

2012 consultation on changes to the Building Regulations in Wales

Part L (Conservation of fuel and power)

Consultation Response Form

Your name: Kayna Tregay

Organisation (if applicable): Environment Agency Wales



(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:

N/A

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

Builders/Developers:	Property Management:
Builder / Main contractor: <input type="checkbox"/>	Housing association (registered social landlord) <input type="checkbox"/>
Builder/ Small builder: (extensions/repairs/maintenance, etc) <input type="checkbox"/>	Residential landlord, private sector <input type="checkbox"/>
Installer/ special sub-contractor <input type="checkbox"/>	Commercial <input type="checkbox"/>
Commercial developer <input type="checkbox"/>	Public sector <input type="checkbox"/>
House builder <input type="checkbox"/>	

<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 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 <i>(please specify)</i></p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p>Environment Agency Wales – Welsh Government Sponsored Body</p> </div>
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(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

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

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

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

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

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

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

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

Yes No Don't know

Comments

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

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

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

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

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

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

Yes No Don't know

Comments

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

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

Target A: 10% aggregate improvement (1% PV)

Target B: 11% aggregate improvement (No PV)

Target C: 20% aggregate improvement (5% PV)

Don't know

Please give reasons for your choice

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

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

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

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

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

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

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

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

Planning has a key role in building and site design, layout and construction.

We believe that planning has a role in reducing energy demand and facilitating the most appropriate low carbon energy technology, as suggested in the question, as long as proposed technologies are located in the most appropriate location. Where possible and appropriate, planning should play a role in promoting the co-location of certain land uses. For example, Combined Heat and Power (CHP) plants should be located close to existing or proposed heat receptors, as is currently encouraged by TAN12 (Design).

However, planning should not focus solely on 'site wide energy opportunities'. As recognised in paragraph 109 of the consultation document, delivering sustainable development involves wider considerations, including water efficiency, sustainable drainage and waste. We expand on this point in our response to Question 28.

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

We believe that too many future changes to the Code for Sustainable Homes and BREEAM will result in uncertainty and additional expense, as manufacturers of fittings would have to adapt their products more than once in order to comply with changing standards. We therefore support Welsh Government's commitment to set a 40% reduction in carbon emissions compared to Part L 2010 now, rather than to introduce an intermediate step of a 25% reduction. This will provide certainty for developers and manufacturers of fittings.

However, it is also important that policy and its implementation needs to be easily reviewed and flexible. For example, new research or the need to adapt to climate change may require changes to sustainable buildings policy at some point in the future. If possible, the potential for future adaptation should be incorporated into changes at this point in time, as we discuss in our answer to Question 29.

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

The process to enable achievement of minimum standards should be as straightforward as possible. However, assessment should still be required to ensure that buildings are achieving minimum standards.

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

Local Planning Authorities should consider and address issues such as energy efficiency, carbon reduction and water management in their Local Development Plans (LDPs) in partnership with neighbouring LPAs. Higher local standards should be set where: opportunities arise (for example, making use of CHP potential); and where there is need (for example, in water stressed areas). This could be within or between LPA areas. This may mean that some LPAs set higher standards than others, as issues and opportunities will vary from place to place. However, LPAs need to base local standards on the same level of information and similar methodologies. This would result in a consistency of approach.

...continued

Question 31 seeks views on applying higher standards to strategic sites. As we set out in our response to that question, we support this. However, we believe that the application of higher standards need not be limited to strategic sites. Higher standards could also apply to the whole of a LPA, where there is evidence to support such an approach.

Similarly, development pressures in one part of a catchment can have significant implications for development opportunities elsewhere, and this may not be within the LPA area. LPAs therefore need to consider issues at the wider than local scale when setting standards. In the case of proposed development not in accordance with the LPA's statutory Development Plan, developers will need to clearly demonstrate that their proposal does not have any unintended consequences for other future development within or outside the LPA area, socially, environmentally and economically.

Recommendation: All LPAs should use the same baseline information as each other as evidence for their LDPs. This will help to ensure standards are set in response to the best available information.

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

Negative Implications

The removal of Part B of the policy expecting buildings to be certified against the Code/ BREEAM will have the following negative implications:

- a) **Potential for a reduction in standards:** We believe that there is a risk that some standards currently required through the Code for Sustainable Homes (the Code) and BREEAM, but not included in Part L of the Building Regulations, will be lowered. This is because the Code covers more than just fuel and power. For example, the Code Level 3 currently requires a predicted average household water consumption of 105 litres/ person/ day (Annex B, Category 2, page 31). Building Regulations Part G (Sanitation, Hot Water Safety and Water Efficiency), which developers will revert to, sets an equivalent standard of 125 litres/ person/ day (Requirement G2 and Regulation 36).

