

Consultation Response Form

Building Regulations Part L & F Review – Stage 2B

Changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for non-domestic buildings and mitigating overheating in new residential buildings

This consultation is aimed primarily at firms, individuals and their representative bodies within construction and construction-related industries and the building control bodies that enable the building control system to operate. Specific elements may be of interest to members of the public.

This document is the final stage of a three-part consultation about proposed changes to the Building Regulations. The stage 1 consultation ran between December 2019 and March 2020. Stage 2A ran between November 2020 and February 2021.

You can email your response to the questions in this consultation to:

enquiries.brconstruction@gov.wales

If you are responding in writing, please make it clear which consultation and which questions you are responding to:

Building Regulations Part L/F Review – Stage 2B

Written responses should be sent to:

Building Regulations, Welsh Government, Cathays Park, Cardiff, CF10 3NQ.

If you have any queries on this consultation, please email:

enquiries.brconstruction@gov.wales or telephone: 0300 062 8144.

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

CONSULTATION FORM

Amendments to statutory guidance	
Date:	
Your Name:	Elinor Weekley
Your Position <i>(if applicable)</i> :	Director
Your Organisation <i>(if applicable)</i> :	Royal Society of Architects in Wales (RSAW)
Email / Telephone Number:	rsaw@riba.org
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Type of Organisation: Choose one of the following:	Select one
Builder / Developer	
Small/medium builder	
Volume house builder	
Designer / Engineer /Surveyor	
Local Authority	
Building Control Approved Inspector	
Architect	
Manufacturer/supply chain	
Energy Assessor	
Energy sector	
Construction professional	
Property Manager / Housing Association / Landlord	
Building Occupier/ Resident	
Other interested party (please specify)	Professional body

Question 1

Our aim is that buildings constructed to the Part L 2025 Standard will be capable of becoming carbon neutral over time as the electricity grid and heat networks decarbonise.
Do you agree that the outline of the 2025 Standard in this chapter meets this aim?

a. Yes

X

b. No

c. Unsure

Please explain your reasoning and provide supporting evidence or alternative suggestions.

Yes, but we disagree with the premise of the question. If the grid and heat networks become zero carbon in time, then the buildings they service become de facto zero carbon in operation.

We feel that the statements made at 2.3.18 are a better reflection of the stated aims of the 2025 Standard.

Question 2

We believe that developers will typically deploy heat pumps and heat networks to deliver the low carbon heating requirement of the Part L 2025 Standard where practical. What are your views on this and in what circumstances should other low carbon technologies, such as direct electric heating or hydrogen, be used?

We agree and feel that further encouragement should be given for other products and technologies to help achieve the stated aims of the 2025 Standard.

The question states “that developers will typically deploy heat pumps and heat networks to deliver the low carbon heating requirement of the Part L 2025 Standard *where practical*.” We would like to know what would happen where this was not practical?

Question 3

Do you agree that some non-domestic building types are more suitable for low carbon heating and hot water, and that some non-domestic building types are more challenging?

a. Yes

X

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 4

Do you agree with the allocation of building types to space and water heating demand types, as presented in Table 2.1 of this consultation document?

a. Yes

b. No

c. Unsure

X

If you answered no, please explain your reasoning, including how different building types should be allocated.

We agree in principle with the categorisation, but we would urge flexibility if a proposed building does not conform to the characteristics of its typical building type. For example, some industrial process buildings may have a heating demand suitable for heat pumps and a hot water demand suitable for point-of-use or heat pump. In this example, we feel it should be possible for the building to be classed as type 1 even though its building type should be type 3.

Question 5

Do you think the Part L 2025 Standard should introduce low carbon space *heating* for buildings with Type 1 or Type 2 demand (buildings that have space heating demand more suitable for heat pumps)?

a. Yes in 2025 – our proposed date

X

b. No – Another date (please specify)

c. Unsure

Please explain your reasoning.

Question 6

Do you think the Part L 2025 Standard should introduce low carbon space *heating* for buildings with Type 3 demand (buildings that have space heating demand less suitable for heat pumps)?

a. Yes in 2025

X

b. No – Another date (please specify)

c. Unsure

Please explain your reasoning.

Question 7

Do you think the Part L 2025 Standard should introduce low carbon water <i>heating</i> for buildings with Type 1 or Type 3 demand (buildings that have water heating demand more suitable for point-of-use heaters or heat pumps)?	
a. Yes in 2025 – our proposed date	<input checked="" type="checkbox"/>
b. No – Another date (please specify)	
c. Unsure	
Please explain your reasoning.	

Question 8

Do you think the Part L 2025 Standard should introduce low carbon water <i>heating</i> for buildings with Type 2 demand (buildings that have water heating demand less suitable for point-of-use heaters or heat pumps)?	
a. Yes in 2025	<input checked="" type="checkbox"/>
b. No – Another date (please specify)	
c. Unsure	
Please explain your reasoning.	

Question 9

We would welcome any further suggestions, beyond those provided in this consultation, for improving the modelling process; Part L and Part F compliance; and the actual energy performance of non-domestic buildings. Please provide related evidence.

Question 10

What level of uplift to the energy efficiency standards for non-domestic buildings in the Building Regulations should be introduced in 2021?	
a. Option 1 – average 18% CO ₂ reduction	
b. Option 2 – average 28% CO ₂ reduction (this is the Government’s preferred option)	
c. No change	
d. Other level of uplift (please specify)	
e. Unsure	
Please explain your reasoning and provide supporting evidence or alternative suggestions where applicable.	

Question 11

Do you agree with the way that we are proposing to apply primary energy as the principal performance metric?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning.	

Question 12

Do you agree with using CO2 as the secondary performance metric?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning.	

Question 13

Do you agree with the approach to calculating CO2 and primary energy factors, referred to in paragraph 3.5.7 of this consultation document?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide supporting evidence or alternative suggestions.	

Question 14

Do you agree with the proposals for natural gas being assigned as the heating fuel for any fuels with a worse CO2 emission factor than natural gas?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide supporting evidence or alternative suggestions.	

Question 15

Do you agree with our proposal of using a natural gas heating system in the notional building when electricity is specified as a heating fuel?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide supporting evidence or alternative suggestions.	

Question 16

Do you agree with the proposal for the treatment of domestic hot water in the notional building?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	

Question 17

Do you agree with the proposals for the details of the district heating system for the notional building described when connecting to an existing heat network, as presented in the draft NCM modelling guide?	
a. Yes	
b. No, they give too much of an advantage to heat networks	
c. No, they do not give enough of an advantage to heat networks	
d. No, I disagree for another reason	
e. Unsure	
If you answered no (b, c or d), please explain your reasoning and provide supporting evidence or alternative suggestions.	

Question 18

Do you agree with the proposal for connecting to a new heat network, as presented above?

a. Yes

b. No, they give too much of an advantage to heat networks

c. No, they do not give enough of an advantage to heat networks

d. No, I disagree for another reason

e. Unsure

If you answered no (b, c or d), please explain your reasoning and provide supporting evidence or alternative suggestions.

Question 19

Do you agree with the proposed changes to the National Calculation Methodology Modelling Guide and activity database?

a. Yes

b. Yes, but additional changes should be made

c. No

d. Unsure

If you answered b or c, please explain your reasoning and provide alternative suggestions.

Question 20

We would welcome any further suggestions for revising the outputs from SBEM, which would enable easier checking by building control on building completion. Please provide related evidence.

Question 21

Do you agree with the proposals for limiting heat gains in non-domestic buildings?	
a. Yes	
b. No, they go too far	
c. No, they don't go far enough	X
d. No, I disagree for another reason	
e. Unsure	
If you answered no (b, c or d), please explain your reasoning and provide alternative suggestions.	

Question 22

Do you agree with the proposed minimum standards for fabric performance in new non-domestic buildings as presented in Table 3.5 of this consultation document?	
a. Yes	
b. No, the standards go too far	
c. No, the standards do not go far enough	X
d. No, I disagree for another reason	
e. Unsure	
If you answered no (b, c or d), please explain your reasoning and provide supporting evidence or alternative suggestions.	

Question 23

Do you agree with the proposed improvement in the minimum standards for new or replacement windows in existing non-domestic buildings which are domestic in character?	
a. Yes	
b. No	X
c. Unsure	
If you answered no, please explain your reasoning and provide supporting evidence or alternative suggestions.	
We would prefer a U-value of below 1.2, rather than 1.4 as stated.	

Question 24

Do you agree with the further guidance on reducing moisture risks when upgrading retained thermal elements?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning and provide supporting evidence or alternative suggestions.

Question 25

Do you agree with the draft guidance in paragraph 4.15 of the draft Approved Document L, volume 2: *buildings other than dwellings* on reducing unwanted air infiltration when carrying out work to existing non-domestic buildings?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 26

Do you agree that the limiting U-value for rooflights in new and existing non-domestic buildings should be based on a rooflight in a horizontal position, as detailed in paragraph 4.4 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 27

Do you agree that we should adopt the latest version of BR 443 for calculating U-values in new and existing non-domestic buildings, as detailed in paragraph 4.1 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 28

Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 29

Do you agree with the proposed set of standards for air distribution systems for new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 30

Do you agree with the minimum efficacy proposals for lighting in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 31

Do you agree with the proposals for cooling in new non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a. Yes
- b. No, the standards go too far
- c. No, the standards do not go far enough
- d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 32

Do you agree with the proposals for improving the commissioning guidance and the provision of new information for new non-domestic buildings in Section 8 and 9 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a. Yes
- b. Yes, but additional changes should be made
- c. No
- d. Unsure

If you answered (b) or (c), please explain your reasoning and provide alternative suggestions.

Question 33

Do you agree with the guidance proposals for adequate sizing and controls of building services systems in new non-domestic buildings, as detailed in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

- a. Yes
- b. No, I do not agree with providing guidance on this
- c. No, the guidance should be improved
- d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 34

Do you agree with the proposal that wet space heating systems in new buildings should be designed to operate with a flow temperature of 55°C or lower?

a. Yes, through a minimum standard set in paragraph 5.9 of the *Approved Document L, volume 2: buildings other than dwellings*

b. Yes, through carbon and primary energy credit in SBEM

c. Yes, by another means

d. No, the temperature should be below 55°C

e. No, this standard should not be applied to all new buildings

f. No, I disagree for another reason

g. Unsure

Please explain your reasoning.

Question 35

Do you agree with the proposals to clarify, rationalise and simplify the guidance for building services in new non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 36

Do you agree with the proposals to simplify the requirements in the Building Regulations for the consideration of high-efficiency alternative systems in new non-domestic buildings?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 37

Do you agree with the proposals for replacement of fixed building services in existing non-domestic buildings as detailed in paragraphs 5.4 to 5.7 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 38

Do you agree with the newly proposed minimum efficiencies for natural gas, oil and LPG boiler and domestic hot water system installations in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 39

Should minimum boiler efficiency standards in existing non-domestic buildings still benefit from relaxations through the use of heating efficiency credits?

a. Yes, boiler installations should continue to benefit from heating efficiency credits

b. No, boiler installations should no longer benefit from heating efficiency credits (the Government's proposal)

c. Unsure

If you answered yes, please explain your reasoning.

Question 40

Do you agree with the proposed set of standards for air distribution systems for existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 41

Do you agree with the minimum efficacy proposals for lighting in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 42

Do you agree with the proposals for cooling in existing non-domestic buildings in Section 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the standards go too far

c. No, the standards do not go far enough

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 43

Do you agree with the proposals for requirements relating to the commissioning and providing information to building owners for existing non-domestic buildings?

a. Yes

b. Yes, but additional changes should be made

c. No

d. Unsure

If you answered (b) or (c), please explain your reasoning and provide alternative suggestions.

Question 44

Do you agree with the guidance proposals for adequate sizing and controls of building services systems in existing non-domestic buildings, as detailed in Sections 5 and 6 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, do not agree with providing this guidance

c. No, the guidance should be improved

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 45

Do you agree with the proposal that when whole wet space heating systems (i.e. boiler and radiators) are replaced in existing non-domestic buildings the replacement system should be designed to operate with a flow temperature of 55°C or lower?

a. Yes, through a minimum standard set in paragraph 5.9 of *Approved Document L, volume 2: buildings other than dwellings*

b. Yes, through carbon and primary energy credit in SBEM

c. Yes, by another means

d. No, the temperature should be below 55°C

e. No, this standard should not be applied to all existing buildings

f. No, I disagree for another reason

g. Unsure

Please explain your reasoning.

Yes, but we are unsure whether it's a, b or c.

Question 46

Do you agree with the proposals to restructure the guidance for building services in existing non-domestic buildings, and to incorporate the standards of the Non-Domestic Building Services guidance into the main body of the draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 47

Do you agree the Government should continue to provide guidance for minimum building services efficiencies in existing non-domestic buildings, if the standard does not go significantly further than the Ecodesign regulations?

a. Yes

X

b. No, the Ecodesign regulations are sufficient

c. No

d. Unsure

If you answered no (b or c), please explain your reasoning.

Question 48

Do you agree with the changes made to simplify, rationalise and clarify the guidance, and the updates to external references in Appendix E and Appendix F, in draft *Approved Document L, volume 2: buildings other than dwellings*, as outlined in paragraph 3.12.1 of the consultation document?

a. Yes

b. Yes, but not with the changes to the supplementary guidance

c. Yes, but not with the external references

d. No

e. Unsure

If you answered no, please explain your reasoning. Please do not repeat comments on the changes made to simplify, rationalise and clarify the guidance for Building Services which you have already provided under Questions 38, 51 and 52.

Question 49

Do you agree that the measures in Tables D.1 and D.2 of Appendix D of draft *Approved Document L, volume 2: buildings other than dwellings* are likely to be technically, functionally and economically feasible under normal circumstances?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 50

Do you agree with the proposals for relaxation factors for modular and portable buildings, as detailed in Tables 2.2 and 2.3 of draft *Approved Document L, volume 2: buildings other than dwellings*?

a. Yes

b. No, the requirements go too far

c. No, the requirements do not go far enough

d. Unsure

X

If you answered no (b or c), please explain your reasoning and provide supporting evidence or alternative suggestions.

We are concerned that temporary buildings have a habit of becoming permanent. There shouldn't be the ability to continually extend the relaxation period.

Question 51

Do you think that the Pulse methodology should be an approved means of demonstrating airtightness for non-domestic buildings?

a. Yes

b. No

c. Unsure

X

If you answered no, please explain your reasoning and provide supporting evidence.

Question 52

Do you agree that we should adopt an independent approved airtightness testing methodology such as the CIBSE draft methodology for non-domestic buildings?	
a. Yes, and the CIBSE methodology is appropriate	X
b. Yes, but with a methodology other than CIBSE	
c. No, an independent approved airtightness methodology shouldn't be adopted.	
d. Unsure	
If you answered no, please explain your reasoning.	

Question 53

Do you agree with the proposal for guidance on the calibration of devices that carry out airtightness testing in new and existing non-domestic buildings?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	

Question 54

Do you agree with the proposed approach to energy sub-metering, as detailed in Section 5 of draft <i>Approved Document L, volume 2: buildings other than dwellings</i> ?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	

Question 55

Do you agree with the proposals for transitional arrangements for buildings other than dwellings?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	

Question 56

Do you agree with the proposed guidance in Section 1 and Section 2 of draft *Approved Document F, volume 2: buildings other than dwellings* on minimising the ingress of external pollutants and on the proper installation of ventilation systems in non-domestic buildings?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning and provide alternative suggestions.

Question 57

Do you agree with the proposed guidance for reducing noise nuisance for ventilation systems in non-domestic buildings?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning and provide alternative suggestions.

Question 58

Do you agree with the additional guidance provided in paragraphs 1.18 to 1.26 of the draft *Approved Document F, volume 2: buildings other than dwellings* on the installation of ventilation systems?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 59

Do you agree that the guidance in Appendix B of the draft *Approved Document F, volume 2: buildings other than dwellings* provides an appropriate basis for setting minimum ventilation standards?

a. Yes

b. No

c. Unsure

If you answered no, please explain your reasoning.

Question 60

Do you agree with the list of industry guidance presented in Section 1 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	X
b. Yes, but additional guidance should be provided	
c. No	
d. Unsure	
Please explain your reasoning and where relevant provide alternative suggestions for guidance.	

Question 61

Do you agree with the list of references to industry guidance presented in Appendix C and Appendix D in the draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	X
b. No, the Government should amend the list of references	
c. No, for another reason	
d. Unsure	
If you answered no (b or c), please explain your reasoning and provide alternative suggestions.	

Question 62

Do you agree with the proposals to simplify, rationalise and clarify the Approved Document guidance in draft <i>Approved Document F, volume 2: buildings other than dwellings</i> as outlined in paragraph 4.3.7 of the consultation document?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	

Question 63

Do you agree with the guidance for the ventilation of car parks and offices, as detailed in Section 1 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	
b. Yes, but some improvements can be made	
c. No, the guidance should be significantly changed	
d. Unsure	
If you answered b or c, please explain your reasoning and provide alternative suggestions. Please note that the appropriate questions on measures to prevent the spread of infection are detailed in section 4.4 of this consultation document.	

Question 64

Do you agree with the proposals in Section 3 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> , when replacing an existing window with no background ventilators?	
a. Yes	
b. No, the standards do not go far enough	X
c. No, the standards go too far	
d. Unsure	
If you answered no, please explain your reasoning and provide alternative suggestions.	
We don't believe it is good practice to use trickle ventilation (due to heat loss leading to poor energy performance). We believe permanent and controllable ventilation should be encouraged (whether through mechanical or manual means (i.e.by opening windows)).	

Question 65

Do you agree with the proposal to provide a completed commissioning sheet to the building owner and associated guidance in Section 4 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning.	

Question 66

Do you agree with the proposed standards for provision of ventilation for common spaces in offices, shown in paragraph 1.36 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	
b. No	
c. Unsure	
If you answered no, please explain your reasoning.	

Question 67

Do you agree that extract ventilation in bathrooms, WCs, and other sanitary accommodation should be capable of operating in a continuous mode if necessary?	
a. Yes	X
b. No	
c. Unsure	
If you answered no, please explain your reasoning.	

Question 68

Do you agree with the proposal for indoor air quality monitoring in offices as outlined in paragraphs 1.39 to 1.41 of draft <i>Approved Document F, volume 2: buildings other than dwellings</i> ?	
a. Yes	
b. Yes, but with qualifications	X
c. No	
d. Unsure	
If you answered b or c, please explain your reasoning and provide any suggestions for guidance if applicable.	
At 1.40 d, the guidance states “any audible alarms should be able to be permanently deactivated”. In this instance, we feel there should be an alternative (perhaps a visual cue – bleeping light etc.) to demonstrate that CO2 levels are too high, and that action should be taken (e.g. opening a door/window).	

Question 69

If applicable, please provide any suggestions for guidance for indoor air quality monitoring (e.g. CO2 monitoring) in non-domestic buildings.

Question 70

Do you agree with the proposals for systems that recirculate air as outlined in paragraph 1.46 of draft *Approved Document F, volume 2: buildings other than dwellings*?

- | | |
|-----------|-------------------------------------|
| a. Yes | <input checked="" type="checkbox"/> |
| b. No | <input type="checkbox"/> |
| c. Unsure | <input type="checkbox"/> |

If you answered no, please explain your reasoning.

Question 71

Do you agree with the proposed minimum ventilation standard and indoor air quality monitoring in occupiable rooms in all types of non-domestic buildings where singing, loud speech or aerobic exercise may take place, where low temperature and low humidity environments may exist, or where members of the public may gather in large groups? These are outlined in paragraphs 1.27 and 1.28 of draft *Approved Document F, volume 2: buildings other than dwellings*.

- | | |
|-----------------------------|-------------------------------------|
| a. Yes | <input checked="" type="checkbox"/> |
| b. Yes, with qualifications | <input type="checkbox"/> |
| c. No | <input type="checkbox"/> |
| d. Unsure | <input type="checkbox"/> |

If you answered b or c, please explain your reasoning and provide any suggestions for guidance if applicable.

Question 72

Do you think the mitigating measures to protect against infection via aerosols would be suitable for any non-domestic buildings other than those stated in the Approved Document guidance?

a. Yes

b. No

c. Unsure

If you answered yes, please explain your reasoning and provide evidence to support this.

Question 73

Do you agree with the extension of the scope to cover residential (institutional) and residential (other) buildings described in Table 0.1 in the draft Approved Document S?

a. Yes

b. Yes, but they should be expanded to include more building types and/or existing buildings

We feel buildings in which people must visit (offices, for example) should be included. Additionally, if major works are being carried out on an existing building with overheating problems, we feel they should be addressed at this time.

c. No, they should only include flats and houses

d. No, I disagree for another reason

e. Unsure

Please explain your reasoning.

Question 74

Do you agree with the proposed changes to the simplified method as outlined in Table 1.2 of draft <i>Overheating Approved Document</i> ?	
a. Yes	
b. No	X
c. Unsure	
If you answered no, please explain your reasoning.	
<p>We feel this is too simplistic, simply having glazing areas and U-values is too crude. Consideration should be given to other factors, for example:</p> <ul style="list-style-type: none"> • Which way the façade faces in relation to the sun • Chilled structure • Ambient loop heat networks 	

Question 75

Do you agree with the proposals to ensure noise is considered in new residential buildings when the overheating strategy is in use, and the proposed guidance in Section 2 of the draft <i>Overheating Approved Document</i> ?	
a. Yes	X
b. Yes, but with amendments to the guidance	
c. No, I do not agree with limiting noise when the overheating strategy is in use	
d. Unsure	
If you answered b or c, please explain your reasoning and provide alternative suggestions.	

Question 76

Do you agree with minimising the ingress of external pollutants when the overheating strategy is in use, and that the external pollutants guidance in draft *Approved Document F, volume 1: dwellings* should be followed where practicable?

a. Yes	<input checked="" type="checkbox"/>
b. Yes, but with amendments to the guidance	<input type="checkbox"/>
c. No, I do not agree with minimising the ingress of external pollutants when the overheating strategy is in use	<input type="checkbox"/>
d. Unsure	<input type="checkbox"/>

If you answered b or c, please explain your reasoning and provide alternative suggestions.

Question 77

Do you agree with the proposals on security in Section 2 of the draft *Overheating Approved Document* in new residential buildings?

a. Yes	<input checked="" type="checkbox"/>
b. No	<input type="checkbox"/>
c. Unsure	<input type="checkbox"/>

If you answered no, please explain your reasoning and provide alternative suggestions.

Question 78

Do you agree with the protection from falling guidance proposed in Section 3 of the draft *Overheating Approved Document*?

a. Yes	<input type="checkbox"/>
b. No	<input checked="" type="checkbox"/>
c. Unsure	<input type="checkbox"/>

If you answered no, please explain your reasoning and provide alternative suggestions.

We agree with the protections, but we don't understand why this appears in the Overheating Approved Document when these protections are already listed under Part K.

Question 79

Do you consider the guidance on protection from falling proposed in Section 2 of the draft *Overheating Approved Document* should also include requirements to avoid overstretching? (such a maximum distance between the inside face of the wall and the maximum position of the window handle?)

a. Yes – please also provide evidence/reasoning

b. No

c. Unsure

X

If you answered no, please explain your reasoning and provide alternative suggestions.

We would be interested to see data or evidence to illustrate why these proposed measures are being introduced.

Question 80

Are there any further issues which affect usability that should be included in the draft *Overheating Approved Document*?

a. Yes

b. No

c. Unsure

Please explain your reasoning and provide supporting evidence.

There is no mention of windows that are too tall for use.

Question 81

Please provide any feedback you have on the impact assessment here, including the assumptions made and the assessment of the potential costs and benefits of the proposed options we have made.