

ARCH and NFA submission to Decent Homes Review: Criterion (b) reasonable state of repair

Introduction

The National Federation of ALMOs (NFA) and the Association of Retained Council Housing (ARCH) are core participants of the Decent Homes Review Sounding Board. This joint submission supplements our comments at the Sounding Board meeting on 13 April, drawing on a meeting of representatives from our member organisations held on 14 April.

1 Building Components

Q1A: Is the list of building components complete, or are there omissions or inconsistencies, taking account of new technologies and materials and present-day expectations on quality and decency?

The list of components reflects the intention when it was introduced that the Standard should apply to dwellings and not to the common parts of blocks of flats or to external areas. Hence lifts are explicitly excluded from the list of components despite their obvious importance to residents' living conditions. We believe the scope of the Standard should now be widened to include these areas, which would bring additional components into the scope of the Standard. Since the introduction of the DHS new components have been introduced to homes in the social housing sector, for example new heating systems such as air source heat pumps as well as PV and this trend should start to increase over the coming years. There is therefore a need to update the language to include various heating systems not just gas boilers. Many social landlords have also started to install sprinklers in tower blocks and where they are fitted, they should be included in the DHS.

Although the current list of components is broadly drafted, the definitions of 'poor condition' appears to have been drawn up on the assumption that dwellings are of traditional construction - for example the definitions relating to 'wall structure' and 'wall finish' may not be appropriate in relation to buildings constructed from concrete panels. Given the improvement in local authority stock condition data in the last two decades, we believe there is probably room for a more flexible and locally variable system that takes greater account of the characteristics of particular component technologies and local experience. If a broad-brush approach giving each component type a generic lifetime

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continues to be used, however, there is no obvious argument for revisiting the current lifetimes except to comment that the life expectancy of heating systems is in future more likely to be driven by obsolescence or carbon reduction considerations than their operational lifetime as is specified under this criterion.

Q1B Is it useful to differentiate between 'key' and 'other' building components?

We note that the reason for differentiating between 'key' and 'other' building components was originally to distinguish components whose failure could compromise the structural integrity of a dwelling from others whose failure would not have such repercussions. However, the only 'other' components currently specified are kitchens and bathrooms. This implies that a dwelling is currently capable of being judged decent despite having either a kitchen or bathroom in need of major repairs indefinitely. We believe it is time to raise the standard to require both kitchen and bathroom to be in a good state of repair, whether or not the distinction between 'key' and other components is retained.

Q1C Does clustering of two or more non-serious issues rendering a home non-decent remain a useful and valid approach?

As argued above, we think not.

2 Aged elements

Q2A Is it right that 'age' is a consideration when considering issues around decency and disrepair?

In general, component age is the only information available to the landlord for use in maintenance planning and it is reasonable that landlords should be expected to plan and fund cyclical maintenance on the assumption that components, on average, reach the end of their useful life after a specified period. However, component performance will vary around the average and some may remain in good working condition for longer than expected. Equally, some will fail before the end of their expected life. Residents will often have better information than their landlord on the condition of components in their home, just because they live in it. They will often be able to tell whether a component is in poor condition, as defined in the Standard, regardless of its age.

There is a case for amending the criterion to make it clear that "a reasonable state of repair" means what most residents would assume it already means; that is, whether the building components are in a reasonable state of repair regardless of their age. The expectations relating to age could be better

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expressed as expectations on the landlord's processes for planning replacement of components on an appropriate cycle.

Q2B Is it valid and useful for the standard to provide and set out component lifetimes?

In line with the argument developed above, whether or not they are formally part of the Standard, it is reasonable for there to be a view agreed between landlords, Government and the Regulator on the average lifetime of specified components, and for the Regulator to use these to judge how well prepared landlords are to meet the future maintenance needs of their stock.

Also, as argued earlier, we would like to explore further how far it might be possible to develop a more locally-flexible approach to judging component lifetimes which is more closely based on the performance characteristics of the components actually used.

Q2C Taking into account advances in new technology, do you think the component lifetimes need refreshing or updating?

See answer to previous question.

3. Poor Condition

Q3A Is the prescribed approach to identifying building component in poor condition useful or is there scope for greater local discretion?

We have argued above that would there is scope for greater local discretion.

4. Looking forward

The main area where amendments are needed is in relation to components not currently within the scope of the Standard because they are not within the dwelling.

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