

Response ID ANON-9KBV-E9US-2

Submitted to Design of the Energy Company Obligation ECO+: 2023-2026
Submitted on 2022-12-22 20:05:34

About you

What is your name?

Name:
Fiona Newton

What is your email address?

Email:
consultations@ihbc.org.uk

What is your organisation?

Organisation:
Institute of Historic Building Conservation

Are you happy for your response to be published?

Yes

Would you like to be contacted when the consultation response is published?

Yes

How did you hear about this consultation?

Where did you hear of this consultation?:
Email from elsewhere

Other (please specify):

Chapter 1 questions

1 Do you agree with the proposal to set mandatory annual targets for ECO+?

Please add your response here:

2 Do you agree with the approach set out to implementing mandatory annual targets for ECO+?

Please add your response here:

3 Do you agree with our proposal to facilitate early delivery under ECO+ ahead of the ECO+ Order coming into force?

Please add your response here:

4 What additional information would suppliers need to deliver ECO+ measures before the ECO+ Order comes into force?

Please add your response here:

5 Do you agree with our proposal to allow each supplier a maximum of 10% carry-under of the Year 1 obligation to Year 2 for ECO+?

Please add your response here:

6 Do you agree with our proposal to allow unlimited carry-over between annual targets for each of the first two years of ECO+?

Please add your response here:

7 Search costs: Do you agree with our assumed search costs, as outlined in Table 2? Please provide BEIS with information on search costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :
No file uploaded

8 Search costs across the two eligibility groups: Do you agree with our plans to use lower search costs for the general eligibility group in the final ECO+ modelling compared to the low-income group? If so, by how much should we reduce search costs in the general group? Please provide BEIS with information on search costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

9 Reducing search costs generally across the scheme: Do you have any ideas on how search costs could be reduced across the scheme? Please provide BEIS with information on search costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

10 Measure cost assumptions: Do you agree with our estimates for the capital costs of installing measures, as outlined in Table 3? Please provide BEIS with information on measure costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

11 Measure cost assumptions: Do you agree with our estimates for the average installation costs of installing cavity wall and loft insulation, as outlined in Table 4? Please provide BEIS with information on measure costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

12 Additional costs of compliance with retrofit standards: Do you agree with our assumptions for compliance with TrustMark and PAS2035 standards? Please provide BEIS with any information on PAS2035 compliance costs by measure type and risk pathway for the following insulation measures: cavity wall, solid wall, loft, pitched roof, flat roof, under-floor, solid floor, park home and room in roof. If not available, please provide information on average PAS2035 compliance costs for these measures across all risk pathways.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

13 Supplier administration costs: Are you expecting administrative costs under ECO+ to be lower than under ECO3, given that a lot of the requirements under ECO+ are the same as under ECO4? Please provide BEIS with information on administrative costs supporting your response.

Please add your response here:

Please attach any material here (e.g., spreadsheets with search costs) :

No file uploaded

Chapter 2 questions

14 Do you agree ECO+ should target two groups with the first focusing on a general group with wider eligibility requirements and the second focusing on low-income households in line with ECO4?

Please add your response here:

15 Do you agree with our proposal to target "general group" support at households in Council Tax bands A-D in England, A-E in Scotland and A-C in Wales with an EPC of D and below?

Please add your response here:

16 Do you agree with our proposal to target all eligible low-income households living in EPC band D-G through the low-income group?

Please add your response here:

17 Do you agree with our proposal to carry over the same eligible benefits from ECO4 to the low-income group under ECO+?

Please add your response here:

18 Do you agree with our proposal to set a low-income group minimum requirement equivalent to 20% of each annual target with flexibility on whether the remaining obligation is delivered to low-income or general group households?

Please add your response here:

19 Do you agree that we should allow up to 80% of a supplier's low-income minimum requirement to be met through LA and Supplier Flex, with unlimited flex permitted beyond the low-income minimum requirement?

Please add your response here:

20 How can referrals through LA and Supplier Flex be facilitated?

Please add your response here:

21 Do you agree with our proposal that only PRS households in EPC bands D and E should be eligible for ECO+ in the general and low-income group, while PRS households in EPC bands F and G should be excluded, other than when exempt from the minimum energy efficiency standard?

Please add your response here:

22 Do you agree PRS households should not be eligible for secondary heating controls?

Please add your response here:

23 Do you agree with our proposal that PRS households in the general group should not be eligible for cavity and loft insulation?

Please add your response here:

24 Do you agree with our proposal that social housing will be included for EPC bands E-G in line with the eligibility criteria for general and low-income eligibility groups?

Please add your response here:

25 Do you agree that social housing should not receive heating controls through ECO+?

Please add your response here:

26 Do you agree social housing in the general and low-income eligibility group with EPC band D should only be eligible for the Innovation Measures that are eligible through ECO4?

Please add your response here:

27 Do you agree with only having a 'rural' rather than 'rural and off-gas' requirement for properties to receive an uplift in ECO+?

Please add your response here:

28 Do you agree that rural uplifts of 35% should apply in Scotland and Wales only?

Please add your response here:

29 Should the rural uplift only apply to higher-cost measures, and therefore exclude loft insulation and heating controls, delivered in Scotland and Wales through ECO+?

Please add your response here:

30 Do you agree that ECO+ should allow the in-fill mechanism with a ratio of 1:1 for flats and 1:3 for houses?

Please add your response here:

31 Do you agree we should allow ECO4 houses to contribute to the ECO+ in-fill ratio? Do you foresee any further challenges in blending ECO4 and ECO+ in this area?

Please add your response here:

32 Do you agree with our plans to explore additional access routes to the scheme, including through GOV.UK?

Please add your response here:

33 Do you have any views or ideas for how best this might be made to work to overcome noted obstacles?

Please add your response here:

34 Do you agree with our approach towards blending of funding with ECO+?

Please add your response here:

35 Are there additional issues you wish to flag about the interactions between ECO4 and ECO+ and/or with other grant schemes?

Please add your response here:

36 Do you agree with our proposal to target the low-income group at eligible households in EPC bands E, F and G that cannot meet the ECO4 minimum requirement?

Please add your response here:

37 Do you agree with our preferred approach to use the ECO4 exemption criteria to evidence whether a property within the low-income group with a starting EPC band of E, F or G cannot meet the ECO4 MR and is thus better suited to receive measures under ECO+?

Please add your response here:

38 Do you agree with our alternative proposal to use the pre-retrofit property assessment and further documentation to determine whether a band E, F or G property cannot meet the ECO4 minimum requirement and is therefore better suited to receive measures under ECO+? How could this test be made more robust?

Please add your response here:

39 Do you agree with our proposal not to include further tests to distinguish properties which may also be eligible under the HUG, LAD and SHDF schemes?

Please add your response here:

40 Do you agree with our proposal to exclude E, F or G properties that have received support under ECO+ from receiving further support under ECO4?

Please add your response here:

41 Do you have views or information on how the proposals set out in this consultation will impact people with protected characteristics under the Equality Act 2010?

Please add your response here:

Chapter 3 questions

42 Do you agree that there should be no minimum requirement for homes to be improved by a certain number of EPC bands in ECO+?

Please add your response here:

43 Do you agree with the list of eligible insulation measures permitted through the scheme subject to household eligibility rules? Are there any insulation measures missing from the list of eligible measures?

Please add your response here:

Yes. However, on the basis that the grid should be decarbonised well before 2050, a risk based approach is more appropriate as it will reduce risks. This is especially the case with traditionally constructed buildings, as stated in PAS2035

44 Do you agree with our proposal to offer only single insulation measures to both eligibility groups?

Please add your response here:

No as this will pose risks to the building and to the health of occupants. A whole house approach reduces risks of detrimental unintended consequences. These risks are damp, mould and condensation caused by inconsistencies in the performance of different parts of the thermal envelope. The suggestion that in a building with both cavity walls and solid walls, only one measure would be funded could lead to only one of those measures being installed. Fabric retrofit is risky and needs to be designed properly on a whole house basis.

