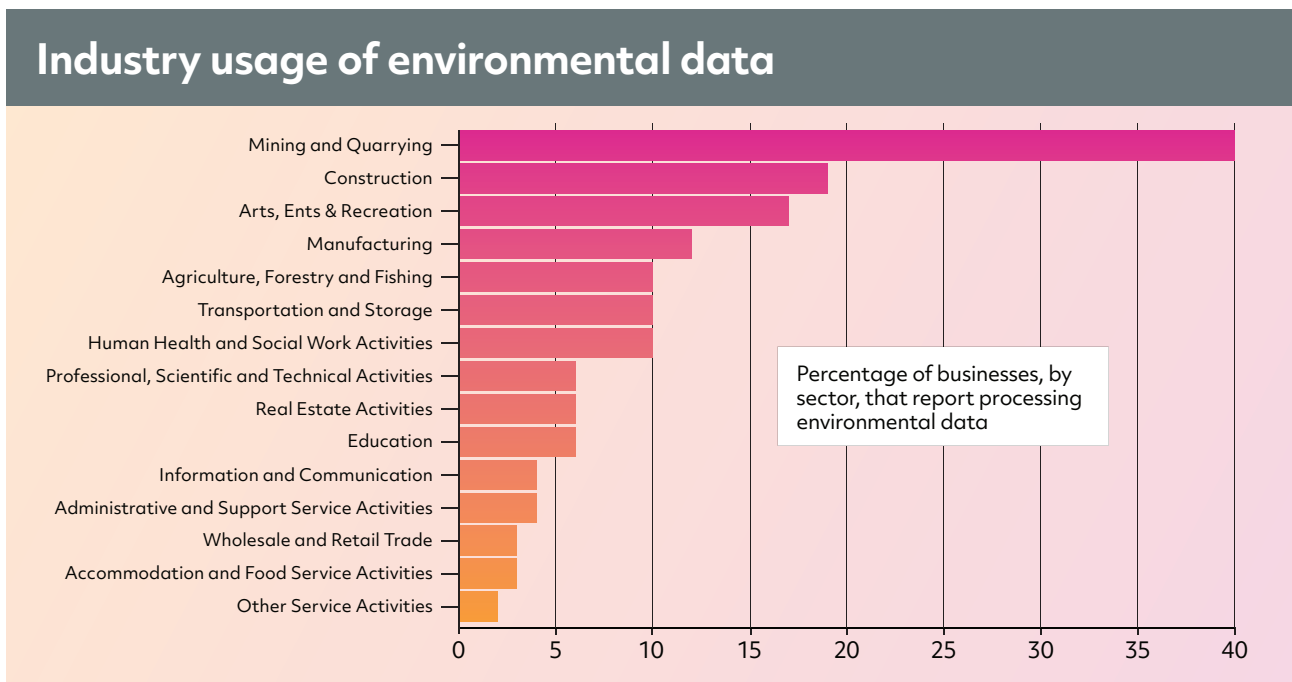
By providing solid scientific evidence on how chemicals behave in our ecosystems, we support the UK's 25 Year Environment Plan, particularly around sustainable chemical use and protecting our water resources by informing decisions that balance development needs with protecting our natural heritage for future generations.

When it comes to kickstarting economic growth, environmental risk assessment creates regulatory certainty to industry and consumers.

It is essential for companies to conduct a comprehensive risk assessment and compile scientifically sound registration packages to place their products on the market, and we work with our clients to assist in that regard.

If during our risk assessment we spot an issue with the product we can either refine the assessment for a more localised context or suggest mitigation strategies which will allow the product to be placed on the market while used safely.

Data: the feedstock of economic transformation



The mobilisation of data, and notably public sector data, across the economy is a central tenet of the government’s industrial strategy proposition. The recent DSIT business data use and productivity study⁷ highlights environmental data as having widespread importance across industries as diverse as mining, construction and entertainments.

Prospect’s submission to the industrial strategy consultation⁸ acknowledges the contribution that the environmental and geosciences make not only to the propagation of environmental data, but also to the practice and technologies of data

management itself. Our members at the NERC data centres are currently providing world-leading expertise, for example on sensor data and lineage metadata management, to vital, economy-wide initiatives such as the National Data Library.

The concern that budgetary pressures at the ‘supply end’ may fundamentally undermine the potential of environmental data throughout its value chain is one shared by data professionals across all sectors and subject areas.

7 <https://www.gov.uk/government/publications/business-data-use-and-productivity-study-wave-1>

8 <https://library.prospect.org.uk/download/2024/00680>



The UK Data Management Association's submission⁹ to the industrial strategy consultation called for the mobilisation of public sector data to be enabled "by investing substantially in data management of public sector data assets, with resources and training... and by coordinating the development, facilitating and, where appropriate, mandating adherence to industry or domain data standards."

Prospect members working on environmental and geospatial data standards, across Ordnance Survey, the NERC-funded institutes, the Met Office, the Environment Agency and more, are laying the foundations of our data-driven economy. This is the work that enables seamless connection of data across agencies, in operational monitoring, alerts and incident responses, and keeps the UK at the heart of international research coalitions. It is heavily dependent on core institutional funding, however, and often overlooked in favour of capital investments and the flashy AI projects that ultimately depend on it for their success. It is highly vulnerable to budget restraint, and notably the recently announced cuts to UKRI National Capability funding.

Once again, specialist public servants are eager to be agents of growth, but bare-bones funding of their institutions too often obstructs them from the strategic, enablement activities they are uniquely qualified for.



Prospect members working on environmental and geospatial data standards, across Ordnance Survey, the NERC-funded institutes, the Met Office, the Environment Agency and more, are laying the foundations of our data-driven economy.

9 https://www.dama-uk.org/resources/Documents/DamaUK_ResponseSummary.pdf



Data Steward

UK Centre for Ecology and Hydrology

I provide support and guidance to researchers in planning and best practice relating to data management. I also create and deliver interactive training courses to upskill researchers on various aspects of research data management.

Furthermore, I am responsible for curating and publishing data at one of the Natural Environment Research Council's data centres, ensuring publicly funded data are Findable, Accessible, Interoperable, and Reusable, or FAIR in short.

Crucially, FAIR ensures these data are available to the research community and can inform policy debates in the long term. Good research data management and FAIR data are critical for research integrity and enable maximum use and reuse of data.

This is essential to achieve policy objectives such as Net Zero, improving resilience to floods and droughts, and restoring habitats and biodiversity. These are challenges that require collaborative and interdisciplinary solutions.

Understanding long-term environmental data informs policy and enables research and innovation. The UK government funds a large proportion of this.

However, budgetary pressures on researchers limits the time they can invest in practicing and developing good research data management. This fundamentally undermines their ability to deliver the long-term data integration needed to provide solutions to today's, and tomorrow's, environmental challenges.





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