Historic England's response to the MHCLG and DESNZ consultation: Improving the Energy Efficiency of Socially Rented Homes in England

Question 7 – Do you agree that the government's preferred option (option 1-dual metric approach) to set a minimum energy efficiency standard for the SRS is the most suitable option? Yes/No/Don't know – Please explain your answer.

No

Historic England does not agree with the government's preferred option of the dual metric approach as the minimum energy efficiency standard for the social rented sector (SRS).

Firstly, while the outcome of the consultation on Reforms to the Energy Performance of Buildings Regime is pending, the exact methodology proposed for the calculation of the new metrics is unknown and their suitability for use in MEES (Minimum Energy Efficiency Standards) is difficult to assess. Without a certain and appraisable methodology, it remains unclear how holistic these metrics will be, and the potential impact and unintended consequences that these metrics would have on buildings of traditional construction (i.e., pre-1919) are also difficult to assess. 21% of all domestic buildings in England were constructed pre-1919, meaning that traditional buildings account for a major proportion of the housing stock and must be considered in the design of new Energy Performance methodologies (VOA, 2023) (Whitman et al, 2016). Whichever methodology is chosen, it must be robust and holistic – for example, by including as much in-situ measurement as possible alongside calculations and consideration of solar gains and future overheating risk. A robust methodology should be created with wide stakeholder engagement, and Historic England is committed to supporting the development of this approach.

Secondly, Historic England is unsure about the suitability of the proposed dual metric approach, using a Fabric Performance metric and either a secondary Smart Readiness or Heating System metric.

The Fabric Performance metric may not be the most effective way to support the Social Rented Sector (SRS) in making informed decisions on the most worthwhile and feasible energy efficiency measures, while ensuring occupant health and climate resilience is

maintained across the heterogenous English building stock. The flaws of a 'fabric performance-led' approach are clearly seen when focusing on traditional buildings. For such structures, 'fabric first' is often not a practical or technically sound approach and may result in problems. The properties of traditional buildings are explained in detail in Historic England's technical guidance, but in general, traditional and modern buildings differ fundamentally in how they manage moisture, air, and heat (Historic England, 2024a). Therefore, upgrading fabric through the addition of insulation without considering moisture compatibility or ventilation can lead to unintended consequences such as mould growth and damp. Such risks are relevant to both traditional and modern construction when insulation is not appropriately considered or installed, as seen in the widely publicised 'insulation scandal' that was caused by the recent ECO4/GBIS insulation schemes (BBC, 2025) and in retrofit schemes in Preston and Wales (Historic England, 2024b).

Moreover, it has been evidenced that fabric improvements do not always deliver a reliable payback, due to high upfront capital and carbon costs, diminishing returns, and variable occupant behaviour. Considering both operational energy use and whole life carbon is essential to determining the most effective long-term decarbonisation strategies, to balance building-level considerations with grid decarbonisation (DESNZ, 2024) (UKGBC, 2024). In addition, there is concern over fabric performance and Energy Performance Certificates (EPCs) not yet considering the impact of the changing climate. MEES and EPCs are largely focused on fuel poverty in winter months and do not consider that summertime overheating, which is an ever-increasing risk to occupant health, may lead to an increased need for cooling and energy use, and may result in fuel poverty in the summer (Fatemeh et al., 2025) (The Guardian, 2025). As the climate warms, it is essential to consider how efforts to increase the thermal comfort of modern and traditional homes alike do not lead to the unintended consequences of greater overheating risks.

Therefore, Historic England advises that a proposed Fabric Performance metric must be embedded in a whole building approach, as a preferable alternative to a fabric first-led 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, 2024c). Maintenance needs, comfort, ventilation for air quality, and climate change risk must all be considered, and where a Fabric Performance metric is utilised, incorporating the most accurate calculation of fabric performance is critical. Historic England believes that the whole building approach should also underpin the government responses following the other recent retrofit-related consultations.

Regarding the dual metric approach's possible secondary Smart Readiness metric, as noted in Historic England's response to the consultation on Reforms to the Energy Performance of Buildings Regime, 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.

We also have concerns about the methodology underpinning the dual metric approach's possible secondary Heating System metric. It has been proven that heat pumps are suitable for use in traditional buildings, as demonstrated by a recent Historic England study (Historic England, 2023). However, 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 (such as the system's embodied carbon).

Additionally, when considering the combination of the Fabric Performance and Heating System metrics, it is important to be aware that fabric improvements will contribute towards the efficiency of a heat pump by reducing running costs, operational carbon emissions, capital costs, the need for electricity supply infrastructure, and the required sizes of plants and emitters. However, as discussed above, prioritising thermal upgrades to fabric in traditional buildings is often not a practical or technically sound approach. Therefore, maximising low-carbon heating system efficiency by adding thermal insulation 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, with due regard for the above 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 of technical risk related to preventing long-term deterioration of the building's fabric or fittings (Approved Document L, p.3 par.0.10/V.2 p.4, par.0.14 – MHCLG, 2023). Careful consideration via the whole building approach is the best way to determine the most suitable retrofit interventions and avoid the risk of any unintended consequences.

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Question 8 – If you do not agree, which, if any, of the other metric options outlined would be your preferred approach to set a minimum energy efficiency standard for the SRS?

- **Option 2: A fabric performance metric only, by 2030.**
- **Option 3: Specified dual metrics, by 2030, either:**
- **Fabric Performance and Smart Readiness**
- **Fabric Performance and Heating System**
- **Smart Readiness and Heating System.**
- **Option 4A: An average of all three metrics (Fabric Performance, Smart Readiness and Heating System), by 2030.**
- **Option 4B: Two of the three metrics, at the landlord's discretion, (Fabric Performance, Smart Readiness, Heating System), by 2030.**
- **Don't know**

Please explain your answer.

Don't know

As described above, it is difficult to assess the suitability of these metric options while the proposed methodologies are still unknown, and so their potential impact on traditionally constructed buildings (i.e., pre-1919) cannot be determined.

Due to this uncertainty and the potential concerns outlined in our answer to Question 1, Historic England prefers the alternative proposal set out in the recent consultation on Improving the energy performance of privately rented homes in England and Wales: "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" (DESNZ, 2025).

While the outcomes of the consultation on Reforms to the Energy Performance of Buildings Regime is pending, this alternative proposal provides the most flexibility for any landlord to meet the new Minimum Energy Efficiency Standards (MEES) in the most holistic, feasible, and technically sound way.

References

Department for Energy Security and Net Zero (2025). *Improving the energy performance of privately rented homes: 2025 update*. https://www.gov.uk/government/consultations/improving-the-energy-performance-of-privately-rented-homes-2025-update.

Question 9 – Are there any other approaches to setting MEES that should be considered (such as an energy cost-based approach)? Yes/No/Don't know – Please explain your answer.

Yes

Any metrics proposed as part of new Minimum Energy Efficiency Standards (MEES) 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 and mould growth, overheating, and fabric deterioration (Historic England, 2024). Maintenance needs, comfort, ventilation for air quality, and climate change risks must all be considered. Improving the energy/carbon efficiency and climate resilience of buildings of traditional construction (i.e., pre-1919) or designated buildings (i.e., listed), while protecting their unique qualities, are compatible goals and Historic England

supports the development of improved regulations and standards for traditional buildings to ensure that both these buildings and modern ones are retrofitted appropriately.

Additionally, the proposed MEES should recognise and align with the wording in Approved Document L, which allows an acceptance threshold where appropriate works can be reasonably and practicably undertaken. This would mean that any retrofitting interventions should comply with the MEES to the extent that is reasonably practicable only where this would not unacceptably alter the dwelling's character or appearance or cause long-term deterioration to the building's fabric or fittings. This particularly applies to traditionally constructed buildings with 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).

Finally, as discussed in Historic England's response to the consultation on Reforms to the Energy Performance of Buildings Regime, we recommend that EPCs are reformed before exemptions for 'heritage buildings' are removed because EPCs in their current form might recommend measures that are inappropriate for traditional buildings (Historic England, 2025). Such measures risk causing detrimental impacts on significance and historic fabric and may negatively impact occupant health and building performance. The pressure to undertake inappropriate 'recommended measures' suggested in an EPC certificate would be intensified by the drive to achieve compliance with new MEES. However, it is also essential to prevent heritage buildings becoming 'stranded assets' if they do not meet the existing or any future minimum energy efficiency standard. Consequently, Historic England strongly believes that EPC exemptions should remain in place until the tools for assessment (currently EPCs underpinned by the Standard Assessment Procedure (SAP) methodology), issues with quality control over works, and the lack of suitable standards, capacity, and competence in the retrofit industry are satisfactorily addressed with respect to traditional buildings.

References

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Question 10 – If you are answering as a registered provider of social housing, after taking into account your future business plans and the provided assumptions for the requirements for the government's preferred option (option 1), which secondary metric would you be most likely to choose for the majority of your housing stock? Please explain your answer

- **Smart Readiness**
- **Heating System**
- **Don't know**
- **Not Applicable**

Not applicable

Question 11 – Do you agree with the proposal for social homes to comply with MEES by 1 April 2030? Yes/No/Don't know

Don't know

Question 13 – Do you agree with the government proposal to set a time limited spend exemption? Yes/No/Don't know – Please explain your answer

Don't know

Not applicable

Question 14 – Government has considered three options for setting the maximum required investment under a spend exemption. Comparing these options, which do you think is most appropriate for the SRS?

- **Set it at £10,000 (Government preferred approach)**
- **Set it at £15,000**
- **No spend exemption**
- **Other – please specify below**
- **Don't know**

Please explain your answer

Don't know

Not applicable

Question 15 – Do you agree with government's proposal for any time limited spend exemption to be valid for 10 years from 1 April 2030? Yes/No/Don't know – Please explain your answer

Don't know

Not applicable

Question 16 – If you have answered no to the above question, would you prefer an exemption that is valid for:

- **Less than 10 years**
- **More than 10 years**
- **Don't know**

Please explain your answer

Don't know

Not applicable

Question 18 – Are you aware of any other circumstances where individual dwellings could not meet the standard, but which are not covered by either applying the DHS exemptions

to MEES or the time-limited spend exemption? Yes/No/Don't know – Please explain your answer.

Yes

Historic England would like to draw attention to an exemption in the Decent Homes Standard consultation that is relevant to traditionally constructed buildings (i.e., pre-1919) (MHCLG, 2025). The exemption proposal, 'Physical or planning factors preventing compliance', mentions that "heritage buildings may be subject to listing constraints that restrict the extent of possible works." Similar to how heritage buildings (i.e., designated, or 'listed') might be exempt from DHS improvements due to their particular nature, Historic England believes that a broader exemption should be considered as part of the Minimum Energy Efficiency Standards (MEES) for listed traditional buildings. It is important that changes arising from recommendations to achieve compliance with MEES do not produce an excessive impact on a building's 'significance', defined in the National Planning Policy Framework as "the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting" (MHCLG, 2024). Therefore, here again the whole building approach proves useful as an effective way of working out which interventions will be sympathetic to the significance of designated buildings. Historic England's recent Advice Note 18 provides further guidance on finding the balance between effective retrofit interventions and conserving significance (Historic England, 2024).

References

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Question 19 – Do you agree that properties that meet an EPC (EER) rating of C prior to the introduction of new EPCs should be recognised as compliant with the future standard until their current EPC expires or is replaced? Yes/No/Don't know – Please explain your answer.

Yes

Historic England agrees that properties with a current Energy Performance Certificate (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-effective solutions are implemented in traditionally constructed 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 20 – Do you agree with government's proposal that, as an EPC reform transition measure, properties that have achieved EER C from the introduction of new EPCs until 1 April 2028 should be considered compliant until the property's EPC expires, after which they would need to comply with MEES? Yes/No/Don't know – Please explain your answer.

Yes

Historic England agrees that properties with a new Energy Performance Certificate (EPC) rating of C should be deemed compliant until that EPC expires. As above, 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-effective solutions are implemented in traditionally constructed 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 21 – If government's proposed approach is implemented, which of the following courses of action do you think registered providers of social housing would take where homes currently meet EER C? (Subject to the new EPC system being introduced in 2026)

- **Renew EPCs before the introduction of the new EPC system and comply ten years later**
- **Renew EPCs when they expire and demonstrate compliance under EER C until required to meet MEES using new EPC metrics in the early 2030s**
- **Renew EPCs when they expire and demonstrate compliance with MEES immediately following this**
- **Other**
- **Don't know**

Please explain your answer

Don't know

Not applicable

Question 23 – If you are a registered provider of social housing or industry body, do you foresee issues arising from installing energy efficiency measures in properties where the leasehold is owned by the registered provider but not the freehold? Yes/No/Not applicable – If you have selected 'yes', please explain your answer

Not applicable

Question 28 – Do you have any additional questions or concerns not answered in this consultation that we should consider when drafting the guidance and government response? Yes/No/Don't know – Please explain your answer.

Yes

Historic England's response to the Reforms to the Energy Performance of Buildings Regime consultation included the comment that the introduction of more accurate data needs to be balanced with keeping Energy Performance Certificates (EPCs) affordable and accessible – one way of achieving this would be to introduce EPCs with different 'confidence ratings' or 'levels' (Historic England, 2025). A robust methodology should be created with wide

stakeholder engagement, and Historic England is committed to supporting the development of this approach.

For traditionally constructed buildings (i.e., pre-1919), this might take the form of an 'Enhanced EPC' mechanism. In association with this, all upfront costs associated with related professional services required to provide robust, feasible, and practicable 'recommendations' within the 'Enhanced EPC' should also be included in the cost cap. Such an approach could assist with quality assurance and implementation while mitigating the risk of unnecessary costs and carbon emissions, as well as unintended consequences for occupant and building health due to inappropriate works based on inaccurate baseline assumptions or ill-considered recommendations.

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. 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.

References

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Question 29 – Having read the above, would you like to answer the questions for this section? Yes/No

Yes

Question 39 – What actions should government consider implementing to increase the number of smart meters installed in the social rented sector? Please select all that apply

- **Create obligations for social landlords to ensure their properties (including where there are communal energy sites) contain smart meters, regardless of whether the landlord or the tenant pays the energy bill**
- **Create obligations for social landlords to ensure their properties (including where there are communal energy sites) contain smart meters, only in cases where the landlord is the energy bill payer**
- **Create obligations for social landlords to arrange for smart meters to be installed in their properties (including where there are communal energy**
- **sites) during void periods and/or during retrofit projects.**
- **Create positive incentives for social landlords to arrange for smart meters to be installed in their properties, e.g. through SRS MEES.**
- **Create obligations for social landlords to actively promote smart metering to their tenants, e.g. through sharing literature.**
- **Support national and/or local campaign activity to engage social landlords and tenants and raise awareness of smart metering.**
- **Other**
- **Don't know**

Please explain why you have selected these options

Other

Incorporating smart meter data can improve EPC accuracy, but Historic England notes there are challenges associated with facilitating this for rural communities, off-grid properties, and those with poor internet connectivity. The introduction of SMETER data needs to be balanced with keeping EPCs affordable and accessible, and one method to do this would be to introduce EPCs with different 'confidence ratings' or 'levels'. For further information, please refer to our answer to Question 28.

Question 40 – Do you have any further comments or concerns regarding Minimum Energy Efficiency standards in the social rented sector or on longer term decarbonisation and net zero in the sector that you have not yet mentioned? Please explain your answer

Historic England believes that, for the sake of consistency across the rented sectors, Minimum Energy Efficiency Standards (MEES) in the Social Rented Sector (SRS) should be

aligned with those standards being devised for the Private Rented Sector (PRS) wherever possible. In both cases, it is essential that standards are created that are underpinned by a robust methodology and effective new Energy Performance Certificates (EPCs), and that such standards lead to appropriate recommendations for both modern and traditionally constructed buildings (i.e., pre-1919). While traditional buildings account for a larger proportion of privately rented homes (31.1% of the total, or 1,517,000 homes) than as a proportion of socially rented homes (6.7% of the total, or 279,000 homes), MEES for the SRS and PRS must alike be suitable for traditional buildings (MHCLG, 2024). Devising standards appropriate for both modern and traditional buildings will help ensure that unintended consequences are avoided, and the best possible outcomes for residents are achieved.

Historic England would also like to address the point made in paragraph 37 of this consultation that a 2024 DESNZ report "confirmed that energy efficiency measures, if correctly installed, are unlikely to exacerbate the risk of overheating. In particular, loft insultation, when installed with adequate ventilation was found to reduce risk of overheating. This highlights the importance of good quality installations." This is not the case in every situation, and in some instances the addition of insulation can lead to unintended consequences, such as increased overheating risk. In another DESNZ report, the DEEP project, in the 14 case study homes in their pre-retrofit condition, "only four of the 14 dwellings were shown to not overheat (i.e., "passed") according to CIBSE Criterion A (occupied rooms), and one passed CIBSE Criterion B (bedrooms only). Following the retrofits, five dwellings passed Criterion A and four passed Criterion B" which suggests that "retrofits can be beneficial in reducing overheating, but it still remains a significance issue for most homes", particularly in the case study homes with suspended timber floor insulation. The synthesis report goes on to mention the problems with the pass/fail methodology underpinning these assessments (DESNZ, 2024). This highlights the need for further research into overheating, and the attendant necessity to follow a whole building approach when planning energy efficiency interventions to avoid unintended consequences and maladaptation of buildings.

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