

**FINAL**



# Consultation Response

## Home Buying & Selling Reform

Prepared for: Ministry of Housing, Communities & Local  
Government

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**Elmhurst Energy**

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## 1. Introduction

Elmhurst Energy are pleased that MHLG are seeking a Consultation on 'Home Buying and Selling Reform' and as such we are delighted to respond to each question in turn. Elmhurst welcomes the proposed reforms as a positive step toward creating a more transparent and efficient property market. By making key property information available earlier in the process, buyers and sellers can make informed decisions sooner, reducing delays and uncertainty. This is also an opportunity to integrate energy performance data—such as EPC ratings and heat loss figures—into property listings, ensuring sustainability and running costs are considered from the outset.

The Consultation asked 30 questions and we have answered them all below. We hope you find the responses considered and useful for taking Home buying and selling forward in a progressive manner.

## 2. Questions and Answers

### Consultation questions

#### Question 1

**Are you responding as an individual or Organisation?**

Organisation

#### Question 2

**If responding as an individual - what is your name?**

N/A

#### Question 3

**If responding on behalf of an organisation - what is the name of your Organisation and what is your role?**

Elmhurst Energy Systems Ltd

#### Question 4

**What type of organisation are you responding on behalf of – estate agent, surveyor, conveyancer, professional body, developer, other?**

Energy Assessor Certification Scheme

#### Question 5

**Do you agree with the proposed objectives for reforming the home buying and selling system?**

Elmhurst support the proposed objectives, particularly the emphasis on improving transparency, reducing transaction times, and empowering consumers. It is vital that EPCs play a vital role in achieving these goals by providing clear, accessible information about a property's energy efficiency and potential running costs and potential retrofit improvements to be made.

#### Question 6

**Are there any objectives you think should be changed, removed, or added?**

Elmhurst suggest adding an objective to enhance the visibility and use of EPCs in the home buying process. Making them a central part of the upfront information which would improve consumer understanding and support the government's net zero ambitions.

#### Question 7

**Do you agree that there should be a mandatory requirement for sellers and estate agents to provide comprehensive upfront information?**

Elmhurst agree with this statement. EPCs should be included as mandatory upfront documentation at the point of listing. This would:

- Improve buyer confidence
- Increase buyer awareness of the energy efficiency of the property in question.
- Encourage energy efficiency upgrades post purchase where applicable

### Question 8

**Do you agree that this should include a requirement to order property searches and undertake a property condition report?**

Elmhurst have no strong opinion

### Question 9

**What steps should government take to ensure that conveyancing lawyers, estate agents and surveyors have the capacity and capability to implement this change?**

Elmhurst consider that the Government should:

- Promote training and awareness around EPCs and their interpretation.
- Encourage collaboration with accredited Schemes and energy assessors.
- Ensure all professionals involved provide the actual EPC NOT an A-G graph which can be misunderstood.

### Question 10

**What resources and additional training would be needed in order to implement these changes?**

Elmhurst consider the resources to provide the EPC are already fully available through Qualified Assessors in the form of accreditation requirements, continual professional development opportunities and training. All readily available within the scope of products offered by accreditation schemes, such as Elmhurst. The other professionals above need to ensure the EPC is part of the upfront information – via education/publications /training

### Question 11

**Do you agree that we should intervene to drive up standards amongst, and improve trust in, property agents?**

No strong opinion

### Question 12

**Do you agree with our proposal to bring forward a Code of Practice on a non-statutory basis, and to legislate to put this on a statutory footing in future if necessary?**

Elmhurst agree in principle and that the code of conduct should provide clear guidance on the use and presentation of EPC's, ensuring consistency and accuracy across the sector

### Question 13

**Do you agree with our proposal to consult on mandatory qualifications for estate and lettings agents?**

Elmhurst agree with the qualifications to include basic energy literacy , enabling agents to explain EPCs and energy efficient measures to prospective buyers and tenants and other policy legislation for example MEE's. Communication with existing DEA's to provide this information after inspection should also be encouraged.

### Question 14

**Are there additional interventions you think government should take to drive up standards amongst property agents?**

No strong opinion

### Question 15

**Are there any other areas across the property agent sector that needs to be monitored or regulated in order to improve the customer journey?**

Elmhurst consider it important that the accuracy and visibility of EPC's should be monitored. Agents should be required to display EPCs prominently, provide links to the full certificate and ensure there is no misrepresentation of EPC data for the property.( Property Misdescription Act 1991)For example an epc with a gas boiler still has 5 years to run when a property is placed on the market. However a new ASHP has recently been installed but no revised epc

produced. A new EPC must be commissioned to reflect the current property in respect to the EPC.

#### **Question 16**

**Do you agree that government should aim to support the wider use of digital property logbooks and packs?**

Elmhurst have long supported this proposal which if used well which can be enhanced at a later stage with any property upgrades such as new extensions and heating upgrades

#### **Question 17**

**If yes, what do you think would drive their wider adoption? How could government support this and do you think that legislation might be needed to bring about this change?**

This would bring all government held data into the log book would be a solid starting point.

#### **Question 18**

**What risks would need to be considered when creating and storing digital logbooks?**

Elmhurst consider and data protection and cyber security paramount in ensuring online security and confidence in the process.

#### **Question 19**

**Do you agree that government should support mechanisms to make property transactions more binding at an earlier stage?**

Elmhurst have no strong opinion on this point

#### **Question 20**

**What do you think is the most effective means of doing this – incentivise estate agents to offer this as a service, raise consumer awareness of binding agreements, legislate to require their use in property transactions etcetera?**

Elmhurst have no strong opinion on this point

### **Question 21**

**What would be appropriate costs or penalties for failure to comply with binding contracts?**

Elmhurst have no strong opinion on this point

### **Question 22**

**Would there be any listed exceptions, or certain situations, for binding contracts not being applied?**

Elmhurst have no strong opinion on this point

### **Question 23**

**Do you agree that publishing information on the services of property professionals would improve home buying and selling by supporting consumer choice and driving competition?**

Elmhurst have no strong opinion on this point

### **Question 24**

**What information would you want to see included in a service of this type?**

Elmhurst have no strong opinion on this point

### **Question 25**

**Do you think a charter as set out above would be useful in supporting consumers to identify quality property professional services?**

Elmhurst have no strong opinion on this point

### **Question 26**

**Do you agree that AML checks should be streamlined?**

Elmhurst have no strong opinion on this point

### **Question 27**

**How can government most effectively support the application of AI conveyancing technology?**

Elmhurst have no strong opinion on this point

### Question 28

**What else do you think government should do to streamline the conveyancing process?**

Elmhurst have no strong opinion on this point

### Question 29

**Do you agree that this is the correct direction of travel?**

Elmhurst have no strong opinion on this point

### Question 30

**Is there anything else that government should be doing to promote digitalisation of the property sector?**

Automatic Connection from proposed log book to EPC Central Register.

As with any good new regulations the Government needs to promote the changes, provide enforcement, incentives, and education to all stakeholders



## Contact Details

Should you require any further clarification,  
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