

Royal Institute of British Architects

Department for Levelling up, Housing and Communities: A Decent Homes Standard in the private rented sector: consultation October 2022

The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

The RIBA welcomes the opportunity to respond to the consultation on the Decent Homes Standard in the private rented sector (PRS).

We welcome the introduction and enforcement of the Decent Homes Standard in the PRS. Setting a minimum quality standard for homes represents a commitment to ensuring the wellbeing and safety of tenants.

In addition, the PRS is the most energy inefficient tenure of the domestic housing stock - costing over £6bn in energy bills in 2018 and producing greenhouse gas emissions of around 11 megatonnes of carbon dioxide (MtCO₂e) per annum. The PRS accounts for around 5 million homes in England and Wales, and around 3.2 million of these properties have an Energy Performance Certificate (EPC) rating of D or below. The PRS also accounts for a disproportionate number of fuel poor households. Introducing the Decent Homes Standard, in addition to stricter Domestic Minimum Energy Efficiency Standard (MEES) Regulations should help to improve the energy efficiency of the PRS.

Improving energy efficiency is the “no regrets” solution to the energy crisis, climate crisis, and levelling-up agenda. Energy efficiency improvements reduce household energy bills, resulting in a sustained boost to the economy and consumption through increased disposable incomes in the long term. Some regions in the UK, for example the North East and West Midlands, have both a high volume of energy inefficient homes and high levels of unemployment. Investing in energy efficiency will create jobs across the country, often in areas that need it the most – providing local jobs for local people. Retrofitting homes also improves health outcomes and is integral to reaching net zero.

Improving quality

The RIBA welcomes the proposal to change the Decent Homes Standard to remove ‘old’ so only the condition is relevant. If an element clearly meets the ‘poor condition’ requirement it should be repaired or



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replaced. Requiring a key building component in poor condition to become 'old' risks people living in low-quality homes.

From 2004 until 2007 the Government offered the opportunity for landlords to claim energy efficiency improvements against their income tax liabilities in the form of the Landlord's Energy Saving Allowance (LESA). This afforded each household up to £1,500 in costs for energy efficiency improvements to be claimed against their income tax. As part of the PRS reforms, and Decent Homes Standard, the Government should reintroduce this policy to provide extra support for landlords required to improve the energy efficiency and thermal comfort of their homes.

Enforcement

Standards are only effective if they are being enforced properly. This requires a clear enforcement process, with an emphasis on accurate results through professional expertise. This responsibility sits with local authorities. However, with local authorities severely hampered by funding and capacity constraints, enforcement is sometimes not prioritised. The Government ought to ensure that enforcement is fully funded at the local authority level.

This means either providing a central allocation of funding specifically for building enforcement capacity in local councils, or by overseeing a cost-neutral means of enforcing the standards, such as through the charging of non-compliant landlords.

Listed buildings

When considering listed buildings and those in conservation areas the RIBA suggests a considered approach. The RIBA suggests a similar approach to that for our proposals for the MEES Regulations. We support the current qualified exemption for listed buildings and those in a conservation area, which states that compliance with certain minimum energy performance requirements should not be undertaken if they would unacceptably alter their character or appearance. Listed homes, or those in a conservation area, could then apply for an exemption on the basis that undertaking improvements would "unacceptably alter their character or appearance". A similar approach could be taken for the Decent Homes Standard.