



Part G Consultation
Sustainable Buildings Division
Communities and Local Government
Floor 2, Zone J6
Eland House
Bressenden Place
LONDON
SW1E 5DU

T/01/GRP

4 August 2008

Dear Sir/Madam

Proposals for amending Part G (Hygiene) of the Building Regulations and Approved Document G consultation

The Home Builders Federation (HBF) is the trade association representing the interests of private house builders in England and Wales. Our member firms account for approximately 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national household names through regionally based businesses and small local companies.

Enclosed is our response to the questions posed in the above consultation. However, for a number of reasons, we believe that this proposed amendment to Part G should not at this time go ahead.

We believe that it would be better to look at the principles involved in 'The Future of Building Control' document, which talks about merging and reducing the number of Approved Documents, and combine Parts G and H.

As we have indicated in our response there are a number of areas where the proposals in Part G have a bearing on Part H and it would be a good opportunity to look at these and thus avoid any unintended consequences. It would also indicate that you are serious about 'The Future of Building Control' document which, in the long term, should make all stakeholders' lives easier.

Member of the 
European Union of
Developers & House Builders



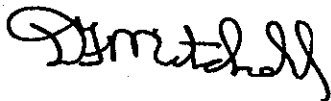
PRINTED ON RECYCLED PAPER

Whilst we appreciate there is never a right time to do this the current market conditions for our industry mean that housebuilders are only producing half the number of homes they were a year ago so the effect of delaying Part G would not be that onerous. We are also in a period where certainly this year and most probably next year the UK will not experience any water shortages.

Given the current regulatory burden, a postponement would also help housebuilders at a time when, to be quite frank, they are not sure if they will even have a business in the near future.

We would welcome the opportunity to discuss the issues and to explore the options further.

Yours faithfully

A handwritten signature in black ink, appearing to read 'D F Mitchell', written in a cursive style.

D F Mitchell
Technical Director

Annex A

RESPONSE FORM

Proposals for amending Part G (Hygiene) of the Building Regulations and Approved Document G: Consultation

Respondent Details:	
Name: D F Mitchell	Please return by: 5 August 2008 to: Part G Consultation Sustainable Buildings Division Communities and Local Government Floor 2, Zone J6, Eland House, Bressenden Place, London, SW1E 5DU Email: partgconsultation@communities.gsi.gov.uk Fax: 0207 944 5719
Organisation: HBF	
Address: First floor Byron House, 7-9 St James's Street, LONDON, SW1A 1DW	
Telephone: 020 7060 1600	
Fax: 020 7960 1601	
e-mail: dave.mitchell@hbf.co.uk	
Is your response confidential? If so please explain why. (See disclaimer on page 9) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Comments:	

Provision is made throughout this questionnaire for you to provide additional comments. If, however you wish to provide more detailed comments on any aspect of the consultation then please feel free to append additional materials and supplementary documents, clearly marked and cross referenced to the relevant questions, as necessary.

The Department of Communities and Local Government wishes to engage better with its stakeholders by automatically notifying you of changes to the regulations and approved documents and of consultations on building regulations issues. Because of the UK Data Protection Act 1998 we need your consent before we can do this. Please indicate your consent by ticking the consent box below.

I/We hereby consent to the recording, storage and processing of my/our personal information by the Department of Communities and Local Government, and any data processor you may use, for the purpose of enabling stakeholder engagement

Organisation type (tick one box only)

House or property developer	<input type="checkbox"/>	Approved Inspector - Corporate - Individual	<input type="checkbox"/> <input type="checkbox"/>
Commercial Developers	<input type="checkbox"/>	Local authority – other (please specify)	<input type="checkbox"/>
Housing Association (Registered Social Landlords)	<input type="checkbox"/>	Fire & Rescue Authority	<input type="checkbox"/>
Property Management	<input type="checkbox"/>	Other non-governmental organisation	<input type="checkbox"/>
Builder – Main Contractor (commercial/volume housebuilder)	<input type="checkbox"/>	Householder	<input type="checkbox"/>
Builder – Small Builders (repairs/maintenance/extensions)	<input type="checkbox"/>	Trade body or association	<input checked="" type="checkbox"/>
Builder – Specialist Sub Contractor	<input type="checkbox"/>	Research/academic organisation	<input type="checkbox"/>
Manufacturer	<input type="checkbox"/>	Professional body or institution	<input type="checkbox"/>

