



**IMPROVING THE ENERGY PERFORMANCE OF PRIVATELY RENTED HOMES
END FUEL POVERTY COALITION CONSULTATION RESPONSE
30 APRIL 2025**

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

This consultation plays a vital role in reforming Britain's broken energy system. In 2025, we urge all policy makers to understand how their decisions can affect the affordability of energy bill, avoiding discriminatory pricing, delivering longer-term reforms that bring down the cost of energy and improving the energy efficiency of homes.

Our members fully support the consultation response submitted by the Green Homes Group and Renters Reform Coalition. We would request that our support for their response is reflected in the consultation recommendations - especially in terms of rejecting the alternative approaches discussed in Question 3.

As a broad additional point, we would like to see the consultation place a greater emphasis on the needs of vulnerable groups and those with additional needs during a period of retrofit. This includes ensuring adequate advice provision and, for example, older tenants should receive the necessary support during home retrofits, including funding for essential assistance.

We also would expect to see short-term lets also covered by these regulations and as well as the EPC C standard (with £15,000 cost cap) there should be a blanket EPC E standard for all rented accommodation, with no financial cap. While a case by case exemption would be sensible for listed buildings, there should not be a blanket exception - they should achieve the highest standard possible.

In addition to these broader points and our support for the Green Homes Group / RRC response, there are additional brief points to be made on two specific questions:

Question 5

It is important that the government, local authorities and landlord organisations make sure landlords are aware of the requirement to improve the energy efficiency of homes up to a maximum of £15k even if they cannot reach EPC C.

Question 11

We would also urge the Department to treat any suggestions of an exodus of landlords from the market with deep suspicion. Historical precedent, international comparisons and opinion polls do not suggest this will be the case.

When the MEES requiring EPC E came into force in 2020, there were no signs of a mass landlord exodus. Instead, many landlords took advantage of exemptions or undertook basic upgrades (e.g. loft insulation) to comply.

Surveys by BEIS (e.g. 2021 PRS Landlord Survey) found that while many landlords express concern about the costs of meeting Minimum Energy Efficiency Standards (MEES), only a small proportion said they would exit the market due to these regulations.

Some studies (e.g. [UKERC / CREDS](#), 2021) found that some small, older, or single-property landlords considered selling rather than upgrading properties, particularly where cost-recovery was unclear or tenant turnover was low. However, the overall impact on sector size was projected to be minimal.

In America, NYC's Local Law 97 imposes carbon caps on buildings, including rental properties. And while landlords face stiff fines for non-compliance, the [evidence shows](#) that they are mostly retrofitting [rather than](#) exiting the market. In Australia, the Minimum Standards in Victoria (2021) [include](#) efficient heating and insulation. Studies from [Australian Housing and Urban Research Institute](#) and state government reports show compliance improving and rental supply remaining stable.

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 100 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Action with Communities in Rural England](#), [ACE Research](#), [Advice for Renters](#), [AgeUK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), [Bruton Town Council](#), [Camden Federation of Private Tenants](#), [Carers Trust](#), [Child Poverty Action Group](#), [Church Poverty Action](#), [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), [EBICO](#), [Energise Sussex Coast](#), [Energy Advice Line](#), [Energy Cities](#), [Epilepsy Action](#), [Exeter Community Energy](#), [Fair Energy Campaign](#), [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), [Fuel Poverty Research Network](#), [Generation Rent](#), [Good Law Project](#), [Greenpeace](#), [Groundwork](#), [Hackney Foodbank](#), [Heat Trust](#), [Home Start Oxford](#), [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), [London Borough of Lewisham](#), [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), [Moorland Climate Action](#), [National Pensioners Convention](#), [National Union of Students / Students Organising for Sustainability](#), [NCB](#), [National Energy Action](#), [New Economics Foundation](#), [National Federation of Women's Institutes](#), [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Plymouth Community Energy](#), [Redcar & Cleveland Council](#), [Repowering London](#), [Retrofit Bruton](#), [Right](#)

To Energy Coalition, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stop The Squeeze](#), [Tamar Energy Community](#), [Thinking Works](#), Uplift, [UNISON](#), Warm & Well North Yorkshire, [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#) and the [Renters Reform Coalition](#). We work closely with [Energy Action Scotland](#), [NEA Wales](#) and the [Fuel Poverty NI coalition](#). The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#).

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