

Southern Housing consultation response

15 August 2025

Housing, Communities and Local Government Committee inquiry into Housing Conditions in England

1. Southern Housing is one of the largest housing providers in the UK with around 80,000 homes across London, the South East, the Isle of Wight and the Midlands, giving over 167,000 people somewhere affordable to call their own.
2. The Housing, Communities and Local Government (HCLG) Committee has launched a new inquiry examining housing conditions in England, looking at the prevalence of hazards such as damp and mould in the social housing and private rented sectors, and scrutinising how effective policies to improve housing conditions are likely to be.
3. We're pleased to respond to the inquiry but it's useful to bear in mind that government are still consulting on many of the issues the Committee is asking questions on. Our positions and that of the sector are likely to be fully captured only when ongoing government consultations conclude.

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

4. The most recent edition of the English Housing Survey ([2023](#)) shows that fourteen per cent of all homes, around 3.5 million households, fail to meet the Decent Homes Standard. In the rented sector, the problem is worse: 21% of are classed as non-decent compared to 10% in the social rented sector.
5. The survey also reports that damp affects 9% of private rented homes and 7% of social rented homes. Serious Category 1 hazards are present in 10% of private rented homes and 4% of social rented homes.
6. In the private rented sector this is likely to underestimate the true scale of the problem. The survey is based on a sample and depends on gaining access to properties. In the private rented sector especially, tenants may be reluctant to report issues for fear of losing their home, and inspections can be limited. As a housing association we operate under a clear regulatory framework. This has driven improvement in our sector. By contrast, the private rented sector has a patchy and under-resourced system of enforcement.
7. At Southern Housing our vision is to create communities where everyone has a safe home in a place where they're proud to live. We reinvest every penny we receive from rent, service charges and sales into delivering services to our residents, maintaining our existing homes, and building new ones. We continue to invest in improving our existing homes through greater investment regular stock condition surveys and dedicated actions to tackle damp and mould. We've committed to spending a total of £9.2 billion on repairs

and maintenance over the next 30 years to help ensure we're meeting the Decent Homes Standard.

8. Our own decent homes performance is substantially better than that of the social rented sector as a whole: 99.6% for 2024/25. Our damp and mould numbers over the last few years are broadly in line with the EHS data. Our Resident Scrutiny Panel examined residents' experiences with damp and mould and analysed current systems and process. They also reviewed the Southern Housing Action Plan for Damp and Mould, suggesting improvements. We've created a specialist damp and mould team with the skills and resources to respond quickly. We've improved the way we communicate with residents, making it easier to report problems and track progress. We also provide clear, accessible self-help resources - including short videos - to help residents identify early signs of problems and take simple steps to prevent them from getting worse. These measures have helped us to resolve issues faster, reduce repeat problems, and build trust with residents.
9. The first priority for improving housing quality must be to enforce the standards that already exist across both social and private rented housing. Standards only make a difference when they are enforced.

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

10. The Government is currently consulting on reforms to the Decent Homes Standards. As such, while we very much welcome the opportunity to respond to the Committee's inquiry, while the sector continues to analyse the impact of the proposals it's not possible yet to share a detailed or technical assessment of the proposals as this process is still underway by the sector.
11. Broadly though, the reforms should deliver meaningful improvements to conditions as compliance with the enhanced standards will become a regulatory prerequisite. This mandatory framework creates a clear baseline that all social housing providers must meet, ensuring more consistent quality across the sector. The decision to align standards between the private and social rented sectors is particularly welcome, creating consistency in housing quality expectations regardless of tenure type. The Government consultation's associated Impact Assessment estimates full compliance would mean housing conditions improve for 2.4-2.5 million households in the private rented sector and 1.7 million households in the social rented sector, overall benefiting more than 9 million individuals.
12. However, the effectiveness will vary, with some elements of the proposed standards likely to be more impactful than others in addressing the most pressing housing quality issues due to implementation issues.

13. The high costs of compliance per home are a concern, and we believe government's impact assessment likely underestimates the true financial burden on housing providers. Government estimates additional compliance costs associated with moving to a new, higher standard are estimated in 2019 prices at £836 million for the social rented sector. We'd have preferred to see an estimate using 2024/25 prices given the highly inflationary environment we're operating in.
14. Several aspects of the proposed reforms require further clarification before their full impact can be assessed. The scope of certain proposed changes remains unclear, making it difficult for providers to plan and budget effectively. Without greater certainty around implementation timelines, specific requirements, and transition arrangements, housing providers cannot adequately prepare for compliance.
15. The social housing sector is already under considerable financial stress, and the substantial costs associated with bringing existing stock up to the new standards could divert resources away from new development programs. The combined effect of the several new and additional regulatory and legislative changes will mean the sector won't be able to deliver on the new homes programme. Given the urgent need for additional social housing, there is a real risk that the sector will struggle to balance compliance costs with new home delivery targets.

