

Submission

**Shelter submission to the BEIS
consultation on the Domestic Private
Rented Sector Minimum Level of Energy
Efficiency proposal to amend The
Energy Efficiency (Private Rented
Property) (England and Wales)
Regulations 2015 in relation to domestic
properties to remove the 'no cost to
landlord' principle**

March 2018

Shelter helps millions of people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.

We're here so no one has to fight bad housing or homelessness on their own.

Summary

- Shelter welcomes this opportunity to submit evidence to BEIS's consultation on proposals to amend the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 in relation to domestic properties to remove the 'no cost to landlords' principle.
- We are concerned that the current proposals risk over-complicating the debate and misses an opportunity to simplify and clarify regulations. One of the key aims of the Homes (Fitness for Human Habitation and Liability for Standards) Bill, currently before Parliament, is to bring the HHSRS and Fitness Standard together into one coherent set of standards. It will require all rented homes to meet a basic standard before they are let and throughout the tenancy. Combining the 2015 regulations within the HHSRS, strongly reinforcing the duties of local authorities and supporting renters to use their new rights, could ensure meaningful action on all F and G rated properties in the PRS.
- We agree that, if the Government pursues the approach set out in the consultation, landlords should contribute to improving the energy efficiency of their properties.
- We strongly disagree that the cap on costs for improving sub-standard domestic PRS property should be set at £2,500. We believe that the Government should be much more ambitious and set the cap at at least £5,000
- We do not agree that a cost cap for improving sub-standard domestic private rented property should be set inclusive of VAT.
- We agree that the cost cap should not take account of spending on energy efficiency improvements prior to 1 October 2017.
- We do not agree that the cost cap threshold should be inclusive of any funding which can be obtained through a 'no cost' finance plan, supplier obligation funding (including ECO funding) or energy efficiency grant funding from a local authority or other third party.
- We agree that, where a landlord is intending to register a 'high cost' exemption, they should be required to provide three quotes for the cost of purchasing and installing the measures. We would suggest that landlords should also confirm that they have explored alternative (and additional) sources of funding, including ECO and Affordable Warmth schemes.
- If this regulation is to result in a meaningful improvement to energy efficiency, bringing Band F and G properties up to Band E, then local authorities will need significant additional resource for enforcement.

- We are concerned that the proposal to allow local authorities to choose to delegate responsibility for enforcement to Trading Standards rather than Environmental Health could hinder effective implementation, particularly where Trading Standards is at County rather than District level in two-tier authorities. Environmental Health holds additional powers that can support action on energy as well as wider improvements in housing standards.
- We are disappointed that most Houses of Multiple Occupation (HMOs) will not be covered by these proposals.
- Additionally, we believe that a higher cap need not unduly burden those landlords who own very low value properties nor will it result in higher rents or landlords leaving the market.

Introduction

Shelter welcomes this opportunity to submit evidence to BEIS's consultation on proposals to amend the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 in relation to domestic properties to remove the 'no cost to landlords' principle.

Everyone should have a home that is warm, safe and secure. But too many homes in today's private rented sector are in very poor condition, severely compromising families' health and wellbeing.

Property conditions in the private rented sector are worse than any in any other tenure and the PRS has more cold properties than any other tenure. The PRS has the largest proportion of energy efficient Band F and G rated properties, 6.6 per cent. In comparison, only 1% of social housing is F and G rated.¹ The size of the PRS has increased by 2% in the past year, while the number of F and G rated properties has increased by 7%.²

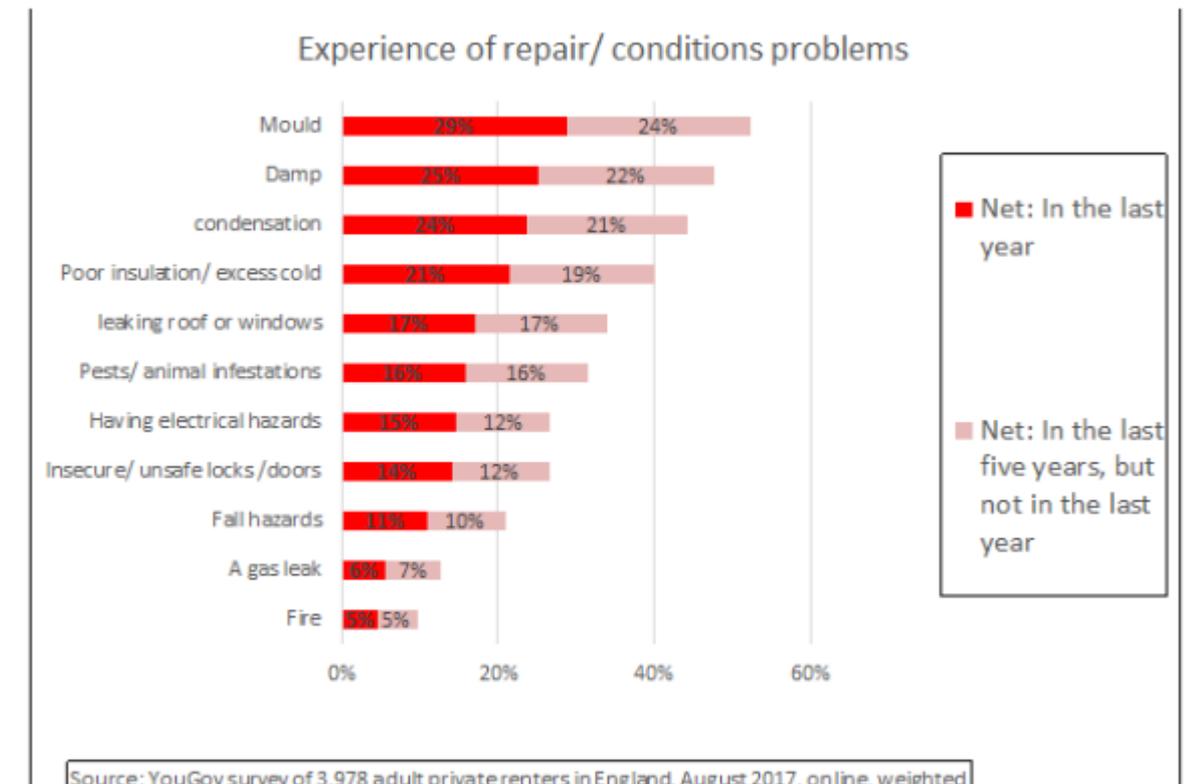
The Government's most recent fuel poverty data shows that households living in the PRS have the highest prevalence of fuel poverty – 21.3% compared to 7.4% in the

¹ MHCLG, 2018, English Housing Survey 2016-17 Headline report

² Ibid.

owner occupied sector, rising to a staggering 45.7% in F and G rated properties in the PRS.³

Our recent survey of renters⁴ showed that problems related to excess cold, including damp, mould and poor insulation, continue to be the most common, with many respondents reporting both damp and mould.



MEES, HHSRS and the Fitness Bill

Shelter is concerned that the current proposals risk over-complicating the debate and miss an opportunity to simplify and clarify regulations. One of the key aims of the Homes (Fitness for Human Habitation and Liability for Standards) Bill, currently before Parliament, is to bring the HHSRS and Fitness Standard together into one coherent set of standards. It will require all rented homes to meet a basic standard before they are let and throughout the tenancy.

³ <https://www.gov.uk/government/statistics/annual-fuel-poverty-statistics-report-2017>

⁴ Shelter, 2017, Survey of Renters

Combining the 2015 regulations within the HHSRS, strongly reinforcing the duties of local authorities and supporting renters to use their new rights proposed by the Homes (Fitness for Human Habitation and Liability for Standards) Bill, could ensure meaningful action on all F and G rated properties in the PRS. Please see our response to Question 9 below for further discussion of this.

Response to consultation

Question 1: Capped landlord contribution proposal

Do you agree with the policy proposal under consideration here to introduce a landlord contribution element where funding is unavailable to ensure improvements to Band F and G properties can be delivered (unless a valid exemption applies)? This would be subject to a cost cap as discussed below.

Shelter strongly agrees that, if the Government pursues the approach set out in the consultation, landlords should contribute to improving the energy efficiency of their properties. We are, however, concerned that introducing a cap of any sort will undermine the Government's own carbon reduction⁵ and fuel poverty targets⁶, which include aims and aspirations to bring all homes to an EPC band C rating or better. See Question 9 for more about the MEES trajectory.

Landlords – whether they own one or one hundred properties – are businesses and they should meet minimum standards in order to operate in the market. It is unacceptable for landlords to be receiving income from renting out substandard properties that do not provide a healthy living environment.

Question 2a: Setting a cost cap for the domestic minimum standard

Do you agree that a cap on costs for improving sub-standard domestic PRS property should be set at £2,500? If you do not agree, what would be the most appropriate level to set the threshold? Please provide reasons and evidence to support your views.

Shelter strongly disagrees that the cap on costs for improving sub-standard domestic PRS property should be set at £2,500. We believe that the cap should

⁵ HM Government, The Clean Growth Strategy, Leading the way to a low carbon future, October 2017: www.gov.uk/government/uploads/system/uploads/attachment_data/file/651232/BEIS_The_Clean_Growth_online.pdf

⁶ Cutting the cost of keeping warm, A fuel poverty strategy for England: www.gov.uk/government/uploads/system/uploads/attachment_data/file/408644/cutting_the_cost_of_keeping_warm.pdf

be set at, at least, £5,000 in order to maximise the number of properties that benefit from energy efficiency measures and to ensure that as many households as possible are taken out of fuel poverty.

Table 3 from the consultation document sets out the number of properties that will be impacted by the policy across a range of cost cap options:

Table 3: Estimated impacts of cap level policy options 1 – 4

Cap level	% of homes reaching Band E or above	Number of homes improved to E	Number of homes insulated by April 2020 (including those not reaching E)	Average cost of achieving Band E or above	Average cost for properties not reaching Band E*:	Estimated average annual energy savings for tenants
Option 1: £1,000	14%	40,000	129,400	£150	£325	£85
Option 2: £2,500	30%	85,000	139,200	£865	£1,025	£95
Option 3: £3,500	32%	90,000	155,600	£975	£1,430	£109
Option 4: £5,000	42%	120,000	260,400	£1,700	£2,100	£188

The most recent EHS reveals that the private rented sector has grown by 700,000 properties since the Government produced its impact assessment.

This table shows that the Government’s preferred option (2 - £2,500) will only result in 85,000 (30%) of the 280,000 F and G rated properties in the PRS being improved to EPC band E or above. This option will only result in 139,200 (49.71%) of properties having some form of energy saving improvement, leaving 140,800 homes (50.2%) with no improvements to their energy efficiency. This is unacceptable.

We believe that the Government should be much more ambitious.

The consultation document states that a much greater proportion of property improvements are cost effective with Green Deal funding. The impact assessment (IA) prepared for the current minimum standard regulations, and published in 2014, estimated that there were approximately 400,000 domestic PRS properties in England and Wales with an EPC rating below Band E.⁷ The IA further estimated that approximately 73% of these F and G rated properties would be able to meet the E standard within the Green Deal 'golden rule' threshold. A further 10% of properties were estimated to make some improvement to their energy efficiency within the threshold but not reach EPC E. The IA estimates that only 17% could make no improvements within the 'golden rule', where the cost of even the cheapest energy efficiency improvement would have been beyond the threshold.

Option 4 (£5,000) would result in 120,000 properties (42%) being improved to Band E or above, at an average cost per property of between £1,700 and £2,100. 260,400 (93%) of the 280,000 F and G EPC rated properties having some form of energy saving improvement, leaving 19,600 homes (7%) with no improvements to their energy performance. This is the cap recommended by the Government's own advisory group, the Committee on Fuel Poverty.⁸

Further, we are concerned that the proposed cost cap (option 2, £2,500) risks improvements being made to Band F properties to bring them up to Band E, while existing Band G properties – the most inefficient and substandard properties – are left because they cannot be brought up to standard within the cost cap. This would see tenants in homes in the poorest conditions continuing to suffer from fuel poverty and ill health by living in cold and damp conditions.

In summary, we believe that increasing the cost cap to £5,000 is vital to ensure that the most vulnerable tenants, living in the worst-performing properties, are protected, eliminating the worst-performing properties from the rental market altogether and supporting the drive towards eliminating fuel poverty.

Question 2b: Treatment of VAT under a cost cap

⁷https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/401379/150202_PRS_Final_Stage_Revised_For_Publication.pdf

⁸https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652701/CFP_report_for_matted_-_final.pdf

Do you agree that a cost cap for improving sub-standard domestic private rented property should be set inclusive of VAT?

Shelter does not agree that a cost cap for improving sub-standard domestic private rented property should be set inclusive of VAT. Currently, VAT is paid at a reduced rate of 5% for the installation of certain energy-saving products and work on heating appliances and systems covered by an energy efficiency grant, if the householder is over 60 years old and in receipt of certain benefits. The standard rate of 20% is paid on heating appliances and systems not covered by a grant, energy efficient boilers and secondary or double glazing. Reducing the VAT payable on these energy efficiency measures. By excluding VAT from the cost cap, we can maximise the amount of money spent on energy efficiency improvements.

Question 3: Pre-October 2017 energy efficiency improvements

Do you agree that a cost cap should not take account of spending on energy efficiency improvements incurred prior to 1 October 2017?

Shelter agrees that the cost cap should not take account of spending on energy efficiency improvements prior to 1 October 2017, certainly if it is to be set at only £2,500. While it is good that landlords have invested to improve their property, if it is still sub-standard then this investment should not be taken into account.

Question 4: Third party finance – reducing costs to landlords under a cost cap

Do you agree with the proposal that, where a landlord contributes to the improvement, the cost cap threshold should be inclusive of any funding that can be obtained through a 'no cost' finance plan (including a Green Deal finance plan, Supplier Obligation Funding or energy efficiency grant funding from a Local Authority or other third parties?

Shelter does not agree that the cost cap threshold should be inclusive of any funding which can be obtained through a 'no cost' finance plan, supplier obligation funding (including ECO funding) or energy efficiency grant funding from a local authority or other third party.

Green Deal loans are funded on a pay as you save basis, so the landlord is not contributing anything but gets the benefit of the improvement through increased house

prices. We do not believe that it is truly no-cost for tenants – if a tenant has insufficient income to heat their home, improving it will make it warmer, but the tenant might continue to choose to carry on not heating it – costs do not fall if a tenant is under-heating their home to begin with.

We consider that a cost cap set at £5,000, as recommended by the Government’s own advisory group, represents a reasonable burden to landlords and, therefore, we can see is no justification for allowing other sources of funding to meet it.

Landlords – whether they own one or one hundred properties – are a business and they should meet minimum standards in order to operate in the market. Over half (54%) of landlords in our most recent Landlord survey⁹ said they had no outstanding mortgages on any of homes they let out. Eight in ten landlords said they were running a profit, with half of those (40% of all surveyed) saying that they “collect a lot more in rent than my costs”. Actual average profit margins were a mean of £625 per month and a median of £450, among those in profit, mostly due to the small number of properties owned. Expectations on landlords should be consistent, and not dependent on the status of either their property or their tenants – on which access to the funding schemes outlined above are based. Where third party funding is dependent on the status of the household (e.g. affordable warmth), the landlord is already benefitting from their tenant.

Additionally, it has been suggested that ECO funding should not be used to support action required under the HHSRS. Research¹⁰ suggests that EEC funding could not be used by landlords once an improvement notice had been served, since the measure had become a legal requirement:

Accessing grant funding after an enforcement notice is served

Once a local authority takes enforcement action against a landlord, the landlord forfeits his/her rights to access energy supplier scheme funding; the EEC administration document states that Ofgem needs to satisfy itself that a notified action under EEC will result in energy efficiency improvement “beyond that which is already required to be achieved under legal requirements”.

⁹ Shelter, 2017, Landlord survey

¹⁰ Impetus Consulting, 2008, Tackling fuel poverty using the Housing Health and Safety Rating System (HHSRS)

Ofgem responded to the Association for the Conservation of Energy (ACE)'s questions about whether the same rules applied to ECO:

We still have similar rules regarding additionality under the ECO scheme as we did under previous obligation schemes – a measure cannot count towards a supplier's obligation if it would have to be installed anyway.¹¹

Therefore, a measure would only be eligible under ECO if it resulted in an energy efficiency improvement beyond that which is already required to be achieved by legal requirements.

We therefore question whether ECO funding should be used by landlords to reach the minimum legal requirement to mitigate a Category 1 Excess Cold hazard under HHSRS, or properly meeting MEES.

The proposal to amend the regulations means that a landlord is only legally required to meet the standard if they have to spend no more than the cost cap, including any money supplied by ECO. In the absence of any ECO (or other) funding, they would still have to spend up to the cost cap. We therefore believe we are right to interpret this as meaning that works to comply with the regulations are not ECO eligible under supplier obligation additionality rules.

While some grant funding from local authorities, including carbon offset funds, and other third parties, is available in some locations, we would argue that the same additionality rules should be applied.

Therefore, **we recommend that any additional finance and funding should not be included in the cap.**

Question 5: Identifying supplier obligation spend

Do you agree that it is not necessary to place a regulatory duty on energy suppliers, or their agents, to provide landlords with cost information relating to the value of energy efficiency improvements made to the landlord's property through a supplier obligation?

¹¹ ECO2t Guidance, para 2.2

As stated above, we do not believe that ECO funding should be included within the cost cap. However, if it is to be included, then **it is essential that landlords have access to cost information**. Landlords will also need guidance about how to access ECO funding.

Question 6: Demonstrating an exemption where a sub-standard property cannot be improved to E within the cap

Where a landlord is intending to register a 'high cost' exemption, should the landlord be required to provide three quotes for the cost of purchasing and installing the measures, in line with the non-domestic minimum standards?

Shelter agrees with the proposal that, where a landlord is intending to register a 'high cost' exemption, they should be required to provide three quotes for the cost of purchasing and installing the measures. Three quotes are a good safeguard against fraud. There is no reason why this requirement should be any different to the MEES regulations in the non-domestic sector. **We would suggest that landlords should also confirm that they have explored alternative (and additional) sources of funding, including ECO and Affordable Warmth schemes.**

BEIS, as the 'keeper' of the exemptions register, should have a process in place to verify that these quotes come from reputable sources and avoid excessive costs (which might vary in different parts of the country), without increasing burdens on local authorities or directing work to a few, big, contractors.

Question 7: Curtailment of existing 'no cost' exemptions

Do you agree with the proposal to limit the validity of any 'no cost to the landlord' exemptions (under Regulation 25(1)(b)) registered between October 2017 and the point at which a capped landlord contribution amendment comes into force?

We agree that the government should limit the validity of any new 'no cost' exemptions registered between October 2017 and the point at which a capped landlord contribution amendment comes into force. We recommend that BEIS seeks legal advice, to ensure that any appeals to the First Tier Tribunal (FTT) would be quashed, and engage with the FTT on this issue.

Local authorities will also require reassurance that they can successfully revoke exemptions without risk of cases being overturned at the FTT. Research conducted for our Happier and Healthier report¹² found that the resource burden on local authorities to prepare for, and attend, FTT cases for HHSRS cases is considerable. Government should take steps to minimise this additional burden.

Question 8: Exemption where a tenant has refused consent to a Green Deal plan
Do you have views on whether the consent exemption under Regulation 31(1)(a)(ii) should be removed from the minimum standard regulations or retained?

As stated above, we believe that any funding received through the Green Deal should be additional to the cost cap. Any exemption based on a tenant's refusal to consent should only last as long as the tenant lives in the property – the landlord should be required to ask new tenants to consent at the beginning of a new tenancy.

We have concerns about how this, along with much of the new policy, is going to be enforced. Without significant additional resource, already overstretched local authorities will struggle to identify properties in Bands F and G, particularly in areas without established licensing schemes covering much of their PRS. This proposal would also require them to then engage with tenants who are said, by their landlords, to have refused their consent.

Question 9: Do you have any comments on the policy proposals not raised under any of the above questions?

MEES, HHSRS and the Fitness Bill

Shelter is concerned that the current proposals risk over-complicating the debate and miss an opportunity to simplify and clarify regulations. The Housing Health and Safety Rating System (HHSRS) has existed since 2006 and places a duty on local authorities to review their housing stock to establish where category 1 and 2 hazards exist and to act where a category 1 hazard is identified.

The HHSRS replaced the Fitness Standard and is, therefore, responsible for defining where a property is, effectively unfit for human habitation. No property with a category

¹² Shelter, 2017, Happier and Healthier: improving conditions in the PRS

1 hazard can be described as decent, the minimum standard for housing. A non-decent home is an unhealthy home.

The original HHSRS guidance is clear: it is the responsibility of the landlord to rectify the conditions that are causing a category 1 hazard. One of the main hazards is excess cold. Recent research from E3G and NEA has found that, over the last five years, there has been an average of 32,000 excess winter deaths in the UK every year. Of these, 9,700 are due to cold homes. The majority of these 9,700 deaths - 6,900 - are linked to the coldest 25% of homes in the UK. Alongside this, approximately 3,200 excess winter deaths are linked directly to people experiencing fuel poverty: that is when low incomes and high, or relatively high, energy bills combine to make a warm home unaffordable. This also leads to poor mental health such as chronic depression and, tragically, suicide.¹³

Although the guidance urgently needs updating to reflect today's standards and align the HHSRS and SAP (Standard Assessment Procedure) rating systems¹⁴, the original guidance made it clear that all G-rated and most F-rated properties would likely have a category 1 hazard from excess cold. A SAP rating is the government's recommended system for producing a home energy rating. There are seven bands, ranging from A – G and each range has a set amount of SAP points. Band A, for example, has 92-100 SAP points and is the most efficient, Band G is 1 -20 points and is least efficient. A SAP rating of less than 35 was established as a proxy for excess cold in 2001.¹⁵

One of the key aims of the Homes (Fitness for Human Habitation and Liability for Standards) Bill, currently before Parliament, is to bring the HHSRS and Fitness Standard together into one coherent set of standards. It will require all rented homes to meet a basic standard before they are let and throughout the tenancy.

The amendments proposed in this consultation provide a clear opportunity to bring together the existing HHSRS legislation, the 2015 regulations and the Fitness Bill, by clarifying and reinforcing the HHSRS category 1 hazard for excess cold. This hazard should be defined as any domestic property rated F or G on the EPC scale. Any property that cannot be brought up to EPC Band E should, ultimately, not be available to rent. The local authority already has a duty to enforce the HHSRS and, if the Bill is

¹³ E3G and NEA, 2018, *Cold homes and Excess Winter Deaths: A preventable public health epidemic that can no longer be tolerated*

¹⁴ CIEH (2017), *HHSRS – 11 years on*. Chartered Institute of Environmental Health

successful, individual renters will have new rights to take legal action against a landlord who fails to maintain a property at Band E or above.

There is a risk, in the current consultation, of making the process awkward for landlords and time- and resource-consuming for local authorities. Combining the 2015 regulations within the HHSRS, strongly reinforcing the duties of local authorities and supporting renters to use their new rights, could ensure meaningful action on all F and G rated properties in the PRS.

MEES trajectory

While BEIS has noted its intention to consult on the trajectory of MEES later in the year, ACE would recommend that details of the overarching trajectory – that PRS properties will be required to meet EPC band C by 2030 – should be included in guidance to landlords and local government as soon as possible. This will reaffirm government’s commitments set out in the Clean Growth Strategy.

A firm target will also enable the energy efficiency supply chain to better plan resources for delivery, helping to ensure the availability of qualified and experienced installers at the right time.

Enforcement and burden funding

The Impact Assessment includes a figure of £35m for enforcements cost, but it is not clear how this has been calculated. **If this regulation is to result in a meaningful improvement to energy efficiency, bringing Band F and G properties up to Band E, then local authorities will need significant additional resource for enforcement.**

Despite examples of good practice, as evidenced in our Happier and Healthier report¹⁶, local council capacity to continue to improve standards in the PRS has reduced in the face of funding reductions and increasing demand. Formal enforcement activity is still low, with many councils preferring to take an informal approach instead.¹⁷ FOI research in 2015 found that formal enforcement activity (hazard

¹⁶ Shelter, 2017, Happier and Healthier: improving conditions in the PRS

¹⁷ See for example, Pidgeon C (2016) Rogue Landlords in London: A survey of local authority enforcement in the private rented sector and Battersby S (2015) The challenge of tackling unsafe and unhealthy housing: report of a survey of local authorities for Karen Buck MP

awareness notices, improvement and prohibition notices, as defined under the Housing Act 2004) had fallen by 40% since the previous Parliament.¹⁸

Local authority delegation of powers

The consultation suggests that local authorities will be able to choose to delegate responsibility for enforcement to Trading Standards rather than Environmental Health. We are concerned that this could hinder effective implementation, particularly where Trading Standards is at County rather than District level in two-tier authorities. Environmental Health holds additional powers that can support action on energy as well as wider improvements in housing standards.

HMOs

Shelter is disappointed that most Houses of Multiple Occupation (HMOs) will not be covered by these proposals. Approximately 10% of PRS properties in England and Wales are classified as HMOs. Whether an HMO is required to obtain an EPC, and therefore falls within the regulations, depends on the particular set up of the property and/or the tenancy agreement. Changes to the Local Housing Allowance, particularly in high rent areas such as London, will result in increasing numbers of under-35s moving into HMOs and yet many have very poor energy efficiency.

Question 10: Do you have any evidence or information on the potential for these proposals to impact on the PRS market, including any potential for landlords who are required to act by the minimum standard regulations to pass through costs to tenants after making improvements to their properties?

A higher cap would not increase rent levels

Analysis by Frontier Economics for Citizens Advice¹⁹ demonstrates a negligible impact of a cost cap set at £5,000 on rents and supply of property in the PRS market, and weighs this against the benefits in increased energy efficiency and reduced energy costs.

¹⁸ Battersby S (2015) *op cit*.

¹⁹ <https://www.frontier-economics.com/documents/2015/09/energy-efficiency-infrastructure-priority.pdf>

The research looked at three typical properties, covering different regions and types of property. In all these cases, the research shows that a more effective minimum standard would bring a substantial benefit to tenants, by reducing their energy costs.

The research shows tenants will benefit *whether or not* landlords are able to put up rent.

In the chart below, the lighter part of each bar shows the difference between those two scenarios. This reflects the fact that renters' energy costs will fall so significantly, although it doesn't guarantee that the home is any warmer.

The expected net annual benefits for tenants moving from Band F to Band E²⁰:



Expected net annual benefits for tenants moving from Band G to Band E:



Source: Frontier Economics analysis, based on a £5000 cost cap

²⁰ <https://wearecitizensadvice.org.uk/how-the-government-can-help-renters-in-cold-homes-4653f3130237>

Also, landlords will be forced to minimise any rent increases by spreading them over time and there are reasons to expect that landlord's ability to put up rent at all may be limited - F and G rated properties have to compete in a wider rental market, of which they make up only 6%.

The research expects few, if any, properties will be taken off the market as a result of the policy. A cost cap of £5000 would guard against this, but would still mean over 90% of F and G rated properties are improved.

Meanwhile, there are benefits from the policy not covered in the figures above, like the improved health outcomes to renters from warmer homes. For landlords, there is evidence that a 'better' EPC has a positive impact on house prices and they could see the resale value of their property increase, even if rents don't.²¹

In short, this policy can bring renters a financial boost and improve their living conditions, without adverse impacts on the rental market.

March 2018

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²¹ <https://www.gov.uk/government/publications/an-investigation-of-the-effect-of-epc-ratings-on-house-prices>