

A reformed Decent Homes Standard for social and privately rented homes

G15 Response

September 2025

About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 880,000 homes across the country, including around one in ten homes for Londoners. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £2bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

For more information, please contact: G15@Peabody.org.uk

Position statement

We welcome the Government's commitment to raising standards across the social rented sector. Our number one priority is to ensure residents' homes are safe, comfortable, and energy efficient. We support the updated Decent Homes Standard (DHS) but believe it must strike the right balance between ambition and deliverability.

Our key recommendations are:

- The standard should remain focused on what happens *inside the home*.
- Targets for compliance should be aligned with regulations on Minimum Energy Efficiency Standards (MEES) and be implemented in 2037 to reflect sector capacity and skills shortages.
- Reporting expectations and the move towards subjective assessments must be handled carefully to avoid unintended consequences, and the definition of disrepair must be reviewed to ensure it is fit for purpose.
- The Government should give serious consideration to funding to avoid difficult trade-offs in our spending and investment.
- Policy certainty is essential, especially given the pace of wider policy change affecting the sector and the ongoing seriousness of the multiple housing crises facing Londoners.

Scope: keep DHS within the home

We support the inclusion of new components that directly affect residents' experience of their homes, such as window restrictors, secure locks, and safe flooring. These are practical improvements that reflect residents' day-to-day experience of their home. While we acknowledge that a home extends beyond the front door, we do not agree with the proposed extension to internal communal areas and shared outdoor spaces. The new standards should remain focused on conditions within the home.

We already manage and repair internal communal areas and shared outdoor spaces if issues arise and will continue to do so. However, adding a regulatory reporting requirement introduces ambiguity about ownership, boundaries, and responsibilities. It would also significantly lengthen surveys, which comes at a cost.

The Government has already recognised these challenges in the private rented sector, ruling out extending the requirement to private landlords. In practice, registered providers face the same challenges: mixed tenure blocks, complex estate management agreements, and the involvement of external managers. There is also the risk of passing disproportionate costs to leaseholders.

The original DHS focused on the condition of the home itself, with measures centred on internal components and thermal performance. It was designed as a catch-all piece of regulation to ensure minimum standards inside the home. Other elements of the built

environment – such as internal communal areas, external features, and wider estate management – are already addressed through different regulatory regimes and housing management responsibilities. We do not believe it is logical or practical to extend this specific regulatory standard to internal communal areas and shared outdoor spaces, given the complexities of tenure, ownership, and existing statutory duties.

Implementation, alignment of targets and skills capacity

We believe that 2037 is the most reasonable and achievable implementation date. This would give landlords the time required to carry out initial surveys, secure funding and contractors, and plan works strategically across large portfolios. It reflects the precedent set by the first DHS and would help avoid a short-term spike in demand for core services.

Members also believe MEES deadlines should be aligned to this, as outlined in the G15 response to Minimum Energy Efficiency Standards consultation. Aligning both targets would allow landlords to plan retrofit programmes more strategically, sequencing work for maximum efficiency and impact.

This work also relies on supply chain and workforce capacity. The sector already has a shortage of skilled surveyors, retrofit assessors, and contractors. We support the extension of these standards to the Private Rented Sector, but this will increase demand further. Without a realistic implementation date, we are likely to experience bottlenecks across the sector, and escalating costs and programmes that are more disruptive to residents than necessary.

Cost and funding

Members' estimates suggest the average cost to upgrade each home is between £5k and £6k, roughly in line with the Government impact assessment. However, member modelling suggests this would cover compliance with the initial upgrade requirements, but it significantly underestimates the ongoing operational impact.

Additional surveyors, data management, system reconfigurations, staff training, and the new flooring requirements are not fully accounted for. These elements represent substantial costs and operational burdens beyond the initial compliance figure.

Flooring alone could cost upwards of £2,000 per property, considerably more than the government's assumption of £1,032 per home. It would also add 1–2 days to void turnaround times, with the associated loss of rental income, and evidence from members suggests that 75–90% of homes may require new floor coverings at relet, far higher than the government's 7% assumption.

Members are in very different financial positions, reflecting their history, stock profile, and the scale of investment required. Some have begun to recover capacity after years

of financially challenging circumstances and are starting to plan ahead with greater certainty. However, others are still managing the financial impact of past pressures and face a longer path to recovery. This variation has a direct bearing on the pace and scale at which providers can deliver against new regulatory requirements.

Over the last decade, the sector has absorbed a series of shocks that have constrained investment. The 1% annual rent cuts between 2016 and 2020 reduced income by billions. This was followed by rent caps that further limited income growth at a time when inflationary spikes in labour, materials, and energy significantly increased costs. At the same time, the building safety crisis has required urgent and sustained investment in fire safety and cladding remediation, rightly prioritised but diverting substantial resource away from planned investment in homes.

As a result, many members have had to reshape programmes around immediate safety and compliance, making these the priority for investment. While this has ensured residents' safety and kept homes at a decent baseline, it has also meant delaying or scaling back longer-term upgrades. This is the unfortunate context for these new DHS requirements, which add additional costs that must be managed alongside existing programmes.

It also underscores why careful phasing, funding support, and alignment with other standards are essential to make the new DHS deliverable in practice.

The first decent homes programme succeeded because it was properly funded: social landlords spent at least £37bn in the first decade, of which £22bn came from Government grant. To replicate this success, at the pace required, a new Warm and Decent Homes Fund will be needed to support landlords in meeting the updated standard without compromising other essential investments.

Reporting expectations and subjectivity

We support the principle of shifting the DHS towards a more resident-focused and condition based assessment. This reflects the approach landlords are already taking: investing in homes holistically, listening to residents and focusing on health and wellbeing.

However, increased subjectivity must be carefully defined in regulation to avoid confusion, inconsistent interpretation and unintended outcomes.

- Disrepair should be limited to issues that make a component unusable, pose a clear health and safety risk, or are not being addressed by the landlord. Standard day-to-day repairs should not be reported as "disrepair".
- Components such as lifts pose particular challenges. They may go in and out of service within a year, which could render all homes in a block "non-decent" even if the landlords are addressing the issue promptly.

