



PART P – 2006 EDITION

By Jon Elliott

Part P has changed

The original Approved Document P Electrical Safety came into effect on 1 January 2005. Its purpose, as with all other Approved Documents was to provide practical guidance for some of the more common building situations.

Part P of Schedule 1 to the Building Regulations (England and Wales) has been amended in an attempt to provide greater clarity of the requirement and to make enforcement more proportionate to the risk. To reflect these amendments, a new version of Approved Document P has been issued by the Department for Communities and Local Government (formerly the Office of the Deputy Prime Minister). This came into effect on Thursday 6th April 2006 and may be obtained from the ODPM website (www.odpm.gov.uk/electricalsafety)

What are the changes?

In the 2005 version, there were two requirements, P1 (Design, installation, inspection and testing) and P2 (Provision of information). The new version contains only one requirement, P1 (Design and Installation), which is reproduced overleaf.

Requirement P1, now entitled 'Design and installation' no longer refers to inspection and testing. However, this does not mean that inspection and testing is no longer required. Section 1 (Design, installation, inspection and testing, and provision of information) of the new Approved Document P states in sub-section 1.7 that; *Electrical installations should be inspected and tested as necessary and appropriate during and at the end of installation, before they are taken into service, to verify that they are safe to use, maintain, alter and comply with Part P of the Building*

Regulations and with other relevant Parts of the building Regulations.

The importance of certification is stressed in sub-sections 1.8 to 1.11.

Requirement P1 now also refers to the need to protect persons *operating, maintaining or altering* the installations. This wording originally appeared in P2, which has now been deleted. The provision of sufficient information requirement has been removed. However, sub-section 1.33 of the new Approved Document P states that *Sufficient information should be left with the occupant to ensure that persons wishing to operate, maintain or alter an installation can do so with reasonable safety.* Sub-section 1.34 reinforces the need to meet the requirements of BS 7671 regarding provision of information such as electrical installation certificates, labels, operating instructions, log books and in the case of larger more complex installations detailed plans.

New circuits are notifiable

The provision of new circuits remains a notifiable activity, as does the extension of existing circuits if the work is in a special location, or associated with a special installation.

Limits on application

Changes have been made to the limits on application for the purposes of clarification. It is now stated that Part P applies to electrical installations *in or attached to a dwelling.*

Attached buildings

It should be noted that it is now clearly stated in the additional notes to Table 1 (work that need not be

notified to building control bodies) and Table 2 (special locations and installations) that conservatories and attached garages are not special locations and work in such structures is only notifiable if it involves the installation of a new circuit, or if the supply for the location is taken from a kitchen or special location.

It would also be necessary to notify if a circuit is extended from it into a special location, as would be the case for example, if a socket-outlet was provided outdoors, or if a supply was taken to lights in the garden.

What about external wall lights and A/C units?

This brings us to another of the clarifications provided in the 2006 edition. Installation work involving the fitting of items such as air-conditioning units, wall lights or radon ventilation fans to an exterior wall is only notifiable if electrical connections are made outside of the building and not directly within the enclosure of the item of equipment. To clarify, installation of a wall light where the connections were made immediately behind the fitting would not be notifiable, but if connections were made inside an external joint box and then to a fitting the work would be notifiable. Similarly wiring directly to an air-conditioning unit would not require notification, but if the air-conditioning unit were supplied via a separate externally mounted isolator, notification would be required.

Where a new circuit is installed or where such items are supplied from an existing circuit involving work in a kitchen or special location or associated with a special installation notification would be necessary.

Requirement

PART P ELECTRICAL SAFETY

Design and installation

P1. Reasonable provision shall be made in the design and installation of electrical installations in order to protect persons operating, maintaining or altering the installations from fire or injury.

Limits on application

The requirements of this Part apply only to electrical installations that are intended to operate at low or extra-low voltage and are:

- (a) in or attached to a dwelling;
- (b) in the common parts of a building serving one or more dwellings, but excluding power supplies to lifts;
- (c) in a building that receives its electricity from a source located within or shared with a dwelling; and
- (d) in a garden or in or on land associated with a building where the electricity is from a source located within or shared with a dwelling.

In the garden

Outdoor lighting, except for lights fixed on exterior walls of a dwelling as described above, and provision of power to the garden are classed as special installations. As such, these are notifiable activities.

The installation of garden lighting consisting of CE-marked prefabricated components linked by plug and socket connectors is not notifiable provided that the final connection to the fixed wiring, if in a kitchen or special location, is made to an existing connection unit or socket-outlet.

Provision of a socket-outlet to the exterior of the property remains notifiable.

Connection to an existing outlet or isolator

It is not necessary to notify building control if connecting items such as electrically operated garage doors and gates to an existing isolator. It is also not necessary to notify if connecting / reconnecting / replacing items such as showers or cookers to an existing circuit.

Earthing and bonding

One of the most marked changes to have been made to Approved Document P is that installing or upgrading main or supplementary equipotential bonding is no longer a notifiable work activity. In the 2005 edition it was necessary to notify if such work took place in a kitchen or special location.

The situation is not so clear in the case of installing or upgrading main earthing.

Consumer unit change is not considered like-for-like replacement

Part P, as amended permits the like-for-like replacement of items without the need to notify building control locally. However, it is made clear that this does not apply to the replacement of consumer units, which is a notifiable activity.

Central heating control wiring

The provision of new central heating control wiring is notifiable regardless of the location of the cabling and even where the wiring does not extend into the kitchen or a special location such as a bathroom.

Persons carrying out notifiable work

The 2005 edition contained guidance on inspection and testing requirements for work undertaken by a contractor, who was a *competent person* registered with an *electrical self-certification scheme authorised by the*

Secretary of State, or a DIY worker. It did not cover in detail the requirements when work was carried out by electrically competent but unregistered persons.

This was not helpful to those persons who either worked as electrical contractors in the commercial / industrial sector, only occasionally carrying out domestic installation work and the substantial number of electrically competent persons no longer carrying out installation work on a day-to-day basis, but who nonetheless remain competent.

This issue has been addressed somewhat in the 2006 edition, which now refers specifically to the *installer not registered with a Part P competent person self-certification scheme but qualified to complete BS 7671 installation certificates*.

This clarification should help to reduce the workload of Building Control departments in meeting their duty to verify that electrical installation work in domestic premises is safe and in accordance with Building Regulations requirements.

The DIYer

When electrical installation work is carried out by persons who are not qualified to complete the appropriate BS 7671 requirements for inspection, testing, verification and certification the relevant local authority Building Control department must be informed prior to carrying out any notifiable work and a fee will be charged.

Building Control must then decide to what extent it will be necessary to inspect and test the electrical work in order to verify that the work is safe and complies with all the relevant requirements of the Building Regulations.

Building Control may choose to carry out the inspection and testing themselves, or they may engage a competent electrical contractor (an approved inspector) to carry out the verification work on their behalf.

In either of the cases mentioned, an Electrical Installation Certificate may not be issued. If verification of the work is carried out by local authority Building Control, they will issue a Building Regulations Completion Certificate. If the verification was undertaken by a private Approved Inspector a Final Certificate will be issued.

It is stated clearly in sub-section 1.28 that *Unregistered installers should not themselves arrange for a third party to carry out final inspection and testing. The third party – not having supervised the work from the outset – would not be in a position to verify that the installation work complied fully with BS 7671: 2001 requirements. An electrical installation*



certificate can be issued only by the installer responsible for the installation work.

The competent person not registered with a self-certification scheme

Electricians and other electrically competent persons, who can demonstrate to the satisfaction of the relevant building control officers that they are competent to correctly inspect, test and certify their installation work in accordance with BS 7671 requirements should provide the relevant electrical certification to accompany the work that they have carried out.

However, they will still be required to notify building control prior to starting work. The building control body must then decide to what degree it will be necessary for them to verify the installation work prior to their issuing the building regulation completion certificate (or final certificate if the function is carried out by a private Approved Inspector).

It will be the responsibility of the building control bodies either independently or collectively to decide upon what benchmark levels of experience and qualifications to expect electrically competent persons to possess. However, it is highly likely to be similar to the requirements laid down by the providers of registered competent person self-certification schemes. It is also likely to be based on an assessment of the standard of the electrical certification that is submitted.

The Building (Local Authority Charges) Regulations 1998 requires local authorities to produce their own schemes, in order for them to recover the cost of

carrying out their prescribed building control functions. This offers the real prospect of building control bodies introducing a lower fee in situations where the provision of reliable electrical certification from a competent, albeit non-registered contractor reduces their costs as they no longer need to incur the costs associated with providing an electrical inspector to certify the electrical work.

It is highly likely, however, that building control will need to verify that the electrical installation work has not had a detrimental effect on the installation with respect to other requirements of the building regulations. This will probably take the form of an inspection at the 'first fix' stage. As such, a fee will still be charged.

Registered competent installers

Although the use of a competent but unregistered contractor may result in a lower Building Control fee being charged where work is notified, contractors who regularly carry out electrical installation work in or around domestic premises will still find it more cost-effective to be registered with one of the self-certification schemes.

Being a registered Part P competent person has the benefit of the contractor not being required to notify Building Control locally prior to carrying out notifiable electrical installation work.

Details of all the competent person self-certification schemes may be obtained from the website of the Department for Communities and Local Government (formerly the Office of the Deputy Prime Minister) at www.odpm.gov.uk/electricalsafety.