

**Rt. Hon Michael Gove**  
**House of Commons**  
**London**  
**SW1A 0AA**

***Open Letter to Secretary of State for Levelling Up, Housing and Communities Rt. Hon Michael Gove, coordinated by Warm this Winter Coalition***

Dear Secretary of State,

We are writing as a group of 33 NGOs, consumer groups, fuel poverty organisations, installers, energy companies, financial institutions, housing organisations and trade bodies - coordinated by the [Warm This Winter](#) campaign - to encourage the government to move forward with necessary regulations to improve energy efficiency standards within the private rented sector.

There is a strong case for strengthening Minimum Energy Efficiency Standards to upgrade homes in the private rented sector to EPC C by 2028, in line with previous government proposals which were consulted on over two years ago.

Privately rented homes in the UK are some of the dampest and leakiest in Europe, costing renters and taxpayers billions because of poor insulation and substandard housing conditions. Seven million households spent this winter in fuel poverty and will be facing the same crisis next winter. [Citizens Advice](#) showed that 31% of renters feel unable to heat their home to a comfortable temperature, while 1.6 million children in privately rented homes are living in cold, damp or mouldy homes. Each year, the NHS spends an estimated [£1.4 billion](#) on treating illnesses associated with living in poor housing, which is often cold and damp. The average tenant is facing annual energy bills that are £350 more expensive due to poor insulation, while people living in the least efficient homes are paying £950 extra a year. A recent [study](#) by the Energy and Climate Intelligence Unit also highlighted that the delay in confirming new energy efficiency standards for the private rented sector could cost private renters an additional £1bn in energy bills.

Long-term certainty provided by a clear timeline for the introduction of higher standards will help landlords to plan and invest in their properties as required. Landlords can already benefit from a range of government support (including the Energy Company Obligation and the Boiler Upgrade Scheme, and the Home Upgrade Grant), and the government could consider further incentives to support landlords to make the necessary changes.

We note certain issues which have been reported as holding back government decision-making, and address these below:

- ❖ **The risk of a 'landlord exodus' due to tighter regulations:** We note that while there are concerns that landlords are leaving the market, and worsening the housing crisis being experienced by renters, [official data](#) does not back this up. Data from the English Housing Survey also shows that the number of private renting households rose in England by 177,000

from 2021 to 2022. While some landlords are selling up, others are expanding their portfolios, and therefore the overall number of properties in the Private Rented Sector remains fairly consistent.

- ❖ **The use of Energy Performance Certificates (EPCs):** It has been noted that EPCs, like any assessment tool, have limitations when it comes to measuring the carbon savings associated with retrofit, and therefore reform is needed before new regulations are proposed. However, they are widely accepted as a good measure of likely energy costs. We note that EPC reform is already underway, and is likely to be accelerated and completed before regulations are due to be introduced. There are simple measures that landlords can take to boost the efficiency of homes which will lead to guaranteed bill savings, such as loft insulation, double glazing, and cavity wall insulation.

Reducing energy demand through energy efficiency measures will be a crucial step in building resilience against international fuel prices, improving energy security, and cutting carbon emissions, alongside more cheap, homegrown renewables. There is widespread public support for this, as evidenced by our recent polling conducted with YouGov: 72% of respondents agreed that the UK needs a proper plan to phase out gas through upgrading homes with better insulation, heat pumps, and the rollout of renewable energy.

We'd be pleased to set up a meeting with our team of policy experts to discuss these matters in more detail. We look forward to hearing from you

Yours sincerely,

#### SIGNATORIES

<i>NAME</i>	<i>ORGANISATION</i>	<i>JOB TITLE</i>
Gillian Cooper	Citizens Advice	Head of Energy Policy
Matt Copeland	National Energy Action	Head of Public Affairs
Juliet Phillips	E3G	Senior Policy Advisor - Clean Economy
Simon Francis	End Fuel Poverty Coalition	Coordinator, EFPC
Giles Bristow	Ashden	Interim CEO
Sue Riddlestone OBE	Bioregional	CEO
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Luke Murphy	IPPR	Associate Director

Joan Edwards	The Wildlife Trusts	Director of Policy and Public Affairs
Leo Murray	Possible	Director of innovation and engagement
Joe Cole	Advice for Renters	CEO
Areeba Hamid	Greenpeace UK	Co-Executive Director
Jelly Moring	Parents for Future UK	Organiser, PFF UK
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Alice Harrison	Global Witness	Strategy Lead
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Richard Winder	Handelsbanken	Head of Sustainability
Charlotte Harrison	Skipton Building Society	CEO of Home Financing