45 Do you agree that homes should only be eligible to receive ECO+ support once through the scheme, to ensure that the maximum number of homes are able to receive support?

Please add your response here:

46 Do you agree with our proposal to encourage customer contributions to allow the delivery of higher-cost insulation measures through the general eligibility group?

Please add your response here:

47 Do you agree with a 10% spend increase (£80 million over three years) for the general eligibility group in the modelling to account for customer contributions in the overall scheme target?

Please add your response here:

48 Do you agree with the measures eligible to be installed under the heating control measure type?

Please add your response here:

We support that heating controls should come under the scheme, but the building regulation standards are inadequate. If the government wants householders to properly control heat then add-on heating controls, such as Time and Temperature Zone Control, Weather Compensation Controls, and Smart Heating Controls should be part of the package, otherwise the impact will be minimal.

49 Are there any other heating control measures that should be included?

Please add your response here:

50 Do you agree with our proposal to allow Innovation Measures approved under ECO4 to be installed under ECO+?

Please add your response here:

51 Do you agree that delivery of ECO4 innovations should be capped at no more than 10% of a supplier's annual obligation?

Please add your response here:

52 Do you agree with our proposal to encourage the delivery of Innovation Measures, that are awarded a 25% uplift as in ECO4, but not to retain a 45% uplift?

Please add your response here:

53 Do you agree that any ECO+ eligible Innovation Measure that is awarded a 45% uplift in ECO4 should be awarded a 25% uplift in ECO+?

Please add your response here:

54 Do you agree the sponsoring supplier uplift of 5% should not be retained under ECO+?

Please add your response here:

Chapter 4 questions

55 Do you agree with our proposal to adopt the ECO4 overarching scoring framework, for measures delivered under ECO+ to receive ECO4 partial project scores without the 20% deflator?

Please add your response here:

56 Where single insulation measures are installed, should we remove the 10% score correction deflator used in ECO4 to account for measure interaction? Please include views on whether the correction factor should be applied to heating controls installed as secondary measures.

Please add your response here:

57 Do you agree to our approach for evidencing scores under ECO+?

Please add your response here:

Chapter 5 questions

58 With the planned inclusion of ECO+ in the Energy Price Guarantee (EPG) mechanism, are there any particular issues or concerns that you would highlight?

Please add your response here:

59 Do you agree with our proposed notification processes for ECO+ measures?

Please add your response here:

60 Do you agree to our proposal for an extension to notification at the start of the ECO+ scheme?

Please add your response here:

61 Do you agree with our proposal not to impose any installation time limits on single ECO+ measures, but to require secondary heating controls to be installed within 3 months from the completed installation of the primary measure?

Please add your response here:

62 Do you agree with our proposal to allow trading of obligations within a six-month period at the start of each annual target period?

Please add your response here:

63 Do you agree with our proposal to allow the transfer of qualifying measures at any time before 31 March 2026?

Please add your response here:

Chapter 6 questions

64 Do you agree with our proposal to impose ECO+ guarantee requirements through TrustMark registration?

Please add your response here:

We agree with TrustMark registration, but flexibility is needed where traditional buildings are concerned. Nearly all suitable insulation materials for traditional buildings do not offer guarantees. Materials that do have guarantees are, on the whole, not suitable for traditional buildings and carry risks for the building and its healthy occupancy. Material used for wall insulation in traditional buildings should be genuinely vapour permeable. This is not simply for the future conservation of the buildings but for the health and wellbeing of the occupants. Retrofit installers often use non -vapour permeable materials (Celotex/Kingspan etc) with the detrimental consequences of black mould, wood rot, and asthmatic conditions in the occupants. Retrofit installers and assessors need training and knowledge in the construction of traditional buildings and the materials which are suitable for use.

