



CONSULTATION RESPONSE

Submitted: March 2026 | Contact: shannon.barber@nea.org.uk

Consultation on a Revised Decent Homes Standard by the Department for Communities

About National Energy Action

National Energy Action (NEA) is the national fuel poverty charity. We've worked across England, Wales, and Northern Ireland for over 40 years, to ensure that everyone can afford to live in a warm, healthy home.

Together with frontline practitioners, companies, regulators and governments, National Energy Action works to support vulnerable clients, raise awareness and achieve enduring change.

In Northern Ireland, we chair the [Fuel Poverty Coalition NI](#) and act as the secretariat to the [All-Party Group on Fuel Poverty](#). We advocate for policy and regulatory reforms to protect the most vulnerable, and we deliver accredited training to improve standards in energy advice.

Through the [Belfast Warm and Well Project](#), we provide advice and practical support to local people struggling to keep their homes warm.



Consultation Response

The format of the revised Decent Homes Standard

Question 1: Do you find the table user friendly and easy to navigate?

Yes.

Question 2: Do you find the table easy to understand?

Yes.

Proposals to include an extra Pillar in the revised Decent Homes Standard

Question 3: Do you agree that the extra Pillar E, "A home should be safe, secure, sustainable and promote wellbeing", should be included in the DHS?

Yes.

Question 4: Do you agree with all the elements included in Pillar E?

Yes, but we would like to see all elements of the component 'Laundry' be mandatory in the revised DHS. We are concerned that the following element has been marked as desirable:

'Homes should have sufficient provision for storing, drying and airing laundry: There should be space for storing dirty linen, provision for drying and airing washed clothes, and space for storing an ironing board. There must also be adequate ventilation and heating to reduce the risk of condensation and mould resulting from laundry.'

Drying laundry is an essential, routine household activity, that contributes to excess moisture in a property. Without adequate heating and ventilation, condensation quickly



builds up and develops into mould. This poses serious health risks for tenants. We note that ventilation and heating are already included in Pillars B and D, but given their importance, NEA NI recommends that they are also listed as mandatory here in Pillar E, rather than desirable.

Overall proposals included in the revised DHS

Question 7: Do you believe any sections within the overall revised DHS should be amended or changed?

Yes, the element on ‘Minimum Energy Efficiency Standards – Homes should achieve a minimum SAP 75 – EPC Band C’ should be made mandatory rather than desirable.

Designating Minimum Energy Efficiency Standards (MEES) as desirable means they are non-statutory and will not be formally measured or enforced. If the revised Decent Homes Standard (DHS) makes MEES for the social rented sector (SRS) optional rather than mandatory, Northern Ireland risks falling further behind other UK jurisdictions in housing standards and fuel poverty outcomes.

For example, in January 2026, England confirmed¹ new mandatory MEES for the SRS as part of its revised DHS under Criterion D on thermal comfort. All social homes must achieve EPC Band C by 2030. These standards will simultaneously reduce household energy bills, improve thermal comfort, and cut carbon emissions from the residential sector. They are supported by funding and financial incentives to assist providers with compliance, and statutory MEES targets already apply in the private rented sector.

Given these developments elsewhere, it is unclear why the introduction of MEES in Northern Ireland for the SRS would be significantly weaker. Without the statutory incentive and structured financial support, many SRS providers in NI may be unlikely to prioritise compliance with best-practice guidance on MEES.

As such, without the inclusion of a mandatory MEES of EPC band C by 2030 for all social housing homes, NEA NI will not be satisfied that the Department for

¹ GOV.UK, (2026). [*Press release: ‘Thousands more families to get warm, secure social homes’*](#).



Communities will have taken the appropriate actions for all SRS homes to reach a decent standard.

Pillars B and C: ensuring a property is in a reasonable state of repair and has reasonably modern facilities and services

Question 8: Looking at the standard in its entirety do you agree that 'reasonable' and 'reasonably' should remain in the DHS?

No, retaining 'reasonable' and 'reasonably' risks maintaining a minimalist threshold for compliance that is insufficient to capture all housing in poor condition.

The current conception of what constitutes a failure of a Standard, particularly the definition of a 'reasonable state of repair', sets a significantly high threshold before a home is seen as failing. As currently framed, key building components and homes must effectively be in considerable states of disrepair before they are seen as failing (and thus before landlords are obliged to act). This risks tenants living in homes with key building components in poor condition, which could have serious implications, including impacts on energy efficiency and thermal comfort, as building components determine how well insulated a home is.

NEA NI therefore recommends that the revised DHS adapts definitions to reflect the effect that damage and deterioration have on residents, including the impact on domestic energy efficiency.

Question 9: Do you agree that the 'age' requirement should remain in the DHS? If no, please explain why you believe the 'age' requirement should be removed from the DHS?

No, compliance with the Standard should be determined by the condition and performance of components, not their 'age'.

Currently, a property fails the DHS standard only where a key building component is both old and in poor condition. This means that tenants may be living with building



components in poor condition that are not recognised as failing standards simply because they have not reached their expected ‘age’. If components fail or cease to work effectively before their expected lifespan, they may not trigger action under the current approach. However, age alone does not reflect the actual condition and performance of building components.

