# Historic England's response to the MHCLG and DESNZ consultation: Reforms to the Energy Performance of Buildings Regime

## Section 2 – What EPCs measure

**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 and Non-domestic buildings (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England thinks an energy cost metric should be displayed on EPCs, but that they should be altered from their present form. The Climate Change Committee suggests complementing EPC ratings with additional policies to enhance energy efficiency and promote low-carbon heating. An energy cost indicator, such as energy cost intensity (£/m²/yr), would provide clarity on overall energy expenses and help meet fuel poverty targets. This would also encourage measures to reduce energy bills and align with policies that prevent worsening ratings.

Using a cost metric as a primary rating for EPCs does have some limitations. Prices do not directly reflect a building's physical characteristics, which is what the EPC is designed to evaluate. Strategies to reduce overall energy consumption without altering the existing fuel will invariably result in lower energy costs. Conversely, initiatives that entail a fuel change, which is essential for reaching net-zero targets, may not always guarantee reduced operational expenses at the time of installation.

Therefore, if a fuel cost metric is to be employed, it must be dynamic and incorporate current fuel prices to reflect actual fuel consumption accurately. The Centre for Research into Energy Demand Solutions (CREDS) explains that existing EPCs rely on outdated fuel price data, which can result in recommendations for high-carbon heating solutions – additionally, it is essential to consider both cost and carbon emissions to promote the adoption of electric heating over fossil fuel-based options by utilising updated fuel prices.

**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 and Non-domestic buildings (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England supports providing this information which, if accurate, may support both domestic and non-domestic sectors in making informed decisions on the most worthwhile and appropriate energy efficiency measures to consider, while ensuring occupant health is maintained and not impacted.

The methodology that underpins this and training of Energy Assessors require improvement. Where historic buildings and those of traditional construction are being assessed, it is particularly important to ensure the competency of and capacity among assessors, and to reduce assumptions and improve the accuracy of data used. This will reduce the risk of inappropriate or less-than-effective recommendations being put forward.

Potential fabric performance improvement metrics and recommendations must be embedded in a whole building approach to deliver both improvements in thermal performance, and cost and carbon savings, while avoiding increased moisture and overheating risk to both occupants and fabric, ensuring deterioration of fabric is not exacerbated, and that efficacy and durability of interventions are maximised.

Maintenance needs, thermal comfort, ventilation, air quality, and climate change risk must all be factored in. The introduction of more accurate data needs to be balanced with keeping EPCs affordable and accessible – one method to achieve this would be to introduce EPCs with different ‘confidence ratings’ or 'levels'. A robust methodology should be created with wide stakeholder engagement, and Historic England is committed to supporting the development of this approach. If this is to be included as part of the certificate, it should be caveated that this information is to the best of the assessor's knowledge and should not be used to design energy efficiency measures or low/zero carbon heating systems, as this would require further professional input.

**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 and Non-domestic buildings (No preference - Don't know - FEES - HLP/HTC - Other). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Don’t know

Incorporating the most accurate and holistic calculation of fabric performance is critical. Whichever methodology is chosen must be robust, accurate, and holistic, for example, by including as much in-situ measurement as possible alongside calculations and consideration of solar gains and future overheating risk, which is an ever-increasing risk to occupant health.

**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 and Non-domestic buildings (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England agrees that a heating system metric should be displayed for both domestic and non-domestic buildings. Heating systems are a major factor in a building's energy consumption and operational carbon emissions, and so we agree that this information should be displayed. However, as elaborated on in our answer to Question 5, it is only worthwhile including this information if the metric is well-considered and reflective of the heating system's environmental performance.

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

The environmental and sustainability considerations of a heating system should go beyond operational carbon emissions and include the embodied carbon. This is so that the actual

environmental impact is reflected in the metric. The building users would also benefit from understanding the capital and operational costs of the heating system options but this may be beyond the scope of this energy performance reform. For example, the proposed hierarchy would place direct electric heating above fossil fuels for environmental reasons, however the running costs for direct electric heating are higher.

**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 and Non-domestic buildings (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

Historic England takes the position that there are benefits to displaying carbon-based metrics on EPCs. Such a metric might incentivise people to tackle their emissions, and the metric could help to identify areas requiring further financial support to retrofit. However, this metric also comes with drawbacks, and if it is included, it must be robust. Another alternative might be to incorporate it into the other metrics.

One barrier is created by measurement – the validity period of the EPC will not align with fluctuations in known emissions and cost, particularly as emission factors vary each year. Another challenge could be that some people (such as tenants or those in rural areas) lack a choice as to how their home is heated, and so a carbon metric that flags a high level of emissions from a property and lowers the EPC rating could create issues, e.g., if mortgages are offered based in part on EPC ratings. Additionally, one could question how useful the metric will be in certain buildings, as most large and public-facing organisations will be calculating their carbon emissions already with their own verified methodologies and factors for conversions.

To tackle these problems, if a carbon-based metric is included on EPCs, it should be clear, supported by a reliable methodology and accurate data, and broken down in a way that allows comparison to in-house emissions. This will provide greater clarity and avoid confusion when stakeholders and partners are interpreting their emissions.

Alternatively, rather than having a distinct carbon metric, perhaps the 'environmental value' of this metric can be suitably incorporated into others and have the same impact. For example, the heating system metric that promotes low-carbon heating should have the effect of lowering operational emissions from buildings, which is the intended outcome of a carbon-based metric.

**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 and Non-domestic buildings (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

Incorporating smart meter data within EPCs has the potential to help achieve the goal of making EPCs more accurate, reliable, and trusted. However, Historic England notes that there are challenges associated with facilitating this for rural communities, off-grid properties, and those with poor internet connectivity. The introduction of SMETER data needs to be balanced with keeping EPCs affordable and accessible, and one method to do this would be to introduce EPCs with different 'confidence ratings' or 'levels'.

**Question 12 – Do you have any views on key transition issues?**

Historic England wishes to raise a point about training – any change in approach to energy assessment needs to be matched with a change to the required training and qualification process for those undertaking assessments. The National Occupational Standards (NOS) which underpin the current training provision for energy assessors should be updated to ensure that they meet the requirements of the reformed regime. Assessors should be subject to ongoing requirements for training (such as a CPD programme).

## Section 3 – When EPCs and DECs are required

**Question 13 – What should be the validity period for Energy Performance Certificate (EPC) ratings? (Don't know - Less than 2 years - 2 years - 5 years - 7 years - 10 years)**

Don’t know

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England agrees with the reasoning behind this question. However, validity periods should not be reduced beyond the capacity of the sector to facilitate and quality-assure the associated regularity of reassessment. The introduction of more trigger points would be a more robust and feasible method. In general, EPCs should be valid as long as there is no significant change to the building fabric or services, but they should be renewed over shorter timeframes when significant changes have been carried out. If any changes are introduced, a staged approach should be provided for any changes to give the sector time to respond and build competent capacity.

Additionally, with respect to potential negative impact on historic buildings and/or buildings of traditional construction, it is imperative that heritage building exemptions remain in place until the current tools for assessment (EPC and SAP), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed prior to these changes being implemented. Historic England also recommends changes to the wording of exemptions, as outlined in our response to Question 21.

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England agrees that EPCs should be valid as long as there is no significant change to the building fabric or services, or until their expiration.

Additionally, with respect to potential negative impact on historic buildings and/or buildings of traditional construction, it is imperative that heritage building exemptions remain in place until the current tools for assessment (EPC and SAP), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed prior to these changes being implemented. Historic England also recommends changes to the wording of exemptions, as outlined in our response to Question 21.

**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 Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

Historic England recommends that a staged approach is provided to give the sector time to respond and build competent capacity to ensure that robust and accurate EPCs can be provided for buildings to be sold or rented.

Additionally, with respect to potential negative impact on historic buildings and/or buildings of traditional construction, it is imperative that heritage building exemptions remain in place until the current tools for assessment (EPC and SAP), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed prior to these changes being implemented. Historic England also recommends changes to the wording of exemptions, as outlined in our response to Question 21.

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

Historic England has concerns over sector capacity to deliver EPCs for such properties, especially considering the current MEES consultation where there is risk involved in the large number of additional properties anticipated to need EPCs and alterations. If implemented, Historic England recommends that a staged approach is adopted to give the sector time to respond and build competent capacity to ensure that robust and accurate EPCs can be provided for properties to be let.

Additionally, with respect to potential negative impact on historic buildings and/or buildings of traditional construction, it is imperative that heritage building exemptions remain in place until the current tools for assessment (EPC and SAP), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed prior to these changes being implemented. Historic England also

recommends changes to the wording of exemptions, as outlined in our response to Question 21.

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

Historic England has concerns over sector capacity to deliver EPCs for such properties, especially considering the current MEES consultation where there is risk involved in the large number of additional properties anticipated to need EPCs, as well as those properties where there have been significant changes to the building fabric or services. If implemented, Historic England recommends that a staged approach is provided to give the sector time to respond and build competent capacity to ensure that robust and accurate EPCs can be provided for properties to be let.

Additionally, with respect to potential negative impact on historic buildings and/or buildings of traditional construction, it is imperative that heritage building exemptions remain in place until the current tools for assessment (EPC and SAP), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed prior to these changes being implemented. Historic England also recommends changes to the wording of exemptions, as outlined in our response to Question 21.

**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 Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Strongly Disagree

Improving the energy/carbon efficiency and climate resilience of historic buildings and/or buildings of traditional construction through retrofit measures and protecting their unique qualities are compatible goals. Historic England supports the development of improved regulations and standards for historic buildings and/or buildings of traditional construction, to ensure that appropriate energy efficiency improvements are made to all buildings while ensuring that they are also resilient to climate change hazards, such as flooding and overheating.

We support the aim of historic buildings and/or buildings of traditional construction (referred to as 'heritage buildings' in this consultation) having EPCs, facilitated by the eventual removal of associated exemptions. However, Historic England strongly believes that exemptions should remain in place until the tools for assessment (currently EPCs underpinned by their Standard Assessment Procedure (SAP) methodology), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed with respect to heritage buildings.

As noted in the consultation, getting an Energy Assessment and the resultant Energy Report and Certificate are non-invasive and so do not 'alter the building's character' or cause harm to building fabric or occupants. However, Historic England recommends that EPCs are reformed before exemptions are removed because EPCs in their current form might recommend measures that are inappropriate for heritage buildings. Such measures risk causing detrimental impacts on significance and historic fabric and may negatively impact occupants' health and building performance. The pressure to undertake inappropriate 'recommended measures' suggested in an EPC certificate is being intensified by Minimum Energy Efficiency Standards (MEES) compliance. However, it is also essential to prevent heritage buildings becoming 'stranded assets' if they do not meet the existing or any future minimum energy efficiency standard.

Therefore, Historic England strongly believes that improvements are needed prior to the removal of exemptions, which will allow heritage buildings to be retrofitted appropriately and in the best interest of both their historical significance and the health and comfort of their occupants.

Additionally, the existing exemption wording has led to misunderstanding and test mechanisms are unclear. To clarify this, Historic England proposes the following revised wording:

“Buildings protected as part of a designated environment or because of their special architectural or historical merit are required to have an energy performance certificate. These can include buildings protected as part of a designated environment or because of their special architectural or historical merit (e.g. listed buildings [footnote 2] or buildings within a conservation area). However, they may be exempt from implementing the ‘recommended measures’ suggested on a Certificate insofar as compliance with minimum energy performance requirements would unacceptably alter their character or appearance.

Building owners should consult with a competent heritage professional to establish whether proposed ‘recommended measures’ would unacceptably alter the character or appearance of a building and identify where more appropriate measures may be feasible and practicable. Where necessary, consents should be sought from the local authority.”

Furthermore, Historic England is keen to be involved in the ‘industry group’ proposed in the consultation to ensure that effective solutions for heritage buildings are implemented.

Finally, regarding the ongoing consultation ‘Improving the energy performance of privately rented homes: 2025 updates’, the proposed MEES should recognise and align with the wording in Approved Document L, which would allow an acceptance threshold where appropriate works can be reasonably and practicably undertaken. This means that any work should comply with the standards to the extent that is reasonably practicable where this would not unacceptably alter the dwelling’s character or appearance. The energy efficiency of heritage buildings should be improved only if doing so will not cause long-term deterioration of the building’s fabric or fittings. This particularly applies to heritage buildings with a vapour permeable construction that both absorbs moisture and readily allows moisture to evaporate. Examples include those built with wattle and daub, cob or stone, and constructions using lime render or mortar.

**Question 22 – How useful do you find Display Energy Certificates (DECs) for understanding and improving a building’s energy performance? (Not at all useful - Somewhat not useful - Neither not useful or useful - Somewhat useful - Very useful)**

Not at all useful

**Question 23 – Are there any limitations or challenges with the current DEC approach that reduce its effectiveness? Please provide evidence where possible.**

The benchmarking categories within the OrCalc software for the heritage sector are too limited and need to be expanded like other sectors – data is now available to make this possible. The accompanying advisory report is generic and not very helpful. Within Historic England, they have been a compliance exercise, not a tool to drive energy efficiency. Historic England has not used the DECs in planning energy efficiency improvements to our buildings, and while our Certificates are in public places, we have had no communication from the public about them or the rating.

**Question 24 – What alternative approaches, if any, could drive energy performance improvements more effectively than DECs for public sector buildings? Please provide evidence where possible.**

There are typical benchmarks to achieve on the DEC, but if the benchmarks in the OrCalc software are not relevant to the building or its usage, they are not meaningful and useful. Historic England has found that the Display Energy Certificate and the accompanying Advisory Report are not helpful for managing and reducing energy usage, and rather that it is simply seen as a compliance activity to complete.

Considering the heritage sector, the benchmarking categories in ORCalc software for cultural activities (broken down into Art Gallery, Art Centre, Library, and Museum) have been the same since 2009 and are not useful. At the time when the software was being developed, the sector did not have enough good quality data unlike other sectors to produce more benchmarks, but data is now available to break these groupings down into more useful and meaningful categories.

Additionally, Historic England disagrees with the proposed changes to the validity periods for DECs and DEC recommendation reports. Since the change is only in the time period, not in how useful the DEC and Advisory Report are, Historic England's view is that these tools would still be seen as a compliance exercise and not a means for driving energy efficiency.

**Question 25 – To what extent do you agree or disagree with the proposed changes to the validity periods for DECs and DEC recommendation reports? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree)**

Disagree

## Section 4 – EPC and DEC data

**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. (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

**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 Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree).**

Neither agree nor disagree

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Neither agree nor disagree

**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. (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Agree

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree).**

Agree

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

Historic England agrees to the use of previous EPC data on the basis that this only relates to new EPCs using the new Home Energy Model (HEM) approach. The use of existing validated data would enable the more regular and dynamic update of EPCs as and when changes are made to a building. There are risks associated with the use of existing data if it is of poor quality or not validated. It must also be taken into consideration that the hygrothermal dynamics and condition of building materials are not static – they will change over time due to decay and/or emerging understanding of performance and impacts caused to internal environments by our changing climate. For newer constructions as with existing buildings, there is no guarantee that the detail and construction on site is the same as that submitted to building control. To overcome this risk, only data from existing EPCs should be used once reforms to improve their quality have come into effect.

**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? (Strongly Disagree - Disagree - Neither Agree nor Disagree - Agree - Strongly Agree). If you wish, please explain your reasoning, and provide any evidence to support your view.**

Disagree

Appropriate consideration needs to be given to the level of training required for energy assessors, given the added complexity which reforms to the Energy Performance of Buildings regime will bring to the role. Energy assessors, and the other roles involved with retrofit, would benefit from having a strong professional body with rigorous qualification and CPD requirements for accreditation, on the model of organisations like RICS, but commensurate with the level of responsibility required for the role.

## Section 6 – Air conditioning inspection reports

**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).**

Neither agree nor disagree

**Question 42 – What should be in a redesigned report?**

Historic England would support the redesign if it were likely to improve compliance and energy performance, and suggests that the report should consider the refrigerant charge, the global warming potential of the refrigerant, and a review of the recharging log to fully understand and quantify the fugitive emissions.

Additionally, Historic England neither agrees nor disagrees with the proposal to add a cost metric in the assessment methodology for ACIRs because while this could incentivise repairs and maintenance, the advised costs may not correspond well to specific installations.

**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).**

Neither agree nor disagree