

Building Regulations Sustainability Review Consultation Response Form

Section 1: About you

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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please indicate here by putting a cross (X) in the box:

To help us analyse the responses, please put a cross (X) in the relevant boxes:

Sector you are representing:	Building Control Bodies	X
	House Builder	
	Designer / Engineer / Surveyor	
	Builder / Contractor	
	Commercial Developer	
	Individual respondent	
	Water Company	
	Acoustician	
	Police	
	Property Management	
	Manufacturer / supply chain	
Other (if other, please specify here): Professional Bodies	x	

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Section 2: Your response

Please respond in the space below the relevant question. You may choose to respond to some or all of the questions.

Question 1

Do you consider that there is a need for greater guidance for Building Control Officers in relation to the testing regime on sites where Pre-Completion Testing is the preferred method of compliance particularly on choice of dwellings to be tested?

Yes	X
No	

Comments

Yes it would be useful; in reality this is often dictated by the scheme and phasing of properties.

Question 2

In light of the analysis undertaken, do you have any comments relating to the decision not to amend Part E of the Building Regulations?

Yes	
No	X

Comments

Anecdotal evidence would support the view, most design above the standards in any case.

Question 3

Do you agree that the proposed maximum limit of 110 litres per person per day is acceptable?

Yes	X
No	

Comments

Seems sensible to try and improve the limits, again anecdotal evidence for Code for Sustainable Homes assessments confirms this standard is generally adopted.

Question 4

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Do you consider that Options 1 to 4 are viable?

Yes	X
No	

If NO, which options do you consider are not viable and why?

Not applicable.

Question 5

Do you think that any other alternative maximum performance level standard could be proposed?

Yes	
No	X

Comments

Not at this current time.

Question 6

Do you agree with the performance standards detailed in tables 3.1, 3.2, 3.3 and 3.4?

Yes	X
No	

Comments

No additional comments.

Question 7

Do you agree that the component types which have been included for within the fittings approach are appropriate?

Yes	X
No	

Comments

No additional comments.

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Question 8

Do you consider that the water calculator and fittings approach provide a flexible route to compliance with the building regulations?

Yes	X
No	

Comments
We believe that they will be particularly useful for SMEs.

Question 9

Do you agree that the fixed factor of 5 litres per person per day for external water usage is removed from the water calculator for dwellings incorporating a rainwater storage unit?

Yes	X
No	

Comments
No additional comments.

Question 10

Do you agree that a minimum 100 litres capacity be required before removal of the fixed factor from the water calculator?

Yes	X
No	

Comments
No additional comments.

Question 15

Do you agree with the proposal not to introduce further water efficiency requirements (i.e. further than the existing 125l/p/d requirement) for buildings undergoing a material change of use?

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Yes	X
No	

Comments

No additional comments.

Question 16

Do you agree with the Welsh Government's approach of not regulating water quality and efficiency for replacement fittings?

Yes	X
No	

Comments

No additional comments.

Question 17

Do you foresee any additional compliance and performance issues which may arise from the introduction of enhanced water efficiency standards for new dwellings?

Yes	
No	X

Comments

No additional comments.

Question 18

Do you foresee any additional compliance and performance issues which may arise from the introduction of water efficiency regulation for new non-domestic buildings?

Yes	
No	X

Comments

No additional comments.

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Question 20

With the recent changes in England in relation to residential security, current Scottish standards and Secured by Design National Building Approval, do you think it is sufficient for the Welsh Government to provide guidance for residential security and not introduce a mandatory standard?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comments

We should be consistent with England although further impact analysis from England would be useful for assessing its value longer-term.

Question 21

With the year on year decreases in domestic burglary do you agree that there is a need for a mandatory security standard for windows and doors for new dwellings in Wales?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

Consistency with England.

Question 22

Do you agree that introducing a mandatory standard through building regulations is the best option?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

Although potential to consider some form of CPS scheme.

Question 23

If there is no need for a mandatory standard, what difficulties do you think will be faced by house builders in differing standards across England and Wales?

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Comments

As outlined in the proposal, there is a danger that Wales would have a lesser standard. Additionally house builders would be working to different standards. However, once existing stock has depleted the larger house builders may well drive up the standards in any case through consistent designs on all properties.

Question 24

Introducing lighting to the mandatory standard goes further than what is currently required in the rest of the UK. Do you agree with including lighting as part of the mandatory standard?

Yes	X
No	

Comments

No additional comments.

Question 26

Do you agree that market forces for new build will inform the replacement market and encourage manufacturers to start to develop the changes in their product developments and specifications for residential security?

Yes	X
No	

Comments

No additional comments.

Question 27

What are your views on the practicality of regulating the replacement windows and doors sector for security standards in existing dwellings.

Comments

Further consultation from industry expertise required.

Question 28

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Do you agree there is a need to regulate security standards in the replacement market?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

Comments

Again, further consultation from industry expertise is required.

Question 29

Do you agree that there is a need for SMEs to provide more information to the end user for domestic properties?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

Traditionally this is always an issue at completion stage.

Question 30

Do you agree that an advisory route, as opposed to regulation, would be the best option to encourage the provision of information to the end user?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

It would be resource heavy if implemented as regulation.

Question 31

Do you agree that the creation of a template guide would help SMEs and improve the consistency and quality of information provided to the end user?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

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We agree that that this would be an excellent idea and would benefit SMEs.

Question 32

Do you agree with the topics highlighted in paragraph 5.8.1 should be included within any potential Home User Guide template? If not, please explain why in the comments section below.

Yes	X
No	

Comments

As it is only a guide, all topics should be included.

Question 33

Do you agree with the Welsh Government's position that due to the wide variety of size and uses of non-domestic buildings, generating a BUG template would not be feasible?

Yes	X
No	

Comments

No additional comments.

Question 34

Do you agree with the Welsh Government's position that there is already enough information provided to the end user for non-domestic building?

Yes	X
No	

Comments

We agree that there is already enough information on this subject.

Question 35

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Do you believe that BIM could potentially provide a solution to the issue of providing information for the end user?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

We agree that BIM could potentially be used as a solution. However, it must be in line with current legislation in England and the correct information and guidance must be offered to assist all businesses, regardless of size.

Question 36

Do you believe the labelling of construction products based on LCA data should be mandatory? Please explain why if you do not.

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comments

Consistency or harmonisation is an issue at this point in time.

Question 37

In your experience, do the commercial benefits of offering an EPD outweigh the cost of performing a life-cycle assessment?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comments

Not consistent or harmonise.

Question 38

Are you aware of concrete improvements brought to a manufacturer's supply chain following a life cycle assessment?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

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Comments

No additional comments.

Question 39

Were you fully aware of the limitations associated with life-cycle assessment before reading this review?

Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>

Comments

No additional comments.

Question 40

Do you believe there is a need to research, quantify and improve the accuracy of the results of a life-cycle assessment?

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comments

Many benefits and indeed costs of investment in the built environment are not fully researched or understood. While numerous economic and social externalities are accounted for, particularly in public investment projects, many remain unseen or ignored. Certainly much of the value generated by improvement to the built environment is not captured by the promoters. Projects often go ahead only if they make financial sense to the promoter and not on the basis of the total net value they create over their lifetime.

The understanding gained from looking in more depth and more broadly at the impact of buildings and infrastructure and the value generated, or indeed the costs borne, would shine a light on potential opportunities to unlock value that otherwise would be missed.

The CIOB believes this suggests, in the first instance, greater use of post-occupancy evaluation of buildings and infrastructure. And CIOB recommends that, where possible, the assessments should examine not just the performance of the building or infrastructure itself across a wide range of measures, but the wider benefits and costs generated by its construction and occupation. This would provide a far greater understanding and a portfolio of information on what works.

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Question 41

If answered Yes to question 40, what role might government (Wales or UK) take in the promotion and sponsoring of such research?

Comments

Government (UK-wide) could seek to promote, through incentives, 'clusters' of construction-related businesses in key regions, each to act as a hub for excellence. The likes of Innovate UK could seek to carry out much of this funding.

Question 43

Do you believe that environmental impact of new buildings compared to that of refurbishments is a consideration in decisions to build?

Yes	X
No	

Comments

No additional comments.

Question 45

Do you agree that, at this time, it is not practical to introduce responsible sourcing regulations for Wales?

Yes	X
No	

Comments

Too onerous to complete especially for SMEs
Cost versus benefit
Unaware of requirements, need upskilling

Question 46

What in your view are the biggest barriers to introducing responsible sourcing regulations for Wales?

Comments

As above.

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Question 47

Do you agree that, at present, many SMEs would find it difficult to comply with responsible sourcing regulations if they were produced? Would regulation disadvantage smaller SMEs?

Yes	X
No	

Comments

As above.

Question 50

Do you agree that scaling back responsible sourcing requirements for SMEs would make creating new regulations more practical?

Yes	X
No	

Comments

We agree that it would, however it has the potential to create a 'two-tier system' which is not ideal given the construction industry already suffers from high levels of fragmentation.

Question 51

In terms of market competitiveness within the industry, do you feel the approach outlined above would reduce the gap between large and small companies, or shift the disadvantages to the larger companies?

Yes	X
No	

Comments

No additional comments.

Question 52

To the best of your knowledge, do you feel there is too much 'red tape' which can interfere with achieving responsible sourcing certification?

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Yes	X
No	

Comments

At this point in time, however we do need to continue to strive forward.

Question 53

In your opinion, could major building suppliers and manufacturers do more to promote the use of responsibly sourced materials?

Yes	X
No	

Comments

No additional comments.

Question 54

Please set out any additional comments you have below.

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