

Improving the Energy Efficiency of Socially Rented Homes in England

10 September 2025

Scope of the consultation

This consultation seeks views on the implementation of new Minimum Energy Efficiency Standards (MEES) for the social rented sector at Energy Performance Certificate (EPC) Band C or equivalent by 2030. It covers the following areas: • Setting a Minimum Energy Efficiency Standard • Addressing Implementation Issues • Longer-term Decarbonisation and Net Zero

Demographic Questions: In which capacity are you responding to this consultation?

Charity, NGO or campaign group

If you are responding on behalf of an organisation, please specify which organisation: [free text]

The Almshouse Association

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?

- **No**

Please explain your answer

NO

While we support higher energy efficiency across the sector, a mandatory *dual metric* is too rigid for heritage and charitable housing. Many almshouses are listed or traditional buildings where fabric upgrades are not always suitable and may cause moisture or structural risks. A dual requirement risks penalising providers of this type of housing who cannot reasonably comply and would lead to disproportionate costs being directed away from other resident needs. A more flexible framework is needed that sets a clear standard but recognises that different property types will have different pathways to improvement.

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

Option 4B

This option offers the right balance of ambition and flexibility. It acknowledges that while a fabric-first approach is desirable for many, it is not always feasible for heritage or listed buildings where intrusive insulation measures could damage historic fabric or create moisture risks. Allowing

providers to select **two of the three metrics** enables almshouses to choose the most appropriate pathway: for example, combining fabric and heating system upgrades in some courts, or fabric and smart readiness in others. Crucially, it avoids a “one size fits all” mandate and instead supports genuine efficiency improvements tailored to stock type, resident profile, and financial capacity.

Question 3: Are there any other approaches to setting MEES that should be considered (such as an energy cost-based approach)?

- **Yes**

If you have selected yes, please explain your answer

YES

We strongly recommend consideration of a cost-based or affordability-linked metric, reflecting the financial limits of small charities. Many almshouses charge maintenance contributions as low as £35 per week, with little ability to borrow. A cost- or rent-level metric would prevent unfair burdens on low-income providers, while still driving meaningful improvements. This would allow almshouses to prioritise energy-efficiency upgrades within their financial constraints. Given the reliance of many almshouses on charitable funding and volunteers, a cost-based metric would help ensure that improvements can be made in a financially sustainable way. This could be scaled depending on the size of the charity or type of dwellings – 80% of almshouse charities have no more than 20 dwellings and nearly 35% of almshouse charities provide accommodation in Listed buildings. A cost-based model — potentially linked to lifecycle carbon savings or energy bill reductions — could help align MEES with both fuel poverty and net zero objectives.

For heritage properties where fabric measures may not be viable, allowing landlords to improve via other routes (e.g. heating or smart systems) is essential. However, the system must avoid incentivising minimum-effort compliance. Clear communication and training are vital.

The Almshouse Association would prefer a more adaptable framework that focuses on achievable improvements. Concentrating improvements on one or two standards might be more practical, but we recommend that providers be allowed flexibility in how they approach this.

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

Not applicable

Whilst the Almshouse Association itself is not a registered provider, a small but important proportion of our member charities are. The diversity of almshouse stock means that no single secondary metric is suitable across the board. For some almshouses, upgrading heating systems will be the most practical and beneficial route; for others, smart readiness measures will be more achievable. A universal requirement would fail to reflect this variation. In addition, many almshouse residents are older and may struggle with digital or smart technologies, meaning any

smart-readiness pathway must remain optional rather than mandatory.

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

- Yes
- **No**
- Don't know

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.

The Almshouse Association believe it would be better to align the new MEES with the wider Decent Homes Standard timeline. This avoids "regulatory stacking" and allows charities to manage costs responsibly.

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

- Yes

Please explain your answer.

