

## Template for response to “Administration of the Boiler Upgrade Scheme” consultation

<p>This template relates to “Administration of the Boiler Upgrade Scheme” consultation and contains all the questions posed within the document. Through this template we’re aiming to collect your feedback on our proposals on how we will administer the Boiler Upgrade Scheme. We welcome your views and encourage you to respond to the questions on the questions that are of most interest. Please provide your contact details in the fields below. To respond, please provide your views in the space below the relevant question.</p>	
Organisation Name:	National Custom & Self Build Association (NaCSBA)
Organisational Type:	Trade organisation
Completed by:	Andrew Baddeley-Chappell
Contact details:	<div style="background-color: black; width: 100%; height: 1.2em;"></div>
Confidential response:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Partially <input type="checkbox"/> Anonymous <input type="checkbox"/>

## Questions on the proposed administration of the Boiler Upgrade Scheme

<p>1. Do you agree or disagree with the proposed approach to evidencing existing heating systems? If you disagree, please say why.</p>
<p>We have no comment to make on this question</p>
<p>2. Do you agree or disagree with installers being the party to provide evidence to Ofgem regarding custom-build properties? If you disagree, please say why.</p>
<p>Please see or answer to Question 3</p>
<p>3. Is there any other evidence we should request to prove that properties are custom-build?</p>
<p>We note that the consultation states “Custom builds are eligible as long as evidence is provided confirming they are custom builds”. We note also that the consultation then goes on to “custom-build properties are built and owned by individuals, not companies.” A rationale is then provided as to why the scheme is applicable to custom build homes.</p>

We also recognise that the sitting definition of custom build homes to be adopted by OfGem will ultimately set out by Government, therefore this is primarily a matter for BEIS and not for OfGem. We note that a draft definition of “custom Build” appears within the draft regulation that sits behind this consultation. However, we believe there are important matters to raise at this point and to OfGem, that have a direct impact on our response to this question.

The first matter to raise is that the general term used by Government in relation to this form of housing supply is “self-build and custom housebuilding”. This is already defined within primary legislation – that is the Self-build and Custom Housebuilding Act 2015 as amended by the Housing & Planning Act of 2016. It should be noted that this legislation is itself under review and may change but it remains the primary legislative definition for the sector. That said different definition do exist elsewhere – for example in support of the Community Infrastructure Levy exemption which is referenced within the consultation. Providing an additional definition under the proposed regulations within this consultation is a further complexity to the sector and in our view is best avoided.

The need for consistency arises in part because we have concerns that the definition used in the consultation, and the information provided that we have seen to date, is too short to clearly reflect the full range of self-build and custom housebuilding homes. We recognise that this current approach reflects past language and is in many ways a continuation of the approach used under predecessor schemes. However this is a good opportunity to bring definitions into line.

In particular, we wish to raise issues with the statement that ““custom-build properties are built and owned by individuals, not companies.” Self-Build and custom build homes are built to the specification of individuals and are typically owned by individuals. They are however often built by companies for those individuals. In some cases – including terraces, apartments, and conversions a company will build the shell of the home to a set design and the individual will then specify the interior (including walls and layout). This may be at odds with the draft regulation which states, “*the property has not, while the building was built or at any subsequent time been owned wholly or partly by a person who is not an individual.*” In relation to this particular scheme the important point is not the ownership during the build but rather that it is the occupier, rather than any developer, who should be responsible for selecting the heating source that is selected and on which the grant is available.

We do accept that care must be taken to ensure that there is not abuse through the scheme for example where customers are given minimal choice. To help with this matter the challenge of defining the boundary with speculative development has been recently undertaken by DLUHC and Homes England in the development of their Help to Build equity loan product and we would suggest that they are engaged in this process.

In summary we suggest that OfGem and BEIS look to align with the existing legislative definition and take additional guidance from the Help to Build lending criteria.

