



**The South West Association for  
Energy Assessors & Residential Property Surveyors**  
[www.dchi.org.uk](http://www.dchi.org.uk)

Mr W Broad  
Ofgem  
9 Millbank  
City of London,  
Greater London  
SW1P 3GE

22 September 2013

Dear Mr Broad

On behalf of our association I would like to submit the following response to the consultation regarding **requirements for demonstrating characteristics of hard-to-treat cavities**.

***“1. 100% verification of narrow HTTC measures***

*This proposal relates to HTTC measures installed to a cavity wall which is less than 50mm (‘narrow HTTC measure’). For information about narrow HTTC measures see the ECO Guidance for Suppliers 5.14(4).*

*We propose that prior to the notification of a narrow HTTC measure a Narrow HTTC Declaration Form (Appendix 1) must be completed by a person with appropriate skills and experience who is:*

- ☐ an employee of the supplier; or*
- ☐ independent of the supply chain (this includes independence from the installer, third party agents, surveyors, social housing providers etc, but does not require independence from the supplier).*

*The person who signs the declaration must personally assess the site that is the subject of the declaration. We recommend that the assessment take place before installation of the measure is complete so that additional drilling is not required.*

*A supplier can use an equivalent declaration form as long as it contains all the information within the Narrow HTTC Declaration Form at Appendix 1. The supplier must retain the declaration and make it available upon request by Ofgem. (Ofgem may also request the other documents and data listed in the ECO Guidance Appendix 1.)”*

*This appears to represent a serious trust issue given that the installer needs to be an approved individual or organisation working to tightly regulated procedures. To avoid adding cost to the process unnecessarily it would be beneficial to establish an appropriate set of evidence which could be provided perhaps by the installer using, and photographing the use of, suitable measuring and inspection equipment during the installation. It should only be installations which cannot be sufficiently evidenced by the installer where a separate assessment needs to take place.*

*We are however unable to readily identify from the available documents the definition of “a person with appropriate skills and experience”. This appears to be a role for which a Home Inspector / Residential Property Surveyor would be a logical and beneficial choice and we would like to see that group of qualified property professionals specifically included.*

## **“2. Increased requirements on HTTC measures that require a chartered surveyor’s report**

*This proposal relates to the following sub-categories of HTTC measure:*

- ☐ Non-standard insulation materials and techniques - ECO Guidance 5.14(2)*
- ☐ Substantial remedial works - ECO Guidance 5.14(3)*
- ☐ Uneven cavity in natural stone walls - ECO Guidance 5.14(6)*

*With respect to each of these sub-categories, existing legislation and policy requires that there be a chartered surveyor’s report stating the characteristics of the cavity wall. Our proposal supplements this requirement by specifying requirements relating to the timing of the report, the content of the report and the expertise of the chartered surveyor.*

*We propose that the chartered surveyor’s report must be:*

- ☐ dated before installation of the measure; and*
- ☐ prepared using the revised Ofgem chartered surveyor’s report template (Appendix 2). A supplier can use an equivalent declaration form, provided (i) it includes all of the content in the template in Appendix 2, and (ii) it is submitted to Ofgem for approval before first use.*

*The chartered surveyor who writes this report must:*

- ☐ be either a chartered building surveyor or a chartered surveyor who has qualified through the residential survey or valuation pathway.”*

*This appears to be a very restrictive practice in that many of these will be generalist surveyors who do not necessarily have the required skill set without specialist training/CPD and there are other buildings professionals equally capable of performing the task with the same specialist training/CPD. Specifically, qualified Home Inspectors / Residential Property Surveyors should not be excluded from this market.*

*As well as avoiding a ‘closed shop’ for a specific group of surveyors it is important to address the fact that there is a shortage of chartered surveyors already that will be exacerbated by limiting this role to them. Our research indicates that once those who have undertaken the training this week pass the exam there will only be some 80 registered ECO Chartered Surveyors.*

## **“3. Increased technical monitoring**

*This proposal relates to:*

- ☐ Narrow HTTC measures;*
- ☐ HTTC measures requiring remedial works;*
- ☐ HTTC measures with non-standard materials or techniques.*

*We refer to these measures as ‘relevant HTTC measures’.*

*The existing policy for technical monitoring of ECO measures is contained in the ECO Guidance paragraphs 13.7 to 13.39 and the Technical Monitoring Questions are available at:  
<https://www.ofgem.gov.uk/publications-and-updates/energy-company-obligation-technical->*

monitoring-questions. This proposal involves a modification of that existing policy for relevant HTTC measures.”

*We have no specific submission with regards to the proposed changes.*

*We are however unable to readily identify from the available documents the definition of “a suitably qualified third party” (13.10 of the ECO Guidance) who is able to carry out the technical monitoring. This again appears to be a role for which a Home Inspector / Residential Property Surveyor would be a logical and beneficial choice and we would like to see that group of qualified property professionals specifically included.*

I hope the above comments are useful and the role that Home Inspectors / Residential Property Surveyors can play in this market will not be overlooked.

Thank you for your attention.

Yours faithfully



Ian Sturt  
Vice Chair, DCHI

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