



National Federation of Glaziers

Excellence and Integrity in Glazing

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15th June 2022 may be a moment of some significance for the glazing industry.

It is 20 years since Building Regulations were applied to window and door installations. In that time great strides have been made in enhancing the heat-retentive qualities of products installed. The industry has invested heavily in better insulated frames and glazing driven by the requirements of Part L (Conservation of Heat and Power) which has been periodically revised over that period. 15th June 2022 marks the latest revision.

Part F (ventilation) has specified different ventilation requirements for new build properties for many years, but now this has been extended to where windows and doors are being replaced. There was a proposal in 2006 to include replacement windows and this was dropped when the issue of additional costs to the consumer were raised by the Government department at that time.

The current DLUHC (Department for Levelling Up, Housing & Communities) Existing Home Ventilation Guide states: "Building regulations require that the ventilation in your home is not be made worse by installing energy efficiency measures.....Always leave vents open and unblocked even in winter. You will use a little more energy to heat your home, but have fresh air to prevent illnesses".

Trickle vents need holes drilled either through the window/door frame, an opening sash or through a frame extension. On a welded uPVC frame even with the vent closed this allows outside air to circulate around the frame or sash, making either, in cold weather, cold which must compromise the 'u' value or Energy Rating. It may also cause condensation on the frame or sash.

The alternative, using a frame extension onto the head of the window may not always be possible due to plaster lines and in any event make the head of the window larger and create a cold bridge. It may also create condensation.

It is stated in the Part F document that "energy efficiency should be considered when specifying ventilation systems". There is no question that in applying the revised requirements energy efficiency will be compromised.

The result is that the honest installer is placed in an invidious position.

If energy efficient windows are being marketed with holes through the window frame to accommodate trickle vents, then the standard set out in Part L cannot be met. No window is tested with trickle vents; if they were it is obvious they would not comply with Part L.

Unless the installer makes this clear to a prospective customer at point of sale, he/she is open to accusation of mis-selling and/or misrepresentaion.

The only ethical course of action available to protect the reputation of the business is explain the situation as it really is; namely that if a trickle vent is fitted to any window or door its energy efficiency will be compromised. As an installer there is a responsibility to ensure that the Building Regulations are met

and that any claims made against you, regarding the lessened heat-saving properties of the new windows, will not be accepted.

It is hoped that potential consumers will appreciate your honesty, and may happily accept the situation. But what if they are not?

There are exclusions in the Part F document and you need to study the document and be familiar with them. There are sections which are open to interpretation. Who interprets? It may need a few references to the Courts, sadly. One obvious one is the noise element. The regulation uses the phrase "a busy urban road". What does that mean? Excessive noise can also occur in many other situations (and is subjective, of course) and the customer may pay for acoustic sealed units. Despite the availability of acoustic vents they cannot be as efficient as acoustic sealed units. These will have a significant effect. If a consumer has invested in these units it is unlikely they will happily accept vents.

The amount of ventilation through a particular vent will vary depending upon the size of the holes drilled through the frame. Who will inspect this?

Our concern is that even after a period of consultation an impossible to enforce amendment to Part F has been unfairly imposed onto window installers and companies. As already mentioned, how much time, effort and resource has been expended over the last 20 years by the glazing industry to provide greater energy efficient windows? Now, the amended Part F will work directly against this.

There is a sensible place for trickle vents in windows, but it is moving toward a tyranny when householders have to have trickle vents installed when they already have adequate window openings (as the current Building Regulations require). If they are not minded to use the vents, they won't. Education regarding healthy homes must be a good move, but dictat is surely not the best way to achieve that.

To summarise, consumers are now being forced under the revised Part F to accept less energy efficient windows, and pay more for them in the additional costs of trickle vents and in heating costs to boot! Installers are being unfairly compelled to force Part F amendments on the consumer which contradict the requirements of Part L. In the market place, those most honest and ethical, exercising a Duty of Care to their customers, will be faced with turning away orders to the less scrupulous.

This is an unsatisfactory state of affairs.

So far, disappointingly, those closest to the Department of Levelling Up, Housing and Communities have not managed to bring some common sense into this situation.

We shall continue to bring to the notice of all stakeholders the situation that we now find ourselves. We shall also do everything we can to obtain a delay in implementation of the Part F revision until a sensible debate can take place.

To assist us, we will be delighted to receive from anyone involved your personal experience in dealing with this situation.

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