



Menai Avenue
Croeserw
Port Talbot
SA13 3SF

Sites 2 & 3 Energy Strategy Statement

Project Ref: 2754

16 February 2026

Revision: A

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architecture
urban design
sustainability
civil engineering
structural engineering

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Section 1: Introduction

1.1 Introduction

This **Energy Strategy Statement** has been prepared by Spring Design to support Tai Tarian's proposed delivery of 25 dwelling units for social housing at the following development site:

Plots 2 & 3 Menai Avenue & Pen-y-Bryn
Croeserw
Port Talbot
SA13 3SF

This document establishes the legislative context as it pertains to energy, discusses the refurbishment potential and viability of the existing buildings and assesses the success of proposals through the lenses of [3.1 Site Layout & Orientation](#); [3.2 Heat Loss Form Factor](#); [3.3 Glazing Quantity, Distribution & Shading](#), [3.4 Building Fabric](#), [3.5 Mechanical Services](#) and [3.6 Overheating](#).

Section 2: Context

2.1 Planning Policy Wales - Edition 12

Welsh Government have enshrined the route to decarbonisation of housing within planning policy, dedicating sections of [Planning Policy Wales - Edition 12 \(2024\)](#) to the discussion of strategic approaches for sustainable development in Wales.

Key policies established include the Energy Hierarchy for Planning (Figure 1) which clearly prioritises the reduction in energy demand above energy efficiency and renewable energy generation. This is considered critical in supporting a divestment of fossil fuels and uptake of electric power, particularly with the growing use of electric vehicles and heat pumps.

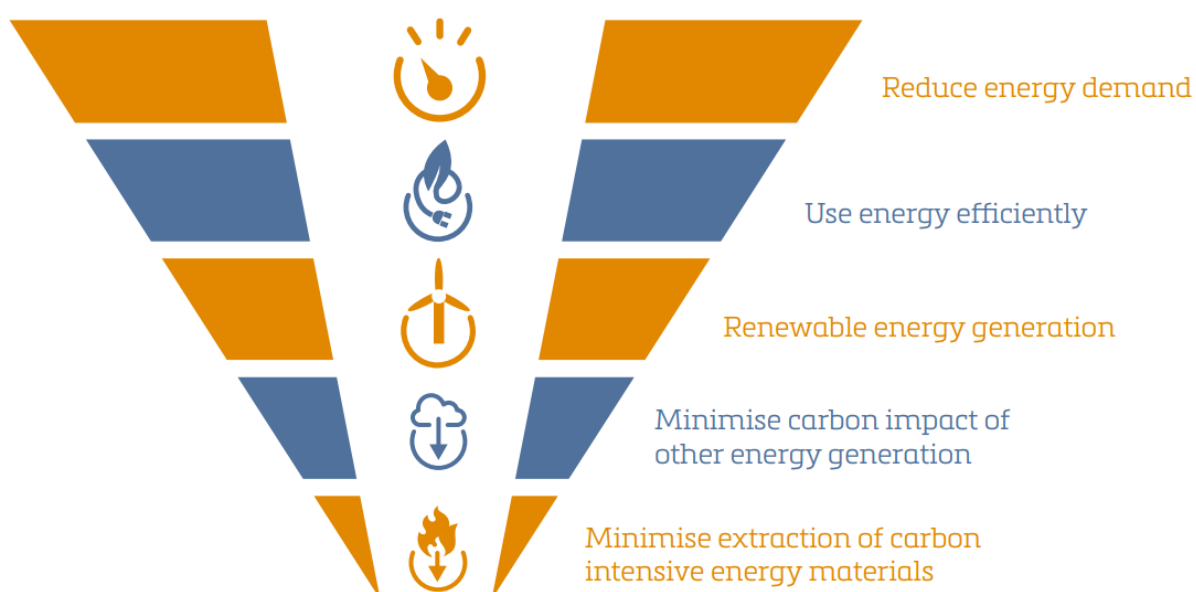


Figure 1: Planning Policy Wales - Edition 12 (2024) - Energy Hierarchy for Planning

In response to this requirement for a reduction in energy demand the planning system is required to support development that can demonstrate low embodied carbon and low operational energy demand. It follows that proposals should evidence procedures for the minimisation of whole life emissions associated with their location, design, construction, use and eventual demolition. Strategies to deliver decarbonisation, mitigation for climate change and built-in climate resilience should also be considered positively.

Proposals developed for planning must consider the implications of revisions and changes to Building Regulations requiring enhanced standards of carbon reduction in new buildings.

Excerpts from the relevant sections of the policy document are supplied for reference within [5.1 Planning Policy Wales – Edition 12](#).

2.2 Welsh Development Quality Requirements 2021

Building upon [Planning Policy Wales - Edition 12 \(2024\)](#) the [Welsh Development Quality Requirements 2021](#) (WDQR 2021) sets clear aspirations for the decarbonisation of new build social housing.

WDQR 2021 requires consideration of whole-life carbon and strategies for a reduction of both embodied and operational carbon. This is supported by recommending assessment of the reuse potential of existing buildings, specification of reused and recycled materials and ensuring buildings are designed so at the end of their operational life they can be adapted, reused or - embracing circular economy principles - deconstructed with recovered materials re-used or recycled. The reduction of operational energy demand is again prioritised: on-site renewables are recommended as a complementary strategy where they would be appropriate for the development.

A minimum EPC A (SAP 92+) must be achieved for dwellings without the use of fossil fuel appliances to deliver heating and hot water. In attaining EPC A, dwelling fabric standards must align with those defined within Table E1 Elemental Specification of [Approved Document L Volume 1: Dwellings \(2022\)](#) (Figure 2). Alternative proposals are considered acceptable where they can demonstrate energy demand has been reduced: this was clarified in the [WDQR 2021 Frequently Asked Questions \(FAQ\) Addendum \(2023\)](#) as achieving a space heating demand equal to or less than 40 kWh/m²/yr as calculated using the Passive House Planning Package (PHPP) by a competent professional.

