iATS response to:

The Future Homes Standard: Chapter 5 Airtightness

Prepared for: MHCLG

February 2020

Introduction

The independent AirTightness Testing Scheme (iATS) is pleased that MHCLG are consulting on 'The Future Homes Standard' and as such we are delighted to respond to the questions within Chapter 5 Airtightness.

We hope you find the responses considered and useful for creating a net zero carbon future.

Questions and Answers

Chapter 5 Airtightness

Q48 Do you agree that there should be a limit to the credit given in SAP for energy savings from airtightness for naturally ventilated dwellings? a. Yes b. No If no, please explain your reasoning.

b. No

iATS does not agree that there should be a limit to the credit given in SAP for energy savings from airtightness for naturally ventilated dwellings. Dwellings that are very airtight should not be penalised within the SAP methodology for inadequate design and installation of ventilation. Builders are encouraged to reduce air leakage in order to improve thermal performance of dwellings and implementing this limit could hinder this.

Q49 Do you agree that the limit to the credit should be set at 3m3/m2.h? a. Yes b. No – it is too low c. No – it is too high If no, please explain your reasoning and provide evidence.

iATS does not agree that a limit to the credit should be set at all. There could however be a warning within the SAP software to highlight, at both design stage and as built stage, where the ventilation system may be incompatible with the airtightness of the property. This should also be included within the proposed BREL compliance report.

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Q50 Is having a standard level of uncertainty of 0.5 m3/m2.h appropriate for all dwellings undergoing an airtightness test? a. Yes b. No – a percentage uncertainty would be more appropriate c. No – I agree with having a standard level of uncertainty, but 0.5 m3/m2.h is not an appropriate figure. d. No – I disagree for another reason If no, please explain your reasoning.

d. No – I disagree for another reason

iATS do not believe having a standard level of uncertainty of 0.5 m3/m2.h is appropriate for all dwellings undergoing an airtightness test. Data should not be manipulated for fear of reducing the accuracy of the SAP calculation.

Q51 Currently only a proportion of new dwellings are required to be airtightness tested. Do you agree with the proposal that all new dwellings should be airtightness tested? a. Yes b. No If no, please explain your reasoning and provide evidence to support this.

a. Yes

Yes iATS agree that all new dwellings should be airtightness tested. The current sampling approach can lead to confusion, and potentially large differences in airtightness where a property to be tested is very airtight but subsequent dwellings of the same type, which are not airtightness tested, suffer from significantly more air leakage.

Q52 Currently, small developments are excluded from the requirement to undergo any airtightness tests. Do you agree with including small developments in this requirement? a. Yes b. No If no, please explain your reasoning and provide evidence to support this.

a. Yes

Yes iATS agree that small developments should be included in the requirement to undergo airtightness testing. The requirement for air tightness testing should not be dependent on the size of the development, all new dwellings should be tested with no exceptions.

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Q53 Do you agree that the Pulse test should be introduced into statutory guidance as an alternative airtightness testing method alongside the blower door test? a. Yes b. No If no, please explain your reasoning.

a. Yes

Yes iATS believe the Pulse test should be introduced into statutory guidance as an alternative airtightness testing method alongside the blower door test.

Alternative technology, as long as the technology is proven, can open up more opportunities for airtightness testers. Pulse, developed by BTS Limited (a sister company to iATS) has undergone extensive independent investigation to prove its value.

Q54 Do you think that the proposed design airtightness range of between 1.5 m3/m2.h and the maximum allowable airtightness value in Approved Document L Volume 1 is appropriate for the introduction of the Pulse test? a. Yes b. No If no, please explain your reasoning and provide evidence to support this

b. No

No iATS does not agree with the proposed design airtightness range of between 1.5 m3/m2.h and the maximum allowable airtightness value in Approved Document L Volume 1 for the introduction of the Pulse test. This could cause issues at the point of testing if the design airtightness was higher than the 1.5 m3/m2.h limit, but the finished building was more airtight than 1.5 m3/m2.h.

If Pulse is to be a genuine alternative to the blower door method there should be no limits set.

It is our understanding that BTS have been able to overcome the over-pressurisation experienced in very airtight buildings when initially conducting the field trials in 2018, and that further evidence has been submitted to the department to support this.

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Q55 Do you agree that we should adopt an independent approved airtightness testing methodology? a. Yes b. No Please explain your reasoning.

a. Yes

Yes iATS agree that an independent approved airtightness testing methodology should be adopted. It is important that the methodology is independent of all organisations with an associated competent person scheme so that all stakeholders have an opportunity to put their professional opinion forward, and have an input into the content of the testing methodology document. Periodic meetings should be held between key stakeholders to allow the methodology to be refined and to tackle industry queries.

Q56 Do you agree with the content of the CIBSE draft methodology which will be available via the link in the consultation document? Please make any comments here.

Having appropriate governance by CIBSE taking ownership of the testing methodology is a positive move. The proposed draft CIBSE TM23 document does however need work to make sure it structured for, and includes all required information for airtightness testers. More detailed comments regarding the structure and the content of the draft methodology shall be sent directly to CIBSE as requested. iATS will offer every support in strengthening the methodology.

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