These definitions are important when it comes to the question of evidence that properties are self or custom build. Currently that there is no single document that will in all cases evidence that a property is self or custom build. In most cases it will be clear from the



<p>planning permission and / or the finance arrangements for the build but a significant minority of homes fit neither of these criteria but would be fully accepted as a self-build or custom housebuilding home. For this reason, we believe that the most appropriate approach is to require customer declaration to be held by the installer as part of their administration. It will be for OfGem to determine if that documentation needs to be provided to them or retained by the installer for inspection. We would also encourage OfGem to undertake data checks seeking out similar systems on nearby homes to reduce the risk of misuse (although such events could happen in cases of Group self-build or simply through customer choice).</p>
<p>4. Do you agree or disagree with the proposed approach to evidencing that a property is not social housing? If you disagree, please say why.</p>
<p>We have no comment to make on this question</p>
<p>5. Do you agree or disagree with the proposal to use an API to access the information we need from a property's EPC? If you disagree, please provide alternative suggestions, including any evidence, to support your response.</p>
<p>We have no comment to make on this question</p>
<p>6. Do you agree or disagree with the approach to administering insulation exemptions? If you disagree, please say why.</p>
<p>We have no comment to make on this question</p>
<p>7. Is there any other evidence that Ofgem should consider when determining the eligibility of a low carbon heating system?</p>
<p>We have no comment to make on this question</p>
<p>8. Do you agree or disagree with our proposed approach to evidencing whether a property is connected to the gas grid? If you disagree, please provide alternative suggestions, including any evidence, to support your response.</p>
<p>We have no comment to make on this question</p>
<p>9. Do you agree or disagree with our proposed approach to evidencing whether properties are in a rural area? If you disagree, please provide alternative suggestions, including any evidence, to support your response.</p>
<p>We have no comment to make on this question</p>

10. Do you agree or disagree with our classification of parts that can and cannot be used before the heating system is first commissioned? If you disagree, please say why.
We have no comment to make on this question
11. Do you agree that the 'authorised signatory' for business accounts should be an individual with legal authority to represent the organisation eg a Director, Chief Operating Officer, Chief Executive Officer or Company Secretary? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We have no comment to make on this question
12. Do you agree or disagree with the proposed sets of user permissions? If you disagree, please provide alternative suggestions, including any evidence, to support your response.
We have no comment to make on this question
13. Should we collect other information contained on the quote for the purposes of assurance that the property owner has been consulted and reducing speculative applications?
We have no comment to make on this question
14. Do you agree or disagree with the proposed approach to obtaining evidence of property owner consent? If you disagree, please say why.
We have no comment to make on this question
15. Do you agree or disagree with the 7-day period for property owners to provide consent? If you disagree, please say why.
We have no comment to make on this question
16. Is there any additional information that you think should be included in the boiler upgrade voucher notification?
We have no comment to make on this question
17. Do you agree or disagree with our proposed approach to issuing vouchers? If you disagree, please say why.

We have no comment to make on this question
18. Do you agree or disagree with the proposed approach to administering applications for voucher redemption? If you disagree, please say why.
We have no comment to make on this question
19. Do you agree or disagree with weekly payment cycles? If you disagree, please set out why?
We have no comment to make on this question
20. Do you agree or disagree that installers should be required to inform property owners about the possibility of audits at the application stage and to confirm this to Ofgem? If you disagree, please say why.
We have no comment to make on this question
21. Do you agree or disagree with our proposed administration of withholding payments? If you disagree, please say why.
We have no comment to make on this question
22. Do you agree or disagree with our proposed administration of offsetting payments and requiring repayments? If you disagree, please say why.
We have no comment to make on this question
23. Do you agree or disagree with our proposed administration of the right of review? If you disagree, please say why.
We have no comment to make on this question
24. How frequently would you like Ofgem to publish reports on vouchers issued and available budget? Please provide a frequency and your reasoning behind it.
We have no comment to make on this question
25. What additional information could be included in the reports? Do you have any suggestions for additional information that could be included in reports, or on the format of the reports?

We have no comment to make on this question