Assessment of climate resilience, in the form of protection against overheating, is also mandated for all apartments and those dwelling houses without windows in two parallel aspects. Dwellings falling into this definition must undertake dynamic thermal modelling through CIBSE TM59 assessment as a 'Category 1 building.' Where a dwelling house is provided operable windows in two parallel aspects, it is assumed to have adequate provision of cross-ventilation to mitigate the potential for overheating.

Excerpts from the relevant sections of the policy document are supplied for reference within [5.2 Welsh Development Quality Requirements 2021](#).

2.3 Approved Documents F, L & O

The Approved Documents provide guidance on how to comply with each aspect of the Building Regulations, periodically revised to respond to perceived issues and to reflect the evolving knowledgebase. Both [Approved Document F \(Wales\) Volume 1: Dwellings \(2022\)](#) and [Approved Document L \(Wales\) Volume 1: Dwellings \(2022\)](#) have been revised to reflect improved energy efficiency targets, augmented by [Approved Document O \(Wales\): Overheating \(2022\)](#) to build in climate resilience.

[Approved Document F \(Wales\) Volume 1: Dwellings \(2022\)](#) has been refined to simplify guidance in relation to ventilation provisions. The document exists to ensure dwellings are provided an adequate supply of fresh air, sufficient extraction from rooms where water vapour or pollutants are likely to be generated and purge ventilation to remove high

concentrations of pollutants and water vapour. This provision can be achieved through natural ventilation, mechanical ventilation or a combination of the two systems.

An as-built air permeability below $3\text{m}^3/(\text{h}\cdot\text{m}^2)$ at 50Pa disqualifies a dwelling from using natural ventilation.

The requirements and rates are not significantly different from those established within the superseded 2010 document but does clarify purge ventilation is likely to be exceeded by the requirements of AD O (2022): the greater figure should always be the design target.

[Approved Document L \(Wales\) Volume 1: Dwellings \(2022\)](#) aims to deliver c. 30% reduction in CO₂ emissions versus the 2014 regulations by motivating more energy efficient dwellings. An additional metric for assessment is introduced, the target primary energy rate (TPER), which combines: energy demand of the dwelling; efficiency of the heat delivery system; carbon intensity of the generation and distribution of the chosen fuel source.

Table E1 Elemental Specification

Element or system	Specification
Opening areas (windows and doors)	Same as actual dwelling up to a maximum proportion of 25% of total floor area ¹
External Wall U-value (W/m ² K)	0.13
Corridor Wall U-value (W/m ² K)	0.18
Party Wall U-value (W/m ² K)	0
Roof U-value (W/m ² K)	0.11
Floor U-value (W/m ² K)	0.11
Windows, Roof Windows and Glazed Door U-value (W/m ² K)	1.3 (whole window u-value)
Rooflight U-value (W/m ² K)	1.6 (whole window u-value)
Windows, Roof Windows, Glazed Rooflights and Glazed Door g-value	0.63 ³
Opaque and Semi-glazed Door U-value (W/m ² K)	1.0

Figure 2: Excerpt from AD L (Wales) (2022) - Table E1 Elemental Specification

The document mandates all new build dwellings must achieve a minimum EPC B (SAP 81+) and demonstrate a dwelling emission rate (DER) at or below the target emission rate (TER) plus dwelling primary energy rate (DPER) at or below the target primary energy rate (TPER). Revised fabric u-values are defined within Table 10 Elemental Specification (Figure 2) and present an improvement on the superseded document.

Thermal bridges are dealt with more punitively than previously with the default values for SAP significantly increased. This should incentivise more attention to the detailing of junctions to mitigate the effect of thermal bridging with bespoke psi value calculations.

[Approved Document O \(Wales\): Overheating \(2022\)](#) has been introduced as a means of climate resilience, building in strategies to deal with anthropogenic climate change elevating the incidence rate of heatwaves. While relatively basic in this first edition, it starts to develop criteria to mitigate the overheating potential of dwellings.

Where a dwelling house demonstrates compliance with AD F (Wales) (2022) and has operable windows in two parallel aspects it is assumed to have adequate cross-ventilation. All apartments and those dwelling houses without operable windows in two parallel aspects must either demonstrate compliance with the simplified method (Figure 3) or undertake dynamic thermal modelling through CIBSE TM59 assessment as a 'Category 1 building.'

Mitigation approach	Minimising summer solar gains	Heat removal (Openable windows ¹ and ventilation louvers)
Single aspect residential buildings		
Approach S1	Maximum glazed area of 15% of floor area	Minimum free area of 12% of floor area
Approach S2	Maximum glazed area of 20% of floor area Glazing with a maximum g-value of 0.4.	Minimum free area of 10% of floor area
Dual aspect residential buildings		
Approach D1	Maximum glazed area of 15% of floor area	Minimum free area of 12% of floor area
Approach D2	Maximum glazed area of 35% of floor area Glazing with a maximum g-value of 0.4.	Minimum free area of 12% of floor area
Approach D3	Maximum glazed area of 35% of floor area External shutters with means of ventilation on all facades. Overhangs with 50° altitude cut-off can be used instead of external shutters on south façades*. * i.e. walls with a south east to south west facing orientation	Minimum free area of 12% of floor area
Note: ¹ When calculating the free area for heat removal on hinged or pivot windows, for calculation purposes, the maximum opening angle that is practical and safe to achieve can be used, however, with a limit of 60°.		

Figure 3: Excerpt demonstrating the simplified method from AD O (Wales): Overheating (2022) - Controlling overheating by minimising summer solar gains and heat removal

2.4 Tai Tarian Design Principles & Specification

The [Tai Tarian Design Principles & Specification](#) (September 2022) document outlines the aspirations of the housing association to become carbon neutral by 2030.

Since a large amount of Tai Tarian's carbon emissions come from their housing stock, they are focused on making new houses as eco-friendly as possible from how they are built to how they are lived in and maintained.

