

Historic England's response to the MHCLG Consultation on a reformed Decent Homes Standard for social and privately rented homes

**Question 15 – Do you agree that age should be removed from the definition of disrepair?
Yes/No/Don't Know**

Yes

**Question 16 – Do you agree that the thresholds used to define disrepair for each component should be updated to reflect a more descriptive measure as proposed?
Yes/No/Don't Know**

Yes

**Question 17 – Do you agree that the number of items or components which must require major repairs for the component to be considered in disrepair should be reduced?
Yes/No/Don't Know**

Yes

**Question 19 – Do you agree that kitchens and bathroom components should be considered as “key” i.e. one or more in disrepair would cause a property to fail the DHS?
Yes/No/Don't Know**

Yes

Question 23 – If you have any views on these specific questions you would like to share?

Historic England has views on the following specific questions.

Concerning Question 15, we agree that age should be removed from the definition of disrepair – specifically, the part that states, “are old and”. Age does not necessarily mean that something is in poor condition or in a state of disrepair. Many traditional materials such as lime plaster and natural slates and masonry will have a much longer life expectancy compared to modern materials such as insulation and vapour check layers. However, age can support organisations to better understand when replacement is likely to be required and can help guide budgeting. Having knowledge of the age of certain materials, items, or services can help strategically to identify when wholesale replacement or refurbishments may be needed between tenancies to limit impact on the occupants.

Concerning Question 16, we agree that thresholds to define disrepair should be updated. At present, disrepair focuses on percentage of damage or repair required. This overlooks the fact that minor issues such as a slipped tile, missing pointing or flashing, failed rainwater goods, or faulty plumbing can contribute to much more serious issues resulting in damp, decay, or structural failure.

Thresholds should also take greater account of the materials of traditionally constructed buildings (i.e., pre-1919). 21% of all domestic buildings in England were constructed before 1919, meaning traditional buildings form a significant proportion of the housing sector and must be given due consideration (VOA, 2023) (Whitman et al, 2016). The properties of traditional buildings are explained in detail on the Historic England website, but in general, traditional and modern buildings differ fundamentally in how they manage moisture, air, and heat (Historic England, 2024). This difference is reflected in their construction and materials – for example, traditional buildings do not have or require Damp Proof Courses (DPCs) or Damp Proof Membranes (DPMs). Thresholds should also consider the competencies required to identify the true cause of disrepair, the appropriate repair type, and the knowledge and skills of those who undertake repair work on traditional buildings. Historic England is willing to assist in the drafting of a ‘descriptive definition of disrepair’ for buildings of traditional construction as well as designated buildings (i.e., listed). We are also keen to help define what is meant by ‘maintained in a reasonable state of repair’ for the components and materials in traditional/designated buildings.

Concerning Question 17, we agree that the number of items or components which must require major repairs for the component to be considered in disrepair should be reduced. We would like to flag the importance of undertaking repairs quickly, rather than leaving them to become a larger issue. As explained above, even small issues such as a slipped tile can contribute to much larger deterioration and health risks for occupants if they are not resolved swiftly.

Concerning Question 19, we agree that kitchens and bathroom components should be considered as 'key', i.e., one or more in disrepair would cause a property to fail the DHS. However, again we would like to underline the fact that traditional buildings have a different construction and comprise different materials than the modern counterparts, e.g., not all pre-1919 buildings either have or need a DPC. The reformed DHS should take account of these fundamental differences between building typologies.

References

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

Valuation Office Agency (2023). *Council Tax: stock of properties, Table CTSOP4.0: Number of properties by Council Tax band, property build period and administrative area as at 31 March 2023*. <https://www.gov.uk/government/statistics/council-tax-stock-of-properties-2023>.

Whitman et al, 2016 (2016). *Correlating Maintenance, Energy Efficiency and Fuel Poverty for Traditional Buildings in the UK – A scoping study funded by Cadw, Historic Environment Scotland and Historic England*.
<https://historicengland.org.uk/research/results/reports/7268/CorrelatingMaintenanceEnergyEfficiencyandFuelPovertyforTraditionalBuildingsintheUK>.

