

Improving the energy performance of privately rented homes in England and Wales

Question 1: Do you agree with government's preferred position of using new Energy Performance Certificate (EPC) metrics following EPC reform as the basis for higher minimum energy efficiency standards (MEES) for privately rented homes?

Agree.

Yes, providing that it remains clear and simple for both landlords and tenants to understand how to meet the standards. Additional resources/training for local authority officers who are responsible for MEES enforcement will be needed to understand the new metrics and how to enforce them.

Question 2: Government would welcome views on options for setting future minimum energy efficiency standards against a combination of new Energy Performance Certificate (EPC) metrics. Do you agree with government's preferred approach of having a requirement to meet a primary standard set against the fabric performance metric and then a secondary standard set against either the smart readiness metric or heating system metric, with landlord discretion on which secondary metric their property meets?

Agree.

The councils would support a mechanism to encourage a fabric first approach to retrofitting.

Support will need to be available for landlords to decide what would be the most effective measures to invest in to deliver the most benefits, after all fabric improvements have been made. Resources need to be available to local authorities to provide this support.

Question 3: What are your views on the alternative approaches of:

- **Alternative 1: A requirement to meet a standard set against dual metrics of equal weighting. The standard would be set against dual metrics including 2 of the following: fabric performance, heating system and smart readiness.**
- **Alternative 2: A requirement to meet an overarching standard set against all 3 metrics of fabric performance, heating system, and smart readiness, either through improvements across all standards or through landlords concentrating improvements against one or two standards.**

No Response.

Question 4: Do you have any alternative suggestions for how government could utilise new Energy Performance Certificate (EPC) metrics as the basis for minimum energy efficiency standards (MEES) such as a single metric approach (e.g. fabric or cost based?) Please provide a rationale with your answer.

No Response.

Question 5: Do you agree with government's proposal to increase the maximum required investment (cost cap) for private rented sector minimum energy efficiency standards to £15,000 per property and for landlords to be able to register an exemption if expenditure would take them over this figure? If not, please set out whether you consider a cap should apply and how; and if so, what level you consider the cap should be set at and why (whether this is the 2020 proposal of £10,000 or another figure). Please explain your answer.

Agree with increasing the cost cap to £15,000.

Yes, the increased cost cap will result in a larger number of energy efficiency measures being installed, which will result in higher energy efficiency levels for tenants and lower carbon emissions to support the districts' net zero targets.

Measures need to be in place to limit how much landlords can pass these costs on to tenants by raising rents – so a balanced approach is needed.

Question 6: Should government extend the exemption period for the cost cap, currently set at five years, to ten years? If not, how long do you think the cost cap exemption should last? Please explain your answer.

No Response.

Question 7: Do you agree with the government's preferred implementation timeline to require 'new tenancies' to meet the higher standard from 2028 and 'all tenancies' to meet the higher standard by 2030? If not, do you have alternative suggestions?

Agree.

Action to improve the energy efficiency of homes is urgently needed and these dates must not be further delayed. The Oxfordshire Net Zero Route Map for the domestic housing sector identifies that 23% of existing properties need to be retrofitted to EPC B by 2030 (that is 16,000 homes), 83% by 2040 and 100% by 2050. To progress towards this, retrofitting of homes needs to be delivered at scale across all tenures. Higher minimum energy efficiency standards for the private rented sector would be a significant step towards achieving this target.

25% of greenhouse gas emissions in South Oxfordshire in 2022 was from domestic properties (Source: DESNZ). In 2021, there were approximately 10,277 privately rented homes in South Oxfordshire (Source: ONS).

22% of greenhouse gas emissions in Vale of White Horse in 2022 were from domestic properties (Source: DESNZ). In 2021, there were approximately 9,932 privately rented homes in Vale of White Horse (Source: ONS).

The councils support extending the scope of EPCs to HMOs when a single room within it is rented out – need to raise the quality of all housing stock.

Question 8: Do you agree with government's proposal that, as an EPC reform transition measure, landlords should be able to demonstrate their properties are compliant with the existing standard of EPC E using their past EPC?

No Response.

Question 9: Do you agree properties that have an EPC rating of C against the Energy Efficiency Rating (EER) on Energy Performance Certificates (EPCs) before 2026 should be recognised as compliant with the future standard until their EPC expires or is replaced?

Agree.

Yes, if existing EPC C ratings could not be used this may disincentivise willing landlords to take action now for fear that measures implemented would not be recognised by new system.

Question 10: Do you agree with government's proposal to require landlords to commission a new Energy Performance Certificate (EPC) before taking action to comply with higher minimum energy efficiency standards (MEES)?

Don't know.

Is there a risk that this may cause a backlog in the EPC process as landlords apply for new EPCs? We would not want this to deter or delay willing landlords to starting retrofitting work.

Should the cost of this new EPC be included within the cost cap?

Yes.

Should landlords still be required to commission post-improvement EPCs? If yes, should the cost of the post-improvement EPC also be included within the cost cap?

No Response.

Question 11: Should government develop an affordability exemption? If yes, what eligibility criteria would be the most appropriate for an affordability exemption? Please indicate which, if any, of the proposed approaches you support or otherwise provide alternative suggestions.

No.

The councils do not believe the government should develop an affordability exemption. Could a landlord loan scheme be developed to spread the investment costs if required?

Question 12: Should the government apply the private rented sector (PRS) minimum energy efficiency standards (MEES) regulations to short-term lets? Please explain your answer.

Yes.

The energy efficiency of all housing stock, including short-term lets, needs to be improved to increase the ability to meet net zero targets.

Question 13: What actions could the government take, including changes to the law, to encourage or require smart meters in properties undergoing efficiency upgrades to increase the number of smart meters installed in the private rented sector (PRS)? Please provide your rationale and evidence for any suggestions for actions you have.

No Response.

Question 14: Do you think the current minimum energy efficiency standards (MEES) exemptions available to landlords are suitable?

No Response.

Question 15: Do you agree with government's preferred position to keep a potential requirement on lettings agents and online property platforms under review whilst the private rented sector (PRS) Database is being developed for properties in England?

No Response.

Question 16: Do you have any new evidence to submit regarding the topics as summarised in Chapter 2 of this consultation? Please specify which topic you are providing new evidence for.

No Response.

Question 17: Is there any additional information or evidence you would like to provide on either the effectiveness of the existing private rented sector (PRS) regulations 2015 and guidance, or interactions with other policies?

No Response.