ESC Response

Improving the energy efficiency of socially rented homes in England

Closing Date of Consultation: 10th September 2025

Further details and information: Improving the Energy Efficiency of Socially Rented Homes in England - GOV.UK

Consultation Questions:
Question 1: Do you agree that the government's preferred option (option 1 dual metric approach) to setting a minimum energy efficiency for the SRS is the most suitable option? • Yes • No • Don't know Please explain your answer
Yes, the 'fabric performance' metric feels like the anchor metric and therefore Option 1 should be adopted to include that always, alongside 1 of either the 'heating system' or 'smart readiness' metric.

Question 2: If you do not agree, which, if any, of the other metric options outlined would be your preferred approach to set a minimum energy efficiency standard for the SRS?
• Option 2: A fabric performance metric only, by 2030.
• Option 3: Specified dual metrics, by 2030, either:
    • Fabric Performance and Smart Readiness
    • Fabric Performance and Heating System
    • Smart Readiness and Heating System.
• Option 4A: An average of all three metrics (Fabric Performance, Smart Readiness and Heating System), by 2030.
• Option 4B: Two of the three metrics, at the provider's discretion, (Fabric Performance, Smart Readiness, Heating System), by 2030.
• None of the above
• Not applicable
• Don't know
Please explain your answer

N/A.
Question 3: Are there any other approaches to setting MEES that should be considered (such as an energy cost-based approach)? • Yes • No • Don't Know If you have selected yes, please explain your answer

No.

Question 4: If you are answering as a registered provider of social housing, after taking into account your future business plans and the provided assumptions for the requirements for the government's preferred option (option 1), which secondary metric would you most likely to choose for the majority of your housing stock?

- Smart Readiness
- Heating System
- Don't know
- Not applicable

Please explain your answer

'Heating system'. This, together with the 'fabric performance' measure, feels like more practical solutions to implement to the stock first, before then looking at 'smart readiness'.

Question 5: Do you agree with the proposal for social homes to comply with MEES by 1 April 2030?

- Yes
- No
- Don't know

Yes.

Question 6: If you answered no to Question 5, do you have a view on alternative options for setting the compliance date, for example either earlier or later than 2030?

Please explain your answer.

N/A

Question 7: Do you agree with the government proposal to set a time-limited spend exemption?

- Yes
- No
- Don't know

Please explain your answer.

Yes. It provides sufficient time to comply, with particular reference to financial planning for properties that require significant investment, tenant refusal/non engagement for work, and properties that may be sold/demolished.

Question 8: Government has considered three options for setting maximum required investment under a spend exemption. Comparing these options, which do you think is most appropriate for the SRS?

- Set it at £10,000 (Govt preferred approach)

- Set it at £15,000
- No spend exemption
- Other – please specify
- Don't know

Please explain your answer

£10,000, as financially the most viable for RPs, as per the government recommendation.

Question 9: Do you agree with government's proposal for any time limited spend exemption to be valid for 10 years from 1 April 2030?

- Yes
- No
- Don't Know

Please explain your answer

Yes, provides sufficient time to resolve any issues and comply.

Question 10: If you have answered no to Question 9, would you prefer an exemption that is valid for:

- Less than 10 years
- Over 10 years
- Don't know

Please explain your answer.

N/A

Question 11: If you are answering as a provider for social housing, based on the current condition of your stock and the anticipated costs of meeting MEES, what proportion of your housing stock would you estimate you would use the spend exemption for?

- Less than 10%
- 10-20%
- 20-30%
- 30-40%
- 40-50%
- 50% or above
- Don't know
- Not applicable

Please explain your answer.

20-30% based on age of stock and thus required investment to bring it the relevant properties up to standard by 2030, plus resolving tenant refusals/non engagement to allow the necessary work. Meaning this % would likely take longer than 2030 and need the exemption.

