



Elmhurst Energy's final response to:

Phasing out the installation of fossil fuel heating in homes off the gas grid

Prepared for: BEIS



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## Introduction

Elmhurst Energy are pleased that BEIS are consulting on "Phasing out the installation of fossil fuel heating in homes off the gas grid" and as such we are delighted to respond to each question in turn.

The consultation asked 17 questions and we have answered them all below. We hope you find the responses considered and useful for taking the phasing out of fossil fuels forward in a progressive manner.

## Executive Summary

In summary, we support this scheme that aims to incentivise and encourage the phasing out of fossil fuels in homes especially off the gas grid. As an accreditation company, we are open to measures which will lead to more sustainable homes by providing affordable solutions to the public to achieve these goals.

The key points throughout this consultation response are as follows:

- For properties to be considered for a heat pump, or other sustainable technology where this is not appropriate, an EPC should be issued first to measure these improvements and to recommend the most suitable solution.
- The fuel price of the heating system will need to be included in structure of EPC for public awareness. The price should be updated to include new technologies and heat pumps in the recommendations.
- The Retrofit (PAS203/2035) standards should be followed for this scheme to move forward. By using these registered standards, a fabric first approach system should be adopted before either a heat pump or other appropriate measures are installed.
- We support incentives being issued to install heat pumps or other appropriate measures and reducing barriers with Green levies to encourage and support the transition for the public.

## Questions and Answers

- 1. What evidence can you provide of low carbon heat technologies being taken up without government support? Do you agree with the principle of working with the natural boiler replacement cycle as the key trigger to deploy low carbon heat? Please provide evidence to support your response.**

Yes we do agree with the natural boiler replacement cycle, however we also encourage that the government incentivise a newer date with the help of grants. We strongly advise that the government provides the incentives for less efficient homes starting with the worse performing. The government need to be clear and concise on the lower cost and the efficiency. It would also be advisable that appropriate low carbon systems and technology should influence the incentive.

- 2. Would a 2026 end date for the installation of fossil fuel heating in homes off the gas grid give industry and consumers sufficient time to prepare for the regulations? Please provide evidence to support your response.**

We have no strong opinion on this exact date, however we would advise for this date to be as soon as practically possible for the start of this transition and would strongly encourage that the public are made aware of this change. Incentives and regulations made by the government, needs to be clearer to make this occur, regular and often. A stop-start policy will not incentivise the industry to ensure this happens. We suggest a carrot and stick approach to be the best way to ensure that home owners in off grid premises take action to improve their properties. It is important that the heat demand is reduced to the minimum before sizing and replacing the heat source; this is when grants and incentives will come into play to encourage the public to undergo this transition. Plans should be accelerated to mandate minimum energy standards in private rental and introduce plans for property sales and owner occupied properties, with penalties on council tax and stamp duty for poor performing dwellings.

**3. Do you agree with a heat pump first approach to replacement heating systems in fossil fuel heated homes off the gas grid that can reasonably practicably accommodate a heat pump? Please provide evidence to support your response.**

Elmhurst strongly suggest that a fabric first approach is adopted before the installation of a replacement heating system. This will mean the property will emit the least amount of carbon and costs less to run for the home owner. The appropriate measure to follow, before installing a heat pump, would be to base it on the energy assessment and work with DEAs to look into the practicality of the potential system installation. Before EPC measures can take effect, the EPC needs to be amended to recommend heat pumps and fuel type costings which we know the government are currently working on.

**4. Do you have any views on the design or content of guidance that will help households and installers determine whether it is reasonably practicable to install a heat pump? Please provide evidence to support your answer.**

We strongly believe that the EPC structure and inputs need to be modernised to include carbon rating and the recommendation of new technology/more efficient heating systems. We recognise the government are doing this and we also suggest that DEAs have a vital role in this moving forward. The online public register for EPCs, can provide further guidance for home owners to look at the quality installers and recommendations.

**5. Do you have any additional evidence on the size and characteristics of the cohort of homes off the gas grid that have the greatest deployment potential for ground source heat pumps?**

No strong opinion, however the characteristics of the property energy demand and matching it with other available data sources may help. We urgently need changes to the SAP/RdSAP methodology which needs to be updated to reflect recent developments in technology and update this methodology at least every three years to not suppress innovation.

- 6. Do you agree that the performance of replacement heating systems in homes off the gas grid that cannot reasonably practicably accommodate a heat pump should reflect the current high standards of performance that can be delivered through high temperature heat pumps and solid biomass systems? Please provide evidence to support your answer.**

As long as there was a robust system that would ensure the reasonable practicality was enforceable.

- 7. Do you agree that future use of solid biomass to decarbonise heat in homes off the gas grid should be limited to rural, off-gas grid areas where air quality can be better controlled, and in 'hard to treat' properties that are not suitable for other low carbon heating technologies? Please provide evidence to support your response.**

No strong opinion.

- 8. Do you have any views on the development of heating fuels and systems which will be consistent with wider government objectives on net zero emissions, environmental sustainability and air quality, and offer a secure and affordable fuel supply to consumers, from 2026? Please provide evidence to support your answer.**

We strongly advise that the methodology and the EPC are updated with all the technologies to be able to cope with these new developments and the EPC output is very clear depicting the energy rating, fuel cost and carbon emissions; aligning with the government policy.

- 9. Do you agree with an end date for the use of remaining fossil fuel heating in homes off the gas grid by the late-2030s? Please provide evidence to support your answer.**

Yes we do agree, however the government needs to provide grant incentives and regulations to incentivise the worse performing properties according to the EPCs, focusing on carbon, cost, and energy efficiency.

**10. Do you have any views on measures the government could introduce to ensure that fossil fuel heating will no longer be used in homes off the gas grid by the late-2030s? Please provide evidence to support your answer.**

We believe that incentives and regulations backing this scheme up with the methodology and having a consistent measure will aid in this transition. Those who do not follow this greener scheme should receive a charge as there is a responsibility for all to improve energy efficiency. The EPC data output should be utilised to pursue the target audience.

**11. Do you have any views on how best to ensure compliance with the proposed regulations laid out through this consultation? Please provide evidence to support your answer.**

The EPC should be built into the process of selling/ purchasing a property to look at less efficient homes. Special attention needs to be placed on any notifiable works that take place through competent person schemes around heating installations. Green levies should be removed to reduce costs for the installation.

**12. Do you have any views on what more could be done to address financial barriers to heat pump deployment? Please provide evidence to support your answer.**

To begin with, the dwelling will need to have an up to date whole building assessment in the form of an EPC to measure the efficiency level ensuring the national infrastructure heat program PAS2035 is used to follow a fabric first approach. The heat pump system and installation within itself, needs to be more financially available to tackle fuel poverty with the current price of electricity, this can be reduced by removing green levies. The cost of this deployment could also be reduced by offering grants for PV panels to be installed thus reducing the grid electricity and upfront cost.

**13. Do you have any views on how we should encourage smart-enabled heating in homes off the gas grid? Please provide evidence to support your answer.**

Moving towards smart technology is ideal but this measure needs to be proven to be more energy efficient. With the SAP methodology and the EPC data output, this analysis needs to be aware of asset calculation rather than occupancy calculation.

**14. Do you have any views on what more could be done to galvanise supply chains for low carbon heating? Please provide evidence to support your answer.**

The industry should go through PAS2030/35 ensuring the supply chain is using retrofit professionals to deliver whole house fabric first approach. If the government are serious then the industry will be galvanised behind this. As mentioned before, a stop-start approach will not work and long term measures should be in place. It is also worth mentioning that ideally the UK would be manufacturing heating systems, again aiding in more environmental measures.

**15. Do you have any additional evidence on how groups protected under the Public Sector Equality Duty may be affected by our proposals to phase out high-carbon fossil fuel heating in homes off the gas grid?**

No strong opinion.

**16. Do you have any views on what more could be done to ensure households, and communities, affected by our proposals experience a smooth transition to clean heat? Please provide evidence to support your answer.**

The PAS2035 standard should be used to ensure the transition of the installation of more efficient heating systems in replacement of fossil fuel heating systems. Clear guidance with incentives and regulations should be made well aware to the public.

**17. Do you have any further comments to make on our proposals to phase out high-carbon fossil fuel heating in homes off the gas grid? Please provide evidence to support your answer.**

The government needs to be clearer on the goals it is wanting to achieve; the use of the EPC will deliver carbon cost and energy calculations for every home. Building on PAS2035 standards will deliver the goal government are wanting to achieve.



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