



# THE ELMHURST ALMANAC 2025

A seismic shift for building energy performance

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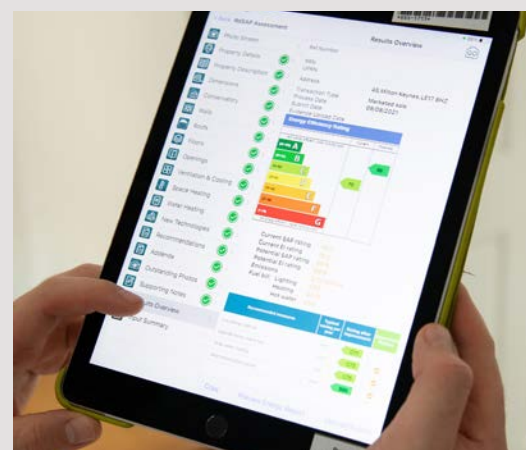
Proposed reforms to Energy Performance Certificates (EPCs), regulations, and developments in standards and calculation methodologies, will make for a busy year ahead. As the UK looks to energy efficiency professionals for advice and guidance, Elmhurst will continue to make our collective voice heard, providing you with the support and training to meet the challenges ahead.



## Introduction



Stuart Fairlie, Managing Director, Elmhurst Energy



**In 2024, everywhere we went the EPC was being talked about. It seemed everyone was using the tool to benchmark and measure the UK's progress on energy efficiency of domestic and non-domestic buildings, as well as wider net zero targets across the built environment.**

At the year's close, we welcomed the long-awaited EPC reform consultation as part of a wider review of the Energy Performance of Buildings (EPB) Regime. Elmhurst has submitted our views and we look forward to hearing the consultation results later this year.

The increased awareness of EPCs meant they were also never very far from media headlines. This presented an unmissable opportunity for Elmhurst to get our views heard about what the future EPC should include. In

2024, our comments were read by a record eight million people. Our profile has never been higher, with Elmhurst featuring across all types of media and even on TV, with an appearance on Channel 4's Dispatches.

With so many changes relating to energy efficiency due in 2025, we look forward to the coming months with anticipation. The Future Homes Standard is set to come into force, while a consultation on Minimum Energy Efficiency Standards (MEES) Regulations for the domestic and non-domestic private rented and social rented sectors is expected imminently. We are also assured that RdSAP 10 will be here by spring.

However, in 2025, Elmhurst will be pushing hardest to get EPC reform right.

EPC change has the power to bring about a seismic shift in our 'base' understanding about the energy efficiency of the nation's homes and buildings – and their impact on the environment. This will also lay the groundwork for

achieving national decarbonisation goals and regaining public trust in the system by delivering useful, understandable information. From this base, other measurement professionals can really drive improvement across vital assessment areas such as airtightness testing, ventilation, U-values, heat loss calculations, measured energy performance, retrofit assessment and coordination, and more.

As we look towards 2030, sustained high energy costs and levels of fuel poverty in the UK make improving building energy efficiency essential. This, coupled with recent extreme weather events at home and around the world, underscores why energy efficiency improvements and retrofit are mission critical in the fight against climate change.

Energy and retrofit professionals take centre stage in all of this and the expertise and advice you, our members, give will be crucial. We remain committed to supporting you with the knowledge and skills to meet this challenge.

## Key facts and figures

# 15,750

registered Elmhurst memberships in 2024, including competency schemes.

(source: Elmhurst)



# 3611

Elmhurst members taking a course to upskill in 2024



# 53%

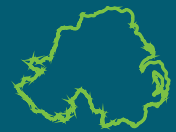
Emissions cut in the UK between 1990 and 2023, making us halfway to net zero.

(source: [Department for Energy Security and Net Zero](#))



# 24%

Percentage of households in fuel poverty in Northern Ireland.



# 8.9 MILLION

Estimated UK households in fuel poverty, based on those who are using more than 10% of annual income to heat their home to a satisfactory level.

(source: [House of Commons Library](#))



# 31%

Percentage of households in fuel poverty in Scotland.



# 1 in 4

Pounds spent on heating is wasted.

(source: [The Great Homes Upgrade](#))





38,000

DECs lodged in England and Wales in the year ending September 2024.

(source: [MHCLG](#))



1,571,000

The number of domestic EPCs lodged in the year up to September 2024.

(source: [MHCLG](#))



19%

Dwellings in Scotland built before 1919 (455,000).

(source: [Historic Scotland](#))



107,866

Total number of non-domestic EPC lodgements in England and Wales in the year ending September 2024 (actual figure is more likely to be 41,000).

(source: [MHCLG](#))



86%

Built environment professionals who want to see real-world data used in EPCs.

(source: [National Retrofit Hub and Futurebuild survey](#))



84

Median SAP score of new dwellings in England and Wales (EPC band B) 2019-2024.

(source: [Office for National Statistics](#))



40%

Local authorities where more than half of housing is band C or higher.

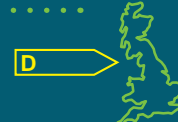
(source: [Office for National Statistics](#))



5%

Built environments professionals who think an energy cost metric should be used to set Net Zero Targets.

(source: [National Retrofit Hub and Futurebuild survey](#))



EPC D

The median EPC band for homes in England and Wales

(source: [Office for National Statistics](#))

## 2024 in policy and regulations



### January



- Scottish Government **publishes details** of the New Build Heat Standard (NBHS), requiring new homes and buildings to install climate-friendly heating systems from April 2024.
- The Department for Energy Security and Net Zero (DESNZ) **launches 12 projects** receiving a share of £16 million from the Green Homes Finance Accelerator to improve home energy efficiency.
- The Environmental Audit Committee releases its report, **Heat resilience and sustainable cooling**, calling for better preparedness for hotter temperatures and heat waves.
- The review **'Adapting historic homes for energy efficiency: a review of the barriers'** is released by government, exploring the barriers to improving energy efficiency of listed buildings and homes in conservation areas.

### February



- Sir Keir Starmer announces Labour will **no longer commit to spending £28 billion** a year on its green investment plan, in a major U-turn.
- DESNZ releases its annual **fuel poverty statistics** for 2024, estimating 13% of households in England are in fuel poverty.

## March



- The Chancellor of the Exchequer's **Spring Budget** allocates £120m for green industries to develop technologies via the Green Industries Growth Accelerator (GIGA).
- Northern Ireland government releases its Action Plan 2024, **The Path to Net Zero Energy**, outlining key actions being delivered as part of the Executive's Energy Strategy.
- The Scottish Government consults on its **Heat in Buildings Bill**, with proposals on the minimum energy efficiency standards for the domestic private rental sector and privately owned homes.
- The government **publishes** its response to the Energy Company Obligation schemes: Standard Assessment Procedure (SAP) and Reduced Data SAP (RdSAP) Amendments consultation.
- DESNZ **announces** more than 8,000 social homes will be upgraded at no cost to residents, using a £75 million allocation of the Social Housing Decarbonisation Fund.
- New **measures** to simplify the Scottish planning process for zero and low carbon technologies introduced to help homeowners and businesses save money and reduce their emissions.

## April



- Department for Levelling Up, Housing and Communities (DLUHC) **publishes** official statistics on EPC developments in England and Wales for Q1.
- Provisional data **shows** UK territorial greenhouse gas emissions continue to fall, as UK is now halfway to net zero as emissions have been cut by 53% between 1990 and 2023.
- Welsh Government releases guidance on **The Welsh Housing Quality Standard 2023**, which says homes must be affordable to heat with minimal environmental impact.

## May



- Northern Ireland publishes its '**Path to Net Zero Energy**' Action Plan for 2024.
- DESNZ **announces** £557 million for public buildings to switch to cleaner heating and save on energy bills.

## June



- The long-awaited amendment to the **Energy Performance of Buildings Regulations comes into force** on 24 June 2024. This allows for energy assessment and EPC data to be shared with the property owners, occupiers and landlords.
- In its **Manifesto**, the Liberal Democrats says it will take “bold, urgent action needed to tackle climate change”.
- The **Labour Manifesto** reinforces the Party’s commitment to achieving the net zero target and introduces a new mission to “Make Britain a Clean Energy Superpower by 2030”.
- The **Conservative Manifesto** reiterates a commitment to delivering net zero by 2050.

## July



- The Labour Party wins the **General Election** with a landslide 412 seats. Rt Hon Ed Miliband MP is announced Secretary of State for Energy Security and Net Zero, with Sarah Jones MP as Minister of State for DESNZ and Department for Business and Trade (DBT), and Angela Rayner as Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government.
- The British Standards Institute (BSI) **releases** a consultation on ‘BS 40104 Retrofit assessment for domestic dwellings – Code of practice’, otherwise known as the Retrofit Assessor Standard.
- Ed Miliband, new Energy Security and Net Zero Secretary, **reverses** the Conservative Government’s decision to scrap MEES EPC targets for the private rented sector, by announcing that landlords will need their properties to meet an EPC rating C by 2030.
- Scottish Government launches a consultation on the next revision to the **Building Standards** for a Scottish equivalent to Passivhaus.

## August



- No new policy or consultation released.



## September



- Under the Warm Homes Plan, DESNZ confirms **plans to consult** on raising the target for all rented homes to reach EPC C by 2030 under Minimum Energy Efficiency Standards (MEES) Regulation.
- The renamed Ministry of Housing, Communities and Local Government (MHCLG) **announces** it will consult on a new Decent Homes Standard for the rented sector, with EPCs set to be included as a measure.

## October



- In the Autumn Budget 2024, The Government **introduces plans** to boost energy efficiency upgrades in homes across England, with £1billion for the Public Sector Decarbonisation Scheme and £3.4billion under the Warm Homes Plan towards heat decarbonisation and household energy efficiency.

## November



- DESNZ permits Ofgem to allocate additional vouchers for the **Boiler Upgrade Scheme** by up to £30 million for air or ground source heat pump installation and biomass boilers.
- DESNZ **announces** new climate goals for the UK Government at COP29. A UK target to reduce emissions by 81% by 2035 was announced.
- A **consultation** on the Energy Company Obligation 4 (ECO4) and the Great British Insulation Scheme (GBIS) seeks views on scheme changes, including proposals for a voluntary Pay-For-Performance (PFP) mechanism which measures and rewards actual improvements in the energy efficiency of homes treated.

## December



- The long-awaited public consultation on EPC reform is **published** as part of a wider review of the Energy Performance of Buildings (EPB) regime. There will be changes to the EPC in England and Wales, with Scottish Government and Northern Ireland Assembly considering their own changes to EPCs.

## EPC Reform

At the time of writing, we have seen some major developments when it comes to reform to EPCs/energy certificates. The Scottish Government has now published its outcome to its 2023 EPC Reform consultation with changes due to come into force in late 2026.

In addition to this, a series of changes have also been proposed by government within its own public consultation titled: **Reforms to the Energy Performance of Buildings regime.**

The consultation looks to clarify and consolidate regulations, as well as improve the data use, quality and application of energy certificates across both domestic and non-domestic buildings in England and Wales.

It reviews the metrics that comprise the EPC, and explores solutions to improve data management, quality control and enforcement around non-compliance.

The review also addresses the application of regulations and EPCs across different types and classifications of buildings, such as houses in multiple occupation (HMO), short term rents and heritage.

Finally, it seeks to gather opinions on current Display Energy Certificates (DECs) and explore ways to improve Air Conditioning Inspection Reports (ACIRs).

### More on EPCs

Among the changes proposed to both the domestic and non-domestic EPC, the government is seeking views on a new design aimed at improving consumer understanding of the information it provides.

With the non-domestic EPC, the government aims to maintain the carbon based metric for the short term. However, for domestic EPCs it has proposed multiple metrics which could

be included to provide a more complete representation of housing energy performance, rather than the current single headline 'energy cost' metric.

With this the government is proposing that the Domestic EPC display four headline metrics: 'energy cost', 'fabric performance', 'heating system' and 'smart readiness'. 'Energy consumption/use' and 'carbon emissions' are listed as secondary metrics.

Elmhurst generally supports the aims of this consultation to widen the scope of energy certificates, reduce validity periods and demystify information for the end consumer. However, we do have some concerns about whether the chosen headline metrics will resolve any misunderstandings about the EPC for consumers. Instead, these should be the three Cs we have long-called for: 'energy cost', 'energy consumption/use' and 'carbon emissions'.



## Elmhurst's Big Asks

Each year Elmhurst outlines our key policy and regulatory priorities for the government. This year, these focus on a mix of priorities for the new EPC, as well as regulations, standards and policy areas relating to energy efficiency.



### EPC Reform

#### Cost, carbon and consumption – three EPC headline metrics

With the reform consultation under way, now is the time to get the foundations of the new EPC right.

It is well-known that Elmhurst supports changes to domestic and non-domestic EPCs. The proposals are a good first step, but our years of experience demonstrates that the three Cs – 'energy cost', 'energy consumption/use' and 'carbon emissions', should be the headline metrics.

'Smart readiness', 'fabric performance' and 'heating system', are good choices for secondary metrics as they are not as easily understood, but still deliver important, in-depth information.

The three Cs make the biggest difference to the energy performance of a building and are used by energy professionals and understood by policymakers and homeowners alike.

They will help resolve any consumer misunderstandings about the EPC and improve trust

in its accuracy. Policymakers can use these metrics when developing legislation, for example, by drawing upon the cost metric for fuel poverty and the carbon metric for climate change policy.

#### 3-year EPC validity

EPCs should be renewed every three years, with re-assessment and re-issue required whenever there is a change to a building that impacts its energy performance. In some cases, this may mean the EPC is renewed sooner.

Currently, EPCs are valid for 10 years, meaning that many are now very out of date. In some cases, this means any private and social rented properties leased for more than 10 years will be exempt from making energy efficiency improvements. This is because a new EPC will not have been required in that time.

A valid EPC should also be required throughout tenancy periods to provide accurate and up-to-date information about a building's energy performance, while also improving compliance.





**Redesign the EPC**

Elmhurst believes that much of the confusion around EPCs could also be avoided if they were redesigned with a simple, consumer-friendly graphic.

The current domestic EPC appearance is recognised by its colourful A to G rating scale, with A+ to G for non-domestic. Elmhurst would like to see the new EPC designed to reflect food labelling, using a red, amber and green rating system for the three

Cs. This is a recognisable, easily understood format for consumers, and could be supplemented by a summary page of the most important information relating to these.

**Reforms to non-domestic EPCs**

Non-Domestic EPCs use a carbon metric as the single headline measure, in line with the government’s net zero objectives. It is expected new primary or secondary metrics will be added over time.

Elmhurst would welcome the addition of an energy cost and energy consumption metric to the non-domestic EPC. This would require consideration of how the current Display Energy Certificate (DEC) detailing energy consumption could be blended. Changes to DEC are also being explored as part of the Energy Performance of Buildings consultation.

### Benchmark energy assessor training standards

Elmhurst, as a government-approved accreditation scheme, welcomes all new members irrespective of where they have trained. However, it is important that the same high standards of energy assessor training are reached, regardless of provider. This is vital in helping to ensure accurate energy assessments and EPCs.

Elmhurst will actively support government in working to identify common assessment errors to refine future training, guidance and standards, and to improve rigour of energy assessments where required.

The consultation is also exploring the potential to give accreditation schemes more control to oversee training or solely provide training.

## Wider energy efficiency considerations

### Update Minimum Energy Efficiency Standards (MEES) Regulations

At the time of writing, a government consultation on MEES Regulations is expected imminently. Elmhurst believes the following changes are important to deliver an effective MEES framework.

#### 1. Set EPC C for 2030 across domestic private rented sector (PRS) and social rented sector (SRS)

There are still 3.2 million private rented properties rated EPC D or lower in England and Wales. Tenants living in EPC

band D-G homes can face fuel bills which are almost three times higher than those living in EPC band C homes. Legal targets are a 'must' to give the impetus for upgrading to EPC C.

It is high time MEES Regulations are reformed to protect tenants across the private rented and social sectors who are often in fuel poverty, on low incomes and classed as some of the most vulnerable in society.

To account for a raft of delays with MEES, we believe private and social rented homes with new and renewed tenancies, should be required to reach EPC C by 1 April 2030. This should also be the case for existing tenancies.

Moreover, the government should also establish a roadmap for future changes to ensure that these types of properties continue to be improved going into the next decade.

#### 2. Target EPC B by 2030 across non-Domestic PRS

An EPC C requirement for all non-domestic tenancies should be confirmed for 1 April 2027 as initially expected in the Government's 2019 Minimum Energy Efficiency Standards (MEES) Regulations consultation. EPC B should apply to all privately rented non-domestic properties by 1 April 2030.

Rising energy costs in recent years and demand for more

energy efficient real estate means this issue is a higher priority in decision making across the non-domestic PRS. Regulation should set the benchmark, rather than lagging behind progress in the non-domestic sector.

#### 3. Close the MEES Exemptions loopholes

It is right the government is taking an in-depth review of MEES exemptions. These should protect landlords for whom the cost of improvements could be prohibitively high and potentially damaging for livelihoods. At the same time, they must prevent the easy escape route that has so far been afforded for others.

Although the government may now be exploring a cost cap of £15,000, Elmhurst believes increasing the cap to a minimum of £10,000 is the right thing to do to boost the number of lower cost, very effective energy efficiency improvements such as cavity wall, floor and loft insulation. There should also be a crackdown on landlords who fraudulently claim exemptions, with a closer focus on working with heritage building owners to comply with MEES in a pragmatic way.





### **Launch the Home Energy Model (HEM)**

HEM will be the 'New SAP' and become the calculation methodology used to measure compliance with the Future Homes Standard (FHS) and determine new EPC ratings.

HEM has been in the pipeline since it was consulted on in December 2023. This must go live this year, ready to coincide with the FHS Building Regulations update when it comes into force.

While HEM includes much of the functionality afforded by SAP, we are looking forward to the added

capabilities it promises, such as 30-minute updates on fuel prices and an open source code where amendments will be visible and transparent prior to changes to regulation.

### **Confirm RdSAP 10**

The long delay to the latest version of the Reduced Data Standard Assessment Procedure – RdSAP 10 – is well known. This is the biggest update to RdSAP since 2012 and Elmhurst believes it is imperative for delivering more detailed assessments of existing dwellings.

This update to the methodology will include new technologies

such as battery storage and PV diverters. This is an encouraging development that will deliver a better picture of existing homes' energy efficiency. Its increased scope for data collection also offers more clarity, with window measurements now included and the capability to include airtightness test results, among other developments. Changes in RdSAP 10 assessments will require assessors to spend more time on site. Although this additional detail should improve EPC accuracy, Elmhurst will be advocating that fees paid to professionals reflect this increase in time and value.



### Rebalance tax in favour of electricity

Currently, all green taxes get applied to electricity supply rather than gas. This means that any lower carbon heating system, such as a heat pump, is not recommended on the current EPC because they cost more to run than traditional fossil fuel systems such as the gas boiler.

Elmhurst has long called for government to take the bold, but necessary step of switching the 'green levy' to support the journey to net zero. Price ceilings and floors should be applied to ensure that what is right for the

environment is also right for the consumer. However, we recognise that people shouldn't be simply trapped into expensive fossil fuels, and a transition that is fair needs to take place, protecting the most vulnerable.

### Measure actual energy performance

Energy assessors use a variety of methods to determine the energy performance of a building. It is now widely accepted that energy assessments based on measurement and testing, such as U-values, airtightness and thermography, rather than assumptions, produce more

accurate results.

Measured energy performance should now become mandated to measure the energy performance of new homes and before and after any retrofit work.

The FHS has also proposed voluntary measured energy performance testing for housebuilders to demonstrate new homes' compliance. This is designed to tackle the performance gap recognised in Part L 2021.



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For further information about the services that  
Elmhurst Energy provides, please visit:

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