Historic England's response to the DESNZ consultation: Reforming Consumer Protection for Home Upgrade Schemes

Question 1 – Does the case for change accurately describe the root causes of issues with the current consumer protection system? [Yes / No] Please outline any additional issues with evidence where possible.

No – Historic England agrees with the case for change set out in this consultation but the diagnosis misses one of the major causes of building maladaptation – a poor understanding of building performance and particularly of traditional building performance (i.e., buildings constructed after 1919). In traditionally constructed buildings, risks may arise from interactions between products, existing fabric, substrates, moisture movement, ventilation, workmanship, and whole-building behaviour.

Tackling these risks requires a better understanding of traditional building performance, and stronger consumer protection will therefore depend on early advice, competent assessment, clear product information, proportionate assurance, and effective audit and redress routes that can respond to wider building-fabric impacts as well as immediate installation defects. Since about a fifth of all English homes were built before 1919 (MHCLG, 2025), it is crucial that this traditional proportion of the domestic sector is effectively represented by the reformed consumer protection system.

Overall, traditional buildings perform differently to those of more recent construction. This difference is explored in detail in Historic England's technical guidance: most traditional buildings use natural materials, such as earth, stone, brick, and timber, that have the capacity to absorb, store, and later release moisture and heat. These properties help moderate internal fluctuations in humidity and temperature, providing and maintaining a healthy, comfortable, and more stable indoor environment without harming the building fabric. There is a continuous and interdependent exchange of moisture (hygral) and heat (thermal) between the building fabric and the surrounding air. (Historic England, 2025).

These characteristics mean that traditional buildings perform in a different way than their modern counterparts, which are typically built to be more impermeable to the movement of heat and water. Poor understanding of these dynamics can lead to the installation of

inappropriate retrofit measures which interfere with the building's processes of absorbing, storing, and releasing moisture and heat.

To be truly successful, a consumer protection system should be built on a strong understanding of building performance, traditional and modern, because without this, consumers will remain at risk from the installation of inappropriate measures and the ensuing negative consequences. There have already been several cases of maladaptation in the historic environment in recent years, and a reformed consumer protection system is needed to prevent more such cases (Historic England, 2024). Our response to this consultation will explore the different steps needed to ensure that an understanding of traditional building performance is integrated into all aspects of the reformed consumer protection system, including building oversight, advice journey, skills, etc.

References

Historic England (2024). *When Retrofit Goes Wrong*.

Historic England (2025). *Properties of Traditional Building Construction*.

Ministry of Housing, Communities and Local Government (2025). *Annex tables for English Housing Survey 2024 to 2025 headline findings on demographics and household resilience; Chapter 1: Profile of households and dwellings annex tables; Annex Table 1.6*.

Question 3 – What are the main challenges in aligning the future consumer protection system with the reformed building oversight regime and, if applicable, how would you address them?

A significant challenge lies with ensuring that traditional buildings are properly understood and adequately protected by a reformed consumer protection scheme, which is aligned to a new building oversight regime. We would advise that these new systems align with Approved Document L of the Building Regulations (MHCLG, 2023a). Historic England has recently published guidance for applying Approved Document L to historic and traditionally constructed buildings, which can serve as a useful guide (Historic England, 2025a).

In sum, Approved Document L requires special protections and considerations for traditional buildings that are being retrofitted, and such considerations should be built into a reformed consumer protection system to ensure that inappropriate measures are not installed. Beyond the special considerations for not unacceptably altering a dwelling's character or appearance, Section 0.10 states that, “The energy efficiency of historic and traditional dwellings should be improved 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.” (MHCLG, 2023b).

However, an effective consumer protection system should go beyond the protection of “fabric and fittings” laid out in Approved Document L (though such protections remain important). Safety should encompass reasonably foreseeable secondary harms arising from product choice and system interaction, including moisture accumulation, decay mechanisms, and resultant risks to occupant health and fabric integrity. This will serve to lower the risk of installing measures that could harm occupant health, such as insulation that leads to damp and mould.

