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**RESPONSE TO OFGEM CONSULTATION
ON THE
ENERGY EFFICIENCY COMMITMENT 2005 – 2008:
INNOVATIVE ACTION**

Re:

3.5 External wall insulation is suitable also for cavity walled and non-traditional housing. Please also see the separate paper (as submitted to the EEP Hard-to-Treat Homes group) Appendix attached herewith: making points on the economics of re-rendering with an insulated render system and upon re-pointing.

3.5 The percentage increase in energy saving will be higher. Top of page 7, Absolute energy saving will also increase for external wall insulation as opposed to injected cavity wall insulation. line 4/5:

5.28 External wall insulation will improve walls to $0.27 \text{ W/m}^2\text{K}$ with ease with values down to as low as 0.2 or lower without great difficulty.

External wall insulation should therefore be considered for 'innovative action' 50% bonus credits.

Thank you for your consideration.

APPENDIX

*Paper issued on behalf of
Insulated Render & Cladding Association
Flexible Thermal Linings*

HARD-TO-TREAT HOMES SUB-GROUP ADVICE TO ABLE-TO-PAY SECTOR

BACKGROUND

The HTTH group have initiated the web-based matrix of measures advisory information service, largely for the benefit of social housing providers. It would seem sensible if this information was also provided to the able-to-pay and owner occupier sectors. Many fuel poor households are in the latter group.

It would also be sensible to publicise the steps that can be taken to improve the thermal efficiency of homes generally, by measures other than just the less costly measures available via the Energy Efficiency Commitment. There are some obvious prime matters to publicise.

MEASURES TO PUBLICISE

1. Homes which are unsuitable for low-cost injected cavity wall insulation – which obviously includes solid walled housing, but also a substantial percentage of cavity walled housing – may benefit from insulation of external walls by varying methods:
 - a. There are insulated render and cladding systems, with high thermal efficiency, that lengthen the life of buildings by improving weather proofing and visual appearance;
 - b. There are lower cost beads-in-render systems for trowelling onto either internal or external wall surfaces, also improving thermal efficiency;
 - c. There are rigid internal linings, which require decoration of the internal wall surface, but improve thermal efficiency;
 - d. There are lower cost flexible internal linings, which improve thermal efficiency and reduce mould growth and condensation. These can come self-decorated and are suitable also for the do-it-yourself householder.

RENDERED HOUSING

Several million solid walled and cavity walled homes are rendered. Render wears and needs renewal in due course. Removal of old render to replace with new, is common. The application of an insulated render system – without need to remove the old render – would generally be highly cost effective in comparison. Thermal efficiency would be greatly improved, as would weatherproofing, appearance, and acoustic performance. The relatively small percentage increase in cost should ideally qualify for an EEC grant.

BRICK RE-POINTING

Where housing requires all-round re-pointing of brickwork – as most masonry requires in due course – a similar case can be made (as with render, discussed above) for an insulated render or cladding system to be applied, to save the cost of re-pointing, and impart higher thermal efficiency and better weatherproofing. A brick finish can still be achieved, via a 'brick' render or brick slips. The economics are not quite so favourable as the render opportunity discussed above, but are worthy of consideration.

Re-pointing costs saved could be as high as 40/50% of the cost of a new external wall insulation system.

PUBLICITY

The carbon and energy saving and fuel poverty programmes, and achievements of targets, would be greatly assisted by the dissemination of the information outlined above, and other relevant information. We therefore request that the HTHH sub-group considers making recommendations, along the lines of the above, to the Partnership, the Trust, to the EEP Fuel Poverty Group, and DEFRA's Fuel Poverty Advisory Group.

Thank you.

*Representatives of the Insulation Strategy Group
On the Hard-to-Treat Homes Sub-Group:*

*Steven Leach
Flexible Thermal Linings*

*Alan Onslow
Insulated Render & Cladding Assoc.*

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