

IMPROVING THE ENERGY PERFORMANCE OF SOCIALLY RENTED HOMES END FUEL POVERTY COALITION CONSULTATION RESPONSE 10 SEPTEMBER 2025

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

As part of this consultation we urge all policy makers to understand how their decisions can affect the affordability of energy bills, avoiding discriminatory pricing, delivering longer-term reforms that bring down the cost of energy and improving the energy efficiency of homes.

The End Fuel Poverty Coalition welcomes the Government's commitment to improving energy efficiency in the socially rented sector. We support ambitious, enforceable targets aligned with net zero and fuel poverty goals and urge that improvements prioritise the coldest, dampest homes first ("worst first") to protect vulnerable residents.

We therefore support the move to introduce Minimum Energy Efficiency Standards (MEES) for social rented homes in England.

In line with our response on the Private Rented Sector MEES consultation earlier this year (see this pdf), we would urge the Government to:

1. Adopt a robust "fabric first" standard

The primary standard for socially rented homes should be based on fabric performance, with a requirement to complete all cost-effective insulation and ventilation measures before 2030. A secondary standard (e.g. heating system efficiency) should not be used to bypass essential insulation upgrades.

2. Fair and sufficient investment levels

Adequate funding per home must be secured to deliver deep retrofit, indexed annually for inflation, with grant-funded works additional to baseline landlord investment. Of course, uniquely to this sector will come the need for a significant increase in grant funding if it is to meet the targets. We already know that this has been proposed by the Government, but we place on record the importance of this funding.

3. Protection for tenants

Social tenants must be protected from any harm or detriment following retrofit works. Works should be delivered with minimal disruption, accessible communication, clear timelines and with tailored support for residents with disabilities, health conditions, or other vulnerabilities.

4. Enforcement and accountability

The Regulator of Social Housing should require robust delivery plans from providers and monitor progress against them. Local authorities should also have the ability to support enforcement in partnership with the regulator, with ring-fenced resources for compliance checks.

5. Integration with health and fuel poverty objectives

Energy efficiency works should be targeted in partnership with health and social care services, enabling referrals from GPs and social workers for households in cold, damp homes. This will deliver both energy efficiency impacts and public health benefits.

6. Tenant advice and engagement

Government should fund and support tenant communications on retrofit works, backed by national guidance, independent advice services and regional advice hubs to provide social, technical and financial information.

7. Timetable certainty and policy clarity

We would strongly oppose the timeline and compliance target slipping beyond 2030, as this would put the statutory fuel poverty target at real risk of failing and delay action to tackle cold homes.

Improving socially rented homes is a crucial step towards ending fuel poverty, cutting carbon emissions, and reducing NHS costs. The Government should ensure ambitious targets, adequate funding, tenant protections, and strong enforcement, with delivery prioritised for those most in need.

We look forward to being updated on this consultation as it progresses.

About the End Fuel Poverty Coalition

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