YES

This is essential for small providers where further works would be disproportionate. Many almshouses simply cannot spend beyond a threshold without undermining viability. A time-limited spend exemption is essential, particularly for charities and providers with heritage stock. Many almshouse properties face physical and planning barriers that make upgrades disproportionately expensive. Without a spend exemption, charitable landlords could be forced to commit unaffordable sums at the expense of resident services. A clear, simple exemption that caps spending while still requiring reasonable improvements would help protect vulnerable providers, ensure proportionality, and allow resources to be targeted towards homes where the greatest gains are possible.

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

- **Other – please specify**

We opposed the increase to £15,000 in the PRS consultation, and the same applies here. £10,000 would also be challenging for charities reliant on voluntary income and historic assets that cannot be sold.

In the private sector, landlords may recoup investment through increased rents or asset value; in contrast, almshouses are permanent endowments that cannot be sold, and the weekly maintenance contributions are deliberately kept well below market levels for public benefit. Raising the cap higher - such as to £15,000 - would create a disproportionate burden on charitable providers without delivering commensurate benefit. Recognising increasing costs of a cap now standing at £3,500 to include VAT a £5,000 (to include VAT) cap recognises both the financial reality and the unique role of almshouses in housing vulnerable older people. It is worth remembering that some

small charities offer say 6 homes the cap could quickly become unaffordable at £10,000 per dwelling.

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**

Please explain your answer

YES

This reduces administrative burden for small charities and provides certainty for long-term planning. A ten-year exemption period strikes the right balance between providing certainty for landlords and ensuring progress towards higher standards. For smaller charities with limited administrative capacity, a shorter exemption would create a heavy burden of repeated applications and renewals. A decade-long window allows landlords to plan strategically, spread costs, and manage projects alongside routine maintenance cycles. At the same time, a ten-year period is finite, ensuring that landlords remain committed to improving energy efficiency wherever feasible.

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.

Although The Almshouse Association does not hold housing stock, we estimate that some almshouse dwellings may need to rely on the spend exemption. These are typically listed buildings, very small or unusual dwellings, or almshouses where invasive works would be highly disruptive to elderly residents. The majority of stock could make reasonable improvements within the cap, but a significant minority will require exemption in order to remain viable.

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

Please explain your answer

YES

We recommend further exemptions or flexibilities in three areas:

1. **Heritage and conservation restrictions** — where Listed Building Consent or conservation requirements prohibit or severely limit measures such as external wall insulation, solar panels, or window replacement.
2. **Charitable status and affordability** — almshouses provide below-market housing as a public good, often at 30–50% of local market rents. Their financial model should be recognised as distinct from commercial landlords.
3. **Administrative burden** — the current exemption register is complex and poorly understood by smaller providers. A simplified and more user-friendly process is needed, with explicit recognition of charitable landlords.

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

Please explain your answer.

YES

Properties that have already achieved an EPC C under current rules should be recognised as compliant until the certificate expires. This avoids penalising proactive landlords who have already invested in upgrades and ensures resources are not wasted on premature reassessment.

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

Please explain your answer.

YES

This transitional arrangement would provide clarity and continuity. It ensures that investments made in good faith under the existing framework are respected and avoids creating a sudden compliance cliff edge.

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 approach is the most proportionate and practical. It avoids the unnecessary cost and administrative burden of commissioning new EPCs ahead of schedule, which would divert scarce resources away from actual improvement works. Recognising EER C ratings until their natural expiry provides stability for landlords who have already invested in achieving this standard, ensuring they are not penalised for acting early. It also creates a clear and manageable compliance pathway, giving landlords time to plan for the introduction of the reformed EPC system in the early 2030s. For charitable almshouse providers, who operate with limited reserves and often on heritage stock, this flexibility is vital to ensure compliance is achieved sustainably and without detriment to residents.

