

Appendix 1 – Combined Authority Response to the Reform to the Energy performance of buildings regime Consultation

Submitted 26/02/2025

<p>Question 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.</p>	<p>Domestic Buildings: Agree</p> <p>Non-Domestic Buildings: Agree</p>
<p>Explain reasoning:</p> <p>Domestic</p> <p>Energy cost metrics should be included in Energy Performance Certificates for domestic buildings, but they should not be the primary metric. Whilst it is important for consumers to understand and compare the costs of energy use in the home, energy cost metrics alone are not a direct measure of energy efficiency. We would suggest that a methodology is provided whereby when a property is sold the cost may be calculated using the current owners actual cost per unit and standing charge to give a timely and accurate value.</p> <p>It is however important to include as energy costs are a primary concern for homeowners and a main motivator for making energy-saving improvements. Additionally, energy cost metrics are needed to support policies aimed at reducing fuel poverty and could be useful for allowing consumers to compare running costs of different homes. They should therefore be accessible and easy to understand, as well as easily comparable with additional information provided on how improvements might be made.</p> <p>The energy cost metric should be placed in context so that it does not incentivise outcomes we do not want to see. For example, the existing Energy Efficiency Rating, based on energy costs, incentivises cheaper options like installing a more efficient fossil fuel boiler as opposed to prioritising fabric efficiency improvements or low carbon heating. Additionally, a static energy cost metric included on an EPC may not be useful as the cost of energy can vary drastically outside of the control of the homeowner. Metrics should be dynamic and updated automatically, rather than static and potentially quickly out of date. This could include linking to live energy costs and fuel carbon intensity figures.</p> <p>It is suggested that a metric be considered which looks at the wasted energy of a property; as the grid decarbonises the carbon cost becomes more; however, there is a carbon cost still through the embedded carbon in the infrastructure needs of renewables as such wasted energy has a cost implication both carbon and environmental. An energy leakiness parameter may be useful to drive energy efficiency measures further.</p> <p>Non-domestic</p> <p>Similarly to the comments on domestic buildings, the energy cost metric is useful but only when placed in context. A challenge for non-domestic buildings, is that they often have a number of tenants. This can cause issues due to different energy usage patterns and priorities, which would result in drastically different forecast energy costs.</p> <p>Additionally, non-domestic buildings refers to buildings with a wide range of uses and so metrics may need to be sector-specific, notwithstanding the previous challenge. It is suggested that benchmarking and a leakiness parameter could be used to drive improvements in energy efficiency and a fabric first approach.</p>	

<p>Question2: 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.</p>	<p>Domestic Buildings: Strongly agree</p> <p>Non-Domestic Buildings: Strongly agree</p>
<p>Explain reasoning:</p> <p>The inclusion of a fabric performance metric would incentivise building owners to undertake fabric efficiency measures such as insulation, as opposed to the current EER which incentivises fossil fuel boilers. Fabric efficiency improvements to a property can provide long-term energy savings for property owners which strongly align with ambitions to reach net zero and reduce the need for repeated replacement of measures compared to shorter-term solutions like boilers.</p> <p>Furthermore, the inclusion of a fabric performance metric would provide a more accurate indication of the underlying energy performance of domestic and non-domestic buildings as it is not affected by the type of heating system used.</p> <p>The inclusion of a fabric performance metric such as space heating demand intensity (kWh/m²/yr) can allow an easy comparison to actual energy consumption and could be used to assess the performance of existing building fabric and any improvements made.</p> <p>The inclusion of a fabric performance metric would enable the tracking of improvements to the fabric of the housing stock, which would assist in monitoring policy progress and provide a rich amount of data for future policy and project design.</p> <p>Encouraging fabric efficiency improvements supports the preparation of buildings for low-carbon heating solutions, future-proofing properties and encouraging progress against our net zero ambitions.</p> <p>Consideration as to how this information is presented to residents should be a key factor. It is important to ensure that EPCs are simple and easy for a resident or property owner to understand.</p>	

