

February 2025



## Reforms to the Energy Performance of Buildings regime

Consultation response from The Housing Forum

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### About The Housing Forum

The Housing Forum is the UK's cross-sector, industry-wide organisation that represents the entire housing supply chain. Our growing membership drawn from over 150 organisations across the public and private sectors and includes local authorities, housing associations, housebuilders, architects and manufacturers. All share our determination to drive quality in the design, construction and decarbonisation of UK homes. They have a commitment to partnership working and share in our vision of 'A Quality Home for All'.

In order to achieve this, we have advocate for policy change needed for everyone to live in a good quality, sustainable and affordable home. Our key [Housing Solutions](#) set out how we think this can be achieved.

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## Summary

The Housing Forum broadly welcomes the proposed changes to EPCs. Since their inception in 2007, the use made of EPC ratings has grown significantly and these changes help to keep pace with this environment and ensure that EPCs remain fit for purpose.

The Housing Forum considers that there are three key property-based metrics that EPCs should contain:

- **Fabric performance:** assessing the thermal performance of a building
- **Smart readiness** – relating only to attributes of the property (ie not to things within it that would be removed if the property changed hands)
- **Estimated energy use – split by type of energy**

We would term these the **'primary metrics'** because they are fixed things that will only change when changes are made to the property.

There are then two metrics that are of key interest to occupants of housing, but which will vary with changes in energy prices or the carbon intensity of the grid:

- **Energy cost:** helping individuals understand the financial implications of a building's energy efficiency and make informed decisions about potential improvements
- **Carbon:** an estimate of the carbon emissions arising from the energy used in the building (this will be the single key one for non-domestic, for now)

Both of these 'secondary metrics' can be calculated from the primary metrics above, alongside other data (energy prices and the carbon intensity of the grid). EPC certificates can provide an estimate of both of these at the point that they are issued, but should note that they will change over the lifespan of the certificate.

EPC certificates should provide a link to an online calculator tool to facilitate an up to date estimate of the two secondary metrics.

**Regulation and funding eligibility that currently relates to EPC ratings should instead relate to one or more of the primary metrics.** This is important, because a property that complies with regulation or is eligible for funding should not cease to be so because of changes to energy prices or the carbon intensity of the grid.

We note that **heating system** is an additional metric proposed by Government. This may include useful qualitative information on the type of heating system, but more than one metric would be needed if it is to become a quantitative rating (distinguishing costs from carbon consumption).

We welcome the proposed reforms around enforcement and increased penalties for fraud in this area.

*We have responded just to the questions on domestic buildings, as the focus of the Housing Forum and its members is on housing.*

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# Response to questions

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

Professional body or institution

**Question 2. If you are responding as a member of the public/a building professional, what region are you responding from? [drop down list of England regions and other]**

UK-wide

**Question 3. If you are responding as a member of the public, are you a [checklist: private tenant, housing association/local authority housing tenant, private landlord, homeowner and other]**

N/a

**Question 4. If you are responding on behalf of a business/organisation, what is the name of your business/organisation? [free text]**

The Housing Forum

**Question 5. If you are responding on behalf of a business/organisation, where is your business/organisation based/registered? [drop down list of England regions and other]**

London

**Question 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:**

Response submitted by:

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**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.**

## **Domestic buildings**

- Neither agree nor disagree

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

The costs of heating a property are a key concern to occupants, but the ability of an EPC certificate to help people estimate their future bills is limited. This is because it is a measure based on average usage, which will in fact vary with lifestyle, etc, and also because energy prices change **after** a certificate has been issued, so it will go

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out of date, even if government updates the assumptions used in calculating energy costs at the time the certificate is issued.

An alternative approach would be not to put the estimated energy price on the certificate but instead to supply a link to a website that could calculate estimated energy costs based on up to date prices, using other information that is included in the EPC certificate (fabric performance, energy use, property size and location). This tool could also allow users to submit individual factors (such as temperature preference, or whether people are at home during the daytime) to receive a much more accurate estimate of their bills – helping people to make good choices between properties to buy or rent, or decisions over investment in energy efficiency measures.

As noted in the consultation - this metric is a volatile one that will go up and down as energy prices change. It is therefore vital that regulation (such as the proposed minimum C rating for private rented housing, or access to funding such as the Warm Homes Fund) are moved to a stable and building-based measure (such as the proposed energy usage) before (or alongside) any change to the energy cost metric that would cause properties' ratings to change. This is vital for landlords (especially social landlords managing large portfolios) to make good decisions on improving their homes.

**Question 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 agree

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

We are supportive of a fabric performance metric being included on an EPC certificate, as it gives a useful measure of energy efficiency and can provide the basis for recommendations on how best to improve the fabric performance of a property.

The Housing Forum considers that there are three key property-based metrics that EPCs should contain:

- **Fabric performance:** assessing the thermal performance of a building
- **Smart readiness** – relating only to attributes of the property (ie not to things within it that would be removed if the property changed hands)
- **Estimated energy use – split by type of energy**

We would term these the '**primary metrics**' because they are fixed things that will only change when changes are made to the property.

There are then two metrics that are of key interest to occupants of housing, but which will vary with changes in energy prices or the carbon intensity of the grid:

- **Energy cost:** helping individuals understand the financial implications of a building's energy efficiency and make informed decisions about potential improvements

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- **Carbon:** an estimate of the carbon emissions arising from the energy used in the building (this will be the single key one for non-domestic, for now)

Both of these 'secondary metrics' can be calculated from the primary metrics above, alongside other data (energy prices and the carbon intensity of the grid). EPC certificates can provide an estimate of both of these at the point that they are issued, but should note that they will change over the lifespan of the certificate.

EPC certificates should provide a link to an online calculator tool to facilitate an up to date estimate of the two secondary metrics.

**Regulation and funding eligibility that currently relates to EPC ratings should instead relate to one or more of the primary metrics.** This is important, because a property that complies with regulation or is eligible for funding should not cease to be so because of changes to energy prices or the carbon intensity of the grid.

**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.**

#### Domestic buildings

- HLP/HTC

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

The HLP/HTC is already well understood and provides a good metric to show performance that is directly related to the fabric. Adopting a new measure would create additional costs to the housing sector (including the affordable housing sector, which is already under significant strain).

**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

- Disagree

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

We are not clear what this would really add to the value of an EPC certificate that is not already covered under the carbon measure. There is a risk that newer or innovative heating systems would not be covered. Housing using communal heating systems, such as heat networks may be hard to assess, and housing designed to have very little need for heating (such as that built to Passivhaus standards) may be assessed as needing to upgrade heating systems that are in fact sufficient for its needs.

Consumers should be able to understand that energy cost and carbon emissions may differ (so, for instance, a heat pump may reduce carbon emissions but may not reduce costs). However, the proposed heating system metric seems to be trying to assess both costs and carbon in a way that may further muddy this issue.

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

See previous answer. If a heating system metric is used, it needs to be very clear as to whether it is assessing carbon intensity of the heating system or costs, Trying to provide a more holistic guide to choice of heating system is difficult in a single metric given differences in fuel availability and consumer preferences (particularly around being green or saving money). If multiple aspects of a heating system are being assessed, then multiple metrics will be required.

**Question 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**

- Agree

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

We support EPCs including measures of smart readiness where these are property-based and are things that the occupant or landlord can change. This is likely to be more limited for flats than for houses. They should also be limited to things that can be readily assessed by an EPC assessors, such as EV charging points.

It should include only things that would remain in the property if it were to change hands and should therefore exclude most domestic appliances. There are already good systems of labelling most domestic appliances for their energy efficiency and there is no need to consider these as part of a property, when they can be removed from it.

EPCs should not reflect things that are not property-based such as the current electricity tariff. It also needs to be clear on how to treat any communal or shared energy systems.

We are not sure that this should be a headline metric for domestic properties.

**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**

- Strongly agree

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

Please see answer to Q2.

Energy use is a key measure that would be valuable to built environment professionals, including landlords and those undertaking works to improve a building.

It is important that this metric splits the estimated energy by fuel type (gas, electricity, oil, etc) in order that the figures can provide the underlying information to calculate or

to update both the energy cost metric and the carbon metric. Both the energy cost and carbon metric are “live” measures that will fluctuate based on energy prices and the carbon intensity of the grid. But the underlying energy usage metric should remain static if there are no changes made to a property. It is therefore a key metric.

**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**

- Other (please specify)

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

Total Energy Use should be used as the headline metric here (though note above that this needs to be split by fuel type). Delivered energy fails to account for energy generated on-site.

**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

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

Carbon usage is a key metric that should be the focus of efforts to decarbonise housing. There are challenges with it – firstly that for properties with electric heating in particular (including heat pumps), it will change as the grid decarbonises. There would therefore be value in displaying the estimated carbon usage currently, and likely carbon usage in, say 5 years time (ie halfway before an EPC becomes due for renewal). Any carbon savings from installing energy efficiency measures could be displayed this same way, which would help incentivise the move to low-carbon heating systems.

It may be difficult to assess the carbon emissions of a communal heating system such as a heat network when providing an EPC for an individual property. Government should work with industry to ensure that estimates for the energy consumption and carbon emissions from a communal heating system are as accurate as possible.

An online calculator tool could also allow people to calculate the carbon usage of a property based on the core property-based indicators around energy usage, updated to reflect the current carbon intensity of UK energy sources.

**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.**

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## Domestic buildings

- Neither agree nor disagree

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

This has the potential to reduce the performance gap between the EPC and real-life expectancies. It would need to be assessed by competent assessors and the costs of adding this in need to be carefully assessed to ensure that EPCs do not become too onerous and costly especially for social landlords who may need to undertake large numbers of them.

We are, however, concerned about the costs of requiring this assessment as standard for all EPCs. One option may be to allow the option of a higher-standard EPC certificate that has incorporated smart meter real-world data – this would be particularly useful for properties that are being considered for significant investment, as this would help ensure that resources are well-directed.

### Question 12: Do you have any views on key transition issues?

#### There are several key issues around transition that need to be addressed:

- 1) The proposed new measures mean that users of EPCs have a choice of measure – they could target their grants or regulation on the basis of carbon emissions or energy costs (or potentially on fabric performance or heating type). **This will require them to have clarity on whether their ambitions are around fuel poverty or carbon savings.**
- 2) Government should provide a clear route map to the changes and to discuss this with all agencies who use EPCs for regulatory purposes.
- 3) Agencies providing grant funding on the basis of EPC ratings (such as the Warm Homes Fund) need to be clear as to whether an old EPC is sufficient or whether a new one is required. Councils will need advice to cover schemes that they administer.
- 4) Agencies providing grant funding on the basis of EPC ratings (such as the Warm Homes Fund) need to be clear on which of the several metrics contained in new EPCs determine eligibility.
- 5) Government should be clear on the treatment of private rental properties that meet the MEES currently but fail to do so under the new rules.
- 6) It is essential that grant funding (such as the Warm Homes Fund) already allocated on the basis of properties' EPC rating remains in place. If a property has the work undertaken as planned but does not reach the required rating under the new system (but would have done so under the old one) there should be no penalty or repayment of grant required.
- 7) Government should assess the likely impact of the new system on the number of homes that fall into different bands, or become eligible for grant funding or non-compliant with MEES and ensure that grants are sufficient to cope with any increase in demand.

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- 8) Requiring an EPC before advertising a property for sale or let should come into effect a few months after the introduction of the new system, to avoid the risk of a shortage in assessors familiar with the new system or IT glitches causing a hiatus in the property market.

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

- 10 years

Given the multiple uses of EPCs and the fact that it is not a legal requirement to have one in place at all times, it is questionable whether a fixed expiry date is really needed, or whether instead the acceptable age of an EPC could be specified separately by each agency using the rating.

If a fixed date is required, an EPC certificate should be valid for 10 years, but agencies who use EPCs for different purposes (such as grant allocation) should be free to require that one has been issued more recently if they wish.

Providing access to a portal for occupants and landlords would allow the core data on older EPCs (around fabric performance, heating type, etc) to be used to generate up to date estimates of costs or carbon intensity based on up-to-date energy prices and the carbon intensity of the grid.

Requiring a new EPC to be undertaken at the end of any improvement works could also be a condition for government grant funding or as part of the sign-off for improvements that required building regulations approval.

Digitalising the system with open-access data should allow EPCs to be updated more efficiently. An EPC certificate should become automatically invalid once an updated one has been undertaken (This requires use of the Government's portal at all times and no storing of PDF EPCs anywhere).

A much shorter validity period for EPCs as standard would impose significant additional costs on both social and private landlords, especially as the cost of an EPC is likely to be higher given the increased complexity that is proposed.

**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?**

- Disagree

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

We would support the validity remaining at 10 years, as standard, so this does not apply. However, if the government does set a shorter lifespan for EPCs it should apply to older ones too – as they will be inferior to the new ones. It would seem very strange if a property issued with an EPC under the new, improved, rules, required a new one sooner than one issued under the old system, just a few weeks previously, and creates a potential situation where a property could have an old EPC issued in 2025 (valid until 2035), get a new one in 2027 which expires even though the older one is still technically valid.

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**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?**

- Disagree

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

There seems little value in this if the building has not changed and nor has its owner or occupant. A property that was compliant with MEES at the point that it was let is not likely to have suddenly become non-compliant (assuming that MEES is assessed against one of the property-based metrics and not against energy costs).

Private rental housing typically relet every few years, so most certificates are likely to remain valid, at least under the current 10 year lifespan. However, if the government does decide to give them a shorter period of validity, then there may be situations where a low income tenant wishes to apply for Warm Homes Funding administered by councils that require a valid EPC. In these situations it might be possible either for councils to accept an old EPC or to require the landlord to get a new one.

We would suggest that a new EPC could be required for properties that receive government grant to improve their energy efficiency, including private rental properties.

**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?**

- Strongly agree

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

EPCs cannot serve their intended purpose of helping inform buyers and renters if they are not available at the point of reading the information about the property. Rental properties in particular can be advertised and let extremely quickly, and in some property markets prospective buyers will be having to put an offer in quickly to succeed.

Landlords and sellers should be allowed to commission an agent and prepare the property for advertising while waiting for the EPC, but should be required to have it in place before it is advertised.

This is one area that should be considered in the transition plan, as it may be sensible to bring this requirement in a few months after the new EPC system has come into place, in case there are delays with finding skilled assessors in the early days.

**Question 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

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

This seems sensible in relation to HMOs and is closing a loophole that served no purpose. It is less obvious whether it should also apply to a homeowner renting a room in their house to a lodger and (who is likely to have the bills included in their rent), and government should be wary of creating any additional barriers to encouraging householders to let rooms to lodgers.

**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

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

**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

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

This would help ensure a level playing field between landlords and providers of holiday lets, reducing the incentive on landlords to let to short term tenants, though simply requiring a valid EPC is a very minimal measure. A common framework for the minimum energy efficiency standard (as is being consulted on separately) would help much more to level the playing field. The forthcoming Renters Rights Bill is already increasing concerns that landlords may choose to let their accommodation on a short-term basis, reducing the supply of much-needed homes to rent.

**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

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

See previous answer. It would be unusual for a short-term let to place the responsibility for bills onto the occupier. The ambition to reduce carbon emissions should also be reflected on all building types, regardless of who pays the bills.

**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?**

- Strongly agree

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

Tenants, buyers and landlords of heritage properties should have a good understanding of the carbon emissions and costs associated with such properties. It is also vital for researchers and policymakers to understand these costs, so that the right balance between heritage and energy efficiency can be struck.

When making recommendations for improvements EPCs should note which things may not be permissible within the current legislation, or would require consent. Property owners should be directed to advice to gain consent for improvements where this is required.

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

No response, as this does not relate to domestic properties

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

No response, as this does not relate to domestic properties

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

No response, as this does not relate to domestic properties

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

No response, as this does not relate to domestic properties

**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.**

No response, as this does not relate to domestic properties

**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.**

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

- Neither agree nor disagree

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

We are not aware of any need for this data by professionals working across the housing and built environment sectors, and there is benefit to cleaning up outdated data. However, there may be value to researchers evaluating the success of measures to improve the housing stock, so it may be necessary to retain the archive for use on application.

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**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?**

- 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

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

Data sharing would help efforts to drive down emissions and measure the impact of efforts to improve energy efficiency. There is no personal data contained in EPCs.

**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?

- Strongly agree

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

We agree with this proposal. If the government does not go ahead with it for some reason, then it is particularly important for social landlords to be able to access data relating to their own stock, in full and in real time via the database.

**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

The data gathered in previous EPC assessments should be available to future EPC assessors, but they should remain responsible for ensuring that any data they submit (including that provided from previous EPCs) is correct. It is the property-level data that should be shared and not anything relating to the occupant (such as the details of the person who commissioned the EPC).

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

The cost of an EPC is an issue, that needs to be balanced against the need for accuracy. Using data from previous EPCs has the most potential for newer properties where data from the full SAP should be available. The assessor should remain responsible for ensuring that any data they submit (including that provided from previous EPCs) is correct.

**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?**

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- Agree

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

Training is key to ensure energy assessors are fully equipped to undertake an accurate assessment. This will be important as the new system is introduced. When there are future changes in building regulations or other relevant legislation, assessors should be required to complete short online training modules to ensure they understand them.

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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?**

The Government should oversee randomised auditing of lodged certificates in order to check for competency of assessors, and problems are identified the assessors involved should be required to undertake additional training. For more serious or repeated failures, accreditation should be removed. This is of growing importance given the increased reliance on EPCs and large amounts of money that may be at stake (with private landlords, for instance, liable for up to £15,000 of expenditure if their property does not achieve a C rating).

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

- Strongly agree

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

The private rental database, as proposed under the Renters Rights Bill should help with enforcement in the private rental sector.

Promoting the benefits of EPCs to improving energy efficiency to estate and letting agents is unlikely to be sufficient and stronger enforcement will be needed particularly on the requirement to have a certificate available when advertising a property.

**Question 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.**

The fines should be sufficient to deter potential gains to fraudsters from issuing false EPCs. When EPCs were purely informative, the potential gains from fraud were lower and a smaller fine was appropriate. Now that landlords may be required to invest up to £15,000 in improving a property or homeowners access grants of up to £15,000 the stakes are much higher so the need for deterrence has grown.

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

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- Other

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

See previous answer – there is a need to both increase the fines by inflation to make up for the years when they have been frozen, and to increase them significantly to reflect the growing financial incentive for fraud in this area. The maximum penalties should be used for cases of fraud or gross incompetence and not for minor errors.

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

- At 18 months

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

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

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We are concerned that local authorities' budgets are very stretched and they lack the capacity to enforce the regulations. Additional ring-fenced funding is needed here, alongside free training and support for councils in effective enforcement.

**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?**

- Neither agree nor disagree

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

No response

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

No response

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

No response

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

No response

**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.**

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No response

**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.**

No response

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

No response

**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?**

People on low income are more likely to live in energy-inefficient homes and to be in fuel poverty. Improvements to EPCs should help government support this group to be better targeted. The focus on the private rented sector will help young people (assuming landlords absorb the costs, and do not sell up), though we note that there are no measures included here to encourage EPC update among the group who are most likely to live in homes with poor energy efficiency – which is older homeowners who have not moved house recently.

**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.**

The impact assessment's costs for landlords or compliance with the MEES mentioned in the impact assessment are out of date and do not tie in with the proposals to raise the MEES to a C.

There is no assessment of the additional costs for social landlords, particularly if the validity of an EPC is reduced. The impact of additional costs on social landlords, if not funded by government, will fall on social tenants via reduced services. Social tenants are typically poorer than people in other tenures.

There is no estimate of the cost of producing an EPC to the new standards included in the impact assessment.

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