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**RESEARCH PAPER**

## **Building Control: Evaluating the SBCA Building Approval Process: Procedural Red Tape and its link to Illegal Construction**

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### **ABSTRACT**

This policy paper examines the approval regime of the Sindh Building Control Authority (SBCA) and identifies a systemic “Compliance Conflict” at its core. It argues that excessive procedural delays—rather than weak regulation—are the primary drivers of illegal construction across Sindh’s major cities in 2025. Approval timelines that extend from the statutory 60 days to 18–24 months, combined with high financing costs, have made non-compliance economically rational for developers. The study highlights structural failures, including fragmented NOC processes, centralized decision-making, revenue-driven regularization practices, and weak on-site monitoring. It contends that illegal construction is a market response to state-induced administrative gridlock. The paper proposes a phased reform roadmap: short-term measures to restore data integrity and halt moral hazard, medium-term legislative and liability reforms to shift accountability, and long-term adoption of AI-enabled monitoring and infrastructure-linked zoning. Collectively, these reforms aim to transform SBCA from bureaucratic control to digital facilitation, restoring regulatory credibility and urban safety.

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**KEYWORDS** Building Approval Process, Procedural Red Tape, Illegal Construction

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### **Introduction**

Sindh Building Control Authority (SBCA) is the main legal custodian of the built environment in the entire province and the main regulatory fraternity of some of the fastest-growing urban areas of South Asia. Although originally known as Karachi Building Control Authority (KBCA), its province was also extended in 1979 through the Sindh Building Control Ordinance (SBCO) 1979 to cover not only the demographic primates of Karachi but also the secondary urban centers of Hyderabad, Sukkur, Larkana, and Mirpurkhas. The SBCA is a legal entity that under the Department of Local Government has the authority to plan the town, approve architectural and structural designs and to enforce the high standards of adherence to the zoning and safety codes (Government of Sindh, 1979). And in a period that marks the start of a seismic change in low density horizontal growth and high-density vertical stability, the role of the Authority is very important: it is the state apparatus to balance the harsh market demand with the non-negotiable demands of urban management and urban stability.

As a measure to enforce this requirement, the Karachi Building and Town Planning Regulations (KBTPR) 2002 is the foundation governing the operation framework of (SBCA). These by-laws are a regulatory guideline to construction,

particularly in Karachi and have been modified into regional directorates in the entire province. Within these rules, a Single Window System (SWF) was created, which could also be understood as a system to provide a unified, pollute-free exchange between developers and owners of a home. Theoretical workflow is planned; a proposal is offered by a builder through a licensed professional (architect or structural engineer) and this starts the process of time testing based on the master plan and density quota. The laws specify a maximum statutory amount of time, typically 60 days in the case of a public sale project, out of which the power must either approve or provide legitimate technical objections. The idea behind the system was to create a one-stop shop to reduce the available options to discretion and ease the course of law through the clear procedures (KBTPR, 2002).

Nonetheless, the contemporary fact in the construction industry, particularly in the high-demand regions of Karachi is the apparent and debilitating disconnect between the rules and regulations behind these processes with the realistically situated situation. The Single Window Facility (SWF) has developed into a labyrinth of procedures with its own strategies of transparency, redundancy, and division of labor. Critical reflection on the workflow reveals a systemically crippled system where the approval process is caught in a sea of outside dependencies, the red tape. Despite the stated requirements of the (SBCA) regulations indicating that the entire process is unified, the fact remains that the builder must undergo a parallel run of irrelevant No Objection Certificate (NOC)s with external agencies to file the SBCA file. Any developer cannot get the approval without the approval of the Karachi Water and Sewerage Board (KWSB), the Sindh Environmental Protection Agency (SEPA) and other land-owning agencies like the Karachi Development Authority (KDA) or the Board of Revenue. The system of not integrating the institutions between them creates an obstacle where the statutory 60-day is usually extended between 18 and 24 months (Ahmed, 2018). Although there are regional directorates in Hyderabad and Sukkur, when it comes to administrative centralization, the transfer of files directly to Karachi headquarters is often necessary and poses an extreme logistic challenge to an already sluggish process.

