



November 2021

iATS response to:

Scottish Building Regulations -
Proposed Changes to Energy
Standards and associated topics

Prepared for: Scottish Government

Introduction

The independent AirTightness Testing Scheme (iATS) is pleased that Scottish Government are consulting on 'Scottish Building Regulations - Proposed Changes to Energy Standards and associated topics' and as such we are delighted to respond to the questions in 'Part 2 – Energy, new buildings' regarding airtightness testing.

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

Questions and Answers

Question 14 – Do you support the move to airtightness testing of all new dwellings, by registered members of an appropriate testing organisation?

Yes.

Yes, iATS agree that all new dwellings should be airtightness tested, and testers should be registered with an appropriate testing organisation. 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.

Question 15 – Do you support the move to increased airtightness testing of all new non-domestic buildings, by registered members of an appropriate testing organisation?

Yes.

Yes, iATS agree that there should be a move to increased airtightness testing of all new non-domestic buildings, and testers should be registered with an appropriate testing organisation. Membership of a professional organisation ensures that testers have had appropriate training and are subject to periodic surveillance.

Question 16 – Do you support the adoption of CIBSE TM 23 as the basis for airtightness testing in Scotland?

Yes.

Yes, iATS agree that CIBSE TM23 should be adopted to provide consistency in testing procedures across the UK. 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.

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 have been sent directly to CIBSE as requested. iATS will offer every support in strengthening the methodology.

Question 17 – Do you support the introduction of the pulse test method of airtightness testing as a further means to testing and reporting on the performance of new buildings?

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.

Contact Details

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