<p>Question 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.</p>	<p>Domestic Buildings: HLP</p> <p>Non-Domestic Buildings: FEES</p>
<p>Explain reasoning:</p> <p>Domestic Buildings</p> <p>For domestic buildings, a methodology that combines Heat Loss Parameter (HLP) with air tightness measurements would be most informative.</p> <ul style="list-style-type: none"> • HLP directly quantifies heat loss through the building fabric, which is a measure of energy efficiency. • Air tightness significantly impacts energy consumption and indoor air quality. By including both, the metric provides a comprehensive assessment of fabric performance. • Overheating should also be considered as more extreme heat impacts the UK • FEES, whilst being more comprehensive, could add additional costs onto assessments which likely would be borne by the homeowner. 	

HLP aligns with a fabric-first approach to decarbonisation of buildings, first prioritising a reduction of energy loss at the source before considering energy regeneration.

HLP can be easily simplified for a non-technical audience by translating the results into a scale or rating system. Practical advice for homeowners can be offers to improve fabric efficiency, making the EPC results more easily actionable.

Nonetheless, HLP and air tightness assessments requires detailed data collections which may increase costs for homeowners, and so this should be considered.

Non-Domestic Buildings

For non-domestic buildings, a more comprehensive approach like **Fabric Energy Efficiency Score (FEES)** is recommended.

- Non-domestic buildings have diverse uses and complexities, making a single metric like HLP insufficient.
- FEES considers various factors beyond heat loss, such as solar gains, thermal bridging, and operational factors, providing a more holistic assessment. This is more suitable for non-domestic buildings

Regardless of building type, the methodology should be standardised to the building type and widely accepted to ensure consistency, easy to calculate and understand, and be adaptable to different building types and sizes to accommodate diverse needs.

Question 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 agree

Non-Domestic Buildings: Strongly agree

Explain reasoning:

Domestic:

Inclusion of a heating system metric would provide clarity for residents on the merits of different heating technology. Current cost based metrics (Energy Efficiency Rating) do not provide an insight into relative performance, and so does not effectively incentivise low carbon heating systems, instead resulting in perverse outcomes where fossil fuel systems achieve a better rating. A ranked system, looking at low emission/hybrid/heat networks/biomass/fossil fuel heating sources could provide a key source of information for residents. This would need to be tailored to the individual's home, to be most useful.

A dedicated heating system metric would provide homeowners with an improved understanding of how their heating system contributes to overall energy use and carbon emissions in the home, supporting more informed decision making when replacing the system.

Further, the inclusion of a heating system metric would support the development of policy options which incentivise low carbon heating where appropriate, including utilising the heating metric as the basis for financial support.

Non-domestic

Similar to domestic, a heating system metric would provide property owners the information needed to understand the options for upgrades within their buildings. It would provide a

transparent mechanism for property owners to demonstrate commitments to net zero targets, as well as providing a mechanism for investor to compare properties and analyse performance data.

Related to both, is the need for adequate training for assessors to accurately assess heating systems and provide reliable information, due to low carbon heating systems become increasingly complex.

The provision of additional metrics needs to be carefully balanced with supporting home/building owners to understand them, and ensure it is accessible. Avoiding the potential overwhelm and confusion that may be felt, and ensuring that they are able to engage with the certificates as a tool to undertake necessary improvements.

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

Explain reasoning:

The introduction of a clear ranked system is welcomed and will provide residents/property owners with a clear hierarchy which they can use to make informed choices. Additionally, a focus on a wider consideration than carbon emissions alone is welcomed, as residents/property owners will value different aspects of a system and so a range of information is important to help them make informed choices. Further, efficiency considerations allow residents to make informed choices about their properties.

It is important that the metric is flexible to the specific house or non-domestic building, to ensure that the resident/property owner is able to get clear information about their property. This could also include a visual aid to support understanding.

