



Energy performance certificates for private marketed sales of dwellings: validity period of certificates

Northgate Information Solutions' response

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Northgate's response

1. Northgate welcomes the government's current consultation on energy performance certificates (EPCs). Our homes are responsible for 27% of the UK's carbon emissions; achieving deep cuts is critical to meeting the UK's targets for climate change. We are firm supporters of the energy performance certificate and believe that it should play a vital role in reducing the country's carbon footprint and changing attitudes and behaviour.
2. Our brief response draws on 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.
3. We are delighted to comment on the options for the validity period in the light of the government's analysis. We also wish to submit further points relating to the consumer response to EPCs and further ideas on how information could assist in changing behaviour and altering consumer action.

Validity period

4. We believe that cutting carbon dioxide emissions should be the fundamental policy objective for the EPC and that the use of EPCs should be part of a broader awareness-raising campaign dedicated to changing behaviour.
5. As the consultation document points out, people are more likely to act on timely information so long as that information is sufficiently robust, is from a trusted information source and is accessible and available to those who need it.
6. Given that there are so few repeat moves in under a year (around 4,000 of the 1.2m estimated moves annually), and that the government's analysis found that a one year validity period was the best option for saving CO₂, Northgate takes the view that the validity of certificates should be a period of one year.

Improving the system

7. If people are going to change their behaviour, they must trust the nature of the information supplied by the EPC. We have some concerns over issues which are affecting the reputation of the certificate, our customers and ultimately the scheme as a whole.
8. The problem as we see it is that the reduced SAP by its very nature is valid when it applies to the average home, but exceptional properties could fall foul of the test as exposed by recent media coverage. Exceptional properties include historic buildings and buildings where the owners have carried out energy efficiency measures over and above the norm. Some of these owners have invested heavily in energy efficiency measures and on selling the property are dismayed when the reduced SAP fails to take this into account. In their case, the more they do the less they are recognised by the scheme. As a result, some are already looking at taking up complaints procedures and when, as inevitably happens in these exceptional cases, no fault is found, some individuals may take their stories to the media.

9. We do not see this problem going away. The more that people are encouraged to change behaviour and adopt energy efficiency measures, the more likely it is that this problem will intensify as the assessment spreads across the housing stock. There is therefore a likelihood that the reputation risk for energy performance certificates will grow rather than settle down after this initial bedding in.
10. We believe that there are a range of solutions which could be actively considered by government including enhanced transparency and information for customers on the nature of the certificate, a government “health warning” on the nature of the exceptions, advice to owners of exceptionally enhanced energy efficient dwellings that they could undertake a full SAP or amendments to the investigation process itself.

Raising awareness

11. The energy performance certificate is currently made available to the public via the HIP. HIPs are available on request, but there is a powerful argument to suggest that HIP providers should automatically provide the energy performance certificate to the prospective purchaser, as there is no guarantee that the HIP would be requested or the information within it used.
12. We also believe that, as part of an awareness-raising exercise, there are strong arguments for the central registry information to be made available to the public on demand. This would enable them to review the energy efficiency performance of any house on the market through an online channel and help to build awareness.
13. There is a need also to raise consumer awareness through clear and transparent information outlining the role of energy performance certificates, of domestic energy assessors and how to make complaints in order to build trust in the system.

Making improvements – how local authorities can take the lead

14. Northgate believes that local authorities have a critical role to play in the achievement of the government’s emission targets. It supports the view that there must be a significant increase in the level of engagement of local government in action to tackle climate change.
15. As place-shapers, they need to take the lead in developing local initiatives which will encourage consumer action. For example, local authorities could develop energy service partnerships and joint ventures designed to eradicate energy inequalities and promote energy efficiency in their local areas and beyond.
16. We believe that local authorities should be given access to SAP and reduced SAP information. This would provide them with increased access to valuable information from which a new baseline could be agreed and progress monitored as to how much action had been taken in an individual area, allowing them to take targeted action to encourage changes in behaviour within their areas.

Measuring improvement

17. Information contained within the central registry could be used on a national, regional and local level to measure improvement in performance within the domestic sector and could be used to analyse whether or not EPCs are effective in changing behaviour.

Imposing a statutory duty to improve performance

18. If performance standards are to be raised across the board, there is a need for a high level strategic commitment to tackle climate change within local authority areas, as well as a reformulation of the way that local authorities work with their stakeholders, including the private sector, to address this critical issue.
19. Whilst measurement must be an integral part of the performance requirements, increasing emphasis must be placed on performance outcomes. There is currently no obligation on local authorities to adopt climate change targets in their area.
20. We take the view that there are strong arguments for imposing such a duty on local authorities so long as local authorities are given the resources to build upon this work.

About Northgate

Northgate Information Solutions is a leading provider of innovative energy efficiency services to the public sector and utilities markets. It is committed to sustainable development and high quality public services and understands the public sector. That knowledge is core to its business. Northgate's task is to enhance public value through the intelligent use of people and technology, and to share in the economic and social benefits that this brings.

In the UK, the company works with four out of five local authorities and every police force. Northgate supports public service transformation through sustainable performance partnerships. Its technology and services are used in the energy efficiency assessment of new dwellings and existing buildings. It is an accredited assessor of domestic energy assessors. Its services are used in the management of over three million local authority and housing association properties worldwide. Founded in 1969, the company has over 6,000 employees.

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