

Dear sir or madam

Please consider my response to the consultation request.

For your information I am an industry participant.

#### Question 1

Insulation of a cavity wall

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?

**No.**

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

***This provision is ill considered, insulation is frequently not viable, and certification against this provision complicates the operation of the scheme. In fact replacement heating appliances can achieve significant reductions in emissions comparable to insulation improvements, they also have safety advantages for occupants and provide improvements in the general wellbeing of the occupants. This condition is wrong minded.***

***It is wrong to promote one method of emissions reduction to the exclusion of everything else. It is ill considered and detrimental to other sectors, safety of vulnerable groups. It adds needless complication to the schemes administration.***

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**

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

***There is clearly an over prescription here, typically the roof space will be insulated or it will not, prescribing a 50% provision is both subjective, unmanageable and needlessly complicated.***

***The scheme objective is emissions reductions, prescribing a method in a scheme is not beneficial to the objectives, and does not provide any synergy with other necessary objectives such as safety, reliability of heating.***

#### Question 2

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?

**No, the reasons proposed have been generated by people who have little practical understanding of how this will operate in practice, it is too complex and does not have a clear advantage for the scheme objectives.**

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

**Connection to a DHS is likely to create significant aesthetic problems for the building, the pipes will be insulated, vulnerable and obtrusive in many cases.**

**DHS need to be considered only when suitable waste heat is available, most of the UKs housing stock is unsuitable for DHS, and its inclusion in this scheme is a needless complication.**

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

**Remove the prescription to insulate and the compliance criteria, it is not manageable, and fraught with scope for non-compliance.**

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

**Many roof spaces cannot be insulated, because of use, design etc, prescribing this criteria as a contingency on DHS is unnecessary.**

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

**Suppliers should be judged on aggregate performance and should be entitled to and required to exercise their professional engineering judgment.**

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

**Yes, there will be factors, and these should be at the digression of the industries engineers.**

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**

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

**no**

**Question 3:**

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.

**No**

***If the scheme is concerned building safety first, then the focus of the scheme would be on appliances first, not insulation.***

***Building regulations are under the administration of local Authorities not the administration body for this scheme, expecting evidence of compliance is of no concern to the scheme.***

***Most of the work when it is covered by Building regulations is self certified, and additional insulation is not covered, only for new construction would it be applicable.***

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

***It is demonstrated to the local council building control body, the scheme has no business with this activity.***

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.

***The requirement to comply with building regulations is universal, the local council may certify practices in their district as being acceptable.***

***The simplest way is for the Government to issue a circular removing the scope of this scheme from building regulations.***

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.

***Do not introduce this requirement.***

#### **Question 4:**

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

*This scheme is based on activity prescriptions, not on output deliverables.*

*It would be far better, to have the industry propose a scheme, with objective measurable targets rather than prescribe activities and criteria against which an output objective might be achieved.*

*If an obligation is made on the industry and a method prescribed as how to achieve it then when the objective fails the fault for the failure will be with the party that prescribed the method, not with the party striving for the objective.*

*Objectives and measurable outputs are needed, not methods. The industry should be given objectives, measurable outputs and then be asked for its method for achieving them. If it has agreed the objectives and measurable outputs and proposed the method, then the industry can be held to account, if the method is prescribed as this is doing, expect failure.*

Peter Knowles

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