

**FINAL**



# **Consultation Response**

**Consultation on support for low  
carbon heating in residential  
buildings**

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## 1. Introduction

Elmhurst Energy are pleased that Northern Ireland Government are seeking a Consultation on 'Support for low carbon heating in residential buildings' and as such we are delighted to respond to each question in turn.

Key Summary points:

1. A Pre and Post EPC is essential for adopting a fabric first approach as well as allowing consumers to make informed choices when it comes to any improvements being made to their property. Data can also be used by the Government to analyse improvements and measure carbon savings. The additional service of an Energy Consultant should also be used, to allow for further advice to be given to both the homeowner and also the installer. They may be competent in completing heat loss calculations in order to accurately size a heat pump.
2. EPC reform is paramount, with Elmhurst's suggestion to show more than just a cost metric on the EPC. This allows for different metrics (cost, carbon and energy consumption) to be viewed depending on who is looking at it and for what purpose it is being used for.
3. The focus of this consultation must be on reducing carbon emissions and less emphasis on fuel poverty.

The Consultation asked 33 questions and we have answered them all below. We hope you find the responses considered and useful for taking 'Support for low carbon heating in residential buildings' forward in a progressive manner.

## 2. Questions and Answers

### **1. Do you agree with the criteria used to inform technology eligible for support? Yes/No? If you do not agree, please explain why you do not agree and provide evidence to support your answer.**

We strongly support the long-term goal of achieving net-zero emissions by 2050. We believe that low and zero-carbon heating solutions are essential to meeting this target, provided they are implemented as part of a 'fabric first' approach that prioritises building fabric improvements. In addition, it is crucial that consumers are well-informed about the costs, quality, and installation processes of these heating technologies to ensure they make informed decisions and receive the full benefits of these solutions.

### **2. Do you think that other criteria should be applied? Yes/No? Please provide evidence to support your answer.**

Yes, A valid EPC should be made available both before and after the installation of low and zero-carbon heating systems. This ensures transparency for homeowners, who can better understand the improvements made to their property's energy efficiency. Additionally, it allows the government to gather the necessary data to track the success of decarbonisation initiatives. EPC assessors are accredited, ensuring proper oversight and compliance with established standards. Importantly, a low EPC banding should not automatically disqualify homeowners from eligibility for funding. This should also go hand in hand with EPC reform and a review of the metrics shown on the EPC to allow for different measures to be used.

### **3. The department does not intend to provide financial support for biomass boilers, do you think there should be exceptions to this? Yes/No. Please give reasons for your answer.**

No strong opinion

### **4. The department does not intend to provide financial support for hybrid heat pumps, do you think there should be exceptions to this?**

No strong opinion

**5. Should a minimum Seasonal Co-efficient of Performance of at least 2.8 or higher be applied to the low carbon technologies considered for support? Please tick all that apply. Please give reasons for your answer**

- **Air Source Heat Pump**
- **Ground Source Heat Pump**
- **Water Source Heat Pump**

No strong opinion

**6. Should all domestic buildings be eligible for low carbon heating technology support? Yes/No. Please give reasons for your answer**

Yes, there should be no restrictions in place in order for the public to partake in this scheme.

**7. What minimum energy efficiency criteria in relation to domestic buildings should be met (if any) to make them suitable for a low carbon heating technology support?**

**Option A – No minimum energy efficiency requirements.**

**Option B – A valid EPC with no loft or wall insulation recommendations.**

**Option C – An energy assessment of the home conducted by a technical adviser.**

**Option D – A minimum standard of EPC rating.**

**Option E – Other method (please specify).**

**Please give reasons for your answer.**

Option E – other method.

There should be no minimum energy efficiency requirements for eligibility, as the focus should be on improving energy performance and reducing carbon emissions through appropriate measures. However, it is essential that a valid EPC be completed both before and after the installation. This provides the homeowner with clear visibility of the improvements made to their property's energy efficiency, with every home being different. It also gives the Government data to analyse and show progress.

The anticipated EPC reform consultation presents an important opportunity to address the growing need for EPCs to not only show a cost metric but also include a carbon rating. This additional metric would provide a more complete assessment of a property's environmental impact, offering homeowners a clearer understanding of how their energy use translates to carbon emissions.

Additionally, homeowners would greatly benefit from the services of a technical consultant, who would conduct a thorough assessment of the property and offer detailed recommendations based on their findings. The technical consultant would be highly competent, possibly equipped with the necessary expertise to use a heat loss calculator in line with BS 12831 and ensure that the heat pump being installed is appropriately sized for the property's specific needs.

- 8. If you selected Option C – do you think support should be available towards the costs associated with an energy assessment as part of support for the installation of the low carbon technology? Yes/No. Please give a reason for your answer**
- 9. Do you agree that support for low carbon heating technologies is provided separately for owner occupiers with alternative provision of support made for landlord, social housing, and non-domestic properties? Yes/No. Please give reasons for your answer.**

No - It is essential that the whole of Northern Ireland have access to the support and not one group is prioritised.

- 10. Do you agree that self-build properties should be eligible for support at this time? Yes/No. Please give reasons for your answer.**

Yes, as above answer for question nine.

- 11. Do you think additional financial support should be available to those homes in rural and island locations?**

- **Both – rural and island**
- **Rural only**
- **Island only**
- **Neither**

**Please provide reasons for your answer.**

Both – rural and island

Installation of these systems in rural/island settings may face additional costs due to factors such as a smaller, specialized workforce and potential supply chain

constraints. Limited availability of parts, along with increased travel and shipping costs for remote areas, may contribute to higher overall costs. These factors should be considered when evaluating the financial feasibility of such installations.

**12. If you answered yes to Question 11, how would homes be identified as rural by the department? Please provide reasons for your suggestion.**

A very simple approach should be used and maybe a property being off gas grid would be one suggestion or by the properties postcode.

**13. Do you agree that to be eligible for support, a new heating installation should replace fossil fuel heating, replace direct electric heating, or be installed where no central heating currently exists? Yes/No. Please give reasons for your answer.**

Yes, these would be appropriate reasons for support.

**14. Do you agree that replacing a low carbon heating system with another low carbon heating system should be ineligible for support? Yes/No. Please give reasons for your answer.**

Yes, we would agree if the result was to reduce running costs and carbon emissions. Without knowing the definition of 'low carbon heating system' it is difficult to say and each home will be different.

**15. Should households who have received energy efficiency support via schemes such as NISEP or Affordable Warmth be able to apply for additional low carbon heat support? Yes/No. Please give reasons for your answer.**

Yes, no restrictions should be in place to apply for additional support however there is a risk of intertwining whether we are looking at fuel poverty or reducing carbon emissions.

**16. Should support options be designed to prioritise or target certain groups of people (such as those on low incomes)? Yes/No**

**Please give reasons for your answer. If you answered Yes, please detail which groups should be targeted and how could this be achieved.**

As above answer for question 15.

**17. Should prioritisation or additional support be given to those with older (perhaps 15+ years) fossil fuel boilers? Yes/No. Please give reasons for your answer.**

Priority should be given to whatever system reduces carbon and less focus should be given to the systems age or cost.

**18. Should additional support be offered to the consumer where no central heating system is present in the home? Yes/No. Please give reasons for your answer.**

No strong opinion

**19. Should those with multiple occupied properties e.g. holiday homes be eligible to apply for support for more than one property? Yes/No. Please give reasons for your answer**

No strong opinion

**20. Do you agree that the department has a requirement for consumer protection measures to be associated with support for low carbon heating technology?**

Yes

Appropriate standards must be adhered to throughout both the design, installation and commissioning process and to ensure that all eligibility requirements for funding are met. This ensures that systems are installed correctly, efficiently, and in line with regulatory and performance expectations. The use of a competent person (such as an Elmhurst Energy Better buildings consultant) would be beneficial and gives the opportunity for homeowners to be empowered to make informed choices about the heating solutions they adopt. To facilitate this, it is essential that quality assurance processes are firmly in place. These processes should guarantee that both the



installation and the products themselves meet high-quality standards, giving homeowners confidence that their investment is sound and will deliver long-term energy and cost savings. The focus however needs to be on reducing carbon and less on cost.

## **21. What do you feel would be the best method of consumer protection?**

**Option A - Need for installers to be registered to a certification scheme such as MCS.**

**Option B - The department to set its own consumer protection requirements.**

**Option C – Other**

Option A

Installers should be registered to a certification scheme such as MCS. Pre and Post install an EPC should then be carried out by an accredited and regulated assessor. The use of a technical consultant would also be beneficial, for example an Elmhurst Energy Better building's consultant. This is someone that could potentially offer an additional service to help installers of heat pumps and give further advice regarding the information shown on the EPC.

**22. If it is required for installers to be accredited to a certification scheme in order to take part in any future government support, should funding be made available towards certification fees? Yes/No. Please give reasons and evidence to support your answer.**

No strong opinion

**23. Should any electrical work completed as part of the low carbon heating technology installation be required to be certified by an approved accredited body? Yes/No. Please give reasons and evidence to support your answer.**

No strong opinion

**24. Do you agree with the criteria for the administration of support for low carbon heating technologies? Yes/No. If no, please give reasons for your answer**

No strong opinion

**25. Do you agree with the approach to offer support by providing a one-off capital grant? Yes/No. If no, please give reasons for your answer**

No strong opinion

**26. Which option do you think should be the approach to the level of financial support for eligible technologies? Please tick one box only.**

**Option 1 – apply the same amount of funding for all eligible technologies.**

**Option 2 – apply different amounts of funding per eligible technology type.**

**Option 3 – other (please specify).**

**Please give reasons for your answer.**

No strong opinion

**27. Are there any cost barriers beyond the cost of the technology that you feel may impact on the successful rollout of low carbon heating technology support? Yes/No. Please give reasons for your answer.**

Yes, It is essential that there are enough skilled and competent people working within Northern Ireland. On-going maintenance costs also need to be considered post install.

**28. Do you have suggestions as to how the department can ensure financial support delivers the best possible value for money? Yes/No. Please give reasons for your answer.**

Yes, We strongly recommend that a pre and post installation EPC is carried out. This allows for the measure of carbon improvement to be recorded along with a cost analysis. A more in depth way of measuring and demonstrating improvements would

be to use in situ measurements such as Measured Energy Performance. Allowing a comparison of the true savings vs calculated assumptions in an energy model.

**29. Is the supply chain and manufacturing base in NI well established to cope with demand for installations of low carbon heating technologies if demand increases? Yes/No. Please give reasons for your answer.**

No strong opinion

**30. Is there any evidence of after-care delays with repairs and maintenance of heat pumps due to supply chain shortages and delays that may cause someone to be without heating? Yes/No. If yes, please provide evidence.**

No strong opinion

**31. How can growth of the skills base within the heat pump industry be supported by the private sector and government to complement any support for low carbon heating in**

**a) the short – medium term (up to 10 years) and**

**b) the long term (over 10 years)?**

**Please provide any evidence you may have.**

Elmhurst Energy has a competency scheme focused on heat loss calculation, which will play a crucial role in supporting installers to accurately size heat pumps for residential properties. This scheme will ensure that assessors providing advice to homeowners are fully competent and adhere to industry standards, guaranteeing that the advice given is both accurate and reliable. By ensuring assessors are qualified and compliant, the scheme will help consumers make informed decisions while providing assurance that the heat pump installation is correctly tailored to the property's needs, maximising its efficiency and performance. There should be no short/stop policies, consumers need a commitment in the long term in order for the private sector to invest.

**32. Is there an adequate amount of heat pump installers within NI to cope with demand for installations as well as aftercare and repairs/maintenance should demand for heat pumps increase in the short – medium term?**

**Yes/No**

**Please give reasons for your answer.**

No strong opinion

**33. What actions can be taken to support the scaling and growth of the low carbon industry, particularly installers, to meet future demand projections of heat pump deployment targets? Please give reasons for your answer.**

See answer to question 31.

## Contact Details

Should you require any further clarification, please contact us at:



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