These administrative delays have a tremendous compliance cost in an economic environment with double-digit inflation, currency wandering and large-interest land loans. Time is a quality financial parameter among the construction industry. When a two-year wait in NOC restrictions and manual examination causes a project to take two years to start, interest and opportunity costs on loans can be higher than the profit margin of the legal project (Association of Builders and Developers [ABAD], 2023). It is the causal connection between the intricacies of the process and the illegal construction epidemic. The existing approval process by SBCA efficiently poses a conflict of compliance, where the system punishes those who procrastinate so as to avoid insolvency, and instead rewards legislators who break the law. A rational economic calculation which is made by builders all over Sindh is that, the cost of waiting years to get a permit is much greater than the cost of non-compliance (bribes payments or the future fines of regulatory methods). Thus, legal framework that exists does not regulate the illegal constructions; it evolves them successfully. The state is sending the message to the market that exemptions are cheaper than permission by continuing to have a system where centralized and redundant processes hinder the passage of a law, and the city has become beset by unauthorized unsafe buildings that are putting the future of urban centers in Pakistan at risk (Siddiqui, 2022; Hamid, 2025).

The Sindh Building Control Authority (SBCA) is a well-intentioned mandate that is crippled by poor institutional capacity, which translates to endemic corruption,

complexity of process and political interference. On the legal front, the authority has had to contend with old building codes which do not conform to the influx of high-rise buildings in the vicinity. Because of confusion in zoning regulations and frequent legal loopholes, a non-conformance builder has an easy time defying enforcement with a court order. The system is, in fact, seriously flawed in surveillance. Field engineers do not need to go through a phased inspection process and thus it is possible to erect illegal floors once they have been approved initially. Technical glitches have further enhanced this lack of monitoring, including the absence of real-time GIS mapping and electronic record keeping that makes the grievance system ineffective to the citizens.

Furthermore, close jurisdictional lines make it a shaky regulatory environment. There is no Single Window System in place and this results in a situation where there are conflicting land controls systems between the SBCA and cantonment boards and institutions like KDA, MDA, LDA and Pakistan Railways. This arbitrary bureaucratic inertia in such a market driven by high housing demand provides a negative incentive hierarchy. To escape bureaucratic red tape, builders have no option but to construct with low cost and illegally to evade bureaucratic controls. Consequently, the illegal construction is not controlled in the present framework of the SBCA, it simply enables it, yet, it has not updated its capacity and covered the jurisdictional overlaps.

## Material and Methods

This study uses a Qualitative Desk Research Design to assess the Sindh Building Control Authority (SBCA) approval process and respond to the research questions on the procedural red tape, inefficiencies in monitoring, and digitization. This method is based on the critical evaluation of legal statutes, judicial history and institutional reports to compare the mandates of the statute (de jure) with the reported realities of operation (de facto).

### Research Design

The research applies a Doctrinal and Socio-Legal Analysis model.

**Doctrinal Analysis:** Interprets the law of black letter so as to lay down the official approval procedures.

**Socio-Legal Analysis:** Examines concrete gaps of implementation with references to court decisions and reports of international performance.

### Data Collection Sources

To conduct the Research Objectives, the study relies on three types of secondary sources:

**Legal/Regulatory Environment:** The Sindh Building Control Ordinance, 1979, Karachi Building and town planning regulations and Sindh local government act. To chart the "Official Process" and set out the statutory 60-day period.

**Jurisprudence Records and Case Laws:** Supreme Court of Pakistan decisions (e.g., *Suo Moto Case No. 1/2011*, *Nasla Tower Judgment*) and decisions of the High Court on the illegal constructions. To offer factual support of inspection lapse, government complicity, and regulatory negligence channels.

**Institutional Reports:** World Bank Ease of Doing Business reports (section of Construction Permits), audit reports of Auditor General of Pakistan, and publications of ABAD (Association of Builders and Developers). To collect quantitative data regarding mean approval delays (18-24 months), official costs and, the situation with digitization.

## Data Analysis

Each process is analyzed based on the gap between its actual or planned state and its desired condition. The paper contrasts the Statutory Workflow (as used in the KBTPR 2002) with the Actual Workflow (as recorded in World Bank data and Case Law).

**Thematic Analysis:** Coding of judicial judgments is done to reveal recurrent themes like: Lack of Stage-wise Inspection, Manual Discretion, and Political Interference.

