

# CIGA Consultation response to questions

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## 1. New CERO primary measures: Minimum insulation level to support a secondary measure

### Cavity wall insulation

1a) Do you agree that insulation of a cavity wall must be installed to at least 50% of the total exterior facing wall area of the premises in order to support a secondary measure?

*We believe that conforming the minima to the existing level applied to HTTC is a sensible approach.*

1b) Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold).

*The incremental cost versus Carbon benefit from maximising the area treated would mean that if 50% was mandated then in practice all practicable areas would be treated whilst allowing some flexibility where access issues etc. precluded installation.*

### Roof-space insulation

1c) Do you agree that roof-space insulation must be installed to at least 50% of the total roof-space area of the premises in order to support a secondary measure?

*No Comment.*

1d) Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold).

*No Comment.*

## 2. Connections to a district heating system: Pre-conditions for the premises under CERO and CSCO

2a) Do you agree with the reasons we are proposing for judging why any of the roof-space or exterior-facing wall area cannot be insulated?

*We believe that these are generally sensible but per para 2.11 of the consultation it should be clarified that cost, including access costs, are not a legitimate reason why a wall area cannot be insulated. We would also have concerns about how refusal of landlords consent could be evidenced, and the broad basis on which it is suggested this might be legitimately withheld, such as relocation of white goods.*

2b) Are there any other scenarios where the exterior-facing wall area of a premises being connected to a DHS cannot be insulated?

*Other reasons might include i) an unsuitable construction for which no products had been approved or no Guarantees were available or ii) Pre-existing defects that it was not possible to rectify.*

2c) How can suppliers demonstrate for compliance purposes that the exterior-facing wall area cannot be insulated?

*Building on established admin procedures we would suggest a Chartered Surveyors or Structural Engineers report.*

2d) Are there any other scenarios where the roof-space area of a premises being connected to a DHS cannot be insulated?

*No Comment.*

2e) How can suppliers demonstrate for compliance purposes that the roof-space area cannot be insulated?

*No Comment.*

2f) Are there any additional factors that can affect the decision on whether or not to insulate a premises?

*No Comment.*

**For premises, not including those within a multi-storey building which is not located on the top floor**

2g) Do you agree that, where the roof-space area or total exterior-facing wall area of the premises are insulated to less than 100% but more than a specified minimum level, a DHS connection should be eligible where the remaining area *cannot be insulated*?

*Yes, as with the criteria for primary measures we believe that it is sensible to conform the minima to that applicable to the eligibility of primary measures.*

2h) Do you agree that this minimum level should be set at 50%?

*We feel that 50% provides the necessary flexibility and as with primary measure eligibility cost benefit considerations will ensure that the maximum practicable area is insulated.*

### **3. Compliance with Building Regulations: Installation of a measure**

3a) Do you agree with our proposal to require evidence that the installation of a measure complies with Building Regulations? Please give reasons for your answer.

*Yes, although this should be proportionate to the risk, and reflect differences in regulatory requirements in the devolved administrations.*

3b) If this requirement was introduced, how could compliance be demonstrated?

*The proposal to require property specific evidence could add significantly to the complexity and costs of demonstrating compliance. Therefore for England and Wales we would favour approach based on evidence that work was undertaken by a member of a competent persons schemes, such as CWISC in the case of CWI. In the case of Scotland, where fitment of CWI is not notifiable, or for measures where a competent persons scheme is not available, then*

*evidence that the System used was technically approved for that construction, such as a BBA Agreement certificate, and that the installation was completed according to the technical approvals and PAS 2030 would provide the necessary evidence.*

3c) Are you aware of any other means of evidencing compliance with building regulations other than those listed (for either the installation or the product and system, or both)? If so, please provide details.

*As under version 1.1a we would favour an approach that could be based on evidence that work was undertaken by a contractor who was a member of a relevant competent persons scheme (CPS), such as CWISC in the case of CWI. We believe that the independent assessment of CPS schemes by UKAS would provide a higher level of assurance than the alternatives and would be analogous to the controls on the requirement for contractors to operate to PAS2030.*

3d) Do you think we should introduce this requirement from the date version 1.2 of the guidance takes effect or for the next ECO obligation period (2015-2017)? Please give reasons for your answer.

*We believe that it important that the revision of the guidance is used as an opportunity to simplify administration rather than complicate and add costs. Therefore introduce at a later point once the proposed alternative of basing compliance on evidence that the contractor was covered under a competent persons scheme can be evaluated.*

#### **4. General comments on our guidance (version 1.2)**

4a) Please provide any further comments on the changes to our DRAFT guidance document (version 1.2).

- *Generally we welcome confirmation that suppliers do not need to hold all evidence but can procure that Installers hold this.*
- *Under 4.63 covering eligibility of district heating it is not clear how the existence of wall insulation can be demonstrated without a disruptive investigation potentially causing disturbance and invalidating any Guarantees. Therefore one alternative would be to require confirmation that a CIGA or alternative/relevant Guarantee exists for the property.*
- *Whilst HTT and Standard cavities are now classified as a single primary measure, it needs to be recognised that where a HTT cavity is treated additional safeguards and technical requirements may apply. However, the version 1.1a requirement for a Chartered Surveyors report for HTT cavities was intended to ensure that they were correctly classified, and will not provide this assurance. Therefore it is not clear why in Annexe 1 a CS report is still specified for HTT measures, although HTT cavities should continue to be covered by an appropriate Guarantee for that category which would ensure that that necessary checks have been carried out and that a product technically approved for the application was installed.*
- *With regards to levelisation para 14.1 b) suggests that this will only be finalised by 30<sup>th</sup> September 2015. This seems unreasonable as the data should be readily available and should this be 2014?*