

Dear Mr Broad,

We have been made aware of the consultation exercise by one of our members and would like you to be aware of the following.

Our Association represents specialist contractors who specialise in damp control and property preservation. Over the last few months a number of members have been approached by insulation contractors who wish to tap into ECO funding on HTTC properties. Unfortunately it seems that a number of EOC registered insulation providers have indeed attempted to use the “substantial remedial works” element, cynically in order to gain access to funding.

We have recently warned members against undertaking works at the request of insulation companies; that is those unnecessary or “inappropriate” for the property. We have reminded members that though the financial rewards for providing a few hours of waterproofing or damp proofing works may be good, (especially when this is based on an incomplete report and specification provided by others), the long term liabilities for what is often an incomplete treatment or unnecessary work, sanctioned by a non-specialist surveyor, could remain with them.

Our concerns are as follows.

1. Problems associated with damp are amongst the main reasons for considering buildings necessary of substantial remedial work. *\*content redacted due to its commercially sensitive nature\**
2. Chartered surveyors are in the most part “generalists” rather than specialists in damp. They are being offered derisory fees for inspections that can in no way cover the cost of good diagnostic investigations. We do not see how a cursory look at a building can lead to the assertion that buildings are hard to treat or require work that will enable insulation work.
3. Insulation companies have an incentive to classify buildings as hard to treat and are telling surveyors how to reach and document this conclusion.
4. Chartered surveyors are being used to legitimise sharp practice. Unless they are required to take responsibility for the diagnosis, specification and performance of the “substantial remedial work” they deem necessary, it is inevitable that some insulation providers will simply use their qualification to legitimise incomplete, unnecessary or inappropriate building repair work.
5. At present it seems that insulation companies are incentivised to detect low cost, short duration remedies for what can be complex, hard to treat damp problems.
6. The wider effects of applying energy saving measures to buildings that are by definition “hard to treat” are not being considered. We are seeing a growing number of condensation, damp penetration and fungal decay problems in buildings that are the direct result of poorly designed and installed roof and cavity wall insulation. The measures set out in the consultation will do nothing to reverse this trend.

The PCA and our members specialise in the diagnosis investigation and remediation of all forms of defect that results in dampness in buildings. We would be very happy to engage with you and provide advice, assistance and information that could lead to homeowners being treated fairly, will ensure money is not wasted and that buildings are improved and not damaged!

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