65 Do you agree that we should require measure lifetimes through the scheme to benchmark guarantee requirements and for scheme reporting purposes?

Please add your response here:

66 Do you think we should allow loft insulation in low-risk situations and heating controls to be delivered in accordance with the TrustMark Licence Plus scheme rather than PAS2030/2035?

Please add your response here:

No because unless the whole building has been assessed, one will not understand the risks. Many so called low risk loft insulation installations has led to the deterioration of roof structures because it reduced ventilation. The whole house approach considers the impact that measures have on each other which is an essential

67 How can we determine a measure as low-risk without incurring additional costs through, for example, using a Retrofit Assessor or other PAS processes?

Please add your response here:

Working to PAS 2035

68 Do you agree all other insulation measures should be required to be installed in accordance with PAS2030/2035?

Please add your response here:

Yes

69 Do you think we should allow cavity wall insulation to be delivered in accordance with the TrustMark Licence Plus Scheme in low-risk situations?

Please add your response here:

No. Cavity wall insulation is categorically not low risk and there are many examples that illustrate the problems with this. Even in locations such as weather exposure zone one, thermal bridging risks may result in mould and condensation. Without considering the whole building the interaction with other measures will not be assessed and again the result is thermal bridging risks. Cavity wall insulation is often problematic because it is hidden and when the building changes ownership the source of any problem is not obvious. Again the type of materials used for insulation is key. They must be capable of transmitting water vapour from the inside to be emitted to the outside.

70 What else can we do to ensure sufficient supply chain capacity in support of ECO+, other retrofit schemes that will be running at the same time (ECO4, the Homes Upgrade Grant (HUG) and the Social Housing Decarbonisation Fund (SHDF)) and, in the long-term, our net zero target? What can we do to reduce competition between these schemes for the supply chain?

Please add your response here:

Overall take a long-term approach so as to provide supply chains the confidence to invest -this ranges from companies to individuals.

71 Do you agree with our proposal that advice should be provided on the benefits of smart meters and how to request installation of a smart meter alongside the advice provided under TrustMark Licence Plus and the energy advice requirements required by PAS2035 (as relevant)?

Please add your response here:

Yes under PAS 2035 only

Chapter 7 questions

72 Do you have any views on the proposal for ECO+ to follow the approach of the existing ECO programme, in supporting consumers in all parts of Great Britain?

Please add your response here:

73 Do you have views on how the scheme can best support consumers in Scotland, for those aspects that were transferred to Scottish ministers by the Scotland Act 2016?

Please add your response here:

Chapter 8 questions

74 Do you agree with our proposal on amending the definition of renewable heating system?

Please add your response here:

75 Do you agree with our proposal to allow homes with neither an efficient nor inefficient heating system to be eligible for electric storage heaters and electric heating systems, and for these off-gas homes where it is not possible to install measures from the off-gas heating hierarchy?

Please add your response here:

76 Do you agree with our proposal to allow homes with a broken central heating system or connection to a district heating system fuelled by oil, LPG or biofuel or a broken renewable heating system which is an inefficient heating system, where it is not possible to install a heating measure from the off-gas heating hierarchy and a repair is not technically feasible to be eligible for electric storage heaters and electric heating systems?

Please add your response here:

77 Do you agree with our proposal to allow connections to district heating systems fuelled wholly or partly by gas to be installed in off-gas homes?

Please add your response here:

78 Do you agree with our proposal to update the ECO4 partial project scores from SAP2012 to SAP10?

Please add your response here:

79 Do you agree with our proposal to require SAP10 and RdSAP10 assessments for ECO4 evidencing instead of SAP2012 and RdSAP2012?

Please add your response here:

80 Do you agree with our proposal to restrict exemptions to the minimum requirement and minimum insulation requirement that are evidenced by PAS2035 to only those retrofits in scope of PAS2035?

Please add your response here: