**Building Regulations review to look at TRV requirements**

With all the focus on the new requirements for heating controls with replacement boilers under ‘Boiler Plus’, it was easy to overlook the fact that that this policy again ignored the opportunity to mandate TRVs when a boiler is replaced. The BEIS consultation response said that while there is “no doubt that TRVs can have a significant impact” the priority should be just to improve consumers’ awareness of how to get the best use out of them.

This seems such a missed opportunity given the evidence that there are over 30% of homes without TRVs, and a boiler replacement, when the system is already drained down, is the perfect time to fit TRVs. It’s also inconsistent with the other options under Boiler Plus that are there to improve the efficiency with which the boiler operates, given that the principles of effective energy conservation would mean that you should reduce waste heat (e.g. through the addition of TRVs) before improving the efficiency with which you produce that heat.

Fortunately, it seems that the blinkered view of UK Government towards this highly effective energy saving technology may be overridden by the revised version of the EU Energy Performance of Buildings Directive which was voted through in April of this year. The final text of which says that: “*Member States shall require new buildings, where technically and economically feasible, to be equipped with self-regulating devices for the separate regulation of the temperature in each room or, where justified, in a designated heated zone of the building unit. In existing buildings, the installation of such self-regulating devices shall be required when heat generators are replaced, where technically and economically feasible*.”

If it’s not immediately obvious, what this means in practice is that any boiler replacement carried out in the EU should be accompanied by work to ensure that individual room temperature controls, such as TRVs, are in place.

The Energy Performance of Buildings Directive (EPBD) is designed to reduce energy use in buildings as a means to tackle climate change, given that buildings account for 40% of all energy use in the EU. This Directive does not apply directly as regulation in individual countries but relies on those countries to implement it in ways that are suitable for local conditions. In the UK this tends to be through instruments such as Part L of the Building Regulations which are adapted to ensure that the requirements of the EPBD are met. So we should expect that that these requirements for individual room controls will soon be a requirement of the Building Regulations.

It is expected that the final EPBD will be formally approved and to enter into force at the beginning of June. From that moment the Member States will have 20 months to transpose the Directive in the National Legislation, so this should be active in the UK by early 2020. Of course, the one thing that could change this is the small matter of Brexit but at the time of writing it appears that the UK will agree a transition period for leaving the EU, which would mean that legislation such as EPBD would continue to apply and be enforced so it does seem that this will come into being.

Some reading this might be confused by the fact that the installation of TRVs with a boiler replacement is not a requirement as it used to be a requirement in the regulations. It’s true that up until the 2006 regulations this was the case, but then it was quietly reduced to only being ‘good practice’ when a boiler is replaced, and a requirement for new systems only. Anecdotally we know that many installers continued to install TRVs after the regulation changed as they firmly believe that this is the best way to deliver an effective heating system to their customers. But over the course of time there have been increasing numbers of installers realising that they are being undercut by others who are quoting for systems which meet the minimum requirements and no more. The obvious reaction in such circumstances is to make sure you get the job by following suit and this means that less homes are having TRVs installed than there were, even where the installer recognises that this may not be the best approach.

Hopefully we will see these requirements for individual room temperature controls coming back into force very soon. Given that a recent report by eu.bac, the European Association for Building Automation and Controls, showed that the additional installation of TRVs will pay for itself six times over, as well as providing better internal comfort, it will be householders who benefit most.

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