Department for Energy Security and Net Zero: Improving the Energy Performance of Privately Rented Homes in England and Wales

Rural Services Network (RSN) response May 2025

About Us

The Rural Services Network is an independent membership organisation that campaigns for a better deal for rural communities in England.

- We are a Special Interest Group of the LGA and provide the Secretariat for the Rural Services All Party Parliamentary Group.
- We have over 500 organisations in membership from across the public, private and third sectors.
- We represent our members at national forums including The Rural Coalition and the DEFRA Rural Impact Forum.

Rural Context

Before responding to this specific question (or the others in this Consultation) there are some overarching points we wish to make to reflect the rural context.

- In the latest fuel poverty update from the Department for Energy Security and Net Zero, a concerning pattern emerges in England's rural communities. These areas are grappling with the highest rates of fuel poverty at 12.3%, surpassing both semi-rural (10.6%) and urban (11.0%) rates. A key factor exacerbating this issue is the energy inefficiency in rural homes, which average a median fuel poverty energy efficiency rating of only 64, considerably below the national average of 70.
- Rural homes are not only larger, with a median floor area of 115m^2 compared to the overall median of 85m^2, but also more expensive to heat, leading to an annual median fuel cost of £2,740. This contributes to a pronounced fuel poverty gap of £987, highlighting the financial strain many rural households endure just to maintain a basic standard of warmth and energy.
- Despite a slight national decrease in fuel poverty rates—from 11.4% in 2023 to 11.0% in 2024—rural areas have witnessed less improvement, accentuating the pressing need for specific attention. The challenges unique to rural settings include limited access to advanced energy solutions and reliance on outdated heating technologies.
- Enhancing the energy efficiency of rural homes through upgrades tailored to their larger sizes and unique structural characteristics is essential. Additionally, increasing access to a range of renewable energy sources and modern heating technologies could significantly reduce running costs and improve living standards in these communities.
- Of the 4.5m households living in properties off the gas grid, 20.0 per cent were fuel poor compared to 11.8 per cent of households on the gas grid. These compare with 22.9 per cent and 22.0 per cent respectively in 2010, showing the reduction in fuel poverty over time has largely come from households connected to the gas grid – 53.5 per cent of homes on the gas grid were band A-C, compared with 32.3 per cent for homes off the gas grid. The average fuel poverty gap for households off the gas grid was £801, which is over twice as large as the gap for households on the gas grid (£315).

- By way of further rural context:
  - There are 1,358,570 households in predominantly rural areas which are off the gas grid. That is 25.1% of all such households and 5.46% of all households in England.

NB there are properties in urban areas that are close to the gas grid but not connected, particularly high-rise flats where gas connections present a potential fire risk.

- Across Great Britain it is estimated that 4.4 million households were not connected to the gas grid in 2021.
- Rural off-gas-grid homes are generally more poorly insulated and expensive to heat.
- The main alternative fuels are electricity, oil, solid fuel and tank or bottled gas.
- Rural populations have a higher proportion of those aged 65 and over, at 25.4% (17.1% urban). In sparse settings the figure increases to 30.7%. The proportion of those aged 85 and over is 3.3% rural and 2.1% urban.
- There are specific issues relating to premises (domestic and commercial) which are Listed Buildings and/or in Conservation Areas. They are unique to each property.
- The cost of living is higher in rural areas and workplace-based earnings are lower.
- The electricity network is fragile (especially in adverse weather conditions) with little spare capacity.

- We are concerned about the apparent 'one-size-fits-all' approach to electric heat pumps and the lack of willingness to include other alternative fuel sources.
- The Standard Assessment Procedure (SAP) methodology – and particularly the RdSAP model (a reduced form of SAP) – which is used to generate recommendations for EPCs and used to calculate a homes' energy performance needs to reflect a more diverse range of heating fuel options. It favours heat pumps where they may not be the best option (or indeed, practical for many rural properties).
- Research from the County Councils Network published in March 2024 shows "that the number of households in private and social rent has increased by over half a million in county and rural areas over the last decade, outpacing the increase in renting in London and the country's other major cities.
- Seen as the traditional location of home ownership, shire counties have seen a decrease in people purchasing homes over the last ten years, with house prices locking more and more people out of ownership. This has led to more people entering the rental market, including those in social rented accommodation – adding to pressure on local housing.
- The report provides a ten year long deep dive into housing trends into 38 county and rural areas which home 25m people in England, and finds:

  - Households renting either privately or through a social housing via a registered social landlord or a local authority in rural and county areas has increased by 19% between 2011 and 2021, a total of 550,000 extra households. This is higher than anywhere else in the country, including London and England's major cities. Rented properties – both social and private – make up almost one third (31%) of all housing in counties now.

  - There has been a dramatic rise in private renting in county areas and rural areas, with 450,000 extra households renting in 2021 compared to 2011 – a 31% increase, which is higher than London's increase of 25%.

  - This rise in renting and unaffordability of properties has numerous impacts on county and rural councils. Waiting lists for council housing in those areas has increased by 10% between 2018 and 2023 (an increase of 40,000 households), temporary accommodation use is up by 52% over the last five years (an increase in over 6,000 households) and homelessness has risen 18% over the last three years (an increase of 4,500 people).

It is against the above context that we make a call for any requirements in respect of the energy performance of privately rented homes in rural areas does not have an unintended consequence of losing large numbers of homes from the private rented sector.

1. **Do you agree with government's preferred position of using new alternative Energy Performance Certificate (EPC) metrics following EPC reform as the basis for higher Minimum Energy Efficiency Standards (MEES) for privately rented homes?**

No.

Whilst welcoming UK Government's commitment to address the current failures in the EPC methodology, the RSN concerned around the proposed timings for using the reformed EPC metrics as a legislative tool. We feel there is insufficient time to adequately consult and implement both the EPC reform and the proposed Minimum Energy Efficiency Standards (MEES) without potential negative impacts, particularly on rural landlords and homeowners.

We are also concerned that the new EPC metrics may still include a focus on cost. Whilst we recognise that fuel input cost is an important consideration to homeowners, renters and commercial tenants when buying, selling or renting a property, particularly in light of the recent energy price crisis, cost should be displayed separately and not included as part of the overall score.

It is very challenging to attempt to combine two metrics (fuel cost and energy efficiency) into one single metric within EPCs without one compromising the other. Separating out fuel cost and energy efficiency into two distinct metrics will allow the government to succeed on both fuel poverty targets and the overall decarbonisation goals without compromising one for the other and give consumers a more useful document.

Currently, the EPC rating is positioned as a measure of energy efficiency. In reality however, the rating is actually a measure of energy cost per m2. This method is particularly distorting when comparing various fuel types between similar properties. This creates a particular problem for off-gas grid properties where all fuel options (heating oil, electricity, solid fuel or LPG) are more expensive than natural gas. Off-grid properties are instantly disadvantaged as their location dictates their fuel options which automatically results in lower EPC ratings than their mains gas counterparts. An identical property built to the exact same standards will receive a much lower rating if it happens to be situated outside the coverage area of mains gas.

This disadvantage becomes particularly problematic when considering the implications of legislation such as MEES for the Private Rented Sector (PRS). To achieve an equitable standard which encourages investment in meaningful energy efficiency improvements both on and off the grid, EPCs should be calculated to encourage investment in building fabric and energy efficiency measures irrespective of a property's input fuel.

Whilst we are supportive of a fabric-first approach and recognise the need to improve the energy efficiency of our nation's buildings through appropriate and cost-effective energy efficiency measures, we do have concerns regarding the proposal and inclusion of a fabric performance metric, if not properly designed.

Consumers inherently understand that the primary function of an EPC certificate is as with ratings for other consumer products such as televisions, fridges and lightbulbs – to explain their efficiency, which EPC certificates don't currently do. Therefore, the inclusion of a fabric performance metric

within EPCs is in our view the most important aspect of the reform of EPCs and one in which consumers will rely on to make decisions about the most appropriate heating system for their home and to save money.

We also have concerns that for properties where these energy efficiency improvements are not possible – in protected, heritage buildings or those in Conservation Areas, for example – or in older, less energy efficient properties, they may be unfairly penalised by the introduction of a fabric performance metric. Many rural properties cannot be economically retrofitted to a level necessary to allow heat pumps to work effectively, therefore actions in respect of these properties need reflect a more diverse range of heating fuel options -including LPG and renewable liquid gases.

A well-designed fabric metric could help property owners make an informed decision about the most appropriate replacement or new heating system to that building. For example, if an evaluation of the retrofit options available to that property conclude that they either cannot be fitted economically or cannot bring that property up to a thermal efficiency level sufficient to allow a heat pump to work effectively then that informs the property owner that other alternatives would be more suitable to the needs of that building. EPCs currently do not offer this kind of insight, and it is imperative that the newly designed metric is able to reflect this.

Incentivising landlords to tackle energy inefficiency through improved fabric performance would help support the decarbonisation of the UK's housing stock, leaving cost considerations as a separate issue for tenants themselves, who are often the ones responsible for decisions around cost (tariffs, etc.).

Due to the way that EPCs are currently calculated, off-gas grid homeowners are disadvantaged against their grid-connected counterparts in their EPC rating. This means that off-gas grid homeowners will have to spend more money on building improvements to reach the same energy performance standard as those on the grid. If the existing EPC methodology is maintained, the inclusion of a fabric performance metric risks impacting the personal finances of hundreds of thousands of rural homeowners, more so than those connected to the gas grid. Rural households will be forced to spend more than the average £4,700 quoted, and are more likely to need to spend upwards of £20,000 to reach EPC Band C. For the private rented sector, this could in turn cause tenants' monthly rent rates to increase or encourage landlords to sell their properties, risking damage to the rental market.

Whilst we should strive for improved energy performance where possible, it is imperative that we recognise the diversity of the UK's housing stock, and ensure that individuals living in older, draughty, less energy efficient homes are not unfairly penalised due to factors beyond their control.

The RSN does not support of the principle of a heating system metric. The purposes of an EPC, a score given to the carbon intensity, fabric and cost of a fuel is sufficient information. Another metric added on top which 'shift(s) users towards environmentally friendly heating solutions' is not technology neutral and suggests an approach which favours installation of heat pumps over other low carbon technologies in situations where there may not be appropriate or practical. If a heating system metric were to be included, however, we believe that biofuels and renewable liquid gases, such as bioLPG and rDME must be included within the scope of the metric as part of the replacement for SAP fairly.

Within the Options Assessment for this consultation, it is noted that heat pumps are not a viable solution for decarbonising at least 20% of these off-gas grid homes. Further analysis by Gemserv

found that this number could in fact be as high as 36% of homes[1]. However, within Table 1 of the Options Assessment for this consultation (Proxy definitions of new EPC metrics and PRS standards used in modelling), the proxy for the heating system metric states 'property must have a heat pump'. This electrification only approach unfairly penalises off-grid, rural properties who are unable to install a heat pump or other electrification technology due to limited, poor or absent grid connection, and issues with building fabric that make it impossible for a heat pump to run effectively. We are concerned that by including this metric, the option of a mixed technology approach to decarbonisation is removed, which is vital in providing consumers with a choice in how they reach Net Zero, in a way which is fair and works for them. **It is imperative that if we are including a heating system metric within the EPC methodology, that we ensure a mixed technology approach is taken, offering consumers choice to invest in the technology and heating system that works best for their home or business. Forcing home and business owners down a one-size fits all approach to decarbonisation risks significant, unintended consequences.**

If Government does proceed with a heating system metric, then the categorisation of heating systems should be very carefully considered to ensure that optimal outcomes are not excluded by a simple and inflexible ranking system. If a ranking system is used, the Government must ensure that it does not pick a list of 'winning technologies' by selecting preferred heating systems using any other criteria than carbon emissions.

Failure to create a ranking based on carbon emissions reduction potential could result in consumers selecting heating systems that are ill-suited to their property and a sub-optimal reduction in carbon emissions. This outcome could cause consumers to install a heating system that they decide to change soon after, slowing the decarbonisation of heating.

2. Government would welcome views on options for setting future MEES against a combination of new EPC metrics. Do you agree with government's preferred approach of having a requirement to meet a primary standard set against the fabric performance metric and then a secondary standard set against either the smart readiness metric or heating system metric, with landlord discretion on which secondary metric their property meets?

We repeat that the RSN is supportive of a fabric first approach and recognises the need to improve the energy efficiency of our nation's buildings through appropriate and cost-effective energy efficiency measures. Retrofitting the UK's buildings economically and sensibly remains one of the most challenging aspects of reaching net zero.

As stated earlier, we have concerns that for properties where these energy efficiency improvements are not possible – in protected, heritage buildings or those in Conservation Areas etc, for example – or in older, less energy efficient properties, they may be unfairly penalised by the introduction of a fabric performance metric. Not all properties can be economically retrofitted to a level necessary to allow heat pumps to work effectively, therefore these properties need alternative technologies like LPG and renewable liquid gases.

Our comments in response to Q1 about a well-designed fabric metric helping property owners make an informed decision about the most appropriate replacement or new heating system to that building apply here too.

[1] Gemserv, Liquid Gas UK: The industry's journey to 2050 (2024)

We would support the design and inclusion of a rural version of the heating metric, which recognises that alternative solutions to electrification will be required and includes a more diverse range of heating fuel options

We do not support the inclusion of the heating metric in its current design. This is due to the reasons outlined in Question 1.

The RSN also has concerns around the inclusion of a smart readiness metric. Smart readiness requires adequate mobile phone connectivity which is not currently available in many rural areas. The proposed definition of smart readiness within the consultation states '*The consultation aims to ensure consumers, and the electricity system are protected while developing a competitive market for energy smart appliances and demand-side response (DSR)*. Demand side response is a built-in function that means the appliance (heat pump) can regulate itself with the grid'. This means, therefore, that this cannot technically apply to gas fired heating appliances, and so in essence they couldn't be included as a smart appliance and consequently excluded from the metric. The inclusion of a smart readiness metric excludes the possibility of a gas system run on renewable fuels such as bioLPG and rDME, which are vital as part of a mixed technology approach to ensure that rural homeowners can decarbonise their properties in a way which works for them – especially if they live in a property where it is technically or economically unfeasible to install a heat pump or other type of electric heating system.

We therefore do no support the inclusion of a smart readiness metric in its current design and believe that adaptations need to be made to ensure that the metric allows a mixed technology approach, rather than focusing on electric solutions only.

3. What are your views on the alternative approaches of:

Alternative 1: A requirement to meet a standard set against dual metrics of equal weighting. The standard would be set against dual metrics including two of the following: fabric performance, heating system and smart readiness.

Alternative 2: A requirement to meet an overarching standard set against all three metrics of fabric performance, heating system, and smart readiness, either through improvements across all standards or through landlords concentrating improvements against one or two standards.

The RSN supports Alternative 2, where landlords are offered the choice in how they make improvements. For those landlords who have older, less energy efficient properties that will not be suitable for electrification, allowing them to make improvements set against the fabric performance metric allows them to focus on a fabric-first approach, making alterations that are suitable for the property, as opposed to pushing onto them a heating technology that is expensive, and may not work effectively.

4. Do you have any alternative suggestions for how government could utilise new EPC metrics as the basis for MEES, such as a single metric approach (e.g. fabric or cost based?) Please provide a rationale with your answer.

As stated earlier, if Government were to utilise new EPC metrics as the basis for MEES, with a single metric approach, we believe that the focus should be on fabric performance and not cost.

As stated above, we do not feel that cost should be included within the EPC metrics and should instead be displayed separately and not included as part of the overall score.

A focus on a fabric-first approach would allow landlords the opportunity to address the energy efficiency of their property, in a way which is flexible and works for them.

5. Do you agree with government's proposal to increase the maximum required investment for Private Rented Sector (PRS) MEES to £15,000 per property and for landlords to be able to register an exemption if expenditure would take them over this figure? If not, please set out whether you consider a cap should apply and how; and if so, what level you consider the cap should be set at and why (whether this is the 2020 proposal of £10,000 or another figure). Please explain your answer.

No, the RSN does not agree.

The proposed increased cost cap will have a particular impact on rural, off-grid landlords, who are more likely to own less energy efficient properties, and will need to do more work in order to reach the £15,000 cap.

Landlords and homeowners will have to spend more money on off-grid homes to reach EPC Band C, compared to an identical home on the gas grid. This is unfairly and unjustly penalising rural areas, homeowners and house builders for no other reason than the fact they don't use natural gas. In rural areas this adds additional financial pressure onto fuel poor and vulnerable households.

We have additional concerns that the proposals will devalue off-grid properties, as potential homeowners and landlords may choose not to invest in rural locations due to the unfair policy penalties. It may also impact the personal finances of hundreds of thousands of rural homeowners and renters, more so than those connected to the gas grid. Rural households will be forced to spend more than the average £4,700 quoted, and are more likely to need to spend upwards of £20,000 to reach EPC Band C. For the private rented sector, this could in turn cause tenants' monthly rent rates to increase or encourage landlords to sell their properties, risking damage to the rental market.

At a time where the cost of living is at the forefront of everyone's minds, the proposed increase of the price cap to £15,000 will undoubtedly penalise off-grid landlords and renters more than their on-grid counterparts. This is especially concerning when we note that households living in rural areas have the highest rate of fuel poverty and the largest fuel poverty gap as we point out in the opening part of this response.

6. Should government extend the exemption period for the cost cap to ten years? If not, how long do you think the cost cap exemption should last? Please explain your answer.

No response

7. Do you agree with government's preferred implementation timeline to require 'new tenancies' to meet the higher standard from 2028 and 'all tenancies' to meet the higher standard by 2030? If not, do you have alternative suggestions?

No

As stated previously we are concerned with the timelines of these proposals, particularly with how they intertwine with the proposed updates to the EPC methodology. We have concerns that the EPC methodology, and therefore the MEES proposals, will be rushed to meet these ambitious targets, not allowing enough time for proper review and consultation, nor providing landlords with adequate time to implement the proposed changes.

We repeat that rural properties are often less energy efficient, and as such under the current proposals will require a raft of different measures to improve their energy efficiency and bring their rating up to EPC C. Due to the complexity and amount of measures required, rural landlords will once again be penalised by these measures, as they will require a longer timescale to enact their upgrades in comparison to on-grid counterparts, who in many cases will not need to make as many fabric upgrades to improve their EPC level.

8. Do you agree with government's proposal that, as an EPC reform transition measure, landlords should be able to demonstrate their properties are compliant with the existing standard of EPC E using their past EPC?

Agree.

9. Do you agree properties that have an EPC rating of C against the EER on EPCs before 2026 should be recognised as compliant with the future standard until their EPC expires or is replaced?

Agree.

10. Do you agree with government's proposal to require landlords to commission a new EPC before taking action to comply with higher MEES?

10.1. Should the cost of this new EPC be included within the cost cap?

10.2. Should landlords still be required to commission post-improvement EPCs? If yes, should the cost of the post-improvement EPC also be included within the cost cap?

No response

11. Should government develop an affordability exemption? If yes, what eligibility criteria would be the most appropriate for an affordability exemption? Please indicate which, if any, of the proposed approaches you support or otherwise provide alternative suggestions.

We support either a Council tax Band or Local Authority Area Based Approach.

12. Should government apply the PRS MEES Regulations to short-term lets? Please explain your answer.

No.

The current EPC methodology is primarily calculated based on full-time occupancy, where heating, insulation, and energy efficiency measures are optimized for continuous daily use. However, holiday homes have irregular occupancy patterns, meaning the EPC model does not always reflect real-world energy use.

Additionally, the more practical and cost-effective heating choices for holiday lets (condensing gas boilers, panel heaters etc.) receive poor SAP and EPC scores, meaning that an inclusion of short-term lets within the Minimum Energy Efficiency Standards Regulations would be problematic for the sector. As we understand it, the most practical heating for holiday homes (electric panel heaters, smart electric radiators) scores poorly because SAP 10 favours low-carbon heating systems like heat pumps and high heat retention storage heaters (HHRH). However, HHRHs and ASHPs are not well-suited for holiday homes, as they rely on steady, continuous operation, making them inefficient for transient use.

Holiday homes can also face additional challenges around the practicality of installing fabric improvement measures, as many holiday homes, especially older properties and those in conservation areas, face restrictions on insulation upgrades, double glazing, and external wall insulation, limiting EPC improvement options.

13. What actions could government take, including changes to the law to encourage or require smart meters in properties undergoing efficiency upgrades, to increase the number of smart meters installed in the PRS? Please provide your rationale and evidence for any suggestions for actions you have.

No response

14. Do you think the current MEES exemptions available to landlords are suitable?

14.1. Are there other circumstances, not covered by the current MEES exemptions regime, where you think government should consider making exemptions for?

No.

As stated above, we do not agree with the increased cost cap from £3500 to £15000, as explained in our answer to Question 5.

15. Do you agree with government's preferred position to keep a potential requirement on lettings agents and online property platforms under review whilst the PRS Database is being developed for properties in England?

No response

16. Do you have any new evidence to submit regarding the topics as summarised in Chapter 2 of this consultation? Please specify which topic you are providing new evidence for.

No

17. Is there any additional information or evidence you would like to provide on either the effectiveness of the existing PRS regulations 2015 and guidance, or interactions with other policies?

No, we simply reiterate the rural context as follows:

Rural Context

- In the latest fuel poverty update from the Department for Energy Security and Net Zero, a concerning pattern emerges in England's rural communities. These areas are grappling with the highest rates of fuel poverty at 12.3%, surpassing both semi-rural (10.6%) and urban (11.0%) rates. A key factor exacerbating this issue is the energy inefficiency in rural homes, which average a median fuel poverty energy efficiency rating of only 64, considerably below the national average of 70.
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- Despite a slight national decrease in fuel poverty rates—from 11.4% in 2023 to 11.0% in 2024—rural areas have witnessed less improvement, accentuating the pressing need for specific attention. The challenges unique to rural settings include limited access to advanced energy solutions and reliance on outdated heating technologies.
- Enhancing the energy efficiency of rural homes through upgrades tailored to their larger sizes and unique structural characteristics is essential. Additionally, increasing access to a range of renewable energy sources and modern heating technologies could significantly reduce running costs and improve living standards in these communities.
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  - Across Great Britain it is estimated that 4.4 million households were not connected to the gas grid in 2021.
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