

TrustMark (2005) Limited  
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RG21 4EB

9<sup>th</sup> September 2019

Dear Sirs,

**RE: Trustmark – PAS2035**

We have long had concerns about the implications of poorly designed and implemented retrofit measures and the unintended dampness that can arise as a result. In fact, the Property Care Association (PCA) has spoken to thousands of chartered surveyors and other property professionals on this very subject.

As a trade association many of our members specialise in dealing with defects as a result of dampness in the built environment and have reported growing numbers of incidences of dampness as a consequence of retrofit. Naturally we have watched the events following the release of Peter Bonfield's Each Home Counts with great interest. Following the release of PAS2035 in June we were extremely pleased to see that a more wholistic approach is being advocated which will hopefully prevent these unintended consequences.

Whilst this is commendable, one concern is that it places the assessment of building services such as ventilation on limited criteria and principally assumes the presence of a ventilation system is sufficient. In our experience, assessment of ventilation is a specialist subject and making the assumption that it is adequate based solely on its presence without appropriate testing and assessment is likely to result in issues of dampness and mould which may potentially be harmful to occupants.

The document goes to great lengths to ensure that retrofit is tested and commissioned. We would argue that the success of the system is not limited to the testing and commissioning of the retrofit but also the supporting measures such as the ventilation. We believe this has been identified within the document when it states, *“the retrofit design shall identify the test certificates and commissioning records that are to be supplied to the Client via the retrofit Coordinator.”* However, in reality this is not simple.

Approved Document F – means of ventilation is arguably the least enforced of the building regs and recent studies have shown it is extremely rare for a ventilation system to have been installed and commissioned correctly. These studies have been on new builds and whilst we are unaware of any studies on the installations of ventilation in existing buildings, based on the experiences reported to us by our members we feel confident to say the situation is even worse in existing homes.

You may not be aware, but such works are notifiable to building control in advance or must be done by a competent person such as those registered on the BPEC domestic ventilation scheme. In addition, the system must be commissioned in accordance with Approved document F which is legislation and must be followed.

On the inside of the front cover of Approved Document F under “Changes in the legal requirements” you will note that “All fixed mechanical ventilation systems, where they can be tested and adjusted, shall be commissioned and a commissioning notice given to the Building Control Body”. The key term in this instance is ‘where they can be tested and adjusted’, and this term is repeated throughout the regulations and guidance documents that support them. To reiterate, this must be done to comply with British Building Regs and therefore the law.

### **So how does Trustmark avoid falling into this trap?**

Trustmark already endorse a number of contractors that have this level of expertise and are vetted to ensure that ventilation installations are in accordance with the building regulations.

The PCA Residential Ventilation Group (RVG) has long been vocal about the need for proper provision of ventilation which includes commissioning, as outlined in Approved Document F. It then set up a register of residential ventilation contractors that ensures correct commissioning which includes installation by a competent person or reporting the installation to building control, as well as testing of units to ensure they provided adequate flow rates.

Few can doubt the necessity for improvement of our existing housing stock to help reach our statutory national targets for the reduction of greenhouse gas emissions, but occupant welfare should not suffer as a result. What was also clear was that they couldn't continue with the poor quality of work which has resulted in the jaded reputation of the industry. We hope that the framework set out in PAS 2030 and PAS 2035 will make massive improvements in the quality of retrofit projects. However, we believe our members - which are registered with us as domestic ventilation contractors - can assist you avoid the mistakes from the past.

We believe there is no other point of reference which provides contractors which install to Approved Document F and meet the criteria already set out by Trustmark. We believe by working together we can prevent problematic damp problems occurring and give you peace of mind that you are engaged with competent contractors that met your standards.

We look forward from hearing from you.

Yours sincerely,

**James Berry**  
**Technical Manager**  
**Property Care Association**