The removal from planning policy of the requirements in the Code will result in lower standards for water efficiency. This will lead to water use in houses increasing.

....continued

Pumping, heating and treating water uses energy. Water related activities contribute to 6% of the UK's annual carbon emissions. The significant proportion of this (~5%) energy is associated with water consumption as a result of heating hot water in the home (source: Quantifying the energy and carbon effects of water saving. Environment Agency and Energy Saving Trust, April). Therefore, water efficiency will support a low carbon agenda. It will be more costly to retrofit homes with water efficient devices in the future, than to maintain higher standards today. Therefore, policy should ensure water efficiency measures should be incorporated into building design today, in order to save money in the future and in order to avoid increased future carbon emissions.

- b) **Potential loss of the role of planning in sustainable building design and layout:** We disagree with line 155 (page 49) of the Regulatory Impact Assessment which states, *"The policy is not expected to have any impact on water quality or quantity, biodiversity, waste management, noise pollution or the appearance of the landscape"*. We believe that removing the requirement for BREEAM and Code compliance could result in both LPAs and developers failing to consider 'wider aspects' of sustainable building design and layout, such as water efficiency, appropriate drainage (including the potential for sustainable drainage systems (SuDS)), maximisation of natural heat and light and the design of waste disposal measures. These aspects could affect the design, layout and orientation of buildings.

Paragraph 2.9.1 of TAN12 (Design) acknowledges that planning and Building Regulations have separate, but complementary roles. We agree with this. If wider sustainability issues are not considered at the planning stage, it is unlikely that developers will be willing to consider them at building regulations stage, once planning permission has been granted. As a result, future users of a site may have increased bills. For example, heating bills may be increased if buildings are not orientated to take advantage of passive solar gain (i.e. buildings being orientated in a way that maximises the heat of the sun) regardless of the standard of fittings in a home. So even if someone buying a house saves money initially as a result of sustainable design being omitted, the lifetime running costs of the home may amount to more than this saving.

Recommendation: Welsh Government could delay the removal of the requirement to comply with the Code and BREEAM until the issues contained in the Code and BREEAM are fully encompassed within other parts of the building regulations at or above existing standards. For example, Part G on Sanitation, Hot Water Safety and Water Efficiency would need to be updated to maintain the standard of water efficiency currently set out in the Code. ...cont.

Recommendation: Welsh Government could strengthen the requirement of Design and Access Statements (DAS) (currently contained in Appendix 3, paragraph 3.2 of TAN12 (Design)) to further incorporate sustainable buildings issues. The DAS could be required to demonstrate more fully how the applicant has considered drainage, resource efficiency and carbon reduction in layout, design and materials of the scheme. In order for this to address the potential reduction in standards which we refer to above, specific standards for sustainable buildings would need to be set in the requirements for the DAS.

Recommendation: We believe that it would be useful if Welsh Government produced a comparison chart outlining which sustainable buildings issues are required in the Code and BREEAM, which issues are already picked up by existing building regulations and which are 'left over'. This would allow Welsh Government to see if removing the requirement to comply with the Code and BREEAM will have any unintended consequences that need to be resolved quickly or delivered by new legislation.

Positive impact

We believe that a positive outcome of removing Part B of the policy expecting buildings to be certified against the Code/BREEAM is the ability to move towards a fittings based approach, or 'elemental recipe' as it is referred to on page 149 of the consultation. We support this. We believe this will be simpler and more effective for developers to understand.

29. Is there a better, alternative, way to reward 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

Alternative ways to reward and secure sustainable buildings

We believe that future changes to the Building Regulations should be combined with other methods of rewarding and securing sustainable buildings, for example, via voluntary approaches.

For example, the Scottish Government has published non-compulsory sustainability guidance to be incorporated into future revision of building regulations. In their reforms Scotland have introduced a 'Silver' standard of performance, and 'Gold' standard of performance. This replicates the good and best practice levels written into the AECB (Association for Environment Conscious Building) standards and the WRAP guidance on non-domestic water efficiency. These fittings based approaches have a range of benefits compared to the current per capita approach.

...continued

Recommendation: Lessons learnt from the Scottish approach may be applicable in Wales.

In partnership with the Energy Saving Trust (EST) we have identified significant benefits from increasing water efficiency in new buildings. We believe that this could be effectively developed into voluntary sustainability guidance, followed by changes to Part G of the devolved building regulations which covers water efficiency.

We also refer you to our comments made in response to the Welsh Government's recent consultation on the Housing Bill White Paper (WG15346). We summarise three of our key relevant recommendations below. Please see our full response to Welsh Government dated 15 August 2012 for more details and evidence.

1. **Changes to the Welsh Housing Quality Standard:**
Changes to the Welsh Housing Quality Standard (WHQS) would be an effective way to improve the sustainability of buildings. We advise that water efficiency, flood resilience and Water Sensitive Urban Design (WSUD) should be incorporated into the WHQS or any other new standard for accommodation.
2. **Proposed Duty to Co-operate (Housing Associations):**
The Welsh Government's proposed Duty to Co-operate for housing associations should include a duty to co-operate on producing standards, sustainable procurement and sharing best practice on WSUD. It should also require housing associations to co-operate with water companies on producing standards for WSUD.

Recommendation: Welsh Government implement these suggestions as part of their wider work on sustainable buildings.

Opportunities for future changes to Building Regulations

It is likely that issues such as water shortages, summer overheating and flooding are likely to get more severe as the climate changes in the future. It is therefore important to build in the potential for future adaptation to the effects of climate change into Building Regulations. This should be done once, in order to reduce uncertainty for developers and manufacturers. For example, ventilation windows or ducts should be located higher up on buildings, so that any potential flood water does not reach them.

Recommendation: Standards set by current and future changes to Building Regulations should incorporate the potential for future adaptation to climate change.

...continued

We welcome the fittings-based 'elemental recipe' approach that Welsh Government has taken for this review of the Part L of the Building Regulations. If Part G of the Building Regulations (Sanitation, Hot Water Safety and Water Efficiency) is to be reviewed, we would welcome a similar approach being taken for the water efficiency elements.

Recommendation: A fittings based water efficiency standard should be incorporated into any review of Part G of the Building Regulations.

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

As we discussed in our response to Question 28, we do not consider that all the standards required via the Code and those required via planning policy to be duplicates, because they cover different aspects. Standards and approval systems should be mutually supportive.

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

Views

As we discussed in our response to Question 27, higher standards should be delivered where opportunities arise and/ or where there is need. We agree with the suggestion that there should be an emphasis on masterplanning for strategic sites through the LDP (as set out in paragraph 108 of the consultation). However, since it is unrealistic to believe that all sites will be delivered through this route, there may be local issues (such as water shortages) that necessitate higher standards across a whole LPA area. Therefore, policy should not rely solely on higher standards for strategic sites. The majority of developments in Wales are likely to be small scale and many may not be allocated in the LDP. Therefore, it is important that sustainable buildings issues can still be dealt with at the planning application stage, not just through site allocations in the LDP. Paragraph 4.11.8 of Planning Policy Wales (PPW) encourages setting higher standards for strategic sites, but this could be extended to cover other sites where there is need.

Recommendation: We recommend the retention of the paragraph 4.11.5 of PPW or, at least, the principles contained within it. We recommend that the policy also encourage the setting of higher standards for non-strategic sites where there is need or opportunity.

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

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

Yes No Don't know

Comments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comments

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

Comments

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

Yes No Don't know

Comments

- 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

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

Comments

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

Comments

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

Comments

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

Yes No Don't know

Comments

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

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

Comments

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:

Recommendation: Welsh Government could amend TAN12 (Design) to ensure that developers understand the implications of Building Regulations requirements at the design stage of their development. This will help those developers who fail to consider the planning and Building Regulations requirements separately.

Whilst we support the 'elemental recipe' approach, the review of the Building Regulations needs to take a whole supply chain approach. It is important that manufacturers of building fabric and fittings are aware of the proposed changes. Manufacturers should be encouraged to design products that will continue to function under the proposed changes in standards. For example, some boilers do not function under low water flow rates. This could mean that future changes to Building Regulations for one type of fitting will result in the need for changes to the design of other fittings.

Recommendation: Welsh Government should make manufacturers of fittings and fixtures across the whole supply chain aware of the proposals for a 40% improvement in energy efficiency. The proposed changes should result in a single change for manufacturers and developers, rather than multiple changes. This will help ensure a cheaper and more efficient way of supplying housing materials.

Recommendation: It will be important to take a holistic approach when reviewing Building Regulations. This will help ensure that the proposed changes to Part L still enable proposed changes to other parts of the Building Regulations in the future.

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: