

By e-mail to epc.consultation@communities.gsi.gov.uk

Eve Martin
Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU

25th May 2010

Dear Ms Martin

Re: Unipol Student Homes response to Making better use of Energy Performance Certificates and data

Introduction

Unipol Student Homes is a national charity focussing on improving the provision of student housing, improving standards and promoting the extension of good practice throughout the sector. Unipol, currently houses 2,700 students within Leeds and runs advice services and accreditation schemes for the universities and local authorities in Leeds, Nottingham and Bradford. In this wider role Unipol engages with over 2,500 landlords and accredits 45,000 bed spaces in off-street properties.

Unipol Student Homes welcomes the opportunity to respond to the Government consultation on Making better use of Energy Performance Certificates and data. Unipol committed itself to a considerable input during the introduction of EPC's including a response to the original consultation, attendance at a number of round table meetings and a number of training seminars for landlords (and private providers?). Unipol's original response underpins much of this response although experiences of how the process has developed are also called upon.

Unipol (in partnership with ANUK) also administers two of the Government's Approved Codes of Practice for larger providers of student accommodation that currently covers 130,000 bed spaces.

Energy Performance Certificates for houses in multiple occupation

Unipol strongly believes that an EPC should be required for a HMO and that this requirement should be triggered at the same point as any other dwelling. Unipol believes that all rented accommodation, regardless of the type of tenancy agreement used, should be subject to an EPC which is available to tenants and prospective tenants. This requirement should also apply to 'excepted HMO's' which are covered by one of the Approved Codes of Practice for student accommodation.

Unipol believes that the public sector should lead the way in this area, encouraging good practice to emerge throughout the housing arena. In response to the original consultation regarding EPC's, we commented that "Most Universities will accept their responsibilities to provide EPCs" although this has in fact not happened and the recent

Unipol/NUS Accommodation Costs Survey questioned whether universities provided EPC's to their tenants with the following results:

In addition, Give this information to all students:

- 24% of institutions
- 15% of major commercial operators.

Provide this information on request:

- 18% of institutions
- 29% of private providers.

An EPC is compulsory for all rented accommodation except where parts of a house or flats are let on single tenancy agreements. For the purposes of student lets, this exemption creates a significant gap in the initiative, arguably sufficient to compromise its objectives. When EPC's were introduced, Unipol lobbied for the inclusion that "This is the most important issue we are raising and needs to be tackled at this stage as it effects 400,000 young people who are most supportive of EPBD and EPCs and would take them out of the EPC system altogether. I would ask to look at this area again." Unfortunately this remained and presently a number of tenants, students in particular, have no knowledge of the energy performance of their dwelling.

Sustainability issues are of growing importance. Despite Energy Performance Certificates not being legally required for students renting individual rooms in a complex, all students should have access to this information in the form of, at least, an EPC being displayed prominently in each entry lobby to the building and details being available on the web for students to see prior to renting.

We therefore wholeheartedly support the proposal to extend EPCs to HMOs with the addition that Excepted HMO's are not exempt.

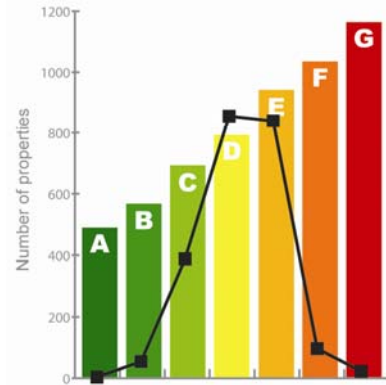
Making better use of energy performance data

Unipol has seen a considerable number of EPCs and, although it is still early days, it is possible to pass on some general impressions. Most newly built complexes are rated C and D (with gas heated complexes generally getting a C and electrically heated complexes getting a D). Most shared student houses will get a D or an E. If a house has been well insulated and has a recently fitted combination boiler then it can get a C. Anything with C or above is comparatively high on energy efficiency.

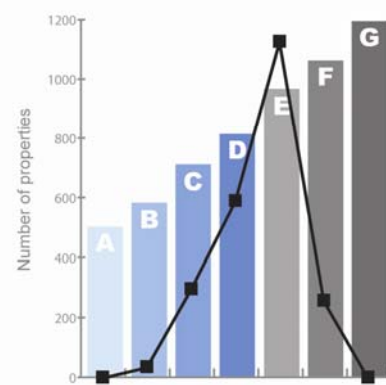
The graphs below illustrate the trends in energy performance from data obtained by Unipol in Leeds, Bradford and Nottingham and display the number of properties advertised in each band since January 2010 until today. This information has been used to inform students about what is available in the market. Access to this type of data should be widely available to enable tenants and owners to take a view of the market in terms of energy efficiency. Only through informing people of the market can informed decisions be made. For example, almost no houses will get an A but some houses do get a B. Likewise, almost no houses get a G, but any house on F and G will mean it is expensive to heat.

EPC's for properties advertised in Leeds

Energy Efficiency Rating

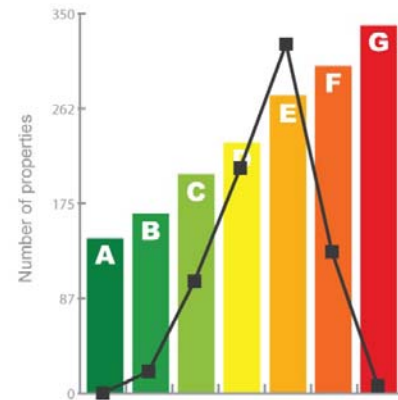


Environmental Impact (CO2)

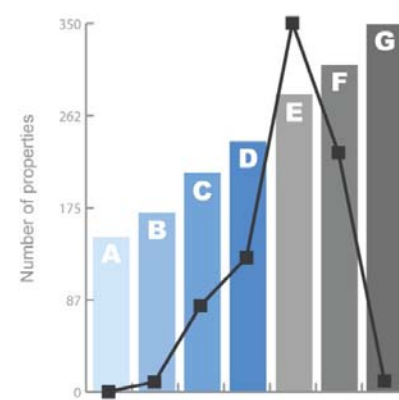


EPC's for properties advertised in Nottingham

Energy Efficiency Rating

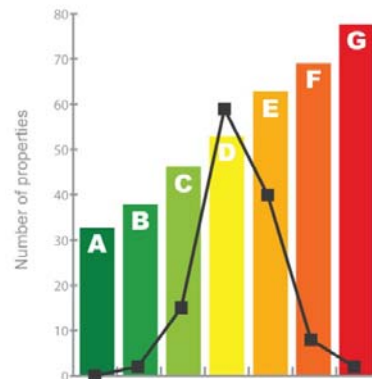


Environmental Impact (CO2)

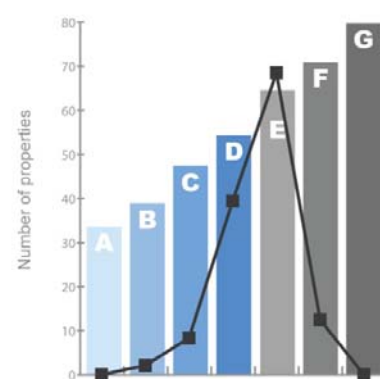


EPC's for properties advertised in in Bradford

Energy Efficiency Rating



Environmental Impact (CO2)



In answer to the relevant specific points raised, please see below, although I have not gone into detail as much of this is covered previously.

Do you agree that an EPC for a HMO should be required and triggered when a room in an HMO is rented out?

Yes

Do you agree that EPCs extended to HMOs should have a validity period of 10 years?

Yes, this should be in line with the validity of all EPC's

Energy performance certificate ratings in property advertisements

Do you agree that advertisements for the sale or rent of domestic and non-domestic property should include details of the EPC rating?

Yes. Tenants should have access to this data at the earliest opportunity and we see no reason why this should not be available at the time of advertising.

Do you agree that the scheme should be made compulsory by implementing the relevant provision in EPBD2 at an early opportunity?

Yes. In reality, this additional requirement for more properties to have EPC's is likely to provide little difficulty for most owners and should be implemented as soon as is practicable.

Yours sincerely



Scott Blakeway
Development Manager