



Consultation Response: Improving the Energy Efficiency of Socially Rented Homes in England

Submitted by: Rural Services Network

Role: National representative body for over 500 rural service provider organisations from across the public private and third sector. Secretariat for the Rural Services APPG, Special Interest Group of the LGA and Rural Housing Alliance partner.

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1. Overview

The Rural Services Network welcomes the Government's proposal to introduce Minimum Energy Efficiency Standards (MEES) for socially rented homes, targeting EPC B and C or equivalent. This is a vital step toward tackling fuel poverty, improving tenant wellbeing, and contributing to national net zero goals. As a Rural Housing Alliance partner we echo the points made in their consultation response.

Achieving the ambition in the consultation will require realistic timelines, targeted funding, and flexible delivery models that reflect the diversity and complexity of rural housing stock. While we support the direction of travel, we do not support full implementation by 2030. A revised target of 2035 would be more achievable, particularly for rural landlords facing higher costs and logistical barriers.

1. Key Points of Support

- **Alignment with Net Zero and Decent Homes Standard**
We support integrating MEES into the revised Decent Homes Standard (DHS) under Criterion D (thermal comfort), ensuring consistency across regulatory frameworks.
- **Focus on Fuel Poverty**
Improving energy efficiency is essential to reducing energy bills and protecting vulnerable tenants, especially in rural and off-gas grid areas.
- **Fabric-First Approach**
We endorse a "fabric-first" strategy, prioritising insulation, ventilation, and building envelope improvements before installing new technologies.

2. Concerns and Recommendations

a) Funding and Financial Viability

- Current income forecasts do not support the scale of investment required to meet EPC C across all stock.
- The cost on NPV leading to pressure to dispose of stock, will put pressure on provision of rural housing.

- We recommend:
 - A dedicated retrofit funding programme for social landlords
 - Long-term certainty on funding to support strategic planning
- Technical guidance on how MEES and Home Energy Model will work together.

b) Rural Premium

- Rural and semi-rural properties face higher retrofit costs, limited contractor availability, and logistical challenges.
- We urge Government to:
 - Recognise the rural premium in funding allocations
 - Provide flexibility in compliance timelines for rural stock

c) Stock Variation and Technical Feasibility

- Some homes, particularly older or heritage properties, may not feasibly reach EPC C without disproportionate cost or disruption.
- We recommend:
 - A risk-based approach to compliance
 - Exemptions or alternative compliance pathways for hard-to-treat homes

d) Workforce and Supply Chain Capacity

- The sector faces shortages in skilled labour and retrofit materials.
- We support:
 - Investment in training and apprenticeships
 - Development of regional supply chain hubs

e) Combined Delivery with DHS

- Members plan to deliver savings by programming combined works to meet both MEES and DHS requirements, reducing overheads and tenant disruption.

3. Conclusion

The Rural Services Network supports the ambition to improve energy efficiency in socially rented homes. However, we urge Government to adopt a pragmatic, well-funded, and collaborative approach that recognises the cost pressures and logistical challenges rural landlords face. This will ensure the policy delivers meaningful outcomes for tenants while maintaining the financial sustainability of social housing providers.

We welcome further engagement as the policy is developed and stand ready to contribute to its successful implementation.

Rural Services Network - Providing a voice for rural communities and service providers

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