Architects	<input type="checkbox"/>	Testing bodies	<input type="checkbox"/>
Civil/Structural Engineer	<input type="checkbox"/>	Specific interest or lobby group	<input type="checkbox"/>
Consultancy	<input type="checkbox"/>	Journalist/media	<input type="checkbox"/>
Individual in practice, trade or profession	<input type="checkbox"/>	Insurer	<input type="checkbox"/>
Local authority – Building Control	<input type="checkbox"/>	Other (please specify):	<input type="checkbox"/>
	<input type="checkbox"/>		<input type="checkbox"/>
	<input type="checkbox"/>		<input type="checkbox"/>
Geographical Location			
England	<input type="checkbox"/>	Wales	<input type="checkbox"/>
England and Wales	<input type="checkbox"/>	Other (please specify)	<input type="checkbox"/>

Cold Water Services

Q1. Requirement G1(1) would incorporate the requirements of existing legislation and standards on the provision of water and would provide a better understanding and visibility of requirements for water supplies in buildings. Some stakeholders have suggested that this requirement for the supply of water to all buildings would aid compliance and should not bring about additional costs. However, we would like to consider this further. Do you agree that this proposal would be beneficial and would not bring extra costs?

Yes: **No:** **Don't know:**

Comments: Why has the opportunity not been taken to consider Parts G and H together and even to look at merging the two Parts as they cover related areas and would benefit from a more coherent approach to review. This would correspond to the intentions of the recent consultation on The Future of Building Control.

Q2. Requirement G1(1) would clarify the provisions for the supply of a wholesome water supply to buildings (subject to the exemptions in the Building Regulations) where drinking water is drawn off, where food is prepared or where sanitary appliances are used for personal washing. Is it reasonable to expect all buildings in this context to be connected to a wholesome supply of water?

Yes: **No:** **Don't know:**

Comments: (e.g. are there any additional types of buildings that should be excluded?) We would anticipate that a wholesome water supply would be required for all buildings. Even where drinking water or sanitary appliances are not required there is still the issue of a supply of clean water for first aid purposes.

Q3. Requirement G1(1) specifies that wholesome water be provided to locations where drinking water is drawn off, where food is prepared and where sanitary appliances are used for washing (e.g. basins, baths, showers). Are there any other points in a building (including dwellings) where you would consider wholesome water is essential?

Yes: **No:** **Don't know:**

Comments: It is essential that all locations where water is supplied should have a connection to wholesome water. Any attempts to supply alternative qualities of water can only be considered after a rigorous assessment of the risks to public health and, assuming that there is an acceptance that current standards for water supply can and should be reduced this could only be where such supplies could be guaranteed not to pose a risk to human health. While it is possible that some industrial processes can (and probably already do) use non-wholesome water, it is imperative that people are not exposed to any unreasonable risk – this is the reason why the legislation was introduced in the first place. There is evidence that even where approved systems are in

place there remains a risk to human health arising from potential negligence or poor maintenance or even accidental consumption of non-wholesome water. It must be remembered that even filtered rainwater offers potential for bacterial growth in very short periods of time such that there remains a risk, albeit quite small. Even assuming that comprehensive research provided guaranteed solutions (a situation that is far from the case at this point in time) it would be better to state the uses where it is deemed safe to use non-wholesome water rather than issue a restrictive list of where wholesome water is required. This means that any use not on the list would default to the safer option. However, this would still mean that a dual supply must be installed (and maintained to avoid any potential for cross-contamination). Even in areas of high rainfall there would be times when the supply was insufficient and a back up supply of wholesome water would have to be made available for flushing toilets etc. Safe time limits for storage of non-wholesome water would need to be specified (and agreement reached on what those targets might be eg should they be shorter in periods of hot weather and how would this be controlled etc etc). Given the need to switch supply and the difficulties in guaranteeing that there is no cross-contamination the use of non-wholesome water is only an option in a comprehensively managed site and it is unlikely to be a safe option for individual dwellings.

