

## Consultation Response: A reformed Decent Homes Standard

---

September 2025

The UK Green Building Council represents the voice of the UK's sustainable built environment industry. We are a charity powered by more than 600 members from banks, large estate owners, housebuilders, and manufacturers to innovative startups, universities, local councils and government departments - all working to transform the built environment in the face of the climate, nature and cost-of-living crises.

---

The UK Green Building Council (UKGBC) welcomes this consultation on reforming the Decent Homes Standard (DHS). Ensuring that everyone has a safe, healthy, and decent home to live in is vital to public health, individual wellbeing, and the long-term resilience of our housing stock. We therefore strongly support the government's intention to modernise the Standard, extend it to the private rented sector, and strengthen its alignment with wider energy and climate policy.

The Decent Homes Standard currently sets minimum requirements for social housing, but this consultation proposes important reforms to update and expand its scope. By extending the Standard to the private rented sector, it will create parity across tenures and help prevent tenants being forced to live in substandard conditions. The reforms also strengthen health and safety protections by addressing hazards such as damp, mould, and heating system failures, while updating requirements to comply with the Minimum Energy Efficiency Standards (MEES). The consultation also extends the definition of thermal comfort to the whole home, and looks ahead by considering inclusion of best practice guidance on climate adaptation, water efficiency, and modern requirements such as electric vehicle charging.

In our response, UKGBC and our members focus on the areas where we can add the most value. These include the integration of minimum energy efficiency standards into the DHS and the opportunity this creates to strengthen enforcement; the need for additional guidance on climate resilience, particularly in relation to overheating and water efficiency; and the importance of ensuring that both landlords and tenants are supported with clear, practical advice on how to meet new requirements in ways that reduce costs, improve comfort, and protect health.

We welcome the opportunity to respond to the relevant sections of this consultation and support the government in bringing about these reforms which must support decarbonisation, climate resilience, and long-term social and health benefits, from reducing fuel poverty to improving mental and physical health, and helping residents feel more pride in their homes and communities.

## 1. Proposed changes to the DHS

### 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/No/Don't know

**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

#### **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

#### **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

#### **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

#### **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

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

#### **Question 17:**

Do you agree with the proposed "key" components and "other" components as listed?

☐ Yes/No/Don't Know

**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

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

**Question 19:**

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

**PROPOSAL 2 (facilities and services – criterion C)**

**PROPOSAL 3 (window restrictors – criterion C)**

**PROPOSAL 4 (home security measures – criterion c)**

**PROPOSAL 5 (suitable floor coverings – criterion c)**

**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/☐ No/☐ Don't Know

**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

**Question 28: If there is anything else you would like to add on this specific topic please do so here**

MEES needs to be directly integrated into housing condition checks, particularly those undertaken under the Housing Health and Safety Rating System (HHSRS). At present, EPC regulation and MEES enforcement sit separately which creates a gap

in enforcement. By contrast, local authority housing standards teams already have established enforcement capacity through their work on housing quality. It is therefore essential that the DHS explicitly links MEES and HHSRS together, so that housing officers can assess and enforce both simultaneously. Without this integration, there will remain a split incentive between energy efficiency policy and housing quality regulation.

In addition, thermal comfort should not be limited to cold. The DHS should explicitly address overheating risks - as summers become hotter, overheating is already emerging as a significant health hazard, particularly for vulnerable residents. Incorporating overheating assessments into the DHS would ensure landlords are responsible for both adequate warmth in winter and safe, healthy conditions during summer.

## **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?**

☐ Yes/No/Don't Know

**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

### **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~~

### **Question 31:**

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

## **2. Application of the DHS to temporary accommodation and supported housing and implications for leasehold and commonhold tenants and landlords**

### 3. 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)**

**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

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

[UKGBC's Climate Resilience Roadmap](#) sets out a vision for a more climate resilient built environment, sharing clear recommendations for the industry and policy across overheating, flood risk, and water efficiency measures

Overheating is becoming a major health and safety hazard as climate change drives more frequent and intense heatwaves. Many existing homes are poorly adapted, with high levels of glazing, restricted ventilation, and limited shading, making them vulnerable to dangerously high indoor temperatures. Without clear guidance, landlords and tenants may not know how to identify risks or take practical steps to mitigate them.

Additional guidance is needed to ensure that landlords and tenants understand and apply effective adaptation measures. In particular:

- Guidance on how to prioritise passive measures which reduce overheating without increasing energy costs. These include external shading, reducing solar gains (e.g. smaller glazing or solar control glass), improving natural ventilation through openable windows, and exposing thermal mass for night cooling.
- Simple behavioural advice for residents such as closing blinds during hot days and ventilating at night, can provide immediate, low-cost improvements.

- Guidance should clarify responsibilities: landlords should plan and invest in resilient design and maintenance, while tenants should be supported to adopt safe, effective day-to-day practices.

Climate change is already placing greater pressure on water supplies. Homes that are not designed or managed with water efficiency in mind risk both higher costs for residents and increased strain on already stretched local water resources. Without clear guidance, landlords and tenants are unlikely to know how best to manage water use or invest in cost-effective resilience measures.

Additional guidance on water efficiency within the DHS would:

- Promote practical water-saving measures such as rainwater harvesting, greywater recycling, and installation of water-efficient fixtures.
- Support behavioural change, giving tenants straightforward advice on everyday water-saving practices.
- Strengthen long-term resilience, helping landlords plan for water stress in asset management strategies and align with wider local and regional water management goals.

Embedding adaptation and water efficiency measures into the DHS guidance will ensure consistent enforcement across housing standards which can protect residents from overheating and strengthen resilience to climate change.

## **4. Implementing the Decent Homes Standard**

### **5. Meeting the Standard**

#### **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

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

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

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~~

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

Landlords will need clear, practical guidance to comply with new regulations based on their specific circumstances. Tenants must be engaged and educated on energy efficiency and low-carbon heating technologies effectively. Without a clear framework and guidance throughout the whole of the upgrade process, benefits may not be realised, leading to dissatisfaction amongst both landlords and tenants.

**~~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~~

~~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~~

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

For any questions relating to the content in this consultation please contact [policy@ukgbc.org](mailto:policy@ukgbc.org).