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

16. Compliance is measured based on different standards of stock condition information. We agree with aiming for 100% of homes having a "through the door" stock condition survey at least every 5 years but this standard is not yet being met by all. The latest official statistical data on stock owned and managed by private registered providers (PRPs) in England ([published Oct 2024](#)) documents that nearly 90% of providers undertook substantive stock conditions surveys in the year to 31 March 2024.
17. Across England, the percentage of low-cost rental units owned which failed the DHS was 0.5%. At Southern Housing, it was 0.3%. The proportion of stock identified as failing to meet DHS varied significantly between PRPs, with 50 (25%) reporting no units as failing and eight (3%) reporting more than 20% of their stock as failing.
18. PRPs also report having completed remediation work on over 37,000 (1.5%) and having lost from their stock nearly 2,000 non-decent units (0.1%).
19. The DHS allows for some units to be excluded from the requirements or reporting of DHS compliance due to specific circumstances (see DHS guidance 2006). Considering those which are excluded, the majority (86% or 8,977 units) are excluded as the tenant

has refused remediation works. This is the case at Southern Housing. Resident refusal is just one of many barriers to compliance.

20. Compliance has been a key area of focus of the inspections from RSH with many PRPs recently being criticised and downgraded for not complying or not knowing their homes. The key issue here is not the lack of regulations, but more so about standardised methodologies and clarity for measuring compliance, compounded by rent reductions and caps and lack of funding for improvements. We believe the initial deadlines should be pushed back to 2037 to avoid widespread non-compliance.

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?

21. Southern Housing supports raising professional standards across the sector. Our residents deserve a high-quality, consistently professional service. The new Competence and Conduct Standard must focus on the right skills and qualifications, those that will make a real difference to residents. It should not direct time and money towards qualifications that add little value.
22. Our response to government's consultation last April highlighted the skills we don't think staff need a qualification for, like collaborative working. And we made the case for further clarification on what constitutes 'housing management', to make it clearer who's into scope. We also set out concerns about the viability of the qualification requirements, when it seems few of the courses on offer today meet them.
23. Experience, internal training and working closely with residents and colleagues can develop skills such as collaboration and professional judgement. These soft skills are important, but do not always require a formal qualification. Making them mandatory risks taking investment away from essential technical skills.
24. It is our experience that the sector faces a shortage of qualified surveyors and asset management specialists. If the Regulator wishes to audit staff qualifications and lead a large-scale training programme, it should prioritise technical expertise:
 - Housing management: CIH qualifications
 - Technical and asset management: RICS or CIOB qualifications
 - Leasehold management: Property Institute or IRPM qualifications
25. Staff in technical roles, such as repairs, fire safety and engineering, need specialist qualifications such as Higher National Certificates or Diplomas in building studies, with the option to progress to chartered status. A single, general qualification is not suitable for all roles.

26. We recommend flexible ways to demonstrate competence. An accreditation of prior learning route could help experienced colleagues meet requirements without lengthy study. Apprenticeships are valuable, but the extra time and costs involved, including providing cover for staff away on study, must be recognised. Where Ofqual-regulated qualifications exist outside of CIH, they should be accepted as meeting the standard.
27. The standard also needs greater clarity on who it applies to and what counts as housing management. Current descriptions are too broad. For example, “ensuring the needs of tenants are met” is important, but it is unlikely to appear as a specific, assessable module in a course. This will make it difficult to check whether past qualifications meet the requirement without significant administrative work.
28. Residents benefit when staff combine strong technical skills with effective communication. Weak technical skills leave issues unresolved, while poor communication leaves residents feeling ignored. Formal training and qualifications should be saved for the technical skills that the sector desperately needs. In challenging financial conditions, such as the one we face in the sector currently, budgeting for formal learning and qualifications often means prioritising those that are mandatory. In this case, if new mandatory training and qualifications focus on soft skills like “collaborative working and exercising professional judgment” then this will squeeze out technical training. For technical asset management and repairs and maintenance roles it would be far better for those in scope to study for a HNC (level 4), HND (level 5) or degree recognised by RICS or CIOB than to do the CIH level 4 or 5 exams.
29. While the generalist skills set out in section 3.2 of the government’s 2024 policy statement are important and we’d hope that SHMs and SHEs would display these skills, we find it sufficient for them to have gained these skills through experience. Technical skills should be the focus of formal qualifications, with people skills developed through mentoring, in-house learning and on-the-job experience.
30. We welcome the goal of professionalising the sector and creating clear career pathways. To be effective, the standard should avoid a single approach for all roles, focus formal qualifications on technical needs, and provide flexible options for experienced staff. A rigid system risks losing skilled colleagues, reducing recruitment from other sectors and diverting resources away from what will make the most difference to residents.

