

STBA Response: Department for Energy Security and Net Zero - Energy Company Obligation 4 (ECO4) and the Great British Insulation Scheme (GBIS) Consultation

Section	Comment
13. Considering the details set out in this consultation and by TrustMark, do you agree with the proposal to introduce the version of TMLP for use in GBIS for loft insulation when delivered as a single measure (and heating controls when paired with loft insulation)?	The STBA was an early proponent of the ‘whole-house approach’, arguing that single-measure interventions are inherently risky and that any planned interventions need to be considered holistically to the building fabric, its services, and occupants. While the addition of heating controls seemingly add very little risk, and loft insulation adds some moisture risk, the STBA is concerned in principle about the move away from a whole-house approach. This proposal, while currently limited, could set a dangerous precedent. Better to increase skills and competences in the sector to increase volumes, rather than lowering standards which is likely to have the effect of more low-quality and risky installations.
14. For the adapted version of TMLP, have sufficient risks been identified and addressed in Table 1?	There is a lack of definition for ‘heritage’ buildings throughout the document, and whether that means a designated heritage asset or a building of traditional material and construction typology. PAS-2035 treats ‘traditional and protected buildings’ as ‘heritage buildings’ and STBA recommends the same for this document should these changes go forward. Buildings of traditional construction are particularly prone to unintended consequences of measures designed to reduce heat loss and/or air leakage (see PAS-2035 Section 4.2.6), and while loft insulation is less of an issue than wall insulation, there are still risks.
17. Are there any other changes, not proposed in this consultation, that you believe would increase levels of delivery under GBIS?	Increase skills and competences of installers would have the best chance of increasing delivery levels while reducing risks of unintended consequences.
25. Do you think a Chartered Surveyor continues to be suitably equipped to conduct this assessment?	As long as they have suitable skills and competences for the relevant building typology.
70. Do you agree with our preference to require ECO4 retrofits to include at least one of CWI, SWI, RIRI, FRI and PRI? If not, why not?	Particular interventions should not be required ahead of assessments.