



Consultation on PAS 2035:2019+A1:2021 PAS 2035:2019 + A1:2021 Retrofitting dwellings for improved energy efficiency - Specification and guidance

Submitted 6th September 2021

5.1

- Comment: The embodied energy in existing buildings should be considered. Adding retrofit has a carbon cost and much of it may fail and need replacing and this should also be considered.
- Change: PAS may be aimed at being publicly accessible but the cost makes them prohibitive for the public and it is unlikely to be effective amongst the public unless it can be made more accessible and reasonably priced. Procedure guidance such as this needed to provide practical guidance for getting work done correctly at important points such as with designers, practitioners and homeowners.

5.6.1

- Comment: Without a qualified Retrofit Adviser being required the measures which are implemented could be ill advised and wasteful both of home owners money and the carbon costs.
- Change: Ensure advice is given to Homeowners. Allow low cost access to the PAS.

8.4 Path B

- Change: Moisture investigations should be required to be carried out in accordance with the Agreed Methodology for 'Investigation of Moisture and its Effects in Traditional Buildings'.

9.2.4

- Change: Replace "particularly with architected appearance" with "particularly with regards to its appearance"

13

- Comment: The public need accessible, free guidance on potential retrofit projects.
- Change: Homeowner-friendly guidance and advice explaining the PAS 2035 approach should be made freely available. Also link to "Planning Responsible Retrofit" and other advice published by the Sustainable Traditional Buildings Alliance.

A1.2

- Comment: The scope needs to be further widened including full members of the Institute of Historic Building Conservation

- Change: add after "or"... "a full member of the Institute of Historic Building Conservation"

A.1.3

- Comment: The scope needs to be further widened including full members of the Institute of Historic Building Conservation
- Change: After 'protected building' insert the words 'and traditionally constructed buildings' after "or"... "a full member of the Institute of Historic Building Conservation"

A.1.3

- Comment: The major difference between traditionally constructed buildings and modern buildings needs to be understood as they require different treatment. Modern solutions for traditional buildings can result in detrimental unintended consequences. The proposals only require additional training in older buildings as the performance of the building will be the same and the training needed the same
- Change: After 'protected building' insert the words 'and traditionally constructed buildings'

A.3.3

- Comment: The scope needs to be further widened to include full members of the Institute of Historic Building Conservation
- Change: after "or"... "a full member of the Institute of Historic Building Conservation"

A 3.4

- Comment: The scope needs to be further widened to include full members of the Institute of Historic Building Conservation
- Change: after "or"... "a full member of the Institute of Historic Building Conservation"

NOTE 6.1.5

- Comment: Retrofit Coordinator should always be independent not ideally
- Change: Replace 'Ideally' with 'Always'