To meet this goal, all new homes must follow the latest building standards (WDQR 2021 and Building Regulations). Tai Tarian will also take a “fabric first” approach, which means making the building itself as energy efficient as possible before adding extra technology. This includes measuring how much carbon is used in construction and how much energy the home will use once people move in. The aim is to keep energy bills low for residents.

2.5 Tai ar y Cyd

Tai ar y Cyd is a collaboration between social landlords seeking to develop a standardised pattern book for the next generation of high performing, timber constructed homes. Supported by Welsh Government, the pattern book is designed to be built to common performance specifications which will incrementally work towards achieving net zero carbon in operation and make a step change in reducing embodied carbon in construction.

Published in early 2025, the pattern book will be used by the member social landlords to build new affordable housing and help meet the demand for new homes. This will promote investment and build confidence in a sustainable and local supply chain that can increasingly use Welsh timber. This will in turn enable the growth of Welsh SMEs and the development and refinement of green skills to deliver better quality and, over time, contribute to reducing build costs.

Tai ar y Cyd adopts a two-tier approach to operational carbon by setting a Baseline Standard (aligning with AECB CarbonLite) while establishing that projects should aspire to the Enhanced Standard (Passivhaus Classic). This establishes rigorous yet achievable standards that promote and prioritise energy efficiency to be complemented by on-site renewable generation energy to achieve net zero.

As the project seeks to improve energy efficiency and reduce carbon emissions it applies the Passivhaus methodology. Space heating demand - as calculated in PHPP - is the primary metric complemented by EUI.

The Baseline Standard mirrors the requirements of the AECB Carbonlite New Building Standard. This uses the Passivhaus methodology and assesses the same criteria but applies a relaxed space heating demand < 40 kWh/m²/yr and EUI threshold of < 75 kWh/m²/yr.

The Enhanced Standard requires compliance with the certifiable criteria of Passivhaus Classic. Dwellings must therefore demonstrate space heating demand < 15 kWh/m²/yr or peak heating load < 10 W/m²/yr. While Passivhaus criteria uses Primary Energy (PE) or Primary Energy Renewable (PER) the EUI threshold is < 35 kWh/m²/yr.

Assessment must be undertaken in PHPP by suitably qualified professionals. This would include AECB Approved Modellers, Certified Passivhaus Consultants and Designers or consultants/ designers with demonstrable experience in the use of PHPP.

Section 3: Proposals

3.1 Site Layout & Orientation

Menai Avenue comprises infill development on 3 irregularly shaped and unoccupied parcels of land within Croeserw: this focuses on Sites 2 & 3. All are generally bordered by residential development to the South and West with the A4063/ Pen-y-Byrn to the North, adjacent hilltop of Foel Fawr to the North-West and a common - surrounded by residential development - to the East. Topography generally falls steeply down to the North-East.

As these sites are immediately adjacent to the brow of Foel Fawr the average altitude of nearly 290m must be acknowledged. This will result in a colder climate than would be experienced at lower altitudes.

The site layout (Figure 4) demonstrates the attempt to achieve a South-East orientation for at least one primary elevation while battling the topography. Blocks step down with the slope of the hill, resulting in properties further East being lower than their neighbours with increased shading impact. Existing homes will remain untouched which introduces some non-negotiable shading objects; alongside this, a number of mature trees are scheduled for retention but these are not considered to be within the sun path of the proposed dwellings.



Figure 4: Excerpt from 2754-(03)102B - Site Layout

3.2 Heat Loss Form Factor

Heat loss form factor is a relative measure establishing the ratio of internal heated volume to external surface area, i.e. surfaces through which heat will be lost. This be used as an indicator for the efficiency of the dwelling: a lower form factor means there will be less opportunity for heat loss through the fabric.

The proposed mix comprises apartments, walk-up flats, houses and bungalows. Apartments will achieve the best form factor followed by (semi-detached) walk-up flats and semi-detached houses: bungalows are notorious for achieving a relatively poor form factor. To counter this, HT 212 is always plotted in a semi-detached configuration to reduce the effective heat loss surface and therefore increase the energy efficiency of the dwellings.

As above, attaching units reduces form factor to increase the latent energy efficiency of the dwellings. This represents a cost and material effective method of reducing heat demand that aligns with policy directives.

3.3 Glazing Quantity, Distribution & Shading

Every habitable room is provided at least one operable window and every dwelling unit (except the corner apartment in HT 213) achieves operable windows in parallel elevations. The fenestration hierarchy proposes the largest windows to living rooms and bedrooms with opening sizes reducing in kitchens and bathrooms to account for higher sills.

