



Consultation Response

National Energy Action (NEA) response to 'Improving the Energy Efficiency of Socially Rented Homes in England'

About National Energy Action (NEA)

National Energy Action¹ works across England, Wales, and Northern Ireland to ensure that everyone in the UK² can afford to live in a warm and safe home. To achieve this, we aim to improve access to energy and debt advice, provide training, support energy efficiency policies, local projects and co-ordinate other related services which can help change lives.

Background to this response

There are approximately 4.1 million households in the social rented sector in England, with around 13% of those households living in fuel poverty³. Social renters are especially vulnerable to rising energy prices and the impact of fuel poverty, due to their financial vulnerability. For example, nearly half (47%) of social housing residents fall within the lowest income quintiles, and only three in ten (28%) have savings⁴.

Energy efficiency is often the most effective way of reducing bills, given the UK's cold, damp and leaky housing stock, as the more efficient a home, the less energy it takes to heat. However, social housing tenants have limited agency to install energy efficiency measures. In 2024, around a quarter (24.1%) of homes in the social housing sector had EPC rating between D and G⁵, and 10% of homes in the social rented sector are non-decent, meaning they fail the decent homes standard⁶.

Although social renters are more likely to live in energy efficient homes than other tenure types, the impact is especially severe when they are not. Over half (54.5%) of social renters in households with D-G ratings are fuel poor⁷ and six in ten (61%) of social renters reported that they were likely to ration their energy between February and May 2025. This is especially concerning for the safety of these tenants, given that nearly six in ten (59%) social rented households include someone with a long-term illness or disability⁸, exposing them to heightened health risks associated with cold living conditions.

Improving energy efficiency is also essential in addressing damp and mould because well-heated, ventilated, and insulated homes help prevent condensation. The tragic death of Awaab Ishak in 2020 underscores the serious health risks posed by poorly maintained, energy-inefficient housing.

The proposal to ensure socially rented homes meet a minimum energy efficiency standard of EPC C or equivalent by 2030 is estimated to save residents of treated homes average bill savings of between £96 and £165 per year by 2030⁹ and could save the NHS £85 million annually from 2030¹⁰. It represents a crucial step toward improving tenant health outcomes and upholding their right to warm, safe and

healthy home whilst fulfilling the government's legally binding carbon targets. It also will allow governments to meet fuel poverty targets through accelerating energy efficient measures in the most fuel poor households.

Summary of Our Response

Our response to this consultation is based around three key themes:

- A standard, aligned with the fuel poverty target, is essential to meeting the governments statutory duties.
- Social landlords should be held to the same standards as private landlords, and neither should be penalised for delivering early against the target.
- Social landlords should have obligations to arrange smart meters to be installed in their property and for landlords to promote smart metering to their tenants.

A standard, aligned with the fuel poverty target, is essential to meeting the governments statutory duties.

National Energy Action strongly welcomes the governments' proposal to introduce a new minimum energy efficiency standard of EPC C or equivalent to the social rented sector by 2030. More than half (54.5%) of social homes with an EPC D-G in England are classified as fuel poor. Therefore, requiring upgrades to their housing stock is likely to have a significant impact on reducing fuel poverty. It is estimated that this standard will lift between 346,635- 402,715 social homes out of fuel poverty and thus is essential in meeting the governments' statutory fuel poverty target.

Requiring social landlords to comply with a minimum energy efficiency of EPC C through a standard is also essential in meeting the fuel poverty target. There are currently no minimum efficiency standards in the social rented sector. UK Government must do as much as is reasonably practicable to ensure that the enforcement date for the standard matches up with the legal target date.

To ensure that tangible benefits for fuel poor households are actualised, the enforcement of a SRS MEES should prioritise fabric performance as the primary metric. This supports a 'Warmth first' principle and is crucial in preventing social housing tenants living in unhealthy and unaffordable homes, improving their quality of life and health outcomes, and ensures this standard does not just result in carbon savings.

Already, social landlords have made significant progress to upgrade their housing stock. Since 2017 the share of social homes with an EPC rating A-C has increased from 52% to 72%¹¹ thanks to grant measures such as the Social Decarbonisation Fund. Setting a minimum energy efficient standard for the first time will build on this momentum. It will also give the sector clarity and certainty on expectations and measurable goals. This will better support the sectors' investment and planning in the sector, ensuring the deadline is met.

A mandatory requirement is, however, essential, given that some social landlords will lack motivation to invest in energy efficiency when tenants bear the cost of energy bills and endure poorly heated homes. With 10% of social housing currently falling short of the Decent Homes Standard, there is a clear need for more regulation to enforce compliance by landlords to upgrade their housing stock. The government should ensure the MEES framework has clear rules to guide landlord discretion and prevent low-cost measures that do not reduce fuel poverty being installed.

A minimum energy efficient standard in the social rented sector is also essential to meet the government's nationally determined contributions (reducing all greenhouse gas emissions by 81% by

2035). Residential buildings are responsible for around 20% of UK's total emissions¹² and improving the energy efficiency of a home reduces carbon emissions through lowering energy use and supporting the transition to low carbon heating methods. There are 4 million social homes, equating to 16% of all households¹³, therefore, ensuring energy efficiency in this sector will also align with meeting the national determined contribution statutory requirement.

Social landlords should be held to the same standards as private landlords, and neither should be penalised for delivering early against the target.

National Energy Action believes that social landlords should be held to the same standards as private landlords. Therefore, the maximum required investment under the spend exemption for the social rented sector should be set at £15,000 per property, in line with the private rented sector. As SRS providers typically have better access to grant funding than PRS providers, the £15,00 threshold can be achievable for the SRS sector with the inclusion of grant funding in the threshold. This higher threshold has multiple benefits for social housing residents. It is estimated that it would provide a benefit of £13/year for the residents. This reduces the simple payback by a year but allows residents to achieve a further 13 days of warmth¹⁴ if they would otherwise be rationing energy (which is prevalent in this sector, 61% of social housing residents expected to ration energy between February and May this year).

Social landlords should not be penalised for delivering early against the target. Therefore, properties who have already achieved an EPC (EER) rating of C prior to the introduction of the new EPC framework should be deemed as compliant until their current certificate expires or needs to be replaced. This prevents early action being disincentivised, supports proactive investment into energy efficiency and prevents unnecessary administrative or financial burdens. It also sustains progress toward the 2030 fuel poverty target and prevents delays in energy efficiency improvements. If early action is penalised; landlords might postpone upgrades until the new framework is established.

Social landlords should have obligations to arrange smart meters to be installed in their property and for landlords to promote smart metering to their tenants.

Smart meters have the potential to provide real benefits for vulnerable and low-income households. For many low-income consumers who ration energy out of fear of unexpected high bills, smart meters can provide consumers with a clear oversight of costs, making smart meters a useful tool in tackling fuel poverty. However, the proportion of social renters with smart meters, as well as those privately renting, is below those who own their own home (53% of social renters compared to 59% of owner occupiers)¹⁵. They also present huge improvements in experience for prepayment meter users, which are disproportionately prevalent in social housing.

SRS MEES provides a key opportunity to encourage smart meter rollout in the social renting sector through creating obligations and incentives for social landlords to install smart meters in their properties, as well as obligating landlords to promote smart metering to their tenants ensuring that vulnerable and low-income households are not left behind in the transition to smart metering. Promotion and campaigning are also needed to raise awareness among landlords and tenants about the benefits of smart meters.

Case Study: Social Housing Tenant¹⁶

Living in energy-inefficient housing can seriously impact the health and wellbeing of social housing tenants. As many live on a limited income, many are forced to cut back on heating, leaving their homes cold and uncomfortable, especially when their housings' energy efficiency is poor. Imogen's story below brings to attention the impact low energy efficiency can have on the most vulnerable tenants and the need for greater minimum energy efficient standards in the SRS sector.

Imogen is a social housing resident and lives with multiple health issues that can be worsened by a cold home: such as asthma, bronchitis, cancer and depression, amongst others. She has ten children who have recognised disabilities and is a carer for one of her children, who requires for the home to be constantly heated. Despite this, the extension of her home has no insulation, and mould is present in the wet room.

As a mother of ten children, on limited income and with numerous health conditions, Imogen was struggling with everyday living and didn't have enough to cover her bills describing it **'as a constant battle every day.'**

To deal with the difficulties of the cost-of-living Imogen would ration heating.

"I have had to be so stingy because I have only managed to get a couple hundred litres for all of winter and summer."

When she had to put the heating on to deal with really cold weather, she had to borrow money from family which put her into debt. Describing it as a **"vicious cycle."** She also had to cut back on food to afford energy.

As a result of rationing practices and sacrifices Imogen has had to make, she has noticed a significant negative impact on her physical health.

The impact of warmer, more energy efficient homes, on a household such as Imogen's can be hugely beneficial. When receiving support from National Energy Action with her heating. She described it as making **"A big, massive difference for my family."**, easing her worries about putting on the heat when doctors recommend her to and consequently benefiting her health.

References

¹ For more information visit: www.nea.org.uk.

² National Energy Action also works alongside our sister charity Energy Action Scotland (EAS) to ensure we collectively have a UK wider reach.

³ Department of Energy Security and Net Zero (2025) Fuel poverty detailed tables 2025 (2024 data), 27 March 2025.

⁴ Ministry of Housing, Communities and Local Government (2025) English Housing Survey 2023-24: rented sectors, 17 July 2025.

⁵ Department for Energy Security and Net Zero (2025), Annual Fuel Poverty Statistics in England, 2025 (2024 data).

⁶ Ministry of Housing, Communities and Local Government (2025) English Housing Survey 2023-24: headline findings on housing quality and energy efficiency, 30 January 2025.

⁷ Department for Energy Security and Net Zero (2025), Annual Fuel Poverty Statistics in England, 2025 (2024 data).

⁸ Ministry of Housing, Communities and Local Government (2024) Chapters for English Housing Survey 2023 to 2024: Headline findings on demographics and household resilience, 28 November 2024.

⁹ Department of Energy Security and Net Zero, Ministry of Housing Communities and Local Government (2025) Consultation on Minimum Energy Efficiency in Social Rented Sector – Consultation-Stage Impact Assessment. 2 July 2025.

¹⁰ Chartered Institute for Housing (2025) Investing in warmer social homes could save NHS £85 million a year. June 2024.

¹¹MHLG, DESNZ AND DELUHC (2025) English Housing Survey data on energy performance, heating and insulation. Last updated 17 July 2025.

¹² Department for Energy Security and Net Zero (2023), Final UK greenhouse gas emissions national statistics: 1990 to 2021, available at: <https://www.gov.uk/government/statistics/final-uk-greenhouse-gas-emissions-national-statistics-1990-to-2021>, last updated 29 June 2023.

¹³ Ministry of Housing, Communities and Local Government (2025) English Housing Survey 2023-24: headline findings on housing quality and energy efficiency, 30 January 2025.

¹⁴ National Energy Action (2024) New data reveals how much it really costs to keep your home at a safe temperature, 26 November 2024.

¹⁵Ministry of Housing, Communities and Local Government (2025) English Housing Survey 2023-24: headline findings on housing quality and energy efficiency, 30 January 2025.

¹⁶ From National Energy Action's Lived Experience Library Delivery Year (2024-2025).