



Consultation Response

PAS 2030/2035 – 2023 Update Public Consultation

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Elmhurst Energy
16 St Johns Business Park,
Lutterworth, Leicestershire, LE17 4HB
01455 883 236



Introduction

Elmhurst Energy are pleased that BSI are seeking a consultation on 'PAS 2030 and PAS 2035' and as such we are delighted to respond to the proposed changes.

The consultation has a number of proposed changes and we have responded to them below. We hope you find the responses considered and useful for taking retrofitting dwellings for improved energy efficiency forward in a progressive manner.

Executive Summary

Elmhurst Energy welcomes the commitment by BSI to revise the PAS regularly and appreciates the opportunity to be involved in the steering group for PAS 2035, representing retrofit assessors and coordinators. The simplification of the risk pathways seems to be a practical move to ensure the industry and stakeholders remain clear on what the requirements are for each retrofit project. The biggest challenge for PAS 2035 is maintaining quality whilst not increasing the cost of compliance through the process.

Questions and Answers

1. Retrofit Coordinator Site Visits

We support the completion of good quality retrofit projects and see site visits as an important part of this process when it is relevant and improves quality. We recommend that Retrofit Coordinators are given the ability to justify site visits based on a pragmatic and a risk based approach.

PAS 2030 imposes commitments on installers with regards to the work they complete and clearly they should take responsibility for this but in addition, work closely with coordinators who must be aware of installations with an enhanced risk and ensure they are visiting site as appropriate. Stipulating a minimum of two site visits will bring with it increased cost and it is our opinion that these costs may be detrimental to the overall process and not necessarily bring further levels of quality.

We also have some concerns with regards to the impartiality of the process in particular when the Retrofit Coordinator is employed by the Installer, any issues identified by the coordinator on a site visit need to be impartially reported and rectified.

Adopting a similar process to that now adopted in Building Regulations under Part L 2021. The builder/developer is required to take photographs that are location, date and time stamped. This ensures that what has been installed can be reviewed

remotely. We should utilise modern technology as part of our solutions. We feel it may be a good compromise between cost and quality.

2. Traditional Buildings Change

We acknowledge the challenges surrounding improving older buildings and support the need to take additional measures to ensure that any improvements measures benefit the building in both the short and long term without any unintended consequences.

3. Level 3 Award in Energy Efficiency and Retrofit of Traditional Buildings;

With regards to the broadening of the need for additional qualifications to assess, design and coordinator projects on traditional buildings, we support increasing the knowledge base of all those involved. We do have concerns about the intricacies of the course for all roles and we recommend a more targeted approach to ensure the right levels of knowledge and understanding is appropriate for each role. Rather than require a broad brush approach to the subject that doesn't solve the knowledge gap and maybe irrelevant to some roles.

Increasing the knowledge and training of a Retrofit Assessor will continually be incorporated into the existing training course and continued personal develop as per their scheme requirements without the need for them to study the full additional Level 3 qualification.

We feel that the requirements for each role are very different when it comes to understanding traditional buildings. The current courses available do not cater for this. A Retrofit Assessor needs to understand what to identify and collect for the Retrofit Coordinator, Designer and Installers. They do not need to understand the same level of detail that a Retrofit Coordinator, Designer or Installer does. We feel branding the same qualification to each PAS 2035 role is not going to solve the problem and cause additional costs and unnecessary work.

Finally, we are concerned there will be a bottle neck of retrofit professionals looking to obtain this qualification to ensure they can work without the capacity in the market to deliver this. The change to the requirement introduces many more properties under this requirement and will slow down the delivery of retrofit.

4. Risk Path Changes

The suggested simplification of risk paths to more towards the number of measured rather than the risk of the measure overall is broadly supported as a change and we believe this will make the overall process easier. The change would standardise the expected procedure for all properties and improve consistency and understanding for all involved.

5. Retrofit Coordinator/Designer Responsibilities

Currently PAS 2035 allows for a Retrofit Coordinator to take on the responsibility of the design function, we believe this should only be in cases where they have the competency to do so. The current Level 5 Coordinator qualification does not itself provide competency for the design of all measures.

The increase qualification requirements for the role of Designer do not seem appropriate in most situations and again we suggest a risk based approach could be adopted and believe in most cases the current qualifications listed in PAS 2035 are sufficient.

We also strongly support the addition of Chartered Association of Building Engineers (CABE) into this list of approved qualifications for Designers.

6. Change to Air Test Requirements

We do not believe it is possible to set a target airtightness for a building without measuring or understanding its actual airtightness in the first instance. Having an already airtight building and installing fabric measure may result in the building needing additional ventilation. It is not acceptable to simply assume or guess that additional ventilation is needed or not. Whilst we understand there are cost implications of pre & post air testing, we have concerns that if these tests are not completed there will be a number of unintended consequences. There is a very high risk that the installation of fabric measures could result in the building becoming more air tight and no longer have effective ventilation. Requirements under Part L and Part F building regulations have recently been brought in line to ensure we do not have unintended consequences described above. Airtightness testing is a vital part of the assessment pre, and evaluation post for ensuring a quality fabric measure retrofit.

Furthermore, we strongly recommend that if any airtightness test is undertaken the PAS highlights that it should be completed by a qualified approved airtightness testers following CIBSE TM23. Such as those on the Elmhurst Airtightness Scheme which is currently recognised as part of building regulations. Any airtightness test

issued is publically available and follows a quality assurance procedure to ensure the person doing the test is competent, qualified and insured. We suggest PAS advises that any airtightness test completed has a certificate through a competent persons scheme to ensure consumer protection.

7. Medium Term Plan (MTP) & Improvement Option Evaluation (IOE)

We welcome the proposal to incorporate the inclusion of a MTP & the IOE in all projects regardless of rick path and the number of measures proposed. We would also encourage the completion and retention of these documents even in situations where the project is not completed. The MTP informs the client of the potential opportunities open to them to improve their property regardless of current funding options.

8. Retrofit Advisor/Advice

We are broadly supportive of the proposal to remove the role of Retrofit Advisor and put this responsibility under the role of the Retrofit Coordinator. We believe that all roles within the process should be prepared to provide advice as long as they have competence to do so.

9. Evaluation

The principle of evaluation is very much supported. Ensuring it is completed at the relevant stages of the process and not done as simply a tick box exercise. We have concerns with regards for the need more deeper evaluation which may be impractical without homeowner buy-in.

There appears to be a reference to a physical inspection post install as part of this process but it is unclear if this is an additional site visit required by the coordinator, if so we need to be aware of the rising administrative costs being added to each project.

Contact Details

Should you require any further clarification, please contact us at:



Elmhurst Energy
16 St Johns Business Park,
Lutterworth,
Leicestershire,
LE17 4HB



01455 883 250



enquiries@elmhurstenergy.co.uk



www.elmhurstenergy.co.uk



elmhurst
energy