- The added reporting has cost implications. More subjective standards mean more staff time on assessments, data entry and regulatory reporting, as well as more complex resident communications.
- We are also concerned about setting realistic expectations for residents under standards that are much more ambiguous and rely on subjective judgements. It may lead to increased disputes and complaints, which ultimately erode trust and damage our relationship with residents.

We ask the Government to strike the right balance: enabling a greater focus on residents' lived experience while making sure definitions are precise enough to provide clarity for landlords, regulators, and residents alike.

Wider policy environment

Finally, it is vital to consider the updated DHS in the context of other policy reforms. Rent convergence, the forthcoming SAHP bidding round, and major changes to building safety regulation all affect how and when landlords can commit to investment. Certainty is essential if landlords are to plan effectively and deliver ongoing improvements for residents.

We support the ambition behind the updated DHS and the drive to raise standards across the social rented sector. But to succeed, it must:

- Remain focused on the home, not internal communal areas and shared outdoor spaces
- Align with MEES and be delivered by 2037
- Be underpinned by realistic assumptions about cost, skills and capacity
- Where necessary, be supported with an updated Warm and Decent Homes fund
- Ensure that a move to more subjective standards doesn't undermine reporting requirements, and the definition of disrepair is fit for purpose

Done right, the updated DHS can ensure homes are safe, warm, and fit for the future.

Question breakdown:

[Proposal 1: Updating the definition of disrepair \(Criterion B\)](#)

Question 11:

Do you agree that age should be removed from the definition of disrepair?

Yes

Members agree that the definition of disrepair should be updated to be more reflective of the resident experience and realities of daily living. However, we note this comes with some practical issues that should be considered. Clear guidance will be important so

that residents know what they can expect from their landlord and to ensure consistency across the sector.

Removing age from the definition introduces subjectivity into condition-based assessments, which may create inconsistency across the sector. It could also make long-term investment planning more complex, particularly where lifecycle modelling has provided a clear and efficient framework for carrying out block or estate-wide programmes. It may also shift resources from planned programmes to responsive repairs, reducing efficiency and increasing costs.

While some members are already moving towards a more condition-led approach, not all have shifted their programmes in this way. A sufficient lead-in period is therefore essential to allow providers to adapt delivery models and align planned investment with the new expectations. Age will also continue to be needed for accounting and regulatory purposes, including depreciation and long-term financial planning. To support this, the government should work closely with social landlords to develop detailed clarifications and guidance, ensuring that removing age from the disrepair definition does not create unrealistic expectations for residents or excessive reporting requirements, and that component age continues to be recognised for financial and asset management purposes.

Question 12: 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

We support the principle of reviewing the definition of disrepair and ensuring it is fit for purpose.

The Government, however, needs to give serious consideration to how this is defined, measured and reported against. Thresholds must be practical, proportionate, and focused on issues that directly affect residents' ability to live safely and comfortably in their homes. We believe that for something to be considered 'disrepair', it should be limited to cases where the component is unusable, creates a material health or safety risk, or where a landlord is failing to act on a significant issue. Other issues could then be allowed to be picked up through planned works.

It must also be made clear that routine or minor repair requests (such as a sticking door or a single slipped tile) should not trigger a DHS failure, require reporting to the Regulator, or be classified as disrepair. Moreover, descriptors such as "not weather tight" should only apply where there is evidence of water ingress or a material risk to the property, rather than minor issues that do not impact usability. Without clear

thresholds and descriptions, there is a risk of over-reporting, inconsistent application, and confusion for both landlords and residents.

We recommend that the Government works with the sector, residents, and technical experts to develop clear guidance and practical examples for each component, so thresholds are applied consistently.

Question 13: 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?

Don't Know.

We agree that some level of adjustment to thresholds is useful, to ensure they capture cases where disrepair is posing a risk to residents' health and safety or preventing residents' from using key components. However, as discussed in response to question 12, we do not think the current proposed definition always strike the right balance.

Question 14: Do you think that removing age as a consideration from disrepair would lead to less planned maintenance of your properties and more reactive repairs carried out in response to issues raised by tenants?

Yes.

Some members expect this change will make planned investment harder to deliver and increase the tendency of reactive repairs being used to address issues raised by tenants. They note that moving from lifecycle replacement to condition-based measures, while preferable in principle, introduces subjectivity and increases the likelihood of a more reactive planned programme of maintenance. For example, if works are not delivered as part of a block-wide programme, we lose the efficiencies of scale, and it becomes more expensive to carry out the same repairs individually.

We recommend that the Government works closely with providers to develop detailed clarifications and guidance to avoid unrealistic expectations for residents and excessive reporting requirements. It should also acknowledge that the age of components will remain an important factor for housing associations, both for accounting purposes and in developing planned programmes of work.

Question 15: 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

We support this change, as kitchens and bathrooms are central to residents' safety, comfort, and wellbeing. Recognising them as "key" reflects their importance to daily life.

However, this change will bring a large volume of work forward, shifting these components from long-term lifecycle replacement programmes into more immediate workstreams. The change will likely mean a large volume of work being brought forward in a compressed timeframe, with knock-on effects for delivery of other planned investment.

We recognise that ideally these components should be addressed irrespective of regulatory thresholds. However, over the last decade, a number of external pressures have made this difficult in practice. Members have diverted billions of pounds of investment into addressing building safety issues, particularly fire safety and cladding remediation. This was rightly prioritised, but it inevitably delayed routine replacement programmes. The result is that some providers have a programme of deferred kitchen and bathroom renewals that will now need to be tackled more urgently.

Accounting for these deferred works, the average cost per home for some members could be closer to £11–13k, adding millions per year until 2037 and significantly reducing our capacity to invest in other priorities.

It is therefore essential that the DHS sets practical thresholds for disrepair to ensure that minor issues do not trigger a failure. For example:

- Cupboards and worktops: as long as there is access to functioning cupboard space and worktops, the threshold for disrepair should not be reached. One unusable cupboard or broken door that still allows storage should not constitute disrepair.
- Usability of components: minor issues that limit but do not prevent functionality, such as low water pressure where taps, baths, and showers remain usable, should not meet the disrepair threshold.

We urge the Government to provide clear guidance and sufficient lead-in time for providers to plan and resource these works, taking account of operational and financial implications, and to ensure that implementation is realistic, particularly across large portfolios.

Question 16:

a) Do you agree with the proposed list of building components that must be kept in good repair?

No

b) If you have any views on this specific question you would like to share, please do so here

We support the principle that the building components listed should all be well maintained. However, we do not agree with the proposed list in its current form.

The proposed approach risks becoming overly specialist, duplicating existing mechanical and electrical (M&E) requirements, and extending into areas that are already tightly regulated. Fire safety requirements are already comprehensively covered under the Building Safety Act and Fire Safety Act and have standalone enforcing bodies. Expanded scope could add significant additional reporting requirements without improving outcomes for residents.

We are particularly concerned about the inclusion of lifts as a “key” component that could cause a property to fail the standard. Lifts operate differently to other housing components; they require specialist maintenance, can go in and out of service quickly, and are already comprehensively covered by safety regulations. Furthermore, including lifts in the DHS risks unnecessary duplication of regulatory requirements, adding administrative and compliance burdens without improving resident outcomes. Their inclusion in DHS compliance would create volatility, with homes moving in and out of decency for reasons beyond landlords’ control. A more proportionate approach would be to focus only on instances where lift failures have a clear, practical impact on residents’ ability to access and use their homes. For example, in blocks with more than one lift, the DHS should not class all homes as non-decent if at least one lift remains operational.

Similarly, we do not believe door entry systems should be included as a core building component. We agree these systems should always be maintained, but they are specialist equipment already serviced under existing requirements (by competent contractors), and it would not be appropriate or practical for standard surveyors to assess them as part of DHS inspections. Expecting standard surveyors to assess these systems in detail risks inaccurate reporting and unnecessary duplication.

The proposed scope is also not in line with many tenancy agreements, for instance “internal finishes” during tenancies are the responsibility of the resident.

Expanding the scope of components in this way will also require more frequent and detailed surveys, adding significant cost pressures. Tracking and evidencing compliance across multiple systems could require new dedicated resource, which may divert funding away from direct investment in residents’ homes.

More generally, we’re concerned that expanding the list of components to this extent may make it harder to identify and address the most serious cases of disrepair. We recognise the importance of tackling day-to-day issues that affect residents’ comfort, but it’s vital that any standard enables boards to identify where homes are in greatest need of urgent repair.

Finally, we note the inclusion of internal communal areas and shared outdoor spaces within the proposed list of components. As set out in more detail in our response to Question 18, we do not agree that the DHS should be extended to cover internal

communal spaces or shared outdoor spaces. The DHS should remain focused on the home itself, where it can provide the clearest regulatory baseline and deliver the most direct benefit for residents.

Question 17: Do you agree with the proposed “key” components and “other” components as listed?

No - please see our response to question 16.

In addition, we propose that mechanical ventilation should only be classed as a ‘key’ component where the room it serves has no alternative means of ventilation, such as windows. Where other sources of ventilation exist, the mechanical system should be considered ‘other’. This approach reflects that mechanical ventilation is not always essential to maintain decent levels of air quality and ensures the DHS remains proportionate and practical.

Question 18:

a) Do you agree that the suggested additional components that relate to the public realm (boundary walls, curtilage, pathways and steps, signage, external lighting, bin stores) should only apply to the social rented sector?

No.

b) If you have any views on this specific question you would like to share, please do so here

We do not agree that public realm components should be brought within the standard, or that this requirement should apply only to the social rented sector. Responsibility for these components varies significantly between properties and may be shared between residents, landlords, or managing agents. This is particularly the case in mixed-tenure blocks and estates, where ownership is often unclear. Many of the proposed components, such as gardens and bike sheds, are not core property components, and including them in the DHS would stretch the standard beyond its intended scope. Introducing them into the DHS risks confusion over compliance and accountability.

The DHS was established as a catch-all standard for conditions inside the home, while external areas are already addressed through other regulatory frameworks such as the Housing Health and Safety Rating System (HHSRS) and the Building Safety Act. Expanding the scope would duplicate existing duties without improving outcomes for residents. Many of the proposed components, such as external lighting, boundary walls and communal pathways, are routinely monitored and repaired through estate inspections and day-to-day housing management. For example, if a tripping hazard exists in a shared bike shed, it is unclear how compliance would be reported for each flat, creating practical monitoring challenges.

The impact would also vary significantly between housing types. The practical challenges and costs of managing a block of flats with communal areas and shared outdoor spaces are entirely different to those of a single rented house, yet the DHS framework would apply uniformly. In London especially, with its high concentration of dense, mixed-tenure housing and estate management agreements, these issues would be amplified, making implementation disproportionately difficult and costly.

We also note that private landlords have been exempted from these requirements because of their complexity. Registered providers face the same practical challenges, so applying a higher bar only to the social sector would not be proportionate.

Members are committed to maintaining safe, well-managed estates and already undertake inspections and repairs where required. However, we believe the DHS should remain focused on the condition of the home itself, where its regulatory role is clearest and most effective.

Question 19: If you have any views on these specific questions you would like to share, please do so here

No – please see our response to question 18.

[Proposal 2: Facilities and services \(Criterion C\)](#)

Question 20:

a) Do you agree that under the new DHS landlords should be required to provide at least three out of the four facilities listed?

Yes

b) If you said No, are there any of the facilities that you would prioritise?

Not applicable.

c) Do you believe that the “multiple choice” nature of Criterion C (i.e. landlords must provide at least three out of the four facilities listed) could lead to any practical implications for tenants, landlords and/or organisations responsible for regulating/enforcing the standard?

Yes. The ‘multiple choice’ approach could create significant challenges. This could render thousands of older homes non-decent with no practical way of rectifying them. A large proportion of members have homes that are over 100 years old and would be difficult to bring up to the proposed standard. Structural constraints mean it is not always possible to enlarge or reconfigure these homes, and without flexibility there is a risk that well-maintained, safe properties are deemed non-compliant because they cannot physically meet all the criteria. For example, it would be difficult and costly to add noise insulation to many converted street properties, and they are unlikely to meet

the standard for the size and layout of communal areas. It is important that the standard recognises these limitations and takes a proportionate, context-sensitive approach.