**Economic Evaluation (Secondary):** The research approximates that Cost of Compliance (Time + Fees) vs. Cost of Non-Compliance to prove the economic advantage of illegality through financial data of ABAD and World Bank reports.

## Situational Analysis

Knowing how illegal constructions have spread all over Sindh requires one first to understand how the legal works. Here, we are comparing the legal (de jure) framework set by the Karachi Building & Town Planning Regulations (KBTPR) 2002 with the daily (de facto) practice which is the developers' operational reality. The examination shows that the "Single Window Facility" is far from being a simplified tool for communication between different departments and rather it acts as a procedural bottleneck.

### The De Jure (Official) Workflow: The Theoretical Framework

By law, the SBCA must implement a clear, time, limited system for approving requests. The rules set apart projects by their complexity and risk, thus providing the two different timelines.

**Fast Track 15, Day Timeline (Category, I):** A simplified method has been launched by the Authority for residential bungalows on plots up to 399 sq. yards. The main purpose is to make life easier for individual homeowners and to enhance the World Bank "Ease of Doing Business" ranking. In case a Licensed Professional submits a plan that is in line with the Master Plan, the SBCA is supposed to grant the permit within 15 days.

**Table 1**  
**Comparative Matrix: Statutory vs. De Facto Approval Timelines**

Project Category	Official Statute (KBTPR 2002)	Actual Average (2023-24 Data)	Primary Cause of Delay
Category-I (Small Res.)	15 - 30 Days	45 - 90 Days	Manual Title Verification
Category-III(Commercial)	60 Days	12 - 14 Months	External NOCs (KWSB/SEPA)
Category-IV (High-Rise)	60 Days	18 - 24 Months	Centralized Scrutiny in Karachi

This table visually proves the "Red Tape" argument by contrasting the law with reality.

**The Statutory 60, Day Timeline (Category, III & IV):** The primary focus of this study is large scale developments, Commercial High, Rises and Public Sale Projects, for which Regulation 3, 2.6 of KBTPR 2002 is the main legal provision. It requires that the

Authority should take a decision giving or denying permission within 60 calendar days of the application.

**The Process:** The builder files the ZP, 1 Form through the Single Window Facility. The file is to be examined concurrently by the Town Planning and Structure Departments. If there are no technical objections regarding the Floor Area Ratio (FAR) or structural stability, the approval is in order under the law.

### The De Facto (Actual) Workflow: The "NOC Labyrinth"

Basically, the 60 days set by the statute for the procedure becomes almost meaningless because of the system's reliance on external entities. The Single Window Facility is not an inter departmental system, it is just a place where the file is kept on hold till the builder physically obtains the clearances from the different institutions. Due to this, there is a deep NOC Labyrinth whose timeline is extended up to 18, 24 months.

**Utility NOCs (KWSB/WASA & SEPA):** The builder, prior to the SBCA processing his file, must get a No Objection Certificate from the Karachi Water & Sewerage Board (or WASA in Hyderabad) and the Sindh Environmental Protection Agency (SEPA). These independent agencies have their own timelines and usually delay the issuing of NOCs for 612 months, citing reasons such as "Infrastructure Development Charges" or Environmental Impact Assessment (EIA) reports.

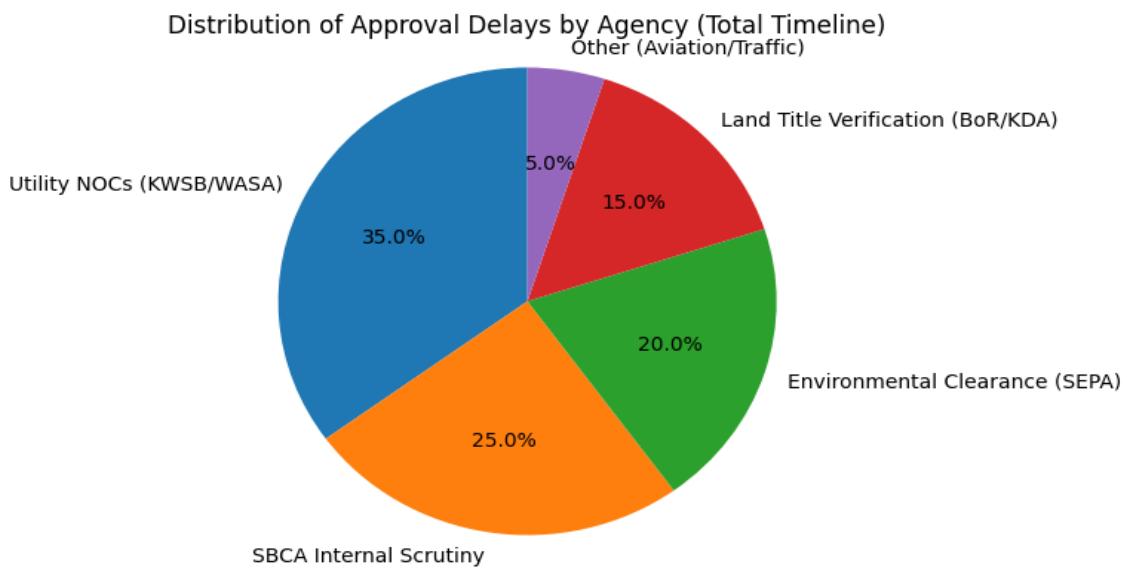


Figure 1: Distribution of Approval Delays by Agency

This chart shows that the SBCA is not the only culprit; the fragmentation of the system is the issue.

**The "Forwarding Letter" Redundancy:** Even if a builder has a registered Sale Deed (which is a public document), the SBCA still demands a new "Title Verification" or "Forwarding Letter" from the agency that owns the land (e.g., KDA, Board of Revenue, or Housing Societies). This is a redundant step in the procedure which falsely assumes that the registered title may be forged, thereby compelling the builder to verify the already verified documents again.

**The "Manual Loop" in a Digital System:** Although the first submission is made electronically, the internal inspection is still done manually. Files are moved physically from one department to another among Town Planning, Structure, and Architect. To be more precise, the objections raised in the file are most of the time done one after another rather than parallelly. For instance, a file can be in the Structure Department for three months, and after getting it back for a minor correction the staff may send it to Town Planning from where a new set of objections is received. This "ping, pong" effect is basically the main method by which the soliciting of "speed money" is carried out.

### **Jurisdictional Fragmentation: The Governance Vacuum**

The approval process is also very slow and inefficient due to the disorderly division of land control in Sindh, especially in Karachi. The city is not one administrative unit, but a collection of different and even opposing jurisdictions.

**Conflicting Claims:** Most of the time, the federal and military agencies who own the land challenge the SBCA's writ. A developer can have a piece of land in an area the control of which is a matter of dispute between the SBCA, Cantonment Boards, Pakistan Railways, or the Karachi Port Trust (KPT).

**The "Notified Area" Dilemma:** There are lots of areas where the question arises as to which Master Plan should be followed (for instance, some parts of Scheme 33 or the districts adjacent to Cantonments). The constructors are frequently found to take advantage of this unclear situation in such a way that they get a permit from one agency and at the same time they are in violation of the zoning laws of another. As another option, builders who are abiding by the rules find themselves in a kind of "regulatory limbo" where they cannot obtain permission from either side as both agencies claim the land but do not issue the NOC.

The "As-Is" process shows that the 60, day statutory limit is, in fact, just a facade. The stipulation that one has to go through the "NOC Labyrinth" and deal with the jurisdictional conflicts while not having a shared digital database for the authorities makes it so that the whole process of compliance is built in such a way that it will fail, hence, the only efficient way to finish the project is illegality.

### **Critical Analysis: The Drivers of Illegal Construction**

The unchecked growth of illegally built high, rises in Karachi and other secondary cities of Sindh is not just indicative of a lawless scenario; it reflects a market reaction that one could have foreseen to the malfunctioning regulatory framework. The following section unpacks the causal factors, showing that the present functioning framework of the SBCA is, in fact, a 'compliance trap' that 'rewards' illegality.

### **The Economic Calculus: Red Tape as a Barrier to Entry**

The main cause of illegal construction is that the legal process is financially unsustainable. In Pakistan's unstable economy with inflation in double digits and interest rates (frequently over 20%) that are very high the question of time becomes the most-costly factor in construction.

**The Cost of Delay:** A builder who buys a plot for PKR 500 million with borrowed money is running an interest cost of about PKR 8,10 million per month. In case the "NOC Labyrinth" postpones the project for 24 months, the "holding cost" just by itself will be

between PKR 200,240 million, i.e. almost 50% of the land value, without any construction having taken place.

**The Rationality of Non-Compliance:** Builders are indeed rational economic agents and they decide to start building without permits as the punishment for doing so is much less expensive than the cost of waiting. Hence, when this "Cost of Compliance" (Official Fees + Holding Costs + Opportunity Costs) is compared with the "Cost of Non-Compliance" (Bribes + Potential Regularization Penalties), the calculation is on the side of illegality.

**Table 2**  
**Financial Impact of Red Tape: The "Cost of Compliance" Model**

Financial Variable	Impact of 2-Month Wait (Legal)	Impact of 24-Month Wait (Actual)
Official Approval Fees	PKR 2,500,000	PKR 2,500,000
Interest on Land Loan (20%)	PKR 16,000,000	PKR 192,000,000
Material Inflation (Avg 15%)	Negligible	+ PKR 45,000,000
Total Holding Cost	PKR 18,500,000	PKR 239,500,000
Comparison	Viable Project	Economic Loss

This table justifies why builders choose illegality by showing the bankruptcy-inducing cost of waiting.

### The "Speed Money" Economy: Complexity as a Rent-Seeking Tool

The procedural complexity in the SBCA is not a matter of chance; it is intentionally preserved to make it easier for the authorities to extract illegal payments. The keeping of the discretionary powers at the different stages of the multiple scrutiny process reruns a "Speed Money" ecosystem.

**Manufactured Objections:** The mechanism permits examination officials to raise minor technical points one after the other and not all at once. This ability to 'hold' a file without any time limit compels constructors to hire intermediaries ('agents') who discuss the terms of unrecorded payments in order to get these obstacles removed.

**The "Premium" on Efficiency:** Efficiency is not a public service but a could be bought product in such a distorted market. Those builders who do not want to bribe are met with the "Procedural Labyrinth" in all its might, while the ones who give bribes do not have to wait. The regulatory body thus changes from the one ensuring the safety to the one preying on the capital.

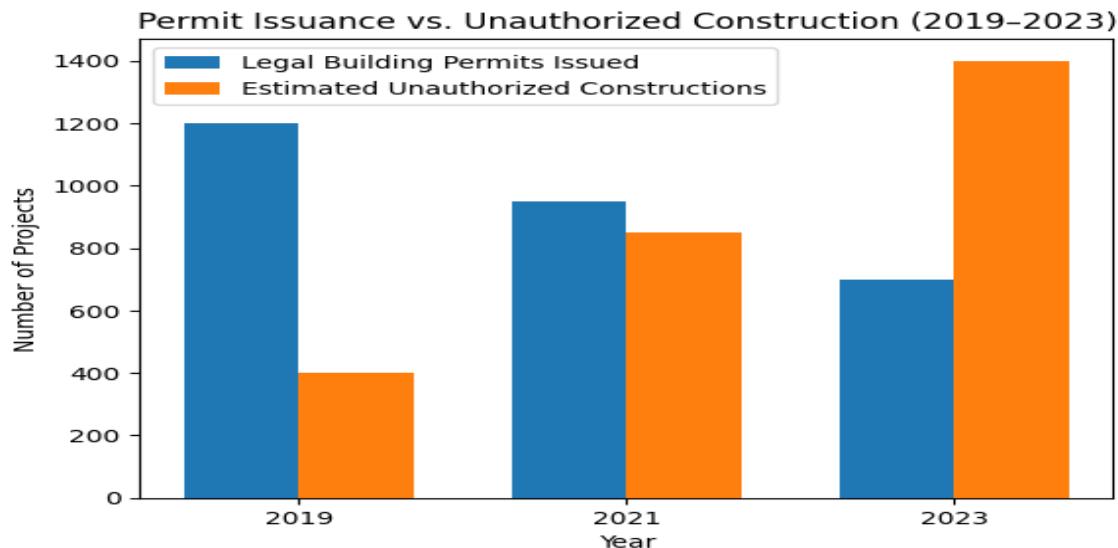


Figure 2: Building Permits Issued vs. Estimated Unauthorized Construction (2019-2024)

Source: Data derived from ABAD (2023) and Media Investigative Audits

### Operational Failure: The "Fait Accompli" Strategy

A significant failure point of the SBCA is the lack of effective Stage, Wise Inspections. Although bylaws require inspections at the foundation, plinth, and roof, casting levels, it is reported that these are seldom done physically in reality.

**The Oversight Vacuum:** Due to this absence of control, construction companies can, without fearing any consequences, change their building plans. If a developer has been given the green light to build up to four floors over the ground floor, it is very easy for him to build up to eight floors over the ground floor as there is no field engineer who visits the site during the structural phase.

**The "Fait Accompli":** When the SBCA is finally aware of the infringement, the building is finished, and third, party interests (residents who have purchased apartments) are in the picture. Builders are aware that after a building is inhabited, the cost in terms of politics and society for tearing it down becomes so high that the state is compelled to take the building for granted as a fait accompli.

### The "Regularization Trap": Institutionalizing Moral Hazard

The history of urban planning in Sindh is punctuated by frequent Amnesty Schemes and "Regularization Ordinances."

**Moral Hazard:** With the government permitting unlawful buildings to be legalized through the payment of a fine again and again, a significant moral hazard has been generated. The market has understood that pardon is possible and not too expensive. Such an anticipation weakens the power of the first authorization procedure; developers illegally erect buildings nowadays with a safe assumption of rescue next day.

**Revenue vs. Regulation:** A large moral hazard has been created as the government keeps allowing illegal buildings to be legalized by the payment of a fine. The market has comprehended that a pardon is possible and it is not too expensive. Such

a expectation diminishes the strength of the initial authorization process; developers are building illegally in the assumption that they will be saved the next day.

### **Technological Deficit: Digitization without Automation**

Finally, the failure of the "Single Window Facility" lies in its "Hybrid" nature.

**The Human Loophole:** It is worth mentioning that although the submission of the ZP, 1 form is done digitally, the decision, making process is still manual. There is no automated algorithm that verifies compliance with Floor Area Ratios or zoning regulations. Digitization does not help in reducing corruption as long as a human official is the one who has the authority to click "Approve" or "Reject" based on a subjective assessment. The malfunctioning of the system in some instances makes it impossible for true automation to exist whereby the system automatically approves plans that are in compliance based on data inputs, hence the possibility of manipulation is still there.

### **Case Law Analysis & Evidence**

Judicial pronouncements, especially from the Supreme Court of Pakistan, give a detailed account of the SBCA's failure in the whole process of building approval and the enforcement of the same. Court cases at this level frequently reveal how the rules are ignored on the ground, widespread operational negligence, and the involvement which is keeping illegal constructions going. This part, by reviewing significant court decisions, tries to substantiate the argument made in the previous section with the help of the judicial pronouncements.

### **Judicial Findings on Inspection Failures and Official Complicity**

Landmark Supreme Court judgments have repeatedly highlighted the SBCA's failure to conduct mandated stage-wise inspections, leading to the completion of fundamentally illegal structures.

**The Nasla Tower Judgment (Supreme Court of Pakistan, 2021):** This example is a very clear illustration of how the SBCA failed to function properly in terms of their operations. The Supreme Court realized that the building which had extended its structure over a piece of land that was meant for a service road was allowed to be made up to several floors without an efficient monitoring. The Court pointed out that there were absolutely no inspections at the most important stages of the construction which resulted in a situation that had already been decided when they ordered the demolition only after the building was completely finished and inhabited. The verdict accused the SBCA staff of neglecting their duties and being involved in the wrongdoing, saying that such breaches could not happen without the silent or active participation of the regulatory authorities. The Court pointed out that the neglect at the plinth, roof, and other stages was not simply an error but a severe failure of the system that was giving the builders the freedom to illegally add more floors.

**General Observations in Urban Governance Cases:** Through a multitude of instances of unlawful building in Karachi, the Supreme Court has regularly expressed its grief over the absence of an efficient system to keep watch. The Court on many occasions has found that the sanctioned plans were on record only, while the real building was going in a very different direction as the illegal floors were being added and no one from the SBCA was there to take any kind of action against the violation. The judiciary has been asking over and over again the question as to how these huge breaches can be

happening without the intervention or at least the knowledge of the officials who are supposed to be supervising the situation.

### The "Regularization Trap": Judicial Scrutiny of Amnesty Schemes

The judiciary has also critically examined the practice of regularizing illegal constructions through amnesty schemes, highlighting how such policies undermine the rule of law and incentivize future violations.

**Critique of Regularization:** On occasion, courts have permitted regularization under certain conditions so as to safeguard third, party bona fide purchasers but, on the other hand, they have very often denounced the practice as a kind of a state, sponsored system that provokes breaking the law. For example, the Nasla Tower verdict, among other things, rejected the idea of regularization of those structures that were built on illegally taken land or that unreasonably violated zoning regulations. The judiciary, in many instances, has been shocked by the fact that the state, instead of imposing its laws, facilitates the ways in which law, breakers get rewarded.

**Undermining Enforcement:** The anticipation that illicit building will be regularized sooner or later, in fact, generates a large moral hazard. Developers thus blatantly disregard the rules since they are aware that in most cases the fines are just a small portion of the illegal floors' profits and that a political pressure or a judicial intervention might lead to a solution. The court control in this respect reveals that the SBCA is ineffective in deterring and rather becoming a part of the cycle that is responsible for the continuation of the illegal activities.

### Evidence of Procedural Red Tape and Delays

Although such statements are usually indirect, the Supreme Court, in its various urban development adjudications, has often given hints about such "procedural complexities" and "bureaucratic hurdles" which developers face. The fact that a large, scale illegal construction is going on without the final approval just indicates that the formal process is either too slow, too opaque, or too expensive for most people. The repeated calls by the judiciary to make the use of land and building approvals more transparent and efficient, thus, is an implicit recognition of the failures of the current system. The analysis of case law reveals that the SBCA's local operational framework is severely malfunctioning. The judiciary, through its different pronouncements, has been indicating that due to the lack of adequate monitoring, the situation of illegal constructions has escalated to be the most significant governance failures. The repeated criticisms of the regularization schemes illustrate how state policy can be, by way of a loophole, the violation of the regulations it is supposed to control. The court's decisions here constitute an unequivocal confirmation of the statement that the procedural red tape and institutional weaknesses within the SBCA are not merely a matter of administration but, in fact, the main causes of illegal constructions in Sindh.

### Conclusion

The crisis of illegal constructions that has spread like a forest fire from the vertical sprawl of Karachi to the unregulated expansion of Hyderabad and Sukkur is not just a typical case of lawlessness and failure of enforcement agencies. This research shows that it is actually the direct and inevitable consequence of a total collapse of the regulatory system. Far from being the protector of safe urban development, the Sindh Building

Control Authority (SBCA) has, in fact, become the major cause of the informal construction sector without even knowing it. The most important finding of this policy paper is the presence of an acute "Compliance Conflict" problem. The mismatch between the statutory *de jure* timeline of 60 days and the operational *de facto* reality of 18 to 24 months has, in fact, changed the industry's construction economics at a fundamental level. In a shaky economic situation, which is characterized by high, interest land loans and inflationary pressures, time is a very important financial metric. The analysis reveals that the "Cost of Compliance" mainly due to the opportunity costs of the "NOC Labyrinth, " administrative centralization, and indefinite delays has significantly exceeded the "Cost of Non-Compliance." Therefore, builders are not only deciding to break the law; they are economically forced to do so if they want to keep their projects viable.

The failure of the "Single Window Facility" also points to a significant governance gap. The continuation of "manual scrutiny" in a system that is supposed to be digital, and the non-integration with external agencies like KWSB and SEPA, have thus kept the discretionary powers intact which allow rent-seeking and the "speed money" economy to continue. Compliant developers are practically being punished by the system with delays that can cause them to go bankrupt, while those who are willing to circumvent the regulatory framework are given a "fast track" to their projects. At the end of the day, the model of "Bureaucratic Control" as it stands has failed. The use of outdated building codes, the concentration of power in Karachi, and the lack of effective stage-wise monitoring has led to a situation where illegality is the only efficient way to get projects completed. If the SBCA does not go through a paradigm shift from manual, centralized control to automated, decentralized facilitation, the cycle of unauthorized high-rises, structural hazards, and retroactive regularization will keep on threatening the safety and the future of Sindh's urban centers. The status quo is no longer just unsustainable; it is actively destructive.

### Policy Recommendations: From Regulation to Facilitation

#### Short-Term Reform Matrix: Transparency & Data Integrity (0-6 Months)

**Focus:** Immediate systemic stabilization, digital accountability, and re-establishing the "Rule of Law."

**Table 3**  
**Transparency & Data Integrity (0-6 Months)**

Policy Action	Implementation Strategy	Primary Objective
Mandatory QR-Coded Site Boards	Deployment of scannable QR codes on every construction site, linked to a read-only public server.	Allow citizens to instantly verify approved G+X floors via smartphone, preventing "data tampering" by field staff.
Independent Third-Party Data Audits	Hiring external engineering firms to conduct "Spot Checks" on the SBCA's digital database.	Mitigate the "Digital Lie" ensuring the digital record matches ground reality and zoning laws.
Amnesty Moratorium	Formal provincial notification suspending all "Regularization" applications for structures built after Jan 2025.	End the market expectation that illegalities can be "bought off" later, restoring the deterrent value of the law.
Citizen "Red Flag" Dashboard	A digital portal for residents to upload photos of violations, monitored by an Independent Ombudsman.	Create a transparent loop for complaint handling that bypasses the specific Town Office being complained about.

Officer Integrity Grading	A performance-based grading system where promotions are linked to zero new violations in assigned zones.	Shift the incentive for field staff from "rent-seeking" to "prevention and reporting."
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### Medium-Term Reform Matrix: Structural & Legislative Integration (6-24 Months)

**Focus:** Codifying the SBCA Act 2025, dismantling the "NOC Trap," and shifting liability.

**Table 4**  
**Structural & Legislative Integration (6-24 Months)**

Policy Action	Implementation Strategy	Operational Goal
SBCA Act 2025 + Oversight Board	Passage of the Act with a mandatory 11-member Independent Board (Architects, Lawyers, Civil Society).	Criminalize building offenses while ensuring the new SBCA Enforcement Force is governed by experts, not political appointees.
Unified "NOC API" Integration	Digital "handshake" between SBCA, KWSB/WASA, SEPA, and the Board of Revenue (LARMIS).	Achieve a True Single Window where land titles are auto-verified and utility NOCs are issued via digital review within 14 days.
Professional Indemnity Insurance	Mandatory structural/zoning insurance for all Category-III and IV (High-Rise) projects.	Transfer primary liability to Architects and Engineers, effectively "privatizing" the cost of honesty and structural safety.
Risk-Based Scrutiny (RBS)	Implementation of an automated "Green Channel" for low-risk residential plots (<400 sq. yards).	Reallocate 70% of SBCA human capital to focus exclusively on high-risk, high-rise, and commercial scrutiny.
Deemed Approval Clause	Legal amendment: If a plan is not rejected with technical grounds in 60 days, it is legally approved.	Force administrative efficiency and eliminate the "indefinite delay" used to solicit speed money.

### Long-Term Reform Matrix: Regional Autonomy & AI Governance (2-10 Years)

**Focus:** Eliminating the "Karachi Bottleneck" and ensuring infrastructure-linked urban resilience.

**Table 5**  
**Regional Autonomy & AI Governance (2-10 Years)**

Policy Action	Implementation Strategy	Operational Goal
AI-Driven Satellite Monitoring	Deployment of high-resolution satellite change-detection (e.g., Sentinel/Planet API integration).	Automate the detection of unauthorized vertical or horizontal growth, removing the "human element" from violation discovery.
Full Regional Decentralization	Granting final signatory and technical authority to Directorates in Hyderabad, Sukkur, and Larkana.	Eliminate the "Karachi Bottleneck" where provincial files travel hundreds of miles for a single signature.
Infrastructure-Linked Zoning	A legal ban on commercialization in residential zones unless utility capacity (Water/Sewer) is pre-upgraded.	Solve the "Revenue-over-Regulation" trap where the state sells commercial rights that the infrastructure cannot support.
"Zero-Touch" Approval System	Fully automated, algorithm-based approval for projects meeting all GIS-mapped zoning parameters.	Remove human discretion from the "Scrutiny" phase, making the SBCA a purely monitoring and enforcement body.
Urban Resilience Codes	Complete overhaul of KBTPR 2002 to mandate solar integration, water recycling, and seismic resilience.	Align Sindh's vertical growth with Global Sustainable Development Goals (SDGs) and climate reality.

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