

Annex A

Response Form

Section three: Part P (Electrical safety – dwellings)

We are seeking your views on the following questions on the Government's proposed changes to Part P of the Building Regulations.

If possible, please respond by email to:

building.regulations@communities.gsi.gov.uk

Alternatively, responses may be sent by post to:

Building Regulations Consultation
Building Regulations and Standards Division
Department for Communities and Local Government
Zone 5/G9
Eland House
Bressenden Place
London SW1E 5DU

About you:

(i) Your details

Name:	D.F.Mitchell
Position:	Technical Director
Name of organisation (if applicable):	Home Builders Federation
Address:	7-9 St James Street, London, SW1A 1EE
Email:	dave.mitchell@hbf.co.uk
Telephone number:	020 7960 1600

(ii) Are the views expressed on this consultation an official response from the organisation you represent or your own personal views?

Organisational response ☒ Personal views ☐

(iii) Are your views expressed on this consultation in connection with your membership or support of any group? If yes please state name of group:

Yes ☐ No ☒

Name of group:

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(iv) Please tick the *one* box which best describes you or your organisation:

Builders/Developers:	Property Management:
<div>Builder – Main contractor <input type="checkbox"/></div> <div>Builder – Small builder <input type="checkbox"/></div> <div>(extensions/repairs/maintenance, etc)</div> <div>Installer/specialist sub-contractor <input type="checkbox"/></div> <div>Commercial developer <input type="checkbox"/></div> <div>House builder <input type="checkbox"/></div>	<div>Housing association <input type="checkbox"/></div> <div>(registered social landlord)</div> <div>Residential landlord, private sector <input type="checkbox"/></div> <div>Commercial <input type="checkbox"/></div> <div>Public sector <input type="checkbox"/></div>
Building Occupier:	Building Control Bodies:
<div>Homeowner <input type="checkbox"/></div> <div>Tenant (residential) <input type="checkbox"/></div> <div>Commercial building <input type="checkbox"/></div>	<div>Local authority building control <input type="checkbox"/></div> <div>Approved Inspector <input type="checkbox"/></div>
Designers/Engineers/Surveyors:	Specific Interest:
<div>Architect <input type="checkbox"/></div> <div>Civil/Structural engineer <input type="checkbox"/></div> <div>Building services engineer <input type="checkbox"/></div> <div>Surveyor <input type="checkbox"/></div>	<div>Competent person scheme operator <input type="checkbox"/></div> <div>National representative or trade body <input checked="" type="checkbox"/></div> <div>Professional body or institution <input type="checkbox"/></div> <div>Research/academic organisation <input type="checkbox"/></div>
Manufacturer/Supply Chain	Energy Sector <input type="checkbox"/>
<div>Manufacturer/Supply Chain <input type="checkbox"/></div>	<div>Fire and Rescue Authority <input type="checkbox"/></div> <div>Other (please specify) <input type="checkbox"/></div>

(v) Please tick the *one* box which best describes the size of your or your organisation's business?

Micro – typically 0 to 9 full-time or equivalent employees (incl. sole traders) ☐

Small – typically 10 to 49 full-time or equivalent employees ☒

Medium – typically 50 to 249 full-time or equivalent employees ☐

Large – typically 250+ full-time or equivalent employees ☐

None of the above (please specify) ☐

(v) Are you or your organisation a member of a competent person scheme?

Yes ☐ No ☒

Name of scheme:

(v) Would you be happy for us to contact you again in relation to this consultation?

Yes ☒ No ☐

DCLG will process any personal information that you provide us with in accordance with the data protection principles in the Data Protection Act 1998. In particular, we shall protect all responses containing personal information by means of all appropriate technical security measures and ensure that they are only accessible to those with an operational need to see them. You should, however, be aware that, as a public body, the Department is subject to the requirements of the Freedom of Information Act 2000, and may receive requests for all responses to this consultation. If such requests are received we shall take all steps to anonymise responses that we disclose, by stripping them of the specifically personal data – name and email address – you supply in responding to this consultation. If, however, you consider that any of the responses that you provide to this survey would be likely to identify you irrespective of the removal of your overt personal data, then we should be grateful if you would indicate that, and the likely reasons, in your response, for example in the comments box.

Questions:

1. Impact of Part P

Do you believe that the three aims behind introducing Part P in 2005 have been achieved? Please comment on the extent to which they have been achieved and what evidence you have to support your view. (See paragraph 24 of Chapter 2.)

(a) Quality of electrical installation work improved

Yes ☒ No ☐ Don't know ☐

Comments:

(b) Competence of installers improved

Yes ☐ No ☒ Don't know ☐

Comments:

In the case of new build we have always used competent installers

(c) Electric shock and electrical fire accidents reduced

Yes ☒ No ☐ Don't know ☐

Comments:

2. Options for amending Part P in 2013

Which option for amending Part P in 2013 do you support? (See paragraph 25 of Chapter 2.)