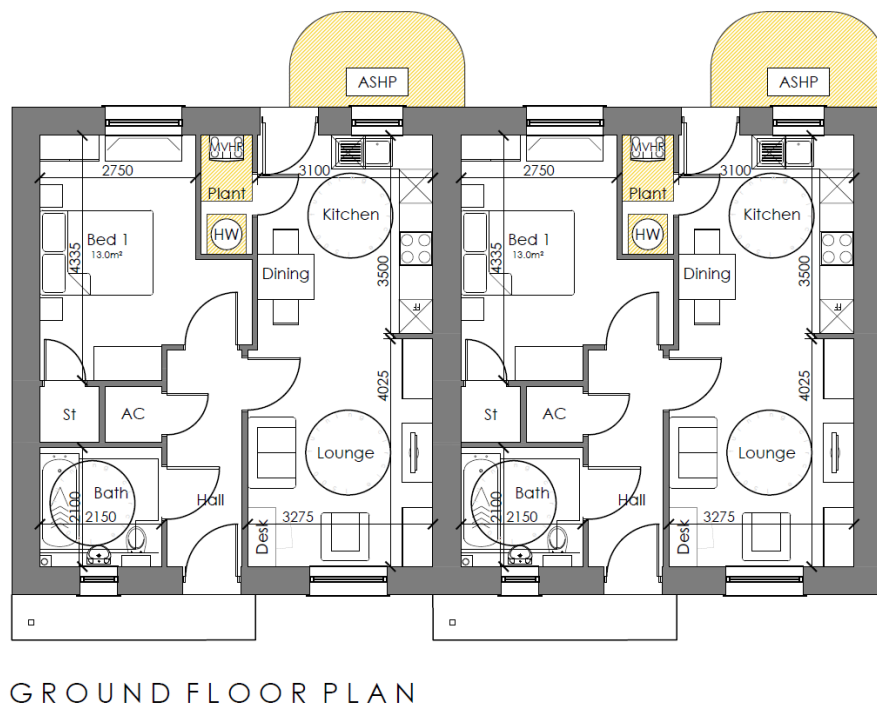


Figure 5: Excerpt from 2754-212(03)200 - HT 212 Floor Plans



Figure 6: Excerpt from 2754-212(03)300 - HT 212 Elevations

Fenestration design prioritises large opening casements to provide purge ventilation. All units have generous external reveal depths, positioned within the thermal line to reduce thermal bridges and use the rainscreen to passively occlude the high summer sun and mitigate overheating potential while admitting the low winter sun for beneficial solar gain.

3.4 Building Fabric

Spring Design has been appointed to develop a unified, site-wide fabric specification for the dwelling units to ensure all achieve a space heating demand less than 40 kWh/m²/yr. This aligns with national policy to prioritise reducing energy demand within dwellings and the requirement of Tai Tarian's specification to prioritise a fabric first approach.

Factor	Limit	Units	Notes
Building Fabric			
External fabric u-values	floor	0.110 W/m ² K	Appendix E threshold
	walls	0.130 W/m ² K	Appendix E threshold
	roofs	0.110 W/m ² K	Appendix E threshold
Thermal bridges	0.050	W/mK	
Air permeability	1.50	m ³ /m ² /hr	AECB CarbonLite Building Standard threshold
Doors & Windows			
Frames	U _f	1.30 W/m ² K	Appendix E threshold
Glazing	U _g	1.30 W/m ² K	Appendix E threshold
	g-value	0.63	Appendix E threshold
Entrance doors		1.00 W/m ² K	Appendix E threshold
Door/ window reveals		0.153 m	
Ventilation			
Air supply rate	30	m ³ per person	balanced mechanical ventilation with heat recovery
Summer Ventilation			
MVHR			summer bypass controlled by temperature
Windows			closed to stress test dwellings for climate resilience

Figure 7: Excerpt of anticipated fabric for Notional Specification

This fabric specification follows fundamental low energy building principles. As the exemplar international standard of low energy design, Passivhaus delivers buildings with a c. 90% reduction in heating demand versus the performance of the average UK home. It achieves this by integrating five complementary concepts:

- high levels of insulation;
- high levels of airtightness (low levels of air permeability);
- high performance external doors and windows;
- high performance mechanical ventilation with heat recovery;
- mitigation of thermal bridges.

While precise results will vary from plot to plot, the proposed building fabric will apply these principles to achieve the shared AECB CarbonLite and WDQR 2021 space heating demand threshold of 40 kWh/m²/yr and a meaningful reduction in heating demand. This is the priority defined by Welsh Government's Energy Hierarchy for Planning.

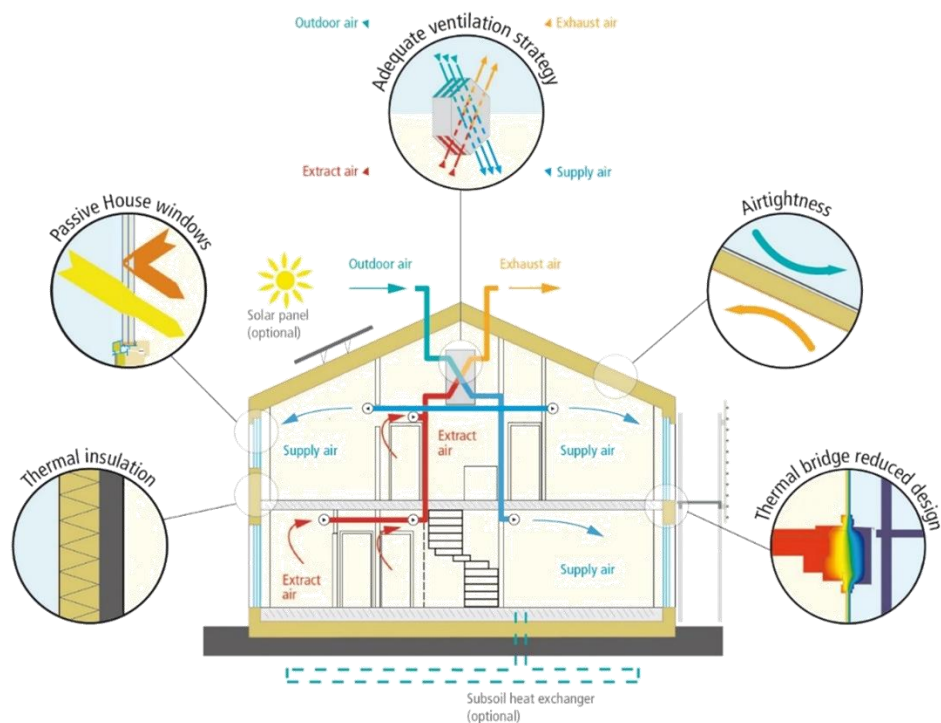


Figure 8: Diagram illustrating Passivhaus principles, property of Passivhaus Institut

3.5 Mechanical Services

Proposals for mechanical services should be considered indicative to inform the design stage PHPP, SAP and predicted EPC. Specialist subconsultant and subcontractor input will be required to fix the final mechanical plant specification for each individual house type.

