

LANDLORD INSIGHTS

EPC C and MEES: The Landlord's Upgrade Guide

England — What the energy efficiency rules mean for your property and what to do before 2028

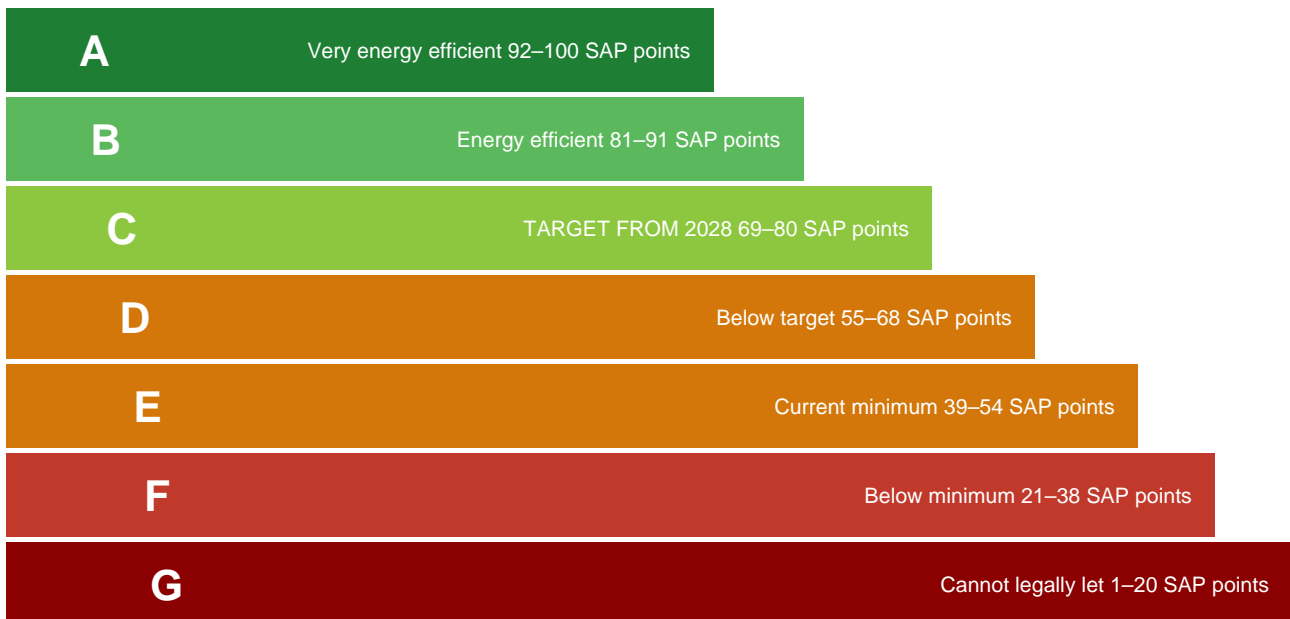
The government has confirmed that private rented properties in England will need to reach EPC C before new lets from 2028. With hundreds of thousands of rented properties currently rated D or below, the clock is running. This guide explains what the rules are now, what is coming, what improvements deliver the best return, and how to plan your upgrade programme without overspending.

1	What EPCs and MEES Are	2
2	The Current Rules — EPC E Minimum	3
3	The EPC C Target: What's Coming and When	4
4	Improvements That Raise Your EPC Rating	5
5	Exemptions: When You Don't Have to Comply	6
6	Your Action Plan and Key Dates	7

1 What EPCs and MEES Are

Energy Performance Certificates (EPCs)

An EPC rates a property's energy efficiency on a scale from A (most efficient) to G (least efficient). The rating is based on the construction, heating system, insulation, and glazing of the property — not the tenant's actual energy use. EPCs are produced by accredited domestic energy assessors and are valid for 10 years.



Minimum Energy Efficiency Standards (MEES)

MEES are the legal minimum energy efficiency standards that a private rented property must meet to be lawfully let. They are set by the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015. Currently the minimum is EPC E. From 2028, the government intends to raise this to EPC C for new lets.

Why This Matters Now

An EPC D or E property can be let today — but upgrading takes time and money. Grants and installer availability are limited. Landlords who start planning now will secure better prices, access more funding, and avoid a last-minute scramble that could force void periods in 2028.

2 The Current Rules — EPC E Minimum

What the law requires today

Since 1 April 2020, it has been unlawful to let a residential property in England or Wales with an EPC rating of F or G. This applies to all private rented tenancies — not just new lets. A landlord with an F- or G-rated property is in breach of MEES right now, regardless of when the tenancy began.

Enforcement

Local authorities are responsible for enforcing MEES. Enforcement powers include:

- A compliance notice requiring the landlord to provide information about the property's energy performance.
- A penalty notice of up to £5,000 for letting a sub-standard property for less than 3 months.
- A penalty notice of up to £10,000 for letting a sub-standard property for 3 months or more.
- Publication of the breach on the PRS Exemptions Register.

F and G Rated Properties: Act Now

If you have a property rated F or G, you are in breach of current law. You must either carry out improvements to reach EPC E or register a valid exemption. Letting an F or G rated property without a registered exemption exposes you to a penalty of up to £10,000.

The cost cap

Under current MEES rules, landlords are only required to spend up to £3,500 (including VAT) to bring a property to EPC E. If the minimum standard cannot be reached within this cost cap, a cost cap exemption can be registered. The government is expected to raise the cost cap significantly when the EPC C regulations are introduced.

EPC E — what it looks like in practice

For most pre-1980s properties, reaching EPC E typically requires cavity wall insulation or loft insulation if not already installed, and potentially a boiler upgrade if the existing system is very old. Many D-rated properties are already at or close to E without requiring major work.

Check Your EPC Rating

EPCs are on the public register at epcregister.com. Enter the property address to find the current rating, the date of the assessment, and the recommended improvements. If the EPC is over 10 years old, commission a new one before planning any upgrade work — the rating may have changed and improvements may already be captured.

3 The EPC C Target: What's Coming and When

The government's policy

The government has confirmed that private rented homes in England will be required to meet EPC C. The current timetable requires all new lets to meet EPC C from 2028. Existing tenancies are expected to follow, with a proposed backstop date of 2030. Legislation has not yet been passed — the exact dates and cost cap are subject to the final regulations.

What EPC C means for a typical property

EPC C (69–80 SAP points) is a meaningful step up from the current EPC E minimum. For most older properties, reaching C will require a combination of improvements — typically insulation, glazing, and a modern heating system. The table below shows the most common routes to EPC C for different property types.

Property Type	Typical Current Rating	Common Route to EPC C
Pre-1940 terraced house	D–F	Solid wall insulation + heat pump or new boiler + double glazing
1960s–80s semi-detached	D–E	Cavity wall insulation + loft insulation + boiler upgrade
1990s–2000s detached	C–D	Often already C or close — loft top-up, controls upgrade
Victorian flat (upper floor)	D–F	Solid wall insulation or internal wall insulation + double glazing
Purpose-built flat (post-1990)	C–D	Usually close to C — heating controls and LED lighting may suffice

The cost cap under the new regulations

The government has proposed raising the cost cap to £15,000 per property when the EPC C regulations take effect. This means landlords could be required to spend up to £15,000 on improvements before a cost cap exemption can be claimed. This is a significant increase from the current £3,500 cap and will affect financial planning for portfolio landlords.

Regulations Not Yet Passed

The EPC C requirement has been announced but the enabling legislation has not yet been passed. Commencement dates, the cost cap figure, and exemption criteria are all subject to change. Monitor landlordinsights.co.uk — we will publish an alert as soon as the regulations are laid before Parliament.

4 Improvements That Raise Your EPC Rating

The improvements below have the greatest impact on EPC rating for most residential properties. Costs and savings are indicative — always obtain quotes from accredited installers and check current grant availability before committing.

Loft insulation (top-up to 270mm)	£300 – £600
Typical annual saving: £150 – £250/year	<i>Complexity: Low</i>
Cavity wall insulation	£500 – £1,500
Typical annual saving: £200 – £400/year	<i>Complexity: Low</i>
Double or triple glazing (full replacement)	£4,000 – £10,000
Typical annual saving: £100 – £200/year	<i>Complexity: Medium</i>
Solid wall insulation (external)	£8,000 – £22,000
Typical annual saving: £400 – £700/year	<i>Complexity: High</i>
Solid wall insulation (internal)	£4,000 – £12,000
Typical annual saving: £300 – £600/year	<i>Complexity: Medium–High</i>
Gas boiler replacement (A-rated)	£2,000 – £4,000
Typical annual saving: £150 – £300/year	<i>Complexity: Low–Medium</i>
Air source heat pump	£8,000 – £15,000 (after grant)
Typical annual saving: £200 – £500/year*	<i>Complexity: High</i>
Solar PV panels (4kW system)	£5,000 – £7,000
Typical annual saving: £300 – £600/year	<i>Complexity: Medium</i>
Smart heating controls / thermostatic radiator valves	£200 – £600
Typical annual saving: £75 – £150/year	<i>Complexity: Low</i>
LED lighting throughout	£100 – £300

Typical annual saving: £50 – £100/year

Complexity: Low

** Heat pump savings depend heavily on property insulation levels and previous heating system.*

Available grants

- Great British Insulation Scheme — free or subsidised insulation for lower EPC-rated properties.
- Boiler Upgrade Scheme — £7,500 grant towards an air source heat pump, £7,500 towards a ground source heat pump.
- ECO4 Scheme — funded improvements for properties occupied by low-income or vulnerable households.
- Local authority retrofit schemes — check with your council for area-specific programmes.

Use an Accredited Assessor First

Before commissioning any improvement work, get a new EPC assessment and ask the assessor which specific improvements will push the property to C within your budget. Not all improvements have equal impact — the assessor can model the effect of each measure before you spend anything.

5 Exemptions: When You Don't Have to Comply

Exemptions must be registered

An exemption does not apply automatically. You must register it on the PRS Exemptions Register at gov.uk before you let or continue to let the property below the minimum standard. An unregistered exemption offers no protection against a penalty notice.

Cost cap exemption

If you have obtained three quotes from accredited installers and the cost of all recommended improvements exceeds the cost cap (currently £3,500, expected to rise to £15,000 under future regulations), you may register a cost cap exemption. The exemption lasts 5 years, after which you must reassess whether improvements can be made within the new cap.

Third party consent exemption

If improvements require the consent of a third party — a freeholder, a superior landlord, a planning authority, or a mortgagee — and that consent has been refused or is subject to conditions you cannot reasonably meet, you may register this exemption. You must provide evidence of the refusal. The exemption lasts 5 years.

Devaluation exemption

If a qualified surveyor provides a written opinion that carrying out the recommended improvements would reduce the market value of the property by more than 5%, a devaluation exemption can be registered. The exemption lasts 5 years.

New landlord exemption

A landlord who has recently acquired a property — through purchase, inheritance, or court order — and is letting it to a tenant who is already in occupation may register a temporary 6-month exemption while they arrange the necessary improvements.

Listed buildings and traditional construction

Properties that are listed or in a conservation area may be exempt from certain improvements where the works would unacceptably alter the character of the building. This is not an automatic exemption — it requires evidence that the relevant planning or listed building consent has been refused.

Exemptions Do Not Last Forever

Every exemption has a fixed duration (5 years for most, 6 months for the new landlord exemption). When an exemption expires you must reassess the property. If the property still cannot meet the minimum standard within the cost cap, you must register a new exemption with fresh evidence. Diarise expiry dates when you register — an expired exemption offers no protection.

6 Key Dates and Action Plan

Key dates

Now	EPC E minimum in force — F and G rated properties cannot legally be let
2026–27	Commission EPC assessments for all D and E rated properties. Obtain improvement quotes and check grant availability.
2028 (proposed)	EPC C required for all new lets in England — legislation pending, commencement date TBC
2030 (proposed)	EPC C required for all existing tenancies in England — legislation pending
2028–30	Wales, Scotland and Northern Ireland have separate timetables — monitor landlordinsights.co.uk

Why Act Now, Not in 2027

Installer capacity for heat pumps and solid wall insulation is already constrained. Grant funding is limited and operates on a first-come, first-served basis. Landlords who commission assessments and obtain quotes in 2026 will secure better prices, access more grant funding, and avoid void periods caused by last-minute works in 2028.

The cost of doing nothing

F and G rated properties: let today without a registered exemption exposes you to penalties of up to £10,000 and publication on the PRS Exemptions Register.

D and E rated properties: from 2028, inability to meet EPC C means you cannot re-let to a new tenant — the property becomes unlettable and income stops until works are completed.

Cost cap: the proposed £15,000 cap means landlords may be required to spend significantly more than under current MEES rules before an exemption can be claimed.

Installer inflation: demand for energy efficiency work will peak as the 2028 deadline approaches. Early movers will pay less.

Action Checklist

- Check the EPC rating of every property in your portfolio**

Search epcregister.com. Note the current rating, assessment date (renew if over 10 years old), and the recommended improvements listed.
- Prioritise F and G rated properties — these are in breach of current law**

Arrange improvement works or register a valid exemption on the PRS Exemptions Register immediately.

Penalty up to £10,000 for non-compliance
- Commission EPC assessments for D and E properties — get three improvement quotes**

Ask the assessor to model improvements needed to reach C and the estimated cost of each measure. Obtain three accredited installer quotes — required for a cost cap exemption.
- Check grant eligibility for each property**

Boiler Upgrade Scheme (£7,500 towards heat pump), Great British Insulation Scheme, ECO4. Check gov.uk/improve-energy-efficiency before committing to works.
- Diarise improvement works — allow 12–18 months lead time**

Installer capacity for solid wall insulation and heat pumps is limited. Do not leave this until 2027.
- Diarise exemption expiry dates**

Exemptions last 5 years (6 months for new landlord exemption). An expired exemption offers no protection. Log renewal dates when registering.
- Monitor legislation for final EPC C commencement date and cost cap**

Regulations not yet passed. Subscribe to landlordinsights.co.uk for an alert when the bill is laid before Parliament.

Stay Ahead of Every Change

Landlord Insights monitors 140 local authorities across England, Wales, Scotland and Northern Ireland for regulatory changes, enforcement actions and legislative updates — delivering a weekly briefing every Monday morning so you never miss a deadline.

Plans from £9.99/month | landlordinsights.co.uk

Disclaimer: This guide is for general information only and does not constitute legal advice. Always verify current requirements at legislation.gov.uk and seek professional advice for your specific circumstances. Grant schemes and regulations change — check gov.uk for current availability.