

CIH response to Housing, Communities and Local Government Committee inquiry into housing conditions in England

Introduction

We are pleased to be able to submit this response to the committee's inquiry into housing conditions in England. Whilst appreciating that the inquiry is focused on rented housing specifically, CIH would argue that national strategic approaches to improving all housing conditions would be most effective, taking account of the flow of many homes across tenures, particularly across owner occupation and private rent, but also in the case of social housing disposals into other tenures. There are more levers available, such as regulation with rented housing, by including incentives such as through programmes of loans or grants. If these levers are combined with a more widespread availability of information and advice, housing conditions could be addressed across the country, maximising the benefit to population health and wellbeing.

Summary

Overall, there has been a steady improvement in housing conditions, particularly in the social rented and owner occupation sectors. However, future considerations of decency have to take account both of the changing nature of the UK's population (with more people ageing and living longer with life limiting conditions) and changing climate and environmental factors. The UK has the oldest housing stock in Europe,ⁱ and therefore significant and ongoing challenges to ensure existing homes are well maintained and contribute to population health and wellbeing. A broader, ambitious strategy to improve conditions across all existing homes (not limited to rented tenures) may be more effective, within which specific tenure-based action plans could be developed. CIH would welcome this being a core focus of the government's long term housing strategy, which must not focus exclusively on boosting housebuilding.

The first Decent Homes Standard (DHS) was developed as a response to decades of underinvestment and therefore poor conditions prevalent across council housing in particular. It was accompanied by specific funding programmes, ongoing reporting and monitoring, and the development of mechanisms to drive a concentrated focus on improvement (such as the creation of Arms' Length Management Organisations or ALMOs). Its success can be seen in the lowest rate of non-decent housing now being in the social rented sector, although other challenges in the social sector were left largely unaddressed, especially those relating to tenant voice, culture, and safety. These omissions led to the introduction of the Social Housing (Regulation) Act 2023 and further regulations including Awaab's Law, alongside other requirements to address building and fire safety.

In the social sector, several new requirements and regulations are still being developed, or in early stages of introduction, including a reformed DHS, Minimum Energy Efficiency Standards (MEES), and the phased introduction of Awaab's Law. As such, it is difficult at the time of writing to gauge how effective each measure might be, or the cumulative

impact of measures, in driving up decency and quality across existing homes. Engagement with our members indicates that there is uncertainty about the specifications of some requirements (such as MEES) and significant concerns about the costs of the requirements, which the various government impact assessments underestimate. For that reason, and reflecting on the success of the first DHS, CIH has highlighted the need for a comprehensive stream of funding specifically for improvements in existing homes in the longer-term, which could eventually absorb existing programmes for improving quality and energy efficiency, such as the Warm Homes: Social Housing Fund and Local Authority Housing Fund. Our analysis, as well as initial feedback on the proposals from our members, strongly suggests that the proposals under the government's consultation on rent convergence will not cover all these additional costs as well as providing the capacity needed to develop much needed new social and affordable housing.

CIH supports the measures in the Renters' Rights Bill (RRB) to give private renters greater consumer power. But expanding individual rights is no substitute for strategic intervention to drive large-scale improvements. Only a small proportion of complaints are settled by legal disputes, and it is unclear to what extent enforcement drives cultural change, especially in a sector characterised by small-scale ownership. The problem is not now a lack of enforcement powers but a lack of resources to invest in non-statutory services such as strategic intervention. The decision to give general approval to selective licensing is welcome as this is one of the few strategic tools that authorities have. A challenge for policymakers is the lack of any link between rents and repair costs but there is evidence that tenants may be prepared to pay more for modern facilities. The lack of a link with repair costs also suggests a need for targeted investment in low demand areas where there is insufficient equity for landlords to risk investment.

In terms of the number of households, particularly households with children living in temporary accommodation (TA), and the length of time many stay there, CIH supports the extension of decency requirements to this sub sector. There should be a requirement for national minimum standards including removal of any category one hazards, and inspections at appropriate stages to ensure that conditions are being maintained.

The Supported Housing (Regulatory Oversight) Act 2023 will require standards of accommodation, as well as minimum support standards, to be met through licensing regimes. We encourage government to continue working with the sector, the majority of which provide valuable and decent supported homes, to apply these requirements, and draw on the lessons from the Supported Housing Improvement Programme (SHIP). We note that some providers of quality supported housing are exiting this vital sub sector, due to the ongoing lack of revenue as well as capital investment. Whilst regulatory measures are needed and welcome, the lack of funding to support this continues to be a concern for CIH members seeking to maintain existing supported homes.

As government and the housing sector work to meet the ambition for 1.5 million new homes over the parliament, we must ensure that these homes meet or exceed the standards of decency and condition considered in this inquiry. This will minimise the cost and extent of future improvement programmes, and support landlords (and owners) to maintain their homes. We detail below the building regulations and other standards that should be required, and our concern that, whilst additional homes delivered through

permitted development rights contribute to overall targets, these are often well below the quality of homes required to meet current and future population needs.

Recommendations

Across our detailed response below, we have made several recommendations that we believe the committee should consider when making its own recommendations for government. Our key recommendations are:

- **Establish a long-term, multi-year investment programme for improving existing homes, integrating quality, safety, and decency.** This would effectively be a new, modernised Decent Homes Programme. From 2030, for social housing this programme could also encompass energy efficiency, clean heating, and climate resilience after the conclusion of Wave 3 of the Warm Homes: Social Housing Fund (WH:SHF) and a prospective future Wave; the WH:SHF remains the best way to support the sector with energy efficiency in the near-term.
- **Ensure that the forthcoming long-term housing strategy focuses on improving quality, decency, safety, accessibility, and climate resilience,** not just on how to meet the government's housebuilding targets. The strategy must also include proposed measures (such as the reintroduction of Home Information Packs) to tackle non-decency and poor energy efficiency in the owner-occupied sector, where policy levers for making improvements are currently lacking.
- **Introduce national minimum standards for temporary accommodation,** with regular inspections, hazard reporting, and resources for councils to enforce without reducing supply.
- **Accelerate the timeline for the finalisation of the Home Energy Model (HEM), the new framework for Energy Performance Certificates (EPCs), and the design of MEES target metrics.** This will help both rented sectors understand the energy efficiency standards they will be working to as soon as possible, ahead of the proposed 2030 target.
- **Adequately resource local authorities to monitor and enforce the implementation of new housing standards** (e.g. DHS, MEES, and Awaab's Law in the private rented sector), and to ensure that they can fulfil their duties under the Renters' Rights Bill.
- **Develop a national strategy for supported housing,** including secure revenue streams, increased capital investment, and a risk-based licensing approach that favours collaborative improvement.
- **Accelerate the implementation of the single consumer code and Ombudsman for new build homes, and strengthen building regulations** so that all new homes meet higher standards of energy efficiency, accessibility, and climate resilience, and occupants can access redress simply and quickly.
- **Amend the Planning and Infrastructure Bill to introduce measures to tackle the use of Permitted Development Rights (PDR),** to ensure all new homes (through whichever process) are of built to a higher quality. At the time of writing, Amendment 134, tabled by Baroness Thornhill, would be an appropriate way to accomplish this.ⁱⁱ
- **Ensure that all housing policy is actively designed to end the discrimination, stigmatisation, and inequalities faced by different groups of people across all**

housing tenures. This principle should be embedded throughout the housing system and across all policy, not considered as an add-on to already formulated policy or something to be considered only in the context of the Public Sector Equality Duty (PSED).

Answers to specific questions follow below. In our endnotes, we have also provided detailed references to the sources of our evidence, as well as further information on specific matters included in our responses to each question. We would be grateful for the opportunity to provide any further evidence to the committee should it be helpful.

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1. What is the general condition of homes in England and how prevalent are housing hazards such as damp and mould?

1.1. Overall, the condition of housing in England has been improving, as recorded in the English Housing Survey. In 2023-24, the level of non-decent housing had fallen to 15 per cent from 17 per cent in 2019.ⁱⁱⁱ Social housing has the lowest rate of non-decent homes, falling from 12 per cent to 10 per cent in that period, compared to the owner-occupied sector rate of 16 per cent in 2019 to 14 per cent. However, there has been no significant change in the rate of decency in the private rented sector (21 per cent) in that time.

