

Mr W Broad
Ofgem
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23 September 2013

Dear Mr Broad

On behalf of our Institute 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.)”

The installer needs to be an approved individual or organisation working to tightly regulated procedures so we would question why this is included.

To avoid adding cost to the process an appropriate set of evidence requirements should be established and which could be provided / satisfied 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 have been unable to easily 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 want to see this 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 with ‘Chartered’ status will be generalist surveyors who do not necessarily have the required skill set without further 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 therefore be excluded from this market.***

As well as avoiding a ‘closed shop’ for a specific group of surveyors it is important to address the issue that there is already a shortage of Chartered Surveyors this will only exacerbate the problem of inspection by limiting this role to them. Research indicates that once those who have undertaken the training this week and pass the exam, there will still only be some 80 registered ECO qualified Chartered Surveyors to service the whole of the UK.

“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 concerned that we are 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.

Again this appears to be a role for which a Home Inspector / Residential Property Surveyor would be both a logical and beneficial choice and we would wish to see that group of qualified property professionals specifically included or a well presented case for their exclusion that we could argue.

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



W.M.Crompton
Chairman

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