Apart from the potential for cross-contamination, what are the performance implications for using dirtier water for low flush toilets or flow restrictors – will higher level of impurities degrade their use over time? Also, at present virtually all washing machines, dishwashers etc are designed to use wholesome water. The use of eg harvested rainwater could adversely affect the performance and durability of such equipment and indeed negate any guarantees issued by the manufacturer.

There would always need to be a supply of wholesome water to cover all eventualities as an option, even if there were also a supply of non wholesome water. And the two supplies would need to be separated with no possibility of cross contamination plus any stored non-wholesome water would need to be controlled and only retained for a “safe” period of time and it is difficult to see how this could be adequately managed in a domestic setting. It is possible that managed sites, if there were sufficient space on site could incorporate managed systems for controlling eg harvested rainwater but on a dense inner city housing site there will be inadequate space to allow this. Underground water tanks are not feasible in many locations and rainwater harvesting is only viable in areas of high rainfall where there is actually no need to conserve water anyway. Even a use such as watering of landscapes could still pose a threat to eg small children playing in puddles unless the water is filtered/purified to a high enough standard, in which case what are the savings over using the mains supply? Indeed consideration should be given to determining whether the additional pumping requirements for non-wholesome water would conflict with the ambition to reduce CO2 emissions. We understand that the main costs to WASCs are sewage treatment and pollution so it is arguable that rainwater harvesting is relatively pointless (as it can be more efficiently dealt with by a water treatment plant) while the use of grey water that would otherwise help to keep the sewers clean and free-flowing

would need to be adequately managed to avoid risk to human health. It is quite clear that the correct application of the CDM Regulations would require a supply of wholesome water in all circumstances.

All in all there appears to be little evidence to suggest that use of non-wholesome water supplies offers significant advantages in terms of water conservation or reduced CO2 emissions sufficient to outweigh the concerns about public health.

Q4. Requirement G1(2) specifies those locations where a supply of water is considered essential, but where wholesome water is not necessarily needed. Is it safe and reasonable to allow the use of water from non-wholesome sources to be used in (i) dwellings and (ii) in other buildings for WCs, urinals, external taps and laundry (subject to the exclusions in the guidance in this document)?

Yes: **No:** **No opinion:**

Comments: (e.g. are there any types of buildings where the use of non-wholesome water should not be allowed?)

See reply to Q3. The use of water from non wholesome sources is a hazard in dwellings or in any building where vulnerable occupiers might be at risk. External taps might also be perceived as potable water especially at low level where children can reach them. They could also be used to fill eg paddling pools. Is washing laundry in dirtier water not going to have an impact on the energy efficiency of the appliance? Storage and pumping systems for non-wholesome water supplies would be in addition to the systems installed for wholesome water. There is therefore an impact on energy demand for the building – how will this fit in with the proposed amendments to Part L? It seems probable that in terms of saving energy it would always be better to use a mains supply that has benefited from economies of scale in terms of energy requirements.

It is also unclear how alternative supplies are to reach the building. On many sites there would be no space for water storage tanks and the use of underground storage presents additional problems of protection from damage, potential groundwater pollution, issues of disposal of additional arisings etc. It is understood that in London there is only sufficient rainwater to flush the toilets of every third house, although it is not clear if this is an average over an average year or only in times of high rainfall. It is evident therefore that in areas of low rainfall there is little scope for rainwater harvesting to make a significant and reliable contribution to household requirements since there would not be sufficient supply. Likewise while hotels or similar establishments might produce considerable quantities of grey water this might not be enough to flush all the toilets. It seems that it is only feasible to consider the use of non-wholesome water on large, greenfield, well-managed sites in areas of high rainfall with plenty of space for storage. Even in such cases it would however seem to be safer, cheaper and more efficient to use water that has been centrally treated at a WASC plant.

