

ESC Response:

Reformed Decent Homes Standard for Social and Privately Rented Homes

Closing Date: 10th September 2025

Further details and information: [Consultation on a reformed Decent Homes Standard for social and privately rented homes - GOV.UK](#)

Consultation Questions:
1. 1– 10. Demography Questions
Question 11: Do you agree that age should be removed from the definition of disrepair? Yes/No/Don't know
Don't know. This makes stock investment/planned capital programmes difficult to manage as you need to work from an expected lifetime of a component when producing the programmes. If you move to purely condition, then you may replace more components based on how a tenant has treated it I.E if they do not look after it, they get a newer kitchen sooner than somebody else who has. Also, we'd need a methodology for replacement programmes, such as anything that has been flagged as 'fair or worse' condition through stock condition surveys goes into a 5-year programme for replacement potentially, as we would no longer have age as a guiding factor. For privately rented homes the lack of an age criteria is helpful as often the install date is unknown, and the condition of the element is the important factor.
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/No/Don't know
Yes
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? Yes/No/Don't know
Yes.
Question 14 (Landlords only): 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/No/Don't know/Not applicable
Yes.
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/No/Don't know
Yes.
Question 16: a) Do you agree with the proposed list of building components that must be kept in good repair? Yes/No/Don't know
Yes.
Question 17: Do you agree with the proposed "key" components and "other" components as listed? Yes/No/Don't Know
Yes.
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? Yes/No/Don't know
No.
b) If you have any views on this specific question you would like to share, please do so here Open text
Private rented sector also has these things, so why should they not also have to keep these areas maintained to a standard.
Question 19: If you have any views on these specific questions you would like to share, please do so here Open text
Nothing to add.

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/No/Don't know. If responded No, please provide supporting details

Yes.

b) If you said No, are there any of the facilities that you would prioritise? (Please select all that apply) Kitchens / Bathrooms / Noise Insulation / Communal Areas

N/A.

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/No/Don't know If you responded Yes, please provide supporting details.

It must be capable of being evidenced as to which three have been provided, if all four have not, as well as reasoning as to why the fourth cannot be provided/work planned to provide it.

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

Open text

N/A.

Question 21 (Landlord only):

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

All/some/none/don't know/not applicable (select one please)

Some.

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/No/Don't know

Yes.

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

Open text
Nothing to add.
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/No/Don't know
No.
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? Yes/No/Don't know
Yes.
c) If you responded Yes to part b), should we consider giving landlords the option to comply with Part Q requirements in Building Regulations? Yes/No/Don't Know
Yes.
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 Open text
Nothing to add.
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? Yes/No/Don't know
Yes.
b) If you have any views on this specific question you would like to share, please do so here Open text
Costs need to be considered in the implementation of this. Can it be covered by increasing rent charges/an eligible service charge?

For the avoidance of doubt guidance should make it clear that these must be in good condition not new to avoid perfectly good covering being removed at a significant environmental cost.

Questions 25 (Landlords only):

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/No/Don't know/Not applicable

No.

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

N/A.

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
- Carry out or have responsibility for repair and maintenance of flooring as part of, for example, tenancy agreements
- Other (please provide details)
- Not applicable

N/A.

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)

- All rooms
- Bedrooms
- Living room
- Kitchen
- Bathroom
- Other areas (including stairs, hallways)
- Varies by property
- Other e.g. new builds (please provide details)
- Not applicable

N/A.

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

- Always replace floor coverings for new tenancies
- Sometimes replace floor coverings for new tenancies

- Only replace floor coverings if tenants request it
- Allow tenants to replace floor coverings themselves
- Provide support for tenants to replace floor coverings themselves
- Never replace floor coverings
- Other (please provide details)
- Not applicable

N/A.

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

- 0% to 25%
- 26% to 50%
- 51% to 75%
- 76% to 100%
- Not applicable

76% to 100%.

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%
- 26% to 50%
- 51% to 75%
- 76% to 100%
- Not applicable

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?

Yes/No/Don't know/Other (please provide details)/Not applicable

Other- if the landlord can evidence the flooring was present at the point of letting to the new tenant, and the tenant subsequently removes the flooring (to put their own in or other), will this be a failure under DHS? What expectation will there be on the landlord to enforce flooring with a tenant if they refuse permission to install/replace/repair?

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/No/Don't Know

Yes.

Question 27:

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

Yes/No/Don't Know

No.

Question 28:

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

Open text

N/A.

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?

Yes/No/Don't Know

Yes.

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?

Yes/No/Don't Know

Yes.

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?

Yes/No/Don't Know

Yes.

Question 31:

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

Open text

N/A.

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/No/Don't know/Not applicable

Yes

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/No/Don't Know/Not applicable

No.

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

Open Text

N/A.

Question 34:

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

Yes/No/Don't Know / Other (please specify)/Not applicable

Yes.

Question 35:

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

Yes/No/Don't Know/Not applicable

Yes

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

Open text

Many supported housing providers provide accommodation that is in significant state of disrepair (Cat 1 and Cat 2 hazards) or simply relies on other landlords to fund the costs associated with property repairs and maintenance. This can in some cases create delays and compliance issues. Some of the works required are indeed programmable, our experience is that scheduled works in some instances are overlooked.

Question 36:

a) Do you agree with the proposed approach to enforcement for rented properties that are leasehold? Yes/No/Don't Know/Not applicable
Yes
b) Do you see any unintended consequences or risks with this approach, including for resident-owned blocks? Open text
Yes
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/No/Don't Know/Not applicable
Don't know.
b) If you have any views on this specific question you would like to share, please do so here Open text
N/A.
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) Please select what you would like to include: • Accessibility • Additional home security measures e.g. external lighting and CCTV • Adaptations to climate change • Digital connectivity • Electrical Vehicle Charging • Furniture provision • Water efficiency measures • Other
Accessibility Additional home security measures e.g. external lighting and CCTV Adaptations to climate change Digital connectivity Electrical Vehicle Charging Furniture provision

Water efficiency measures.
b) If you have selected 'Other', please say what you would like to be included
N/A.
Question 39: If you have any other views on this specific topic you would like to share, please do so here Open text
N/A.
Question 40 (All): a) What do you think the implementation date for the DHS should be in the SRS? 2035 / 2037 / Other (Please select one)
2035.
b) If Other – What do you think the implementation date should be? (Please select one) 2027 / 2028 / 2029 / 2030 / 2031 / 2032 / 2033 / 2034 / 2036 / Later/Don't know
N/A.
Question 41 (All): a) What do you think the implementation date for the DHS should be in the PRS? (Please select one) 2035 / 2037 / Other
2035.
b) If Other – What do you think the implementation date should be? (Please select one) 2027 / 2028 / 2029 / 2030 / 2031 / 2032 / 2033 / 2034 / 2036 / Later/Don't know
N/A.
Question 42 (All): a) Do you support phasing in some elements of the new Decent Homes Standard ahead of the proposed full implementation dates (2035/2037)? Yes / No / Don't Know
No. But a transition period should be allowed for.
b) If Yes – Which elements of the new DHS do you think should be introduced ahead of the proposed full implementation dates (2035/2037)?

Open Text
N/A.
Question 43 (For SRS and PRS landlords only): Are you confident in your ability to deliver works to meet the updated Decent Homes Standard by the proposed implementation dates (2035/2037)? a) For Social Housing Landlords only: Within current income forecasts in the SRS? Yes/No/Don't Know/Not applicable
Yes.
b) For all Landlords: Alongside other regulatory requirements including Awaab's Law and MEES? Yes/No/Don't Know/Not applicable
Yes.
c) Please give supporting details?
But allow a transition period too.
Question 44 (For SRS and PRS landlords only): 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/No/Don't Know/Not applicable
Yes.
b) Reducing overhead costs by programming combined works to meet both standards? Yes/No/Don't Know/Not applicable
Yes.
c) Please give supporting details Open text
This is a sensible approach but will require resourcing appropriately to ensure it is delivered in this way.
Question 45 (SRS landlords only)

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) Yes/No/Partly/Other/Not applicable

b) Please providing supporting detail

Other- too early to say at this stage, but it is likely given the pressure on the HRA.

Question 46 (For PRS landlords and tenants):

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

Yes/No/Don't Know/Not applicable (Select one)

N/A.

b) If No – which other criteria do you think should be a Type 1 DHS requirement? Criterion B / Criterion C / Criterion D / Criterion E/ Other/ Not applicable (Select all that apply)

N/A.

c) Please give supporting details

Open text

N/A.

Question 47: (For All)

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

Open Text

Nothing further to add.

Social Rented Sector

Question 48:

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

Yes/No/Don't Know/Not applicable

Yes.

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

Yes/No/Don't Know/Not applicable

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/No/Don't Know/Not applicable

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/No/Don't Know/Not applicable

Yes.

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

N/A.

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?
Yes/No/Don't know/not applicable

Yes

b) Should statutory enforcement guidance specify that local authorities exercise discretion on enforcement in situations of tenant refusal?
Yes/No/Don't Know/not applicable

Don't know

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

There are situations where the Decent Homes failure could represent a serious risk to the safety of the tenant and no discretion should apply in these cases. In more minor situations a discretion on enforcement would be appropriate