

Minister Alan Dillon,
Department of Housing, Local Government & Heritage,
Custom House,
Dublin,
D01 W6X0

30th January 2025

Dear Minister Dillon,

**RE: Consultation - Review of Building Regulations Technical Guidance Document L
(Conservation of Fuel and Energy) Dwellings and Technical Guidance Document F
(Ventilation)**

The Construction Industry Federation (CIF) encloses a submission in response to the consultation referenced above. The IHBA welcome the opportunity to share valuable industry feedback on this matter.

Our submission is enclosed in the prescribed format, but to summarise, our key points are as follows:

- Proposed transitional arrangements are too short (a longer lead in time is recommended).
- Concern regarding further record keeping requirements for builders.
- Concern about subsequent cost increases resultant from the changes.
- Definition of “major renovation” and associated cost optimal works, which need to be reconsidered.

In addition to the above points, industry have raised concerns about the impact of these changes on the cost of renovation works at a point when the price of materials and supplies are already high, with regulatory costs only adding to this. These changes will inevitably impact homeowners considering their own renovation works, a project that is already costly and challenging to undertake. Imposing these requirements as they are will likely result in less buildings being refurbished due to the increased costs. Industry is supportive of changes that will help Ireland meet its green targets (with these changes resultant from the Energy Performance of Buildings Directive (EPBD)). However, it is important that this review does not prevent homes from being refurbished and improved, because of the onerous costs associated with the changes.

We look forward to receiving a response to our submission from you.

Yours sincerely,



Conor O'Connell
Director – Housing, Planning & Development Services



Template for comments / observations returned during the		Date:	Document: Review of Technical Guidance Document L Dwellings	
Name of Organisation / Respondent	Heading / Section No. / Appendix No. / Table No. or Diagram No. (e.g. Interpretation / Section 2.1.2.6 / Appendix B.5.1.1)	Type of comment G = General E = Editorial T = Technical	Comment / Observation	Proposed change (if any)
Construction Industry Federation (CIF)	Introduction, pg. 1	G	Removal of minimum 10 car parking spaces from the phrase: "setting minimum electric vehicle recharging infrastructure provisions for new buildings and for buildings undergoing major renovation where there are more than 10 car parking spaces".	This will add undue cost and viability challenges to projects, which is a problem for small scale projects where viability is often tight. We therefore propose that the wording remains as is to avoid projects being prevented due to the additional cost of these EV works.
	Introduction, pg. 1	E	Typo where "self-regulating" is written.	
	Transitional Arrangements, pg. 2	G	The proposed transitional arrangements are too short notice, particularly those relating to the commencement of works taking place on or before 31/03/25.	Have a longer lead in time to allow for transitional arrangements to take place.
	1.4.6.2(a)	G	Concern over the recommendation that 100% ducting should be provided.	Our members have experienced difficulty obtaining drawings from electricity suppliers confirming 100% (where suppliers are unable to confirm future capacity for a scheme). Evolving technology also means that this could become redundant before it's even used, which would be costly along with being unsustainable. We recommend this is reviewed.
	1.6 User Information 1.6.1(d), pg. 37	E	Remove repetition of "information".	
		G/T	Definition of "major renovation" needs to be provided.	
	Table 5, pg. 41 - 42		Including two cavity wall sizes is overly prescriptive.	Further clarification is needed here, with a range of cavity widths being included.
	2.3.9 Limiting Heat Gains, pg 48		This will likely impact costs, project timescales and resources.	This will add more costs to projects - review.
	2.3.9(d) Limiting Heat Gains, pg 49	T	Define "reasonable level of ventilation"	Industry standard definition must be used.
	2.3.10, Table 6, pg. 51	G	"Internal lining with or without internal insulation is considered major renovation work". Some concern about this being considered "major".	Reconsider inclusion.
	Table 7 "Cost Optimal Works activated by Major Renovation", item 6, pg. 52	G	The stipulation that replacement of oil/gas boilers and replacement of electric storage systems should be with "a connection to an efficient district heating where available or a heat pump system" is too prescriptive.	Original wording should remain ("renewable energy source").

	Table 7 "Cost Optimal Works activated by Major Renovation", item 6, pg. 52	E	If proposed wording remains, the word "system" needs to be added following the phrase "an efficient district heating...".	



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Construction Industry Federation (CIF)	"Transitional Arrangements", pg. 5	G	The proposed transitional arrangements are too short notice, particularly those relating to the commencement of works taking place on or before 31/03/25.	Have a longer lead in time to allow for transitional arrangements to take place.
	1.2.1.10, pg. 16	T	Independent competent person needs to be suitably defined.	
	1.2.1.10	G	Comment on ventilation validation forms being retained by the developer.	Change to "Ventilation Validation reports should be retained by the developer of the dwelling <i>to the best of their ability</i> ..."
	1.2.1.11	G	As above.	Should be changes to the suggested wording as above.
	1.2.1.13	G	As above.	Should be changes to the suggested wording as above.
	1.2.4.16	G	As above.	Should be changes to the suggested wording as above.
	1.2.4.18	G	Concern that this change will add unnecessary costs to projects.	Inclusion should be reconsidered, given that it could impact project costs.
		G	Concern that these changes will add more challenges to housing delivery (even from just a re-use/conversion perspective).	Undertake regulatory cost assessment of all proposed changes and consider the impact these will have on housing delivery.