More generally, reasonable expectations also need to be set around landlords' responsibilities for noise insulation. External noise levels are often outside a landlord's control, especially in urban areas like London, and the standard should distinguish between what is reasonably achievable through property improvements, and what is the result of wider environmental factors.

d) If there is anything else you would like to add on this specific proposal, please do so here

We welcome the intention to require the provision of key facilities, but the current drafting risks confusion. Kitchens and bathrooms/WCs are already widely understood as fundamental requirements, reflected in existing legislation and general standards of habitability. The proposed wording, however, could be interpreted as allowing landlords to omit one of these essential facilities if three of the other criteria are met.

We recommend that the Standard make clear that a kitchen and bathroom/WC must always be provided, with the remaining two elements forming the optional components from which at least one must additionally be delivered. This would ensure consistent interpretation and reinforce the principle that all homes should meet basic functional standards as a baseline.

[Proposal 3: Window restrictors \(Criterion C\)](#)

Question 21: Do you currently provide child-resistant window restrictors that can be overridden by an adult on dwellings with windows above ground floor?

Yes, members currently have this in their void standards and part of planned maintenance upgrades. However, that does not mean all homes currently have them. Regardless of whether it has been specifically requested by a resident, we usually try and align installation with wider repairs or works on the home.

Question 22:

a) 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

b) If there is anything else you would like to add on this specific proposal, please do so here

We support the principle of installing window restrictors to reduce the risk of falls and to keep residents, especially children, safe in their homes. However, there are several practical considerations we would like to highlight:

- Window restrictors are not currently part of the standard, and members do not hold comprehensive or up-to-date data on which homes have them, or whether they meet the definition of “child-resistant”. Gathering this information will require significant time and resource.
- Adequate lead-in time is essential. Stock condition surveys run on a rolling cycle, and installation programmes should be aligned with wider planned works to avoid disproportionate disruption and costs.
- It is also unclear whether window restrictors are always effective in practice, given they can often be forced or overridden. Government should consider whether this measure is proportionate, or whether other safety interventions could achieve greater impact.
- Clear guidance on what constitutes a suitable restrictor would be essential. This should include product standards developed with technical experts. Guidance must also clarify that landlords will not be penalised for non-compliance where residents have overridden or removed restrictors.
- In principle, adult overrides should safeguard fire escape routes, but in practice variation in product quality, maintenance, and resident awareness could create risks.
- Many manufacturers specify that restrictors require annual servicing to remain effective. This would represent a significant ongoing and resource-intensive commitment.
- Resident preference must also be considered. In some cases, residents have expressed concerns about restrictors being installed, and this could create challenges around access and compliance. These concerns are likely to increase as climate change leads to hotter summers and higher temperatures in flats, where residents need to keep windows open for ventilation. Balancing safety with liveability will be essential.
- There is a risk of overlapping or conflicting expectations between regulators. The Building Safety Regulator already has oversight of high-rise developments, which are where the risk is most acute. It may be more appropriate for the BSR to oversee this requirement, rather than the Regulator of Social Housing. Clear alignment between regulators will be essential to avoid duplication and confusion.

Regarding costs, the government’s impact assessment assumes around £5 per restrictor, based on large-scale efficiencies and low-cost installation. In practice, our experience shows costs range between £30 and £50.

The cost varies significantly depending on whether restrictors are fitted during window replacement or installed separately. For around 70–90% of homes, compliance will require standalone visits before 2027, making the higher cost scenario more realistic.

If annual servicing were introduced – with checks, minor repairs and system updates – one member estimates that this could add around £100 per property, totalling millions of additional pounds to their annual spend.

Overall, the true cost is likely to be considerably higher than government estimates. Clear guidance, adequate lead-in time and alignment with planned works will be essential to achieve compliance safely and effectively.

[Proposal 4: Home security measures \(Criterion C\)](#)

Question 23: The following questions relate to additional home security requirements in the DHS

a) Do you think that home security requirements in relation to external doors and windows are sufficiently covered in the Decent Homes Standard?

Yes

b) If you responded No to part a), should we consider additional security requirements in relation to external doors and windows in the Decent Homes Standard?

Not applicable.

c) If you responded Yes to part b), should we consider giving landlords the option to comply with Part Q requirements in Building Regulations?

Not applicable.

d) If there is anything else you would like to add about the impact of introducing additional home security measures (such as challenges, costs), please provide detail here

We support secure doors and windows, particularly double locks and chains on external doors, as a proportionate measure with clear safety benefits for residents.

It is essential that these additional measures can be factored into planned programmes of work, so they can be delivered efficiently alongside other scheduled maintenance. We agree with the government's proposal that security requirements should be applied at the point of component replacement or renewal, rather than through retrofitting, which would create substantial additional costs and environmental impact. Furthermore, care must be taken to ensure that implementation does not conflict with ongoing fire safety requirements, particularly for flats where timber fire doors with single-point locking are

often necessary to comply with certification. Fire safety must remain the highest priority.

Based on modelling by one member, the cost of installing double locks and chains is approximately £40 per unit, with a total additional cost of £115,000 a year for the number of homes that would need that work. Although this cost is relatively modest, it is not included in the government's impact assessment, and the practical realities of stock management, procurement, and installation mean additional planning and resources are likely to be required.

Resident preference should also be considered, as there may be issues around access and compliance.

[Proposal 5: Suitable floor coverings \(Criterion C\)](#)

Question 24:

a) 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?

-

b) If you have any views on this specific question you would like to share, please do so here

We support providing suitable floor coverings in all habitable rooms in principle, recognising the benefits for residents, including warmth, reduced noise, improved comfort, and support with cost-of-living pressures. However, making this a statutory requirement for all habitable rooms will be costly.

Modelling by members estimates the cost at upwards of £2,000 per property, which for a large portfolio would add millions to annual expenditure, and substantially exceeds the government's £1,032 per property assumption. Expanding provision to all rooms would also increase the need for tracking, installation, and ongoing maintenance, as well as management of risks such as damage or infestations. It would also add 1–2 days to void turnaround times, with the associated loss of rental income, affecting letting schedules and operational efficiency. Moreover, the government's assumption that only 7% of new lets would require new floor coverings each year is also a significant underestimate. Feedback from members suggests that in practice, floor coverings would need to be installed in the vast majority of homes. This is because existing flooring is often not in adequate condition to be retained. Evidence from individual members suggests that 75-90% of homes may require new flooring at the point of relet.

A more proportionate approach would be a targeted offer of support, for example through welfare funds, furniture packs, or partnerships with local charities. Most members already take this approach, enabling residents in financial hardship to access

support while giving others the flexibility to make their own choices. This approach ensures that funds can continue to be invested in other essential areas, including new supply and core maintenance. Members have not previously judged that providing full floor coverings in all rooms is the most effective use of scarce resources. Instead, funds are prioritised on measures that deliver greater long-term benefit for residents, such as core maintenance, energy efficiency, and new supply.

We also support the principle of a small-scale pilot with social landlords, as suggested by the NHF, to gather evidence on costs, practicalities, and resident benefits before considering a wider implementation is a suitable option to explore.

Questions 25: To help us better assess the impact and know more about the detail of how you currently operate in the relation to providing floor coverings, we are interested in the following:

a) Do you provide floor coverings in any of your dwellings?

Yes

b) If you responded Yes to part a) to providing floor coverings, can you provide details of costs here?

Currently, floor coverings are provided only in kitchens and bathrooms as per the existing DHS. Expanding provision to all habitable rooms at the start of a tenancy would increase costs significantly, with members estimating the total cost for a whole property to be between £1,000 and £3,000, depending on property size and specification.

c) If you responded Yes to part a), in regard to responsibility of repair and maintenance for floor coverings do you: (please select one)

- **Gift flooring to tenants and they are responsible for on-going repair and maintenance** – No.
- **Carry out or have responsibility for repair and maintenance of flooring as part of, for example, tenancy agreements** – Yes, but only in certain tenure types

d) If you answered Yes to part a) to providing floor coverings, in the dwellings you let, which rooms do you currently provide them in? (select all that apply)

- Kitchen
- Bathroom

e) When or if you replace floor coverings in the dwellings you let, do you? (select one)

- **Other (please provide details)**

Some members always replace floor coverings for new tenancies, while others only do this sometimes and choose to clean them if still serviceable.

f) What proportion of your new lettings do you expect would require new floor coverings (including replacements) each year?

- Figures vary across members, with a lower limit of 50% for the majority of members.

g) What proportion of your new lettings do you expect to reuse and clean existing floor coverings (rather than provide new replacements) each year?

- 0% to 25%

h) If floor covering were to form part of the DHS, do you agree with the proposed measurement approach for whether a dwelling passes or fails the suitable floor coverings element of the standard?

Other.

If floor coverings were introduced as a DHS requirement, it is essential that residents retain flexibility to make their homes their own. Housing associations should be able to provide floor coverings as a gift, with ongoing repair and maintenance responsibility transferring to the resident.

Any measurement approach must be developed in close collaboration with social landlords. For example, where suitable floor coverings are provided at relet but removed by residents within the first 12 months, landlords should be considered compliant.

Further clarity would also be required on what constitutes a “suitable” floor covering, taking into account both quality and practicality, and ensuring guidance is proportionate and achievable across the diverse social housing stock.

[Proposal 6: Streamline and update thermal comfort requirements \(Criterion D\)](#)

Question 26:

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

Question 27:

Are there other thermal comfort requirements that you think should be included in the DHS beyond current MEES proposals?

No

Question 28:

If there is anything else you would like to add on this specific topic please do so here

We support the proposed change to require that the primary heating system is sufficient to provide heat to the whole home. Ensuring residents are warm and comfortable throughout their homes is a core element of the standard and aligns with current practice across social housing.

We note that some older properties, rural homes, or homes off the gas grid may require secondary heating to achieve this standard. Flexibility should be provided to accommodate all arrangements where the landlord's heating system can efficiently heat the whole home. This again reinforces why target alignment is so important in allowing us to make the right upgrades in the first instance.

Guidance should be clear that this requirement applies to all types of heating systems, including low-carbon solutions, and should confirm that homes designed to high thermal efficiency standards, such as Passivhaus, are compliant even if they rely on mechanical ventilation with heat recovery.

Further detail should also clarify what constitutes adequate heating for hallways, entrances, and landings, confirming that a single heat source in these areas is sufficient where it ensures acceptable temperatures for residents.

[Proposal 7: Properties should be free from damp and mould \(Criterion E\)](#)

Question 29:

a) 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?

We accept responsibility for identifying and resolving damp and mould issues where they occur. However, we cannot guarantee that properties will remain totally free from damp and mould, as some factors such as overcrowding, fuel poverty, or structural issues, are outside landlords' control.

b) 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?

We agree that preventing damp and mould reaching hazardous levels is essential. However, we do not support introducing a standalone Criterion E in the DHS. Damp and mould are already addressed through HHSRS, Awaab's Law, and existing regulatory requirements. Introducing a separate criterion risks duplication, additional administrative responsibilities, and unrealistic expectations in cases where factors such as overcrowding, underheating, or resident behaviour contribute to damp and mould, which are outside landlords' control.

Question 30: To ensure the standard is met, regulators and enforcers will consider whether the home is free from damp and mould at bands A to H of the HHSRS, excluding only the mildest damp and mould hazards? Do you agree with this approach?

We would recommend a more balanced approach, focusing on Category 1 hazards (Bands A–C) and the higher Bands of Category 2 (D–E), while allowing landlords time to plan remedial work for lower severity cases and acknowledging that small levels of damp and mould, particularly in bathrooms, are within the responsibility of residents to address as part of regular upkeep of their own homes. Although, as set out above, we would argue the requirements of Awaab's Law and other changes within the DHS consultation set sufficient additional requirements for housing associations.

We also note that ongoing work to review HHSRS could provide an opportunity to align the DHS with the revised hazard bands. If alignment were achieved, Criterion E would become unnecessary, reducing confusion and duplication between DHS compliance and HHSRS assessments. This alignment should be a priority for government guidance once the review concludes.

Question 31:

If there is anything else you would like to add on this specific proposal please do so here.

We fully support raising standards to prevent damp and mould, recognising the scale of the problem in London. Recent research by the Centre for London suggests that around a third of Londoners have experienced damp or mould in their homes, highlighting the seriousness of the issue and the need for effective action.

At the same time, we are concerned about the introduction of a separate Criterion E within the Decent Homes Standard. Damp and mould hazards are already captured under HHSRS (Criterion A), and it is not clear how the addition of Criterion E aligns with current HHSRS assessments. This will create duplication, with the possibility that a home could be judged compliant under one criterion but non-compliant under the other, depending on how thresholds are applied. This would be confusing for landlords, regulators, and residents alike.

We do not agree with measuring compliance across bands A–H of HHSRS, as this would capture cases beyond landlords' reasonable control. A more proportionate approach would focus on Category 1 hazards and the higher bands of Category 2, while allowing landlords time to plan remedial work for lower-severity cases. It is important to acknowledge that landlords can take all reasonable and proportionate steps, but cannot prevent all damp and mould from forming.

We also note that under the current proposals, some homes could fail the DHS for damp and mould even if they would not be classified as a disrepair case under HHSRS. Aligning DHS requirements with the forthcoming HHSRS review would ensure that only Category 1 hazards and the higher bands of Category 2 are used to assess decency. This would remove the need for Criterion E and provide clarity on when properties should be considered non-decent, avoiding situations where a home is non-compliant under DHS without being a genuine disrepair case.

Clear guidance on how DHS, HHSRS, and Awaab's Law interact will be essential to ensure consistency and avoid disproportionate reporting requirements, allowing providers to focus resources on the most serious cases. The government should also clarify which works do not need to be treated as significant repairs and are not considered to pose a serious risk to residents, to avoid confusion and ensure consistency in enforcement.

[Section 4 – Application of the DHS to temporary accommodation and supported housing and implications for leasehold and commonhold tenants and landlords](#)

Temporary accommodation

Question 32: Do you agree all other aspects of the DHS in relation to bathrooms and facilities should still apply to temporary accommodation which lacks kitchen and cooking facilities and/or separate bathroom facilities?

Yes.

We agree that temporary accommodation should be kept and maintained in good condition. Living in poor-quality temporary accommodation can have a hugely negative impact on residents. However, given that some temporary accommodation, including those managed by housing associations, provides residents with shared facilities, it is reasonable to exclude the requirement for kitchens and/or separate bathroom facilities in these cases.

Question 33:

a) Are there any other elements of the DHS which have not already been identified which are likely to be challenging to apply to temporary accommodation?

Yes.

b) If answered yes to Q33a), please give details

All points raised in previous sections of this consultation may apply to temporary accommodation. For example, temporary accommodation may experience a higher level of wear and tear because residents move in and out more frequently, meaning components may fall in and out of disrepair more often. It is therefore important that the standard allows landlords reasonable time to complete repairs and improvements.

Question 34:

Do you think the proposed DHS requirements will impact temporary accommodation supply?

Yes.

We are concerned that the proposed DHS requirements could reduce the supply of temporary accommodation, particularly from private landlords who may withdraw from leasing arrangements rather than invest in upgrades.

Supported housing

Question 35:

a) Are there any challenges you foresee in applying the outlined DHS proposals in Supported Housing?

Yes.

b) If you have any views on this specific question you would like to share, please provide details

The day-to-day use of communal spaces in supported housing differs significantly from general needs housing. Shared facilities are often used more intensively and may require additional maintenance or tailored approaches to ensure the DHS proposals are practical and achievable in this context. All points raised elsewhere in this consultation, such as the need for reasonable time to complete repairs, also apply here.

We would also highlight:

- Financial pressures: Supported housing faces acute pressures. Cuts to revenue funding for support services have made many schemes financially fragile, with operating margins significantly below those in general needs. A recent survey found that more than half of supported housing providers expect to close schemes without urgent funding. It is therefore particularly important that the DHS is introduced alongside additional grant funding.

- Window restrictors: In some supported housing schemes regulated by the CQC, there may be requirements for non-overridable restrictors for safety reasons. Government guidance must clarify how to resolve any conflicting regulatory requirements.
- Shared facilities: Some schemes, particularly hostels, do not provide private kitchens or bathrooms. In these cases, a similar enforcement approach as for temporary accommodation would be appropriate.

Leasehold and commonhold

Question 36:

a) Do you agree with the proposed approach to enforcement for rented properties that are leasehold?

Yes

b) Do you see any unintended consequences or risks with this approach, including for resident-owned blocks?

Mixed-tenure blocks present challenges in delivering a consistent programme of works to meet the DHS. Coordination between leaseholders, freeholders, and managing agents can complicate and delay planning, scheduling, and funding. There can also be complexity in determining who is responsible for a DHS failure, depending on lease terms. Accordingly, we would welcome further government guidance, developed with the sector. We also note that more works may fall under Section 20 consultation requirements, creating potential delays.

Question 37:

a) Do you feel that any of the proposed policies create costs for leaseholders (including owner occupiers who live in mixed-tenure buildings) that go beyond what they would expect to cover currently in terms of repair and maintenance liabilities?

Yes

b) If you have any views on this specific question you would like to share, please do so here

Extending the DHS to include outdoor/shared spaces such as pathways, bin stores, and boundary walls could increase costs for leaseholders and resident-owners in mixed-tenure blocks. These costs are likely to be reflected in higher service charges or contributions to major works, which may exceed what they would normally expect to pay for routine repairs and maintenance.

These costs are primarily driven by the additional reporting, coordination, and reactive work required to demonstrate compliance, rather than the works themselves, which we already carry out as part of planned maintenance.

Coordination challenges between freeholders, leaseholders, and managing agents could also lead to delays in planned works, compounding financial and operational pressures. The impact may vary depending on block size, tenure mix, and complexity of management arrangements.

Section 5 – Guidance

Question 38:

a) 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)

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

We would welcome best practice guidance on climate change adaptations, accessibility, and electric vehicle charging, including e-bikes and scooters. Accessibility is where providers face the greatest challenges compared with local authorities, so clear guidance in this area would be particularly valuable.

That said, oversight of our implementation of the standards should be flexible enough to factor in that each organisation works in a slightly different way, with different systems and processes that reflect our unique stock and resident profile. The standard should focus on outcomes rather than prescribing uniform methods, so landlords can deliver the best results of their residents.

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

Not applicable.

Question 39: If you have any other views on this specific topic you would like to share, please do so here

We welcome additional best practice guidance, provided it is clear that this does not imply new statutory duties or responsibilities for social landlords. Guidance should help landlords determine what additional steps they can take to support residents, without creating new compliance requirements.

Two areas where detailed best practice guidance would be particularly beneficial are:

- Adaptations to climate change: Housing associations face a range of climate risks, including overheating and flooding, and often lack the resource to research the full range of possible adaptation measures. Centralised best practice guidance could set out a clear overview of low-cost and scalable measures, explain where they are most appropriate, and signpost to sources of support such as the National Flood Forum. This should cover both technical and behavioural adaptations, for new and existing buildings.
- Accessibility: There is an urgent shortage of accessible homes, with only 9% meeting the basic “visitable” standard. Best practice guidance should share approaches to improving accessibility in existing stock, from small adaptations (such as grab rails, lever taps and door entry systems) to major adaptations funded through Disabled Facilities Grants. Guidance on how to navigate and apply for DFGs would be especially useful.

Finally, we stress the importance of regulatory certainty. Frequent changes to regulations, legislation, or targets make it difficult for housing associations to plan and invest effectively. Clear and consistent guidance is essential to ensure resources are allocated efficiently and homes meet the intended standards.

[Section 6 – Implementing the Decent Homes Standard](#)

Question 40:

a) What do you think the implementation date for the DHS should be in the SRS?
2037

We support 2037 as the realistic and achievable full implementation date. This timeline is necessary to carry out surveys, secure funding and contractors, and plan works strategically across large portfolios. It also provides sufficient time for landlords to align implementation with five-year stock condition survey cycles, adapt data and asset management systems, and spread investment costs over multiple years.

Aligning DHS implementation with MEES deadlines would further support strategic planning, although the current MEES target of 2030 does not align. Supply chain and workforce capacity, particularly the availability of skilled surveyors, retrofit assessors, and contractors, is a limiting factor. Without a realistic date, there is a risk of bottlenecks, escalating costs, and programmes that are more disruptive to residents than necessary. This timeframe would also account for the complexity of older and

taller London housing stock, including flats and buildings with heritage or structural constraints.

b) If Other – What do you think the implementation date should be? (Please select one)

No answer.

Question 41 (All):

a) What do you think the implementation date for the DHS should be in the PRS? (Please select one)

No answer.

b) If Other – What do you think the implementation date should be? (Please select one)

No answer.

Question 42:

a) Do you support phasing in some elements of the new Decent Homes Standard ahead of the proposed full implementation dates (2035/2037)?

No.

We do not advocate for bringing elements forward ahead of the full implementation date.

If the Government were to phase in parts of the DHS, prioritising safety-critical features would be logical. This could include child-resistant window restrictors, essential fire-safety measures, and key interventions to prevent damp and mould. Such an approach would protect residents' safety while giving landlords time to plan, resource, and deliver the full set of requirements effectively.

We do not believe wider phasing is necessary. Mechanisms such as Awaab's Law (from October 2025) and proactive regulation already require urgent risks to be addressed. Phasing would also create inefficiencies by requiring multiple rounds of system changes and adaptations, whereas a single compliance date allows for efficient preparation and minimises disruption for residents.

b) If Yes – Which elements of the new DHS do you think should be introduced ahead of the proposed full implementation dates (2035/2037)?

Not applicable.

Question 43:

Are you confident in your ability to deliver works to meet the updated Decent Homes Standard by the proposed implementation dates (2035/2037)?

- **For Social Housing Landlords only: Within current income forecasts in the SRS?**

Don't know.

We are committed to meeting the updated Standard. However, predicting how we will fund the changes is extremely difficult, given ongoing policy uncertainty that could have a major impact on our underlying finances. Members would need to undertake full stock condition surveys and assess the scope of works required under the updated Decent Homes Standard before we can confirm whether delivery is achievable within current income forecasts.

Most importantly, we need certainty about our long-term rental income. Rent convergence will be critical in restoring our financial capacity and allowing us to invest more in our homes. In our response [to the Government's concurrent consultation on reintroducing rent convergence](#), we said that convergence should be set at £3pw and implemented from April 2026. We need rents to be at the correct level in order to sustainably invest in our homes and meet these new requirements. Please see our response to the Introduction of [Rent Convergence consultation](#) for a more detailed breakdown of existing homes investment and rental income.

Investing in residents' homes is our top priority. We also want to work with the Government to tackle the housing crisis in London by building more new social homes. But these regulatory changes are currently unfunded, and as not-for-profit organisations we can only meet new requirements by making difficult choices about where else to spend. As the Government's impact assessment rightly identifies, this is likely to limit our contribution to new supply.

It is extremely welcome that cladding works funding is now available for homes over 11m. This will make a huge difference for G15 members who are uniquely exposed to the costs associated with building safety.

It remains incredibly costly for us to fund cladding works for homes under 11m. In recent years, we have also absorbed costs for important new standards, including door inspections, installation of carbon monoxide and smoke detectors in 2023, and now EICR regulations for all social homes.

We fully support these standards and have proactively achieved compliance, but all come with costs for which no additional funding is provided.

The first decent homes programme succeeded because it was properly funded: social landlords spent at least £37bn in the first decade, of which £22bn came from

government grant. Given the current financial pressures facing the sector, we urge the Government to consider whether a similar programme is necessary.

Separately, we also recognise that a small number of homes may remain non-compliant for reasons beyond our control, such as:

- structural constraints that limit the works that can be undertaken within the proposed timeframe.
- supply chain constraints affecting the timely delivery of materials.
- contractor availability given the existing shortages of skilled trades and surveyors.
- regulatory overlaps, for example, fire safety requirements, planning or heritage/conservation restrictions that can impact the timing or scope of works.

In addition, there may be cases where resident damage or removal of components (for example, removing handrails or balustrades) could cause a home to be assessed as non-decent. Guidance should clarify that landlords are not penalised for non-compliance in these circumstances, or where tenants refuse access despite all reasonable steps being taken.

b) For all Landlords: Alongside other regulatory requirements including Awaab's Law and MEES?

Alongside other regulatory requirements, including Awaab's Law and MEES, it is important to recognise the significant financial pressures landlords are already managing. Both Awaab's Law and MEES will require substantial investment in inspection, monitoring, and remedial works, as well as major programmes to retrofit homes for energy efficiency. These costs come at the same time as wider building safety requirements and ongoing pressures on planned maintenance budgets.

Based on portfolio size, projected repairs demand, and necessary changes to operational systems, we estimate the cost of meeting Phase 1 of Awaab's Law to be between £1m and £2m per member. The expansive nature of Phases 2 and 3 mean this cost is expected to be even higher.

Reaching the new MEES will be incredibly expensive for providers. For around 80% of our homes, the cost of reaching EPC will be between £6-8k. However, for the remaining 20% of our homes – considered “hard to treat” – upgrading these homes to EPC C costs between £25,000-£35,000 on average. This can rise to as much as £60,000 where external or internal wall insulation is required.

It is therefore essential that the Decent Homes Standard implementation date takes full account of these overlapping demands, to avoid overstretching resources, driving up costs, and ultimately diverting investment away from new supply and other resident priorities.

c) Please give supporting details?

We would need to undertake a full stock condition survey and assess the scope of works required under the updated Decent Homes Standard before we can confirm whether delivery is achievable within current income forecasts.

Question 44: Considering the need to meet both Minimum Energy Efficiency Standards and the Decent Homes Standard, do you plan to deliver savings by:

a) Prioritising measures which will both improve a property's energy efficiency and help meet the DHS?

Yes.

b) Reducing overhead costs by programming combined works to meet both standards?

Yes.

Aligning DHS and MEES deadlines at 2037 would allow landlords to sequence retrofit programmes efficiently, reduce disruption for residents, and make best use of limited sector capacity. Without alignment, there is a high risk of cost inflation, duplicated works, and resident dissatisfaction. This is particularly important for older and taller buildings in London, and for flats, where sequencing works reduces bottlenecks and minimises disruption for residents.

We already try to coordinate our considerable building safety programmes, maintenance, and planned investment to deliver multiple interventions simultaneously wherever possible. Leaseholder consultation and approvals can, however, limit the speed and scope of works in certain blocks, and this needs to be factored into planning.

c) Please give supporting details

Members would need to undertake further analysis across our homes to identify where combined works are feasible and cost-effective.

We do know that prioritising interventions that deliver both energy efficiency improvements and decency upgrades will allow us to maximise value and minimise disruption for residents. Our programmes already integrate building safety works, energy efficiency retrofits, and decency upgrades wherever possible, reflecting our focus on strategic and efficient investment. Failure to secure additional funding or to sequence works efficiently could directly constrain our ability to deliver new social homes alongside these essential upgrades.

This is why we believe compliance targets for both standards should be aligned and implemented by 2037. Aligning the DHS and MEES deadlines would enable landlords to

sequence retrofit programmes efficiently, optimise resources, and reduce the risk of bottlenecks or escalating costs.

This timeframe also reflects sector capacity and skills shortages and would allow landlords to carry out surveys, secure funding and contractors, and plan works strategically across large portfolios.

Question 45: Will achieving the updated Decent Homes Standard by the proposed implementation dates (2035/2037) only be achievable by reducing discretionary spending compared to your current plans? (Select one)

a)

Other

b) Please providing supporting detail

Most of our expenditure is directed towards essential services and investments that directly benefit residents, such as maintenance, repairs, tenant support services (for example, employment training and financial advice), as well as building new social homes. All of these are important in the context of the multiple housing crises faced by Londoners.

If not funded by the Government, meeting the updated Decent Homes Standard within the proposed timeline will therefore mean diverting resources from elsewhere. Without additional funding, investment may need to be diverted from building new social homes, as acknowledged by the Government's impact assessment.

Question 46 (For PRS landlords and tenants):

a) Do you agree that only criterion A should be a Type 1 DHS requirement?

Not applicable

b) If No – which other criteria do you think should be a Type 1 DHS requirement?

Not applicable.

c) Please give supporting details

Not applicable.

Question 47: (For All)

If there is anything else you would like to add on this specific section? If so, please do so here

We advocate for a 2037 implementation date. Across the G15, we have a portfolio of over 880,000 homes, and this is the only deadline that provides landlords with the necessary time to prepare. We need to undertake stock surveys, arrange strategic

programmes of work and allocate budget correctly. This timeline also aligns with the precedent set during the introduction of the first DHS.

It is also important to consider the wider impact on the housing sector. A shorter timeline could create a surge in demand for contractors and skilled workers, likely driving up costs and creating bottlenecks that could affect delivery.

Social Rented Sector

Question 48:

a) Do you agree that providers should be given flexibility from meeting the DHS where tenants refuse access?

Yes

b) Do you agree that there should be additional guidance issued by the government to provide more detail on tenant refusals?

Yes

c) Do you agree that providers should be given flexibility from meeting the DHS where there are physical or planning factors preventing compliance?

Yes

d) Do you agree that providers should be given flexibility from meeting the DHS for non-compliance due to sale, demolition, or planned regeneration of properties?

Yes

e) If there is anything else you would like to add on this specific question please do so here.

Successful implementation of the Decent Homes Standard will require a robust and responsive supply chain. At present, the capacity across contractors, specialist trades, and materials is limited. Without investment and development in the supply chain, meeting the proposed timeline, especially for large-scale programmes in London, will be extremely challenging.

Tenant refusals and issues of no access can make it harder to carry out essential work, and our current DHS compliance data shows that access issues are a common reason why some homes are not updated as quickly as we would like. Guidance should set out the steps landlords must take to gain resident approval before a refusal can be recorded, ensuring reasonable efforts are documented. Clear guidance and flexibility from the Government will help ensure that all homes are brought up to standard safely, without unnecessary delays.

We also note that higher levels of exemptions are likely under the revised standard, particularly where physical or planning constraints make works unviable or disproportionately disruptive. Exemptions should also explicitly cover Category 1 hazards where addressing them would cause significant expense or disruption, and where works are beyond the landlord's reasonable control. Guidance must set clear expectations for how exemptions should be applied, to provide consistency across the sector.

Private Rented Sector

Question 49:

a) Do you agree that statutory enforcement guidance should specify that local authorities should exercise discretion on enforcement when physical or planning factors prevent compliance with a DHS requirement?

Not applicable.

b) Should statutory enforcement guidance specify that local authorities exercise discretion on enforcement in situations of tenant refusal?

Not applicable.

c) If there is anything else you would like to add on this specific question please do so here.

No answer.