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Submitted to Consultation on Reforms to the Energy Performance of Buildings Regime
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About this Consultation

Please confirm that you have read the Personal Data notice found in the consultation document.

I confirm that I have read the Personal Data notice.

Introduction

What is your name?

Please add your name:
Emma Vinten

What is your email address?

Please add your email address:
evinten@lqgroup.org.uk

About you

1 Are you responding as/on behalf of (select all that apply):

Housing Association, National representative or trade body

2 If you are responding as a member of the public/a building professional, what region are you responding from?

London

3 If you are responding as a member of the public, are you a:

Not Answered

4 If you are responding on behalf of a business/organisation, what is the name of your business/organisation?

Please provide the name of your business/organisation here.:
G15

5 If you are responding on behalf of a business/organisation, where is your business/organisation based/registered?

London

6 When you respond it would be useful if you can confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include: your name, your position (if applicable), the name of organisation (if applicable), an address (including post-code), an email address, and a contact telephone number.

Please provide details here.:

I am responding on behalf of G15. The G15 is the group of London's largest housing associations.
Emma Vinten, Sustainability Operations Manager, Asset Strategy group in L&Q. L&Q is presently chairing the G15.

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Chapter 2: What EPCs measure

Would you like to respond to the questions on 'What EPCs measure'?

Yes

Chapter 2: What EPCs measure

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.

Q: Agreement that using an energy cost metric should be displayed on EPCs. - Domestic buildings:
Agree

Q: Agreement that using an energy cost metric should be displayed on EPCs. - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

We support the inclusion of an energy cost metric in the EPCs display, as it provides a useful reference point for assessing fuel poverty. However, the metric should be labelled or displayed as a secondary metric. Secondary metric should be shown as distinct from headline metric. Additionally, the energy cost metric should clearly indicate that the numbers are estimates based on prevailing energy prices at the point of assessment and average consumption patterns, rather than an individual's actual usage. A disclaimer should be made about the unpredictability of energy prices with possible fluctuations, especially when an EPC is valid for 10 years. The government should clarify whether metrics are actual figures or tiered and coloured coded for each band.

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.

Q2: Agreement that information derived from a fabric performance metric displayed on EPCs - Domestic buildings:
Strongly agree

Q2: Agreement that information derived from a fabric performance metric displayed on EPCs - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

We strongly welcome the inclusion of a Fabric Performance metric, as this aligns with the government's direction of prioritising fabric improvement works. With the inclusion, housing associations could easily identify which buildings should be prioritised for improvement works. We are committed to achieve net-zero in our homes by 2050. This metric is also helpful in addressing fuel poverty, since homes with poor fabric performance often have a greater risk of fuel poverty.

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.

Q3: Fabric performance of buildings methodology - Domestic buildings:
FEES

Q3: Fabric performance of buildings methodology - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

FEES measures show quickly a given space heats up and cools down, accounting for heat loss in cold weather and the risk of overheating.

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.

Q4: Agreement that information based on a heating system metric displayed on EPCs - Domestic buildings:
Strongly agree

Q4: Agreement that information based on a heating system metric displayed on EPCs - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

5 What are your views on the design principles and the scope for a Heating System metric?

Please provide evidence where possible. Please do not include personal data in your response.:

The inclusion of a Heating System metric would support the transition to low carbon heating. The government should also consider providing financial assistance and knowledge transfer for housing associations to make the appropriate decisions on their Heating System.

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.

Q6: Agreement that information based on a smart readiness metric displayed on EPCs - Domestic buildings:
Agree

Q6: Agreement that information based on a smart readiness metric displayed on EPCs - Non-domestic buildings:

7 What are your views on the definition, design principles and the scope for a smart readiness metric?

Please provide evidence where possible. Please do not include personal data in your response.:

We believe that smart readiness should not be a primary metric in the EPC, though it can be considered a secondary metric. Smart devices can help inform consumers about their household electricity consumption and measure solar energy production for those with solar panels.

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.

Q8: Agreement that information from an energy use metric displayed on EPC - Domestic buildings:
Agree

Q8: Agreement that information from an energy use metric displayed on EPC - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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.

Q9: 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 - Domestic buildings:
Delivered energy

Q9: 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 - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

We believe that reporting delivered energy is consistent with industry standards, much like how electric appliances determine their energy labels. Reporting primary energy is likely to lead to confusion for households unless they have information on personal energy or carbon budgets. In addition, households may not be aware of the differences between primary and delivered energy, which may result in miscalculations.

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.

Q10 : Agreement that information from a carbon based metric should be displayed on EPCs - Domestic buildings:
Agree

Q10 : Agreement that information from a carbon based metric should be displayed on EPCs - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

We think that carbon metric should be included in the EPC given the government's 2050 net-zero target, but should not be a headline metric. Headline metric should be user friendly and easy to understand, which is less of the case for carbon metric from a user's perspective. Carbon metric would be definitely useful for housing associations when measuring the progress towards net-zero.

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.

Q11: Agreement with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings - Domestic buildings:
Agree

Q11: Agreement with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings - Non-domestic buildings:

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

Smart technology, including smart meters, can provide households with insights into their energy consumption and encourage behavioural change.

12 Do you have any views on key transition issues?

Please provide evidence where possible. Please do not include personal data in your response.:

We welcome the new EPC standards but seek clarification on how the government plans to align the two different sets of standards and data formats. As housing associations, we manage many buildings, and having two different EPC standards creates additional challenges for planning decarbonisation and fuel poverty programmes. In addition, this increases the likelihood of non-compliance and widespread EPC downgrades. The government should explain how existing EPCs can be converted to the new standard, enabling housing associations to adopt a consistent approach for reporting and modelling both during and after the transition period.

EPCs ratings are not updated when homes undergo modifications which impact its energy efficiency or costs under the current regulations. Several G15 member have a modelling software which predicts the impacts of home modifications on EPC ratings. According to one member, they will update their energy data monthly which enables them to model in real time their retrofit delivery and decarbonisation progress. Any changes to the methodology should consider that this will reduce their data set. Further consultation must be considered if EPCs and any new metrics were going to be used as the

sole report to influence retrofit and net zero funding.

The government should explain EPC changes in a clear and accessible manner to ensure they are easily understood by end users. Given the technical nature of EPC requirements, there is a risk that only industry players will be aware of the new requirements, while end users remain uninformed about what the changes entail.

When EPCs and DEC's are required

Would you like to respond to questions on 'When EPCs and DEC's are required'?

Yes

Chapter 3: When EPCs and DEC's are required

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

10 years

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 agree

If you wish, please explain your reasoning, and provide any evidence to support your view. Please do not include personal data in your response. :

There is a significant gap in expertise and quality among EPC assessors in the market. The government should raise the bar for EPC assessors by introducing more stringent training requirements or an enhanced accreditation scheme.

Reducing the EPC validity period to less than 10 years would increase demand for EPC assessments, potentially creating additional pressure and leading to a further decline in quality. However, a longer EPC validity period could create greater uncertainty regarding energy costs, and this should be clearly communicated to end users.

We strongly agree that any changes in validity period should only be made to new EPCs carried out after the policy is implemented. If the government implements the changes for EPCs that are already lodged, this would be very disruptive and confusing to the sector.

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?

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

Currently a new EPC is required when one expires only if there is a change of occupant and it is being sold or let, this should stay in place.

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 agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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?

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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?

Neither agree nor disagree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

HMO should carry out EPCs on their property to inform their occupants on the updated energy rating. To delay the transition period to 24 months may result in EPCs being carried out at the very end of the deadline which would overload the supply chain. Nonetheless, the government should consider staggering the transitional period in relation to the size of the properties. For instance, properties with 10 rooms would have 24 months while properties with 8 rooms have 18 months.

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?

Not Answered

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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?

Not Answered

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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?

Neither agree nor disagree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

The exemption can only be removed once a consultation has been carried out on the historic buildings and the implications, as current EPCs are not geared up to report on homes such as listed buildings. However, consideration should be made for possible changes to the EPC that allows for these properties to be reported in the future as it would help occupants to better understand their homes.

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

Not Answered

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

Please provide evidence where possible. Please do not include personal data in your response.:

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

Please provide evidence where possible. Please do not include personal data in your response.:

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

Not Answered

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.

Q26: An appropriate validity period in years for these DEC and DEC recommendation reports - DEC 1000m² and under:

Q26: An appropriate validity period in years for these DEC and DEC recommendation reports - DEC recommendation report 1000m² and under:

Q26: An appropriate validity period in years for these DEC and DEC recommendation reports - DEC recommendation report over 1000m²:

If you wish, please explain your reasoning and provide any evidence to support your views. Please do not include personal data in your response. :

EPC and DEC Data

Would you like to respond to questions on 'EPC and DEC data'?

Yes

Chapter 4: EPC and DEC Data

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?

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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?

Agree

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

Disagree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

This provides valuable data needed to understand how homes perform at a much large scale than solely at unit level.

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?

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

We welcome this proposal as it would improve data quality and make for a more accurate assessment. However, the training quality of energy assessors must also be reviewed. We experienced inconsistencies depending on whom has carried out the assessment, since different assessors have their own interpretation for certain elements such as age, walls type, floors type. This is why it is crucial for accreditation bodies to oversee and even carry out the training and audit among a higher percentage of assessed EPCs.

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 Agree

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

Please provide evidence where possible. Please do not include personal data in your response.:

This would be welcomed to improve the data.

Managing EPC Quality

Would you like to answer questions on 'Managing EPC Quality'?

Yes

Chapter 5: Managing EPC Quality

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 agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

It is crucial that the accreditation schemes take the lead and responsibility for overseeing the training of all energy assessors to ensure consistency. This will raise the quality and standards required to carry out EPCs. The accreditation scheme should also be required to audit a higher percentage of the EPCs carried out by the energy assessors. Doing this will inevitably increase the cost for accreditation membership among energy assessors and this cost maybe passed on through onto an increase of the EPC cost. However, we believe that higher costs are justified by raising the quality of EPCs.

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?

Please provide evidence where possible. Please do not include personal data in your response.:

Evidence is crucial when carrying out EPCs. The accreditation platforms that the energy assessors use must be improved to include more evidence with prompts put on the system, so that evidence is recorded throughout the assessment without any being missed. Any selection made should be done with detailed photographs showing the element being selected with the reasons and documentation being accompanied.

At present the EPC is not an invasive assessment however as these new metrics are being considered then it is time to review if an invasive assessment to a small degree would be an option to increase accuracy, however we need to be mindful when looking at an invasive element to make sure the energy assessor carrying out is competent and does not cause any further issues to arise such as mould and damp, water ingress. Invasive measures such as drilling a hole in the mortar to check for wall insulation would help to inform any decisions on a fabric first approach and may reduce further costs in the future.

The evidence for measures identified should include but are not limited to:

- EWI then documentary evidence should be supplied along with photos of the wall including its thickness etc
- Cavity wall insulation should be evidenced with detailed photos of the drill marks and any other information applicable
- Loft insulation should be evidence with detailed photos of the thickness of the insulation, but not just by the loft hatch. A risk assessment must be carried out before entering the loft however detailed evidence of a series of photos for the whole loft would show the accuracy better.
- Heating and hot water – detailed photos of the system including the flu and any serial numbers to prove the make and model when available.

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

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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

Agree

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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

Inflation adjusted increase

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

The key is enforcement as a deterrent not so much the amount as the more you enforce the non-compliance should decrease. With that in mind we have selected an inflation adjustment increase as this would be fairer in this market.

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

At 12 months

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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

Please provide evidence where possible. Please do not include personal data in your response.:

There should be enforcement, however this needs to be consistency and in line across all standards.

Air Conditioning Inspection Reports

Would you like to answer questions on 'Air Conditioning Inspection Reports'?

Yes

Chapter 6: Air Conditioning Inspection Reports

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?

Not Answered

If you wish, please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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

Neither agree nor disagree

42 What should be included in a redesigned report?

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

The new report must be clear and simple for the user to read, as too much information risk overwhelming the reader. The audience must be considered when designing the report with clear instructions on how to read it.

43 To what extent do you agree or disagree with the proposal to add a cost metric in the assessment methodology for ACIRs?

Neither agree nor disagree

Chapter 6 continued: Air Conditioning Inspection Reports

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.

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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.

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.

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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.

When looking at fuel prices in regard to the cost metrics, must be clear on the EPC what prices have been used to make the calculations as the market is volatile and the occupant needs to understand what prices were used and at what time.

Chapter 7: Additional Questions

46 Please let us know if you have any evidence on the rate of voluntary implementation of recommendations made in EPCs.

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response. :

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?

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.:

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.

Please explain your reasoning and provide any evidence to support your view. Please do not include personal data in your response.: