

Historic England's response to the DESNZ consultation: Improving the energy performance of privately rented homes in England and Wales

Question 1 – Do you agree with government's preferred position of using new alternative Energy Performance Certificate (EPC) metrics following EPC reform as the basis for higher Minimum Energy Efficiency Standards (MEES) for privately rented homes? [1,500 c]

Historic England agrees with this position, with the following considerations.

Taking a whole building approach is essential. This will help to deliver measures that improve thermal performance and produce cost and carbon savings, while avoiding the risks of increased moisture, overheating, and fabric deterioration (Historic England, 2024). Historic England supports the development of improved regulations and standards to ensure that appropriate energy efficiency improvements are made.

MEES should align with Approved Document L, allowing an acceptance threshold which means that works should comply with MEES to the extent that is reasonably practicable and would not unacceptably alter the dwelling's character or appearance. The energy efficiency of traditional buildings (i.e., pre-1919) should be improved only if deterioration is avoided (Approved Document L, p.3 par.0.10/V.2 p.4, par.0.14 – MHCLG, 2023).

References

Historic England (2024). *Whole Building Approach for Historic Buildings*.
<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/whole-building-approach-for-historic-buildings/>.

Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2023). *Conservation of fuel and power: Approved Document L*.
<https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>.

Question 2 – Government would welcome views on options for setting future MEES against a combination of new 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?

Historic England disagrees with fabric performance being the primary standard, and questions whether focusing on fabric performance is the best way to support the private rented sector (PRS) in making informed decisions on the most effective and worthwhile energy efficiency measures. Moreover, while the outcome of the recent EPC consultation is pending, the methodology for the calculation of the metrics is unknown and so too is the potential impact on traditional buildings (i.e., pre-1919).

The flaws of a ‘fabric first’ approach are clearly seen when focusing on traditional buildings – for such structures, this is often not a technically sound approach and may cause problems. In general, traditional and modern buildings differ in how they manage moisture, air, and heat (Historic England, 2024a). Therefore, upgrading fabric through the installation of insulation without considering moisture or ventilation can lead to consequences such as mould growth and damp. Such risks are relevant to all buildings when insulation is inappropriately installed, as seen in the recent ‘insulation scandal’ caused by the ECO4/GBIS insulation schemes (BBC, 2025) and in retrofit schemes in Preston and Wales (Historic England, 2024b).

The properties and needs of traditional buildings must be given careful consideration in the development of MEES because such buildings form a significant proportion of the PRS. According to the English Housing Survey, of all privately rented dwellings, 31.1% were built pre-1919. This equates to about 1,517,000 traditional buildings out of the 4,880,000 dwellings in the PRS. The pre-1919 age group was the largest of all building age groups, meaning pre-1919 buildings are more likely to be privately rented than their modern counterparts (MHCLG, 2024). Therefore, any approach to MEES that fails to consider the nature of traditional buildings risks creating problems in a significant proportion of the PRS.

In summary, wherever a fabric performance metric is utilised, taking a whole building approach (as described in our answer to Q1) is essential.

References

BBC News (2025). 'Mould, damp and decay': Homes excluded from insulation scandal help'.
<https://www.bbc.co.uk/news/articles/c203rnepzexo>.

Historic England (2024a). *Traditional Buildings and Energy Efficiency*.
<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/traditional-buildings-and-energy-efficiency/>.

Historic England (2024b). *When Retrofit Goes Wrong*.
<https://historicengland.org.uk/research/heritage-counts/heritage-and-environment/introduction-to-retrofitting/when-retrofit-goes-wrong/>.

Ministry of Housing, Communities and Local Government (2024). *English Housing Survey 2023 to 2024: headline findings on demographics and household resilience*.
<https://www.gov.uk/government/collections/english-housing-survey-2023-to-2024-headline-findings-on-demographics-and-household-resilience>.

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

Alternative 1: A requirement to meet a standard set against dual metrics of equal weighting. The standard would be set against dual metrics including two of the following: fabric performance, heating system and smart readiness.

Alternative 2: A requirement to meet an overarching standard set against all three metrics of fabric performance, heating system, and smart readiness, either through improvements across all standards or through landlords concentrating improvements against one or two standards.

Historic England does not agree with Alternative 1 at this time.

It has been proven that heat pumps are viable for use in traditional buildings (i.e., pre-1919) (Historic England, 2023). While heating systems can significantly reduce a building's energy consumption and operational carbon emissions, a heating system metric must also be well-considered and reflective of the overall environmental performance, including the embodied carbon of the system.

When considering the combination of the fabric performance and heating system metrics, it is also important to be aware that fabric improvements will contribute towards the efficiency of a heat pump, thus reducing running costs and operational carbon emissions, capital costs, the need for electricity supply infrastructure, and the required sizes of plants and emitters. However, as discussed in our response to Question 2, prioritising thermal upgrades to fabric in traditional buildings can cause problems.

Therefore, maximising low-carbon heating system efficiency must not be carried out to the exclusion of all other considerations. The technical, functional, and financial feasibility of thermal upgrades must be considered and balanced alongside their potential to unacceptably alter the dwelling's character or appearance (Approved Document L, V.1, p.3, par. 0.09/ V.2, p.4, par. 0.13 – MHCLG, 2023) and the technical risk related to preventing long-term deterioration of the building's fabric (Approved Document L, p.3 par.0.10/V.2 p.4, par.0.14 – MHCLG, 2023).

Additionally, as noted in Historic England's response to the recent EPC consultation, there are challenges associated with facilitating smart readiness for rural communities, off-grid properties, and those with poor internet connectivity (Historic England, 2025). Such barriers must be considered when assessing the feasibility of a smart readiness metric.

Therefore, Historic England agrees with Alternative 2. At this time, while the outcomes of the EPC consultation are pending, this provides the most flexibility for any landlord to achieve MEES compliance in the most feasible and technically sound way.

References

Historic England (2023). *Heat Pumps in Historic Buildings: Air Source Heat Pump Case Studies – Small-scale Buildings*. <https://historicengland.org.uk/images-books/publications/air-source-heat-pumps-historic-buildings/heag316-heat-pumps-historic-buildings/>.

Historic England (2025). *HE response to Energy Performance of Buildings Regime consultation – February 2025*. <https://historicengland.org.uk/content/docs/consultations/response-reforms-energy-performance-buildings-regime-feb25/>.

Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2023). *Conservation of fuel and power: Approved Document L*.
<https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>.

Question 9 – Do you agree properties that have an EPC rating of C against the EER on EPCs before 2026 should be recognised as compliant with the future standard until their EPC expires or is replaced?

Historic England agrees that properties with a current EPC rating of C should be deemed compliant until their existing EPC expires. This proposal may allow much needed time for the sector to undertake the necessary training and build capacity, and to ensure that the most appropriate and cost- and carbon-efficient solutions are implemented in traditional buildings (i.e., pre-1919). This will also allow recommendations to be updated and improved to be more reflective of the new u-values and metrics being integrated into the Home Energy Model (HEM) methodology.

Question 10 – Do you agree with government’s proposal to require landlords to commission a new EPC before taking action to comply with higher MEES?

10.1. Should the cost of this new EPC be included within the cost cap?

10.2. Should landlords still be required to commission post-improvement EPCs? If yes, should the cost of the post-improvement EPC also be included within the cost cap?

Historic England agrees that the cost of any new pre-or post- implementation EPC should be included in the cost cap.

However, Historic England has concerns over current sector capacity to deliver the volume of EPCs required for this proposal while maintaining robust quality assurance. There are both quality and implementation risks associated with the large number of additional properties anticipated to need EPCs, as well as those properties where there have been significant changes to the building fabric or services since their construction.

Historic England recommends that a staged approach is provided to give the sector time to undertake the necessary training and build capacity, and to ensure that the most appropriate and cost- and carbon-efficient solutions are implemented in traditional buildings (i.e., pre-1919). This will also allow recommendations to be updated and improved to be more reflective of the new u-values and metrics being integrated into the Home Energy Model (HEM) methodology.

**Question 12 – Should government apply the PRS MEES Regulations to short-term lets?
Please explain your answer.**

Historic England has concerns over sector capacity to deliver MEES for such properties, especially considering the large number of additional properties in the private rented sector that will require EPCs and energy efficiency measures. If PRS MEES is also applied to short-term lets, Historic England recommends that a staged approach is adopted to give the sector time to respond, to build competent capacity, and to ensure that robust and accurate EPCs and recommendations can be implemented for historic properties to be let. This will mitigate risks associated with unintended consequences on building fabric and occupant health. The associated risks of stranded assets and the practicality of installations must also be considered.

We reiterate that, while the outcome of the recent EPC consultation is pending, appropriateness of output recommendations is currently unknown for buildings of traditional construction (i.e., pre-1919).

Proposed fabric performance metrics and recommendations must be embedded in a whole building approach. This will help to deliver effective retrofit measures that improve thermal performance and produce cost and carbon savings, while avoiding the risks of increased moisture, overheating, and fabric deterioration (Historic England, 2024). Maintenance needs, comfort, ventilation and air quality, and climate change risk must all be considered.

References

Historic England (2024). *Whole Building Approach for Historic Buildings*.
<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/whole-building-approach-for-historic-buildings/>.

Question 14 – Do you think the current MEES exemptions available to landlords are suitable?

14.1. Are there other circumstances, not covered by the current MEES exemptions regime, where you think government should consider making exemptions for?

The current wall insulation exception refers to providing written expert advice to demonstrate need. Historic England recommends that clear guidance on what this advice should include is provided, and that it follows a whole building approach. Historic England also recommends that fabric improvement exemptions should recognise and align with the wording in Approved Document L, allowing an acceptance threshold which means that works should comply with the standards to the extent that is reasonably practicable and would not unacceptably alter the dwelling's character or appearance. The energy efficiency of traditional buildings (i.e., pre-1919) should be improved only if deterioration is avoided. This particularly applies to traditional buildings with a vapour permeable construction that both absorbs moisture and readily allows moisture to evaporate. Examples include those built with wattle and daub, cob or stone, and constructions using lime render or mortar (Approved Document L, p.3 par.0.10/V.2 p.4, par.0.14 – MHCLG, 2023).

Historic England has concerns that the current MEES exemptions may not be sufficient to protect historic properties from the risks created by inappropriate retrofit interventions. Although the third-party consent exception allows for situations when planning permissions cannot be obtained (for instance, when Listed Building Consent would not be granted for the proposed energy efficiency measures), and the property devaluation exemption may in some instances evidence that certain energy efficiency measures would negatively affect a traditional property's value, we suggest that a broader, more holistic heritage exemption similar to the one within the Energy Performance of Buildings Regime would offer greater protection to traditional buildings, their landlords, and their occupants.

References

Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2023). *Conservation of fuel and power: Approved Document L*.
<https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>.