



## **Review of energy efficiency requirements and related areas of Building Regulations**

### **Consultation return form**

26 July 2023

(closing date for receipt of responses is 15 November 2023 at 23:59)

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## **Section 0: Information and how to respond**

### **DISCUSSION PAPER PACKAGE – CONTENTS AND RESPONSE**

- 0.1 This consultation has been issued by the Department of Finance, which has responsibility for maintaining the Building Regulations for Northern Ireland. This document, together with the other consultation documents, is available online at: <https://www.finance-ni.gov.uk/consultations>
- 0.2 The consultation documents are:
- Review of energy efficiency requirements and related areas of Building Regulations: Discussion Document and Pre-consultation on next steps
  - Draft Equality Screening document
  - Rural Needs Assessment

### **Responding to this discussion paper**

- 0.3 We look forward to receiving your comments and views concerning any of the proposals contained in this discussion paper. We ask you to exercise care and refrain from the inclusion of any potentially defamatory material as it is our intention to publish responses on the Department's website. We will not publish the names or contact details of respondents, but will include the names of organisations responding.
- 0.4 We would encourage you to respond to the discussion paper using the online facility on the Citizen Space platform at <https://consultations2.nidirect.gov.uk/dof/building-regulations-discussion-document-2023>, where you can answer the questions and enter any supporting comments. It is not compulsory to answer all of the questions, so you can take part in the survey even if you do not have views on all of the issues.
- 0.5 If you use the consultation hub - Citizen Space - to respond, you will receive a copy of your response via email. Otherwise, individual responses will not be acknowledged unless specifically requested.
- 0.6 Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

### **Next steps in the consultation process**

- 0.7 Where respondents have given permission for their response to be made public, and after we have checked that they do not contain personal

information or product names, responses will be made available to the public at <https://www.finance-ni.gov.uk/publications>. We may also make responses to this consultation available to the Northern Ireland Assembly and for public inspection at the Building Standards Branch office.

- 0.8 Following the closing date, all responses will be analysed, and the Department will publish a summary of responses to the consultation.
- 0.9 All information will be handled in accordance with the General Data Protection Regulations.

### **Confidentiality and data management**

- 0.10 If you ask for your response to be regarded as confidential and not to be published, you will be asked to explain to us why you regard the information you have provided to be confidential.
- 0.11 Information provided in response to this discussion paper, including personal data will be published or disclosed in accordance with the access to information regimes (These are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 2018 (DPA), the UK General Data Protection Regulation, and the Environmental Information Regulations 2004. If we receive a request for disclosure of confidential information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.
- 0.12 The Department of Finance will process your personal data in accordance with the law and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.
- 0.13 Are you satisfied that this consultation has followed the Consultation Principles? If not or you have any other observations about how we can improve the process please contact us at [info.bru@finance-ni.gov.uk](mailto:info.bru@finance-ni.gov.uk) or write to the following address:  
Building Standards Branch  
Department of Finance  
6th Floor Goodwood House  
44-58 May Street  
Belfast  
BT1 4NN

### **Territorial extent:**

- 0.14 This call for evidence consultation applies solely to Northern Ireland.

## Completion of the Response Form

The Department will consider all responses to this consultation received on or before the closing date for receipt of responses which is **15 November 2023**.

***Submissions made after this date will not be considered.***

**We would strongly encourage you to respond to the consultation by completing the survey on the Citizen Space platform, which can be accessed [here](#).**

If using this form to respond to the consultation please send it by email to:

[info.bru@finance-ni.gov.uk](mailto:info.bru@finance-ni.gov.uk) or it may be posted to:

Consultation Co-ordinator  
Department of Finance  
Building Standards Branch  
Floor 6,  
Goodwood House  
44-58 May Street  
BELFAST  
BT1 4NN

Please refer to the package of Consultation Documents which outline fully the proposed amendments at –

<https://www.finance-ni.gov.uk/consultations/review-energy-efficiency-building-regulations>

Click on the box (or insert an “x”) beside “Yes”, “No” or “No view” as appropriate. It is not essential to give an answer to every question.

Please make any comments you might have in the box provided. If you disagree with any of the proposals the Department would be interested to know why you disagree.

## Respondent Details

In order for your response to be considered valid, you must provide the following information:

<b>Name</b>	Ian Harper
<b>Organisation (if any)</b>	Belfast City Council
<b>Email</b>	harperi@belfastcity.gov.uk

Are you responding as an individual?

Or are you representing the views of an organisation?

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published.

If you ask for your response to be confidential, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. If you ask for your response to be regarded as confidential and not to be published, you will be asked to explain to us why you regard the information you have provided as confidential.

To find out how we handle your personal data, please see your privacy policy ([Department of Finance Privacy Notice | Department of Finance \(finance-ni.gov.uk\)](#) ). When submitting this response you agree to our privacy policy.

The Department of Finance would like your permission to publish your consultation response. Please indicate if you wish your response to be treated as confidential.

Yes  No

If you wish your response to be treated as confidential, please provide your justification for doing so.

We may wish to contact you again in the future, but we require your permission to do so. Are you content for the Department of Finance to contact you again in relation to this consultation exercise?

Yes  No

## Section 1: Introduction and General Information

No questions

## Section 2: Background

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### Section 2A: Background - legislative considerations and policy contexts

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**Q.2A.1 Do you agree that coming into force considerations would be best addressed through review of Article 19 of the Order, rather than by transitional provisions of any amendment to Part F?**

Yes  No

Comments (if any):

Belfast City Council would agree that this could be dealt with through a Review of Article 19. However, some means to control the situation of an application being submitted and commenced which would allow that application to remain valid would be required. Whilst there is provision in regulations for applications containing more than one dwelling there is not for other application types.

Our experience on similar type changes to the Building Regulations would have involved a significant influx of plans prior to the implementation date to avoid the requirements. Therefore, developers can build to the older standard and any attempt to prevent this using transitional provisions may be problematic as discussed. This issue was particularly relevant on the implementation of phase 1, with approx. 50 full plans applications received prior to 1<sup>st</sup> June 2022. Some of these applications had high numbers of individual properties within the one application.

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**Q.2A.2 Do the current arrangements here, with up to three year phasing in period, support an argument for a more ambitious uplift, as it provides scope for processes to be developed and training to take place?**

Yes  No  Comments (if any):

Belfast City Council has no opinion on this matter but do consider the requirement to meet any uplifts would be best dealt with by amending the Order in combination with the Regulations. This would ensure any influx of applications made prior to the changes currently valid for three years or indefinitely upon commencement would have limited scope to avoid the new requirements.

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**Q.2A.3 What do you consider should be the maximum time permissible for previously approved applications to commence on site after the introduction of the new standards?**

Comments (if any):

Belfast City Council would have no evidence or other information to inform this decision.

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**Q.2A.4 Do you have a view on any specific regulations or definitions which would benefit from reform, with a view to simplifying or clarifying Part F regulations<sup>1</sup>? If so, please provide details.**

Comments (if any):

Belfast City Council has no view on this particular matter.

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**Section 2B: Background - (developments elsewhere)**

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**Q.2B.1 Have you modelling information directly comparing the compliant or 'notional' buildings across administrations, ideally using an up to date and consistent methodology for comparative analysis purposes (e.g. SAP 10)? If so, please provide a link or information on how to access this.**

Yes  No

Comments (if any):

Belfast City Council has no information to provide guidance on this issue.

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<sup>1</sup> [The Building Regulations \(Northern Ireland\) 2012 \(legislation.gov.uk\)](http://legislation.gov.uk)



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**Q.2B.2 Are there any additional local characteristics or issues around our local industry that the Department should be mindful of as we take forward proposals?**

Comments (if any):

Given the poor gas network in rural areas and the large reliance on oil, properties in these areas will be disproportionately affected than those in urban locations.

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**Q.2B.3 Do you agree with the proposed timing of uplifts planned for 2023/24 (Phase 3) and 2026/27 (Phase 4), which are intended to follow developments in England by 18-24 months in each case?**

Yes  No

Comments (if any):

Belfast City Council has no objections with the proposed time scales.

## Section 3: Pre-consultation Phase 3 proposals for dwellings

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**Q.3.1 The Department’s programme of proposals seeks to implement a ‘Phase 3’ uplift here in 2023 (likely now to be in 2024) to reflect the changes above. Do you agree that this is appropriate that this should cover the extent of issues above?**

Yes  No

Comments (if any):

Belfast City Council agrees with the proposed timeline for the Phase 3 uplift. BCC supports the Climate Change legislation in meeting the “net Zero” targets and are keen to see progress in this area.

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## Section 3A: Part F (Conservation of fuel and power) proposals for new dwellings, Phase 3

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**Q.3A.1 Do you agree that a new primary energy metric and TPER targets should be introduced?**

Yes  No

Comments (if any):

Belfast City Council would agree with the proposed new primary energy metric as it is a more appropriate and accurate measurement of the actual energy used. The availability of low carbon energy use does not encourage better performing buildings. If we continue to use CO2 emissions as the primary performance metric for homes, it will not be possible to tell whether a property performs well under this metric because it is actually energy efficient, or if this is a consequence of a decarbonised electricity grid.

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**Q.3A.2 Are you content that a FEES metric and targets should be introduced in line with the assessment in England?**

Yes  No

Comments (if any):

Belfast City Council would welcome the introduction of FEES, the measurement of the building fabric in terms of u-value, air-tightness and thermal bridging is considered vital in minimising energy demand. It will also ensure fabric heat loss is always considered and cannot be off set using low carbon fuels. FEES may also focus designers to give greater emphasis on thermal bridging and air tightness. Also, the cost of improving fabric efficiency during construction is always much lower than doing it on a retrofit basis. The introduction of FEES will bring Northern Ireland in-line with other jurisdictions in the UK.

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**Q.3A.3 Could you provide a specification that house builders are actually adopting in practice in order to be compliant with England’s current requirements? Please provide details and commentary or explanation.**

Yes  No

Comments (if any):

Belfast City Council has no information in this regard.

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**Q.3A.4 Do you think the proposed Notional Dwelling fabric is suitable for Option 1 and Option 2’s proposals?**

Yes  No

Comments (if any):

Belfast City Council has no opinion on this matter.

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**Q.3A.5 Would you agree with replication of England’s limiting U-values? We would be grateful for any evidence or reasoning if you think these should these remain in line with the Republic of Ireland or be otherwise different.**

Yes  No

Comments (if any):

Belfast City Council would have no objection to following England’s limiting u-values to avoid having to make specific amendments to NCM software. We also have no objection to following ROI, however we understand the additional software changes.

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**Q.3A.6 Do you agree that the Department should not introduce a cost (SAP rating) metric assessment?**

Yes  No

Comments (if any):

Belfast City Council agrees with the reasons given in the consultation and the introduction of two new metrics Primary Energy and FEES is a significant change at this point to allow industry to adapt. A cost metric should form part of phase 4.

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**Q.3A.7 Do you agree that a delivered energy or energy use intensity metric is not needed as part of the Phase 3 uplift?**

Yes  No

Comments (if any):

Belfast City Council agrees with the reasons given in the consultation and the introduction of two new metrics i.e. primary energy and FEES metric is considered sufficient at this time. Further metrics should be considered under phase 4.

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**Q.3A.8 Do you agree that a renewable energy ratio assessment is not needed as part of the Phase 3 uplift?**

Yes  No

Comments (if any):

Belfast City Council agrees with the reasons given in the consultation and the introduction of two new metrics i.e. primary energy and FEES metric is considered sufficient at this time. Further metrics should be considered under phase 4.

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**Q.3A.9 Have you any comment to make on the metrics the Department is proposing to adopt for Phase 3?**

Yes  No

Comments (if any):

Belfast City Council considers the two metrics being added should provide a robust assessment process, without being unduly burdensome or complex.

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**Q.3A.10 Have you any opinion or evidence to support limiting the extent of variance for any individual dwelling when using a whole-block average performance to demonstrate compliance with TER, TPER or TFEE assessments?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or opinion to change the current stance regarding whole-block averaging. From an industry perspective whole-block averaging is well established with designers understanding and familiar with the requirements.

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**Q.3A.11 Do you agree that the changes to the airtightness testing regime should include the measures introduced in England, but provide for a lower maximum permissible air permeability level than 8.0 m<sup>3</sup>/(h.m<sup>2</sup>) @ 50 Pa? If so, what should the maximum permissible level be?**

Yes  No

Comments (if any):

From our experience within Belfast City Council, the air permeability of 8.0 m<sup>3</sup>/(h.m<sup>2</sup>) @ 50 Pa in the majority of cases is being exceeded and therefore if it is lowered it will have minimal impact on industry. Guidance in relation to ventilation will need to be mindful of any changes to the current air permeability rate.

From an enforcement perspective the requirement to test all properties will provide greater assurances that the infiltration rate actually achieved in the dwelling is a fair representation to that declared at the design stage. It will also aid with ensuring competent construction and as a result it will have a positive impact on any performance gap.

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**Q.3A.12 Do you agree that all current fuel factors in TBF1 should be removed, so that targets (TER) are no longer relaxed where higher carbon fuels are used?**

Yes  No

Comments (if any):

Given the potential impact with either option we would recommend that a more thorough assessment of the impacts in Northern Ireland are carried out.

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**Q.3A.13 Are you content with the likely outcomes for biofuels under Option 1 and the proposed Primary Energy metric ? If not, how should the regime be less, or more, permissive towards biofuels?**

Yes  No

Comments (if any):

Belfast City Council would like to see further research completed to provide further information on the extent of the additional measures that would be required to fulfil the requirements of the TPER if using biofuels under Option 1.

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**Q.3A.14 Have you any evidence or concern around the extent of renewable generating technology expected under either Option 1 or 2?**

Yes  No

Comments (if any):

Belfast City Council has no evidence to provide guidance on this issue.

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**Q.3A.15 Have you any comment on the proposed revised treatment of non-export connections?**

Yes  No

Comments (if any):

Belfast City Council welcomes the proposal towards following the new SAP 10 methodology in its assessment of the 'in-use'  $\beta$  factor for the assessment in dwellings. The proposal will ensure that the true use of electricity being generated from renewables is measured.

From an enforcement perspective, if the 'in use'  $\beta$  factor is used it will remove Building Controls requirement to complete the additional check regarding how the designer proposes to optimise and use electricity that cannot be exported.

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**Q.3A.16 Do you agree that new heating systems should be designed and installed to operate with a maximum flow temperature of 55°C as per England’s current guidance? If not please provide evidence to support a different maximum flow temperature, or position.**

Yes  No

Comments (if any):

Belfast City Council agrees with the introduction of proposed low temperature systems if it will help future-proof homes for different types of low carbon heating.

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**Q.3A.17 Do you agree that replication of Sections 5 and 6 of England’s Approved Document on building services and controls guidance into the next version of TBF1 would be appropriate for the Phase 3 proposals?**

Yes  No

Comments (if any):

Belfast City Council welcomes the guidance in respect to building services and controls being brought into the new version of TBF1, from a designers and enforcers perspective it will provide a single source point for guidance and hopefully bring clearer structure to the technical booklet.

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**Q.3A.18 Do you have any comments or issues around how UK and EU Ecodesign requirements might interact with Part F guidance requirements at Phase 3 or over the longer term?**

Comments (if any):

Belfast City Council has no comments or issues around the Ecodesign requirements.

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**Q.3A.19 Do you agree that designers, should be able to demonstrate a water efficiency assessment as per Appendix A of England’s Approved Document G?**

Yes  No

Comments (if any):

Belfast City Council has no preference in this respect to this issue. However, if it is adopted, we would welcome clarification on how Building Control will enforce this change. Example, will it be the responsibility of the designer to provide associated calculations at design stage and how will the control of the water consumption be verified at the completion of a project.

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**Q.3A.20 Have you any suggestion or further insight on how heat networks should be assessed under the Phase 3 proposals? If so, please outline the issue and suggested handling in your response.**

Yes  No

Comments (if any):

Belfast City Council has no suggestion or insight on this matter.

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**Q.3A.21 Is the specification of the heat pump proposed for Option 2 appropriate? If not, how should it be amended?**

Yes  No

Comments (if any):

Belfast City Council has no suggestion or insight on this matter.

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**Q.3A.22 Do you have concerns or evidence on the viability and risks associated with either Option 1 or Option 2?**

Yes  No

Comments (if any):

Belfast City Council has no specific concerns or evidence, other than noted in question Q.3A.23.



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**Q.3A.23 Should the Department implement Option 1 or Option 2 for the Phase 3 uplift?**

Option 1       Option 2       Other

Comments (if any):

Option 1 is likely to be more achievable in the short term and reduces risk to the industry regarding skills / materials shortage. However, this should be considered as a short-term steppingstone in the potential of adopting Option 2 (subject to further research) as part of the Phase 4 uplift.

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**Q.3A.24 Have you any comment on how the Option 2 specification should be improved, for Phase 3 or Phase 4 or 5?**

Comments (if any):

Belfast City Council has no comment on this matter.

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**Q.3A.25 Do you agree that the Department should adopt the new BREL type format for notice of compliance with emissions, renewables and other requirements in keeping with England's provisions? See Appendix B of Approved Document L1 (2021) for further detail<sup>2</sup>**

Yes       No

Comments (if any):

Belfast City Council welcomes a new BREL type format to demonstrate compliance with emissions, renewables etc. This will provide a more unified information package with clear information for every home, it should bring greater reporting consistency.

ADL1 identifies that the building control body will be able use the BREL report to help check that what was designed has been built, however as the report is only issued at the completion of the project, the report will offer little value during the construction process.

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<sup>2</sup> [Conservation of fuel and power: Approved Document L - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/90422/Conservation_of_fuel_and_power_April_2014.pdf)

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**Q.3A.26 Do you agree that the Department’s guidance should additionally require provision of a new non-technical Home User Guide in keeping with England’s provisions? for further detail see**

<https://www.gov.uk/government/publications/home-user-guide-template>

Yes  No

Comments (if any):

Belfast City Council would welcome the proposal for a new non-technical Home User Guide. Even if a home is fully compliant with the building regulations requirements there is still a possibility that it will not be used as it was designed. Ensuring that homeowners understand how to operate the various provisions within the property will help with the environmental, comfort and fuel savings of the physical measures are maximised.

---

**Q.3A.27 Do you agree that the Department should require geo-located photographs to be lodged to support evidence of the as-built construction?**

Yes  No

Comments (if any):

Belfast City Council would welcome the use geo-located photographs to support evidence of the as-built construction. However, we would note that photograph assessment can be very subjective and difficult for someone to assess and therefore any enquiry into compliance may be difficult.

Photographs should be for the developer to illustrate compliance and not for the district council assess, also photographs should not be a substitute for the council to making an enquiry into compliance on-site.

For the credibility of the document, we would point out the importance of any photograph being time stamped and geotagged to avoid fabrication. We would welcome guidance from the Department on what actual details should be photographed.

We would have concerns regarding the failure of builders to take the required photos during the construction phase, in the absence of photographs it could make it difficult and expensive for the contractor to prove compliance.

The theory of this makes absolute sense however its success will depend on proper engagement by the relevant stakeholders. We would hope that the proposal does not have a similar output to the likes of the accredited details scheme.

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**Section 3B: Part F (Conservation of fuel and power) work to existing dwellings, Phase 3.**

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**Q.3B.1 Do you support the addition of a Primary Energy and FEES metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing dwellings?**

Yes  No

Comments (if any):

Belfast City Council would welcome the addition of a Primary Energy and FEES metric alongside Carbon emissions metric when using the Equivalent Target Approach as this will bring it in-line with the new-build proposals.

---

**Q.3B.2 Do you have any particular concerns or insight on the U-values used in standards related to existing dwellings for any of the various situations in other administrations?**

Yes  No

Comments (if any):

Belfast City Council has no insight into this matter.

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**Q.3B.3 Do you agree that our U-value standards should be largely in line with the proposed standards for new building elements in cases of extensions and replacement elements?**

Yes  No

Comments (if any):

Belfast City Council understands the benefit of having u-value standards for extensions and replacement elements being similar to new build standards as this will aid with consistency regardless of build type.

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**Q.3B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs?**

Yes  No

Comments (if any):

Belfast City Council has no objection to following the u-values used in England.

---

**Q.3B.5 Are there any particular areas where alternative performance values for fabric elements (such as EWI) should be considered? If so please provide evidence and an indication of the value you consider appropriate.**

Yes  No

Comments (if any):

Belfast City Council has no evidence on this matter.

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**Q.3B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements, where a material change of use to form a dwelling occurs?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information that would inform a change to the current requirement.

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**Q.3B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in these situations?**

Yes  No

Comments (if any):

Belfast City Council sees the value on seeking expert advice in respect to traditional construction type buildings to avoid future problems.

Belfast City Council would welcome a definition for what building types fall within traditional construction.

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**Q.3B.8 Do you agree that the Boiler Plus measures introduced in England in 2018 and thermostatic control measures introduced in 2022 should be replicated and included in revised guidance here?**

Yes  No

Comments (if any):

Belfast City Council has no opinion regarding the introduction of the Boiler Plus measures.

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**Q.3B.9 Do you agree that where a new or complete replacement heating system is being installed in an existing dwelling, it should be installed to operate with a maximum flow temperature of 55°C?**

Yes  No

Comments (if any):

Belfast City Council agrees with the introduction of proposed low temperature systems if it will help future-proof homes for different types of low carbon heating.

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**Q.3B.10 Do you agree that both an emissions and primary energy performance assessment should be applied to boiler replacements where a change of fuels is proposed?**

Yes  No

Comments (if any):

Belfast City Council has no comment on this matter.

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**Q.3B.11 Do you have information or evidence to help assure the Department that reversion from liquid biofuels to conventional home heating oil need not be a concern?**

Yes  No

Comments (if any):

Belfast City Council has no information or evidence to help the Department in this regard.

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**Q.3B.12 Do you agree that Technical Booklet F1 should be amended to follow the minimum services provisions of Section 5 and 6 of England’s Approved Document L1, subject to further NIBRAC and public consultations? Please include any ‘lessons learned’ from the roll-out of these provisions elsewhere which may merit consideration.**

Yes  No

Comments (if any):

Belfast City Council has no information or evidence to help the Department in this regard.

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**Q.3B.13 Do you agree that the consequential improvements similar to those applicable to extensions to dwellings in Wales should apply here?**

Yes  No

Comments (if any):

Belfast City Council would welcome the consequential improvements similar to the standards in Wales. From an enforcers perspective the consequential improvements applicable in Wales should be relatively straightforward to enforce here in N.I.

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**Q.3B.14 Do you have any evidence or insight on the major renovation measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here? If so, please include the evidence with your response.**

Yes  No

Comments (if any):

Belfast City Council has no evidence or insight.

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### **Section 3C: Part K (Ventilation) dwellings- Phase 3**

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**Q.3C.1 Do you agree that Technical Booklet K (TBK) should be split into two (similar to current Part F guidance) and that relevant guidance currently cited within the Ventilation Compliance Guides should be integrated within them?**

Yes  No

Comments (if any):

Belfast City Council would agree with splitting TBK in two, one for domestic and the other for non-domestic properties. This should make the guidance clearer and for all stakeholders involved.

We agree to the inclusion of the Ventilation Compliance Guides within TBK. In doing so there should be a focus on readability and streamlining its structure, whilst retaining the right level of technical detail.

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**Q.3C.2 Do you agree that Technical Booklet K guidance should cite background ventilator sizes in line with England and Wales?**

Yes  No

Comments (if any):

Belfast City Council has no objection to following England and Wales background ventilator sizes.

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**Q.3C.3 Do you agree that revised TBK guidance should align the three principal systems (natural, continuous mechanical extract and continuous supply and extract/MVHR) in keeping with air-permeability thresholds England and Wales?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed decision on this question.

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**Q.3C.4 Do you have any evidence or guidance that should prompt the Department to develop an independent approach to noise of mechanical ventilation systems in dwellings?**

Yes  No

Comments (if any):

Notwithstanding the response given for 3C.10, professional bodies have already published guidance to support internal noise assessments for the regulations in England and Wales - divergence would have to see the guidance reviewed or supplementary NI guidance produced.

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**Q.3C.5 Do you agree that the updated performance based specification in England's ADF1 (Ventilation – dwellings) should be replicated in equivalent guidance here?**

Yes  No

Comments (if any):

If the performance specification is more reflective of actual pollutants, then Belfast City Council would support the change.

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**Q.3C.6 Do you support amendment of the Technical Booklet K guidance in line with the developments in England and Wales, to address ventilation alongside fabric retrofit work?**

Yes  No

Comments (if any):

Belfast City Council would welcome the additional ventilation guidance for retrofit works.

However, the administration of this proposal may prove difficult from an assessment and enforcement perspective. Retrofit works can be piece meal and be completed at different times, plus interventions may take place prior to any site inspection, therefore verification may prove to be difficult.



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**Q.3C.7 Have you any comment or insight on how the Department or others should support skills or cite competence standards for the design, testing and commissioning of ventilation systems in dwellings? Please include relevant details in your response.**

Yes  No

Comments (if any):

From our experience it would not be uncommon to have unqualified personnel designing mechanical ventilation systems and therefore we would welcome the guidance on the definition of who is competent to design, test, and commission ventilation systems. Having a definition for 'expert advice' should aid with improving the ventilation process from design, installation, and commissioning.

---

**Q.3C.8 Have you any other evidence on issues or suggestions on ventilation standards in dwellings, which the Department should consider as part of the review of Part K (Ventilation)?**

Yes  No

Comments (if any):

Belfast City Council would see the use of Positive Input Ventilation (PIV) systems being proposed to demonstrate compliance with TBK for both new builds and extensions. Designers have difficulties in identifying which method it falls under, further clarification of this would be useful. We would also welcome any information regarding any limitations to the use of PIV.

Also, whilst Passive Stack has been removed under method 2 consideration might be given to identifying that it is still an option to demonstrate compliance.

The current guidance within TBK for background ventilation within extensions / alterations would benefit from being made clearer.

---

**Q.3C.9 Do you agree that CO<sub>2</sub> monitoring in dwellings should be a consideration for Phase 4?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed decision on this question.

---

**Q.3C.10 Do you support inclusion of ventilation guidance to more specifically consider clothes drying, in line with current provisions in Scotland ?**

Yes  No

Comments (if any):

Belfast City Council supports any amendments that will ultimately improve the ventilation provisions within a dwelling and which address issues such as condensation, damp and mould.

Drying rooms: External designated drying areas should be provided for dwellings, however occupants of flats are often reluctant for security reasons putting their clothes outside to dry in a communal drying area/yard – a private external drying area would be desirable for each dwelling.

Ventilation guidance to drying rooms: Whilst drying clothes internally is not ideal, due to our inclement weather this is difficult to avoid. A suitably designed internal designated drying room is preferable over occupant's drying clothes in habitable rooms or other unsuitable rooms/areas- such as halls with no ventilation or inadequate ventilation or heating. However, a lot of moisture will be produced during the drying process, and there is a risk of condensation and mould, and damage to the building. Therefore, adequate ventilation and heating is required for the drying rooms to remove moisture and specific guidance should be produced for ventilation to drying rooms in line with Scotland.

---

**Q.3C.11 Do you have any evidence or insight on other aspects of ventilation for dwellings which the Department should take into account?**

Yes  No

Comments (if any):

Ventilation / Overheating

The fitness for Habitation Standard (Private Tenancies NI Order 2006) requires adequate ventilation and heating to privately rented dwellings. DSD guidance Manual for local authorities dated March 2007 Private Tenancies (Northern Ireland) Order 2006 provide advice on the fitness standard and in particular Section 6 provides advice on Ventilation - Section 6.4 does specify that "to control the amount of ventilation and avoid prejudicing security, some part of the ventilation should normally be provided by means other than just a side hung door". BCC would suggest that consideration should be given to security with respect to openings for purge associated with overheating and/or ventilation. 6.11 While satisfying provision for ventilation, the level of any permanent ventilation should not be so great as to cause excessive heat loss.

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### Section 3D: Mitigating overheating risks in dwellings – Phase 3

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**Q.3D.1 Do you agree that local regulation and guidance will be needed to mitigate overheating in new dwellings and residential buildings?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed decision on this question.

---

**Q.3D.2 Do you agree with the proposed course of action whereby DSM modelling to TM59 requirements would be used in more complex situations but a simplified approach, largely following Scotland’s proposals, could be applied in more straightforward situations?**

Yes  No

Comments (if any):

The simplified approach to overheating in Scotland is an easier option to follow and enforce than England and Wales.

Linking heat removal requirements to the current purge ventilation standards in TBK will minimise further building control checks.

To avoid any Planning issues on any required mitigation measures an emphasis should be placed in guidance to early consideration of Planning matters.

---

**Q.3D.3 Should the new requirements only apply to new-build situations (i.e. to the erection of a building) or should it also apply to material change of use situations and/or extensions and structural alterations?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed decision on this question.

---

**Q.3D.4 Should the noise assessment levels be based on planning issues, or should bespoke noise assessment and testing be expected where openings are proposed for purge cooling of rooms in dwellings or similar buildings?**

Based on planning issues  Bespoke

Comments (if any):

Bespoke noise assessment and testing may be appropriate for certain developments in high noise areas. See ProPG - Planning and Noise (2017) for further information.

---

**Q.3D.5 Are you content that the guidance in Appendix D of the current Technical Booklet K provides sufficient clarity on pollution assessment where natural purge ventilation for cooling is proposed?**

Based on planning issues  Bespoke

Comments (if any):

Belfast City Council has no evidence or information to provide guidance on the matter.

---

**Q.3D.6 Do you agree that guidance should be revised to support a 1.1m high guarding at openings for purge cooling or should the current 800mm height for guarding at windows remain?**

Yes  No

Comments (if any):

Any change to the current guidance for guarding in Technical Booklet H will need to ensure appropriate alignment with other technical booklets including TBE (Fire Safety), TBF (Conservation of Fuel and Power) and TBK (Ventilation). As an example, in N.I. under regulation 33 we recommend the use of emergency egress windows, setting a height of 1100mm for guarding sets the emergency egress window at the maximum height which may not be suitable for some users.

Care should be taken not to over complicate the current guidance for guarding and any proposed change should be clear.

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**Q.3D.7 Are there any other issues which should be taken into consideration in terms of the usability of openings for purge cooling?**

Comments (if any):

Belfast City Council has no evidence or information to provide guidance on this issue.

---

**Q.3D.8 Have you any evidence or modelling to indicate if a requirement for cooling could result in new Carbon emissions or Primary Energy targets proposed in Section 3A (see Table 3A.1) being difficult, or impossible, to deliver in practice in some circumstances e.g. single aspect flats next to noisy/polluted roads? If so, please provide details and outputs.**

Comments (if any):

Belfast City Council has no evidence or modelling to provide guidance on the matter.

---

**Q.3D.9 Can you evidence any 'lessons learned' from roll out of the overheating mitigation policies elsewhere that we should consider?**

Comments (if any):

Belfast City Council has no information on overheating mitigation policies elsewhere.

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**Section 3E: Electric Vehicle infrastructure- background and Phase 3 proposals for dwellings**

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**Q.3E.1 Do you agree with the proposed approach to use Building Regulations to legislate for EV infrastructure requirements?**

Yes  No

Comments (if any):

Belfast City Council considers that Building Regulations is not an ideal statutory instrument to legislate for EV infrastructure requirements. A Building Regulations application is late in the design process of a construction project and the planning of CP's would be better suited at a much earlier stage. It would not be uncommon for large multi-site developments to be split into smaller applications and therefore CP's may not be included if applications were staged in such a manner either purposefully or naturally.

In most instances, Building Regulations do not consider areas outside the vicinity of the property nor requirements relating to parking provision.

---

**Q.3E.2 Do you agree with the proposed approach to follow the technical provisions in England? The Department would be grateful for any comment on the guidance or out-workings there or in other regions.**

Yes  No

Comments (if any):

Belfast City Council has no information regarding the out-workings from other regions.

---

**Q.3E.3 Do you agree that for new dwellings with associated parking spaces; one CP per dwelling or one per associated parking space (whichever is the lesser) should be required and that, in addition, for those buildings with more than ten associated parking spaces, ducting to the rest of the residential parking spaces to facilitate future installations, should also be required?**

Yes  No

Comments (if any):

Belfast City Council is supportive of the direction to enable EV provision in residential parking. BCC is of the opinion that the provision of EV charging must meet the potential future demand of increased electric car usage and any proposal should be reflective of this.

Belfast City Council has commissioned an Electric Vehicle Strategy relating to the Belfast City area with aim of providing a comprehensive pathway for EV delivery in Belfast, at the scale required to meet the city's Net Zero targets. It is currently in draft form with consultation anticipated in late 2023/early 2024.

---

**Q.3E.4 Do you agree with the proposed limitations 1 and 2 (as outlined in paragraph 3E.34 and 3E.35) restricting the application of the requirements for EV infrastructure at parking spaces associated with new dwellings?**

Yes  No

Comments (if any):

In respect to the proposed limitation 2, electric vehicle charging does pose different challenges in respect to fire safety. As this is an emerging area and research is ongoing to determine appropriate mitigation measures, we would recommend that the department exercise caution when introducing facilities for EV charging.

In relation to charge points within single dwelling garages we again would recommend caution until further research is completed.

---

**Q.3E.5 Do you think there should be a limitation to the application of the requirements, on the grounds of additional grid connection costs that may accrue to developers as a result of the provision of CPs?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to provide guidance on this issue.

---

**Q.3E.6 If the answer to Q 3E.5 is yes, do you think the amount of £3600 (which is currently under review) is appropriate and do you have any comment on how it should be assessed?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to provide guidance on this issue.

---

**Q.3E.7 Do you agree that where a major renovation results in a residential building being associated with more than 10 parking spaces, then CPs should be provided at a rate of one per dwelling<sup>3</sup>, or one per associated parking space (whichever is the lesser) and that that ducting should be installed in each associated car parking space, to support the future installation of an EV CP?**

Yes  No

Comments (if any):

Please refer to answer Q.3E.3

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<sup>3</sup> this would apply to the existing dwellings- newly created dwellings would be addressed through the other routes (“new dwellings” or “a newly created dwelling by way of a material change of use”).

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**Q.3E.8 Do you agree with the proposed limitations to requirements in the case of major renovations, as outlined in paragraph 3E.41-3E.47?**

Yes  No

Comments (if any):

Please refer to answer Q.3E.3

---

**Q.3E.9 Do you agree that where a dwelling is created through a material change of use, a CP should be required at any parking space associated with the new dwelling?**

Yes  No

Comments (if any):

Please refer to answer Q.3E.3

---

**Q.3E.10 Do you agree with the proposed limitations to the application of the requirement, where a newly created dwelling is established under a material change of use, as outlined in paragraph 3E.51-3E.55?**

Yes  No

Comments (if any):

Belfast City Council welcomes the limitations, however for consistency, the proposals should be in-line with the new-build assessment.

The proposed limitations applicable to a material change of use will need to be clear to ensure a full understanding of the requirements, from a planning, design, construction and enforcement perspective. Example, within limitation 2 what is definition of a renovated car park, further information would be required.

---

**Q.3E.11 Should a cost cap apply, instead of limiting the number of CPs on the basis of the existing supply, where a new electrical supply connection to the building occurs alongside a major renovation, or a material change of use that creates a new dwelling?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to provide guidance on this issue.



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**Q.3E.12 Should there be a requirement for cable routes to all spaces associated with dwellings newly created by way of a material change of use, in circumstances where a building has more than 10 parking spaces?**

Yes  No

Comments (if any):

Whilst we are unable to advise on the adequacy of this proposal. For consistency, Belfast City Council would recommend the proposals be in-line with the requirements for new-build.

---

**Q.3E.13 Do you have any other views that you wish to provide on the EV section of the consultation (e.g. the minimum standard of EV charge point or safety and accessibility within the built environment)?**

Yes  No

Comments (if any):

Belfast City Council is very much supportive of the proposals. The goals around EV charging are rightly ambitious and need to be matched with the necessary N.I. Government investment in infrastructure development.

The policy goal is to be commended and certainly there needs to be a start in developing and implementing the infrastructure to allow personal transportation to continue as petrol and diesel cars are phased out.

## Section 4: Pre-consultation Phase 3 proposals for buildings other than dwellings

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### Section 4A: Part F (Conservation of fuel and power) proposals for new buildings other than dwellings Phase 3

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**Q.4A.1 Do you agree that the Department should adopt the same Primary energy metric for new non-domestic building assessments, as proposed for domestic buildings?**

Yes  No

Comments (if any):

Belfast City Council would agree with the proposed new primary energy metric as it is a more appropriate and accurate measurement of the actual energy used. The availability of low carbon energy use does not encourage better performing buildings. If we continue to use CO2 emissions as the primary performance metric for homes, it will not be possible to tell whether a property performs well under this metric because it is actually energy efficient, or if this is a consequence of a decarbonised electricity grid.

---

**Q.4A.2 Do you agree that the Department should develop proposals to adopt the Notional Building specification in line with England's Part L 2022 specification and requirements? If not, please provide evidence of why and how the specification should be altered.**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to inform the Department's direction of travel following England's Notional Building specification.

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**Q.4A.3 Do you agree that the Department should develop proposals to adopt the limiting fabric U-values in line with England's Part L 2022 requirements? If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.**

Yes  No

Comments (if any):

Belfast City Council would have no objection to following England's limiting u-values for consistency and to avoid having to make specific amendments to NCM software.

---

**Q.4A.4 Do you agree that the Department should develop proposals to adopt maximum permissible air-permeability values for new builds of 5.0 m<sup>3</sup>/(h.m<sup>2</sup>) @50Pa, or should it maintain consistency with England’s approach?**

Maximum of 5.0 m<sup>3</sup>/(h.m<sup>2</sup>) @50Pa  Maintain consistency with England.

Comments (if any):

From our experience within Belfast City Council, the air permeability of 8.0 m<sup>3</sup>/(h.m<sup>2</sup>) @ 50 Pa in the majority of cases is being exceeded, therefore BBC would welcome a maximum of 5.0m<sup>3</sup>/(h.m<sup>2</sup>)@50Pa.

Guidance in relation to ventilation will need to be mindful of any changes to the current air permeability rate.

---

**Q.4A.5 Do you agree that the Department should develop proposals to adopt the limiting services standards in line with the requirements in England, Wales and Scotland?**

**If not, please provide evidence of how the specification is impractical here and what alternative standard should be required.**

Yes  No

Comments (if any):

Belfast City Council has no objection to adopting the limiting services standards in line with the requirements in England, Wales and Scotland.

---

**Q.4A.6 Do you agree that the Department should develop proposals to include the limiting services standards within the Technical Booklet guidance documents, or is a more explanatory, separate Non-domestic Building Services Compliance Guide preferable? Please provide reasoning in your response.**

YES, services guidance should be within the Technical Booklet

NO, a separate NDBSCG is preferable

Comments (if any):

Belfast City Council welcomes the guidance in respect to building services and controls being brought into the new version of TBF2, from a designers and enforcers perspective it will provide a single source point for guidance and, hopefully, bring clearer structure to the technical booklet.

---

**Q.4A.7 Do you agree that the Department should develop proposals to require BACS in new buildings?**

**If so, should the threshold be at 290kW or 180kW? Please provide evidence or reasoning for your view.**

Yes  No

YES – at 290kW  YES – at 180kW

Comments (if any):

To align with other jurisdictions across the UK and Ireland, Belfast City Council has no objections to the introduction of BACS.

Belfast City Council has no suggestion or insight into what the threshold should be.

---

**Q.4A.8 What is your view on the value of requiring either TM54 modelling of actual energy use in buildings >1000m<sup>2</sup> (as applicable in England) or Scotland's conversion to Zero Direct Emissions Heating reports?**

Comments (if any):

Belfast City Council has no suggestion or insight on this matter.

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**Section 4B: Section 4B: Part F (Conservation of fuel and power) proposals for work to existing buildings other than dwellings Phase 3**

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**Q.4B.1 Do you support the addition of a Primary Energy metric assessment alongside the current Carbon emissions metric assessment when using the Equivalent Target Approach to demonstrate compliance in cases of work to existing buildings?**

Yes  No

Comments (if any):

Belfast City Council would welcome the addition of a Primary Energy and FEES metric alongside Carbon emissions metric when using the Equivalent Target Approach as this will bring it in-line with the new-build proposals.

---

**Q.4B.2 Do you have any particular comment, concern or insight on the U-values used for standards related to existing buildings in any of the various situations in other administrations?**

Yes  No

Comments (if any):

Belfast City Council has no insight on the u-values for standards related to existing buildings in other administrations.

---

**Q.4B.3 Do you agree that our U-value standards should be largely in line with limiting standards for new buildings in cases of extensions and replacement elements on buildings other than dwellings?**

Yes  No

Comments (if any):

Design u-values being aligned for both new build and extensions would aid with consistency regardless of build type.

---

**Q.4B.4 Do you agree that our U-value standards should be largely in line with the values used in England, in cases of a material change of use of a building, for renovated elements and where a change of energy status occurs involving buildings other than dwellings?**

Yes  No

Comments (if any):

Belfast City Council would have no objection to following England's values, in the case of material change of use, renovated elements or change of energy status.

---

**Q.4B.5 Are there any particular areas where alternative performance values for renovated elements or services should be considered for buildings other than dwellings? If so please provide evidence and an indication of the value you consider appropriate.**

Yes  No

Comments (if any):

Belfast City Council has no comment to make on this question.

**Q.4B.6 Do you agree that a maximum glazing area assessment should continue to form part of the requirements for extensions and be included where a material change of use occurs to buildings other than dwellings?**

Yes  No

Comments (if any):

We have no objection to continuing an assessment against the amount of glazing used, this is currently being used and used by industry.

---

**Q.4B.7 Do you agree that traditional construction should be referenced out to third party guidance, with a greater scope for bespoke consideration in situations applicable to traditionally constructed buildings other than dwellings?**

Yes  No

Comments (if any):

Belfast City Council sees the value on seeking expert advice in respect to traditional construction type buildings to avoid future problems.

Belfast City Council would welcome a definition for what building types fall within traditional construction.

---

**Q.4B.8 Do you agree that where a new or complete replacement heating system is being installed in an existing building, it should be installed to operate with a maximum flow temperature of 55°C?**

Yes  No

Comments (if any):

Belfast City Council agrees with the introduction of proposed low temperature systems if it will help future-proof homes for different types of low carbon heating.

---

**Q.4B.9 Do you agree that Technical Booklet F2 should be amended to follow the minimum services provisions of Section 5 and 6 of England’s Approved Document L2, subject to further NIBRAC and public consultations? The Department would be grateful to understand any ‘lessons learned’ from the roll-out of these provisions elsewhere.**

Yes  No

Comments (if any):

Belfast City Council has no information or evidence to help the Department in this regard.

---

**Q.4B.10 Do you have any evidence on the success or otherwise of consequential improvements? If so, please include this with your response.**

Yes  No

Comments (if any):

From Belfast City Council’s experience, the requirement to comply with consequential improvements is rarely applicable in domestic properties however it is not uncommon in non-domestic building applications. In most applications consequential improvements are incorporated successfully as part of planned alterations to the original part of the property. Alternatively, the applicant provides evidence that improvements are not technically, functionally, or economically feasible. We would note that the verification of the evidence provided can sometimes be difficult to substantiate.

---

**Q.4B.11 Do you think consequential improvement requirements should be—**  
**a. retained (i.e. maintained in keeping with England),**  
**b. amended (for example to apply where the principal works are of a particular value, rather than being based on the total floor area of the existing building),**  
**c. extended to apply to all extensions, or otherwise extended; or**  
**d. revoked?**

**Please provide a reasoning for your response and evidence that supports any changes you would propose.**

a  b  c  d

Comments (if any):

Consequential improvements are well established in the Building Regulations and we have no reason to change the current requirements.

---

**Q.4B.12 Do you have any evidence or insight on the major renovations measures in place in the Republic of Ireland to suggest the Department should prioritise a similar approach here for buildings other than dwellings? If so please include the evidence with your response.**

Yes  No

Comments (if any):

Belfast City Council has no insight on major renovation measures in the Republic of Ireland.

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**Section 4C: Part K (Ventilation) buildings other than dwellings  
Phase**

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**Q.4C.1 Do you agree that Technical Booklet K should take a similar approach to noise and installation of ventilation systems, as England and Wales?**

Yes  No

Comments (if any):

Belfast City Council has no objection in following a similar approach to England and Wales.

---

**Q.4C.2 Do you agree that Technical Booklet K should replicate the proposed performance based guidance outlined for dwellings?**

Yes  No

Comments (if any):

If the performance specification is more reflective of actual pollutants, then we would support the change.

---

**Q.4C.3 Do you agree that Technical Booklet K (TBK) should bring the Appendix D guidance on polluted external air into the main body text of TBK?**

Yes  No

Comments (if any):

The Council would welcome having appendix D within the main body of text in TBK.



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**Q.4C.4 Do you agree that the list of sources for design guidance provided in Annex F should be replicated in the new TBK, for application to specialist building types?**

Yes  No

Comments (if any):

Yes, we would see this as a better option than what currently exists in TBK 2012 and it provides a good reference point for users of the document.

---

**Q.4C.5 Are there any specific concerns or issues with the updated references proposed in the Table in Annex F, that the Department should consider? If so, please provide details.**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed response on this question.

---

**Q.4C.6 Do you agree that requirements for air quality monitoring, similar to those introduced in England and Wales, should be included in the Phase 3 uplift package to Part K (Ventilation)?**

Yes  No

Comments (if any):

Belfast City Council has no objection in following a similar approach to England and Wales.

---

**Q.4C.7 Do you agree that requirements for increased ventilation rates to certain higher risk spaces, similar to those in England and Wales, should be introduced in Phase 3?**

Yes  No

Comments (if any):

**4C.7 Question omitted following correction issued October '23**

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**Q.4C.8 Do you agree that additional requirements for ventilation in offices, similar to those introduced in England and Wales, should be included in the Phase 3?**

Yes  No

Comments (if any):

Belfast City Council has no objection in following a similar approach to England and Wales.

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**Section 4D: Electric vehicle infrastructure- Phase 3 proposals for buildings other than dwellings**

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**Q.4D.1 Do you agree with the proposed use of Building Regulations to implement Article 8.2 for the provision of EV charging point infrastructure at buildings other than dwellings?**

Yes  No

Comments (if any):

Belfast City Council consider that Building Regulations is not an ideal statutory instrument to legislate for EV infrastructure requirements. A Building Regulations application is late in the design process of a construction project and the planning of CP's would be better suited at a much earlier stage. It would not be uncommon for large multi-site developments to be split into smaller applications and therefore CP's may not be included if applications were staged in such a manner either purposefully or naturally.

In most instances Building Regulations do not consider areas outside the vicinity of the property nor requirements relating to parking provision.

---

**Q.4D.2 Do you agree that ducting infrastructure for one in five parking spaces and one CP, should be installed when a non-residential buildings with more than 10 non-residential car parking spaces is being erected or is undergoing a major renovation?**

Yes  No

Comments (if any):

Belfast City Council is supportive of the direction to enable EV provision in non-residential parking. BCC is of the opinion that the provision of EV charging must meet the potential future demand of increased electric car usage and any proposal should be reflective of this.

---

**Q.4D.3 Do you agree with the proposed limitations (outlined in para 4D.13-4D.18) to the application of EV charging requirements for new non-residential buildings and for major renovations of such buildings? If not, please comment on how should they should be changed.**

Yes  No

Comments (if any):

In respect to the proposed limitation 2, electric vehicle charging does pose different challenges in respect to fire safety. As this is an emerging area and research is on-going to determine appropriate mitigation measures, we would recommend that the department exercise caution when introducing facilities for EV charging.

In respect to limitation 3 we would welcome clarification on the definition of car-park.

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**Q.4D.4 Do you agree that more onerous residential requirements should apply in mixed-use building situations and shared parking arrangements?**

Yes  No

Comments (if any):

Belfast City Council is of the opinion that the provision of EV charging must meet the potential future demand of increased electric car usage and any proposal should be reflective of this.

## Section 5: Considerations for Phase 4 uplifts

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**Q.5.1 Do you agree that, for Phase 4, the Department should expect to replicate measures introduced in England’s Future Homes and Future Buildings (2025) in the first instance, or is there a particular administration that we should seek to align with for Phase 4? If possible, please provide supporting evidence for your preference?**

Yes  No

Comments (if any):

Belfast City Council would need more time to complete research before giving an informed answer.

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**Q.5.2 Would you support a ban on direct emissions heat generators or combustion appliances, similar to Scotland’s measures banning such appliances? (Please take into account your answer to Question 3A.23 on which Option you have supported.)**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed response on this question.

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**Q.5.3 Do you support efforts to more closely align the NCM and targets towards passive house standards, where possible?**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to make an informed response on this question.

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**Q.5.4 Have you any advice or evidence as to how further verification measures might help ensure the standard is delivered in practice (please provide details)?**

Yes  No

Comments (if any):

**Q.5.5 Are there any other particular or detailed issues that the Department should be considering for new build Part F requirements for non-domestic buildings as part of Phase 4 developments?**

Yes  No

Comments (if any):

Belfast City Council is not aware of any issues at the present time.

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**Q.5.6 Are there any other issues which the Department should be considering for Phase 5? Please note that some further/concurrent issues are discussed in Section 6 which may influence input on this.**

Yes  No

Comments (if any):

## Section 6: Concurrent issues - headline summary

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### Section 6A: National Calculation Methodology issues

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**Q.6A.1 Do you agree that the local NCM should be consistent with England? If not, please provide any particular thoughts on how it should be varied, for example with the use of a local NI weather file, or with local cost or carbon intensity factors, rather than UK averages, in building regulation assessments.**

Yes  No

Comments (if any):

Belfast City Council has no evidence or information to inform this decision.

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### Section 6B: Embodied Carbon

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**Q.6B.1 Do you have any comments on EPDs that you would like to bring to the attention of the Department at this stage?**

Yes  No

Comments (if any):

Belfast City Council has no comment to make in respect to EPDs.

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**Q.6B.2 Have you any insight or evidence on the likely professional costs incurred in carrying out a whole lifecycle assessment of carbon in a project? For example, is it likely to be comparable to the cost of a traditional Bill of Quantities? If so, what phases of the lifecycle assessment and data were included?**

Yes  No

Comments (if any):

No, Belfast City Council has no evidence on this matter.

**Q.6B.3 Have you any opinion or insight on how to address any of the challenges listed? For example, a view on the extent and scope of assessments.**

Yes  No

Comments (if any):

No, Belfast City Council has no further opinion.

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**Q.6B.4 Do you agree that the intricacies and implications of embodied carbon mean that it is best considered at a UK wide level and that the Department should concentrate efforts on attending to the current gap in standards compared to other regions, in the first instance?**

Yes  No

Comments (if any):

Belfast City Council has no comment to make in this regard.

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**Q.6B.5 Would you support the development of an advisory Information Note or Appendix to Technical Booklets on Part F to support embodied carbon assessment?**

Yes  No

Comments (if any):

Belfast City Council has no comment to make in this regard.

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**Q.6B.6 Have you any practical suggestions for how circular economy principles may be best encouraged in construction or, if necessary, regulated for in the future?**

Yes  No

Comments (if any):

Belfast City Council has no comment to make in this regard.

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## Section 6C: Over-sized new homes

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**Q.6C.1 Have you any evidence on new-build dwelling sizes that should be taken into account in future policy making on larger dwellings?**

Yes  No

Comments (if any):

Belfast City Council has no evidence to inform future policy making.

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**Q.6C.2 Do you believe that action should be taken to better highlight the higher total energy demand for large, less spatially efficient dwellings? If so, how should this be best achieved?**

Yes  No

Comments (if any):

Belfast City Council has no comment to make in this regard.

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## Section 6D: Performance gap

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**Q.6D.1 Do you have any particularly local evidence on design vs as-built performance gaps?**

Yes  No

Comments (if any):

It is not unusual for variations to take place between the design phase and what is actually built on-site and it would not be uncommon for works to commence prior to obtaining a set of approved plans, this can impact on the performance gap. As in Scotland consideration might be given to introducing into regulation that site works cannot commence without plan approval.

Further guidance within the technical booklet on how the performance gap can be reduced would be useful tool for all stakeholders.

Performance gaps are significantly reduced when there is greater oversight of projects, whether this is from clerk of works, architects or engineers etc. However, this is often driven by available finances and in many cases, developers are building to maximise profit over quality.

We would propose that those involved in the design and construction of buildings should be able to provide information to confirm the build quality, such as is being suggested through the use of BREL.



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**Q.6D.2 Do you have any evidence or insight supporting specific actions to address specific performance gaps in Parts F or K of the Building Regulations?**

Yes  No

Comments (if any):

Pleas see response in question Q.6D.2