



Construction Leadership Council

National Retrofit Strategy

Submission from CIBSE

1st March 2021

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The Chartered Institution of Building Services Engineers (CIBSE)

CIBSE is the primary professional body and learned society for those who design, install, operate and maintain the energy using systems, both mechanical and electrical, which are used in buildings. Our members therefore have a pervasive involvement in the use of energy in buildings in the UK with a key contribution to sustainable development. Our focus is on adopting a co-ordinated approach at all stages of the life cycle of buildings, including conception, briefing, design, procurement, construction, operation, maintenance and ultimate disposal.

CIBSE is one of the leading global professional organisations for building performance related knowledge. The Institution and its members are the primary source of professional guidance for the building services sector on the design, installation and maintenance of energy efficient building services systems to deliver healthy, comfortable and effective building performance.

CONSULTATION RESPONSE

CIBSE are overwhelmingly supportive of the strategy, both of the very fact of having one, which is very much needed, and of its content. Points we find particularly useful and/or which we particularly support include:

- The focus on skills and competence, and developing supply chains including initial phases with monitoring and evaluation to gather lessons for the later phases
- Putting in numbers the scale of the challenge, but also the potential benefits, and being clear about the need for an initial phase to underpin capability
- Promoting building passports as an essential element, including building surveys and a plan for every home, all of this made easier and of better quality with the help of digitisation
- Area-based delivery programmes, supported by a central Retrofit Delivery Agency
- A compliance and quality regime, embedding performance standards, and making use of PAS 2030/35. This is of particular importance to protect consumers and avoid not only detrimental consequences to environmental and health outcomes, but also reputational damages and setbacks on the way to net zero.

Our comments below are therefore suggestions for small changes or clarifications, without affecting our overall strong support:

- The strategy concerns the housing stock; we suggest this should be reflected in the title i.e. National Housing Retrofit Strategy. The non-domestic building stock also needs retrofitting, with its own challenges and solutions and its own strategy even though there will be common themes with the domestic sector.
- It would be useful to recommend more clearly that the strategy must identify and capture all opportunity, or trigger, points, for the retrofit works themselves or at least for the production of building passports.

- Page 7: the skills training modules refers to the PAS 2035 Retrofit Coordinator and the development of new skills and qualifications; we think it would be useful to refer explicitly to PAS 2030 qualifications for installers, alongside the PAS 2035 Retrofit Coordinator qualifications, as is done elsewhere in the document (otherwise it could be read to imply there are no such installers qualifications at the moment). There is also a need to consider developing the skills of building control professionals to enable them to better oversee retrofit works.
- Summary on page 9: it would be easier to the reader if numbers in all 4 boxes related to the same thing or were explicit e.g. either numbers (homes, jobs, capital etc) per year, or total over the period covered in that box. This is not currently entirely clear at first glance.
- Page 11 – the point is made about risks to financial institutions from poor works; consumers are also at risk, and this should be recognised more strongly in the strategy in a few places e.g. as driver for performance and standards (page 11, top half of the page), within the “creating consumer demand” section (page 13), and within the “compliance and quality regime” (page 14).
- Page 15 – risks: there is a huge risk to consumers and indeed to the industry and government if this retrofit programme is not well done and is badly enforced. This risk of weak compliance and enforcement and the risk that the building control regime does not pay enough attention should be mentioned. The CLC strategy should present this as really important to protect consumers, the industry and the politicians.

END

Please do not hesitate to contact us for more information on this response.