

AHSS CONSULTATION RESPONSE

Submitted via email to: [mailto: heatinbuildings@gov.scot](mailto:heatinbuildings@gov.scot)

Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes

This consultation sets out the Scottish Government's proposals for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat network skills requirements. Whilst the primary focus is on retrofit work for homes, the Government believe some of these skill requirements will also be relevant for new-build housing and in certain circumstances non-domestic buildings. These requirements relate to retrofit installers, energy assessors, designers, advisors, evaluators and retrofit coordinators. Once implemented, these skills requirements will create a best practice standard for the sector, and will be a minimum requirement for Scottish Government-supported programmes. This consultation is seeking views on both the proposals and their implementation.

SUBMISSION TO THE SCOTTISH GOVERNMENT

The Architectural Heritage Society of Scotland (AHSS) welcomes the invitation to respond to the Scottish Government's consultation on *Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes* and the opportunity to influence policy.

The AHSS focusses on Scotland's built heritage, seeking to convey to stakeholders why a historic asset is of value and how it might be best preserved. It aims to be pragmatic in doing so, accepting that change is often required in order to retain or regain sustainable uses.

The AHSS has approximately 1,000 members and currently comprises five regional groups. The study of Scottish architecture is promoted by lecture series, conferences, publications, visits and study tours. The AHSS also provides advice to planning authorities and to Scottish Ministers about policies, guidance and applications which may give rise to effects upon the historic environment. Through its regional groups and, where appropriate, the National Conservation Committee, the AHSS comments upon applications for statutory consents which have, or are likely to have, a significant impact upon Scotland's built heritage. In the year 2019-20 the AHSS considered 4,877 cases.

The AHSS would welcome the opportunity to address any of the points raised in this paper and to assist the Scottish Government further alongside any calls for evidence that may follow.

This is an extensive consultation and the AHSS will only be responding to some of the questions as shown below.

Questions - Installer skills requirements

1a. Do you agree with our proposal to integrate the installer skills matrix into the Publicly Available Specification (PAS) 2030 and Microgeneration Certification Scheme (MCS) installer standards?

Yes No

- The AHSS does not intend to answer this question.

1b. Do you agree with our recommendation that manufacturer training should be in addition to, not instead of, these skills requirements?

Yes No

- The AHSS does not intend to answer this question.

1c. If you disagree with these proposals, please let us know why.

- The AHSS does not intend to answer this question.

2. What are your views on the timing for integrating the installer skills matrix into the PAS 2030 and MCS installer standards? What do you think would be a reasonable timescale for the making the skills matrix mandatory in the standards?

- The AHSS does not intend to answer this question.

3. What are your views on how installers can meet these skills requirements, in particular the Recognised Prior Learning (RPL) route?

- The AHSS does not intend to answer this question.

Questions- PAS 2035 requirements for other roles

4. What are your views on the competency requirements for the retrofit coordinator, advisor, assessor, designer and evaluator roles?

- It is clearly very important for heritage buildings that everyone dealing with them has the necessary skills to fit them for a greener tomorrow. It seems unlikely that the Scottish Government has got there yet. We recommend greater collaboration with Historic Environment Scotland.
- We would be interested to know if the Scottish Government has secured representation on the panel charged with revising PAS 2035:2019 or on the panel working on the new British Standard for the Assessment of Dwellings for Retrofit which will supersede paragraphs 8.2–8.6 on page 15 of PAS 2035:2019.
- It would be preferable for the Scottish Government to develop its own set of standards and make them available without charge on their own website, (as Historic Environment Scotland has done with their own Technical Standards

and guidance). British Standards Institution publications are expensive and we are concerned that small and medium sized businesses do not have access to them.

- The AHSS would like to see the Whole Dwelling Assessment include a maintenance assessment of the current state of the dwelling and a requirement that any repair and maintenance work be carried out ahead of energy efficiency measures. This is crucial, as without a whole dwelling assessment to ensure that the property has been maintained, any energy efficiency measures will not produce the expected outcomes.
- If the proposal is to bring in a new version of the EPC that is specific to Scotland (which would be welcome) it is not clear how will this sit alongside a UK-wide accreditation which is PAS 2035, in which retrofit assessor accreditation will be based on the current EPC system. Will we need a separate Scottish accreditation thus undermining the UK-wide compatibility expressed in the Heat Strategy document?
- The wording for the proposal in relation to the retrofit designer role for properties of Risk Grade C is inconsistent with the previous categories and also the requirements of PAS 2035, which requires a progressive increase in qualification through each grade.