Factor	Limit	Units	Notes
Ventilation			
Air supply rate	30	m³ per person	balanced mechanical ventilation with heat recovery
MVHR unit	83	% heat recovery	EnviroVent energisava 300
Supply & exhaust ductwork	length	TBC	measured individually for each dwelling
	diameter	0.16	
Ductwork insulation	0.05	m	assume non-reflective ArmaFlex closed cell insulation
	0.04	W/mK	
Heating, DHW & Distribution			
Heating appliance	45	°C	ASHP – heat delivered by low temperature radiators
Domestic hot water	60	°C	ASHP
HWT & pipe insulation	0.05	m	assume non-reflective ArmaFlex closed cell insulation
	0.04	W/mK	

Figure 9: Excerpt of anticipated mechanical services specification for Notional Specification

The fabric specification of the dwellings reduces heating demand to lower the necessary input from building services. Aligning with Welsh Government's Energy Hierarchy, these have been designed to first prioritise a reduction in heating demand - where mechanical systems can contribute to the fact - then the efficient use of energy, then aim for on-site renewable energy generation.

Following this hierarchy and Tai Tarian's target air permeability rate of 3m³/(h⁻¹m²) or less at 50Pa, natural ventilation was disqualified from consideration as unsuitable for a less airtight dwelling. Proposals have been developed to incorporate mechanical ventilation with heat recovery (MVHR) to complement the fabric first building specification: further, this supports a reduction in heating demand.

MVHR is a ventilation system that continuously extracts stale air from areas of moisture and odour generation (bathrooms and kitchens) within the building and supplies fresh, filtered air to habitable areas. Integral heat exchangers ensure the incoming fresh air is warmed by the outgoing exhaust air to reduce the heating requirement. The design stage PHPP, SAP and EPC will apply the EnviroVent energisava 300 units which recover 83% of exhausted heat.

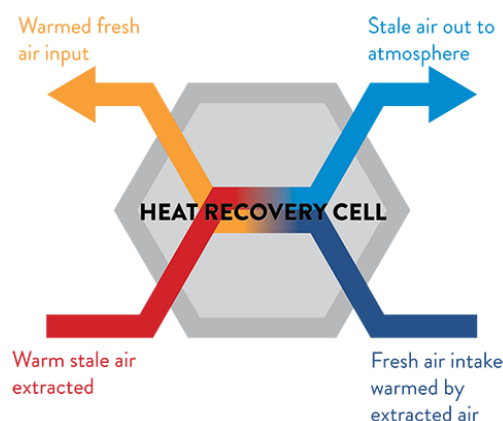


Figure 10: Diagram illustrating principle of heat recovery, property of Xpelair

Heating and hot water needs are met by electrically-powered heat pump technologies. The design stage PHPP, SAP and EPC will apply the Vaillant aroTHERM which are air source technologies with coefficients of performance (COP) c. 3.66 at 40°C flow temperature. The COP relates to the efficiency of the unit averaged across the year: this translates into every 1 kWh of electrical energy input producing 3.66 kWh of heat energy.

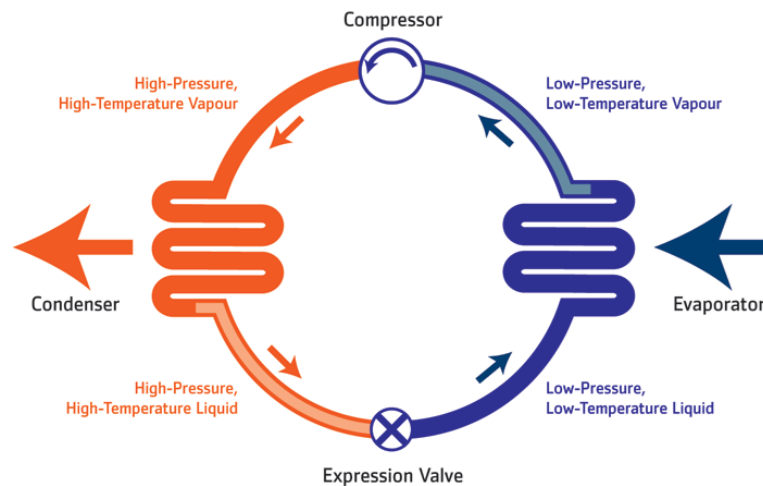


Figure 11: Diagram illustrating principle of heat exchange, property of Carmichael Browns

These high-efficiency, electrically powered heating systems are appropriate fossil fuel alternatives that contribute to the decarbonisation of dwellings and a significant reduction in primary energy demand.

Photovoltaic panels are proposed on all appropriately oriented roof slopes. On-site renewable provisions will reduce occupant energy demand from the grid: the systems are designed with hot water diverters so occupants benefit from hot water production even if electrical devices aren't actively used while the sun is shining.

3.6 Overheating

Approved Document O (Wales): Overheating (2022) and Welsh Development Quality Requirements 2021 require all flats and those dwellings without opening windows in parallel elevations to undergo CIBSE TM59: Design methodology for the assessment of overheating risk in homes (2017).

As the house type range has been designed for climate resilience, all dwellings incorporate passive solar strategies to manage and mitigate solar gains including opening windows in parallel elevations to promote the efficacy of purge ventilation. This additional assessment is therefore limited to the flats of HT 211 and HT 213 at Plots 1-9, 10-15 and 22-31; a suitably qualified professional will be appointed to undertake this analysis.

Section 4: Summary

This **Energy Strategy Statement** has established the legislative context of the proposals and described the fabric first methodology that has informed their development.

Through a fabric first approach complemented by appropriate low carbon technologies, the proposed dwellings will achieve a meaningful reduction in heating demand as the priority defined by Welsh Government's Energy Hierarchy for Planning.

Further, it has been demonstrated that the proposed building design - in combination with an appropriate fabric specification and mechanical services - suitably mitigates summer heat gains to maintain a comfortable internal environment without recourse to active cooling. This aligns with policy to passively protect occupants from overheating.

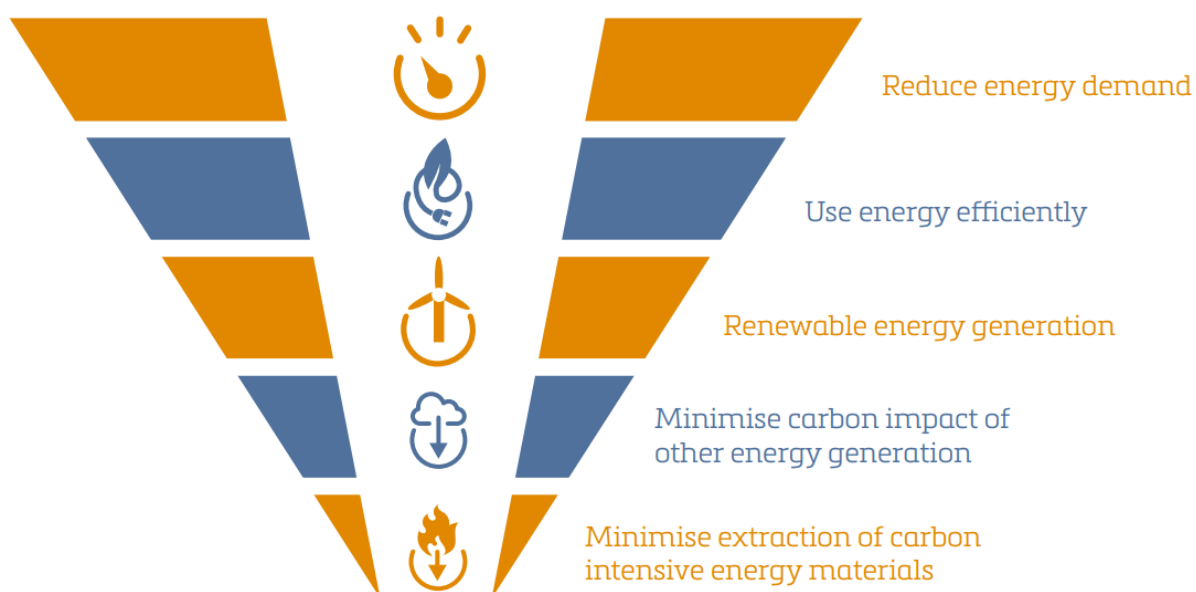
Section 5: Appendix

5.1 Planning Policy Wales - Edition 12

Excerpts from pages 93-95.

Energy Hierarchy for Planning

5.7.13 Welsh Government planning policy recognises an energy hierarchy. The Welsh Government expects all new development to mitigate the causes of climate change in accordance with the energy hierarchy for planning, as set out in the following energy policies. Reducing energy demand and increasing energy efficiency, through the location and design of new development, will assist in meeting energy demand with renewable and low carbon sources. This is particularly important in supporting the electrification of energy use, such as the growing use of electric vehicles and heat pumps. All aspects of the energy hierarchy have their part to play, simultaneously, in helping meet decarbonisation and renewable energy targets.



[...]

Reduce Energy Demand and Use of Energy Efficiency

5.8 Sustainable Buildings

5.8.1 The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and

adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures.

5.8.2 The Welsh Government's policy is to secure zero carbon buildings while continuing to promote a range of low and zero carbon technologies as a means to achieve this.

5.8.3 Sustainable building design principles should be integral to the design of new development. Development proposals should:

- mitigate the causes of climate change, by minimising carbon and other greenhouse gas emissions associated with the development's location, design, construction, use and eventual demolition; and
- include features that provide effective adaptation to, and resilience against, the current and predicted future effects of climate change.

5.8.4 In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission.

5.8.5 Planning authorities should assess strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon, in their development plan. In bringing forward standards higher than the national minimum, which is set out in Building Regulations, planning authorities should ensure the proposed approach is based on robust evidence and has taken into account the economic viability of the scheme.

5.8.6 TAN 12: Design and Practice Guidance: Planning for Sustainable Buildings provides guidance on sustainable building design. Design and Access Statements should show how sustainable building design principles have been considered in the design process.

5.8.7 Developers should take into account future requirements for carbon reduction in new buildings when designing their schemes, as a result of changes to Building Regulations in Wales. Being mindful of any future changes will ensure design aspects of requirements are considered as early as possible.

5.2 Welsh Development Quality Requirements 2021

Excerpt from [WDQR 2021](#) pages 2-3.

1. Homes should be of high quality, innovative and sustainable

[...]

c) Adopt best practice in moving to a decarbonised and circular built environment by considering:

- Assessing and reducing upfront and embodied carbon during the design and construction phases, and when undertaking refurbishment.
- Evaluating the potential for reuse of existing buildings, specifying reused and recycled materials and ensuring that buildings can be adapted, reused or deconstructed and recovered materials re-used or recycled at end of life.
- Maximising the efficient use of timber in construction to increase carbon storage in harvested wood products in Wales.
- Minimising operational carbon by reducing operational energy demand and where appropriate, using on site renewables.
- Ensuring there is sufficient provision for the collection of key recyclables and storage of food waste in homes.
- Undertaking as-built assessment of whole life carbon and post occupancy evaluation of the building's performance in relation to the design intent.
- Once upfront, embodied and operational carbon are minimised, using robust offsetting schemes to move to net-zero whole life carbon.

[...]

d) New homes must meet energy and decarbonisation requirements which consists of:

- Achieving EPC A (SAP92 or greater) through the minimum fabric standard set out in "Appendix E" – Elemental specification for the DER/TER, within the Building Regulations Approved Document Part L Wales 2020 and by not using fossil fuel fired boilers to provide domestic hot water and space heating. Alternative proposals will be acceptable where it can be demonstrated by independent certification that the building's energy demand is reduced in accordance with the Energy Hierarchy for Planning in Welsh Government's Planning Policy Wales.
- An assessment of overheating risk based on the CIBSE TM59 methodology (for 'Category 1 buildings'), which demonstrates compliance with the CIBSE TM59 compliance criteria, for the following dwelling types:
 - o Apartments/Flats.
 - o Houses which do not have two or more parallel aspects to facilitate cross-ventilation.

REQUIREMENT 1(d)

Question

What "Alternative proposals" are acceptable for Requirement 1(d) compliance?

Response

If "alternative proposals" are non-fossil fuel and can be demonstrated to reduce energy demand in accordance with the Planning Policy Wales "Energy Hierarchy", the resulting SAP score will be accepted for SHG technical scrutiny and grant.

In practice this will most likely mean engaging suitably qualified professionals to design and model the performance of a building using the AECB/Passive House Planning Package (PHPP) to show that the building's energy demand has been satisfactorily reduced in line with Welsh Government planning policy. Suitably qualified professionals would include Certified Passive House Designers/Consultants or designers/consultants with demonstrable experience in the use of PHPP.

If presented with this alternative approach, the PHPP output would be expected to demonstrate that heating energy demand for the building is 40 kWh/m²/year or less and the designers would need to provide PDFs of the complete PHPP model at each technical scrutiny stage (Concept, Planning and Post Completion Review) accompanied by a short compliance statement. It is accepted that SAP modelling of the alternative approach may not yield an EPC A energy rating.

Please note that an alternative approach should not be seen as a way of targeting a SAP energy rating lower than EPC A, rather that we will accept the advice of an independent expert who demonstrates a reduction in energy demand in accordance with our requirements which may or may not yield EPC A depending upon the design.

5.3 Approved Documents F, L & O

Excerpt from AD F (Wales): Dwellings (2022) pages 17-19.

Table 1.2 Minimum extract ventilation rates for continuous extract systems⁽¹⁾

Systems

Room	High rate	Continuous rate
Kitchen	13 litres per second	The sum of all extract ventilation in the dwelling on its continuous rate should be at least the whole dwelling ventilation rate given in Table 1.3
Utility room	8 litres per second	
Bathroom	8 litres per second	
Sanitary accommodation	6 litres per second	

Note:

1. If the continuous rate of ventilation provided in a room is equal to or higher than the minimum high rate specified in the table, no extra ventilation is needed.

Whole dwelling ventilation

1.23 Supply air for the dwelling should be delivered through either:

- Continuous supply fans
- Background ventilators

1.24 The minimum whole dwelling ventilation rate for the supply of air to the habitable rooms in a dwelling should meet both of the following conditions:

- a. A minimum rate of 0.3 litres per second per m² of internal floor area (this includes all floors, e.g. for a two-storey building, add the ground-floor and first-floor areas).
- b. A minimum rate determined by the number of bedrooms, as specified in Table 1.3.

Table 1.3 Minimum whole dwelling ventilation rates^{1,2}

Number of bedrooms	1	2	3	4	5
Minimum ventilation rate by number of bedrooms (l/s)	19	25	31	37	43
Notes: 1. Where the dwelling has only one habitable room, a minimum ventilation rate of 13 l/s should be used. 2. For each additional bedroom, add 6 litres per second to the values in Table 1.3.					

[...]

Table 1.4 Purge ventilation openings

Opening type	Minimum total area of openings
Hinged or pivot windows with an opening angle of 15 to 30 degrees	1/10 of floor area of room
External doors Opening sash windows Hinged or pivot windows with an opening angle of greater than or equal to 30 degrees	1/20 of floor area of room

1.31 Hinged or pivot windows with an opening angle of less than 15 degrees are not suitable for **purge ventilation**.

Excerpt from AD F: Dwellings (2022) page 22.

Table 1.6 Types of ventilation system

System type	Dwellings covered by the guidance
Natural ventilation (paragraphs 1.47 to 1.59)	Less airtight dwellings
Continuous mechanical extract ventilation (paragraphs 1.60 to 1.66)	All dwellings
Mechanical ventilation with heat recovery (paragraphs 1.67 to 1.73)	All dwellings

Note: For situations outside the scope of Table 1.6, **expert advice** should be sought for the design, sizing and position of ventilators to provide effective ventilation.

Note: As defined in **Appendix A**, **less airtight dwellings** are dwellings which have one of the following.

- a. A design **air permeability** higher than $5\text{m}^3/(\text{h}\cdot\text{m}^2)$ at 50Pa.
- b. An as-built **air permeability** higher than $3\text{m}^3/(\text{h}\cdot\text{m}^2)$ at 50Pa.

1.46 Where a **dwelling** has **natural ventilation** and a measured **air permeability** that differs from the design **air permeability**, so that it is defined as a **highly airtight dwelling**, one of the following applies.

- a. **Expert advice** should be sought.
- b. A **continuous mechanical extract ventilation** system should be installed by following the guidance in paragraphs 1.60 to 1.66.

Note: **Continuous mechanical extract ventilation** systems are available as decentralised options. An intermittent extract fan may be replaced with a decentralised **continuous mechanical extract ventilation** system fan.

Table E1 Elemental Specification

Element or system	Specification
Opening areas (windows and doors)	Same as actual dwelling up to a maximum proportion of 25% of total floor area ¹
External Wall U-value (W/m ² K)	0.13
Corridor Wall U-value (W/m ² K)	0.18
Party Wall U-value (W/m ² K)	0
Roof U-value (W/m ² K)	0.11
Floor U-value (W/m ² K)	0.11
Windows, Roof Windows and Glazed Door U-value (W/m ² K)	1.3 (whole window u-value)
Rooflight U-value (W/m ² K)	1.6 (whole window u-value)
Windows, Roof Windows, Glazed Rooflights and Glazed Door g-value	0.63 ³
Opaque and Semi-glazed Door U-value (W/m ² K)	1.0
y-value (W/m ² K)	Based on the 'Option 2' psi values in Table R2 of SAP 10.1 except use of y=0.05 W/m ² K if the default value of y=0.20 W/m ² K is used in the actual building
Ventilation System Type	Intermittent extract fans with trickle vents
Air Permeability (m ³ /h·m ² at 50 Pa)	5
Air Conditioning	None
Heating system	Mains Gas
	If gas or oil combi boiler performing space heating in actual dwelling, instantaneous combi boiler; otherwise regular boiler Low temperature radiators (design flow temperature = 55°C)

Element or system	Specification
	Room sealed Fan flue SEDBUK 2009 89.5% efficient
Space Heating Controls	1. For a single storey dwelling in which the living area is greater than 70% of total floor area, programmer and room thermostat; 2. For any other dwelling, time and temperature zone control, TRVs; And in all cases: Modulating burner control Boiler interlock ErP Class V Heated by boiler (regular or combi as above)
Hot Water System	Separate time control for space and water heating If cylinder specified in actual dwelling: volume of cylinder in actual dwelling If combi boiler: no cylinder Otherwise: 150 litres If cylinder, declared loss factor = $0.85 \times (0.2 + 0.051 V^{2/3})$ kWh/day, where V is the volume of the cylinder in litres Cylinder in heated space Thermostat controlled Fully insulated primary pipework
Shower Flow Rate	8 l/min
Waste Water Heat Recovery (WWHR) Secondary Space Heating Fixed Lighting Capacity (lm) Lighting Efficacy (lm/W) Thermal Mass Parameter	Efficiency of 55% Utilisation of 0.98 None 185 x Total Floor Area 80 Same as actual dwelling For houses kWp = 40% of ground floor area, including unheated spaces / 6.5 For flats kWp = 40% of dwelling floor area / (6.5 x number of storeys in block) SE/SW facing, 45° pitch No/very little overshading
PV System	

Element or system	Specification
	¹ The Building Regulations do not specify minimum daylight requirements. However, reducing window area produces conflicting impacts on the predicted CO₂ emissions: reduced solar gain but increased use of electric lighting. As a general guide, if the area of glazing is much less than 20 per cent of the total floor area, some parts of the dwelling may experience poor levels of daylight, resulting in increased use of electric lighting. ² The orientation of the elemental building is the same as the actual building. See SAP 10 Appendix R for treatment of curtain walling (an allowance of +0.1W/m²K is made on the window U-value for thermal bridging within the curtain wall). The treatment of roof windows is also detailed in SAP 10 Appendix R (an adjustment factor of +0.3W/m²K is applied). ³ Higher g-values would also comply with the recipe as increasing solar gains reduced the space heat load. However, designers should be aware of the impact of g-value on the risk of overheating and optimise their choice accordingly.

Table 1.1

Residential building/unit type	Compliance approach
<i>Flats (including communal areas and communal corridors)</i>	Paragraph 1.2 to 1.3 should be followed.
Dwelling-houses with two or more parallel aspects to facilitate cross-ventilation.	These dwelling types are considered to adequately mitigate the risk of summer overheating when the minimum requirements of Approved Document F and Section 2 of this approved document are achieved. However, if ventilation is restricted due to noise, pollution, safety or security concerns (see Section 2), then paragraphs 1.2 to 1.3 should be followed.
Dwelling-houses without two or more parallel aspects to facilitate cross-ventilation.	Paragraph 1.2 to 1.3 should be followed.
Residential (institutional) <i>(including communal areas and communal corridors)</i>	Paragraph 1.2 to 1.3 should be followed.
Residential (other) <i>(including communal areas and communal corridors)</i>	These residential unit types are considered to adequately mitigate the risk of summer overheating when the minimum requirements of Approved Document F and Section 2 of this approved document are achieved. However, if ventilation is restricted due to noise, pollution, safety or security concerns (see Section 2), then paragraphs 1.2 to 1.3 should be followed.

[...]

Table 1.2 – Controlling overheating by minimising summer solar gains and heat removal

Mitigation approach	Minimising summer solar gains	Heat removal (Openable windows ¹ and ventilation louvers)
Single aspect residential buildings		
Approach S1	Maximum glazed area of 15% of floor area	Minimum free area of 12% of floor area
Approach S2	Maximum glazed area of 20% of floor area Glazing with a maximum g-value of 0.4.	Minimum free area of 10% of floor area
Dual aspect residential buildings		
Approach D1	Maximum glazed area of 15% of floor area	Minimum free area of 12% of floor area
Approach D2	Maximum glazed area of 35% of floor area Glazing with a maximum g-value of 0.4.	Minimum free area of 12% of floor area
Approach D3	Maximum glazed area of 35% of floor area External shutters with means of ventilation on all facades. Overhangs with 50° altitude cut-off can be used instead of external shutters on south façades*. * i.e. walls with a south east to south west facing orientation	Minimum free area of 12% of floor area
Note: ¹ When calculating the free area for heat removal on hinged or pivot windows, for calculation purposes, the maximum opening angle that is practical and safe to achieve can be used, however, with a limit of 60°.		

5.4 Tai Tarian Design Principles & Specification

Excerpts from pages 3-4.

ENERGY STATEMENT

As one of the largest housing associations in Wales, with over 9,000 homes, we recognise our responsibility to minimise the impact on our environment. That is why, in 2019, we announced our commitment to become carbon neutral by 2030.

[...]

The homes we provide are one of the largest contributors to our carbon footprint. We want to provide homes that are sustainable in their construction, maintenance and use. We also want them to be affordable for their occupants.

Our approach is still being developed but at the heart of all development and regeneration projects will be:

- Achieving an A rated EPC for all new build and regeneration projects following the “fabric first” approach
- Heating/cooling solutions that work for occupants, both in terms of cost and thermal comfort
- Measurement of embodied carbon and operational energy
- Improving links with the cyclical and foundational economies
- Collaboration and partnership working
- Implementation of smart technology to support the energy strategy identified
- A mixture of carbon reduction and green energy generation

We ask that all of above be incorporated into the design and specification and considered when proposing/procuring products and materials.

SECTION 1 - DESIGN FEATURES

[...]

The external components and finishes of all dwellings are to consist of **low maintenance** materials, wherever possible, with consideration given to whole life-cycle costs.

Tai Tarian is continually looking at ways to improve the accommodation provided to its tenants and, as such, a great emphasis is placed on the energy efficiency of the building fabric. Key performance requirements contained within this document shall be achieved by the contractor.

Particular attention shall be paid to air permeability with a performance target of 3 or less to be achieved via pressure testing; this can be 5 provided that “EPC A” rating is achieved through design/specification combination.

The contractor shall use the relevant manufacturers ‘Thermal Bridging Details’ to ensure the maximum Thermal bridging efficiency is achieved.



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