Q5. It is expected that bringing together the various requirements to provide water to buildings will support better compliance. More consistent guidance would be beneficial to those seeking to comply and would assist consistent interpretation. Do you agree that it is helpful to include this guidance in the Approved Document? Are you satisfied with the guidance as drafted?

Yes: **No:** **Don't know:**

Comments: (e.g. what else should the guidance cover?)

If non-wholesome water is to be an option then there must be comprehensive guidance on where such supply may be used and how its continued use will be managed, monitored and guaranteed not to pose a risk to human health. There is no such guidance in this consultation.

Q6. Have we included sufficient detail in terms of the risk assessment and testing or specification of treatment systems that should be necessary to allow use of water from non-wholesome sources whilst protecting health within a building?

Yes: **No:** **Don't know:**

Comments: Absolutely not. You only refer vaguely to risk assessments. A rigorous testing and monitoring regime would need to be in place to guarantee that the supply was installed and continued to be maintained without risk to human health. It is not clear at this time that such a system is feasible, certainly for dwellings. There are also significant costs attached to the additional maintenance that would be required with the attendant risk that this would be skimmed on cost grounds.

Q7. Is this guidance on appropriate sources and uses of non-wholesome water in dwellings sufficient?

Yes: **No:** **Don't know:**

Comments: See replies to earlier questions. The risks of using non-wholesome water with inadequate safeguards are enormous and careful thought must be given to the exact circumstances in which it might be permissible to use such sources and to what extent their continued safe operation can be assured. Neither of these conditions has been met by the commentary in this consultation. Nor is there any indication that the whole life costing approach has been considered. There is no reference to the long-term impact of the non-wholesome water usage and its implications for particulate deposits in sewers etc. It is not just the supply of water that must be addressed but also its disposal – any grey water outfall would have to be connected to a public (foul) sewer. This is another argument for considering the amendment to Part G in association with Part H and the proposals to transfer private sewers and indeed the proposals in the anticipated Water and Flooding bill.

Water Efficiency

Q8. Is this guidance on appropriate sources and uses of non-wholesome water for buildings other than dwellings sufficient?

Yes: No:

Comments: See reply to Q7. Concerns about risk to human health must also be considered in buildings other than dwellings, particularly in schools and other institutions.

Q9. Do you agree this requirement effectively implements the Government's policy for improving water efficiency in new homes, as signalled in its July 2007 statement? If no, please explain why not.

Yes: No: No opinion:

Comments: It should be noted however that improving water efficiency is always going to be a behavioural issue and there are limits on how much you can influence behaviour through building regulations. The guidance of 125 litres per person per day might have been better set at 130 to give a wider margin for those reaching the Code for Sustainable Homes. It is also important to remember that vast areas of the country do not have a shortage of rainfall. There are in addition emerging concerns about customer satisfaction (or lack of) in terms of low water usage goods. As new homes constitute a small percentage of the total number of buildings, these practical considerations need to be taken fully into account in determining building regulations in this field.

Q10. A method of calculation for water use is provided in the Code for Sustainable Homes. We propose a simplified version of this calculation for use where dwellings will be supplied only with wholesome water. Do you agree that a simplified version of the calculation should be used in these situations?

Yes: No: No opinion:

Comments: The same system of calculation must be used for all regulations, the Code, guidance etc. Anything else would only lead to confusion and duplication of work.

Q11. We propose that the water use calculation method provided in the Code for Sustainable Homes should be used where the design includes alternative water sources to demonstrate a greater level of water efficiency. Do you agree that the full calculation be used in these situations?

Yes: No: No opinion:

Comments:

Q12. Some of our stakeholders have expressed concern that the low

flows in drains and sewers resulting from the proposed reductions in water use could lead to problems with blockages in drains and sewers. Do you agree that this may be an issue and if so do you have any substantial evidence of this?

Yes: **No:** **No opinion:**

Comments: Current drainage and sewer design is based on standards for gradients based on volume and distance. A reduction in flow rate would obviously have an impact on the efficiency of existing systems and would need to be allowed for in the design of any new sewers. CIWEM has data on self-cleansing velocities which needs to be assessed before such requirements can be implemented. The EA published some research only last year that assessed the impact of a reduction in flows on sewer performance. Given Defra's intention to ensure that all private sewers are adopted, is there not data available on the incidence of drain/sewer blockage and the causes thereof? It is possible that blockage risk could be overcome by the discharge of the stored non-wholesome water but this would need to be done on a regular basis which could divert it from other uses. Assuming that customers do in fact reduce their usage it is going to be very difficult to assess by how much and how consistently. It is particularly important given the findings of the Pitt Review where it was suggested that sewer flooding was a key issue. The likelihood that there would be a significant impact is yet another argument for reviewing Parts G and H together so that amending one does not lead to unforeseen consequences for the other.

Hot Water Services

Q13. Is it reasonable to expect a supply of heated wholesome water to be provided in all personal washing facilities and to sinks used in association with food preparation and washing up?

Yes: **No:** **No opinion:**

Comments:

Q14. Do you agree that it should now be a Requirement of the Building Regulations that all parts of hot water systems including cold water cisterns which could receive high temperature discharges from vented hot water storage systems should be able to withstand the effects of temperature and pressure that may occur either in normal use or in the event of such malfunctions as may reasonably be anticipated. ?.

Yes: **No:** **No opinion:**

Comments: We would have thought that this was of greater significance for the replacement/ refurbishment market.

Q15. Do you agree that this requirement should apply to (a) new

installations; (b) replacement of parts of installations including cisterns?

(a) new installations?

Yes: No: No opinion:

(b) replacements?

Yes: No: No opinion:

Comments: See reply to Q 13.

Q16. The amendment of G3(3) is proposed to address failures of the temperature control devices in vented hot water systems. Is it reasonable to bring control of vented systems into the Building Regulations?

Yes: No: Don't know:

Comments: Our perception is that recent incidents occurred because of inadequate maintenance of older systems rather intrinsic design faults. Where a registered installer is deemed competent there seems little point in including the control in the Building Regulations.

Q17. If you agree that vented systems should be brought into the building regulations, in which cases should this apply:

(a) new installations?

Yes: No: No opinion:

(b) when replacing a hot water boiler?

Yes: No: No opinion:

(c) when replacing a hot water storage vessel (cylinder)?

Yes: No: No opinion:

Comments: See reply to Q16.

Q18. Do you agree that primary thermal storage systems containing more than 15 litres of water should be treated the same as other hot water storage systems under the proposed requirement G3:

(a) where the thermal store is used to heat domestic hot water?

Yes: No: No opinion:

(b) where the thermal store is only used for space heating?

Yes: No: No opinion:

Comments: It would seem that the potential hazard is there whatever the use.

Q19. Do you agree with the view that the requirement in G3(4) (G3(b) in the existing Regulations) should be removed?

Yes: **No:** **No opinion:**

Comments: If there is a requirement for an accredited installer surely the terms of the accreditation would guarantee a certain standards?

Q20. Are you aware of other appropriate approaches to ensuring safety of all controlled hot water storage systems?

Yes: **No:** **Don't know:**

Comments:

Q21. Industry has advised that the proposed requirements and guidance for hot water systems outlined above are in line with current good practice in the industry. Their inclusion in the Approved Document will help raise awareness of such practice and ensure that clear guidance is available to all parts of the industry to support compliance. However they should result in no additional costs to industry. Do you agree with this assessment? Please provide details of which elements of the proposals you believe will add cost or benefits, and what you think the additional costs will be and who you think they will fall on.

Yes: **No:** **No opinion:**

Comments: It is difficult to assess at this stage but we can assume that anything already being done will cost what it costs. There is possibly an implication for costs for assessing compliance and maybe this would be an opportunity to assess the existing accreditation system. It is clear that any additional requirements will accrue additional costs and, as usual, the main impact would be on the affordability of housing.

Q22. Do you consider that there would be additional costs to Building Control Bodies as a result of the introduction of any of the above proposals, and, if so are you able to provide us with information on these?

Yes: **No:** **No opinion:**

Comments: If BCBs are to assess information that they did not see before this has an implication for workload and therefore cost. However, does information submitted by a certified person need to be checked?

Q23. We would like to introduce controls to limit water temperatures at hot water outlets; however the current cost benefit analysis does not support a regulatory change (costs are currently assessed at about three

times the benefits). Are you able to provide more information which we could use in further analysis of the costs and benefits? Please provide any additional information you can.

Yes: No: No opinion:

Comments: We agree that the costs are prohibitive.

Q24. If further evidence is forthcoming which reduces the gap between costs and benefits in the initial analysis, would you wish to see a provision which controlled the temperature at hot water outlets?

Yes: No: No opinion:

Comments: Given that there are over-ride devices it is not clear to what extent such controls would be effective in reducing the number of incidents. There would also be a detrimental effect on energy use as the water would still be heated to the same temperature but because the outlet temperature is lower more of the heated hot water would be used than if the hot and cold were mixed from separate sources. This is a serious consideration if we are to achieve the zero carbon target.

Q25. If you support the principle of introducing temperature control on hot water outlets in dwellings, subject to the preparation of a supporting Impact Assessment, which sanitary appliances would you like to see included?

(a) baths?

Yes: No: No opinion:

(b) showers?

Yes: No: No opinion:

(c) washbasins?

Yes: No: No opinion:

(d) bidets?

Yes: No: No opinion:

(e) kitchen sinks?

Yes: No: No opinion:

Comments: We did not support the principle for the reasons given but if such controls were to be introduced, baths are the only high risk of immersion for any period of time. Showers are unlikely to be as dangerous vis a vis scalding whereas there is a risk associated with pathogens in cooler water vapour and the shower head. However there would be problems installing such devices where there is a combination boiler as it is likely that the low

water pressure would make it impossible to run a bath hot enough.

Q26. If temperature controls were introduced, subject to the preparation of a supporting Impact Assessment, do you agree that all controlled outlets should be limited to 48°C? If No please state which outlets should be controlled to different temperatures and give details of the proposed temperature and why?

Yes: No: No opinion:

Comments: See reply to Q 25. Even at 48° quite serious injuries may be sustained and there is a danger that assumptions might be made about the safety of this temperature that would not be made if the user knew that the water were hotter.

Q27. If temperature controls were introduced, subject to the preparation of a supporting Impact Assessment, do you think that the same level of protection should be applied in buildings other than dwellings, and if so, which sanitary appliances would you like to see included?

(a) baths?

Yes: No: No opinion:

(b) showers?

Yes: No: No opinion:

(c) washbasins?

Yes: No: No opinion:

(d) bidets?

Yes: No: No opinion:

(e) kitchen sinks?

Yes: No: No opinion:

Comments: The same reasoning applies as to dwellings, with the addition that in eg supervised residential institutions the likelihood of scalding accidents should be reduced.

Q28. If temperature controls were introduced, subject to the preparation of a supporting Impact Assessment, to which types of work would you like to see regulations applied?

(a) the erection or extension of a dwelling or the creation of a dwelling by material change of use?

Yes: No: No opinion:
(b) the erection or extension of a building with rooms for residential purposes (e.g. residential homes, hostels, hotels) or the creation of rooms for residential purposes by material change of use?
Yes: No: No opinion:
(c) the erection or extension of any new building?
Yes: No: No opinion:
(d) the replacement of a sanitary appliance and/or associated taps which are controlled fittings in any building?
Yes: No: No opinion:
(e) the replacement of a sanitary appliance and/or associated taps which are controlled fittings in a dwelling?
Yes: No: No opinion:
(f) the replacement of a sanitary appliance and/or associated taps which are controlled fittings in a building with rooms for residential purposes?
Yes: No: No opinion:

Comments: If scalding is deemed to be a significant health and safety risk then there should be no area of exception and the installation of additional bathrooms should also be included.

Q29. For vented hot water storage systems, we have proposed that systems incorporating one safety device in addition to the vent pipe and any thermostat would meet the requirements of G3(3). Do you agree that this is adequate to ensure the safety of people in the building?

Yes: No: No opinion:

Comments:

Q30. For vented hot water storage systems, we have proposed that systems with a boiler overheat control would meet the requirement G3(3). Do you agree?

Yes: No: Don't know:

Comments:

Q31. Should the provision for third party approval in paragraphs 3.18 be retained? Please provide reasons

Yes: No: Don't know:

Comments:

Q32. Paragraphs 3.19 and 3.20 contain provisions on marking of

unvented hot water storage systems that were previously included in BS7206 but not in the replacement standard BS EN 12897. Do you agree that the Approved Document should include provisions for marking of unvented hot water storage systems with:

a) the information listed in 3.19? If no please state which items should not be included and give your reasons?

Yes: No: Don't know:

Comments: Why were they removed? If at the time there was seen to be no further need for these provisions why propose reinstating them?

b) the information listed in 3.20? If no please state which items should not be included and give your reasons?

Yes: No: Don't know:

Comments: See above.

Q33. Do you agree that unvented hot water storage systems over 45kW, but less than 500 litres in capacity are normally supplied by a manufacturer as packages or units?

Yes: No: Don't know:

Comments:

Q34. If so should the provision for third party approval in paragraphs 3.18 be extended to cover these systems? Please provide reasons for your answer.

Yes: No: Don't know:

Comments:

Q35. If the guidance permits the use of temperature resistant plastic pipes for the discharge pipe D2, will it be possible to adequately distinguish the pipe material from other plastic pipes in order to ensure that the correct grade of pipe is used? If Yes, please explain how this might be achieved.

Yes: No: Don't know:

Comments: There is already some colour coding of pipework but the cost of even more colours could be extremely expensive, and if large lengths of higher grade plastic are required this also has cost implications. But it is not clear otherwise how different grades of plastic could be adequately identified.

Assuming that there would also need to be a means of identifying any non-wholesome water supply there is a risk that the proliferation of different coloured pipework could cause confusion resulting in additional risks to health and safety.

Q36. It is proposed to permit the termination of a discharge pipe in a soil stack provided the soil stack is made from a suitably temperature resistant material. Do you believe it will be possible to ensure that a soil stack is made from a temperature resistant material particularly where the soil stack is in a service duct? If Yes, please explain how this might be achieved.

Yes: No: No opinion:

Comments: See replies to Q35.

WCs and Associated Facilities

Q37. Requirement G4 (4) would apply to other buildings such as institutions, hotels etc which may be workplaces and covered by current requirements. Do you agree that the Building Regulations the right place for this Requirement and that this change would not impose additional costs or other burdens?

Yes: No: No opinion:

Comments: It is the right place but there will be additional costs.

Q38. Are the changes to the wording of the guidance and the inclusion of diagrams 2 and 3 helpful in clarifying how WCs and associated hand washing facilities are provided in relation to kitchens in dwellings? If no, what alternative changes would you like to see?

Yes: No: No opinion:

Comments:

Q39. References to other sources of guidance and standards on the scale of provision of WCs, urinals and hand washing facilities in buildings other than dwellings has been added to aid in the design of buildings. Do you agree it is appropriate and helpful to include this in Approved Document G?

Yes: No: No opinion:

Comments:

Q40. Is it appropriate to include guidance on the performance of chemical and composting toilets in the Approved Document G?

Yes: No: No opinion:

Comments: They would however sit best in Part H as it stands.

Bathrooms

Q41. The application of this Requirement is currently limited to dwellings. Do you consider that there is a need for a new requirement for the provision of adequate bathing facilities in buildings containing rooms for residential purposes e.g. hostels, hotels etc..?

Yes: No: No opinion:

Comments:

Food Preparation Areas

Q42. The introduction of a new Requirement has been proposed to align Part G with current practice. Stakeholders advise us that this will impose no new burdens. Do you agree that it would be beneficial to include this new requirement, and that it will introduce no additional cost or other burdens?

Yes: No: No opinion:

Comments: It would add to costs.

