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Mr W Broad
Ofgem
9 Millbank
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Greater London
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23rd September 2013

Dear Mr Broad

Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities

The following is the response from the Residential Property Surveyors Association (RPSA) to the above consultation. RPSA is a trade body representing the interests of residential property surveyors across England and Wales who hold the Diploma in Home Inspection (DipHI) a qualification introduced under the last Government as part of QCF. Our members routinely undertake surveys of residential homes as well as perform the duties of energy assessors with the DEA qualification.

Seriatim:

“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.)”

If there are concerns as to the personal engagement of an appropriately qualified surveyor then the evidence collected should routinely include photographs of the site that is being inspected such as is routinely gathered by our surveyors in the conduct of a Home Condition Survey.

We would assert that those holding the DipHI would most certainly meet the definition of ‘a person with appropriate skills and experience’ and that they should be clearly identified as such in any revised requirements issued in respect of this scheme.

“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.”*

We do not understand why a closed shop has been introduced by Ofgem in respect of this report. Chartered Surveyors cover an extremely wide range of disciplines and whilst many may be members of the residential faculty of RICS, only a very small proportion routinely perform surveys of residential properties. Even fewer have any specific training in respect of energy efficiency assessment.

There is plenty of evidence that Chartered Surveyors are not visiting properties as part of the routine function of issuing a report, which of course should be a non-optional part of the job.

Our members are all trained in energy assessment, undertake residential property surveys on a daily basis and are entirely competent to produce these reports, which again should contain photographic evidence of the property in question.

We should be grateful for the addition of members of RPSA holding the DipHI being added as recognised to produce these reports.

“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.”

Once again we propose that members of RPSA holding the DipHI should be recognised as suitably qualified third parties to carry out technical monitoring.

I hope the above proves useful in your consideration of how to move forward with HTTC measures.

Yours Sincerely

Alan Milstein
Chairman