

Understanding Photographic Evidence in Part L

Elmhurst Energy & NHBC



1



Introductions



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2

Housekeeping

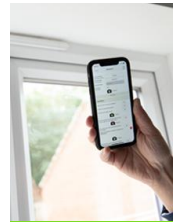
- Recording
- Video/audio
- Asking questions
- CPD certificates
- Slides
- Q + A follow up



3

Agenda

- **Elmhurst - AD L 2021**
 - Background
 - AD L 2021 requirements
 - The OCDEA's role
 - FAQs
- **NHBC**
 - Building Control Process
 - Examples from BREL reports
 - Builder Responsibilities
- **Q + A**



4

AD L 2021 – APPENDIX B



5



AD L 2021 – Appendix B



- AD L 2021 introduced 15th June 2022
Tightened fabric standards, wider adoption of low carbon technologies.
- Performance gap concerns
FHS consultation identified issues around quality of energy assessments, build quality etc.
- BREL report
To be provided to the Building Control Body and homeowner.

6



What's the OCDEAs role?

The BREL requires the OCDEA to 'review' the photos, what does this mean?

- The photographs should be used to ensure the SAP assessment reflects the as built specification of the home.
- Photographs should be cross referenced to the SAP assessment.
- An OCDEA is not required to comment on workmanship or design that is outside of the scope of the SAP assessment unless they have the competence to do so.
- Photos should be stored alongside other evidence and submitted for QA audits.

The Building Safety Act (2022) places responsibility to demonstrate compliance with Building Regulations with the 'Client'/'Contractor'.

13



Missing Photos?

- If the builder is unable to provide any photographs they are not compliant with Appendix B of AD L: Volume 1 - the BREL should not be signed.
- Solutions to resolve this have included;
 - Use default psi values – will likely result in compliance issues.
 - The builder opening up some areas of the building fabric for each home where photos are not available.
 - Alternative forms of documentary evidence may be acceptable for example written statements, certificates of blown fibre insulation etc.

14



Photo Evidence & EPC Auditing

On 1st February 2025 accreditation schemes introduced photo evidence into the mandatory evidence requirements for EPC audits.

- Photo evidence used to sign the BREL must be provided.
- Where photo evidence unavailable, documentary evidence required to explain how BREL was signed is needed.
- The auditor will review the photo evidence against the as built SAP assessment.
- Typical issues found so far include different boiler models, cylinder details and a missing electric battery.

15



Elmhurst Support

- Two technical bulletins available on Access Elmhurst.
- Can be passed to your clients if needed.
- 1.75 hours CPD.



16



Photo evidence in FHS

- Remains in Appendix B of AD L 2026.
 - More information added into Section 6; Building Services;
6. Building services: for all plant associated with space heating, hot water, ventilation and low or zero carbon technology equipment within or on the building, to show the following:
- Plant/equipment identification label(s), including make/model and serial number.
 - Continuity of insulation of primary pipework.
 - Where a heat pump is installed, continuity of insulation of the primary pipework up to the thermal envelope of the dwelling, i.e. where primary pipework from the heat pump enters the dwelling.
 - Where a hot water storage vessel is installed, the hot water storage vessel space, including at least 1 metre of pipework insulation of sufficient quality from the hot water storage vessel towards the water outlets.
 - Continuity of insulation of mechanical ventilation ductwork (for duct sections outside the heated living space).



17



FAQs

Are photos needed for every plot?	Yes, AD L: Volume 1 states "Photographs should be taken for each dwelling on a development".
Does this apply to new conversions/extensions?	No, only newly constructed dwellings.
What is needed for blown insulation?	Appendix B of AD L: Volume 1 states "For blown fill, photos should show clean cavities and clean brick ties with very limited mortar droppings."
Are the same photos needed for apartments?	The requirements in AD L: Volume 1 Appendix B are the same for all types of dwelling. However some photos may not be applicable such 3A/B (roofs) in mid floor flats.
Do I need to retain a copy of the photos?	Yes, BREL reports are signed documents used to demonstrate compliance with the Building Regulations and should be provided to the occupant of the new homes. Elmhurst expects photographs to be stored alongside other evidence compiled for completing Building Regulation compliance reports and EPCs.

18