Further, the metric should ideally be standardised across all sectors:

- Have clear, simple naming conventions
- Easy-to-interpret presentation
- Transparent categorization methodology

The metric should prioritise low carbon heating systems over fossil fuel systems, in alignment with net zero ambitions.

The metric should communicate clearly the interaction between the building's fabric and its heating system, highlighting how, for example, a high-efficiency system may underperform in a poorly insulated property. Heating system performance must be considered in context, and reflect the variety of building archetypes.

The metric may also wish to consider:

- Seasonal impacts on efficiency
- Carbon emissions
- Fuel type, sustainability and cost

Question 6: To what extent do you agree or disagree that information based on a smart

Domestic Buildings: Strongly agree

Non-Domestic Buildings: Strongly agree

readiness metric should be displayed on EPCs? Please select one option for each building type.	
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Question 7: What are your views on the definition, design principles and the scope for a smart readiness metric? Please provide evidence where possible.	
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Explain reasoning:

The future of a building’s energy is increasingly dependent on smart and flexible energy technologies, including energy storage, smart controls, and on-site generation like solar panels. The scope of a smart readiness metric should give a measure of a home's capacity to use energy flexibly, which will be important as the grid becomes more decarbonised and as consumer outcomes and peak load management become increasingly important.

This metric would reflect the combined performance of technologies that allow for flexible energy use. To note also, the European Commission has supported extensive research into a Smart Readiness Indicator and this should be taken into account here. That research aimed to assess the capability of buildings to optimise their operation and interact with occupants and the grid.

Key aspects of the SRI include:

- Evaluating a building's technological readiness to adapt to occupant needs
- Assessing energy efficiency optimization potential
- Measuring flexibility for grid interaction
- Rating the building's ability to enable demand response

It is crucial that any smart readiness indicator accounts for the needs of all participants in the energy system. For example, balancing the needs of system operators through building-grid flexibility whilst simultaneously benefitting occupants and building owners financially, or otherwise. The metric should also be readily understandable and communicable to the wider public if it is to be successful in its use. An example of this was proposed by Italian researchers in the form of a Flexibility Performance Indicator (FPI), provides a measure of a building’s flexibility potential using four metrics (<https://doi.org/10.1016/j.apenergy.2019.113387>). Using a compound metric like this can balance the needs and benefits of different participants, whilst still providing meaningful information to the wider EPC.

This aligns with the need to move beyond simple energy efficiency metrics to capture a more holistic view of building performance. This view should include the ability of a building to be an active participant in the energy grid, not just a passive consumer.

Any such Smart Readiness Indicator should be considered in line with wider education on smart technologies and awareness of potential associated security risks. Note that there is an increasing resistance to smart meters in homes where residents facing fuel poverty know they could be cut off instantly with the flick of a switch by the utility provider.

Question 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: Agree Non-Domestic Buildings: Agree
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Explain reasoning:

Total energy use intensity as a metric, would provide a transparent indication of underlying efficiency of buildings and would provide a clear factor for comparison between different buildings, and consistent measure of building performance which is less affected by external factors. A call for the use of Energy Use Intensity as a metric has been called for in research published by the National Retrofit Hub also.

However, if it is to be utilised, it should be done so in a way which allows residents to clearly understand what it means. 'kWh/m/yr' may not be accessible to everyone, and so a ranking, key or comparisons should be provided to aid resident/property owners understanding. Research from Which? ("Transforming EPCs: Consumer Research Insights and Recommendations") highlights that technical terminology can be confusing for the average consumer, and causes them to disengage from taking an interest in their properties energy efficiency.

Question 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: Delivered Energy

Non-Domestic Buildings: Delivered Energy

Explain reasoning:

Delivered Energy represents the energy delivered to the building to meet its energy demand, and reflects the actual fuel used in the building (excluding on site generation which could be identified elsewhere) and should be generally more understandable for users.

Although Primary Energy is useful as it accounts for losses and inefficiencies, it is also affected by factors outside of the control of building owners e.g. changes to the electricity grid mix.

This could lead to confusion for building owners, and so Delivered energy, representing actual building energy use, would make more sense and be more consumer friendly.