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

31. The Housing Health and Safety Rating System (HHSRS) rightfully takes a risk-based approach, covering 29 potential hazards and operates by evaluating the potential risk of harm to occupiers from their living environment, generating a numerical score that falls

into one of 10 hazard bands which are then categorised as Category 1 (serious and immediate risk) or Category 2 (less serious or urgent).

32. This binary categorisation lacks meaningful gradation, with issues such as overcrowding listed alongside more immediate physical threats. This blunt approach has proved particularly problematic in the context of Awaab's Law, where the system's inability to distinguish between different levels of urgency within categories creates challenges for prioritising remedial action appropriately.
33. Whilst we welcome the Government's intention to simplify the rating system as part of wider reforms to the Decent Homes Standard, the detail of how this will be achieved remains unclear. More critically, Awaab's Law, which takes effect in October 2025, places significant additional and specific requirements on addressing damp and mould initially, with other hazards being brought within scope over time.
34. Our concern is that government is consulting on various regulatory changes in a piecemeal fashion, with several overlapping or even contradictory requirements emerging simultaneously. There appears to be insufficient appreciation of the combined overall impact on the social housing sector from implementing multiple complex changes within a compressed timeframe.
35. The housing association sector is already grappling with the most complex operational challenges in a generation, including building safety remediation, damp and mould eradication, and retrofit programmes to meet net-zero targets. The cumulative effect of these regulatory changes will significantly strain our financial capacity and divert resources from new home delivery programmes that are essential to addressing the housing crisis.

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

36. From 27 October 2025 Awaab's Law will apply to damp and mould hazards that present a significant risk of harm ("significant hazards"), and all emergency hazards. Government refers to this as Phase 1. In 2026, the requirements will extend to also include the following significant hazards: excess cold and excess heat; falls; structural collapse; fire; electrical and explosions; and hygiene hazards. Government refers to this as Phase 2. Then in 2027, the requirements will extend to the remaining types of hazards covered by the Housing Health and Safety Rating System (HHSRS), excluding overcrowding, where they are significant hazards. Government refers to this as Phase 3.
37. Government's initial impact assessment on Awaab's Law covering (phase 1) vastly underestimated how much implementing the regulation will cost. It's since revised its estimates upwards in an updated impact assessment after acknowledging feedback from the social housing sector. We welcome this revision and are pleased to see government

take on board feedback and attempt to generate accurate and meaningful impact assessments. Their best estimate for total cost of Phase 1 is now £180.6m, of which £129.0m is attributable to additional staffing. It's likely this still underestimates the scale; government acknowledge there may be additional costs in relation to supplementary works, which they're unable to cost given limited data.

38. The simultaneous requirement for thousands of providers to dramatically increase repair and remediation activity will create severe capacity constraints in the contractor market, driving up costs and extending delivery timescales.
39. At Southern Housing, we're roughly expecting a minimum of 20% increase in staffing and works costs from the damp and mould portion of Awaab's Law (phase 1). For emergencies, it's more difficult to generate an estimate, but we expect an increase of at least £540,000 for direct costs. Costs will become clearer over time.
40. Awaab's Law could have an impact on development capacity. Government's updated impact assessment has monetised a negative benefit to society of providers spending money on speeding up repairs instead of building new supply and suggests the sector will build 400 to 800 fewer homes as a result. The bigger impact will come from the updated Decent Homes Standard and Minimum Energy Efficiency Standards, which will significantly increase compliance costs and reduce development capacity.

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

41. As with a number of areas the Committee inquiry is investigating, the Government is still consulting on Minimum Energy Efficiency Standards (MEES), and therefore the sector is still attempting to assess the impact the proposals will have. The sector is grappling with uncertainty while attempting to assess cumulative impacts in an already financially constrained environment.
42. The consultation seeks views on government's proposal to set a minimum energy efficiency standard (MEES) for socially rented homes for the first time, using new metrics that would replace the current EER methodology following EPC. However, implementation details remain undefined.
43. The revised EPC design proposes four headline metrics: fabric performance (insulation and building efficiency), heating system performance (efficiency and emissions), smart readiness (energy optimisation and system integration), and energy cost. Government's preferred approach requires properties to meet both the fabric performance metric at band C and either the heating system or smart readiness metric by 2030.

44. The absence of finalised metric definitions creates significant planning challenges for providers. It makes it difficult for the sector to accurately model compliance costs, assess current stock against future requirements, or develop reliable investment strategies.
45. Government recognises that the proposed standard will be more expensive to meet than current EPC C standards which concerns us. Without further detail, we're unable to do our own modelling at the moment to compare to our current budget, but our costs are already very high.
46. Properties that still do not meet the minimum standard after £10,000 expenditure would be exempt for a further 10 years from 2030. It's possible this creating a perverse incentive structure where substantial sums might be spent achieving temporary exemptions rather than permanent solutions. Properties requiring investment above the exemption threshold may become commercially unviable, potentially driving increased disposals from social housing stock at a time when supply is critically needed.
47. This financial uncertainty is particularly problematic given the compressed timeline to 2030. It feels very last minute to be making changes to a target due to be completed by 2030. Given delays with recent changes to the SAP methodology (RdSAP10), we're not confident there's enough time to agree new metrics, implement them in accreditation systems and modelling software, deal with data gaps, review existing plans, secure investment and complete works by 2030.
48. The simultaneous implementation of multiple regulatory changes across the sector will create severe capacity constraints in the construction and retrofit supply chain. When combined with similar requirements in the private rented sector, it's possible we'll see insufficient capacity to deliver the volume of work required within the timescales, further driving up costs and extending completion times.

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?

49. Ensuring the condition and safety of homes requires robust inspection and data systems. Given the breadth of standards housing providers are now required to meet, inspections and stock condition surveys remain vital. Every interaction with a home presents an opportunity to collect valuable condition data.
50. Landlords must have the tools to capture and upload data in real-time, ensuring it is consistently fed back into core systems for reporting, action monitoring, and planning. This requires sustained investment in mobile technology (such as apps and handheld devices), integrated reporting tools, and well-resourced asset management systems capable of handling increased demands.

51. While there are several asset management systems on the market, many require further development to accommodate the growing regulatory requirements. But customisation, to suit both the new requirements and to fit with the differing needs of providers, requires investment.
52. The ability of providers to invest in new technology has been significantly constrained by the sector's limited financial capacity in recent years. As a result, progress towards the development and adoption of innovative technologies including AI and predictive maintenance tools has been limited. Government could play a stronger role in unlocking technological innovation across the sector. This could be achieved through a dedicated grant programme or targeted financial incentives to support the uptake of digital tools and the modernisation of asset management capabilities.
53. Despite these challenges, the sector is taking significant efforts to monitor and improve stock condition. Over the last five years, providers report that they have physically inspected around 68% of their housing stock to assess compliance against the Decent Homes Standard (DHS).
54. Technology offers significant potential to make these inspections more efficient, improve data quality, and enable proactive maintenance strategies. However, to fully harness these benefits, the sector requires both improved digital infrastructure and government support to overcome current investment constraints.

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?

55. Improving the condition of non-decent homes and addressing hazards effectively requires a coordinated approach that extends beyond the housing sector alone. Many of the issues affecting residents' quality of life, such as overcrowding and limited access to health and social care services, are interconnected and contribute significantly to dissatisfaction with housing conditions.
56. The Government can play a role in fostering closer collaboration between social landlords, health providers, local authorities, and other relevant organisations that play a role in initiatives that address wider social determinants. A more integrated approach would enable better identification of residents' needs, faster intervention on hazards, and more holistic support for vulnerable households.
57. Alongside improved coordination, appropriate and sustained funding is essential. Many organisations that provide critical services to residents are under-resourced, limiting their ability to respond effectively to the complex challenges faced by social landlords and their tenants. Targeted financial support for these frontline services would help ensure timely repairs, effective hazard management, and improved resident wellbeing.