



Llywodraeth Cymru
Welsh Government

Number: WG52381

Welsh Government Consultation response form

Building Regulations Part L 2025 Review Changes to Part L (conservation of fuel and power), Part O (overheating) and Part F (ventilation) of the Building Regulations for dwellings and non-domestic buildings

Date of issue: 26 August 2025

Action required: Responses by 17 November 2025

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg /
We welcome correspondence and telephone calls in Welsh

Overview

The Building Regulations and the associated guidance set out in Approved Documents seek to ensure buildings meet certain standards for minimum health, safety, welfare, convenience and sustainability.

This document covers proposals for changes relating to Part L (conservation of fuel and power), Part O (overheating) and Part F (ventilation) for dwellings and non-domestic 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.

How to respond

Submit your response by 17 November 2025, in any of the following ways:

- Complete our [online form](#)
- Download, complete our [response form](#) and email: enquiries.brconstruction@gov.wales
- Download, complete our [response form](#) and post to:
Building Regulations, Welsh Government, Rhyd-y-car, Merthyr Tydfil
CF48 1UZ

Please include the reference WG52381 - Changes to the Building Regulations in Wales for dwellings and non-domestic buildings.

When you reply, it would be useful if you confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- your name,
- your position (if applicable),
- the name of organisation (if applicable),
- an address (including post code),
- an email address, and
- a contact telephone number

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

Contact details

For any enquiries about the consultation please contact the Welsh Government Building Regulations team by emailing: enquiries.brconstruction@gov.wales

For further information:

Building Regulations, Welsh Government, Rhydycar, Merthyr Tydfil
CF48 1UZ

Telephone: 0300 062 8144

This document is also available in Welsh: [Adolygiad 2025 o Ran L o'r Rheoliadau Adeiladu](#)

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

Date: 17 November 2025

Your Name: Max Hampton

Your Position (if applicable): Design Advisor

Your Organisation (if applicable): Design Commission for Wales

Email / Telephone Number: max.hampton@dcfw.org

Your Address: Cambrian Buildings, Mount Stuart Square, Cardiff, CF10 5FL

Type of Organisation: Choose one of the following:

- Builder/Developer ☐
- Small/medium builder ☐
- Volume house builder ☐
- Designer/Engineer/Surveyor ☐
- Local Authority ☐
- Registered Building Control Approver ☐
- Architect ☐
- Manufacturer/supply chain ☐
- Energy Assessor ☐
- Energy sector ☐
- Construction Professional ☐
- Property Manager/Housing Association/Landlord ☐
- Building Occupier/Resident ☐
- Other Interested Party (please specify) ☒

The Design Commission for Wales is the national advisory body for the promotion of design excellence across the built environment in Wales.

Question 1

What level of uplift to the energy efficiency standards (i.e. improvements to the targets for performance metrics (see paragraph 2.42 for proposed metrics) in the Building Regulations should be introduced for the Part L 2025 standard?

- Option 1 (the government's preferred option) ☒
- Option 2 ☐
- Other ☐

Please explain your reasoning.

We support the Welsh Government's intent to increase energy efficiency standards. Option 1 provides a good balance of performance and cost.

Question 2

Do you agree with the concerns raised in paragraph 2.7 regarding MVHR systems at this time?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning or how these concerns could be overcome in the future.

We agree that there should be flexibility in design approach.

Question 3

Do you agree that new dwellings and new non-domestic buildings should be permitted to connect to heat networks, if those networks can demonstrate they have sufficient low-carbon generation to supply the buildings' heat and hot water demand at the target CO₂ levels for the Part L 2025 Standard?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

Question 4

Do you agree that newly constructed district heating networks (i.e. those built after the Part L 2025 Standard comes into force) should also be able to connect to new buildings using the sleeving methodology?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

It is however crucial that no new fossil-fuel connections are allowed, including heat networks, to avoid prolonging fossil-fuel life.

Question 5

Do you agree with the proposed guidance on sleeving outlined for Heat Networks included in Approved Document L, Volume 1: Dwellings and Approved Document L, Volume 2: Buildings other than dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 6

Are there alternative arrangements for heat networks under the Part L 2025 Standard that you believe would better support the expansion and decarbonisation of heat networks?

Question 7

Do you agree that new residential buildings served by communal heating systems should be compared to the proposed Part L 2025 notional standard with an individual ASHP?

- Yes ☐
- No ☐
- Unsure ☒

Please provide further details.

Question 8

Should the notional dwelling heat loss calculation be based on a single weather location (Cardiff)?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 9

Do you agree with the revised guidance in Approved Document L, Volume 1: Dwellings for consultation no longer including the average compliance approach for terraced houses?

- Yes ☐
- No ☐
- Unsure ☒

Please provide any evidence you have on the unintended consequences that could arise as a result of these changes.

The form factor benefits of terraced housing should be recognised.

Question 10

Do you agree with the revised guidance in Approved Document L, Volume 1: Dwellings which states that you should not provide a chimney or flue when no secondary heating appliance is installed?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

We discourage the installation of 'decorative' faux chimneys.

Question 11

Do you agree with the proposed approach to determine U-values of windows and doors in new dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 12

Do you consider that a Part L requirement for renewable energy (with guidance given in Approved Document L) should be implemented rather than being included in the notional dwelling specification for new dwellings?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

We encourage an approach that allows design flexibility to meet the target uplift.

Question 13

Do you have any information you would like to provide on the dwellings built to the Part L 2025 Standard using curtain walling?

Curtain walling allowance requires careful consideration with developers of tall flats and needs to avoid making it unrealistically expensive to build.

Question 14

Do you agree with the replacement of the Dwelling Energy Efficiency Rate with the Energy Use Intensity?

- Yes ☒
- No – the Dwelling Energy Efficiency Rate should be retained ☐
- No – an alternative metric should be used (please provide details) ☐
- No – the Dwelling Energy Efficiency Rate should be removed with no additional metric added ☐

Energy Use Intensity reflects a fundamental reality rather than calculated CO₂ emissions.

Question 15

Do you agree that the Home Energy Model should be adopted as the approved calculation methodology to demonstrate compliance of new dwellings with the Part L 2025 Standard in Wales?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

Question 16

Do you agree that SAP should continue to be used to demonstrate compliance with Part L 2025 as an interim measure if the final version of HEM is not completed by the proposed coming into force date?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 17

Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 18

Do you agree with the proposal to include additional guidance around heat pump controls for dwellings, as set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 19

Do you agree that operating and maintenance information should be fixed to heat pump units in new dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 20

Do you think that the operating and maintenance information set out in Section 10 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure that heat pumps are operated and maintained correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 21

Do you agree with the proposed changes to Section 4 of draft Approved Document L, Volume 1: Dwellings, designed to limit heat loss from low carbon heating systems?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 22

Do you agree with the proposed sizing methodology for hot water storage vessels for new dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 23

Do you agree with the proposed changes to Approved Document F, Volume 1: Dwellings to improve the installation and commissioning of ventilation systems?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 24

Do you think the guidance on commissioning hot water storage vessels in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 25

Are you aware of any gaps in our guidance around commissioning heat pumps, or any third-party guidance we could usefully reference?

- Yes ☐
- No ☐
- Unsure ☒

If Yes, please provide further details.

Question 26

Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 27

Do you agree with proposed changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to (a) clarify the options for certifying fixed building services installations and (b) set out available enforcement options where work does not meet the required standard?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 28

Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 29

Do you agree with the proposal to include additional guidance around heat pump controls for dwellings, as set out in Section 6 of draft Approved Document L, Volume 1: Dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 30

Do you agree that operating and maintenance information should be fixed to heat pump units in existing dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 31

Do you think that the operating and maintenance information set out in Section 10 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure that heat pumps are operated and maintained correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 32

Do you agree with the proposed changes to Section 4 of draft Approved Document L, Volume 1: Dwellings, designed to limit heat loss from low carbon heating systems?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 33

Do you agree with the proposed sizing methodology for hot water storage vessels for new dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 34

Do you agree with the proposed changes to Approved Document F, Volume 1: Dwellings to improve the installation and commissioning of ventilation systems?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 35

Do you agree with proposed changes to Approved Document F, Volume 1: Dwellings to (a) provide guidance for a requirement to provide falls for horizontal extract ducting, and condensate traps with drainage for vertical ducting to discharge condensation water that may accumulate within the ductwork, and (b) include an explanatory diagram to reinforce the principles of the requirement?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 36

Do you think the guidance on commissioning hot water storage vessels in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 37

Do you think the guidance for commissioning on-site electrical storage systems in Section 8 of draft Approved Document L, Volume 1: Dwellings is sufficient to ensure they are commissioned correctly?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 38

Do you agree with proposed changes to Approved Document L, Volume 1: Dwellings and Approved Document F, Volume 1: Dwellings to (a) clarify the options for certifying fixed building services installations and (b) set out available enforcement options where work does not meet the required standard?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 39

Do you agree with the proposal to introduce a requirement to install renewable technology when a dwelling is significantly extended?

- Yes ☒
- No ☐
- Unsure ☐

If No, please explain your reasoning.

The visual appearance of any renewables kit, particularly in conservation areas and on listed buildings, will require a degree of balance.

Question 40

Do you agree with the proposed definition for a 'significant extension'?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 41

Do you agree with the methods proposed for the simple and flexible approaches?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

We welcome the proposed flexibility in the design solution.

Question 42

Do you agree with the proposed exemptions?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 43

Are there any other aspects of the Building Regulations or associated Approved Document guidance, for example on safety or other building standards, which should be reviewed or updated to account for this new proposal?

