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To: eco consultation
Cc: Adrian Pargeter
Subject: Deemed Scores - consultation

For and on behalf of Kingspan Insulation Ltd:

Our general thinking is that simplicity could be good, but that it shouldn't happen at the expense of proper consideration of the needs of an individual building and without considering product differentiation; this could lead towards poorer solutions, rather than appropriate, considered ones.

Our primary comments relate to Question 9.

Calculating a U-value should have a requirement that it be undertaken by a competent person (e.g. the BBA/TIMSA U-value and condensation risk competency scheme).

Just using the thickness of insulation doesn't consider the performance of different products; there can be a world of difference between the possible insulation performance and therefore the thickness needed to hit a given U-value. The methodology document (section 2.4.1) gives various U-values associated with thicknesses of insulation for solid wall insulation, which are based on presumably a poorly performing insulant and the resulting post-installation U-values are very poor when you consider that around 60mm of Kingspan External Wall Insulation on a poorer performing existing wall will get around 0.30W/m²K in reality (and with our new low lambda products, performance can be better 0.30W/m²K with Internal Wall Insulation, depending on the overall construction).

The deemed scores, Post installation, are also a bit limited in scope (there should be an option post installation for solid walls of 0.30W/m²K (the target in L1B), rather than just a jump in the options between 0.35W/m²K and 0.25W/m²K).

Overall, the after / end, or post installation values appear to be lacking in aspiration for SWI and for a number of other construction types too (e.g. park homes). The building regulations approved documents set minimum performance levels for improvement works and many of the tables of deemed scores exceed these levels.

Otherwise, for the remainder of questions, we do not have strong views. The energy companies are no doubt keen on this type of approach, we feel that it may have limitations as regards appropriateness of a given measure for a specific building, but benefits in simplicity.

Best regards,

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