The other Approved Documents relevant to energy efficiency are discussed in a Historic England technical advice webpage and will also underpin a better understanding of traditional building performance, thus protecting consumers from adverse outcomes (Historic England, 2025b).

References

Historic England (2025a). *Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to Historic and Traditionally Constructed Buildings*.

Historic England (2025b). *Building Regulations and Energy Efficiency of Buildings of Traditional Construction*.

Ministry of Housing, Communities and Local Government, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2018 to 2021) (2023a). *Conservation of fuel and power: Approved Document L*.

Ministry of Housing, Communities and Local Government, Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2018 to 2021) (2023b). *Approved Document L, Conservation of fuel and power, Volume 1: Dwellings, 2021 edition incorporating 2023 amendments*.

Question 8 – What data and performance information is most important for monitoring the effectiveness of the system? Please select all that apply. [consumer queries and complaints / building control notifications and additional lodgements / audit findings / scheme data / installer, retrofit professional and installation performance indicators / guarantee claims and outcomes / home condition data, energy use data before and after / other (please specify in your written response)] Please explain your answer.

All these types of data and performance information are important for monitoring the effectiveness of the system. It is important that the national regulator receives safety-relevant information on problems, complaints, incidents and adverse outcomes, and that this is made available (possibly in anonymised or aggregated form) to support wider learning and research benefits. Without this, information about failure modes and emerging risks can remain both fragmented across the supply chain and difficult to access beyond informal reporting, limiting the ability to identify patterns, improve guidance, and prevent recurrence.

Information about traditional building performance (i.e., pre-1919 buildings) is especially important. Product information and any central product information library should clearly state the construction typologies and substrates on which the product or system has been tested or assessed, limitations of validity, and 'do not use' scenarios, including where suitability for traditional construction has not been assessed, and any assumptions made in testing or assessment that affect transferability to other contexts.

For further details on appropriate insulation materials for traditional buildings, please refer to recent STBA research (STBA, 2025), and for further information on data and construction products, please refer to Historic England's recent responses to the consultation on the Construction Products Reform White Paper (Historic England, 2026a) and to the consultation on the General Safety Requirement for Construction Products (Historic England, 2026b).

References

Historic England (2026a). *Consultation response for Construction Products Reform White Paper*.

Historic England (2026b). *Consultation on the General Safety Requirement (GSR) for Construction Products*.

Sustainable Traditional Buildings Alliance (2025). *Moisture properties of insulation materials and their applicability to traditional construction*.

Question 11 – To what extent do you agree that the proposed consumer journey would be clear and easy for consumers and installers to navigate? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not sure]

Agree

Question 12 – Which aspects of the proposed consumer journey are most likely to improve consumer outcomes? Select all that apply: [Access to impartial advice / Consumer protection service as the primary point of contact / Clearer information on installers, retrofit professionals and processes / Ongoing guidance after installation / Centralised case management by the consumer protection service / Other (please specify in your written response) / None of the above] Please explain your answer.

Access to impartial advice; Clearer information on installers, retrofit professionals and processes; Ongoing guidance after installation.

To improve consumer outcomes, it is important that the consumer journey is built on a good understanding of modern and traditional (i.e., pre-1919) building performance and the compatibility of different construction types with proposed interventions or materials. This understanding should be built into the following significant aspects: access to impartial advice, clearer information on installers, retrofit professionals, and processes, and ongoing guidance after installation.

Firstly, impartial advice is crucial to ensure that consumers are set on the right path from the outset. To this end, Historic England has been advising DESNZ on the development of the Home Energy Advice webpages, to ensure that the public understands the different ways in which their buildings perform, the risks of maladaptation, and the relevant steps of the planning process. Moreover, the consumer journey ought to advise on which overarching approach to retrofit to take so as to minimise the risk of maladaptation. For modern buildings as well as traditional buildings, Historic England recommends the whole building approach, which is a systematic process for devising and implementing suitable, balanced, and well-integrated solutions based on a building's properties, performance, usage, and historic significance where relevant. This does not mean retrofitting every part of a building at once – rather, that a building should be considered as a holistic system to find the most suitable and balanced solutions for that particular property (Historic England, 2024a).