Question 44

Do you agree with the proposal to extend Part O of the Building Regulations to capture works on existing dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 45

Do you agree with the proposal to introduce additional commentary in Approved Document O: overheating on new extensions to existing dwellings where there is a relatively high percentage of glazing in the extension?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 46

Do you agree with the proposal to introduce new guidance in Approved Document O: overheating on replacement of window(s) in highly glazed flats?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 47

Do you agree with the proposal to introduce new guidance in Approved Document O: overheating on loft conversions to habitable rooms with new window(s) / rooflight(s) / dormer window(s)?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 48

What level of uplift to the energy efficiency standards in the Building Regulations should be introduced in 2025?

- No change ☐
- Option 1 – 78% CO₂ reduction ☐
- Option 2 – 94% CO₂ reduction ☒
- Other ☐

Please explain your reasoning.

We support the principle of an uplift in the energy efficiency standards and are therefore supportive of Options 1 and 2. The figure should be ambitious but informed by what is achievable in balance with other design considerations.

Question 49

Do you agree with the methodology outlined in the NCM modelling guide for the Part L 2025 Standard?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 50

Please provide any further comments on the cSBEM tool which demonstrates an implementation of the NCM methodology.

Question 51

Please provide any further comments on the research documents provided alongside the cSBEM tool and which support the development of the NCM methodology, SBEM and iSBEM.

Question 52

Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 2: Buildings other than dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 53

Do you agree with the proposed change in the requirements for when BACs are required in buildings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 54

Do you agree with the proposed guidance on the insulation standard for building heat distribution systems in Approved Document L, Volume 2: Buildings other than dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 55

Do you agree that the current guidance for buildings with low energy demand which are not exempt from the Building Regulations, as described in Approved Document L, Volume 2: Buildings other than dwellings should be retained without amendment?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 56

Do you agree that lifts, escalators and moving walkways in new buildings (but not when installed within a dwelling) should be included in the definition of fixed building services?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 57

Do you agree with the proposed guidance for passenger lifts, escalators and moving walkways in draft Approved Document L, Volume 2: Buildings other than dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 58

Do you have any further comments on any other changes to the proposed guidance in draft Approved Document L, Volume 2: Buildings other than dwellings?

- Yes (please provide comments) ☐
- No ☒
- Unsure ☐

Question 59

Do you agree with the introduction of photographic evidence as a requirement for producing the as-built energy assessment for new non-domestic buildings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning.

Question 60

Do you agree with the proposed changes to minimum building services efficiencies and controls set out in Section 6 of draft Approved Document L, Volume 2: Buildings other than dwellings?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 61

Do you agree that the current guidance for buildings with low energy demand which are not exempt from the Building Regulations, as described in Approved Document L, Volume 2: Buildings other than dwellings should be retained without amendment?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 62

Do you have any comments on the changes to the proposed guidance in draft Approved Document L, Volume 2: Buildings other than dwellings?

- Yes (please provide comments) ☐
- No ☒
- Unsure ☐

Please explain your reasoning.

Question 63

Do you agree that Part L1 of Schedule 1 should be amended, as above, to require that reasonable provision be made for the conservation of energy and reducing carbon emissions?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

Question 64

Do you agree that regulations 25A and 25B will be redundant following the introduction of the Part L 2025 Standard and can be repealed?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Question 65

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

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning and provide evidence to support this.

Question 66

Overall, do you think the impact assessment is a fair and reasonable assessment of the potential costs and benefits of the proposed options for new dwellings?

- Yes ☐
- No ☐
- Unsure ☒

If No, please explain your reasoning and provide evidence to support this.

Question 67

Which option describing the timescale between laying the regulations and them coming into force for the Part L 2025 Standard do you prefer?

- Option 1 (6 months) ☒
- Option 2 (12 months) ☐

Please use the space provided to provide further information and/or alternative arrangements.

Question 68

Will the changes to Building Regulations proposed in this consultation lead to the need to amend existing planning permissions? If so, what amendments might be needed and how can the planning regime be most supportive of such amendments?

- Yes ☐
- No ☐
- Unsure ☒

Please explain your reasoning.

Consideration should be given to how the planning system can support managing the sensitive integration of renewables technology, particularly in conservation areas and on listed buildings.

Question 69

Do you agree that the 2010 and 2014 energy efficiency transitional arrangements should be closed down, meaning all new buildings that do not meet the requirements of the 2025 transitional arrangements would need to be built to the Part L 2025 standard?

- Yes ☒
- No ☐
- Unsure ☐

Please explain your reasoning.

Question 70

What, in your opinion, would be the likely effects of the proposals on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

Do you think that there are opportunities to promote any positive effects?

Do you think that there are opportunities to mitigate any adverse effects?

Question 71

In your opinion, could the proposals be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Question 72

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

We encourage the review of Building Regulations to consider how energy systems are now more integrated. For example, electric vehicles are now an active player in our homes.

Next Steps

This consultation will close on 17 November 2025. Responses to this consultation will be analysed and a Welsh Government Response will follow.