

STBA Response –

TrustMark Licence Plus (TMLP) Consultation

Section	Comment
<p>* 7. Do you agree with the proposal that if a property falls outside of the scope of TMLP for GBIS, then the existing PAS 2035 process will apply? Properties to be regarded as out of scope of TMLP for GBIS include, but not are necessarily limited to:</p>	<p>Do not disagree with the list, except that there is a lack of definition for ‘heritage’ buildings throughout the document, and whether that means a designated heritage asset or a building of traditional material and construction typology. PAS-2035 treats ‘traditional and protected buildings’ as ‘heritage buildings’ and STBA recommends the same for this document should these changes go forward. Buildings of traditional construction are particularly prone to unintended consequences of measures designed to reduce heat loss and/or air leakage (see PAS-2035 Section 4.2.6), and while loft insulation is less of an issue than wall insulation, there are still risks.</p>
<p>* 8. Do you agree that the inclusion of the PAS 2030 principles of Pre-Installation Building Inspection and independent audit of Pre-Installation Building Inspections in the TMLP for GBIS, creates a mechanism to support ensuring that the property is suitable for the measure to be installed?</p>	<p>BS40104 revision to be published soon should be required.</p>
<p>* 11. Are there any aspects or issues in respect of the construct of TMLP for GBIS that you believe require consideration?</p>	<p>The STBA was an early proponent of the ‘whole-house approach’, arguing that single-measure interventions are inherently risky and that any planned interventions need to be considered holistically to the building fabric, its services, and occupants. While the addition of heating controls seemingly add very little risk, and loft insulation adds some moisture risk, the STBA is concerned in principle about the move away from a whole-house approach. This proposal, while currently limited, could set a dangerous precedent. Better to increase skills and competences in the sector to increase volumes, rather than lowering standards which is likely to have the effect of more low-quality and risky installations.</p>