Sanitary Appliances

Q43. The Requirement to install appliances to allow adequate cleaning is currently limited to WCs, urinals and washbasins. Is it reasonable to extend this to include other appliances (and which ones)?

Yes: No: No opinion:

Comments: Surely manufacturers already consider such issues when designing products? Any additional regulation would add to costs.

Q44. The Requirement to design appliances through the correct choice of profile and materials to allow adequate cleaning is currently limited to WCs, urinals and washbasins. Some stakeholders have suggested this should be extended to include baths, shower trays, sinks, bidets, taps and shower hoses/heads. Do you agree this is necessary?

Yes: No: Don't know:

Comments: Appliances that are difficult to clean are unlikely to get beyond the first product testing.

Q45. Some stakeholders have suggested that there is no need for a Requirement on cleanability of baths, shower trays and cubicles, sinks, bidets, taps and shower hoses/heads. Do you agree?

Yes: No: Don't know:

Comments:

Q46. If the Requirement (on cleanability), and the guidance, was either removed or was extended to include other sanitary appliances, would this have implications for products currently on the market? Please specify.

Yes: No: Don't know:

Comments: Existing products would have to demonstrate that they met some 'cleanability' standards.

Q47. It has been suggested that we might consider new guidance for slip-resistance on shower and bath surfaces. This has not yet been included and your views are sought. Do you think guidance on this in Approved Document G would be appropriate?

Yes: No: Don't know:

Comments: There are already health and safety guidelines. And would you formally determine a standard for slip resistance?

Q48. If there is a place for this guidance, which surfaces and products might it cover?

(a) shower trays

Yes: No: No opinion:

(b) baths

Yes: No: No opinion:

(c) wet rooms

Yes: No: No opinion:

(d) other products/surfaces

Yes: No: Don't know:

Comments: No. It is unnecessary.

Impact Assessment

Q49. There are a number of proposed changes to Approved Document G. Those listed under Option 2 of the Impact Assessment are considered not to be a change in current practice and reflect guidance in standards and the Water Regulations Guide. Do you agree with stakeholder views that these changes would not lead to additional costs, and are you able to provide additional information on this?

Yes: No: Don't know:

Comments:

Q50. The benefits and costs of introducing temperature control to sanitary appliances have been presented in this Impact Assessment. Do you think these benefits and costs are reasonably represented? If you are able to provide additional information for use in the modelling, please note this in the comments.

Yes: No: No opinion:

Comments: The figures appear reasonable. The second part of the question implies that the research is insufficient to reach a conclusion.

Q51. Introducing in-line blending valves to new build properties, extensions and changes of use impose significant costs which greatly exceed the financial benefits of this measure. Whilst we would like to support the introduction of these to control the temperature on bath taps in order to start addressing the most severe and fatal injuries from hot tap water associated with baths, we cannot justify a proposal to do this. Are you able to provide us with additional information to inform our assessment of the costs and benefits of these?

Yes: No:

Comments:

Other Comments: (e.g. Do you find the guidance helpful?)

Generally we would comment that, particularly in the light of the recent consultation on the Future of Building Control with its proposals to simplify the regulations and to review them in a more structured way, there seems little point in amending Part G without considering Part H or the proposed transfer of private sewers or the imminent Water and Flooding Bill consultation. The original impetus for reviewing Part G was to address concerns about scalding accidents but as most of the proposals in this consultation actually relate to supply and drainage it would be better to defer any amendments until decisions have been taken on simplifying and/or merging the Parts of the

Building Regulations.

While we would support the Government's desire to reduce the consumption of wholesome water we would point out that according to water industry figures, a reduction of 1% in the water leakage rate would provide sufficient wholesome water to supply 160,000 new houses (at an estimated 150 litres per person per day). It would seem therefore that a simple requirement on the water industry to improve its performance would be more effective than yet more requirements for new homes which make up a mere 1% of the homes in this country.

We are concerned about the vagueness of the references to risk assessment as we feel that there is insufficient consideration of the hazards of non wholesome water and not enough thought has been given to how to guarantee public safety.

There are legal liability issues of supplying non wholesome water that we would be concerned about how to convey to our customers.