

# Response ID ANON-EU5B-W7MT-Z

Submitted to A Reformed Decent Homes Standard for Social and Privately Rented Homes Consultation  
Submitted on 2025-09-10 19:53:16

## Ministerial Foreword

## Demography Questions

1 What is your name?

Name:  
Julie Godefroy

2 What is your email address?

Email:  
jgodefroy@cibse.org

3 What is the name of your organisation, if applicable?

Organisation name :  
CIBSE - Chartered Institution of Building Services Engineers

4 What position do you hold in the organisation, if applicable?

Position in the organisation :  
Head of Net Zero

5 In which capacity are you completing these questions, Select all that apply?

Other (please specify) [free text]

If you responded as Other, please give details here :  
Professional Institution

6 If you are responding as an individual, where do you live? (Select one)

Not applicable

If you selected Other, please give details here :

7 Landlords and estate/letting agents only: Where are the majority of properties you let located? (Select one)

Not applicable

If you selected Other, please give details here :

8 Landlords only: How many rental properties do you own or manage (select one)?

Not applicable

9 Landlords only: Which of these options best reflects how you would describe yourself or organisation (Select one)?

Not applicable

Landlords only, if you responded as Other, please provide details here :

10 Landlord only: Do you provide supported housing?

Not applicable

11 Landlord only: Do you provide temporary accommodation?

Not applicable

12 Tenant only: Is anyone living in your property under the age of 5?

Not applicable

13 Tenant only: Is anyone living in your property over the age of 65?

Not applicable

14 Tenant only: Do you live in a House in Multiple Occupation (HMO)? An HMO is a privately rented house or flat occupied by at least three tenants from two or more families who share facilities, e.g. lavatories, kitchens, bathrooms.

Not applicable

## Executive Summary

### Introduction

### Section 1: Policy Context and Background

### Section 2: The Decent Homes Standard Review

### Section 3: Proposed changes to the DHS

#### Proposal 1: Updating the definition of disrepair (criterion b)

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

Yes

16 Do you agree that the thresholds used to define disrepair for each component should be updated to reflect a more descriptive measure as proposed?

Yes

17 Do you agree that the number of items or components which must require major repairs for the component to be considered in disrepair should be reduced?

Not Answered

18 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?

Not Answered

19 Do you agree that kitchens and bathroom components should be considered as “key” i.e. one or more in disrepair would cause a property to fail the DHS?

Not Answered

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

Not Answered

Do you have any further views on proposed list of building components that must be kept in good repair :

21 Do you agree with the proposed “key” components and “other” components as listed?

Not Answered

22 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?

Not Answered

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

Proposal 1 questions, if any further views please give details here :

CIBSE support the addition of mechanical ventilation systems to Table 4a. We however recommend:

- that this should include all ventilation systems e.g. the current wording could imply only centralised mechanical ventilation units, but the requirements should include all systems, such as localised extract fans.

- The definitions provided represent extreme examples of systems not working. The systems may well be switching on but not work appropriately, providing insufficient ventilation, and this may not be obvious to tenants. We recommend that systems should be kept in a good state of maintenance,

not only a good state of repair. The update to the DHS is an important opportunity to address this, as the first generation of residential mechanical ventilation systems, installed around a decade ago, is coming to its end of life and may still be unfamiliar to landlord and maintenance teams. Furthermore, the standard should ensure that adequate ventilation is provided (not just that ventilation systems are in a good state where they are already present). This should contribute to reducing the risk of damp and mould, but will also contribute to broader air quality, and possibly summer thermal comfort.

Similarly, we recommend that more attention is given to standards applied for electrical systems: the proposals for domestic electrical safety have risen in the last 20 years and now include proposals for the provision of residual current devices (including Type A devices no longer seen as adequate), fire resistant consumer units, more socket-outlets, better lighting, improved fire detection and alarms, etc. The current proposals are unlikely to ensure this. We would welcome engagement with the CIBSE Electrical Services group, which could provide more information and more detailed recommendations.

## Proposal 2: Facilities and Services (criterion c)

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

Not Answered

Not Answered

If you responded Yes, please provide supporting detail here :

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

We recommend that the list of standard facilities should also include means to dry clothing in ways which reduce the risk of condensation / mould.

## Proposal 3: Window restrictors (criterion c)

25 LANDLORDS ONLY: Do you currently provide child-resistant window restrictors that can be overridden by an adult on dwellings with windows above ground floor? (Select one)

Not Answered

26 Do you agree with the proposal that all rented properties must provide child-resistant window restrictors that can be overridden by an adult on all windows which present a fall risk for children (as defined above including a recommended guarding height of 1100mm)?

Don't know

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

We agree there should be a requirement for window safety. However, we would highlight the following:

- the need to avoid increasing overheating risk if restrictors are not well thought-through and excessively restrict air flow, and
- the opportunity, through measures that improve window safety, to also improve ventilation and/or reduce overheating risk e.g. if these measures also allow secure openings (i.e. against external intrusion), and/or provide shading.

## Proposal 4: Home Security Measures (criterion c)

27 The following questions relate to additional home security requirements in the DHS. Part a) Do you think that home security requirements in relation to external doors and windows are sufficiently covered in the Decent Homes Standard?

Not Answered

Not Answered

Not Answered

Part 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 :

## Proposal 5: Suitable floor coverings (criterion c)

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

Not Answered

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

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

Not Answered

Part b) please provide details of costs here :

Not Answered

Part d), if you responded Other, please provide detail here :

Not Answered

Part e) If you responded Other, please provide detail here :

Not Answered

Not Answered

Not Answered

Part h) If you responded Other, please provide detail here :

### Proposal 6: Streamline and update thermal comfort requirements (criterion d)

30 Do you agree with the proposal that the primary heating system must have a distribution system sufficient to provide heat to the whole home?

Yes

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

Yes

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

Proposal 6, any further views to add, please do so here :

CIBSE are in support of the general direction i.e. that the social rented sector would now be subject to MEES; the current requirement (EPC F!) is wholly inadequate to reduce fuel poverty and provide healthy and comfortable homes.

We agree that the fabric criterion should be used (out of the several proposed new EPC metrics), to reduce fuel poverty risk. In the detail, CIBSE's support to applying MEES in the social rented sector is conditional to our points made in the EPC consultation, including the fact that the proposed fabric metric, FEES, is highly theoretical and not measurable: we recommend alternative metrics should be used to effectively drive fabric performance [<https://www.cibse.org/media/fpccuuez/reforms-to-the-epbr-cibse-response-rev1-submitted.pdf> ].

We would also point to the work of the National Retrofit Hub on MEES and how they could deliver health, fuel poverty and comfort outcomes [<https://nationalretrofitHub.org.uk/resource/delivering-for-tenants-what-is-needed-from-the-minimum-energy-efficiency-standards-to-deliver-the-health-fuel-poverty-outcomes> ]. In particular, we support their points to CIBSE's on the need for ambition and monitoring outcomes.

Furthermore, and beyond energy performance, we strongly recommend to review the reliance on the HHSRS to limit overheating risk, and the option to strengthen DHS requirements. As pointed out by MHCLG themselves in relation to damp and mould, the HHSRS is a backstop when things go wrong, but prevention and mitigation measures should be considered instead, especially passive ones which provide resilience and do not create a risk of increased energy costs. This is particularly important given evidence that overheating is more prevalent in households living in social housing, with low incomes or with members aged over state pension age [K.J. Lomas, S. Watson, D. Allinson, A. Fateh, A. Beaumont, J. Allen, H. Foster, H. Garrett, Dwelling and household characteristics' influence on reported and measured summertime overheating: A glimpse of a mild climate in the 2050's, Building and Environment, Volume 201,2021, 107986, ISSN 0360-1323,<https://doi.org/10.1016/j.buildenv.2021.107986>. ].

### Proposal 7: Properties should be free from damp and mould (criterion e)

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

Yes

Yes

34 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?

Don't know

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

Proposal 7: new damp and mould criterion e), please add further views here :

We recommend that the requirements be reworded to place more emphasis on damp and mould risk.

The HHSRS has not been updated for a long time, and we understand from the consultation that “any changes to the HHSRS following the review, if brought forward, would focus on making the tool more intuitive to use. The review’s recommendations would not change landlords’ responsibilities under criterion A of the DHS”. We recommend that more information is provided to ensure that the bands A to H of the HHSRS are based on the latest evidence.

We would also recommend liaising with the UK Centre for Moisture in Buildings, for the latest evidence and information on assessment techniques.

#### Section 4: Application of the DHS to temporary accommodation and supported housing and implications for leasehold and commonhold tenants and landlords

36 This question relates to Temporary Accommodation: 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?

Not Answered

37 This question relates to Temporary Accommodation: 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?

Not Answered

If you responded Yes, please provide detail here :

38 This question relates to Temporary Accommodation: Do you think the proposed DHS requirements will impact temporary accommodation supply?

Not Answered

If you responded as Other, please give details here :

39 This question relates to Supported Housing: Are there any challenges you foresee in applying the outlined DHS proposals in Supported Housing?

Not Answered

If you have any further views on Supporting Housing question, please provide here :

40 This question relates to Leasehold and Commonhold: Do you agree with the proposed approach to enforcement for rented properties that are leasehold?

Not Answered

Do you see any unintended consequences or risks with this approach, including for resident-owned blocks? Please provide details here :

41 This question relates to Leasehold and Commonhold: 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?

Not Answered

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

#### Section 5: Guidance

42 What information and/or topics would you like included in the proposed additional best practice guidance for social and private landlords and tenants (please select all that apply)

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

If you responded Other, please provide more details here :

- Guidance on mechanical ventilation and electrical systems: see Q19.
- Guidance on heat pumps, since these will be unfamiliar to most tenants and will benefit from different operating regimes to ensure that tenants can take the comfort benefits without excessive running costs.

43 If you have any other views on this specific topic you would like to share, please provide details here

Best practice guidance, if you other views on this specific topic, please share here :

## Section 6: Implementing the Decent Homes Standard

44 What do you think the implementation date for the DHS should be in the Social Housing Sector? (Select one)

Not Answered

Not Answered

45 What do you think the implementation date for the DHS should be in the Privately Rented Sector? (Select one)

Not Answered

Not Answered

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

Not Answered

If responded Yes, which elements of the new DHS do you think should be introduced ahead of the proposed full implementation dates (2035/2037)?  
Please give provide details here :

47 LANDLORD ONLY QUESTION: this question is in three parts. Part a) is for Social Housing Landlords only and part b) and c) are for All Landlords to respond

Not Answered

Not Answered

Please provide supporting details here :

48 LANDLORDS ONLY: Considering the need to meet both Minimum Energy Efficiency Standards and the Decent Homes Standard, do you plan to deliver savings by prioritising measures which will both improve a property's energy efficiency and help meet the DHS?

Not Answered

Not Answered

Please provide supporting details for your responses here :

49 SOCIAL HOUSING 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? (Please select one)

Not Answered

Please provide supporting detail for your responses here :

50 FOR PRIVATE RENTED LANDLORDS AND TENANTS ONLY: Do you agree that only criterion A should be a Type 1 DHS requirement?

Not Answered

Please give supporting details for your responses here :

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

Anything further to add on Section 6 please provide here :

## Section 7: Meeting the Standard

52 THESE QUESTIONS RELATE TO THE SOCIAL RENTED SECTOR: Do you agree that providers should be given flexibility from meeting the DHS where tenants refuse access?

Don't know

Yes

No

Yes

If there anything else you would like to add on these specific questions, please provide details here :

In theory providing flexibility when tenants refuse access may be acceptable, but this needs careful implementation so as not to be abused i.e. genuine refusal by the tenant, with confidence that they understand the extent of the works and the benefits which they could bring. Furthermore, if such refusal was relied on for an exemption, the exemption should be void at change of tenancy, with a mandatory assessment of the property and works to bring it to standard (if it remained a rental property).

In theory providing flexibility in the case of physical or planning constraints would make sense, but currently in many local authorities across the country, planning restrictions prevent measures such as energy efficiency or overheating mitigation improvements; even when such measures could be allowed, planning restrictions are often sufficiently open to interpretation, that they could be used as excuse by landlords not to implement these measures. The exemption for sale / demolition / regeneration should be bounded, so it does not apply for long periods of time on the basis of theoretically planned future works, but only apply when genuinely the works would otherwise be wasted (e.g. demolition) or not financially realistic (e.g. sale).

53 THESE QUESTIONS RELATE TO THE PRIVATE RENTED SECTOR: 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 Answered

Not Answered

THESE QUESTIONS RELATED TO THE PRIVATE RENTED SECTOR: Is there anything else you would to add on these specific questions, please provide details here :

Annex A: Glossary

Annex B: List of Decent Homes Review Core Sounding Board Members