

CONSULTATION RESPONSE



Making better use of EPCs and data: Consultation

25th May 2010

HBF response: Making better use of Energy Performance Certificates (EPCs) and data

The Home Builders Federation welcomes the opportunity to respond to the consultation on “Making better use of Energy Performance Certificates and data”.

The Federation is the main trade association representing private sector home builders in England and Wales. Our member companies range from large national firms to regional and smaller local companies. Between them our members construct some 80% of the new homes built each year.

Our major area of interest in relation to the issues raised in the consultation concerns Chapter 5 - Energy performance certificate ratings in property advertisements.

On this, we understand the Government’s wish to move at an early stage to implement a requirement for all advertisements for properties for sale or rent to include the EPC rating and note that this will in due course become a legal requirement as a result of the Recast of the Energy Performance of Buildings Directive.

In principle, home builders recognise the prospective benefits of including the EPC rating in advertisements, but we believe that more thought is necessary at this stage on precisely what form of representation of the rating would be most appropriate. The consultation document points out some of the issues, which include the accessibility and meaningfulness of ratings to customers and the implications for advertising space and cost. Consideration also needs to be given to the rapid evolution of communications technologies and the means used for advertising properties.

It is in practice difficult to reach firm conclusions on the best option(s) without undertaking substantive market research, so taking all these factors into account we think the next step might be to conduct some voluntary market trials to gather feedback from all parties concerned, including consumers, before reaching final decisions on the best way forward for a future mandatory requirement. We would be interested in the Government's view on such an approach.

A further thought is that it might be possible to link any such trials with the work being undertaken by the Zero Carbon Hub on the marketing of future low carbon new homes.

On Chapter 2 - Making better use of energy performance data, we see no major issue for home builders, but we wonder whether consideration might need to be given to the possible need to bring the potential access arrangements for a property's EPC to a purchaser's attention. This is not a point raised in the consultation document, but we would suggest that it should be weighed in the balance in determining final arrangements for possible EPC data access arrangements.

We have no other substantive comments on the issues raised in the consultation.

John Slaughter
Director of External Affairs

