

2012 consultation on changes to the Building Regulations in Wales

Part L (Conservation of fuel and power)

Consultation Response Form

Your name: Shaun Reville

Organisation (if applicable): Cardiff County Council, City Development



(i) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational Personal Views

(ii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group:

Yes No

Name of group:

Local Authority Building Control

(iii) Please tick the one box that best describes your organisation:

<p>Builders/Developers:</p> <p>Builder / Main contractor: <input type="checkbox"/></p> <p>Builder/ Small builder: (extensions/repairs/maintenance, etc) <input type="checkbox"/></p> <p>Installer/ special sub-contractor <input type="checkbox"/></p> <p>Commercial developer <input type="checkbox"/></p> <p>House builder <input type="checkbox"/></p>	<p>Property Management:</p> <p>Housing association (registered social landlord) <input type="checkbox"/></p> <p>Residential landlord, private sector <input type="checkbox"/></p> <p>Commercial <input type="checkbox"/></p> <p>Public sector <input type="checkbox"/></p>
<p>Building occupier:</p> <p>Home owner <input type="checkbox"/></p> <p>Tenant (residential) <input type="checkbox"/></p> <p>Commercial Building <input type="checkbox"/></p>	<p>Building Control Bodies:</p> <p>Local authority building control <input checked="" type="checkbox"/></p> <p>Approved Inspector <input type="checkbox"/></p>
<p>Energy Sector <input type="checkbox"/></p>	<p>Fire and Rescue Authority <input type="checkbox"/></p>
<p>Designers/Engineers/Surveyors:</p> <p>Architect <input type="checkbox"/></p> <p>Civil/Structural engineer <input type="checkbox"/></p> <p>Building services engineer <input type="checkbox"/></p> <p>Surveyor <input type="checkbox"/></p>	<p>Specific Interest:</p> <p>Competent person scheme operator <input type="checkbox"/></p> <p>National representative or trade body <input type="checkbox"/></p> <p>Professional body or institution <input type="checkbox"/></p> <p>Research/ academic organisation <input type="checkbox"/></p>
<p>Manufacturer/ Supply Chain <input type="checkbox"/></p>	<p>Other (please specify)</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>

(iv) Please tick the *one* box which best describes the size of your or your organisation's business?

- Micro – typically 0 to 9 full-time or equivalent employees (incl. sole traders)
- Small – typically 10 to 49 full-time or equivalent employees
- Medium – typically 50 to 249 full-time or equivalent employees
- Large – typically 250+ full-time or equivalent employees
- None of the above (please specify)

(vi) Are you or your organisation a member of a competent person scheme?

Yes No

Name of scheme:

(vii) Would you be happy for us to contact you again in relation to this consultation?

Yes No

WG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that as a public body, the Welsh Government is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data – name and e-mail address – you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the relevant comments box.

Questions:

New homes

1. Do you agree with the Government's preference for a CO₂ saving of 40% reduction in carbon dioxide emissions compared to Part L 2010.

No change to 2010

40% CO₂ saving

25% CO₂ saving

Something else (please explain below)

Don't know

Comments

While delivering the aspirations of Wales for carbon reduction it will also help to protect the Welsh economy from the effect of rising fuel costs. It is appreciated that industry may find the changes challenging, however, it is the view of the organisation that if the targets as outlined are implemented it will mean that changes to the fabric will not be needed in the future.

Agree that by setting a 40% target reduction now, no further reduction in carbon emissions would be required on-site to meet a zero carbon policy. However, there is a concern about whether the standard of a 40% reduction is achievable by 2015.

National Planning Policy currently expects all new homes to achieve an overall minimum CSH Level 3 with higher levels for both energy efficiency and CO₂ emissions. Over the build mix it is estimated that this results in an 8% improvement of CO₂ emissions on Part L 2010. The move from an 8% to 40% is a big target.

2. Do you agree with the proposal for an 'aggregate' approach to CO₂ target setting for new homes in 2015? The CO₂ target for any individual dwelling varies depending on the ease with which the building can achieve the target, with the overall required CO₂ saving achieved when aggregated over the build mix.

Yes No Don't know

Comments

It appears to be a sensible approach to addressing the difference in the ratio of energy use in different buildings between fabric losses and internal use in different building types e.g. Flats, detached buildings etc. However, the actual build mix will need to be continually monitored and adjusted to ensure the validity of the initial assumptions.

3. Do you agree with the proposal for a compliant option based on a consistent recipe of elemental specifications for fabric, services plus an additional CO₂ saving equivalent to an amount of photovoltaic (PV). Please justify your choice.

Yes No Don't know

Comments

From industry and public feedback the consistent message is that they require certainty and ease of use which this method of demonstrating compliance will deliver. Clarity will be needed in the AD on the issue of equivalence as it is clear that the inclusion of PV is perceived as this being in some way a preferred option.

It is acknowledged that the proposals reflect a concern about the current broader approach for which Welsh and overall UK experience is so far limited. The proposals place an increased emphasis on fabric and materials. However there may be implications for overall design standards with less concentration on resource efficient layouts, as currently required by TAN 12 Design. If a 'recipe' approach is taken this may lead to developers focussing on the recipe rather than tailoring their specific development proposals to meet wider locational and site requirements.

4. The main difference between the recipes is the required system efficiency for each fuel, which is appropriate for the heating system type. By adopting this approach to different fuel types, there is no need for a separate fuel factor. Do you agree with the proposed approach?

Yes No Don't know

Comments

This approach adds certainty and again simplifies the process. Furthermore, it doesn't penalise rural geographical areas or specific build types.

5. For the CO₂ savings proposed, are the recipe specifications a sensible way of achieving them? Please justify your choice.

Yes No Don't know

Comments

This methodology will prove beneficial to all stakeholders involved in the process who are involved with the design/specification and construction phases due to the 'givens' in the recipe approach. In short it simplifies the process. An appropriate balance appears to have been achieved. However, the perceived bias toward PV should be clarified as should over reliance on the recipe where other deviations exist e.g. the provision of secondary heating which is very common either during or post construction.

6. In approaching the selection of the amount of PV to be installed on dwellings, do you prefer?

Fixed percentage of building foundation area

Proportion of gross internal floor area with a practical cap

Don't know

Comments

Fairest approach, however a clear definition of foundation area is required in the AD

7. Do you agree that the limits on design flexibility 'backstop' values for fabric elements in new homes should be changed from the current reasonable provision in the technical guidance to become mandatory?

Yes No Don't know

Comments

Currently these values cause much confusion in their application and serve little useful purpose.

8. Do you agree with the changes to the 'backstop' values proposed? Please explain your decision.

Yes No Don't know

Comments

At the current level they give the 'illusion' that the u values can be used for areas greater than intended and still achieve compliance. However, current available solutions allow for further reduction in these values.

9. Do you have any other comments on the proposed changes to Approved Document L1A or the domestic National Calculation Methodology? Please make it clear which issue each comment relates to by identifying the relevant paragraph number.

Comments

Revised Regulation 28 to appear in AD L1B to reinforce consequential improvements to domestic extensions. Appendix A to draft new L1B circulated contains old Reg 28

10. The Impact Assessment makes a number of assumptions on fabric/services/ renewables costs, new build rates, phase-in rates, learning rates, etc for new homes. Do you think these assumptions are fair and reasonable? Please justify your views.

Yes No Don't know

Comments

They appear appropriate. However it is not feasible to check the validity of all the statistics, information and assumptions used.

11. Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new homes? Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

It is not feasible to check the validity of all the statistics, information and assumptions used.

New non-domestic buildings

12. Do you agree with the proposal for 2013 for non-domestic buildings to explicitly regulate energy efficiency separately from low carbon technologies through the assessment of primary energy consumption (PEC)? Does PEC seem like a reasonable basis for standard setting?

Yes No Don't know

Comments

Low carbon technology should not excuse or compensate for poor levels of insulation in external fabric construction. Fabric first approach appears to be a logical foundation to energy efficiency in buildings. Reducing PEC should reduce offsite carbon.

13. Which package of fabric and services should be selected: 7% or 10%? Please give reasons for your choice.

7%

10%

Don't know

Comments

As with the proposal for dwellings, it is considered to be less of a burden on industry if improvement is taken in a single step. There is likely to be a resulting cost saving over the longer term.

14. Do you foresee any particular issues for certain categories of building to meet the TPEC or TER?

Yes No Don't know

Comments

Possibly some industrial & storage buildings. Innovation may be required but not considered unacheivable.

15. Which approach should be utilized to incorporate the contribution of low carbon technologies into the setting of the Target Emission Rate (TER), for non domestic buildings?

Fixed carbon reduction (in kg.CO₂/m²/year)

Percentage of roof area of PV

Other

Don't know

Please give reasons for your choice

Appears to be the most appropriate to cover all building types/forms. Does not infer that PV is the preferred technology

16. The proposals explain the Government's preference for a 20% aggregate improvement in CO₂ performance standards for new non-domestic buildings from October 2013. Which option do you prefer and why?

- | | |
|---|-------------------------------------|
| No change | <input type="checkbox"/> |
| Target A: 10% aggregate improvement (1% PV) | <input type="checkbox"/> |
| Target B: 11% aggregate improvement (No PV) | <input type="checkbox"/> |
| Target C: 20% aggregate improvement (5% PV) | <input checked="" type="checkbox"/> |
| Don't know | <input type="checkbox"/> |

Please give reasons for your choice

Non domestic buildings should be encouraged to use low carbon technology. Non domestic represents the greater capacity to improve, particularly in running emissions.

The current position for new non domestic buildings is that they are also expected to achieve a minimum carbon standard, as outlined in TAN 22. Such buildings are expected to achieve BREEAM 'Very good'. Again like CSH, the BREEAM standard currently covers more areas than just energy and provides a wider assessment of a building's overall sustainability e.g. Water, Health and well-being etc.

The suggested changes to Part L place an emphasis on a 'fabric first' approach. Although it is difficult to make a direct comparison with the energy element of the BREEAM standard, as the methods of assessment are different, it is clear that the additional areas covered by BREEAM would not be assessed, and this is a major concern.

17. Do the proposed 2013 notional buildings as set out in the changes to the National Calculation Methodology seem like a reasonable basis for standards setting? Please provide comments on the method used to develop the notional buildings and particular elements of one or more of the notional buildings, if relevant.

Yes No Don't know

Comments

A reasonable balance appears to have been achieved.

18. Do you think that a further recipe should be created for buildings under 250m² and aligned with the proposed domestic recipe? Are there particular reasons why smaller buildings find compliance with the non-domestic recipes difficult? Please justify your views.

Yes No Don't know

Comments

Having a recipe approach would be a consistent approach for these type of buildings, however, the different consumption requirements should be reflected in the recipe fabric standards. Small buildings are also unlikely to have dedicated facilities management, complex technology incorporated in such buildings may not realise the intended/designed savings.

19. Although we recognise that some buildings may need to be serviced in a particular way for legitimate functional or environmental reasons, should Part L incentivise a lower carbon servicing strategy (as with the current Energy Performance Certificate methodology), by basing the notional building on mixed-mode ventilation?

Yes No Don't know

Comments

It is considered that it would encourage natural ventilations systems; though the impact of this on buildings in high pollution areas may need further consideration.

20. Do you have any other comments on the proposed changes to Approved Document L2A or the non-domestic National Calculation Methodology? Please make it clear which issue each comment relates to by identifying the relevant paragraph number.

Comments

To ensure that the L2A aspirations are achieved the contents and guidance within the document should be as clear and unambiguous as possible for all to comprehend, including regulators who may not be from an M & E background. Care needs to be taken to ensure any opportunity for conflict on interpretation is addressed. WG should ensure sufficient training and verification of competence is available/introduced for all involved in delivering and enforcing the improvements.

21. The Impact Assessment makes a number of assumptions on the costs of fabric/services/ renewables, new build rates, etc for new non-domestic buildings. Do you think these assumptions are fair and reasonable? Please justify your views.

Yes No Don't know

Comments

It is not feasible under the consultation to verify the validity of all the assumptions used. How will these be verified/ratified post implementation?

22. Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new non-domestic buildings?

Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

It is not feasible under the consultation to verify the validity of all the assumptions and information used. How will these be verified/ratified post implementation?

Cumulative impact of policies

23. Overall, do you think the assessment of the impact on development is broadly fair and reasonable? Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

Appears to be a fair guess; given the huge differences across Wales reality may be very different.

