

Reforms to the Energy Performance of Buildings Regime

Consultation Questions:

- 1. To what extent do you agree or disagree that information using an energy cost metric should be displayed on EPCs? Please select one option for each building type.**

Domestic buildings:

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning, and provide any evidence to support your view.

Use of an energy cost metric on EPCs would need to be clearly defined in respect of how it is calculated I.E based upon average use within a set temperature range 18-21 degrees Celsius. Otherwise, residents may believe there to be something wrong with the property or heating system if their costs are higher/lower than the EPC metric predicts, their understanding of how it's calculated is key. Also, if something is altered in the property which may impact this metric then the EPC would need to be renewed to reflect the change, and this may lead to increased costs to building owners to keep EPCs accurate.

Furthermore, unit rates for energy differ between regions and tariffs the indication of cost will be beneficial to occupiers or potential future occupiers. Consideration should be given to how commercial sensitivities and short-term shocks in the energy market are not allowed to distort cost presentation.

- 2. To what extent do you agree or disagree that information derived from a fabric performance metric should be displayed on EPCs? Please select one option for each building type.**

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

As more empirical evidence of fabric performance is developed this measure will improve the robustness of EPCs.

3. When evaluating the fabric performance of buildings, which methodology do you think should inform the basis of calculating a fabric metric? Please select one option for each building type.

Domestic buildings

No preference

Don't know

FEES

HLP/HTC

Other

Non-domestic buildings

No preference

Don't know

FEES

HLP/HTC

Other

If you wish, please explain your reasoning and provide any evidence to support your view.

4. To what extent do you agree or disagree that information based on a heating system metric should be displayed on EPCs ? Please select one option for each building type.

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

This metric will draw positive attention to heating sources and encourage the switch to more efficient and low-carbon heating systems.

Costs of installing heating systems needs to be factored in, as well the ability for the specific building to support installation of certain systems effectively I.E air source heat pump installation into a 40–50-year-old building may not be suitable unless you overhaul the entire heating system- pipes, radiators etc. together with the pump itself. It has to be economically viable for the building owner to install a system that an EPC recommends, otherwise you're punishing them with a metric which may negatively impact the property value or ability to let a property.

5. What are your views on the design principles and the scope for a Heating System metric? Please provide evidence where possible.

The metric could be developed in a similar format to the current energy ratings showing the energy efficiency of appliances and products.

This is easily understood by consumers and would be able to differentiate between efficiencies of similar heating types.

6. To what extent do you agree or disagree that information based on a smart readiness metric should be displayed on EPCs? Please select one option for each building type.

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Balancing grid demand will continue to be a significant national challenge. Evidence of increasing smart demand management across the grid could play a role in resilience planning.

7. What are your views on the definition, design principles and the scope for a smart readiness metric? Please provide evidence where possible.

The metric should only consider smart building systems not appliances. Appliances connectivity may well be too intermittent.

8. To what extent do you agree or disagree that information from an energy use metric should be displayed on EPCs? Please select one option for each building type.

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

The kWh/m2 is a valuable metric for comparison.

9. If an energy use metric is to be displayed on Energy Performance Certificates (EPCs), which type of energy use measurement should be used to calculate this metric? Please select one option for each building type.

Domestic buildings

No preference

Don't know

Delivered energy

Primary energy

Other (please specify)

Non-domestic buildings

No preference

Don't know

Delivered energy

Primary energy

Other (please specify)

If you wish, please explain your reasoning and provide any evidence to support your view.

From a Private Sector Housing perspective (relating to domestic buildings) delivered energy is more useful because it focuses owners and tenants on matters within their control.

10. To what extent do you agree or disagree that information from a carbon based metric should be displayed on EPCs? Please select one option for each building type.

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

The metric is too variable to be beneficial.

11. To what extent do you agree or disagree with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings? Please select one option for each building type.

Domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

Non-domestic buildings

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

However, until wider adoption this is likely to be of negatable value to occupiers.

12. Do you have any views on key transition issues?

No

13. What should be the validity period for Energy Performance Certificate (EPC) ratings?

Don't know
Less than 2 years
2 years
5 years
7 years
10 years

Asset investment in the form of upgrades such as heating systems, windows, doors, roofing, insulation etc. tend to be based on expected life cycles of 10 years or longer, therefore if you reduce the EPC validity period then the data is less likely to have changed significantly if no work has been undertaken.

14. To what extent do you agree or disagree with the approach for any changes to validity periods to only apply to new EPCs?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

15. To what extent do you agree or disagree that a new EPC should be required when an existing one expires for private rented buildings?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

This should also be considered for social rented housing too.

16. To what extent do you agree or disagree that the regulations should be amended so that a property must have a valid EPC before it is marketed for sale or rent?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

For the social rented housing sector, this may mean increases to void re-let times due to waiting for an EPC to be completed prior to advertising the property. This would increase rent loss and lead to longer waiting times for those requiring housing from the register, thus also increasing temporary accommodation costs. However, this would improve the data capture for domestic dwellings nationally and improve data cross-tenure, and a more comprehensive EPC regime will help to drive up standards particularly in the private rented sector.

17. To what extent do you agree or disagree that houses in multiple occupation (HMOs) which don't already fall under the (Minimum Energy Efficiency Standards) MEES should do so when a room is rented out?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

18. To what extent do you agree or disagree that there should be a transitional period of 24 months to allow HMO landlords to obtain a valid EPC and comply with MEES regulations?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

19. To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC at the point of being let?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

20. To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC irrespective of who is responsible for meeting the energy costs?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

21. To what extent do you agree or disagree that we should remove the exemption for landlords from obtaining an EPC for buildings officially protected as part of a designated environment or because of their architectural or historical merit?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

This would improve the national data set on domestic dwelling performance.

22. How useful do you find Display Energy Certificates (DECs) for understanding and improving a building's energy performance?

Not at all useful

Somewhat not useful

Neither not useful or useful

Somewhat useful

Very useful

23. Are there any limitations or challenges with the current DEC approach that reduce its effectiveness?

Please provide evidence where possible.

No view

24. What alternative approaches, if any, could drive energy performance improvements more effectively than DECs for public sector buildings?

Please provide evidence where possible.

No view

25. To what extent do you agree or disagree with the proposed changes to the validity periods for DEC's and DEC recommendation reports?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

26. What would be an appropriate validity period in years for these DEC and DEC recommendation reports? Please select a validity period for each option.

DEC 1000m² and under

1 year
2 years
3 years
4 years
5 years
6 years
7 years
More than 7 years
Don't know

DEC recommendation report 1000m² and under

1 year
2 years
3 years
4 years
5 years
6 years
7 years
More than 7 years
Don't know

DEC recommendation report over 1000m²

1 year
2 years
3 years
4 years

5 years

6 years

7 years

More than 7 years

Don't know

If you wish, please explain your reasoning and provide any evidence to support your view.

Over 1000m2 should remain at 7 years. Given public buildings are often also listed/heritage buildings and are owned by local authorities, then reducing the period may place even greater financial strain on local authorities to make required improvements in a shorter time to these types of buildings.

27. There is a proposal to provide an exception in the regulations for certificates that have been marked as cancelled or not for issue to be removed from the Energy Performance of Buildings (EPB) Register after 2 years.

To what extent do you agree or disagree with the proposal?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

28. To what extent do you agree or disagree with the approach to remove the option to opt-out EPCs from the EPB Register public address search?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

The data should be available publicly and we strongly agree with the approach to remove the opt out of the public register. Greater transparency and awareness needed.

29. To what extent do you agree or disagree with retaining the option to opt-out EPC address level content from the Open Data?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

The data should be available publicly Strongly disagree – removal of address level data would reduce transparency/awareness levels/accountability

30. There is a proposal to remove the general prohibition on sharing data gathered under the EPB Regulations and replace it with a Secretary of State discretion about when, how and with whom to share the data.

To what extent do you agree or disagree with the proposal?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

Removal of the general prohibition on use of this data would allow wider utilisation in support of a broader range of policies and initiatives

31. To what extent do you agree or disagree that data gathered in previous EPC assessments should be available for use in future EPC calculations for a dwelling?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

32. What are your views on the approach to using existing data, while balancing accuracy and practicality?

There remain data quality issues with existing EPCs and DEAs undertaking the assessment if previous data was allowed to be used and was inaccurate this would prolong the incorrect assessment.

33. To what extent do you agree or disagree that Accreditation Schemes should be given more responsibility for overseeing the training of energy assessors?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

34. Do you have suggestions for other actions which could be taken to improve the accuracy and quality of energy assessments, or to help identify fraud in EPC assessments?

Consideration should be given to AI tools to be used to identify anomalies between comparable properties before the lodgement is complete. This would allow errors to be identified and corrected.

35. To what extent do you agree or disagree with these proposals to improve compliance?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

If you wish, please explain your reasoning or other ways to improve compliance and provide any evidence to support your view.

36. To what extent do you agree or disagree that penalties should be increased?

Strongly disagree
Disagree
Neither agree nor disagree
Agree
Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

37. If penalties were to increase, how much should current penalties increase by?

Don't know
No increase
Inflation adjusted increase
Doubling
Other

If you wish, please explain your reasoning or other ways to improve compliance and provide any evidence to support your view.

It's important that the penalty and risk of being caught for not obtaining an EPC is higher than being in breach of MEES or falsely registering an exemption. That is likely to require doubling of penalties and a more coordinated system of regulation between LWMAs and LHAs

38. When should penalties be imposed for non-compliance with Energy Performance of Buildings Regulations (EPBR) requirements?

Don't know
At 6 months (no increase)
At 12 months
At 18 months
Following more than 18 months

If you wish, please explain your reasoning and provide any evidence to support your view.

In line with the comment above, these breaches may not come to light until much later. The increased risk of follow-up at a later stage reduces the incentive to deny a new tenant or owner access to this information which they are entitled to.

39. What are your views on changing the current allocation of responsibilities for enforcing Energy Performance of Buildings Regulations (EPBR)?

Support the use of powers in Section 101 of the Local Government Act 1972 for LAs to delegate performance of their functions to other LAs as it allows better coordination and flexibility to use enforcement resources in both LWMAs and LHAs is needed

40. There is a proposal for a new penalty charge fine amount of £800 for non-compliance with the requirement to have an ACIR for systems with an effective rated output over 12kW.

To what extent do you agree or disagree with the proposal?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

41. To what extent do you agree or disagree with the proposal to redesign the structure of ACIRs?

Strongly disagree

Disagree

Neither agree nor disagree

Agree

Strongly agree

42. What should be included in a redesigned report?

No view
<p>43. To what extent do you agree or disagree with the proposal to add a cost metric in the assessment methodology for ACIRs?</p> <p>Strongly disagree Disagree Neither agree nor disagree Agree Strongly agree</p>
<p>44. If you agree to including a cost metric, what would be the most suitable data on air conditioning system output to use in the calculation and how could it be obtained? Please comment both on data quality, suitability and likely availability.</p>
N/A
<p>45. If you agree to including a cost metric, what would be the most suitable data on electricity prices to use in the calculation? Please comment both on data quality, suitability and likely availability.</p>
N/A
<p>46. Please let us know if you have any evidence on the rate of voluntary implementation of recommendations made in EPCs.</p>
No
<p>47. Please let us know if you have any comments on the regulatory or equalities impact assessments presented alongside this consultation, in particular, are there any impacts on groups with protected characteristics that we have not identified in the equalities impact assessment?</p>
No
<p>48. Please let us know if you have any comments on the impact assessment in general, including any evidence you have on the impact of these proposed reforms.</p>
No