Secondly, clearer information on competent installers, retrofit professionals, and processes is essential for delivering quality works. If consumers are looking to retrofit their traditionally constructed home, they should know to look for professionals that have the necessary understanding of traditional buildings and suitable retrofit measures – unfortunately, such knowledge is in short supply. In September 2024, Historic England published 'Skills Needs Analysis for the Repair, Maintenance & Retrofit of Traditional (pre-1919) Buildings in England'. Based on a survey of more than 700 contractors working on traditional buildings, the research found that nearly 46% of respondents were unsure if their existing skills and knowledge would be suitable for installing retrofit measures in pre-1919 buildings (Historic England, 2024b).

Consumers should be supported to look for relevant levels of competence as demonstrated by key qualifications and ongoing continuing professional development, such as the Level 3 Award in Energy Efficiency for Older and Traditional Buildings which is a requirement of PAS 2035. To support this, a greater understanding of traditional building performance needs to be embedded into mainstream training for construction and retrofit, given its relevance to a large proportion of this work. To help enable this, a free version of the course handbook for the Level 3 Award in Energy Efficiency for Older and Traditional Buildings has recently been co-published by Historic England for training providers (Cadw, Historic England, Historic Environment Scotland, 2024).

Thirdly, guidance after installation is also crucial for ensuring positive outcomes. Repair and maintenance is a low-cost pathway to improving energy efficiency and lowering bills in its own right, but good practices are also essential after retrofit works. Consumers who have retrofitted their traditional buildings should be made aware of the benefits of keeping their

homes in good conditions, as well as what to look out for to prevent problems from deteriorating. Historic England has published technical advice on Maintenance and Repair for Energy Efficiency which can be instructive in this regard (Historic England, 2024c).

Further guidance on the maintenance stage is discussed by Historic England as part of the whole building approach (Historic England, 2024d). After handover, interventions should be checked and evaluated to make sure everything is working as planned. Energy bills or more involved evaluation methods can be used to compare levels of energy use before and after improvements. Post-occupancy evaluation (POE) may be carried out, and advice should also be given on the importance of maintaining ventilation in reducing the risks of condensation and ensuring good indoor air quality.

References

Cadw, Historic England, Historic Environment Scotland (2024). *Course Handbook: Level 3 Award in Energy Efficiency Measures for Older and Traditional Buildings*.

Historic England (2024a). *Whole Building Approach for Historic Buildings*.

Historic England (2024b). *Skills Needs Analysis for the Repair, Maintenance and Retrofit of Traditional (Pre-1919) Buildings in England, 2024*.

Historic England (2024c). *Maintenance and Repair for Energy Efficiency*.

Historic England (2024d). *Stage 5: Use, Evaluate and Maintain*.

Question 15 – To what extent do you think the proposed changes to oversight of standards and new competence frameworks would improve installation quality, including for multi-measure installations? [To a large extent / To some extent / To a limited extent / Not at all / Not sure] Please explain your answer.

To some extent – raising the bar for certification bodies and ensuring that retrofit roles (including those defined under the PAS 2035/2030 standards) are performed by professionals who meet the new competence requirements will have a positive effect on overall installation quality and reduce fragmentation and confusion across the retrofit sector. Not all projects will use PAS standards however, so competence requirements for the whole retrofit sector need to be robust and consistent.

Where traditionally constructed buildings are concerned (i.e., pre-1919), standards and competence frameworks should require duty holders to demonstrate access to knowledge and experience of traditional building performance, including moisture risk management. The knowledge, skills, and experience of those who have only been trained on/have worked on new build or more modern buildings may be insufficient because in older buildings, performance and risks often depend on system interaction and material behaviour that differ from those assumed in modern construction, as described in Historic England's technical advice (Historic England, 2025a).

Therefore, to ensure that reformed oversight of standards and new competence frameworks will improve installation quality, it is essential that both include a need for retrofit professionals working on traditional buildings to understand how such properties perform. An advisable minimum level of verified competence would be for professionals to have attained the Level 3 Award in Energy Efficiency for Older and Traditional Buildings. A version of the course handbook for this training has recently been co-published which aligns with Historic England technical advice (Cadw, Historic England, Historic Environment Scotland, 2024); Historic England hopes that current and future registered training providers will align their delivery with this free resource. Attaining this qualification is currently a requirement under PAS 2035 although, as will be discussed in our response to Question 17, it is not always clear if this is carried out in practice.

Additionally, the consultation mentions the updating of insulation guides to be carried out in partnership with industry. Historic England would be keen to contribute to this process to ensure that insulation guidance is compatible with traditional construction. We have a range of technical advice pertaining to insulation which can be drawn on (Historic England, 2025b), including a recently updated page on insulating walls (Historic England, 2026).

References

Cadw, Historic England, Historic Environment Scotland (2024). *Course Handbook: Level 3 Award in Energy Efficiency Measures for Older and Traditional Buildings*.

Historic England (2025a). *Properties of Traditional Building Construction*.

Historic England (2025b). *Upgrading Thermal Elements: Installing Insulation*.

Historic England (2026). *Insulating Walls in Historic Buildings*.

Question 17 – Which approaches would be most effective for strengthening oversight of installers and retrofit professionals? Select all that apply: [Stronger audit requirements / Clearer competence frameworks / Public register of professionals / Stronger role for certification bodies / Greater government oversight / Other (please specify in your written response)] Please explain your answer.

Clearer competence frameworks; Public register of professionals; Stronger role for certification bodies.

Oversight of the workforce is fragmented, and so it is important that there are clearly defined expectations and requirements of a level of knowledge and skill commensurate with the risk involved. When considering the retrofit of traditionally constructed buildings (i.e., pre-1919), it is crucial that those involved in the process have an understanding of how buildings of different ages and construction types perform, as well as any heritage legislation which may be relevant. This understanding should be built into the following significant approaches: clearer competence frameworks, a public register of professionals, and a stronger role for certification bodies.

Firstly, Historic England has co-produced, with sector partners, a range of skills and knowledge statements for working in heritage construction which should be used in the development of these competence frameworks (Historic England, 2026). We are involved with the ICC Task and Finish Group on Retrofit Competence and will contribute to the development of frameworks and occupational standards as the process unfolds, but the need for broader understanding of traditional buildings in the construction sector cannot be understated.

Secondly, on public registers, PAS 2035 currently requires individuals undertaking specific retrofit roles to hold the Level 3 Award in Energy Efficiency Measures for Older and Traditional Buildings (or an appropriate conservation accreditation, in some cases). It is unclear, however, how that is tracked and monitored, and how those commissioning retrofit works could check that the individuals they are appointing and/or who will be working on the project have completed the training. Nor is it clear how competence of any retrofit professional is proposed to be demonstrated or monitored where PAS 2030/2035 are not mandated and therefore not followed. While these standards may represent best practice in process, this level of competence and diligence should be achieved and demonstrated by all retrofit professionals, including those operating outside of the PAS compliance model.

For this purpose and more broadly, it would be beneficial to have a reliable public register of professionals, maintained by the new consumer protection service. This register should align with and build upon existing certification processes, ensuring more robust requirements to demonstrate competence and promote continuing professional development. Where retrofit roles are fulfilled by individuals who are not already members of established professional bodies for construction (such as CIOB/RIBA/RICS/CIAT/ICE, etc.), it would be our recommendation that a set of professional standards and codes of conduct be developed for all retrofit professionals and installers in line with these models.

Thirdly, certification bodies should be required to demonstrate competence, or formal access to competence, to assess products used with traditional substrates and assemblies, including the ways they interact with moisture movement (in liquid, vapour, and solid form), salts, and long-term fabric performance. Certificates should explicitly state the construction typologies and substrates covered by the assessment and where extrapolation is not valid. Where products are commonly marketed for use on traditional buildings, certificates should identify any known constraints relating to moisture movement and compatibility with traditional materials, where relevant to foreseeable use. Without these safeguards, there is a risk that certification may be interpreted as broadly applicable beyond the conditions in which performance has been demonstrated, and products may be misapplied in different construction contexts with adverse consequences for fabric durability, occupant health, and wider safety outcomes. For further information on moisture properties of insulation materials in traditional buildings, please refer to recent STBA research (STBA, 2025).

References

Historic England (2026). *Skills and Knowledge Statements for Working in Heritage Construction*.

Sustainable Traditional Buildings Alliance (2025). *Moisture properties of insulation materials and their applicability to traditional construction*.

Question 20 – To what extent do you agree that an intelligence-led risk-based approach to audit and assurance would improve system performance? [Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not sure] Please explain your answer, including which data or risk indicators would be most useful.

Agree – manufacturers should be required to report significant failed systems, repeated installation failures, and other safety-relevant adverse outcomes to the independent regulator so that lessons are captured, patterns are identified early, and guidance and evidence expectations can be improved. This should include cases where products perform acceptably in isolation but contribute to unsafe outcomes in real-world assemblies or common use scenarios. Protected reporting routes would help ensure issues are spotted and acted on before problems become widespread. These protections are particularly important because issues are often first identified by practitioners closest to the work, who may fear commercial or employment repercussions for raising concerns.

Question 31 – What are the most significant impacts of the proposed reforms on installers, retrofit professionals and other market participants? Please include any impacts on SMEs, third sector organisations, workforce capacity and market entry where relevant.

Historic England is concerned about impacts on traditional buildings (i.e., pre-1919) in particular. Disproportionate costs and administrative burdens, particularly where requirements assume mass-production testing models or high-cost certification routes, may lead SMEs and micro-producers, including craft-based suppliers of traditional materials, to reduce output or withdraw from the market. This would constrain the supply of materials essential for conservation repairs and maintenance and could increase reliance on less sustainable substitutes.

This problem is demonstrated by the impact of warranty requirements on traditional buildings. At present, government schemes require materials used in retrofit schemes to have a 25-year warranty. While Historic England supports the principle of consumer protection behind this requirement, it should be equitable and not inadvertently reduce consumer choice or increase risks. Products suitable for use on traditional buildings (which are vapour-open and/or capillary active and often bio-based/natural fibre in nature) are

often produced by SMEs rather than large companies. It is our understanding that such organisations often lack the time, funds, or ability to obtain such extended warranties for their range of products. This means that technically compatible traditional materials are often excluded from use in government schemes because they lack the required warranties, and this can lead to traditional buildings having materials installed which meet the warranty criteria but are otherwise inappropriate and risk maladaptation. This creates an imbalance between materials applicable for use on modern and traditionally constructed buildings and a barrier for SMEs bringing their products to market at this level. For details on appropriate insulation materials for traditional buildings, please refer to STBA research (STBA, 2025).

This issue highlights again how a reformed consumer protection system will be built on an unstable foundation if it fails to incorporate an understanding of traditional buildings and their performance. In this case, the system is unintentionally creating a risk of adverse consumer outcomes, and so Historic England recommends that warranty requirements are reviewed in consultation with relevant stakeholders, including manufacturers, suppliers and their representatives, guarantee agencies, and other stakeholders (e.g. NIA, NFIG, ASBP, SWIGA, IAA, UKCMB, STBA, HE, HES, Cadw, NI, TrustMark, etc); Historic England would be glad to take part in such a review. It would be preferable if warranty coverage was aligned with anticipated products lifespan, which is about 6-10 years for most construction products.

Changed rules should be supported by practical guidance that defines reasonable steps for different product types and supply chains, including merchants, specialist suppliers, and SMEs. Simple templates, low-burden tools, tiered expectations by risk, and proportionate evidence pathways would support consistent compliance without undermining the supply of traditional materials or conservation practice.

References

Sustainable Traditional Buildings Alliance (2025). *Moisture properties of insulation materials and their applicability to traditional construction*.