



National Trust

National Trust and MEEES



- Working towards MEEES since 2015
- 5000 residential let estate, MEEES applies to roughly half our estate
- Own internal standards with a minimum bronze standard = compliance
- Most properties are off mains gas
- Approximately 500 properties affected by backstop date
- Huge investment to understand and manage

Energy Performance Certificate PREVIEW NOT FOR ISSUE SAP

Dwelling type: Detached bungalow Reference number: [REDACTED]
 Date of assessment: 20 September 2016 Type of assessment: SAP, new dwelling
 Date of certificate: 08 November 2016 Total floor area: 54 m²

Use this document to:

- Compare current ratings of properties to see which properties are more energy efficient
- Find out how you can save energy and money by installing improvement measures

Estimated energy costs of dwelling for 3 years:	£ 1,380
Over 3 years you could save	£ 372

Estimated energy costs of this home

	Current costs	Potential costs	Potential future savings
Lighting	£ 114 over 3 years	£ 114 over 3 years	
Heating	£ 540 over 3 years	£ 543 over 3 years	
Hot Water	£ 726 over 3 years	£ 351 over 3 years	
Totals	£ 1,380	£ 1,008	You could save £ 372 over 3 years

These figures show how much the average household would spend in this property for heating, lighting and hot water. This excludes energy use for running appliances like TVs, computers and cookers, and any electricity generated by microgeneration.

Energy Efficiency Rating

Rating	Current	Potential
(82 plus) A		122
(81-91) B		
(69-80) C		
(55-68) D	74	
(39-54) E		
(21-38) F		
(1-20) G		

The graph shows the current energy efficiency of your home.
 The higher the rating the lower your fuel bills are likely to be.
 The potential rating shows the effect of undertaking the recommendations on page 3.
 The average energy efficiency rating for a dwelling in England and Wales is band D (rating 60).

Actions you can take to save money and make your home more efficient

Recommended measures	Indicative cost	Typical savings over 3 years
1 Solar water heating	£4,000 - £6,000	£ 375
2 Solar photovoltaic panels, 2.5 kWp	£5,000 - £8,000	£ 933
3 Wind turbine	£15,000 - £25,000	£ 1,656




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Why do we have this problem?



Challenges in Selecting Measures

- Difficulty in identifying the range of energy measures and what SAP score they give.
- Over reliance on DEA's who have limited knowledge of detailed energy measures, buildings and practicality/cost.
- Some properties have not been able to allocate sufficient funds/staff to address the challenge.

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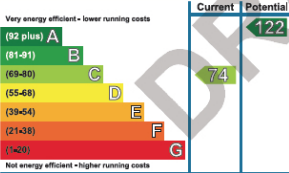
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Energy Efficiency Rating



Very energy efficient - lower running costs
 (82 plus) A
 (61-81) B
 (39-60) C
 (21-58) D
 (1-38) E
 (1-20) F
 Not energy efficient - higher running costs
 G

The graph shows the current energy efficiency of your home.
 The higher the rating the lower your fuel bills are likely to be.
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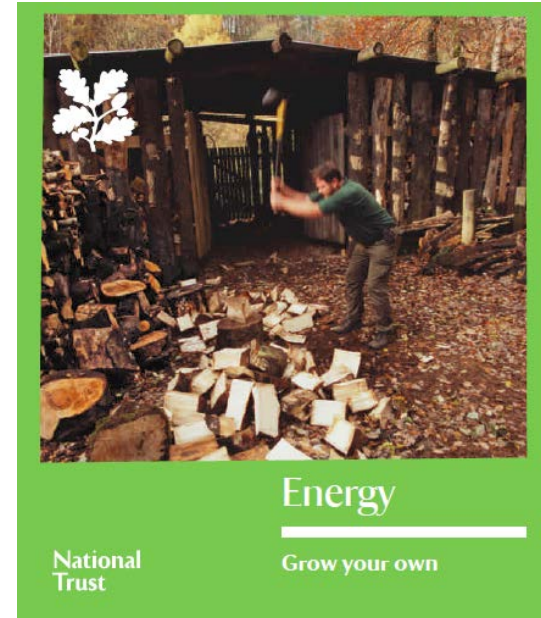


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Why do we have this problem?

Internal Challenges

- A lack of appreciation historically that this is a compliance issue.
- A lack of awareness and understanding of MEES
- Trust policy to get properties off oil has been a challenge – in some cases cost effective replacement systems (e.g. LPG) have caused EPC scores to drop.



We intend to reduce our use of fossil fuels for heat and electricity by 50% by 2020.

We will do this by:

- Conserving energy
- Growing our own electricity and heat
- Getting off oil
- Energy inspiration





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Why do we have this problem?

External Challenges

- Legislation is complicated with conflicting guidance
- Limitations in RdSAP methodology (basis of EPC's) can give inconsistencies in EPC's.
- DEA's tend to be independent workers and vary in their professionalism.

Energy Performance Certificate



Cot Lodge, Cot Hill
PLYMOUTH
PL7 1SB

Dwelling type: Detached house
Date of assessment: 16 June 2009
Date of certificate: 16 June 2009
Reference number: 8791-6326-6800-1356-3096
Total floor area: 34 m²

This home's performance is rated in terms of energy use per square metre of floor area, energy efficiency based on fuel costs and environmental impact based on carbon dioxide (CO₂) emissions.

Energy Efficiency Rating		Current	Potential
Very energy efficient - lower running costs			
(92 plus) A			
(81-91) B			
(69-80) C			
(55-68) D			
(39-54) E			
(21-38) F		29	29

Environmental Impact (CO ₂) Rating		Current	Potential
Very environmentally friendly - lower CO ₂ emissions			
(82 plus) A			
(61-81) B			
(49-60) C			
(35-48) D			
(29-54) E		47	47
(21-38) F			





How do we address this?

1. Help NT personnel identify the range of EPC measures and potential cost/benefits of each more easily.

Dashboard > Addresses > 4 Berwick Wharf, SY4 4TJ > Initiatives Lab Trial

Initiatives Lab: Try Out Initiatives

Trial Name:

Price set:

Save Action:

Select initiatives from this list:

Outcome Name	Group Name	Debug stuff		SAP results				
		Init	Status	Total/Costs	Score	Saving	E/SAP	Confidence
Boiler make and model recorded	PCDF boiler reference from generic SAP boiler information	+	Reviewed & E0 tested (live)	42.55 E	6.32	£0.00	10	
Wood logs secondary heating	Logs for secondary heating from dual fuel	+	Reviewed & E0 tested (live)	36.99 F	10.31	£0.00	10	
Community oil heating with controls	Oil community heating and full controls from individual oil heating	+	Reviewed & £3,000 tested (live)	59.73 D	22.52	£133.21	10	
CFL lighting throughout	Low energy lighting	+	Reviewed & E40 tested (live)	36.61 F	0.30	£133.33	10	
No secondary heaters	Remove secondary heaters - solid fuel	+	Reviewed & £250 tested (live)	32.04 F	1.83	£136.61	10	
Full non-communal zone controls	Full multi zone controls (room thermostat) from programmer, TRVs and valves	+	Reviewed & £600 tested (live)	40.10 E	3.89	£154.24	10	





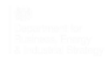
How do we address this?

2. Improve guidance on what the NT deems reasonable in relation to cost, use of oil systems, and managing impact on sensitive and listed building.



Domestic Private Rented Sector
Minimum Energy Efficiency
Standards Consultation
(PRS MEES)

Tamara Dimova and Stephen Ryman





How do we address this?

3. Identify when Listed Buildings can be excluded from MEES and how this can be done.

Listed Buildings and exemption from Energy Performance Certificates (EPCs)

Listed buildings have in the past been exempt from the need for an EPC at the point of sale or letting. However, from 1 April 2018 the situation is changing and landlords and sellers need to be aware of impending changes.

Unfortunately the regulations which determine the need for EPCs in England and Wales is far from clear.

When the regulations were enacted in January 2013, it was widely accepted that listed buildings were exempt from the requirement for an EPC for selling or letting. An EPC was required in other circumstances (such as to be eligible for Green Deal or the government's Feed in Tariff). The wording in the April 2014 Department for Communities and Local Government regulations is taken directly from the European Directive and states, under the heading of 'Situations where an EPC is not required, that:

"An EPC is generally not required where the seller or landlord can demonstrate that the building is - officially protected as part of a designated environment or because of their special architectural or historical merit where compliance with certain minimum energy efficiency requirements would unacceptably alter their character or appearance."

This understanding was confirmed by Historic England who stated that:

"An Energy Performance Certificate (EPC) is a legal requirement when building, selling or renting a property. However, there are exemptions for certain types of building and since January 2013 listed buildings have been exempted from the need to have an EPC."

More recently, in February 2017, the Department of Business, Energy and Industrial Strategy (the department which now has responsibility for EPCs) issued Guidance for landlords and enforcement authorities on the minimum level of energy efficiency required to let non-domestic property under the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015. It states that:

"Guidance issued by the Department for Communities and Local Government (DCLG) notes that an EPC is generally not required where the landlord (or the seller, if relevant) can demonstrate that the building is any of the following: a building that is officially protected as part of a designated environment or because of their special architectural or historic merit where compliance with certain minimum energy efficiency requirements would unacceptably alter their character or appearance."

However, on page 19 under the heading 'Listed Buildings and EPC Compliance' it goes on to say:

"There is a common misunderstanding relating to listed buildings and whether they are exempt from the requirement to obtain an EPC. Listed properties, and buildings within a conservation area, will not necessarily be exempt from the requirement to have a valid EPC and it will be up to the owner of a listed building to understand whether or not their property is required to have an EPC. Where a listed privately rented non-domestic property or a property within a conservation area, is required to have an EPC, that property will be within scope of the minimum energy efficiency standards."

As noted at 1.3.3 above an EPC is not currently required for a listed property or building within a conservation area when it

is sold or rented in so far as compliance with minimum energy performance requirements would unacceptably alter its character or appearance. Examples of energy performance measures which may alter character or appearance (or as a minimum are likely to require local authority planning permission to install on a listed building) include external solid wall insulation, replacement glazing, solar panels, or an external wall mounted air source heat pump. Where character or appearance would not be altered by compliance with energy performance requirements, an EPC may be legally required.

If an owner or occupier of a listed building is unsure about whether their particular property is or is not required to have an EPC, appropriate advice should be sought at the earliest opportunity."

I take this to mean that listed buildings are only exempt from the requirement for an EPC if compliance with the minimum energy performance requirements of the EPC would unacceptably alter its character or appearance. So in order to make an informed decision about whether an EPC is required, an owner would need an EPC because only then can they determine, presumably in consultation with the local planning authority, whether compliance with the requirements would be acceptable or not.

Others have taken the view that the UK Government now believes the exemption for listed buildings is much more restricted than had previously been accepted. Indeed, it would appear to be more compatible with the Scottish Government's interpretation that the exemption is solely from making improvements that would unacceptably

THE RETRO FIT-UP

HOW GOVERNMENT ENERGY POLICY IS FAILING OLDER HOUSES ACROSS THE BRITISH COUNTRYSIDE

EXECUTIVE SUMMARY

- Confusing and damaging government policy is holding back necessary investment to make homes warmer across the countryside.
- The Government's assessment tool for dwellings – the Energy Performance Certificate – is failing to accurately reflect the energy efficiency of traditionally built homes.
- Without urgent reform thousands of homeowners will continue to be signposted toward retrofit measures that are either inappropriate or outright harmful to the structure and character of the building.
- Strict rules that will ban landlords from renting out properties with an energy rating below E from 1 April 2018 are poorly communicated.
- Without urgent action thousands of rented homes across rural England and Wales are at risk of becoming incorrectly illegal to let.



ABOUT THE CLA

CLA members own and manage around 40% of the rural private rented sector. Our members let housing as part of wider land based businesses with property ownership ranging from one or two properties, to large estates managing hundreds of homes. The majority of properties our members let out have been in ownership for multiple generations, providing a long term rental option of both market and reduced rent housing to their communities. The private rented sector fulfils an important role in rural communities where other housing providers do not operate.

KEY FIGURES

CLA members provide private rented housing for around **275,000 households** across England and Wales.



Other questions & issues along the way

- Conflicting government advice across EPC and PRS legislation
- Lots of questions re EPCs:
 - Voluntary EPCs
 - EPCs when they expire
 - Sub-let cottages
 - Staff/key rep accommodation
 - Farm tenancies
 - Full repair leases
 - How to evidence listed buildings?



Other questions & issues along the way

- Change in exemptions and planning for the ‘interim period’
- Ensuring data (EPC/exemptions) are stored correctly and notifications are done for when exemption expires
- Backstop properties – how to fund work and how to work with tenants
- Longer void times between lettings
- How to integrate with other programmes of work taking place
- Non-domestic legislation

And of course what about Band C by 2030 and the changing government policy..?