Question 12: Are you aware of any other specific circumstances where individual dwellings could not meet the standard, but which are not covered by either applying the DHS exemptions to MEES or the time limited spend exemption? • Yes • No • Don’t know Please explain your answer
No
Question 13: Do you agree that properties that meet an EPC (EER) rating of C prior to the introduction of new EPCs should be recognised as compliant with the future standard until their current EPC expires or is replaced? • Yes • No • Don’t Know Please explain your answer.
Yes. This allows resources to be focused on the worst performing stock and plan work sensibly.
Question 14: Do you agree with government’s proposal that, as an EPC reform transition measure, properties that have achieved EER C from the introduction of new EPCs until 1 April 2028 should be considered compliant until the property’s EPC expires, after which they would need to comply with MEES? • Yes • No • Don’t know
Yes
Question 15: If government’s proposed approach is implemented, which of the following courses of action do you think registered providers of social housing would take where homes currently meet EER C? (Subject to the new EPC system being introduced in 2026) • Renew EPCs before the introduction of the new EPC system and comply ten years later. • Renew EPCs when they expire and demonstrate compliance under EER C until required to meet MEES using new EPC metrics in the early 2030s. • Renew EPCs when they expire and demonstrate compliance with MEES immediately. • Other • Don’t know Please explain your answer.
Renew EPCs when they expire and demonstrate compliance under EER C until required to meet MEES using new EPC metrics in the early 2030s. This seems the most sensible approach, as I would anticipate the cost of renewing EPCs before the

introduction of the EPC system would be too resource intensive. This is the most cost-effective approach and is the most likely to be fulfilled.
Question 16: If the government's proposed approach is implemented, which of the following courses of action do you think registered providers of social housing would take for homes that do not currently meet EER C? • Improve homes to EER C by 1 April 2028 to demonstrate compliance under EER C for the rest of the EPC validity period, then carry out any additional work needed to meet MEES using new metrics. • Improve homes to meet MEES using new EPC metrics by 1 April 2030. • Other • Don't know Please explain your answer.
Improve homes to EER C by 1 April 2028 to demonstrate compliance under EER C for the rest of the EPC validity period, then carry out any additional work needed to meet MEES using new metrics. I think this is most likely as most RPs will be utilising Warm Homes funding to make these improvements, alongside their stock investment programmes anyway.
Question 17: If you are a registered provider of social housing or industry body, do you foresee issues arising from installing energy efficiency measures where the leasehold is owned by the registered provider but not the freehold? • Yes • No • If you have answered yes to this question, please explain your answer
Yes, could be an issue in respect of lease agreements and permissions to undertake the scope of work required, however I can't imagine freeholders having issues with these improvements. May affect shared ownership.
Question 18: If you are a registered provider of social housing or industry body, do you foresee issues arising from installing energy efficiency measures in properties where the registered provider holds the freehold but there are also leaseholders in the building (for example, through right to buy)? • Yes • No • Not applicable • If you have answered yes to this question, please explain your answer
Yes, to get works completed in a leaseholder's property then there will be section 20 consultation requirements, assessing the T&Cs of the lease, and a financial cost potentially for the leaseholder to pay. ESC are currently reviewing all leases.
Question 19: If you are a leaseholder (in a property where your freehold is owned by a social housing provider), do you support providers offering to conduct energy efficiency works in your property to meet MEES?

- Completely support
- Support to some extent
- Neither support or do not support
- Do not support
- Not applicable

Please explain your answer

N/A

Question 20a: If you are a leaseholder, have you already had energy efficiency works carried out in conjunction with a social housing provider where they are the freeholder?

- Yes
- No

N/A

Question 20b: If you answered yes to the question above, what was your experience of installation?

Please explain your answer

N/A

Question 21: Do you have any further comments on how providers can best work with leaseholders when improving energy efficiency of mixed tenure blocks?

Please explain your answer

Earliest consultation/involvement to give clarity on the benefits, listen to leaseholder's needs and concerns and aim to work together on the project. Where grant funding can help cover the costs this should be maximised, to limit financial impact on the leaseholder.

Question 22: Do you have any additional questions or concerns not answered in this consultation that we should consider when drafting the guidance and government response?

Please explain your answer

None.

Question 23: When do you plan on installing low carbon heating in your homes?

- Install in all homes in the 2020s
- Install in some homes in the 2020s, install elsewhere in the 2030s and beyond
- Install in most homes in the 2020s, install elsewhere in the 2030s and beyond
- Install only in 2030s and beyond
- Other
- Don't know

Install in some homes in the 2020s, install elsewhere in the 2030s and beyond.

Question 24: At what point will you be looking to replace failing/end-of-life heating systems with low carbon heating?

- 2020s
- 2030s and beyond

2030s and beyond

Question 25: If you have no plans to install low carbon heating in the 2020s, which options best describe why?

- Prioritising fabric improvements first
- Prioritising other non-fabric measures (such as solar PV)
- It is too expensive
- It would raise bills for tenants
- Don't know enough about it
- Waiting until current heating systems need replacing
- Other
- Don't know

We are installing some in the 2020s (based on results of stock condition survey and forthcoming retrofitting surveys) however the points above are all real factors to be considered when we do install it, and why we're not doing it quicker with the entire stock.

Question 26: In your plans for low carbon heating installation, which homes will you target first for low carbon heating? Select all that apply

- Those with failing/end-of-life heating systems
- On the gas grid
- Off the gas grid
- Higher starting EPC band
- Lower starting EPC band
- Specific housing archetypes (e.g. high rise or terrace)
- Whichever homes are most convenient to install low carbon heating in
- All properties at once
- Other
- Don't know

Off the gas grid
Lower starting EPC band
Whichever homes are most convenient to install low carbon heating in

Question 27: Do you plan to install communal low carbon heating or individual low carbon heating?

- Communal (e.g. low carbon heat network)
- Individual (e.g. one air source/ground source heat pump per home)

- A combination of the above
- We have no plans to install low carbon heating
- Don't know

Individual (e.g. one air source/ground source heat pump per home).

Question 28: What proportion of your organisation's homes do you anticipate receiving solar PV installations up to 2035?

- Installed in all homes
- Installed in most, but not all homes
- Installed in some, but not most homes
- Installed in a limited number of homes
- Installed in no homes
- Other
- Don't know

Installed in most, but not all homes.

Question 29: Which of the following do you intend to use to fund net zero by 2050?

- Self-funded through existing budgets
- Private finance specifically for decarbonisation purposes (e.g. ESG loans or bonds)
- Private finance at a corporate level
- Innovative financing models (e.g. retrofit credits, comfort charges, Heat/Energy as a Service models, Smart Export Guarantee tariffs)
- Other
- Don't know

Self-funded through existing budgets.
Greater promotion of other options would be welcomed such as retrofit credits, ESG loans etc as we would of course explore all possibilities.

Question 30: To what extent have the longer-term costs of reaching net zero in social housing by 2050 been factored into your long-term business planning?

- Not at all; we have not considered the costs of any retrofit works beyond meeting EPC C
- A little; we have done a limited amount of work to consider the costs of decarbonisation beyond EPC C
- Somewhat; we have started to consider the costs of net zero by 2050 and how to achieve this
- Substantially; we have fully considered the costs of net zero by 2050 and are working on how to achieve this
- Completely; we have fully considered the costs of net zero by 2050 and factored this into our long-term business plan
- Don't know

Substantially; we have fully considered the costs of net zero by 2050 and are working on how to achieve this.

Question 31: Were you aware of heat network zoning proposals before reading this document?

- Yes, we were aware of network zoning proposals and planning to connect some buildings to a heat network
- Yes, we were aware of network zoning proposals but not planning to connect any buildings to a heat network
- No, we were not aware of network zoning proposals but planning to connect some buildings to a heat network
- No, we were not aware of network zoning proposals and not planning to connect any buildings to a heat network

Yes, we were aware of network zoning proposals but not planning to connect any buildings to a heat network.

Question 32: What actions should government consider implementing to increase the number of smart meters installed in the social rented sector? (Select all that apply)

- Create obligations for social landlords to ensure their properties (including where there are communal energy sites) contain smart meters, regardless of whether the landlord or the tenant pays the energy bill.
- Create obligations for social landlords to ensure their properties (including where there are communal energy sites) contain smart meters, only in cases where the landlords is the energy bill payer.
- Create obligations for social landlords to arrange for smart meters to be installed in their properties (including where there are communal energy sites) during void periods and/or during retrofit projects.
- Create positive incentives for social landlords to arrange for smart meters to be installed in their properties, e.g. through SRS MEES.
- Create obligations for social landlords to actively promote smart metering to their tenants, e.g. through sharing literature.
- Support national and/or local campaign activity to engage social landlords and tenants and raise awareness of smart metering.
- Other (please specify)
- Don’t know/not sure

Create obligations for social landlords to arrange for smart meters to be installed in their properties (including where there are communal energy sites) during void periods and/or during retrofit projects.
Create positive incentives for social landlords to arrange for smart meters to be installed in their properties, e.g. through SRS MEES.
Create obligations for social landlords to actively promote smart metering to their tenants, e.g. through sharing literature.
Support national and/or local campaign activity to engage social landlords and tenants and raise awareness of smart metering.

Question 33: [Optional] Do you have any further comments or concerns regarding Minimum Energy Efficiency standards in the social rented sector or on longer term decarbonisation and net zero which have not been mentioned? Please explain your answer
None.