Leave Part P unchanged

☐

Revoke Part P

☐

Amend Part P to reduce costs and burdens

☒

Please give your reasons:

3. Extending the range of non-notifiable work

(i) Do you agree that we should increase the amount of minor electrical installation work that is non-notifiable?

Yes ☒ No ☐ Don't know ☐

Please give your reasons:

(ii) Which if any of the types of electrical work identified in paragraph 33 of Chapter 2 would you support becoming non-notifiable?

(a) Alteration work in kitchens

Yes ☒ No ☐ Don't know ☐

Comments:

(b) Alteration work outdoors

Yes ☒ No ☐ Don't know ☐

Comments:

(c) Alteration work in bathrooms outside the zones

Yes ☒ No ☐ Don't know ☐

Comments:

(d) Alterations to floor and ceiling heating systems

Yes ☐ No ☒ Don't know ☐

Comments:

(e) All work on control circuits

Yes ☒ No ☐ Don't know ☐

Comments:

(iii) Are there any other currently notifiable jobs that you believe should become non-notifiable?

Yes ☐ No ☒ Don't know ☐

Please provide details:

(iv) Are there any currently non-notifiable jobs that you believe should become notifiable?

Yes ☐ No ☒ Don't know ☐

Please provide details:

(v) Should we make the existence of 30mA RCD protection on affected circuits a condition for alteration work being non-notifiable?

Yes ☒ No ☐ Don't know ☐

Please give your reasons:

(vi) Do you agree with the proposed changes to the guidance on pages 8 and 9 of Approved Document P, as outlined in paragraph 35 of Chapter 2? If you do not, please explain why.

Yes ☒ No ☐ Don't know ☐

Comments:

4. Third party inspection and testing

- (i) Do you agree that we should allow third party qualified persons to inspect and test electrical installation work carried out by unregistered installers who are not competent to do their own inspection and testing?

Yes ☒ No ☐ Don't know ☐

Please give your reasons:

- (ii) Do you support the options in paragraph 41 of Chapter 2 for third party inspection and testing of work done by others?

(a) Qualified person issues Condition Report and building control body issues Building Regulations Completion Certificate

Yes ☐ No ☐ Don't know ☒

(b) Registered person issues Condition Report and, via registration body, Building Regulations Compliance Certificate

Yes ☐ No ☐ Don't know ☒

Please give your reasons:

- (iii) Should third parties carrying out inspection and testing of another person's work be required to hold a specific inspection and testing qualification?

Yes ☒ No ☐ Don't know ☐

Please give your reasons and comment on any other qualifications you believe they should hold:

- (iv) Do you believe that third party inspection and testing should include an inspection at first-fix stage?

Yes ☐ No ☒ Don't know ☐

Please give your reasons:

5. Part P Impact Assessment

Please refer to the Part P Impact Assessment at:

www.communities.gov.uk/publications/planningandbuilding/brconsultationsection3

- (i) Do you agree with the three cost-benefit assumptions set out in paragraph 46 of Chapter 2?

(a) Increase in accident rates if Part P revoked

Yes ☐ No ☐ Don't know ☒

Comments:

(b) Reduction in registrations if Part P revoked

Yes ☐ No ☐ Don't know ☒

Comments:

(c) Cost of third party inspection and testing

Yes ☐ No ☐ Don't know ☒

Comments:

(ii) Do you disagree with any of the other cost-benefit assumptions and calculations in the Impact Assessment? If so, please provide details:

(iii) Can you provide any further robust evidence or data (whether directly or indirectly relevant) to help improve the accuracy of the calculations in the Impact Assessment? (See paragraph 73 of the Part P Impact Assessment.) If so, please provide details:

no

6. BS 7671:2008

(i) Do you support the proposal to refer for technical guidance in Approved Document P to “BS 7671:2008 incorporating Amendment No 1: 2011” and to update all the references to IET guides and guidance notes?

Yes ☒ No ☐ Don't know ☐

Comments:

(ii) Do you agree that referring to BS 7671:2008 will not increase costs for installers?

Yes ☐ No ☐ Don't know ☒

If you do not agree, please give your reasons:

7. Limits on application

Do you agree that it is necessary to clarify the scope of Part P, as in paragraphs 53 to 54 of Chapter 2?

Yes ☒ No ☐ Don't know ☐

Comments:

8. Accessibility

Do you agree that we should revise the guidance in Approved Document P on the accessibility of consumer units, as in paragraph 57 of Chapter 2?

Yes ☒ No ☐ Don't know ☐

Comments:

9. Approved Document P Appendices

Do you agree with the outline proposals for changing the Appendices of Approved Document P? (See paragraph 58 of Chapter 2.)

Yes ☒ No ☐ Don't know ☐

Comments:

Other comments

If you have any other comments or suggestions on possible changes to Part P of the Building Regulations, please make them here: