Response to the NISEP consultation issued by the Energy Regulator from Tom Woolley of Rachel Bevan Architects
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We support the proposal to extend the NISEP programme for a further year until 30 March 2017, on the basis that it should continue to provide energy efficiency measures to those on low incomes and in fuel poverty.

We also support the current 80/20 split in funding though we believe a bigger contribution could be made by the non-domestic sector to the funding of NISEP. We do not support the diversion of NISEP funds to energy schemes in the non-domestic sector as all the resources should be directed to tackling fuel poverty, which remains a massive problem in Northern Ireland.

While the report refers to other energy efficiency schemes, we do not believe that any of these adequately meet current needs and we agree with the Consumer Council report Saving Energy 2013 that there are too many disparate grants without a single focus.

While we appreciate the benefits that have accrued from the NISEP scheme we believe that there is an urgent need to review the implementation of NISEP and to consider the most effective ways to deliver energy efficiency and other measures funded by the programme. The consultation document fails to give details of how NISEP is currently administered and applied in practice and we believe more information about this should be in the public domain.

The consultation document states that there have been a number of successful renewable schemes undertaken using NISEP funding but we have been unable to find any evidence that these schemes have been independently audited and believe that more information about these schemes should be in the public domain.

The consultation document refers to the **HEaT** programme but points out that there is very little detail yet in the public domain about these proposals. We are extremely concerned that considerable Government resources have been spent on the development of HEaT but nothing has been published as to the aims of the programme. The proposals, or even the principles of the scheme, have not been put to the ASSEMBLY, or the wider community. There is also a suggestion that local authorities may be involved in managing energy efficiency schemes and yet they have not been informed about the content of the proposals.

We believe there is currently no evidence at all, to suggest that Heat might deliver the benefits currently provided by NISEP.

The regulator should use her influence to call on OFMDFM to publish the HEaT proposals, without delay, so they can be examined by stakeholders and the public.

One of the failings of the process involved in developing HEaT is that consultation has been extremely limited and focused only on a small section of the construction and material supply industry. This may have given a commercial advantage to the limited audience involved so far. Also calls for an independent expert technical panel

to consider energy efficiency and retrofit plans for NI made both by MLAs in the NI assembly (13.11.13) and by independent professionals, have been entirely ignored.

We call on the regulator to support proposals to establish an independent expert technical panel to consider how future proposals could be developed with a single focus as proposed by the consumer council. Various groups have called for a Green Investment Deal and also that this could be linked to a research and development hub which can issue technical guidance to construction companies and installers, evaluate and monitor the success of schemes and promote best practice in retrofit solutions so that the mistakes, that have been made in England with the green deal and other retrofit measures, can be avoided in NI. It would also have the aim of ensuring that following good design practice and utilizing the best kind of insulation and other materials, which could be manufactured in NI, with the economic benefits that this will bring.

The independent panel and R&D hub could draw in expertise from both Universities and the Regional Colleges as well as industry and professional bodies such as CIH, NIFHA, Bryson Energy etc. and should consider measures taken under NISEP, NIHE, DSD, Housing Associations etc. etc. It would be an appropriate use of NISEP funds to establish such an initiative as it would help to ensure that further use of NISEP funds would be used in the most effective way possible. It should have an independent chair person.