

Improving the energy performance of buildings regime

December 2010

Northgate Public Services response

Introduction

Northgate Public Services welcomes the opportunity to provide views on how to improve the energy performance of buildings regime.

Our response draws upon our experience of working for over fifteen years in innovative partnerships designed to promote energy efficiency and develop sustainable communities, as well as working with a range of stakeholders in the field of energy efficiency including local authorities, surveyors, architects and most recently domestic energy assessors.

We believe passionately that action must be taken to combat climate change and welcome the Government's desire to co-ordinate the operation of the energy performance of buildings regime with the Green Deal.

General Comment

Climate Change is one of the biggest challenges facing the world. The Government has set a target of reducing overall carbon emissions by 80 per cent by 2050. For this to become a reality, the Government – and all of us - will have to put behaviour change at the forefront of its policy.

We have long argued that the regime should have a more coherent, streamlined, simplified and consistent system for measuring the energy performance of buildings so that is easy for consumers to understand and to act upon relevant information.

At the moment, we believe that domestic legislation relating to the European Performance of Buildings Directive (EPBD) is geared to implementing the European Directive rather than setting broad policy objectives. For example, there are extreme restrictions on data access in relation to Energy Performance Certificates (EPCs) that undermine energy efficiency objectives.

We firmly believe that EPCs and Display Energy Certificates (DECs) have an important role to play in supporting carbon reduction aims. These certificates provide vital information about the energy efficiency of buildings in England and Wales and advice about measures to improve their energy performance. As such, they are essential to promoting both energy measures and positive behaviour change. However, the information they provide must move beyond being simply an academic source, and be used to instigate practical action

We believe that the data that exists should be made more widely available to inform energy saving initiatives. For example, information that is already held on recommendations and ratings could be mapped out to identify pockets of poor energy efficiency that can then be used to identify where investments should be targeted.

Local Authorities are ideally placed to promote energy efficiency in their local communities. We have campaigned for them to be given stronger powers in relation to energy efficiency and believe that this should be considered within the wider context of the Energy Security and Green Economy Bill.

We support the measures outlined in the Green Deal, but believe that Government should consider how it can strengthen other means of funding energy efficiency such as green mortgages. It should also be supported by wider measures that make practice energy efficiencies accessible to all, including those who are most disadvantaged in our communities.

Specific Comment

The content, format, accessibility and coverage of EPCs and DECs, and the extent to which consumers act on their recommendations

For EPCs and DECs to be a driver of behaviour change and action, it is essential that their content, format, accessibility and coverage are conducive with this approach.

In our experience, consumers have been unaware or disappointed by the fact that EPCs are not specific to their own property, but rather offer an average rating of a typical property similar to their own. The EPC is not a certificate of “their house” it is an average rating of a typical property.

To promote behaviour change further, it may useful to consider the use of ‘mini DECs’ for properties and small buildings which show how efficient a property actually is in comparison to the potential of the property as shown on an EPC.

Energy Performance Certificates could also be further improved by adopting a similar approach to that of the Scottish EPC format which contains a specific summary of recommendations on the first page. At the moment they are at the back of the report.

We also strongly believe that there should be a shorter validity period for EPCs.

How effectively EPC and DEC assessments are conducted, both in terms of the practical process and methodology used by assessors while on site, and the underpinning calculation methodologies and software they employ

Most of the points that we have raised in the specific comment above are relevant to this question. It is only the DEC that is specific to the actual property and the fact that the EPC is not leads to disappointment or confusion for consumers.

Where inconsistency applies between different software, this is most commonly due to the fact that different data has been inputted e.g. where specific boiler data or general boiler data is used.

The Convention Group has a key role to play in improving practice so that all assessors follow the same decision-making process while on site to ensure that data is comparable. This is essential to promoting greater public trust.

There is an argument that further user elements could be added to the measurement system which would make the result more specific to the home owner. For example, where the floor area supports five people but the property is occupied by two people the energy usage could be adjusted to better reflect the actual current usage. The consumer could be given the EPC result and the adjusted result. As we have discussed above, introducing some form of domestic DEC as well as the EPC would show the consumer both building efficiency and current energy usage.

The adequacy of the existing qualification and accreditation arrangements for energy assessors, and whether the current numbers of assessors matches the likely future demand for EPCs and DECs

The way in which EPCs and DECs are currently produced via accredited assessors is highly regulated. It is audited but the results of the audit are not made publicly available. There are strong arguments for ensuring that these audits are made available to the public on the grounds of transparency.

Advice is currently delivered through multiple channels. It is important that future plans ensure that advice is streamlined for consumers to understand.

We have also argued for an extension of the current EPC and DEC regime, for example, for holiday lets and Houses of Multiple Occupation (HMOs), and in that context believe that the current number of assessors would be able to meet future demand.

How effective the quality control and assurance arrangements are in ensuring the production of high quality EPCs and DECs consistently across the country and, in particular, the performance of the accreditation schemes and auditing processes

Quality control and assurance is key to public trust. We are concerned that the introduction of the new Scheme Operating Procedures has undermined the quality assurance process which has become, to some extent, a number chasing exercise rather than focussing on genuine quality control issues. As we have discussed above, we believe that the auditing process should be made more transparent to help build public trust.

How effective the current provisions are for ensuring compliance (and for enforcing against non-compliance) with EPC, DEC and air conditioning inspection report requirements

We strongly believe that we need a more robust enforcement regime. The current scheme is ineffective due to the ambiguous nature of who is responsible for ensuring that the certificate is produced.

This is exacerbated by a need to ensure that Trading Standards have powers to enforce legislation that are proportionate and effective.

The provision of the 'due diligence' defence seems inappropriate and excessive.

The power of enforcement should be given to any local authority officer enabling local authorities to incorporate checks into the existing workloads of individual officers.

What scope there might be for making better use of EPC/DEC data to support the initiatives of public and private organisations to reduce carbon emissions from buildings

As we have stressed before, the information contained with EPCs and DEC's is invaluable. This data could be mapped out to show ratings and recommendations by postcode which, in turn, could help identify which areas would benefit from a specific measure and help target investment.

It could also be used more effectively to tackle the problems of fuel poverty and environmental inequity in which poorer households not only live in less energy efficient properties but also pay a higher proportion of their incomes to stay warm.