

Association for Environment Conscious Building



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Head of Buildings Division
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SW1E 5LP

Proposals for amending Part L of the Building Regulations and implementing the Energy Performance of Buildings Directive

Oct 20th 2004

Dear Sir,

In response to the above consultation document please find attached the response form from the Association for Environment Conscious Building.

We would like to highlight the following points.

- We welcome the fact that in the proposed changes to AD L there is now a social cost of carbon.
- We feel that carbon efficiency rather than energy efficiency should be the defining parameter for any changes to Part L. Under such a premise the carbon rating of fuel becomes of paramount importance.
- Both design of buildings and as built performance must be addressed under any changes. This means that the U values of the building fabric must take thermal bridging into account.
- We welcome the introduction of random sample pressure testing of new build dwellings.
- We welcome the upgrading of minimum boiler standards in new dwellings to be band A and B SEDBUK rated.
- Future proofing of all buildings to accept solar thermal or PV systems is vital

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- The IAGs need more input from environmental pressure groups such as ourselves rather than just industry pressure groups.
- The changes to the 2005 amendments were very rushed. More time needs to be allowed for the 2010 amendments to properly reflect the UK's commitment to reducing its carbon emissions and to be part of a coherent low carbon strategy across all Government departments. The AECB would like to be involved in the changes at an earlier stage and at a more strategic level.

Should you wish to discuss any aspect of our response then please contact me either by telephone on 020 8800 4157 or by email at ech2o@aecb.net

Yours sincerely

Cath Hassell
Committee member of the AECB

The Association for Environment Conscious Building (AECB) was formed in 1989 to encourage greater environmental awareness within the UK construction industry. Our membership of over 1300 is very diverse and encompasses almost every sector of building design, construction and management, as well as manufacturers, suppliers and distributors of environmentally sustainable goods. The AECB charter encourages our members to persevere towards ever-improving environmental standards in exchange for dedicated support and promotion from the association.