Response ID ANON-EU5B-W8SS-6

Submitted to A Reformed Decent Homes Standard for Social and Privately Rented Homes Consultation
Submitted on 2025-08-29 14:12:37

Ministerial Foreword

Demography Questions

1 What is your name?

Name:
Helen Miller

2 What is your email address?

Email:
helen.miller@ashford.gov.uk

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

Organisation name :
Kent Housing Group

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

Position in the organisation :
Partnership Manager

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

Local authority not responding in the capacity of a registered provider, Other (please specify) [free text]

If you responded as Other, please give details here :
District, Borough and County councils in Kent and Medway in our capacity are members of Kent Housing Group.

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

Not Answered

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 Answered

If you selected Other, please give details here :

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

Not Answered

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

Not Answered

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

10 Landlord only: Do you provide supported housing?

Not Answered

11 Landlord only: Do you provide temporary accommodation?

Not Answered

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

Not Answered

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

Not Answered

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 Answered

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?

Yes

18 LANDLORDS ONLY: Do you think that 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?

Yes

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

Yes

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

Include specific guidance for guttering and internal doors. Clarity in who is responsible for different elements between tenants and landlords.

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

Don't know

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?

No

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 :

The HHSRS applies to shared and non-shared, open spaces in private rented homes. Internal doors for bedrooms, bathrooms, kitchens and WCs are key components, but other internal doors may not be. Fire safety signage may not always be a key component.

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?

No

Kitchens, Bathrooms, Noise Insulation, Communal Areas

Yes

If you responded Yes, please provide supporting detail here :

All should be provided if applicable (some buildings do not have communal areas).

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

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)?

Yes

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

They should be non-key operable window restrictors.

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?

Yes

Not Answered

No

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 :

Exclusions relating to the fire risk assessment, e.g. fire exit doors need thumb turns, not keys.

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?

Yes

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?

No

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 :

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?

No

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?

No

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 don't agree with the word 'free' – it is practically impossible to have a home which is completely 'free' of damp and mould.

Guidance is required on what reasonable looks like.
Guidance is required on cases of over-occupancy contributing towards the mould.

We think bands F-H is harsh. Action should be on bands A-E.

People living in fuel poverty and deprivation are more likely to live in homes with condensation, damp and mould due to affordability. It is not within the Landlord's remit to remedy fuel poverty.

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?

Yes

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?

No

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?

Don't know

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?

Yes

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

It will be more challenging when major improvements/repairs are required for accommodation for vulnerable occupants due to physical or cognitive abilities.

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

Yes

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

Enforcement could be very expensive, resource hungry, for smaller authorities, time consuming, could end up in the Courts due to the reluctance of some leaseholders or affordability.

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?

Don't know

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

In already substandard blocks, it will require additional funding.
Where blocks are compliant, it shouldn't increase their costs.

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 :

Fire safety
Damp and mould – Awaab's Law

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 :

Best practice guidance for conducting checks to ensure tenants' understanding of what is being asked or proposed for those with English as an additional language, would be welcomed. Whilst support programmes try to inform families as to their rights and the law, around housing, it takes time for understanding to build, and when support ends, language may still be a barrier to understanding practices in the UK, and this would be the case many cohorts as well as asylum seekers.

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)

Other

2031

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

Other

2031

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

Yes

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 :

Dampness and mould, MEES/ thermal comfort, fire safety, window restrictors, temporary accommodation and Criterion A.

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?

Not Answered

Not Answered

Not Answered

Not Answered

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

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?

Yes

Yes

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

Provide appropriate guidance and examples of physical and planning factors preventing compliance.

Annex A: Glossary

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