Nonetheless, alongside the Delivered Energy metric should be an explanation of the impacts of occupancy. How the building is used and how many people use it can additionally impact on energy use and buildings may, therefore, not be easily comparable.

Question 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: Agree

Non-Domestic Buildings: Agree

Explain reasoning:

Carbon-Based metrics should be included on EPCs, however not as the primary indicator. The Which? Report shows that consumers want to contribute to tackling climate change, however, they often struggle to understand the connection between home heating and environmental impacts. Their recommendation to include relatable carbon comparisons (e.g. car journeys) and

reinstate the environmental impact graph currently used in Scottish EPCs, would make this more accessible and meaningful to consumers.

We agree with the Governments concerns around using carbon metrics as the primary indicator, particularly given that emission factors change over time, which could affect a property's rating even without physical changes.

Furthermore, the observation that the current Energy Efficiency Rating (EER) can actually incentivize cheaper but higher-carbon options (like gas over electricity) also suggests that while carbon metrics are important to display, they need to be carefully implemented alongside other metrics to effectively drive behaviour toward net-zero goals. A balanced approach that includes carbon information while potentially emphasizing other metrics, such as the proposed heating system metric, would better serve both environmental and practical purposes.

It is suggested that a carbon factor could be included that just accounts for onsite fossil fuel consumption. With grid electricity due to become net zero by 2030 seen as less important.

Question 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: Agree Non-Domestic Buildings: Agree
Explain reasoning: The inclusion of real world data from smart meters, would allow confidence in the ratings being undertaken and ensure property owners are provided with a realistic assessment of their buildings energy use. In addition, the provision of live smart meter data should be utilised to automatically update the EPC rating of a building, ensuring that certificates remain current and up to date rather than 'static'. It is suggested that the EPC database be live and updatable such as when windows, heating insulation or other building control notification is needed to ensure that the EPC database is the most accurate it can be to enable better use of resources in targeted retrofit campaigns. Further education and engagement with consumers would be required to support property owners with a switch to smart meters. Enabling appliances to speak directly to smart meters may also drive energy efficiency savings through actual energy use of the appliance and or remote switch off if left on via communication.	

Question 12: Do you have any views on key transition issues?	
We are supportive of the move to a Home Energy Model (HEM) rather than SAP, as an updated and more accurate representation of homes energy usage. However, the introduction of a new EPC in the second half of 2026 needs to be accompanied by adequate guidance, and training, for those who produce EPCs. Additionally, public awareness and education will be vital to ensure public acceptance and understanding it has been observed that	

there is substantial knowledge gaps and competencies of assessors and that self-regulation by the trade bodies is insufficient to deliver the standards required for accurate performance of buildings. Changes in the level of training and prerequisite knowledge for assessors should be considered alongside these reforms or the use of 'assumed' will continue to be the dominant phrase in EPCs

The government should therefore confirm as soon as possible the metrics which will be included in both the Home Energy Model methodology, and the specific EPC methodology to enable the sector to prepare adequately and upskill as appropriate to hit the ground running.

In addition, the new EPC may result in differences to EER-based calculations, and so homeowners should be supported to understand the difference. This includes for those who's ratings have fallen (to understand why) and those who have risen (to understand why and eliminate complacency). A new EPC should be required for all properties being sold from 2026 and not rely on one conducted within the last 10 years under the old system. The same should apply between long term tenancies.

Making the EPC register live and updatable would reduce these costs and a major EPC required over a longer period as is now the case allow for the most accurate information being available to consumers, vendors and purchaser. It would also provide government with a more accurate measure of how the second largest sector was progressing towards net zero; enabling better targeting of government funding and less waste.

Question 13: What should be the validity period for Energy Performance Certificate (EPC) ratings?	<ul style="list-style-type: none"> • 5 years
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Question 14: To what extent do you agree or disagree with the approach for any changes to validity periods to only apply to new EPCs?	Agree
<p>Explain reasoning:</p> <p>EPCs remaining valid until the end of their existing validity period and only apply new validity periods to new EPCs is fair and allows those who are in the private rented sector to prepare for the changes.</p> <p>However, the proposal to provide a 2-year transition period whereby EPCs are invalidated at the end is also fair and should provide ample time for EPCs to be revised. This would result in more up-to-date EPC data being available sooner.</p>	

Question 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
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Explain reasoning:

Renting out a property is a form of business, and as such, up-to-date certifications should be required when they expire. This would also ensure that EPC data is up-to-date to inform policy design, and we agree with the proposal that the EPC should be regarded the same as other certificates required in order to rent out a property (gas safety, building insurance etc).

Ensuring that a valid EPC is always available for private rented buildings provides additional support to tenants, ensuring they can understand the running costs of the property. MEES regulations similarly become easier to enforce and monitor and an opportunity for landlords to undertake improvements is created, further improving conditions for tenants.

Nonetheless, Local Authorities must be supported with this additional monitoring and enforcement of MEES compliance. Local authorities must also have full support in utilising enforcement powers to fully disincentivise non-compliance and enable tenants easy and accessible reporting methods to notify local authorities of landlords who are in breach of the law, as well as support understanding their rights. National reform to ensure stricter penalties for non-compliance and better legal recourse for tenants who find their landlords to be in breach of the law will also be essential to ensure effective adoption.

Question 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?

Agree

Explain reasoning:

Provision of accurate information is important when purchasing a property. Ensuring that an up-to-date EPC is provided when a property is for sale, would encourage prospective buyers to consider EPC ratings in their thought process when buying, including the provision of green mortgage products which may provide preferential rates for houses with more positive EPCs.

In the private rented sector, this would strengthen compliance with MEES.

Renewal of an EPC before sale or rental provides an opportunity for the owner (or new owner in the case of a sale) to make energy efficiency improvements, as well as potentially creating a correlation between energy efficiency and value of property which would allow the general public to make more informed decisions. This could lead to a higher adoption of measures, therefore contributing to our net zero commitments.

Should this regulation be amended, there should be clear enforcement responsibilities and penalties for non-compliance, with relevant organisations being supported to enforce and / or monitor as appropriate.

It should also be considered that implementation may lead to an increase in fraudulent or illegitimate EPCs, as well as unofficial routes for rental or sale being taken which could compromise purchasers or tenants' rights.

Question 17: To what extent do you agree or disagree that houses in multiple occupation

Agree

(HMOs) which don't already fall under the (Minimum Energy Efficiency Standards) MEES should do so when a room is rented out?	
<p>Explain reasoning:</p> <p>This would introduce consistency across the private rented sector, which typically is harder to reach and harder to access data on. It would allow for students and more vulnerable people (who are more likely to occupy HMOs in a higher proportion) to make more informed choices on their accommodation, and also provide Local Authorities with the data needed to encourage investment in these properties.</p> <p>Ensuring that an individual room rentals in HMOs comply with MEES for the building means that tenants would be more likely to benefit from a warmer home and lower energy costs, meaning that fuel poverty may be reduced as a result.</p> <p>Local Authorities must be supported with adequate resource and powers to ensure consistent enforcement and compliance with MEES.</p> <p>Some HMO landlords may benefit from support to ensure they can meet MEES, which may include advice and flexible timescales.</p> <p>Protections should also be in place for tenants in HMOs which don't currently meet MEES. This might include a phased approach to deadlines for landlords to avoid evictions as a result of non-compliance, which could negatively impact upon more vulnerable tenants. Similarly, measures should also be put in place to protect tenants from rent increases by landlords to cover their increased costs related to energy efficiency.</p> <p>Moreover, tenants in HMOs may be at risk of unsafe building practices due to properties being divided without permission or unsafely which has the potential to compromise energy integrity. This practice should therefore be linked to wider safety reforms in relation to HMO properties.</p>	

Question 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?	Agree
<p>Explain reasoning:</p> <p>A transitional period will allow HMO landlords the time to consider, and deliver, any necessary renovations they may wish to undertake to comply with MEES and obtain a suitable EPC rating which reflects the requirements in the suggested metrics.</p> <p>A transitional period would also reduce the number of evictions as a result of non-compliance, ensuring that more vulnerable tenants are offered some protection.</p> <p>Additionally, this period should be utilised to make tenants aware of their rights and their landlord's obligations, as well as developing national reform to provide tenants with easier and more accessible routes to hold landlords to their legal obligations. Consideration should also be given in relation to protecting tenants from defacto no fault evictions, e.g. where rent is increased and forces the tenant to leave.</p>	

Question 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?	Agree
<p>Explain reasoning:</p> <p>The requirement of short-term rental properties to have a valid EPC will bring the properties in line with the rest of the rental sector and help to ensure that these properties are up to an expected standard.</p> <p>The requirement would also avoid a potential loophole in short-term rentals being used as de facto long-term accommodation.</p> <p>This would also enable customers / tenants to make informed decisions regarding property comfort and carbon emissions.</p> <p>The more familiar that the public becomes with seeing EPCs, the more likely people are to consider making energy efficiency improvements to their own properties.</p>	

Question 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?	Agree
<p>Explain reasoning:</p> <p>The short-term rental sector should be treated the same as the rest of the private rented sector. As a business, those with short-term rentals should hold the required certification.</p> <p>Moreover, there is an incentive for landlords of short-term rentals to improve their property's energy efficiency, as the obligation for energy bills within short term rentals often falls on the landlord. It will also ensure that the property is at an appropriate standard for resale. If this becomes mandatory for all but short-term rentals, it is likely that the property may face devaluation below market rates when resold, as buyers become accustomed to higher standards.</p>	

Question 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?	Agree
<p>Explain reasoning:</p> <p>Protected buildings should have their character and reason for being protected upheld. However, requiring EPCs will allow for building owners and tenants to gain an understanding into the energy use and comfort level of the building. These should however be tailored to the style of building</p>	

and recognise the differences as a result of being a heritage building, including highlighting key risks and caveats to existing advice.

Whilst protected building may have additional complexities for improved energy efficiency, they should not be perceived as exempt.

The requirement of an EPC may also provide an impetus to building owners to undertake maintenance on their properties and ensure they are well-kept.

In private rented properties, this avoid properties being excluded from MEES, offering standardised protections for all tenants.

Support may be needed for landlords to meet MEES or act upon their EPC guidance, which may include additional advice provision or flexibility in planning requirements to ensure that properties can be retrofitted in a way which is sensitive to the building's architectural or historical merit. Grants or financial / tax incentives may also be used to encourage action from owners of buildings for which energy efficiency improvements may be more complex.

This is imperative to avoid this becoming a loophole in the law. There is a risk that landlords would utilise this to avoid providing safe and comfortable homes for their tenants. Without an enforced EPC, tenants would not be able to make informed decisions before financially committing to a tenancy.

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

Neither not useful or useful

Explain reasoning: While DECs include information on a non-domestic building's energy performance, they are unlikely to help understand or improve a non-domestic building's energy performance because the information is not in an easy-to-read format and is not detailed enough. DECs do not include a breakdown of energy use in the building or identify high usage in certain areas. This is much better addressed via an energy audit which will make recommendations and identify savings, cost and paybacks.

The recommendation reports are typically too simple to lead to further improvement.

There may be a small number of circumstances where the public sector organisation is motivated to improve the rating of the building's energy performance due to the public display requirement but not something that we are aware of happening.

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

Yes

Explain reasoning: The current DEC approach does not identify where energy is used in the building, nor does it help with the management of a portfolio of buildings. The rating is too crude

to allow meaningful comparison between buildings. The recommendation report is typically too basic to lead to meaningful improvement

If the aim of the public display requirement is to communicate the building's performance, the certificate design limits the effect of this and it is unlikely to mean much to the public. Clearly stating total annual carbon emissions and making clear what the numbers and ranges relate to would help.

Some of the DEC information is not available online.

Question 24: What alternative approaches, if any, could drive energy performance improvements more effectively than DEC's for public sector buildings?

Explain reasoning:

Annual reporting of carbon emissions for public sector bodies. Note that to achieve improvement in energy/carbon emissions performance this would need to be supported by:

- Quarterly or monthly monitoring and targeting
- Energy walkrounds
- Energy audits to identify measures and paybacks

Including the % change in total building carbon emissions (and associated energy use) compared with previous years as a metric, or annual trends graph would be more effective ways of showing changes in energy performance.

Breakdown of lighting, heating, ventilation, process energy use where available.

More detailed recommendation reports identifying no or low cost actions and short payback period measures – this will require more in-depth training/skills of energy assessors.

Details on whether lighting is energy efficient, lighting and heating controls, heating type and efficiency, variable speed fans etc.

Consider including building age to link this information with the requirements for government grants such as the public sector decarbonisation scheme.

Question 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 Agree

Question 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

- **5 years**

DEC recommendation report 1000m² and under

- **5 years**

DEC recommendation report over 1000m²

- **4 years**

Explain reasoning:

A recommendation report that is over 5 years old is likely not to be meaningful for any building whatever the size due to changes to the building and technologies. We would suggest considering 4 years for buildings over 1000m². However see comments about current recommendation reports being too simplistic.

Question 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.

Neither agree nor disagree

Explain reasoning:

We can see the benefits of the proposal, as this will allow the overall accuracy and reliability of the register to be improved. Retaining outdated or invalid certificates could risk confusion, misrepresentation of energy performance data and lack of trust in the system. Removing the certificates could alleviate this.

However, it could also reduce transparency – as it would eliminate the audit trail for these certificates which could be necessary for dispute resolution, compliance monitoring or research purposes.

A more balanced approach would be to archive such certificates in a separate, non-public database to maintain the integrity of historical data whilst ensuring the public register is clear.

EPC certificates must be clearly dated to demonstrate when the expiry date is and clearly marked as cancelled while still being available. These reforms should work with property websites and estate agents to mandate the listing of an up-to-date EPC in order to be listed.

Question 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 agree

Question 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

Explain reasoning:

Although there may be concerns about misuse of data and privacy, there are more benefits to removing the option to opt-out:

- Transparency for tenants and buyers
- LAs have accurate records for monitoring and enforcement of MEES in rentals.
- Improves policy development, research & targeting of support.
- Avoids landlords opting out to avoid scrutiny.

- Driver for market-led energy efficiency improvements.

Question 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

Explain reasoning:

The proposal to replace the general prohibition on sharing data under the EPB Regulations with a Secretary of State's discretion raises both opportunities and concerns. On the one hand, this change could allow more effective use of data to support energy efficiency initiatives, research, and policy development. Sharing aggregated or anonymised data with relevant stakeholders—such as researchers, local authorities, or energy efficiency programmes—could drive innovation and better-targeted interventions to improve building performance, aligning with the broader goals of decarbonisation and energy savings.

However, granting the Secretary of State broad discretion introduces potential risks, particularly regarding privacy, transparency, and misuse of data. Without clear criteria or safeguards, there could be a lack of accountability in how data is shared, raising concerns about overreach or the inappropriate release of sensitive information. To strike the right balance, the proposal should be accompanied by robust governance measures, such as clear guidelines, consultation requirements, and transparency about how decisions on data sharing are made. With these safeguards in place, the benefits of leveraging EPB data could outweigh the risks.

Question 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?

Agree

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

Explain reasoning:

Pre-existing data, when validated could be used practically where there are minor upgrades (e.g. loft insulation, smart thermostats) and its use could potentially decrease costs and administrative burden. It can also improve consistency across assessments by different surveyors, and a more consistent application of requirements.

However, it is crucial that existing data is reliable, as minor changes to a building can accumulate over time, and building fabric can deteriorate. If an assessor cannot validate the existing data, this may lead to erroneous calculations. Incremental changes can enhance energy efficiency; thus, occupants might not realise that several small improvements might lead to a lower rating than an assessor would expect. Utilisation of existing data should not be prioritised for the sake of efficiency over accuracy.

There should be clear guidelines on what data can be utilised and how, ensuring compliance with data protection regulations and ensuring accuracy of results.

From a homeowner's perspective, they want information that is specific to their property and not generic. They may also want to be able to update their EPC with evidence of improvements from certified traders. The ability to track improvements over time would create a stronger incentive for long-term improvements by homeowners, as well as creating transparency for tenants on how their landlord is prioritising energy efficiency improvements.

The ability to track improvements over time would also support policy development and research, with trends and insights more easily identifiable.

Question 33: To what extent do you agree or disagree that Accreditation Schemes should be given more responsibility for overseeing the training of energy assessors	Agree
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Question 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?	
<p>Explain reasoning:</p> <p>The main improvement would be to improve the training of domestic energy assessors. The current length of the course is not sufficient to provide an adequate level of training, especially as there is a lack of hands-on time with retrofit materials e.g. insulation types, low carbon heating systems etc. Specific training on complex building-types should be more readily available to improve EPC accuracy.</p> <p>Utilising automated quality assurance of lodgements may improve EPC assessments. The current level of 2% of lodgements per 12 months being quality checked is too low. Peer reviews or third-party validation of higher-risk assessments may also support accuracy.</p>	

Question 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
Explain reasoning:	

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Question 36: To what extent do you agree or disagree that penalties should be increased?	Strongly Disagree/Disagree/Neither agree nor disagree/Agree/Strongly agree
Explain reasoning:	

Question 37: If penalties were to increase, how much should current penalties increase by?	Don't know/No increase/Inflation adjusted increase/Doubling/Other
Explain reasoning:	

Question 38: When should penalties be imposed for non-compliance with Energy Performance of Buildings Regulations (EPBR) requirements?	<ul style="list-style-type: none">• Don't know• At 6 months (no increase)• At 12 months• At 18 months• Following more than 18 months
Explain reasoning:	

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

Question 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
Explain reasoning:	

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Question 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
Explain reasoning:	

Question 42: What should be included in a redesigned report?	
Explain reasoning:	

Question 43: To what extent do you agree or disagree with the proposal to add a cost metric in the assessment methodology for ACIRs?	Strongly Disagree/Disagree/Neither agree nor disagree/Agree/Strongly agree
Explain reasoning:	

Question 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.	
Explain reasoning:	

Question 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.	
Explain reasoning:	

Question 46: Please let us know if you have any evidence on the rate of voluntary	
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implementation of recommendations made in EPCs.	
<p>Explain reasoning:</p> <p>Combined Authority’s Business Support Team experience of working with businesses is that, for the most part, they do not act upon the recommendations outlined within the EPC report. However, the introduction, and proposed tightening, of the Minimum Energy Efficiency Standards (MEES) regulations has had a notable impact over the past couple of years. This is largely driven by landlords concerned that their property(s) will become unlettable as EPC requirements are raised.</p> <p>For these businesses there is growing interest around what actions can be implemented to improve the EPC rating of their properties. For businesses that have implemented such measures a range of feedback has been encountered. (A) Surprise at some of the low-level improvements that could be made to improve their EPC rating (e.g. LED lighting, hot-water pipe lagging) - many businesses I speak to assume that large-scale building fabric upgrades will be needed to raise their building’s rating (e.g. internal/external wall insulation) (B) Concerns about the potential adverse impacts of making proposed improvements (e.g. certain insulation proposals that may lead to condensation issues) (C) Scepticism around the proposed costings/savings and suitability of measures provided within the recommendation report.</p>	

<p>Question 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>	
<p>Explain reasoning:</p>	

<p>Question 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>	
<p>Explain reasoning:</p>	