

## Guidance Notes - RdSAP or SBEM

### 1) RdSAP or SBEM for buildings with living accommodation for multiple occupiers/tenants. (Excluding domestic dwelling type properties)

Think of each relevant group of rooms that are not shared parts as a "unit".

What not to base your decision on:

- a) It doesn't matter whether the "units" are serviced or un-serviced
- b) It doesn't matter who pays the council tax
- c) The ownership is not relevant to the type of EPC, only to who is responsible for providing it
- d) Being used as a HMOs is not a determining factor. HMOs do not require commercial EPCs if they are HMOs in relatively unaltered domestic type properties. Those HMOs should be done using RdSAP, not SBEM (see section 2). HMOs are very specific types of tenancies, but the EPC is based on the building, not the tenancy.

The thing you should base your decision on:

Do the "units" concerned qualify as self-contained dwellings?

- a) If the "units" each have their own entrance, cooking, sleeping, toilet and shower/bath facilities for their exclusive use they each need an EPC and it will be a RdSAP EPC.

In this case, there are also likely to be landlord's areas that (should an EPC be required for those parts) would be a SBEM EPC just for those parts.

- b) If any of the above (cooking, sleeping, toilet and shower/bath facilities) are shared with the occupiers of other "units", or if the "unit" cannot be accessed without passing through a different "unit" (which could be domestic or non-domestic), it is not a self-contained dwelling.

If you need to pass through shared access areas (landlord areas) to reach the door of your self-contained dwelling, it is still a self-contained dwelling. It is only if you have to pass through a different "unit" that the "separate entrance" requirement is not met and it ceases to qualify as self-contained.

In this case it cannot be assessed using RdSAP and may potentially (subject to other considerations) be assessed as a SBEM EPC for the unit. It is likely however to be more appropriate to assess it as part of a single SBEM EPC for all the units that are not self-contained dwellings, together with any landlord's areas.

Consider the possibility that it has a mix of unit types. You could have some that are self-contained dwellings that require RdSAP EPCs. Others may be rooms accessing shared facilities that would fall within non-dwelling category and be part of a SBEM EPC.

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An example would be a pub with letting rooms and landlords accommodation. The letting rooms will be part of the SBEM EPC for the pub. The landlords accommodation (provided it has a separate entrance (and cooking, sleeping, toilet and shower/bath facilities not shared with the pub) will require a separate RdSAP EPC.

## **2) RdSAP or SBEM for domestic dwelling type properties with living accommodation for multiple occupiers/tenants.**

The primary variation from the guidance above would be what is essentially a domestic property (dwelling) designed or modified to accommodate a single household. If the property has not been significantly altered, such that it remains suitable to be occupied by a single household, it remains a domestic property. Provided it retains the characteristics of a self-contained dwelling it should still be assessed as a dwelling using RdSAP.

Only if a building that was designed or modified to accommodate a single household has been significantly altered, such that it would now require significant alteration again to be suitable to be occupied by a single household, should it be assessed using SBEM.

This scenario is most likely to be seen in the case of small houses in multiple occupation (HMOs). The fact that a house is not currently occupied by a single household, does not on its own alter its designation as a property designed or modified to be occupied by a single household.

It is the type of property and not the type of tenancy that determines the type of EPC. Unless significantly altered, what was a family home but is currently being used as a HMO should still be assessed using RdSAP.

### **Disclaimer.**

Hopefully this will provide some clarity and assist in deciding which type of EPC is appropriate.

Ultimately the arbiters of your decision are your accreditation scheme, and their decision is the final one. The above does not override any guidance or instruction you are given by your scheme. However, we have been actively involved in the conversations between schemes about this topic so believe the above should be consistent with the advice you get from any of them.

(Should you receive guidance from a scheme which contradicts the guidance above, please let us know. In that instance we can explore the reasons and either update this guidance or challenge the scheme to justify or correct theirs).

This guidance is believed to be correct at the date of writing but may not remain correct should conventions or cross scheme guidance be altered.

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