Question 24 – Do you agree that under the new DHS landlords should be required to provide at least three out of the four facilities listed? Yes/No/Don't Know

Yes

If there is anything further you would like to say on this specific proposal, please provide details here

With regard to external noise insulation, Historic England would require further understanding and descriptions of what this includes. When inappropriate or incompatible

materials are installed in traditionally constructed (i.e., pre-1919) or designated (i.e., listed) buildings, this has the potential to cause damp and decay or impact the building's significance. Potential harm could arise where insulation is proposed, or as a result of wholesale replacement of single glazed windows with double or triple glazing. Therefore, consideration must be given to the many sensitive ways to reduce noise levels in traditional and designated buildings without impacting their significance or changing their moisture pathways.

Question 26 – Do you agree with the proposal that all rented properties must provide child-resistant window restrictors that can be overridden by an adult on all windows which present a fall risk for children (as defined above including a recommended guarding height of 1100mm)? Yes/No/Don't know.

Yes

If there is anything else you would like to add on this specific proposal, please provide details here

There are residential buildings, such as flats and certain types of HMO, that are designed for internal escape and so the use of window restrictors does not cause an issue. However, the fire safety implications of window restrictors must be carefully considered in all modern and traditional (i.e., pre-1919) buildings with different escape plans. For example, in single family dwellings, where the upper floor level is less than 4.5m from external ground level, then Approved Document B permits window escape through escape windows (MHCLG, 2025). In this case, the means of escape from fire may be compromised if the windows are restricted, and so such an installation would be inappropriate.

References

Ministry of Housing, Communities and Local Government (2025). *Fire safety: Approved Document B*. <https://www.gov.uk/government/publications/fire-safety-approved-document-b>.

Question 28 – Do you think that landlords should provide suitable floor coverings in all rooms at the start of every new tenancy from an agreed implementation date?

Yes/No/Don't know.

Yes

Please add here if you have any views on this specific question

Historic England believes that if this requirement is incorporated into the Decent Homes Standard, the DHS must define 'suitable floor finish', and this definition and approach should also be applied for traditionally constructed buildings (i.e., pre-1919) if such additions would be technically compatible and practicable. It would be advisable for this change to the DHS to align with Approved Document L, with due regard for the potential of floor coverings 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 with coverings only being approved if they will not cause 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). Floor coverings should also be compatible with the substrate to prevent moisture entrapment, particularly where traditional building systems/materials are concerned. For further information on insulating floors in traditional buildings, please refer to Historic England technical advice (Historic England, 2025).

Additionally, floor coverings should be provided only if doing so will not increase overheating risk in extreme heat events. Supplying fixed carpets should not undermine the tenant's ability to maximise their cooling potential in summer, for instance, from thermal mass of solid floors or from sub-floor void ventilation in suspended timber floors. A good approach would be for the overheating risk to be assessed before floor coverings are approved for a property, or for the coverings to be easily removable.

References

Historic England (2025). *Insulating Floors in Historic Buildings*.
<https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/upgrading-thermal-elements-installing-insulation/insulating-floors-in-historic-buildings/>.

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

Question 30 – Do you agree with the proposal that the primary heating system must have a distribution system sufficient to provide heat to the whole home? Yes/No/Don't Know

Yes

Question 31 – Are there other thermal comfort requirements that you think should be included in the DHS beyond current MEES proposals? Yes/No/Don't Know

Yes

Question 32 – If there is anything else you would like to add on this specific proposal, please provide details here

Concerning Question 30, Historic England supports the proposal that the primary heating system must have a distribution system sufficient to provide heat to the whole home, with the caveat that in traditionally constructed buildings (i.e., pre-1919), any changes to the heating infrastructure ought to be carefully considered and implemented in a way that is both sensitive to the significance of the building and does not create the risk of unintended consequences.

Concerning Question 31, Historic England encourages the DHS to consider delivering thermal comfort in a way that goes beyond aligning with MEES. Thermal comfort is more nuanced than simply delivering 'warmth' in a home; as recent Historic England guidance states, "Building occupants will be satisfied with their environment if they don't feel discomfort. Many factors influence thermal comfort, such as air temperature, humidity, quality and movement of air, solar gain, and the emissivity (energy radiated from) and temperature of surfaces. The clothing and physical activities of building occupants also play a role." For further information on principles of thermal comfort, relevant to modern and traditional buildings alike, please refer to Historic England guidance (Historic England, 2024).

Finally, this section of the consultation focuses on the need to make homes warmer, but Historic England would also like to note the importance of considering overheating risks. This is linked to a broader concern with other tools and standards related to energy efficiency and thermal comfort. For example, MEES (Minimum Energy Efficiency Standards) and EPCs (Energy Performance Certificates) 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 consequence of greater overheating risks. Overheating is discussed further in resources produced by Historic England and the Good Homes Alliance (Historic England, 2025) (GHA, 2022).

References

Fatemeh et al. (2025). *A nation unprepared: Extreme heat and the need for adaptation in the United Kingdom*. <https://doi.org/10.1016/j.erss.2025.104065>.

Good Homes Alliance (2022). *Overheating in Retrofit and Existing Homes – Tool and Guidance*. <https://kb.goodhomes.org.uk/tool/overheating-retrofit/>.

Historic England (2024). *Occupants' Wellbeing*. <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/traditional-buildings-and-energy-efficiency/occupants-wellbeing/>.

Historic England (2025). *Overheating in Historic Buildings*. <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/upgrading-thermal-elements-installing-insulation/overheating-historic-buildings/>.

The Guardian (2025). *Number of UK homes overheating soars to 80% in a decade, study finds*. <https://www.theguardian.com/environment/2025/apr/16/uk-homes-overheating-soars-study/>.

Question 33 – Our expectation is that, to meet the DHS, landlords should ensure their properties are free from damp and mould. Do you agree with this approach?

Yes/No/Don't Know

Yes

Criterion E will be in addition to the requirements under Awaab's Law as it aims to prevent damp and mould reaching a level that is hazardous. If, however, damp and mould in a property were to become severe enough to cause 'significant harm', landlords would have to comply with Awaab's Law to ensure prompt remediation and, if they do not, tenants will be able to take action in the courts. The damp and mould standard in the DHS should however help to prevent damp and mould getting that severe. Do you agree with this approach? Yes/No/Don't Know

Yes

Question 35 – If there is anything else you would like to add on this specific proposal, please provide details here

Historic England is in full support of this consultation's proposal to mandate that landlords keep their properties free from damp and mould, as this represents a significant step towards boosting the wellbeing of tenants across the rented sectors. We would like to recommend, however, that careful consideration is given to retrofitting measures which will be recommended by this and parallel government initiatives (e.g., MEES, tackling fuel poverty, etc), because there is a risk that such measures could lead to an increase in mould and damp.

This is an acute concern for buildings of traditional construction (i.e., pre-1919). As mentioned in our answer to Question 23, traditional and modern buildings differ fundamentally in how they manage moisture, air, and heat (Historic England, 2024a). In traditional buildings, the normal movement of these factors can be disrupted by ill-considered retrofitting measures, particularly insulation. This was explored in recent Historic England technical advice: "Energy efficiency interventions in a building of traditional construction often affect its hygrothermal performance (the movement of moisture, heat and air) and the innate ability of the building fabric to manage fluctuations in humidity and

temperature. Implementing energy efficiency and carbon saving measures may lead to moisture accumulating within the building fabric and/or the indoor environment” (Historic England, 2025).

Consequently, it is essential that the actions resulting from different parts of the reformed DHS do not end up at odds with each other – i.e., it would be counter-intuitive if a landlord installed insulation to comply with Criterion D (thermal comfort), only to find that the resulting mould and damp growth put them in violation of Criterion E (keeping properties free of damp and mould). The best way to ensure that all possible impacts of retrofitting interventions have been considered is to follow the 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, 2024b). Beyond failing to achieve DHS compliance, the consequences of failing to consider potential ramifications are significant and relevant to modern and traditional buildings alike, 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, 2024c).

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). *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/>.

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

Historic England (2025). *Risks of Energy Efficiency Interventions in Buildings of Traditional Construction*. <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/improving-energy-efficiency-through-mitigation/risks-of-energy-efficiency-interventions/>.

Question 42 – What information and/or topics would you like included in the proposed additional best practice guidance for social and private landlords and tenants? (Select all that apply) Please select what you would like to include:

- Accessibility
- Additional home security measures e.g. external lighting and CCTV
- Adaptations to climate change
- Digital connectivity
- Electrical Vehicle Charging
- Furniture provision
- Water efficiency measures
- Other

Other

If you have selected 'Other', please say what you would like to be included

It is important that landlords are provided with up-to-date guidance on how to manage properties of traditional construction (i.e., pre-1919). Historic England (and other organisations) can help in that regard, as there is plenty of free advice available online on looking after traditional and designated (i.e., listed) buildings. The following webpages will support landlords in making appropriate decisions for these types of buildings, and it would be beneficial to see this guidance included alongside the DHS:

Good Homes Alliance (2022). *Overheating in Retrofit and Existing Homes – Tool and Guidance*. <https://kb.goodhomes.org.uk/tool/overheating-retrofit/>.

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

Historic England (2025). *Building Regulations, Approved Documents and Historic Buildings*. <https://historicengland.org.uk/advice/technical-advice/building-regulations/>.

Historic England (2025). *Your Home*. <https://historicengland.org.uk/advice/your-home/>.

Question 51 – If there is anything else you would like to add on this specific section, please provide details here

On the topic of implementing the Decent Homes Standard, Historic England would like to flag the importance of creating the well-trained workforce that will be needed to deliver decency across rented properties. Historic England's recent Skills Needs Analysis points out that almost a third of traditionally constructed homes (i.e., pre-1919) fail to meet the Decent Homes Standard, as compared to 11% of modern homes (Historic England, 2024). This suggests a significant latent demand for repair, maintenance, and retrofit if we are to provide high-quality pre-1919 homes – this will require both new entrants into the workforce and the upskilling of those already working in these fields. For further information on building the workforce to improve the UK's traditional building stock, please refer to Historic England's response to the recent ESNZ Committee call for evidence on workforce planning (Historic England, 2025). Another useful resource is the Heritage and Carbon report on addressing the skills gap that Historic England collaborated on in 2023 (Grosvenor et al., 2023).

References

Grosvenor, The Crown Estate, Historic England, The National Trust, Peabody (2023). *Heritage and Carbon: Addressing the Skills Gap*. https://www.grosvenor.com/getattachment/77042425-b1cc-4c45-b338-5193a1c93d32/Heritage-and-Carbon_Final_Digital_DPS.pdf.

Historic England (2024). *Skills Needs Analysis for the Repair, Maintenance and Retrofit of Traditional (Pre-1919) Buildings in England, 2024*. <https://historicengland.org.uk/images-books/publications/skills-needs-analysis-2024-repair-maintenance-retrofit-traditional-pre1919-buildings/>.

Historic England (2025). *Historic England's response to the Energy Security and Net Zero Committee Call for Evidence: Workforce planning to deliver clean, secure energy*. <https://historicengland.org.uk/content/docs/consultations/response-esnz-committee-secure-energy-jan25/>.

Question 52 – Do you agree that providers should be given flexibility from meeting the DHS where there are physical or planning factors preventing compliance? Yes/No/Don't Know/Not applicable

Yes

If there is anything else you would like to add on this specific question, please provide details here

Historic England believes that changes to the DHS should align with Approved Document L, allowing for special considerations for buildings of traditional construction (i.e., pre-1919). Therefore, there should be exemptions from enacting certain measures that pose a risk to the building, and measures should only be enacted “where this would not 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 “only if doing so will not cause long-term deterioration of the building's fabric or fittings. In particular, this applies to historic and 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).

Additionally, it is essential that consideration is given to the technical compatibility of energy efficiency interventions used in traditional buildings to prevent risks to the health of occupants and to the building fabric (Historic England, 2025). Particular attention is needed with regards to not only water vapour but also liquid water transfer mechanisms (Marincioni et al., 2025).

References

Historic England (2025). *Risks of Energy Efficiency Interventions in Buildings of Traditional Construction*. <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/improving-energy-efficiency-through-mitigation/risks-of-energy-efficiency-interventions/>.

Valentina Marincioni, Kaat Janssens, Toby Cambray (2025). *Moisture properties of insulation materials and their applicability to traditional construction*. https://mcusercontent.com/696066175dec069fd4dbc8c17/files/065e163d-35cf-4a7c-6f79-6546e88c4df9/Retrofit_materials_permeability_July_25.pdf.

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