



28 April 2023

Carbon monoxide alarms: consultation from Welsh Government

Introduction

The Wales Safer Communities Network was established in January 2021 following the recommendations of the Welsh Government's Working Together for Safer Communities Review. The Network aims to become the strategic voice for community safety in Wales, working collaboratively to champion and support community safety partnership working, and influence the shaping and development of national policy and local practice.

Community Safety partners include Fire and Rescue Services, Public Health, Councils, Police, Probation and the third sector.

A separate response may be submitted by the Welsh Local Government Association (WLGA).

Consultation Response

Question 1: Do you support the Welsh Government's proposal to amend the statutory guidance (Building regulations guidance: Part J (Heat producing appliances) supporting Part J of the Building Regulations, to require carbon monoxide alarms to be fitted alongside the installation of a flued fixed combustion appliance of any fuel type?

If no, please provide your reasoning and evidence.

Response: Yes, for the reasons laid out in the consultation paper.

Question 2: Do you agree that 'connected spaces' should be excluded as part of the above proposal?

Response: In principle. However it may be appropriate to include that if the connected spaces are repurposed into main living spaces, such as playroom, bedroom, gym etc, that a carbon monoxide alarm would need to be installed as part of the change of use.

Question 3: Do you agree that where a flue passes through spaces such as a bedroom, they should be excluded as part of the above proposal?

If no, please provide your reasoning and evidence.

Response: No, when people are asleep they are at most risk and unaware to the dangers, where a flue runs through a bedroom we feel an alarm should be installed unless there are no joints in the flue in that space and then it may be more proportionate for an advisory to be provided on where the flue runs if not obvious in the room.

Question 4: Do you agree that flued cookers should be included as part of the above proposal?

If no, please provide your reasoning and evidence.

Response: We agree in principle that for flued cookers should be included, but only if the cost of installing and running them is low.

Question 5: Do you think that the guidance in Approved Document J (outlined above) on what type of carbon monoxide alarm should be installed requires updating?

If no, please provide your reasoning and evidence

Response: Yes, we think that the minimum should include the standards for any carbon monoxide alarm which must be met to meet the requirements. This may assist in slightly reducing the cost of insurance if a minimum quality standard is applied and is clear and advertised. We agree in laying down the quality standards to be met but not the type, make or model.

Question 6: Do you think that the guidance in Approved Document J on where carbon monoxide alarms should be situated requires updating?

Response: Possibly to incorporate the positioning of multiple carbon monoxide alarms, but it may need to be flexible as increasingly there are mobile applications that can identify the optimum position for items such as WiFi in the future these could be extended to, if not already, to the optimum position for carbon monoxide alarms and smoke alarms.

Question 7: Do you agree with the cost estimates and the overall Impact Assessment?

If no, please explain what you consider an appropriate cost range and provide evidence to show why.

Response: No comment on the figures provided, however from an equalities impact assessment the impact of those negatively impacted by socio-economic factors who

may struggle to pay for heating and hot water as it is could be impacted by the cost of running the carbon monoxide alarms.

Question 8: Please use this question to provide any other commentary or observations you have on the proposal

Response: No additional comments.

Question 9: We would like to know your views on the effects that the proposals would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Response: No comment or suggestion.

Question 10: Please also explain how you believe the proposals could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Response: No comment or suggestion.

Response submitted by:

Name: Sarah Capstick
Position: Business and Network Development Manager
Organisation: Wales Safer Communities Network, hosted by WLGA
Address: One Canal Parade, Dumballs Road, Cardiff CF10 5BF
Email: saferscommunities@wlga.gov.uk or sarah.capstick@wlga.gov.uk
Telephone: 07384469664