

Consultation on revised Decent Homes Standard: September 2025

Response from Highbury Group on Housing Delivery

Support for the principle of a unified standard: We support the government's goal of creating a single, universal standard for both the social and private rented sectors. All tenants deserve a safe and decent home to live in.. The proposed new standard is a considerable improvement on the existing (2001/06 based) standard.

There is no reason why the standards set should be different for different tenures. The introduction of a standard for PRS is welcome in this respect. The move to the concept of a reasonable condition for kitchens, bathrooms and windows is welcome. The current DHS criteria of age of these elements, whilst initially useful (and easily measurable) in the SRS stock is now no longer appropriate, and in some cases led to unnecessary expenditure. It is condition and functionality that matter most.

Timeline, implementation and funding: We have concerns about the process and cost of implementing the revised Decent Homes Standard in both the social and private rented sectors.

The cost of implementation will fall most heavily on those landlords with the poorest quality stock. All landlords must also cope with the implementation of EPC C (or its equivalent) by 2030 and social sector landlords must implement Awaab's Law by 2027. This is a lot of change for landlords to absorb and it is not clear from the impact assessment whether the relevant works are best all carried out at one time to minimise voids and disruption to tenants or should take place in stages over time as the proposed 2035/37 implementation deadline would suggest.

An implementation date of 2035 or 2037 will be bad news for tenants and will delay the wider societal benefits which the proposed reforms will bring. The argument that a 10-year lead in period is required because this was the lead in period for implementation of the 2001/2006 Decent Homes Standard is not supported by evidence as to why such a long lead in period is required.

The impact assessment is very limited and does not consider either the costs and benefits of the targeted approach vs the preferred approach or the potential impact of implementation at an earlier date (say 2030) compared with the two options modelled – 2035 and 2037.

Other possible options could include:

- Immediate implementation of the targeted approach followed by full implementation of the preferred option in 2035 or 2037
- Implementation of the preferred approach with regard to new tenancies either immediately or in line with proposed changes to EPC/energy standards with full implementation for all properties by either 2035 or 2037.

There is the possibility that the most affected private landlords, those with the poorest quality housing, might exit the market. Overall we would welcome this outcome as such properties could be sold to parties prepared to carry out the necessary improvement works – such as owner occupiers, social landlords or other private landlords.

Enforcement and resourcing for local authorities: To ensure the new standards are followed effective and properly resourced enforcement is required.

The new standards will only be effective in the PRS if local authorities have the funding and powers to enforce them. The consultation proposes new enforcement powers for local authorities, including the ability to levy fines of up to £40,000 for non-compliance, but we are still concerned about whether councils would have the capacity and skills to use these powers effectively. Additional training will be required for Environmental Health Officers and other enforcement officers and potentially additional recruitment by local authorities.

In the social housing sector the Regulator of Social Housing (RSH) must be resourced adequately to judge if social landlords are meeting the updated decent homes standard.

The proposals will rely on the judgement of those involved, and in particular of Environmental Health Officers and potentially Building Surveyors or members of the Chartered Association of Building Engineers. Judgement is always subjective and thus open to challenge. In practice it is to be expected that breaches of the proposed standards will concentrate on elements that are clearly unacceptable. But this does not sit easily with a rulebook, and possible legal actions which will be determined by the written code of the regulations. It is essential that the process of regulation is undertaken by professionals who can make a realistic assessment of repair condition and functionality and that their judgements must take precedence over a legalistic interpretation of a code.

Whilst SRS landlords are already regulated, the proposal effectively means that PRS landlords can be prosecuted and therefore the standard of assessment, when it gets to legal action, needs to be of the highest quality, independent of the landlord and of the tenant (and their advisors and supporters), and Inspectors need to be able to make judgements about degree of default rather than just tick a box.

The wording of the proposals leaves little room for judgement – the fact that nearly every building element and service is described as “key” shows little regard for the judgement needed. There needs to be a mechanism for balancing the judgement between one unacceptable major defect and an unacceptable number of minor defects. It is possible to envisage a single but minor defect under each of the 11 key components passing the test as proposed but adding up to an unacceptable dwelling.

Detailed points

Window opening restrictors (Proposal 3)

A careful balance is needed here with the need for windows to be capable of opening fully; to be easily cleaned both sides; and to be a means of escape. Current models of lockable restrictors often fail through flimsy design or loss of keys. They often discourage ventilation when most needed. Some common window types, such as double hung vertical sashes, are not amenable to restrictors that can be quickly and easily removed.

Floor coverings (Proposal 5)

It seems absurd that at present private landlords routinely provide floor coverings but social landlords (whose tenants are generally poorer) do not do so. In 2024 the Welsh Government required all social landlords to provide floor coverings at change of tenancy¹ subject to listed exceptions including excessive costs or where the item is not applicable. This policy change appears to be working smoothly. It is not clear why social rented tenants in England should have to wait 10 years for a service which is already available to social rented tenants in Wales and is generally offered to private rental tenants across all UK jurisdictions

Looking at the proposals in more detail:

Laminated floor coverings are popular and effective especially with a sound-deadening underlayer; but they are deemed unacceptable in the proposals.

There is a strong argument that floor coverings (over subfloors) in living rooms, bedrooms, and stairs/hallways/landings should be treated the same as furnishings (with a higher rent or service charge than in an unfurnished dwelling). Floor coverings to bathrooms and kitchens, and other wet areas, are already commonly held to be the responsibility of the landlord to provide (subject to tenancy agreements or lease terms).

The Highbury Group estimates that the cost for reasonable quality carpeting or laminating to the “dry” living areas could be as follows:

Floor covering costs at current prices including volume discounts and VAT

Item		One bed	Two bed	Three bed
Floor area	m ²	50	70	90
“Dry” area	m ²	34	45	67
Primary covering	£psm	25	25	25
Underlay	£psm	5	5	5

¹ Para 6b Welsh Housing Quality Standard 2023 (April 2024). <https://www.gov.wales/welsh-housing-quality-standard-2023-0>

Fitting cost	£psm	5	5	5
Skirting junction	m	46	59	91
Skirting treatment	£psm	1	1	1
Door thresholds	# £p each	5	7	9
Door thresholds	20	20	20	
Removal of old	£	100	125	150
Primary covering	£	846	1,126	1,666
Underlay	£	169	225	333
Fitting cost	£	169	225	333
Skirting treatment	£	46	59	91
Thresholds	£	100	140	180
Total	£	1,431	1,901	2,754

Assumed life	Years	8	7	6
Annual cost rounded	£pa	180	270	460
Weekly cost rounded	£pa	3.40	5.20	8.80

Similar research by Altair [Final-Report-Longleigh-Flooring-v2.pdf](#) found that If social landlords were to provide floor coverings at point of let, this would cost £2.85 per week for a flat and £3.50 per week for a house. This research is written from the perspective of grants from some charities to some tenants who cannot afford floor coverings and may underestimate landlord's costs however it confirms that the cost of floor coverings is not excessive

Thermal Comfort (Proposal 6)

We welcome and recognise recent consultations to reform the existing EPC methodology and explore the creation of a new energy efficiency metric to sit alongside EPCs; however, when implemented, we recommend the final metrics are reviewed for a period of two years. This would ensure any unintended consequences are tackled or countered with exemptions.

As an example of an unintended consequence, SAP 10.2 underpins the updated Part L 2021 (Conservation of fuel and power) building regulations but is returning EPC C ratings for buildings that are more energy efficient and emit 30% (minimum) less CO2 than homes built to the previous standard. Yet those older homes have comfortably achieved EPC B and higher due to the methodology used in previous SAPs, particularly the lower energy cost baseline.

Consequently, the most energy efficient new build homes are being excluded from 'Green Mortgages', and in some cases facing penalties from councils who require higher EPC standards.

The Home Energy Model (HEM), which replaces SAP, may fix this but these outcomes are yet to be proved and due to teething issues with HEM, SAP is expected to remain in place for some time.

Although existing homes use RdSAP, an older and reduced calculation methodology, an update is expected and RdHEM likely replacing it. However, this may take years, and the above example highlights the potential for unintended consequences to impact millions of existing homes (16.5million built before national Building Regulation), particularly if councils continue setting their own local minimum EPC standards for rental properties, vary calculation methodologies (as has been seen in new build), or regulations change so that EPCs last three years, and not 10 years as is currently the case.

Damp and mould (Proposal 7)

The immediate landlord should be responsible for providing a dwelling that can minimise water penetration and condensation in normal use, and if provided satisfactorily should not be responsible for any consequent damp or mould. Consideration needs to be given to the lifestyle of tenants and how this interacts with landlord responsibilities.

Note: The Highbury Group on Housing Delivery comprises an independent group of specialists from the public, private and independent sectors with a membership drawn from housing, planning and related professions; it offers advice and makes representations to Government and other agencies on a variety of subjects, with the aim of maintaining and increasing the output of housing, including high quality affordable housing. The views and recommendations of the Highbury Group as set out in this and other papers are ones reached collectively through debate and reflect the balance of member views. They do not necessarily represent those of all individual members or of their employer organisations. The group's core membership and previous statements and research presentations are on the group's website:

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