

Good Afternoon,

Can I please take a minute or two of your time in reading this correspondence.

I own and manage a SME business that specialises in domestic energy assessments predominantly in relation to the energy company obligation. We employ over 30 qualified domestic energy assessors throughout the UK and manage energy assessments for some of the largest local authorities and registered social landlords in the UK.

Following the consultation being released on ECO3 recently, both myself and a number of our social housing clients have a number of areas we would like to raise. I feel our first hand, day to day experience may given BEIS and Ofgem a more realistic approach on the reality of fuel poverty to social housing tenants.

My first concern for future delivery is the termination of CERO. Whilst, I fully agree the focus of ECO is fuel poverty, I know from current experience that this is going to have a huge effect on social housing tenants living in genuine poverty. As it stands, the affordable warmth route to qualify is via the SAP rating falling into the low bands of E-G. Whilst this is realistic in non-traditional and off gas properties, it reduces the amount of cavity built properties that will qualify via this route in fuel deprivation.

For example,

A typical 1980s built property with no cavity wall insulation and >100mm of loft insulation will have an EPC made up of numerous assumptions from the build age bands set within the conventions of RdSAP. Commonly a DEA that has no purpose to perform a more intrusive survey in relation to ECO will use these assumptions for their benefit, which ultimately does not give a true reflection and a SAP rating that would not qualify via this route. Fortunately, my company has the resource to complete a more thorough EPC including a u value that represents the true wall construction. However, the reality is a lot of other contractors and/or utilities do not have this resource and infrastructure to go down this often complicated and unnecessary route. It also apparent from our own experience that a lot of social housing providers do not have EPCs on a high percentage of their assets and often use different methods such as KGI systems to give an overall average SAP rating to their assets.

Another concern from hands on experience is the variation and conditions of individual properties within social housing, which often isn't the fault of the tenant. For example, a block of flats can have a variation of units all with different SAP ratings. Some may qualify via the E-G route and others may be above this in C-D. As we are in the currently obligation, the existing element of CERO allows these blocks to be completed as whole. Under the new obligation, these blocks will not be viable as individual units cannot be completed leaving the tenants in fuel poverty. Another example may be where an end terrace property will qualify due to its size and the mid terraced adjoining may not, even though both residents are living in fuel poverty.

My suggestion would be to consider an E-G SAP minimum for Solid wall insulation installs and a reduction to **D-G for softer measures of cavity and loft insulation measures**. Alternatively, a method similar to CERT and CESP where the tenants' conditions are considered via the benefits route may also be an option. My experience in this field would suggest that the future consultation would be extremely difficult to deliver the obligation set for the social housing sector.

From hands on day to day experience, the targets set are not going to be achievable. To include a minimum E sap on a cavity wall built property in my opinion is not in line with the conventions set within RdSAP and the assumption and pre-set u values against a solid wall property which is more likely to achieve an E SAP.

I would like the opportunity to discuss my points with you in more detail and bring existing examples of where we have experienced such issues for you to consider.

At present, we are surveying over 300 social housing properties per week with a 60:40% CERO:HHCRO ratio.

Thank you for reading and I look forward to your response.

Kind Regards,



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