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

This staged approach is the most practical and achievable, particularly for small charitable landlords managing heritage or traditional properties. Reaching EER C by 2028 provides a clear interim target that drives early improvements in energy efficiency and resident comfort, while allowing time to plan for the transition to the new EPC metrics. It avoids creating a sudden "cliff edge" in 2030 that could overwhelm providers, supply chains, and planning authorities. Importantly, it also respects the investments already being made under the current EPC system, ensuring that works undertaken now are recognised until the certificate's expiry. For almshouses, this pathway balances ambition with financial and technical reality, enabling providers to continue delivering affordable housing without being forced into unachievable deadlines.

Questions 17 – 21 not applicable

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

We would highlight several areas where further clarity and support are required:

- **Planning and heritage approvals:** guidance for local planning authorities and conservation officers would help streamline decision-making and avoid inconsistent outcomes.
- **Interaction with Awaab's Law:** requirements to remediate damp and mould must be coordinated with MEES timescales, as under-heating and poor insulation are linked.
- **Estate-level compliance:** almshouse courts often function as integrated estates. Allowing compliance to be assessed across a group of dwellings would improve efficiency and deliver better outcomes.
- **Affordability exemption:** a rent-level approach should be considered to reflect the charitable, below-market nature of almshouse housing.

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

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

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

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

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

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

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

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

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

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

Please explain your answer

We recommend positive incentives rather than mandates. Options include grants or discounts for landlords who install smart meters during voids or retrofit programmes, and national awareness campaigns aimed at both providers and residents. For elderly residents, usability and training are critical. Mandating smart meters without these supports risks confusion and disengagement.

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

The Almshouse Association supports the government's ambition to decarbonise the social rented sector, but we emphasise the need for flexibility and proportionality for smaller charitable landlords with heritage stock.

In relation to **low-carbon heating (Q23–27)**, our members anticipate a phased approach: replacing systems at end of life, prioritising off-gas properties, those with failing systems, or homes with the lowest EPC ratings. Some almshouse courts may be well-suited to communal low-carbon heating systems, while dispersed cottages may require individual solutions such as small-scale heat pumps. The sector is committed to making progress in the 2020s where feasible, but widespread adoption will largely fall in the 2030s as fabric upgrades are completed and costs stabilise. Deferral in some cases is necessary to avoid premature installations that increase running costs for low-income older residents.

On **solar PV (Q28)**, installation will be possible in some, but not most, almshouse homes due to heritage, structural, and orientation constraints. Where viable, communal PV systems may be the most efficient route to deliver benefits to groups of residents.

In terms of **funding (Q29–30)**, almshouses lack the ability to raise rents or capitalise on asset appreciation. Funding must therefore come from a mix of small reserves, targeted government grants, and philanthropy. Larger almshouse charities are beginning to plan for long-term costs, but smaller ones often lack capacity, highlighting the need for guidance and support with stock condition planning.

On **heat-network zoning (Q31)**, awareness is mixed. Some almshouse are located in urban centres may be well placed to connect to future heat networks, but many rural almshouses will be excluded. Engagement with the charitable housing sector will be important to ensure opportunities are not missed.

Finally, regarding **smart meters and smart readiness (Q32)**, incentives and education are preferable to mandates. Grants or discounts could support installation at void or retrofit stage, and awareness campaigns could help reassure older residents. Many elderly residents may struggle with digital systems, and poor connectivity in rural areas remains a barrier. Flexibility is vital to ensure residents benefit without being disadvantaged.

In summary, the Almshouse Association calls for:

- A **flexible, fabric-first approach** to MEES with exemptions for heritage and charitable stock.
- A **£5,000 cost cap** and a **10-year exemption period**.
- Transitional recognition of **existing EPC C** ratings until expiry.
- Clearer guidance on planning and heritage approvals.
- Funding mechanisms that reflect the financial realities of charitable landlords.
- Incentives for smart technologies, rather than blanket requirements.
- A phased approach to low-carbon heating and solar PV, prioritising resident affordability and comfort.

This balanced pathway will enable almshouses to contribute meaningfully to Net Zero while continuing their centuries-old mission of providing affordable housing for older people in need.