NEA NI therefore recommends that the ‘age’ requirement is removed, such that only the condition of the building component is relevant, to avoid tenants living in homes with building components in poor condition and yet not deemed old enough to constitute disrepair.

Question 10: Do you agree that the key components list should be updated to include the additional components listed below?

	Yes	No
Ventilation	✓	
Damp and mould	✓	
Heating system inspection	✓	
Fire safety	✓	
Fire risk assessments	✓	
Carbon monoxide	✓	
Lifts	✓	

Question 13: Do you agree that the timeframes for repairs and maintenance, (emergency, urgent and routine), should also be included in the DHS?

Yes.

Question 14: Do you agree the proposals in relation to repairs and maintenance, which includes dealing with damp and mould, as outlined below, are an appropriate and proportionate response for Northern Ireland?



Yes, and we strongly recommend full alignment with Awaab’s Law, including clear, enforceable statutory timeframes.

NEA NI supports the introduction of robust timeframes for investigating and resolving damp and mould hazards, at least equivalent to those introduced under Awaab’s Law in England.

Awaab’s Law is essential to the protection of fuel poor and vulnerable households in the social housing sector by ensuring that issues of condensation, poor ventilation, low energy efficiency and cold indoor temperatures are addressed with a sensible timeframe.

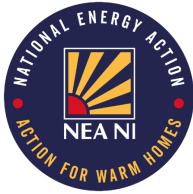
Damp and mould are not minor maintenance issues. They are serious public health hazards linked to:

- Respiratory illness, including asthma
- Increased hospital admissions
- Poor mental health outcomes
- Developmental impacts on children

Fuel poor households are particularly vulnerable. Low incomes, high energy costs and poor energy efficiency combine to create homes that are cold, damp and expensive to heat. [Analysis](#) of the **2016** House Condition Survey dataset indicates that there were **approximately 54,000 children aged 15 or younger living in fuel poor households** in Northern Ireland. (More up-to-date official figures are not yet publicly available.)

It is important to note that Awaab’s Law explicitly challenges the narrative that damp and mould are caused by tenant “lifestyle choices”. Activities such as cooking, showering and drying clothes are normal household behaviours. Where homes lack adequate insulation, ventilation or heating systems, condensation and mould growth are predictable structural outcomes. For households in fuel poverty, the inability to afford adequate heating can further exacerbate condensation and damp conditions.

[Polling](#) commissioned by NEA NI (September 2025) showed that damp and mould are a widespread issue. 43% of poll respondents reported their home had ever been impacted by damp and mould, rising to 78% among those living in social housing. This demonstrates the scale of the problem in Northern Ireland.



Given this prevalence, a discretionary or guidance-based approach would be insufficient. Statutory timeframes for investigation, written responses and completion of repairs are necessary to provide clarity, accountability and consistency. Full alignment with Awaab’s Law would ensure parity of protection for social tenants in Northern Ireland and avoid creating a two-tier system of tenant safety across the UK.

Pillars D: providing a reasonable degree of thermal comfort

Question 15: Do you agree that including the new recommendations listed below, will enhance the thermal comfort within a property?

	Yes	No
Roof, loft and wall insulation	✓	
Hot water cylinder insulation	✓	
Draught proofing	✓	
Heating controls	✓	
Replacement glazing (Window and doors if inefficient)	✓	
Install or upgrade inefficient heating systems	✓	
Functional and adequate ventilation	✓	

Energy Efficiency Ratings

Question 17: Given the level of uncertainty due to the continually evolving EPC reforms, do you agree that setting a minimum EPC band C rating should be a recommendation and not mandatory for all social housing homes?



No, achieving a minimum EPC band C by 2030 should be mandatory for all social housing homes. Minimum Energy Efficiency Standards (MEES) are needed to improve energy efficiency and thermal comfort, facilitate a fair and just transition, and reduce fuel poverty and carbon emissions.

It is not satisfactory to delay the introduction of mandatory MEES due to EPC reforms being considered in England, especially when MEES already apply elsewhere in the UK. As acknowledged in this consultation, Northern Ireland's current DHS falls below that of other jurisdictions. Making EPC Band C merely desirable rather than mandatory risks Northern Ireland falling even further behind in housing standards and fuel poverty outcomes.

In January 2026, England confirmed mandatory MEES for the social rented sector (SRS), as part of its revised DHS criterion D on thermal comfort. All social homes must achieve EPC Band C by 2030. The UK Government has also announced a series of measures to give new funding and financial incentives to SRS providers to meet the revised standards. MEES also apply to the Private Rented Sector (PRS) in England.

A desirable standard is non-statutory and unenforceable. Without a statutory incentive and structured financial support, many providers may not prioritise achieving best-practice guidance on MEES. This risks a high proportion of social homes continuing to fall below adequate energy efficiency standards, and many low-income households continuing to live in properties with low and / or deficient energy efficiency.

The Department's own Warm Healthy Homes Strategy 2026-2036 includes the commitment to introduce MEES for the private rented sector². It would be inconsistent and inequitable to apply mandatory standards in the PRS while applying weaker, non-mandatory standards in the social rented sector. There is already disparity in average EPC ratings within the SRS itself, between housing association properties and Northern Ireland Housing Executive properties, as outlined in the consultation document. Mandatory MEES would help provide consistency and equality across providers and the tenure.

² Northern Ireland Executive, (2026). *'Warm Healthy Homes 2026-2036: A new Fuel Poverty Strategy for Northern Ireland'*, pp. 20.



Furthermore, the Executive’s Housing Supply Strategy 2024-2039 also states putting in place MEES for the PRS is “part of a wider Executive policy to set MEES for all domestic tenure types”.³ The revised DHS should align with this commitment, not dilute it.

In short, if the revised DHS does not include a mandatory MEES of EPC band C by 2030 for all social housing homes, NEA NI will not be satisfied that the Department for Communities will have taken the appropriate actions for all social housing homes to reach a decent standard.

Question 18: Do you agree with the recommendation in the revised DHS, that social housing properties should achieve an EPC band C by 2030?

Yes. This should be mandatory for all social housing properties.

Question 19: Would you suggest any amendments and/or additions to the recommended energy efficiency measures as listed below?

Yes. We also recommend that due consideration is given to ensuring all upgraded devices are smart ready.

Northern Ireland should follow the same standards for devices such as EV smart charge points, heat pumps, storage heaters and electric hot water cylinders as those being introduced in Great Britain under Part 9 of the Energy Act 2023 and the Smart Secure Electricity Systems programme (the smart mandate).

In Great Britain these requirements are being set through secondary legislation. In scope devices must be smart ready, which means they have communications capability, can be remotely controlled, and meet specified interoperability and security requirements.

Devices must be able to operate in response to signals from any authorised or licensed load controller or flexibility service provider, which prevents consumers being locked into a single supplier.

³ Northern Ireland Executive, (2024). *'Housing Supply Strategy 2024 – 2039'*, pp. 35.



Aligning Northern Ireland with the Great Britain framework would help ensure Northern Ireland does not become a market for non-smart or non-interoperable devices.

Question 20: What are the main challenges/barriers that would prevent a property achieving an EPC band C rating? Please tick all boxes that apply.

	Access to property
	Age of property
	Listed buildings
	Size of property
	Cost of works (please comment on any data you have in relation to cost)
✓	Other

While there are challenges associated with upgrading properties to an EPC band C, these should not be interpreted as reasons to weaken or delay the ambition of the standard. Improving properties to at least a minimum energy efficiency standard remains critical in tackling fuel poverty, reducing energy costs for households, and improving health and housing outcomes. Instead, these challenges highlight the need for appropriate support mechanisms, policy design, and enforcement to ensure successful implementation.

Several challenges need to be addressed to ensure the success of MEES in alleviating fuel poverty:

- **Landlord resistance:**
 - **Cost concerns:** Landlords may resist or be unable to afford adhering to these new standards without adequate support or incentives – as seen by the minimal landlord uptake of the current Affordable Warmth Scheme. A low interest loan scheme, similar to Scotland’s PRS Landlord Loan scheme, could support compliance. NEA NI recommends that information about available sources of funding for upgrades to ensure housing meets the revised Decent Homes Standard should be proactively provided to landlords.



- **Enforcement gaps:** Integrating MEES into the Landlord Registration Scheme and strengthening enforcement mechanisms. Rent Smart Wales⁴ is a good example of how government can aid and manage enforcement.
- **Damp and mould issues:** Addressing both tenant behaviour and property infrastructure is critical. Education for landlords and tenants on managing ventilation and moisture is needed.
- **Rental price increases:** Landlords may seek to pass on the costs of improvements to tenants, exacerbating affordability issues. A grace period – such as in the case in NISEP, but longer (minimum 1 year) - could mitigate this risk.
- **Tenant displacement:** Where possible, energy efficiency upgrades should not lead to tenant displacement. Options like phased upgrades, temporary accommodation, or allowing tenants to remain in situ during improvements should be considered.

Dramatically improving domestic energy efficiency levels provides the most enduring solution to addressing energy affordability. Whilst other actions to boost incomes and tackle energy prices are still required, ensuring that homes meet an adequate level of energy efficiency is particularly important for reducing fuel poverty.

Climate Change

Question 22: Do you agree that housing providers should put provisions in place to minimise the risk of the following?

	Yes	No
Flooding	✓	
Overheating	✓	

⁴ “Rent Smart Wales assists those who let or manage rental properties in Wales to comply with their Housing (Wales) Act 2014 obligations and provides advice on renting out safe and healthy homes. We also process landlord registrations, grant licences and deliver informative and relevant training for those involved in the rental market both online and in classroom venues across Wales.” For more information see: <https://rentsmart.gov.wales/en/home/>.



Tenant Engagement

Question 24: Do you agree it is crucial for both tenant and housing providers to engage and actively collaborate to achieve and maintain a decent home?

Yes.