1.2. Some significant differences occur across the English regions; for example, the lowest level of non-decency in the owner-occupied sector is in London at nine per cent, whilst private renters in Yorkshire and Humber face the highest non decency rates at 31 per cent.^{iv}

1.3. There has been a drop in the level of category one hazards across all tenures within the last two years, but a rise in the incidence of damp and mould; over all tenures this has increased to five per cent, with the owner occupied tenure having the lowest incidence at four per cent, and social and private rented homes at seven per cent and nine per cent respectively.^v

1.4. Whilst the improvements particularly in the worst hazards to health are welcome, this broad picture does not reflect the experience affecting different groups within the population, the owner-occupied sector, or the resilience of our homes to future challenges. We would like to draw the committee's attention to four further general areas for consideration, some of which have been analysed in recent editions of the UK Housing Review.^{vi}

1.5. Firstly, although the committee's focus is on the rented sectors, improving conditions in the owner-occupied sector remains an important and difficult challenge. Despite the figures noted in 1.1 above, the owner-occupied tenure is still by far the largest tenure (64 per cent in England). This means that even though private renting has the highest proportion of non-decent homes of any tenure, the owner-occupied sector still accounts for most homes that are non-decent (62 per cent) or have a Category 1 Hazard (65 per cent).^{vii} In addition, the largest challenge to meeting the Decent Homes Standard (DHS) is the upgrading of pre-1919 homes. There are 1.5 million non-decent pre-1919 homes in England of which 1.4 million are private housing – 906,000 owner occupied and 533,000 private rented.^{viii}

1.6. Strategic intervention by local authorities to improve poor quality housing was relatively common between 1970 to 2000. During the previous Labour administration, the Housing Market Renewal Pathfinder Initiative was a large-scale strategic intervention programme for private sector housing,^{ix} and prior to that, renovation grants were accessible.^x However, with the intense pressure on council finances after 2010, non-statutory services such as local private sector housing teams have been severely cut back and large-scale interventions have become a rarity. Home Information Packs, which were in force for just over a year (2009-2010) before being abolished,^{xi} could also have been an effective method in encouraging homeowners to improve conditions, and the case for these should be reconsidered. In sum, there are very few effective public policy levers to improve conditions in the owner-occupied sector.

1.7. Secondly, the 2025 UK Housing Review highlights that by 2066 there are projected to be a further 8.6 million UK residents aged 65 years and over, with the most significant increase occurring in the age group 85 years and over.^{xii}

1.8. The UK Housing Review concluded that there is therefore a growing need to adapt existing homes in England for an older population with a greater prevalence of long-term illnesses and disabilities. However, in its most recent analysis of this topic, the English Housing Survey: Home adaptations report, 2019-20 estimated that over half of households requiring adaptations did not have all of the adaptations they needed.^{xiii} This means that the accessibility of homes in England is, and will increasingly be, ill-suited to the needs of the population. CIH believes that more action is required to retrofit aids and adaptations into existing homes.

1.9. Thirdly, the 2025 UK Housing Review also highlights that homes in England are generally not resilient to the risks posed by climate change, especially extreme events such as storms, flooding, heatwaves, and wildfires.^{xiv} In general terms, as warming accelerates past 2°C the frequency, duration, and intensity of extreme climate events will increase.

1.10. This means that by 2050, eight million homes in England will be at risk from flooding,^{xv} and by the same year heat-related deaths could rise several times over to exceed 10,000 in an average year.^{xvi} Already, academic research undertaken by CIH in collaboration with the Universities of Bath and East London demonstrates that the prevalence of indoor overheating reported in UK homes increased from 20 per cent in 2011 to 82 per cent in 2022,^{xvii} and wider evidence of the negative societal, health, and economic impacts of extreme climate events is growing.^{xviii}

1.11. CIH believes there is an increasingly urgent need to make new and existing homes more resilient to our warming world, which in many cases can be accomplished by retrofitting simple measures such as shutters, flood resilient doors, and self-closing air bricks.^{xix} This imperative must be placed on an equal footing with the installation of low-carbon heating and energy efficiency measures.

1.12. Fourthly and finally, we would emphasise that the experience of poor housing and prevalence of hazards is not the same across socio-demographic groups. Issues surrounding poor housing fundamentally intersect with issues of social and racial (in)justice.

1.13. In 2024 CIH, based on an analysis of the English Housing Survey, demonstrated that social rented households with an ethnic minority or disabled household reference person^{xx} are more likely to live in homes with Category 1 Housing Health and Safety Rating System (HHSRS) hazards and more likely to agree with the statement 'I do not feel safe at home because I fear that a fire may break out'.^{xxi} National survey data analysed by the Resolution Foundation also found that disabled people, and people from Pakistani or Bangladeshi, black, or mixed/multiple ethnic groups, were much more likely to be living in poor quality housing.^{xxii}

1.14. We would encourage the committee to place issues of social and racial (in)justice at the centre of its inquiry, and seek to make recommendations to government that, if implemented, will reduce the discrimination and housing inequalities faced by different groups of people across all tenures.

2. How effective will the proposed reforms to the Decent Homes Standard be at improving the conditions of social housing?

2.1. CIH has consistently called for investment in the quality of existing social homes, alongside an updated DHS and a funding framework to support delivery.^{xxiii} An improved standard is not just about reducing the likelihood and incidence of health and safety risks; its introduction is also intended to enable providers to plan with confidence and continue delivering new social housing.

2.2. The proposed reforms to the DHS are therefore welcome, and clearly have the potential to improve the condition of social housing. Overall, we agree with the move towards a more outcomes focused standard that reflects resident expectations of safety, quality, and dignity, and we concur with the government that clearer standards and enforcement mechanisms are needed. At the time of writing, CIH is continuing to work with our members and partners to understand and analyse the detail of the proposals. However, it is already clear that the success of the proposals will depend on how effectively they are implemented and supported.

2.3. While our engagement with members and sector partners is ongoing, the most significant challenge for the social housing sector is likely to be meeting the cost of the updated standard in the context of competing financial pressures, especially in relation to building safety, decarbonisation, repairs and maintenance, and building new homes.^{xxiv} Our analysis, as well as initial feedback on the proposals from our members, strongly suggests that the proposals under the government's consultation on rent convergence will not cover all these additional costs as well as providing the capacity needed to develop sufficient numbers of new social and affordable housing.

2.4. To meet these costs, further funding for improving existing homes is likely to be needed. In the short-term, we wholly welcome the action the government has taken to expand the Warm Homes: Social Housing Fund, open cladding remediation funding to the sector, as well as looking to implement a long-term rent settlement with rent convergence. In the medium- and long-term, we believe there is a case for a single, multi-year investment programme – aligned to the updated DHS – that brings together safety, energy efficiency, accessibility, climate resilience and decency under one coherent funding programme.^{xxv}

2.5. Our engagement with members has also highlighted several barriers that could limit the effectiveness of the new standard if they are not addressed.^{xxvi} Many providers are still working with incomplete or inconsistent stock data, making it difficult to plan and prioritise with confidence. The de-prioritisation of age in Criterion B, while being undertaken for good reasons, may have unintended consequences; it could particularly affect the ability of providers to design and manage planned improvement programmes in a cost-effective way and requires careful consideration and design ahead of being implemented. Workforce shortages – particularly in specialist roles such as surveyors and damp and mould assessors – are also affecting delivery. Clarification is required about how the new standard will align with Awaab's Law, the HHSRS and consumer regulation, and the risk of duplication or legal ambiguity where guidance is unclear. Rising contractor costs, inflationary pressures, and the scale of disrepair claims compound these challenges.

2.6. We have previously been clear that alongside regulatory change a cultural shift is also essential.^{xxvii} Through our work on professional standards and resident experience, we are also supporting more responsive, respectful services rooted in competence and accountability.^{xxviii} The new DHS is an important opportunity to improve quality and consistency – but its success will depend on how well it is integrated into everyday practice, how fairly it is enforced, how it is funded, and ultimately whether it leads to meaningful outcomes for tenants.

2.7. Lastly, the government’s proposals ask whether the implementation of the new DHS could hamper the supply of temporary accommodation (TA). We do have a concern that councils may put significant effort into procuring their own TA to better protect council finances, but that possible incoming standards and regulations applied to TA provision will render those units located in blocks designated for regeneration as unusable. We have provided further evidence on the challenges of upgrading housing conditions in TA below.

3. Have social landlords been abiding by the Decent Home Standard, and are the consequences for non-compliance tough enough or do these need to go further?

3.1. The social rented sector has the lowest rate of non-decent homes at 10 per cent; the result of significant inward investment and the long-term DHS Programme to improve housing conditions, and associated funding stream available, in the early years. However, there have been some significant failures, notably the tragic loss of Awaab Ishak due to prolonged exposure to damp and mould in his home. This has led to an increased focus specifically on the issue of damp and mould, with the Regulator reporting on how the social sector is responding,^{xxix} and the Housing Ombudsman producing a series of resources to support landlords to learn from associated complaints.^{xxx}

3.2. The Regulator’s global accounts show investment of £7.7 billion into existing homes in 2023, an increase of 20 per cent on the previous year.^{xxxi} The slight increase in incidence of damp and mould across all tenures to five per cent in 2022-23 may be attributable in part to the increase in energy costs resulting in some homes being underheated, indicated by the fall of energy consumption by 11 per cent in 2022.^{xxxii}

3.3. The Regulator’s programme of inspections into the new consumer standards also highlights the performance of landlords in relation to the safety and quality of their homes, and their tenants’ satisfaction with homes and services provided. All of this collectively reflects the drive to improve homes and will be an effective lever to ensure that social landlords deliver on commitments to improve and invest in their existing homes. The Regulator has strengthened powers to intervene where landlords fail, including requiring improvement plans and fines. This is a relatively new regulatory regime, and should be monitored to see if it will be sufficient or whether additional measures or powers are needed to maintain safety and decency within social homes.

4. What should be included in the Regulator of Social Housing’s forthcoming Competence and Conduct Standard to help improve the service social tenants receive?

4.1. The Competence and Conduct Standard should drive professionalism across the housing sector, establishing the scope of knowledge, skills and behaviours required

across senior housing managers and executives in the sector, underpinned by appropriate qualifications.

4.2. As proposed by the former government, we believe the Competence and Conduct Standard should set clear expectations for everyone working in social housing by requiring each provider to have a written workforce development policy covering training, appraisals, performance management and continuous professional development. This should ensure that staff in all relevant roles have the right skills, knowledge, experience and behaviours, supported by a robust code of conduct and ethics that promotes empathy, respect and tenant-centred service. This is supported by mandatory qualifications for senior housing managers and executives.

4.3. CIH supports this wider approach, which is designed to ensure that housing organisations establish a culture of listening and responding appropriately to tenants, and recognises the importance of accountability for the landlord and tenant relationship. Extending requirements to service providers where appropriate, but with a pragmatic scope, will help maintain essential capacity while ensuring consistent professionalism. This approach would ensure the standard is meaningful, deliverable and tenant-focused, while managing transition risks and safeguarding the quality of housing services.

5. How effective is the Housing Health and Safety Rating System as a framework for identifying hazards and how could it be improved?

5.1. Alongside the DHS review, a review of the HHSRS was initiated, which proposed some simplification and amalgamation of hazards, and refreshed guidance. The necessary measures to change regulation was to be introduced after the DHS review was completed.

5.2. The risk-based approach is important to enable landlords and tenants to identify and address the most serious hazards to health. Refreshed guidance with baseline assessments should make the system more understandable for landlords and tenants. It would enable both to have a shared understanding of what safety and decency looks like in relation to different parts of the home.

6. What will the impact of Awaab's Law be on social housing providers, and will this affect social and affordable housing supply?

6.1. Awaab's Law marks a critical step in strengthening residents' rights to live in safe, healthy homes, and in ensuring serious hazards are addressed swiftly and consistently. CIH welcomes the renewed focus and investment in social housing – including the introduction of Awaab's Law – as a necessary and timely opportunity to address long-standing inequalities in housing quality, and we are committed to supporting its delivery through the right guidance, skills and sustained cultural change. We also recognise the role of Awaab Ishak's family in bringing this legislation forward, and the widespread commitment across the sector to delivering on its intent in an area of deep concern for many residents.^{xxxiii}

6.2. While there is strong support for addressing the most serious hazards first, the scale of preparatory work already underway is substantial. Many landlords are investing in new staffing structures, diagnostic tools, asset data improvements and triage processes. These steps are essential but costly. Members have told us that contractor costs are rising,

recruitment is becoming more difficult in key areas such as damp and mould inspection, and that workforce constraints are limiting their ability to respond at pace.

6.3. In addition, Awaab's Law is being implemented alongside a reformed DHS, new consumer regulation, cladding remediation, and decarbonisation. Providers have made clear that the combined impact of these reforms, and the pace at which they are being introduced poses potential risks to organisational capacity. While we have no specific evidence that this is occurring as a direct result of Awaab's Law, it is entirely possible that additional investment in meeting the new legislation could restrict the ability of some providers to build new social homes.

6.4. CIH's work, alongside recent sector and government research, shows that poor housing affects more than health – it undermines trust, belonging and dignity.^{xxxiv} If Awaab's Law is to succeed in restoring trust, it must be delivered in a way that supports voice, safety and community.

7. What impact will the government's proposed Minimum Energy Efficiency Standards have on the social housing sector?

7.1. CIH supports the introduction of Minimum Energy Efficiency Standards (MEES) in the social rented sector, and we welcomed the publication of the government consultation.^{xxxv} The social housing sector has invested significantly in improving the energy efficiency of homes in recent years, despite the absence of a formalised regulatory framework.^{xxxvi} The publication of the proposed MEES is therefore aligned to longstanding work. Despite this, and while CIH is still working with members to assess the full implications of the proposals, we do have reason to think that some of the impacts of the policy will be very challenging (but not impossible) for the social housing sector to navigate.

7.2. Most prominently, there are several possible consequences of changing the target metric(s). The MEES proposals include a shift away from the using the current Energy Costs metric on EPCs (the Energy Efficiency Rating or 'EER') as the minimum standard. This is the metric that the sector has been working towards for several years. Instead, the consultation states that MHCLG's preferred position is using a 'primary' Fabric Performance metric, towards which investment will first be required, followed by investment towards one of two 'secondary' metrics: Smart Readiness or Heating System. It would be the choice of the housing provider as to which secondary metric is met. Broadly, the justification for this approach is that it reflects a fabric first philosophy, which CIH believes is generally the right approach for upgrading energy efficiency, while also attempting to incentivise the installation of other low-carbon technologies that can reduce energy bills further and begin to decarbonise home heating at scale.

7.3. However, based on our initial analysis and engagement with members, this preferred approach will present the sector with challenges:

- The preferred approach is significantly more complicated than using the EER as the minimum standard, especially once the proposed transition regime is factored in. This will, at minimum, increase familiarisation costs and time for the sector.
- To date, sector business plans, energy modelling analyses, and planned investment programmes have been premised on an assumption that the EER will be the MEES target for 2030. If the preferred approach in the consultation is taken forward, it will require these plans, analyses, and programmes to be revisited.

Some providers have already informed us that considerable work will be required to do this and that this may make complying with a 2030 target challenging.

- Reducing EPC validity periods from 10 years to five years, which was proposed in the government's previous consultation on EPC reform, could have the unintended consequence of diverting investment away from fuel poverty reduction measures towards commissioning EPCs more frequently, for little to no gain for resident or landlord.^{xxxvii} CIH feels government should make it clear that EPC renewals are only required in the social housing sector at specific trigger points, e.g. when energy efficiency measures are installed or as part of void relet work, not after a set number of years.
- The preferred approach may force some providers to redirect planned investment in solar PV to insulation to meet the primary Fabric standard. In some cases, the installation of solar PV can have a more substantial and cost-effective impact on fuel poverty than fabric improvements. This is especially the case in electrically heated homes (e.g. homes with storage heaters), because solar PV generation can reduce heating as well as power costs for tenants in such homes. Solar PV can also be a more viable option for tackling fuel poverty in very old homes that may not be able to meet any Fabric standard within the confines of £10,000 cost cap, or potentially at all. In these cases, some flexibility or mechanism to ensure providers consider the installation of solar PV before registering an exemption under the cost cap may be worthy of consideration by MHCLG.
- More generally, until the government has provided clarity on the design of its new EPC framework, the Home Energy Model (HEM), and where the minimum standard will be set on the new metrics, it will be very difficult for the sector to understand the deliverability of the proposals, and their wider impacts.

7.4. Beyond challenges with the target metrics, we would also draw the committee's attention to the following areas of consideration:

- We have concerns about the ability of some social housing providers to meet the spending requirements of the policy. This is especially likely considering the large ongoing costs for some providers of meeting adjacent regulatory and legislative requirements, noted in 2.3 above, as well as building new homes.^{xxxviii}
- There is no consideration, anywhere in the consultation, of the importance of ensuring that energy efficiency upgrades are tailored to the circumstances, preferences, and needs of tenants. CIH believes that, at some level, tenants must have a say in what energy efficiency measures are prioritised by their landlord.

7.5. Overall, our initial view is that the proposals are welcome, but that further clarity on the detail – especially regarding the design of the EPC framework, the Home Energy Model (HEM), and where the minimum standard will be set on the new metrics – is required. Nevertheless, we firmly believe that with open, collaborative engagement with the sector, government can develop the policy in a way that is affordable and deliverable, while meeting shared priorities around statutory fuel poverty targets, carbon budgets, and decency.

7.6. We also believe further funding will be required to support the sector to meet the costs of the proposals, whatever their final design. In our view, in the near-term this should

be provided through a significant expansion of the Warm Homes: Social Housing Fund when the government's Warm Homes Plan is published in Autumn. In the medium- and long-term, government should explore setting up a single, multi-year investment programme for social housing, as per 2.4 above.

8. How can technology help to monitor and improve the condition of homes, and what more can the government do to facilitate the effective use of technology in this area?

8.1. Many social landlords have already installed technology to monitor levels of humidity, temperatures and other factors that can trigger concerns about damp, mould and condensation. The data provided, alongside stock conditions surveys and identification of vulnerabilities in certain housing typologies, provide information which helps landlords to target interventions.

8.2. However, it is also important to realise that interventions are more effective when they also incorporate knowledge of the households within the homes, and the needs of each that may require more tailored and 'wrap around' approaches (such as financial advice, help switching energy providers or health and wellbeing support).

8.3. For smaller landlords or those with limited resources, having examples of what is working, and how organisations use the technology and data alongside a wider approach based around household's needs would be valuable. The government and sector bodies, including CIH, have a role in helping landlords understand the benefits of technology and how to utilise it more effectively. Guidance from government around what technology to use and when, and how this may support wider approaches to climate resilience in homes, may be appropriate as part of the proposals to support the sector in going above and beyond the minimum DHS (as proposed in the consultation on a reformed DHS).

9. What other measures can the government take to support social landlords and residents to take effective action against hazards and improve the condition of non-decent homes?

9.1. Improving housing conditions will take more than setting minimum standards. To support social landlords and residents in addressing hazards and achieving lasting improvement, government must go beyond compliance – providing sustained support, clearer accountability, and better coordination across systems. That includes backing the professionals responsible for delivery, investing in the right tools and skills, recognising where current levers are misfiring, and grounding policy changes in the everyday work of housing professionals.

9.2. One immediate priority is tackling the rise in disrepair claims and the growing influence of claims management companies. While CIH are very clear that residents must have access to legal redress, current practices are placing pressure on providers, diverting resources away from planned work and slowing progress. CIH welcomes the government's commitment to launch a Call for Evidence on claims farming in housing disrepair cases, and to work with the Ministry of Justice on ensuring fairness in the system. We will support this process to help protect residents from both unsafe conditions and exploitation, and to ensure that legal redress is not undermined by unscrupulous practice.

9.3. Undertaking an independent review of how the reformed DHS is working in practice over its first three years could be a useful way to support effective delivery. Ideally, this could be undertaken by a panel comprised of residents, sector professionals, legal and health experts, with a focus on outcomes, service quality, and any unintended consequences that risk undermining delivery.^{xxix}

9.4. Better data, and a more consistent framework for interpreting it, will also be essential. Landlords need proportionate, aligned reporting across DHS, HHSRS and Awaab's Law, as well as clear expectations. To deliver this, the sector will require accessible guidance, support for consistent assessments of condition and vulnerability, and local capacity to track and act on risk in real time.

9.5. We also encourage government to support risk-based, resident-informed repairs strategies that reflect how housing conditions intersect with health and inequality. The Marmot Review 10 Years On confirmed housing remains a key social determinant of health, with poor conditions linked to illness, mental distress and excess winter deaths.^{xl} If a future update to the Marmot Review or related analysis emerges, it would offer a timely opportunity to further strengthen the links between housing quality, health improvement and integrated care strategies.

9.6. Lastly, voluntary standards, such as the Greater Manchester Good Landlord Charter, can also show the potential of local partnerships in setting cross-tenure standards and strengthening tenant voice.^{xli} These place-based approaches can foster trust and early resolution in ways regulation alone cannot.

10. Does the Renters' Rights Bill go far enough to address poor housing conditions in the private rented sector?

10.1. As the title of the Renters' Rights Bill (RRB) implies, its main focus is individual rights rather than strategic intervention. The RRB removes the risk of retaliatory eviction if a tenant wishes to take enforcement through the courts, but does not go any further to address the other reasons why they might not to do so. These reasons might include having insufficient resources to risk legal costs, fear of a retaliatory rent increase, or simply wishing to maintain cordial relations.

10.2. The fact that the RRB provides more than one means to pursue a complaint (i.e. private litigation, recourse to an Ombudsman, local authority enforcement) does increase the chances that poor conditions will be addressed. However, it is still unlikely that a system that relies on individual complaints will result in significant improvements to poor housing conditions in the sector. Only a small proportion of those affected are likely to pursue legal action through to its conclusion, and this is also likely to be true for those who go through the internal complaints procedure and escalate it to the Ombudsman.^{xlii}

10.3. Even when tenants pursue a complaint through to the end, the impact on the local market and on the sector is likely to be limited. Evidence is clear that most of the private rented sector is comprised of landlords who have less than ten properties and that most of these are in scattered locations. We are not aware of any studies or other evidence as to the effect that successful civil litigation, financial penalties, or criminal convictions has on a landlord's overall behaviour and so it is difficult to assess what the overall impact will be.

10.4. Recent regulatory changes and the RRB may help councils to improve housing conditions in two main ways. The first of these areas is selective licensing, which is one of the few strategic tools available to local authorities to improve conditions, and the role of the landlord database. CIH welcomes the recent decision by the Minister to give general approval to new selective licensing schemes so that the Secretary of State's confirmation is no longer required. Following general approval, each scheme must meet specific conditions, including having a high proportion of privately rented homes, noted in statutory guidance as higher than the national average (19 per cent).^{xliii} Until the database is in place local authorities have no way of knowing for certain how many privately rented homes are in their area, and where they are.^{xliv}

10.5. The second key relevant area in the RRB relates to local authority enforcement. Local authorities already have a wide range of powers^{xlv} that are being supplemented and enhanced by the RRB. The problem is the severe financial constraints under which authorities currently operate where there are few resources for non-statutory services. Authorities have a duty to act where they identify a Category 1 Hazard, but many have only a few full-time staff leaving little capacity for strategic intervention. The government is relying on penalty income to expand enforcement, but this requires some up-front investment (e.g. staff recruitment and training) based on an income stream that is lumpy and difficult to predict. Authorities must act reasonably, and most interventions are settled by negotiation which won't generate income. The landlord database should help improve the quality of evidence but is unlikely to eliminate the risk or up-front costs.

10.6. Ultimately, individual enforcement is only ever a poor substitute for strategic action. In extreme cases it may ultimately mean that the landlord simply sells up and the property transfers to the owner occupier sector – where there are even fewer effective public policy levers to improve conditions. The lack of intervention in the owner occupier sector matters regardless of whether owners choose to opt out of repairs and improvements, as emphasised in 1.5 and 1.6 above.

11. How effective will the introduction of the Decent Homes Standard be at improving the condition of homes in the private rented sector?

11.1. CIH welcomes the prospective introduction of the DHS to the private rented sector, which we have called for across many years. However, a significant challenge for policymakers is how to improve private rented conditions in a market where rent levels are primarily determined by location, and not property condition.

11.2. In addition, there is no link between rent levels and estimated repair costs. Typically, the increased rental value that can be obtained from carrying out repairs is substantially less than the repayments required to finance it.^{xlvi} The lack of a link between rents and repair costs is why policy proposals such as linking housing benefit to property standards are likely to fail even if local housing allowance rates are regularly up-rated.

11.3. However, there is a link between rents and inadequate, poor or outdated sanitary, bathroom or kitchen facilities. Not surprisingly, while tenants are likely to undervalue the cost of major repairs, they are much more likely to take these facilities into account in deciding what they are prepared to pay. This suggests that an approach that combines tackling the backlog of repairs with upgrades to modernise facilities might have a greater chance of success than one focuses only on repairs alone. In England, there are 6.3 million

owner occupied, 4.4 million social rented, and 2.5 million private rented homes with non-modern facilities.^{xlvii}

12. What impact will the introduction of the Decent Homes Standard have on landlords in the private rented sector? What impact would applying Awaab's Law to the private rented sector have on landlords and will this affect housing supply in the private rented sector?

12.1. It is very difficult to estimate the numbers of landlords who may withdraw from the sector due to the measures in the RRB, which include the application of the DHS and Awaab's Law, but it is likely to be substantially less than that suggested by landlord survey data. While it is acknowledged that a small proportion of landlords – particularly those with marginal or non-compliant properties – may exit, available evidence suggests no overwhelming trend toward a large-scale exit among responsible and professional landlords in the PRS. Many are preparing to stay, adapt, and continue providing rental homes under the new regulatory landscape. Nevertheless, it seems likely that there will be some loss of private rented dwellings to owner occupation where, as noted above, there are even fewer policy levers for improving conditions.

12.2. There will be a small number of properties where the investment required to improve and/or repair outweighs the economic value of doing so. These are likely to be pre-1919 dwellings and/or with very poor EPC energy efficiency ratings (i.e. in the lower EPC bands). Around nine per cent of all dwellings in England are in the three lowest bands (E, F, G) of which one third (three per cent) are in bands F and G, which it is already unlawful to let in the private rented sector.^{xlviii} Just under four in every ten dwellings (39 per cent) are in band D and this presents a bigger challenge. The estimated average investment required to raise a private rented dwelling from band D or below to band C is £6,864.^{xlix}

13. How can the government ensure that new-build homes are as high-quality as possible?

13.1. CIH has consistently stated that, although we require substantially more social and affordable homes, these homes must be built to a high standard. We welcome the government's ambition to build 1.5 million new homes in this parliament, and will continue to support our members in their organisational development plans.

13.2. There are three primary ways we believe new homes can be made as high quality as possible. Firstly, the New Homes Quality Code is an initiative for developers to agree to standards to ensure all new homes are built to a high quality, alongside the creation of the New Homes Ombudsman.ⁱ In October 2024, the government [committed](#) to recommendations by the Competition and Markets Authority (CMA) for mandatory status of the New Homes Ombudsman, alongside a single consumer code for new-build homes.ⁱⁱ Progressing these recommendations would be a significant step towards higher quality homes.

13.3. Secondly, government could strengthen building regulations and ensure that these regulations are adhered to by developers, particularly in three areas we have mentioned elsewhere in this submission: energy efficiency, accessibility, and climate resilience. Taking each in turn:

- CIH analysis of government data shows that in the last 10 years, over 100,000 homes have been built that are EPC Band D or below. In 2024 alone, this analysis shows that over 6,000 new homes were built with an EPC rating of Band D or below.^{lii} Every new home that is constructed and occupied today that does not meet a high energy performance specification is putting current and future generations at risk of fuel poverty, and government should therefore confirm the final design of the Future Homes Standard and updates to Part L without delay.
- In September 2020, the previous government consulted on raising accessibility standards in new homes. In July 2022, it confirmed its intention to mandate the current M4 (Category 2: Accessible and adaptable dwellings) requirement in building regulations as a minimum standard for all new homes, subject to further consultation on draft technical details. This has significant cross-sector support in the housing, health, and built environment sectors, but the technical consultation has not yet been published. Finalising and implementing M4(2) should be seen as a priority for building high-quality and accessible new homes.
- Most new homes will be occupied until at least 2080, but are not being built to higher levels of resilience to climate change. For example, there is no building regulation for flood resilience, despite the ongoing construction of new homes on flood plains. Part O of the building regulations, which aims to prevent overheating in new homes, is a relatively recent addition. However, in 2025 analysis by CIH and Glasgow University demonstrated that there is very limited evidence homes built to Part O will be resilient to the higher temperatures and more frequent heatwaves that a world of 2°C or 3°C warming will contain.^{liii} Ideally, Part O and the wider building regulation regime should be reviewed or 'stress tested' to understand whether homes being built to current standards will be able to cope with the extreme climate events we will see in the future.

13.4. Thirdly and finally, government must ensure that all new homes are of a decent and safe standard, whether these are permanent or temporary homes. One barrier to achieving this is the continued use of permitted development rights (PDR). The conversion of non-domestic premises (e.g. office blocks) to housing through PDR is creating unsustainable, poor-quality homes that harm the environment as well as their occupants.^{liv} CIH has [consistently](#) outlined these concerns, and supports amendments to the Planning and Infrastructure Bill to tackle the use of PDR, to ensure all new homes (through whichever process) are of high quality. We also support the TCPA's healthy homes principles as setting some minimum requirements to ensure new developments enable healthy and independent living.^{lv}

14. How prevalent are the “appalling conditions” the committee found in some instances of temporary accommodation in its recent inquiry, and how can the government best address this?

14.1. Ascertaining the prevalence of the conditions in TA nationally is challenging, due to a general lack of reliable data and a lack of national and local authority-level oversight of the type and conditions of TA used to house homeless households.

14.2. Currently, the [EHS](#) does not include dwellings used as TA or exempt supported accommodation. In the latest release of EHS statistics, it was estimated that 21 per cent of private rented sector dwellings were non-decent;^{lvi} however, it is impossible to

understand how much of that stock may have been used or converted for temporary accommodation and the proportion of that stock that is non-decent.

14.3. In addition, the only publicly available data source that reports the types of provision used for TA is the quarterly accredited statutory homelessness figures released by MHCLG. From these figures, compiled from local authority Homelessness Case Level Collections (H-CLIC) returns, we can ascertain the reported proportion of TA type according to the six procurement categories given. However, no consistent evidence is gathered on quality through these data returns.^{lvii}

14.4. A lack of robust, national-level data means that the research and campaigning of charities, housing organisations, and others remains the best source of information we have about the prevalence of poor conditions in TA. Usually, this evidence shows that acceptable standards, particularly the legal requirement on local authorities to ensure that TA is free from Category 1 HHSRS hazards, is not being met. For example, in a survey by [Shelter](#) in 2023, 40 per cent of respondents reported problems with damp, mould or condensation in their TA,^{lviii} and there is no procedure for local authorities to report if their stock of TA meets this criterion.

14.5. Furthermore, we are aware of examples of councils using empty blocks of flats, often designated for future regeneration or demolition, as TA.^{lix} While not a new practice, some of these examples provide further evidence for the prevalence of poor conditions. One council, for instance, is considering the use of eight blocks for TA despite significant fire safety risks, and we have been informed of other cases where children placed in such accommodation have developed asthma. For blocks of flats designated for regeneration that are in a decent condition, it is possible, due to their eventual fate, that they will receive inadequate repairs and maintenance, and fall into disrepair. This is a considerable concern, especially as the most common length of time for households with children to be in any type of TA is over five years.^{lx}

14.6. Poor conditions in TA have been fundamentally exacerbated by a lack of investment and regulatory requirements in recent years. The subsidy rate for TA has been frozen at 2011 levels and TA has consistently been exempted from government proposals to improve housing conditions; there are consequently no national minimum standards set or expected of such accommodation.^{lxi} There is no requirement or consistent pattern of [inspection](#) of TA nationally before a household's placement, meaning that there is no set mechanism whereby local authorities can demonstrate the suitability of such accommodation in accordance with [Part 7 of the Housing Act](#).^{lxii} Ultimately, this means that any existing standards are dependent on the individual culture of each local or combined authority.

