

Matthew Pennycook MP
Minister for Housing and Planning
Ministry of Housing, Communities and Local Government
2 Marsham Street
London
SW1P 4DF

8 September 2025

Dear Minister,

The Chartered Institute of Building (CIOB) welcomes the opportunity to comment on the proposed reforms to the Decent Homes Standard (DHS). As the world's largest and most influential professional body for construction management and leadership, we have a Royal Charter to promote the science and practice of building and construction for the benefit of society, a mission we have pursued since 1834. Our, 50,000 members work globally in the development, conservation, and improvement of the built environment, and our accredited qualifications provide a recognised mark of competence and professionalism.

We are writing to you as we are encouraged by many aspects of the reforms to the DHS, especially the proposed extension of the DHS to private rented sector (PRS) through the Renters' Rights Bill, which CIOB believes will help improve the quality of the housing stock across the UK. We recognise the wider package of reforms, which include the new DHS, are much needed and, for the most part, welcomed. However, if too much is asked of the sector at the same time without sufficient support, we risk a patchy or unsuccessful implementation. It is important to note that the success of the first DHS was facilitated, in part, by the accompanying funding programmes, ongoing reporting and monitoring, and mechanisms to drive improvement — such as the creation of Arms' Length Management Organisations and Large-Scale Voluntary Transfers to housing associations.

While we believe an accompanying funding programme should be provided to ensure the best results, we would like to take the opportunity to highlight those areas we were particularly pleased to see included within the recent consultation published by the Ministry of Housing, Communities and Local Government (MHCLG). For a more comprehensive position on the DHS review, CIOB supports the views of the Chartered Institute of Housing (CIH). CIH strongly supports the principle of an updated DHS but emphasises that its success will depend on adequate funding, clear guidance, and a cultural shift towards prevention, resident engagement, and long-term investment in existing homes.

In particular, we welcome the proposal to remove the age condition from the definition of disrepair, ensuring tenants are not forced to live with broken or unsafe components simply because they have not reached a certain age threshold. Similarly, we support the removal of the age requirement for kitchens and bathrooms so that facilities in good working condition are not replaced solely based on age, helping to reduce unnecessary waste, reduce cost implications, and supporting sustainability. That said, we also recognise that age can still be a useful indicator for landlords when planning inspections and replacement programmes. Age could therefore be retained as a prompt for investigation, rather than a hard threshold for disrepair.

CIOB also welcomes the addition of 'fire safety measures', 'all heating technology', and 'damp and the causes of damp' to the list of key building components. As an organisation that consistently advocates for a safer built environment, we see these changes as an important step towards safeguarding all rented accommodation.

We further support the proposal to align Criterion D with the Minimum Energy Efficiency Standards (MEES), as this will encourage landlords to retrofit housing stock to an EPC rating of C or above. This is particularly important given that Government figures show residential buildings account for 20% of the UK's greenhouse gas emissions, and data indicates that 64% of private rented properties (2.26 million homes) in England and Wales are currently rated EPC D or below. We would suggest the introduction of a Home User Guide for rented accommodation, which should contain information on best practices to improve energy efficiency and for maintenance, similar to that proposed in the Future Homes Standard consultation.

Finally, we are pleased to see the introduction of Criterion E to the DHS, alongside the future consultation to extend Awaab's Law to the private rented sector. These measures will strengthen tenant protection from hazards caused by damp and mould. We particularly welcome the language used in the proposals, which avoids placing blame on tenants' lifestyles and instead treats these issues with the sensitivity they require. We look forward to seeing a future consultation on the matter and would be keen to meet with department officials to provide the views of our members, many of whom are experts in damp and mould.

The reform of the DHS comes at an important time for the housing sector, given that the last substantial update was in 2006. We would fully support the creation of a common standard across both the private and social rented sectors believe the proposed full implementation date of 2037 is appropriate, with some elements of the new DHS phased in earlier.

Priority for early implementation should be given to Criterion A (hazard-free homes), Criterion B (reasonable state of repair), and, depending on the timeline for extending Awaab's Law to the PRS, Criterion E (damp and mould) as well. Elements covered within these three categories can be considered 'health and safety critical elements' and, therefore, in a phased implementation approach, would have to be prioritised above less critical elements to ensure renters' safety.

While many socially rented homes may require limited upgrades to meet the new DHS, the same cannot be said for the PRS, which will be subject to the DHS for the first time. Many landlords will therefore need to undertake significant repair and refurbishment works to bring their stock up to standard. In light of this, we ask that you consider the capacity of the construction industry to deliver upgrades of this scale. With the retrofit challenge to meet MEES, the Government's 1.5 million new homes target, and now the DHS reforms, we must ask whether there is sufficient workforce capacity within the construction sector to meet these challenges.

We look forward to seeing these reforms progress and to continuing to support policies that improve the safety, quality, and sustainability of homes across the UK.

Should you wish to hear more about CIOB's views on the proposed changes or the work that we are doing to advocate for health and safety in the built environment, please contact us to arrange a meeting.

Yours sincerely,



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