

Response ID ANON-CN28-FSHZ-P

Submitted to Boiler Upgrade Scheme Regulations
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About you

What is your name?

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What is your organisation?

Organisation:
N/A

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:

Other (please specify):

The consultation questions

1 Do you agree with the proposal to allow for the potential differentiation of the grant levels for different types of property or property owner within the regulations? Please provide evidence to support your response.

Yes

Please provide supporting evidence here:

2 Should we maintain the current requirement for a valid EPC with no outstanding recommendations for loft or cavity wall insulation? Yes/No. Please provide evidence to support your response.

No

Please provide supporting evidence here:

It is becoming more evident that we need to logistically decouple fabric works from heat-pump retrofits. This both enables freedom in timing of works and freedom to retrofit where (for example) conservation area and funding constraints may inhibit fabric changes. Retrofitting a heat pump has the capacity to eliminate local carbon emissions and reduce UK emissions substantially even if 'ideal' fabric changes are not made.

See: <https://www.gov.uk/government/publications/cost-optimal-domestic-electrification-code> - "Decarbonised electricity offers the promise of very low or even zero-carbon heating for homes – without necessarily carrying out extensive deep retrofit work." and "The work focused on total costs of ownership over 15 years. For most house types and most electric heating systems, the cost-optimal packages of measures have very limited fabric improvements – most commonly just draught-sealing and top-up loft insulation."

3 If you consider the EPC requirements to be a barrier to uptake, what specifically do you consider to be the issue:

Requirement to have a valid EPC

Please provide supporting evidence here:

Again the perfect (all possible/reasonable fabric improvements complete) should not be the enemy of the good carbon reductions from a heat pump.

It is good to have some measure (with an EPC) in order to better manage, and an EPC is cheap and easy to obtain.

4 If we retain the EPC requirements, are there any potential changes we could make to ease the consumer journey without risking heat pumps being installed in unsuitable properties? For example, allowing the submission of an expired EPC with no recommendations for loft or

cavity wall insulation.

Provide answer here:

According to the 2022 Energy Systems Catapult "Electrification of Heat: Home Surveys and Install Report": "Only 12% of properties surveyed were considered unfeasible based on technical constraints."

<https://es.catapult.org.uk/report/electrification-of-heat-home-surveys-and-install-report/>

Gating via presence of a current EPC is a very crude and likely unhelpful measure of "unsuitable". Having a current EPC is likely useful, but the detailed calculations, eg via MCS standards, prior to a potential installation is a much better measure of "unsuitable".

Note that some of the 12% above were constraints such as physical space and electricity supply, for which an EPC provides little or no selective value.

5 Should we allow biomass boilers with a cooking function provided the cooking function is integrated and cannot be controlled separately to the heating function of the property? Please provide evidence to support your response.

No

Please provide supporting evidence here:

Unless very well managed boilers with flue particulate (etc) monitoring, in rural (low population density) areas with very local biomass sources.