National Planning Policy Review

24. What role should planning play in facilitating higher carbon standards? Should it focus on facilitating site wide energy opportunities that will be needed as we move towards zero or near zero carbon buildings?

Views

While flexibility is contained within guidance to enable LPA's to provide support to attain zero carbon buildings, actual practice varies widely between authorities (and officers). Focus should be concentrated on site wide opportunities with greater attention given at LDP stage. Implementation of TAN 22 reflects that there is little technical expertise within the planning process regarding the level of detail required and the impact of decisions on technical and practical build feasibility.

Planning has a significant role in delivering higher carbon standards. For example, solar gain issues, required to deliver some of the building specific targets, will require close attention to development layout detail to ensure that these can be met whilst also delivering other key issues such as security, privacy and permeability. Similarly, surface water solutions, and other non-energy specific features of CFSH and BREEM need to be considered early in the process of scheme development. There is concern that these items will be unregulated and so very difficult to influence given the intention to move away from the current system of CFSH and BREEM.

There is also a clear role in encouraging and stimulating innovative local and site wide energy solutions, but these bring risks to developers particularly in the current economic climate. If planning is to fulfil its role in relation to these issues there need to be clear and strong policies and tools to achieve these. The new system as proposed would seem to leave many of them unregulated, especially in the short term.

25. What are the implications from future (and regular) changes to the Code for Sustainable Homes and BREEAM on the implementation of the policy?

Views

Wales specific CSH and BREEAM may be required if the requirements of TAN 22 remain. The implementation of TAN 22 has been so varied across Authorities that it has delivered very little change in delivered projects to date. Only land use issues should be considered at planning stage with more flexibility given to designers as detailed plans are developed. In the current regime designers are "best guessing" to demonstrate compliance at planning stage often requiring duplication of the process at building regulations stage and subsequent changes to planning approvals.

The Consultation recognises that as well as low carbon building there are other sustainability benefits that the CSH and BREEAM standards bring such as water efficiency, materials and health and wellbeing. The Welsh Government do not want to lose these positive features that go to make up a sustainable building and will look to opportunities to secure some of the key features within future Building Regulations

However, there is a particular concern that the intention is to remove CfSH and BREEAM "at the earliest opportunity".

There needs to be further clarity about what mechanisms could be put in place to allow a local planning authority to guide and control the 'non-energy' sustainable building solutions currently assessed by CSH and BREEAM before these devices are removed from the regulatory framework..

How could these features be controlled if CSH & BREEAM are withdrawn? Which non-energy elements should be covered by national planning guidance? ?

26. Are the costs of assessment and certification now disproportionate to the costs and benefits of achieving a minimum sustainable buildings standard level?

Yes No Don't know

Comments

Assessment is undertaken at the wrong stage. Considerable expenditure is required to submit an application which may not be successful. Cost outlay can be justified post approval through the Building Regulations process. The point of diminishing returns is reached with these proposals and the bigger picture now needs addressing e.g. existing stock, embodied carbon and community/national solutions through strategic sites

27. What should be the role of local planning authorities in setting local standards above and beyond Building Regulations? How can we ensure there is a level playing field of standards across Wales?

Views

None in relation to building standards. Planning does not have the expertise or capacity to enforce on site making the DC process atick box exercise. Consistent standards should be applied nationwide through the Building Regulations

28. What do you see as the positive/negative impacts of removing Part B of the policy expecting buildings to be certified against Code/BREEAM?

Views

Greatly reduced cost on clients/developers/builders. It is considered that higher standards will actually be delivered through the Building Regulations. The planning process has a poor record on enforcement of these issues. However, the wider gains in ecology etc will be lost.

29. Is there a better, alternative, way to rewards and secure sustainable buildings (above the regulatory minimum) other than using national planning policy? What opportunities are there for future changes to Building Regulations?

Views

It is considered that there is scope for the extension of the role of Building Regulations to include such issues as construction waste and product specification on the basis of sustainability. (as per CSH & BREEAM)

30. To what extent are duplication of standard and approval systems an issue? Would the removal of the PfSB policy assist in reducing duplication?

Views

See previous observations. Greater clarity for developers/applicants of having to achieve compliance through one process.
An LPA would have to set out its priorities for sustainable development on strategic sites. Is there a need to set higher standards locally for carbon reduction given the new part L proposals by 2015? What consistent mechanism could an LPA use to apply higher broader standards of sustainability & non-carbon categories on such sites? – Is there a role for the BREEAM Communities approach or similar assessments to be incorporated into the national policy framework?
What standards should be applied to strategic sites prior to the proposed 2015 changes? Further policy guidance from WG is required.
How would this sort of control be excerpted in areas where LDP's and master planning frameworks are already agreed and where the scope for review is limited?

31. What opportunities are there for higher standards to be delivered on strategic sites identified as part of the Local Development Plan?

Views

The highest proposed standards in this consultation are challenging, additional (higher) targets on strategic sites would lead once again to confusion and may hamper inward investment.

Existing buildings

32. Do you agree with the proposal to raise performance standards for domestic replacement windows? Please explain your answer.

Yes No Don't know

Comments

Window performance should be in line with the backstop values in L1A and possibly as good as the elemental recipe value.

However, the provision of clear guidance on standards of installation to achieve adequate air tightness and the avoidance of thermal bridging will ensure energy efficiency is maximised.

33. Do you agree with the proposal to raise performance standards for domestic extensions? Please explain your answer.

Yes No Don't know

Comments

An extension is a mini new build there is no practical reason why new build standards should not be imposed. The elements should be aligned with the elemental recipe value in L1A.

Whilst there is no objection in principle to this there may be implications for buildings in Conservation Areas and for Listed buildings where a specific architectural approach or fenestration detailing may be required.

34. Do you agree with the proposal to raise performance standards for non-domestic extensions? Please explain your answer.

Yes No Don't know

Comments

As above. The element should be aligned with the elemental recipe value in L2A.

35. Do you agree that the exemption for conservatories or porches should be removed where an individual room heat or air conditioning unit is installed? How effective would this change be in limiting energy use/emissions, or are there other ways by which energy performance might be improved where conservatories or porches are installed?

Yes No Don't know

Comments

Exemption for conservatories should be removed completely. The typical use is not for which the initial exemption was based. The argument that conservatory provides thermal benefit to the dwelling is only true if the conservatory is unheated. From experience every conservatory encountered is heated, either by extension of the primary heating system or by local heating. Changes to the Sewer Adoption and Connection Process will mean that a considerable amount of these structures will be affected. The common sense approach would be to remove the exemption for the above reasons and to protect the client against litigation for failing to comply.

36. Do you agree with the proposal to require consequential improvements upon extensions or increases in habitable space in existing homes below 1000m²? Please explain your view.

Yes No Don't know

Comments

The improvements identified are a sensible and not onerous on the client. The cost will be minimal. There is a clear need to improve the existing stock and the increased cost is minimal and proportional.

37. The consultation explains that the regulatory requirement for consequential improvements upon domestic extensions or increases in habitable space would be limited to a list of measures comprising a minimum standard of loft insulation, hot water cylinder insulation and the installation of cavity wall insulation.

Do you agree with this list of measures?

Should this list be different (please explain below)?

Another approach (please explain below)

Don't know

Comments

Further options should be included and the highest possible gains achieved.

38. What effect do you think the requirements for consequential improvements may have on the demand for repair, maintenance and improvement activity? Please use evidence to explain your answer.

Increase demand

Reduce demand

No effect

Don't know

Comments

The requirements are not going to be prohibitive in terms of cost and therefore highly unlikely to repair, maintenance and improvement.

39. Do you agree with the proposal to introduce consequential improvements upon extensions or increases in habitable space in non-domestic buildings under 1000m²? Please explain your view.

Yes No Don't know

Comments

As 36

40. The consultation proposes that for non-domestic buildings, any measure from list which is used to generate Green Deal assessments, the list in SBEM used to generate Energy Performance Certificate recommendations and the existing list of typical consequential improvement measures from Approved Document L2B should be eligible to be a consequential improvement. Do you agree?

Yes

No

Prefer a different list (please specify)

Don't know

Comments

All appear relevant

41. Do you agree that there should not be major problems in extending the requirement for consequential improvements for the building control process? If you do foresee issues, what are they and how might these be addressed?

Yes No Don't know

Comments

Though it is likely that there will be an impact on the Building Regulations charges as additional inspection will be required. It will be essential that all BCBs ensure compliance is achieved or it likely that it will be another opportunity for marketing on the basis of not requiring compliance.

42. Do you have any other comments on the proposed changes to Approved Document L1B? Please make it clear which issue each comment relates to by identifying the relevant paragraph number.

Comments

We are still experiencing difficulties with awareness in relation to Renovation of Thermal Elements that came in during 2006. WG should have publicity campaign for proposed changes (for general public and SME builders etc).

43. Do you have any other comments on the proposed changes to Approved Document L2B? Please make it clear which issue each comment relates to by identifying the relevant paragraph number.

Comments

None

44. Do you think that the Impact Assessment is a fair and reasonable assessment of the potential costs and benefits of raising the performance standards for replacement domestic windows and domestic/non-domestic extensions? Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

As previous RIA comments

45. Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for consequential improvements in existing homes? Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

As previous RIA comments

46. Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for consequential improvements in existing non-domestic buildings? Please justify your view and provide alternative evidence if necessary.

Yes No Don't know

Comments

As previous RIA comments

Compliance and Performance

47. For new dwellings, Welsh Government is proposing to develop a compliance checklist. Do you think such a checklist would be used sufficiently to warrant its development?

Yes No Don't know

Comments

A compliance checklist is considered a useful tool and therefore warrants further development. However, it must not become a developer self certification get out of jail tick box tool. Evidence based approach with building control body verification would be necessary.

48. If such a checklist was developed, what should it cover?

Comments

Similar to existing builders submission compliance check sheet e.g. Fabric, thermal bridging, heating controls, low carbon technology, end user guide, (SAP entries) and be prescriptive and definitive about the evidence required to support its claims and its independent verification.

49. If the checklist was taken forward, who should be involved in its development?

Comments

Designers, Contractors, BCBs and BRE

50. Would any other approach be likely to prove more effective instead (such as a PAS¹ type approach).

Yes No Don't know

Comments

The PAS would need to be too generic. Although it may be helpful if there was a requirement for the designer to produce a checklist for their design as a site guide (as part of the Building Regulations application process). Verification should be on post construction evidence not 'promise' of using design stage PAS.

- 51a. Would it be preferable for buildings of a domestic nature to be able to achieve compliance through applying the recipe in AD L1A, in acknowledgement of the domestic nature of such buildings, rather than demonstrating compliance with AD L2A?

Yes No Don't know

Comments

This methodology will prove beneficial to all stakeholders involved in the process who are involved with the design/specification and construction phases due to the 'givens' in the recipe approach. In short it simplifies the process.

- 51b. What are the arguments for and against this approach?

Comments

Ease of implementation, reduced burden on industry, cost effective
 Maybe considered prescriptive and impede innovation in design flexibility and technological advances.

52. Additional views and suggestions for addressing compliance and performance issues in new non domestic buildings would be welcome.

Comments

Greater powers of enforcement as being considered in England. e.g. stop notices etc. More emphasis on site inspection verification and as built evidence is required. Proof of adequate training and information to trades/operatives is required (certification to use/install). Manufacturer responsibility to train and educate on installing their products and post installation checking – responsibility need not stop at the factory gate.
 BCB minimum mandatory Part L checking and inspection regime to ensure consistency.

¹ A PAS is a Publicly Available Specification, and the PAS would set out a quality assurance approach.

53. Is the newly formatted ADL1B easier to understand and use?

Yes No Don't know

Comments

More pictures/diagrams required

54. Are there any further amendments to the newly formatted ADL1B that you would recommend? If so, please provide details.

Yes No Don't know

Comments

Improved definition, for example, what constitutes a conservatory in terms of proportion of glazing? (If exemption remains!)
Definition of foundation area required.

55. How do the consultation proposals impact on the work of Local Authorities and Approved Inspectors? Please give positive and negative impacts.

Comments

The proposals appear to simplify the process in many areas and make it easier to determine compliance which in effect will reduce carbon emissions. However other aspects such as consequential improvements are likely to add some burden.

56. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Please enter here:

[Empty text box for reporting related issues]

Responses to consultations may be made public – on the internet or in a report. If you would prefer your response to be kept confidential, please tick here: