

## **ARCH and NFA submission to Decent Homes Review: Criterion (d) Thermal Comfort**

### **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 8 September, drawing on a meeting of representatives from our member organisations held on 15 September.

### **Q1: To what extent are the current requirements for efficient heating and effective insulation requirements out of date?**

The list of 'efficient' heating systems included in the DHS is clearly out of date in that it does not include new technologies such as air and ground source heat pumps, and many landlords are now working to higher levels of insulation than those currently deemed 'appropriate', in line with current Building Regulations. But, more fundamentally, the current requirements of the DHS are superseded by the Government's commitment to net zero by 2050, and the associated ambition to raise all social housing to EPC Band C or better by 2030. It is arguable that a DHS no longer needs to list 'efficient' heating systems or appropriate levels of insulation but should focus on outcomes as measured by thermal efficiency and carbon emissions. If so, what is needed is not so much a new DHS as an implementation plan and timetable for taking social housing to net zero, which goes beyond the current expectations for achievement by 2030 to specify targets for achievement in the following decade and beyond.

### **Q2 What could the DHS say to address fuel poverty and support the government's net-zero ambitions?**

As argued above, there are good reasons for focusing an updated DHS on the thermal efficiency of a home, by which we mean the quantity of energy needed to maintain a home within an acceptable temperature range. Improving thermal efficiency helps to address fuel poverty by reducing the amount of energy residents need to buy, but it cannot reduce energy bills to nil, or substitute for any inadequacies of the welfare benefits system that leave residents in fuel poverty even in relatively thermally efficient homes. However, the achievement of net zero also means switching from gas and oil heating

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systems to low carbon alternatives which, although more efficient in their use of energy, do not result in lower fuel bills because, at least currently, gas is so much cheaper a source of energy.

There is a complex balance to be struck in making progress towards net zero in social housing. BEIS currently champions a 'fabric first' approach that focuses on the improvement of thermal efficiency; the bidding guidance for Wave 1 of the SHDF makes it clear that most bids are not expected to include proposals for installation of low carbon heating. Yet social housing arguably provides the best available test-bed for developing the technology and skills necessary to deliver low carbon heating at scale, and reduce unit costs, which points to the need for a significant part, even if not a majority of the programme, to include replacement of heating systems with low carbon alternatives. Conversely, since the expected life of a gas boiler (which heat 80% of the social housing stock) is 15 years, there will be a significant number of homes for which, for the next five years at least, a new, more efficient gas boiler is the most appropriate option.

The risk in the 'fabric first' approach is that, if switching heating system is tackled as a separate intervention to be undertaken some years after energy efficiency improvements, it may be resisted by residents who do not believe that it brings any benefits, since it involves both potentially higher costs, a less controllable source of heat and a range of behavioural changes.

### **Q3 What could the Decent Homes Standard say about interventions to prevent overheating in existing social homes?**

Overheating should be regarded as being just as unacceptable as underheating, and the new DHS should include requirements both in relation to the prevention of solar overheating (blinds, etc.) and adequate ventilation, which is important not just in relation to overheating but also damp and mould problems driven by condensation.

### **Q4 What could the Decent Homes Standard say about water efficiency measures?**

In principle we would support the inclusion of water efficiency requirements in a revised standard. However, the choice between a bath and shower (especially where this involves the provision of a shower but no bath) is one on which residents have differing views, and other improvements in the efficient use of water are heavily dependent on residents' behaviour. Many landlords have installed combi boilers that do not require hot water cylinders, and there may be problems finding the space to reinstall these.

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**Q5 What could the Decent Homes Standard say about measures that could build resilience to extreme weather conditions?**

Overheating is covered by question 3 above. We would be willing to see a new DHS include other requirements that would help improve resilience to wind, rain, and flooding.

**Q6 What role could the Decent Homes Standard play in encouraging environmentally sustainable behaviours?**

The text preceding this question focuses on behaviour outside the home - use of sustainable transport, recycling and composting. We are happy to explore what landlords might be expected to do to enable and encourage environmentally sustainable behaviours of these kinds. By *enabling* such behaviours we mean steps like providing charging points for electric cars, cycle stores and appropriate facilities for sorting, recycling and composting different types of waste. As we see it, *'encouraging'* goes a bit further and implies incentivising sustainable behaviours in one way or another; we are less clear what action might be required under this description and if this is something government is minded to include in a revised DHS would need further discussion.

We also believe this raises another, more important issue relating to behaviour within the home. Using the distinction just proposed, we would argue that most of the improvements discussed in this submission would enable more environmentally sustainable behaviours but fall short of actively encouraging them. Efficient use of low carbon heating systems such as a heat pumps relies on a range of behavioural changes, such as replacing a 'heat when needed' approach to greater use of pre-heating or 'always on' systems. Where ventilation is provided to counteract the tendency of better-insulated dwellings to aggravate damp and condensation problems, residents will need to be dissuaded from blocking it. Installation of water-efficient taps and showers will not deliver their full potential in reducing water use unless residents use them appropriately. It is already clear from the current discussion on building safety that making sure that homes are safe from fire and structural risks cannot be achieved by landlords' actions alone but depends on residents meeting their responsibilities to ensure their homes remain safe.

We believe that this idea is worthy of further discussion in the next phase of the review should Ministers agree to that. A similar principle could be applied to a new Decent Homes Standard so that rather than seeing the DHS as a set of minimum standards applying to the bricks and mortar and internal amenities of a home, it could be envisaged as more like a set of rights that residents should expect to be able to enjoy, matched by a set of responsibilities.

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