14.7. In summary, there are significant gaps in regulation across each type of accommodation used by local authorities to meet their statutory duty. This leaves considerable room for inconsistencies in the standards of TA and the ample space for poor conditions to be prevalent and routinely accepted in a system under pressure. Whilst building quality social rented homes is the long-term solution to this crisis, we would like to see the government consider the following immediate recommendations:

- Develop and introduce national minimum standards for temporary accommodation and ensure that local authorities are well resourced to implement

and enforce such standards. These standards could include a mirror of the Empowerment Standard, as proposed in the recent consultation on [supported housing](#) regulation, whereby the provider must have clear, simple, and accessible complaints and redress procedures in place.

- Require inspections of TA and keep the suitability of that accommodation under review, as per the [recommendation](#) of the Local Government and Social Care Ombudsman and [this Committee](#).
- Implement mandated reporting of category 1 hazards in the provision of TA.^{lxiii} Additionally, in cases of good faith providers, where local authorities have identified a Category 1 Hazard, it may be more proportionate to issue 'hazard awareness notices' to avoid enforcing improvement notices that could diminish supply.
- End the placement of household with children in B&Bs or hotels for longer than the legal six-week limit and end the placement of single homeless adults with households with children, in accordance with the recommendations put forward by the Children's Commissioner.

15. Has there been any progress in tackling the “shocking conditions” in exempt accommodation, identified by the predecessor to this Committee in 2022?

15.1. CIH has previously contributed to the introduction and development of the Supported Housing (Regulatory Oversight) Act 2023 (SH(RO)A), as well as to programmes led by MHCLG regarding the imminent regulatory framework. As such, we are vocal proponents of the incoming licensing scheme and other elements of the Act in their ability to increase the quality standards in the exempt sector and eradicate the conditions outlined in 2022.

15.2. The quality and condition of exempt accommodation must be considered in the context of two different types or groups of supported housing. The first is the minority group of poor-quality, unregulated exempt accommodation. This form of accommodation is delivered by unscrupulous providers looking to take advantage of taxpayers' money, mainly operating short-term accommodation for those experiencing homelessness, and who have little incentive or will to undertake material improvements to their properties.

15.3. It is this first type/group of exempt accommodation that is the primary target of the SH(RO)A. CIH's submission to the government's recent consultation on the expected supported housing licensing scheme strongly supported the proposed measures to ensure that compliance with relevant accommodation requirements is mandatory to acquire a supported housing license.^{lxiv} If the proposed measures in the recent consultation go through, they will have the ability to fine £30,000 for offences in line with selective licensing regimes and HMO licensing. If local authorities are adequately resourced to enforce their duties, much of the provision will leave this market.

15.4. The second type/group of exempt accommodation is that of most of the supported housing sector. Of an estimated [535,400](#) supported homes in England, the majority is long-term settled accommodation for older persons and those with lifelong mental and physical conditions.^{lxv} The remainder are transitory accommodation that house and support people during times of crisis, such as those fleeing domestic abuse, those discharged from clinical settings and people experiencing homelessness. It is in these

short-term and transitory services that exploitative models of provision flourished. At their best, however, these services provide transformational support to help individuals move forward from a traumatic period in their lives and live independently. As a whole, the supported housing sector constitutes a crucial pillar of our housing system and generates [substantial savings](#) to the public purse.

15.5. However, this vital sector has operated within a challenging environment for over a decade. Following the demise of Supporting People, a £1.8 billion per annum ringfenced fund available for housing-related support that ran between 2003-2009, the sector has experienced a continued reduction in funding, less reliable funding via short-term commissioning cycles, and ever-increasing operational costs.^{lxvi} Since the government came into power, there have been no announcements concerning the sector beyond the remit of the SH(RO)A and supported housing was removed from the relevant minister's title. Without strategic and substantial intervention, many people will lose suitable, dignified homes, and the housing and homelessness crisis will deepen.

15.6. It is the continued absence of a serious funding settlement for supported housing which is the most significant cause of poor conditions and barrier to improving them. There is a distinct lack of capital investment available to improve or remodel existing schemes. This means that good providers are unable to enhance services to align with current and future specifications and needs. The previous government funded select local authorities to establish [Supported Housing Improvement Programs \(SHIPs\)](#), whose aims were to improve the standards of such accommodation, expand oversight, encourage better value for money and identify best practice. Those authorities participating in the SHIP pilots managed significant improvements in conditions, preferring to use informal notices to maintain positive relationships with providers rather than resorting to punitive enforcement.^{lxvii} In contrast, the government has been clear that local authority supported housing licensing schemes will need to be self-funded.

15.7. To protect the future of supported housing and improve its supply, we would like to see local authorities deploy a risk-based approach to supported housing licensing enforcement, prioritising collaborative conditions for improvement over punitive enforcement. Fundamentally, we also need a long-term, national strategy for supported housing, with clearly identified revenue streams for improving conditions and increased capital investment to grow supply.^{lxviii}

16. How can local authorities best be supported to take action against rogue landlords operating in the temporary and exempt accommodation sectors?

16.1. Different, but overlapping issues affect temporary and exempt accommodation, whereby a distinct lack of genuinely affordable housing has allowed actors to exploit regulatory gaps and charge market rates or higher at the taxpayers' expense.^{lxix}

16.2. In TA, evidence provided by our members shows that providers are withdrawing and raising costs at will, and that private rental sector landlords are evicting tenants and then presenting themselves to the local authority as providers of nightly-paid accommodation. While some councils will not accept these offers, accommodation of this kind is increasingly being procured by the Home Office or other councils to use as out-of-area placements.

16.3. To prevent this, we would recommend putting in place a 'procurement notice' whereby outside local authorities and the Home Office are compelled to inform any local authority if they intend to procure accommodation within it. At this point, the local authority can reveal if the proposed landlord has exhibited rogue behaviour towards them, and the procuring body should cease and desist if this is the case. Presently, section 208 of the Housing Act 1996 exists to notify when households are out of area. However, a procurement notice could serve to stop those who must be sent out from being sent to homes already deemed 'rogue' by another local authority.

16.4. In relation to exempt accommodation providers, we would emphasise that there is little evidence of regulatory failure outside of the sub-sector comprising non-commissioned short-term support. The new enforcement powers, including £30,000 fines (in line with HMO licences) are currently being consulted on by MHCLG. In theory, this will give local authorities sufficient leverage to tackle rogue landlords. However, if the implementation of the licensing scheme is not accompanied by adequate transitional funding, then the ability to utilise those powers against rogue landlords will be hampered significantly.

16.5. In our submission to MHCLG's supported housing consultation, we also urged the government to require local authorities to undertake supported housing reviews prior to implementing licensing schemes, to pinpoint which landlords are 'providers of concern' and can therefore be targeted for enforcement via a risk-based approach. Given that these providers often house those who have experienced homelessness, who may have complex needs, it is important for the local authority to mitigate them against being made homeless again.

16.6. Importantly, in our submission to the supported housing consultation, we highlighted a significant regulatory gap that could allow for the same abuses of exempt levels of housing benefit outlined in 15.2 and 15.3 above. This loophole exists within England alone and will still exist after the implementation of the SH(RO)A. Currently, a landlord can establish as a non-profit registered provider with only one unit of social housing and still be able to let multi-occupied properties that are not supported housing. This gap could be closed by only allowing dwellings of a non-profit registered provider that are social housing to be exempt from HMO licensing.^{lxx}

16.7. Following on from point 13.4, considering the poor quality dwellings created via PDR, it is worth highlighting that we have previously voiced concerns about the large number of exempt accommodation provided in such units.^{lxxi} There is no reliable data on how many such units now claim higher rates of housing benefit, and so our understanding of where these under-regulated practices overlap is lacking. Soon, local authorities will have a statutory duty to undertake a supported housing review; it would be prudent for those reviews to record what planning permission each building holds. An absence of any may denote a PDR conversion and could better establish the understanding between this type of dwelling and poor quality or rogue provision.

Ends. References follow below.

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ⁱ Health Foundation (2024) [Proportion of properties built before 1919 by local authority](#).

ⁱⁱ See <https://bills.parliament.uk/bills/3946/stages/20044/amendments/10025574>

ⁱⁱⁱ MHCLG (2025) [English Housing Survey: Chapter 1: Housing quality](#).

^{iv} MHCLG (2025) [English Housing Survey: Chapter 1: Housing quality](#).

^v MHCLG (2025) [English Housing Survey: Chapter 1: Housing quality](#).

^{vi} CIH (multiple years) [UK Housing Review](#). Individual chapters are cited individually below.

^{vii} See CIH (2025) [UK Housing Review](#), Table 23; MHCLG (2025) [English Housing Survey, Headline findings on housing quality and energy efficiency, chapter 1](#), figure 1.6. By contrast, the social rented sector is both the smallest tenure and has the smallest proportion of homes that are non-decent (10 per cent) or have a category 1 hazard (4.2 per cent).

^{viii} MHCLG (2025) [English Housing Survey 2023 to 2024: drivers and impacts of housing quality](#), Table 2.1. It is also worth noting that over one million owner occupier households (5.4 per cent) are in receipt of pension credit, universal credit, new-style JSA/ESA or an out-of-work legacy benefit. Of these around one-third have a mortgage. See DWP (2025) Stat-Xplore, Family Resources Survey dataset.

^{ix} Starting in 2002 this initiative took place across 12 sub-regional areas of housing market fragility and was directly funded. It was meant to run for 15 years but funding was abruptly ended in March 2011. Despite negative press coverage – much of it unfounded – [independent appraisals](#) were largely positive about its impact and the programme was cited by the Audit Commission as a source of good practice for urban renewal and for its balanced approach to demolition and redevelopment. Although largely targeted at areas of low demand owner occupied housing there were significant pockets of private rented housing in many of the pathfinder areas.

^x In the early 1980s around 175,000 of these grants were being approved each year; by the early 2000s this had fallen to 58,000 and was down to 41,000 in 2012/13 (with MHCLG recording ending in 2024). Expenditure in real terms (at 2024/25 prices) was around £720 million in 1990 falling to £70 million in 2012 but has had a modest recovery since. See Leather, P. (1999), *Housing benefit, licensing and poor conditions in the private rented sector*, discussion paper, Centre for Urban and Regional Studies, University of Birmingham.

^{xi} See Part 5 of the Housing Act 2004, repealed. Home Information Packs were in force between 6 April 2009 to 21 May 2010 before being abolished.

^{xii} Perry, J. and Scott, M. (2025) Dwellings, stock condition and households. In CIH (2025) [UK Housing Review](#). A [report](#) by Clarion Housing Group, based on analysis of its own data, also suggests a gradual but significant increase in the proportion of residents reporting that they have a disability, a trend they expect to continue over the next ten years (albeit more slowly).

^{xiii} MHCLG (2021) [English Housing Survey: Home adaptations report, 2019-2020](#). More [recent research](#) by CIH Scotland and partners in Scotland similarly shows that demand for adaptations will rise in the future.

^{xiv} Scott, M. (2025) Towards ‘futureproofed homes’: the implications for UK housing of a warming world. In CIH (2025) [UK Housing Review](#). According to the [UN Environment Programme](#), there remains a large possibility that eventual global warming will exceed 2°C or even 3°C, a possibility that some scientists now believe to be inevitable.

^{xv} Scott, M. (2025) Towards ‘futureproofed homes’: the implications for UK housing of a warming world. In CIH (2025) [UK Housing Review](#).

^{xvi} Climate Change Committee (2025) [Progress in adapting to climate change: 2025 report to Parliament](#).

- ^{xvii} Khosravi, M. et al. (2025) [A nation unprepared: Extreme heat and the need for adaptation in the United Kingdom](#), *Energy Research and Social Science*.
- ^{xviii} Scott, M. (2025) Towards ‘futureproofed homes’: the implications for UK housing of a warming world. In CIH (2025) [UK Housing Review](#).
- ^{xix} Scott, M. (2025) Towards ‘futureproofed homes’: the implications for UK housing of a warming world. In CIH (2025) [UK Housing Review](#).
- ^{xx} Household Reference Persons (HRPs) are defined as an individual person within a household who acts as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person.
- ^{xxi} See CIH (2024) [CIH response to the Housing Ombudsman ‘Repairing Trust’ call for evidence](#).
- ^{xxii} Resolution Foundation (2023) [Trying times: How people living in poor quality housing have fared during the cost of living crisis](#). These analyses are also corroborated by [multiple academic research reports](#), as well as the Better Social Housing Review and summaries published in the UK Housing Review.
- ^{xxiii} CIH (2025) [Submission to 2025 Spending Review](#).
- ^{xxiv} Regulator of Social Housing (2025) [2024 Global Accounts of private registered providers](#).
- ^{xxv} CIH (2025) [Submission to 2025 Spending Review](#).
- ^{xxvi} CIH (2022) [CIH response to the government’s consultation: A Decent Homes Standard in the Private Rented Sector](#).
- ^{xxvii} The Better Social Housing Review, commissioned by CIH and the National Housing Federation in 2022, reinforced that the root causes of failure often lie in systems, workforce and culture, not just the absence of standards. This is echoed in Housing Ombudsman spotlight reports, which highlight the need for early intervention, accountability and respectful, professional services. [Research](#) has also shown that resident wellbeing is shaped not just by the condition of the home, but by people’s ability to influence their environment and feel safe and valued where they live.
- ^{xxviii} CIH (2024) [Rethinking repairs and maintenance](#) project.
- ^{xxix} Regulator of Social Housing (2023) [Damp and mould in social housing - learning the lessons](#).
- ^{xxx} See for example Housing Ombudsman (2025) [Landlord failings on inspections leaving children exposed to damp and mould, as Ombudsman shares latest learning from complaints](#). For more analysis of overall investment into existing homes, see CIH (2025) [UK Housing Review](#).
- ^{xxxi} Regulator of Social Housing (2023) [Damp and mould in social housing - learning the lessons](#).
- ^{xxxii} See the analysis in CIH (2023) [A social energy tariff: the benefits of energy market reform for the social housing sector](#).
- ^{xxxiii} Recent research reinforces why action is needed. [A University of Salford study](#) with over 580 tenants found that 63% believed damp, mould or condensation had affected their health, often after years of exposure and partial or unsuccessful repair attempts. In the West Midlands, [an evaluation of the Social Housing Quality Fund](#) covering 2,444 homes found 76% of respondents felt living with damp and mould had affected their quality of life. Providers highlighted major barriers including workforce shortages, access refusals, and the volume of disrepair claims — alongside a £15.1 million annual funding gap, with grants typically covering just 2–10% of what was required. Both studies underline the urgency of intervention, but also the scale of the task.
- ^{xxxiv} See CIH (2024) [Health and Housing Insights Bank](#); CaCHE and HACT (2020) [The Impact of Social Housing: Economic, Social, Health and Wellbeing](#). The government’s [Resident Panel](#) also found that tenants value community hubs, clean shared spaces and visible landlord engagement as essential to wellbeing. [Research](#) into

the value of social tenancies further demonstrates how stable, well-managed homes support mental health, social connection and participation

^{xxxv} Undoubtedly, the consultation impact assessment is correct that if designed and implemented well, the policy will accelerate improvements that lead to reduced fuel poverty, better air quality, lower instances of damp and mould, warmer and more comfortable homes, and ultimately improved health and wellbeing.

^{xxxvi} The publication of the Clean Growth Strategy in 2017, which first suggested a target of EPC Band C by 2030 for the rented sectors, was an initial driver for this, as was the subsequent introduction of a statutory fuel poverty target (improving fuel poor homes to EPC Band C by 2030, where reasonably practicable). As a result, the proportion of social rented homes at EPC Band C or above has risen from approximately 24 per cent in 2010 to 76 per cent in 2024, according to CIH analysis of the EHS. According to the Regulator of Social Housing's [latest appraisal of sector finances](#), inward investment towards this target continues to be significant, and is included in many (but not all) provider business plans to 2030.

^{xxxvii} See CIH's [response](#) to the consultation for further detail.

^{xxxviii} In part, this concern is because we are not convinced that the modelled costs in the Impact Assessment (IA) are accurate and representative. Based on engagement we have undertaken with CIH members previously, an average cost for meeting the government's preferred approach of between £4,488-£5,292 is potentially an underestimate, especially when essential ancillary costs (such as PAS2035, which end-to-end can cost £1,000-£2,000) are factored in.

^{xxxix} [The Social Housing Resident Panel](#) could help shape this work, ensuring that residents' experience of repairs and housing conditions continues to inform national policy.

^{xl} Institute of Health Equity (2020) [Marmot Review 10 Years On](#).

^{xli} See <https://www.gmgoodlandlord.org.uk>

^{xlii} One reason why tenants may not wish to take legal action relating to unfitnes, including enhanced rights following the introduction of Awaab's Law, is the severe contraction of legal aid. Renumeration rates have been frozen since for around three decades, resulting in 'legal aid deserts' across large parts of the country, especially in rural areas. Most firms take the view that Legal Aid Agency contracts aren't economically viable, and this has to a chronic shortage of lawyers that are willing to bid for them. Even non-profit providers struggle to break even, and the Legal Aid Agency's procedures discourage new entrants because of the unrealistic expectation that their standards are fully met from the first day of the contract. We are aware that providers with a long track record who have handed back their contract when, for example, a staff member retires or leaves, since no allowance is given to train replacements without facing financial penalties. This means that once a local contract is handed back it is unlikely to be recommenced.

^{xliii} 23 December 2024, [The Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation \(England\) General Approval 2024](#). The conditions that must be met by schemes are as follows: the authority must have consulted with those affected for a period of at least ten weeks; the designated area must have a high proportion of privately rented homes; following a review of housing conditions, the authority has concluded that a significant number homes require inspection to determine whether they have category 1 or 2 hazards; there must be no practical alternative to achieve the authority's objectives for the scheme and; the authority must be satisfied that the scheme's objectives are consistent with its overall housing strategy and that the scheme assists in meeting them. See MHCLG (2024) [Selective licensing in the private rented sector: a guide for local authorities](#).

^{xliiv} Other than homes where housing benefit is claimed – although this will diminish due to the transfer to universal credit and pension credit.

^{xliv} Specifically, local authorities have a duty to take enforcement action for category 1 hazards and the discretion to take enforcement action for category 2 hazards. Enforcement action is typically through issuing an improvement notice. If the landlord fails to comply, they can be prosecuted and face an unlimited fine. In certain circumstances local authorities can also issue a civil financial penalty, a rent repayment order, a management order or (in extreme cases) a banning order. If the local authority has started enforcement, the landlord's right to possession is also restricted.

^{xlvi} Some older studies found a link between some aspects of the (pre-2004) fitness standard and the rent levels, suggesting that in high demand areas landlords may have sufficient equity to risk investment. But this just highlights the difficulty of relying on rents to prime investment in areas with modest or low demand for private renting and suggests a need for targeted funding.

^{xlvii} MHCLG (2025) [English Housing Survey 2023 to 24, drivers and impacts of housing quality](#), Chapter 1, Table 1.4: Dwellings with non-modern facilities

^{xlviii} CIH (2025) [UK Housing Review](#), tables 24a and 24c. See also the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, No. 962.

^{xlix} MHCLG (2025) [English Housing Survey: Chapter 2: Energy efficiency](#).

ⁱ See <https://www.nhqb.org.uk>

ⁱⁱ MHCLG (2024) [UK government response to the Competition and Markets Authority's \(CMA\) market study into housebuilding](#).

ⁱⁱⁱ CIH analysis of MHCLG (2025) [Energy Performance of Buildings Certificates \(EPC\) in England and Wales 2008 to 31 December 2024](#).

^{liii} Yesudas, N.M. and Scott, M. (2025) [Turning up the heat: nine discussion questions on overheating in domestic homes in the UK](#).

^{liv} Relevant building regulations or planning permissions do not fully apply to these homes (e.g. Part O), and [their quality](#) is often poor, especially in terms of ventilation, energy efficiency, excess cold and excess heat, damp and mould, and space standards. This is the case for both permanent and temporary homes, which must be of high quality and safe for all those who live in them.

^{lv} See TCPA (nd) [Healthy Homes Principles](#).

^{lvi} MHCLG (2025) [English Housing Survey: Chapter 1: Housing quality](#).

^{lvii} It should be noted that these figures present problems in understanding TA provision, in some part due to inconsistencies in HCLIC reporting but mainly due to the six categories obscuring the true variety of types of accommodation utilised. To name a few, council-owned properties, large hostels, hotels, caravans, HMOs and from stock previously available in the private rented sector to more novel solutions such as out-of-season Airbnb lets, shipping containers and modular homes. Each of these types contains its own spectrum of quality.

^{lviii} Shelter (2023) [Still Living in Limbo: Why the use of temporary accommodation must end](#).

^{lix} Another element of this has been reports from our members registered providers offering first refusal to local authorities for units they need to dispose of, for the reason of housing conditions mentioned above. Councils, knowing that TA does not need to meet such standards take on the properties. However, there is a risk to the net total of social housing supply if councils are not given resources to improve such properties if new standards are put in place.

^{lx} Even though there has been considerable effort by MHCLG to work with local authorities with high B&B usage and the latest statistics reported a welcomed drop in overall usage, data obtained by Inside Housing via FOI request reported that as of March 2025 23% of homeless households with children under 5 in England have been living in B&Bs for more than six months. In practice, this means many of these households were placed for a significant amount of time without access to cooking facilities, laundry facilities, which would significantly delay toilet training, limited floor space for play and development, overcrowding and unsuitable bedsharing.

^{lxi} Prominently, there have been no significant legislative changes comparable to those currently being undertaken via the Renter's Rights Bill and Supported Housing (Regulatory Oversight) Act 2023. In the recent MHCLG and DESNZ consultation on reforms the Energy Performance of Buildings regime, TA was not in scope.

^{lxii} It should also be noted that if a homeless household questions the suitability of a placement or has a negative outcome of a Section 208 Review, they are at risk of being deemed 'intentionally homeless.' This means that without support, homeless households are often unequipped and afraid of challenging the conditions they find themselves in.

^{lxiii} As in the instance of placements of households in B&Bs over the statutory six-week limit, it may be the case that local authorities fail to meet this legal requirement. However, the acquisition of this data will enable the department to understand the prevalence of these hazards and where resources need to be targeted to improve conditions.

^{lxiv} In the interests of protecting supply, our response also recommended that local authorities work closely with and monitor the improvement of exempt providers who meet or exceed other elements of the licence requirements but require improvement. Material conditions can be improved straightforwardly, but replicating an effective service if it ceases operating is far more difficult, damaging and costly.

^{lxv} MHCLG and DWP (2024) [Supported Housing Review 2023: Executive summary](#).

^{lxvi} For instance, in 2023 [National Audit Office \(NAO\)](#) estimated that between 2010 and 2020, available funding shrank from £1.3 billion to £350 million. In 2024, the [NHF](#) surveyed members, finding that 1 in 3 supported housing providers would have to close or reduce services in the future.

^{lxvii} The original SHIP areas received £28 million to fund their work between 2022 and 2026. The evaluation of the program's first year (2022) estimated that over £6 billion was saved in Housing Benefit spend. Additionally, in Birmingham alone it estimated a yearly saving to the NHS of £17,000 through the removal of Category 1 Hazards.

^{lxviii} The Government's most recent [review](#) of Supported Housing, published in November 2024, predicted that if current levels of delivery are maintained, around 150,000 units of new supported housing supply would be needed in England by 2040 to meet demand (mainly for older persons). However, this research did not undertake an analysis of the stock conditions of Supported Housing, (there is none such national analysis) which means that this estimate did not take into account the levels of remediation necessary to improve material conditions of existing accommodation and how the cost of such work may lead to loss of overall supply in the future.

^{lxix} Centre for Homelessness Impact (2024) [Temporary accommodation in England: is it value for money?](#)

^{lxx} Those properties fall outside of HMO and consumer regulation; however, they will still count as social rent properties for the sake of universal credit and housing benefit. The guidance on universal credit states that lettings that fall under the social rent rules should not normally be referred to the rent officer unless they are more than £50 per week (£216 per month) above the [Local Housing Allowance \(LHA\) rate](#). Even if these properties are let at shared accommodation LHA rate, the financial returns can still be substantial. Unlike licensed HMOs the only rules limiting occupancy is the [overcrowding legislation](#). Most single person households are not affected by the benefit cap until the rent exceeds £829 per month (in London, £1013 per month) or are exempt from the cap if they receive a disability benefit. In many areas this means a bad faith actor could exploit this regulatory gap by registering as a non-profit provider and undercut a bona fide private landlord who is complying with HMO licensing.

^{lxxi} CIH (2023) [Chartered Institute of Housing response to the consultation on additional flexibilities to support housing delivery](#).