This is recognised in the wording of PAS 2035 which states: “For projects assessed as risk grade C, and to which the requirements of Path C apply, and the building to be improved (or any part of it) is traditionally constructed or protected, the Retrofit Designer **shall also** be accredited or certified in building conservation”.

The wording should therefore be changed to reflect the actual requirements of PAS 2035, and the wording as it currently appears : “Risk grade C – same as risk B but for traditionally constructed buildings can also include:...” changed to: “For projects assessed as risk grade C, and to which the requirements of Path C apply, and the building to be improved (or any part of it) is traditionally constructed or protected, the Retrofit Designer shall also be accredited or certified in building conservation”.

Questions- Heat networks

5. What are your views on our plans for developing heat network skills? For example are there any gaps in heat network skills that we haven't identified?

- The AHSS does not intend to answer this question.

General questions

6a. What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in remote rural and island communities?

- The AHSS does not intend to answer this question.

6b. What impact do you think our skills requirements will have on the energy efficiency, microgeneration and heat networks sector in Scotland more generally?

- It is essential that potential skills providers and organisations are confident that there will be a requirement for the skills specified. There is no reference to the Historic Environment Scotland (HES)-led Skills Investment Plan for Construction, nor are HES research and technical papers cited. Whole Dwelling Assessments are required as a first step before the installation of any efficiency measures, and skills are required for these assessments and for building maintenance work.

7. What impact do you think our skills requirements will have on competition including training provision, quality, availability or price of any goods or services in the market?

- The AHSS does not intend to answer this question.

8. What suggestions do you have for how digital technology could be used effectively to meet our skills requirements?

- The AHSS does not intend to answer this question.

9. Are there any areas of skills we have not covered in this consultation that you think we should consider?

- Data is required as to the age, material construction, current maintenance, current ownership and existing interventions, and whether these have been effective, in relation to the buildings of Scotland. This has to go beyond the information in the Scottish House Condition Survey. Regional variations need to be included. The data needs to be overlapped with data in relation to warm homes and fuel poverty. Without this data it will be difficult to plan for materials and skill needs across Scotland.
- The skills to maintain and repair roofs, chimneys, dormers etc., and dispose of rainwater from roofs are critical and are not given sufficient weight in this document.
- Energy Performance Certificates as currently used do not accurately assess many traditionally built dwellings. An accurate base is required. The EPCs need to take traditional building qualities and embedded energy into account in a more nuanced way than they do at present, and higher quality training is required for the assessors.
- There is reference to some training courses to begin in 2021. The variety and scope of these courses will have to be increased rapidly thereafter. The Scottish Government considers that 1.4 million buildings need retrofitting. We are not convinced that the Scottish Government and the educational establishments have a sense of the numbers of skilled tradesmen, craftsmen and installers that would need to be trained in a short time to meet the targets.

- Tradespeople and administrators will require further specialist training and additional skills to deal effectively with 47,000 listed buildings and heritage buildings in conservation areas. In addition, traditionally constructed pre-1919 buildings need to be considered. Each listed building will need its own strategic plan to meet the requirements. A system of waivers for important buildings will be needed. These might, for instance, license some buildings only for use in the summer months or specify that only minimum background heating will be required, and, for example, that individuals might have to wear extra clothing.
- There is a role for local education and initiatives. The colleges should provide appropriate training courses sponsored by the enterprise boards, as well as the education authorities. The purpose of this would be to support a competitive, high-quality retrofitting supply market, capable of keeping pace with accelerating demand. This could be achieved by stepping up on-site training initiatives and establishing groups of local craftsmen able to provide a comprehensive, high quality retrofitting service. In addition, the government should improve the reliability and enforceability of energy performance diagnostics, and make retrofitting a central component of initial training in the building sector.
- Each local authority energy czar should manage a simple, authority-wide single aid scheme for households, modulated according to their resources and the energy performance level achieved. Such a scheme should be distributed by local one-stop-shops that provide support to owners during all phases of the project (the initial audit, the financial engineering and the technical set-up of the project, and the evaluation of the quality of the retrofit), while co-ordinating all public and private stakeholders in the market.

This would lead to a more effective marketplace and a more effective overall scheme more likely to achieve the Scottish Government's goals.

10. What support do you think would help the sector achieve these skills requirements?

- The AHSS does not intend to answer this question.

RESPONDENT INFORMATION:

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Responding on behalf of an **Organisation – The Architectural Heritage Society of Scotland (AHSS)**

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**

- I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**