

Response ID ANON-68T2-FNHX-8

Submitted to Improving the energy performance of privately rented homes in England and Wales - 2025 update
Submitted on 2025-04-30 14:50:10

Introduction

We usually publish a summary of all responses, but sometimes we are asked to publish the individual responses too. Would you be happy for your response to be published in full?

Yes

How did you hear about this consultation?

How did you hear about this consultation?:
GOV.UK alert

Other (please specify):

About you

Are you responding as/on behalf of (select all that apply):

Energy efficiency service providers

If other, please outline below:

If responding as a member of public, are you a:

If other, please outline below:

If you are responding as a member of the public/a building professional, what region are you responding from?

If other, please outline below:

If responding on behalf of a business/organisation, what is the name of your business/organisation?

Organisation:
Agility Eco Services Limited

If you are responding on behalf of a business/organisation, where is your business/organisation based or registered?

London

If other, please outline below:

Consultation questions

Question 1: Do you agree with government's preferred position of using new Energy Performance Certificate (EPC) metrics following EPC reform as the basis for higher minimum energy efficiency standards (MEES) for privately rented homes?

Agree

Please expand on your response here in 1500 characters or less.:

AgilityEco agrees with the government's preferred position to use the new EPCs as the basis for MEES.

Question 2: Government would welcome views on options for setting future minimum energy efficiency standards against a combination of new Energy Performance Certificate (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?

Agree

Please expand on your response here in 3000 characters or less.:

AgilityEco agrees with the government's preferred approach to prioritise the installation of fabric recommendations on an EPC. We recognise that there may be instances where this is difficult to implement (e.g. external wall insulation on a flat in a shared block) but trust that the process or prioritisation and exemptions would allow this kind of issue to be resolved.

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

Please select your preferred option:

Neither

Please expand on your answer in 3000 characters or less.:

AgilityEco does not support either alternative approach. We believe that this could enable landlords to implement measures which have a limited impact on reducing energy use and therefore tenants' bills.

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

No

Please expand on your response here in 3000 characters or less.:

Consultation questions (cont.)

Question 5: Do you agree with government's proposal to increase the maximum required investment (cost cap) for private rented sector minimum energy efficiency standards 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.

Agree with increasing the cost cap to £15,000

Please expand on your response here in 3000 characters or less.:

AgilityEco SUPPORTS the proposed increase, which will allow meaningful improvement to the majority of PRS properties, whilst recognising that a small minority will be prohibitively expensive to improve. The figure of £15,000 should rise with inflation on a yearly basis to avoid unfairness to landlords that undertake works promptly.

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

No

Please expand on your response here in 3000 characters or less.:

AgilityEco OPPOSES the proposed increase in exemption period. There is an urgent need to improve building energy efficiency in order to reduce carbon emissions and achieve energy security. Retrofit technologies are improving rapidly and both grant-funded schemes and privately funded options are likely to change within a five-year timescale.

Consultation questions (cont.)

Question 7: Do you agree with the 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?

Agree

Please expand on your response here in 3000 characters or less.:

AgilityEco AGREES with the proposed timeline, subject to the Government's complementary ambitions for the Warm Homes Plan and EPC reform being delivered on time. Tenants deserve improved homes, and achieving the higher standard by 2030 will be crucial in achieving the fuel poverty target for England. But landlords and tenants must have access to appropriate advice, a supply chain with sufficient capacity and an appropriate blend of grant funding and private finance options to ensure that the work can go ahead.

Question 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?

Disagree

Please expand on your response here in 3000 characters or less.:

AgilityEco DISAGREES with the proposal that an existing EPC rating will be acceptable, as our experience is that many existing EPCs are inaccurate. Assuming that the new framework is in place and sufficient DEAs are trained to the necessary standard, then landlords should be required to commission a new survey.

Question 9: Do you agree properties that have an EPC rating of C against the Energy Efficiency Rating (EER) on Energy Performance Certificates (EPCs) before 2026 should be recognised as compliant with the future standard until their EPC expires or is replaced?

Disagree

Please expand on your response here in 3000 characters or less.:

As for Q8 above, AgilityEco DISAGREES with the proposal that an existing EPC rating will be acceptable

Question 10: Do you agree with government's proposal to require landlords to commission a new Energy Performance Certificate (EPC) before taking action to comply with higher minimum energy efficiency standards (MEES)?

Agree

Please select:

No

Please expand on your response here in 1500 characters or less.:

The cost of the EPC should NOT be considered part of the cost cap. The cap is there for improvement measures only – the cost of the EPC is part of the cost of doing business as a landlord.

Please select:

Yes

Please expand on your response here in 1500 characters or less.:

Landlords SHOULD be required to commission and lodge a post-improvement EPC, to evidence compliance with MEES and ensure that the EPC register is up to date. Data collected as part of the pre-improvement EPC can be used to support the completion of the post-improvement EPC, so costs can be reduced. The supply chain is likely to develop innovative solutions to support landlords through the survey and installation process.

Consultation questions (cont.)

Question 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.

No

If yes, please select which proposed approach you support::

Please expand on your response here in 3000 characters or less.:

AgilityEco would NOT support an affordability exemption. This would unfairly disadvantage tenants in poorer areas and impede the improvement required to private housing stock to meet fuel poverty and net zero goals. However, this does need to be coupled with appropriate grant-funded schemes (which will be focused in areas of high deprivation/low rent) and access to appropriate finance options so that landlords are not required to provide all the necessary capital up-front for the works to be done.

Question 12: Should the government apply the private rented sector (PRS) minimum energy efficiency standards (MEES) regulations to short-term lets? Please explain your answer.

Yes

Please expand on your response here in 3000 characters or less.:

AgilityEco SUPPORTS the application of MEES to short-term lets. This will avoid an unfair burden on landlords renting their properties out for the longer term, and reduce the risk of further loss of long-term rental properties to the short-term market.

Question 13: What actions could the 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 private rented sector (PRS)? Please provide your rationale and evidence for any suggestions for actions you have.

Please expand on your response here in 3000 characters or less.:

This issue is important and wider than just the private rental market. Further market penetration of smart meters is required to support the continued rollout of renewable energy generation and to allow households to take advantage of time of use tariffs. Government must work with DSOs and suppliers to accelerate the rollout of smart meters to as many homes as possible through a coordinated national campaign, including better awareness raising of the benefits. The onus should not be on private landlords and tenants.

Question 14: Do you think the current minimum energy efficiency standards (MEES) exemptions available to landlords are suitable?

Yes

Please expand on your response in 1500 characters or less.:

AgilityEco believes that the current exemptions ARE suitable, but they need to be agreed and overseen by local authorities that have sufficient staffing expertise and resource. At present there is widespread non-compliance with MEES because councils do not have sufficient trained staff to effectively hold landlords to account.

Yes

Please expand on your response here in 1500 characters or less.:

It might be helpful for local authorities to allow further exemptions on a case by case basis for unusual situations. If this power was granted and effectively implemented then it might become a 'catch-all' process that could avoid the need for so many separate exemptions.

Consultation questions (cont.)

Question 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 private rented sector (PRS) Database is being developed for properties in England?

Disagree

Please expand on your response here in 3000 characters or less.:

AgilityEco DISAGREES with the proposal to defer an obligation on letting agents and property platforms until the expected database is introduced. EPCs offer important information to tenants and they should not be disadvantaged whilst the database is not available.

Question 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

Please expand on your response here in 3000 characters or less.:

Question 17: Is there any additional information or evidence you would like to provide on either the effectiveness of the existing private rented sector (PRS) regulations 2015 and guidance, or interactions with other policies?

No

Please expand on your response here in 3000 characters or less.: