

House of Commons Housing, Communities and Local Government (HCLG) Committee Inquiry into
Housing Conditions in England
Response from Propertymark
August 2025

Background

1. Propertymark is the UK's leading professional body for estate and letting agents, property inventory service providers, commercial agents, auctioneers and valuers, comprising over 19,000 members representing over 12,800 branches. We are member-led, with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Overview

2. The Housing, Communities and Local Government Committee is holding an inquiry into the condition of homes in England. The inquiry will scrutinise how effective the UK Government's policies to improve housing conditions are likely to be and whether further reforms are needed. In particular, following the UK Government's social and affordable housing announcement on Wednesday 2 July 2025², the Committee will assess whether the UK Government's proposed reforms to the Decent Homes Standard, and the application of Awaab's Law, will improve conditions in social housing and the private rented sector and whether these reforms will impact housing supply. Propertymark has concentrated its response on two overarching themes; the private rented sector (PRS) and the condition of new build homes.

Response from Propertymark

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

3. Reflections from Propertymark members show that the general condition of homes in England are good, but statistics from the English Housing Survey do show that too many people across all housing tenures are living in homes that do not meet the Decent Homes Standard, have a serious Housing Health and Safety Rating System (HHSRS) Category 1 hazard, or have damp and mould.³
4. In 2023, 8% of all dwellings in England had at least one Category 1 hazard, which is the most serious level under the HHSRS⁴. Breaking this down by tenure reveals that the PRS had 10%, owner occupied had 8%, and social sector had 4%. Analysis from previous years indicates an

¹ <https://www.propertymark.co.uk/>

² <https://www.gov.uk/government/news/hundreds-of-thousands-to-get-secure-roof-over-their-heads>

³ <https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition/english-housing-survey-2022-to-2023-housing-quality-and-condition>

⁴ [English Housing Survey: local authority housing stock condition modelling, 2023 - main report - GOV.UK](#)

improvement, which suggests that hazards are less prevalent across all tenures. However, the most common category 1 hazards included falls on stairs (3% of all homes), excess cold (2%), falls on the level (1%), falls between levels (1%) and damp (1%.) Furthermore, 9% of PRS homes had evidence of damp and mould compared to 7% in social housing and 4% in the owner-occupied sector.

5. Feedback from members indicates that issues with property conditions are generally more acute in rural areas of England. Rural homes are twice as likely to have a category 1 hazard present than urban properties. Houses in villages and hamlets tend to be older, less energy efficient, and have higher levels of disrepair, with 26% failing to meet the Decent Homes Standard. Furthermore, our members have reported that more tenants have raised issues about damp and mould in rented property in the past 12 months, which has highlighted several factors. Firstly, damp and mould are more prevalent where internal or external elements in the property are in disrepair. This is backed up by data in the English Housing Survey, which reveals that one in five homes with external disrepair have damp, rising to one in three where internal disrepair exists. Secondly, some tenants are reluctant to use the central heating system or extractor fans because they are concerned about increasing electricity and gas costs. Thirdly, some tenants are reporting dirt on bathroom grout as mould when frequent cleaning is the only thing required. Fourthly, damp and mould are more prevalent in older properties, which often lack modern damp proofing such as cavity walls. Additionally, traditional building materials such as stone are more porous and susceptible to moisture. According to the latest data from the English Housing Survey, 31% of dwellings in the PRS were built before 1919, compared to 20% in the owner-occupied sector and just 7% in the social housing sector.

Private rented sector

Does the Renters' Rights Bill go far enough to address poor housing conditions in the private rented sector?

6. We think that the Renters' Rights Bill will make a difference in improving standards, but we do not think the Bill goes far enough to address poor housing conditions in the PRS. Whilst the introduction of a PRS Database, the Decent Homes Standard, and Awaab's Law are significant proposals that will help address poor housing conditions there are still four fundamental issues in tackling poor housing conditions that haven't been included in the legislation:
 - **Mandatory qualifications for letting agents** – currently, anyone can operate as a letting agent or managing agent in England, or an estate agent across the UK, regardless of qualifications or experience. Introducing mandatory qualifications for letting agents can help address poor housing conditions in the PRS in two ways. Firstly, letting agents will have a significant role to play in delivering the reforms contained within the Renters' Rights Bill and ensuring landlords, many of whom are not managing property full time, are compliant. There are an estimated 22,900 letting agents in England, but only around 64% of landlords use their services, despite there being over 150 laws and 300 regulations that must be met when renting out a

property.⁵ Secondly, by ensuring there is parity for renters regardless of tenure, and standards in the PRS compliment reforms in the social rented sector, where the Social Housing (Regulation) Act 2023 introduces qualifications for property managers working in social housing.⁶ In 2014, legislation was passed making provisions for the regulation of letting agents in Scotland. A recent report into letting agent qualifications and Continued Professional Development highlights the important role that professional qualifications are playing in driving up standards across the PRS. In Scotland, 87% of letting agents who have completed a qualification say it has had a positive impact on their professional capabilities.⁷

- **Compulsory property inventories, check-in and check-out reports to improve property standards as well as prevent and resolve disputes** – a professionally compiled, clear and concise inventory, coupled with interim inspections and check-in and check-out reports, can help protect the property and ensure that any deposit deductions are made in a fair way. Where there is a dispute over damage or the condition of a property a comprehensive inventory can highlight any breaches or issues, helping to hold both tenants and landlords to account. An inventory report helps to prevent disputes and can be used as evidence in case of a disagreement. It can help the landlord recover costs from a deposit or insurance, and it can help the tenant prove they weren't responsible for damage, or that the condition of the property has changed since the start of the tenancy. Furthermore, where there is a tenancy deposit dispute regarding mould, for example, much of a claim's outcome will depend on evidence. We know of one case where a letting agent initiated a dispute claim for £700 on behalf of the landlord. The landlord wanted to keep the deposit because the decoration in the flat had been damaged by mould that had occurred during the tenancy. The evidence presented to the adjudicator included the check-in and check-out reports which confirmed that deterioration did occur, and a specialist contractors report which set out the cause of the mould as a tenant lifestyle issue.
- **Introduce a statutory Code of Practice for the PRS to ensure consistent adjudication across the new landlord ombudsman and existing letting agent redress schemes** - the Renters' Rights Bill will introduce requirements for landlords to belong to a redress scheme. Currently, letting agents must belong to one of two UK Government approved redress schemes.⁸ These are The Property Ombudsman and the Property Redress Scheme. However, the redress schemes are not operating to the same criteria and adjudicating against property agents in the same way. Of the two government-approved schemes, only The Property Ombudsman has a Code of Practice that members of the scheme must comply with. This creates inconsistencies in standards for consumers. To improve consistency and set a more consistent standard of service, the UK Government must introduce a statutory Code of Practice for the PRS to ensure

⁵ <https://www.gov.uk/government/publications/renters-rights-bill-impact-assessment>

⁶ <https://www.legislation.gov.uk/ukpga/2023/36>

⁷ <https://www.mygov.scot/letting-agent-registration/training-and-qualifications>

⁸ <https://www.gov.uk/redress-scheme-estate-agencies>

adjudication across the existing redress schemes for property agents and the new ombudsman for private landlords works in the same way.

- More resources for local authorities to enforce new legislation** – the Bill places significant new regulatory and enforcement responsibilities on councils. For the measures in the Bill to be effective and ensure local authorities can tackle poor housing conditions it is vital that local authorities are properly resourced. There are three reasons why additional resources are needed. Firstly, a report from the Department for Levelling Up, Housing and Communities, published in 2022, found that several local authorities in England have extremely small Environmental Health Officer enforcement teams.⁹ The smallest was just 0.3 full-time equivalent, and under a quarter of councils had more than five full-time equivalent officers dedicated to PRS enforcement. Based on our conversations with local authorities, some councils rely on only two officers, sometimes covering multiple local authority areas. Secondly, Propertymark is also concerned that, with regards to enforcing standards, local authorities are working in silos and failing to collaborate with other councils. Further investment, collaboration, and shared resources can increase intelligence and improve standards in the PRS. Good practice examples include where the London Boroughs in Merton, Richmond upon Thames, and Wandsworth are sharing a regulatory service in environmental health. Thirdly, local authorities in England are experiencing difficulty recruiting and retaining technical staff including planning officers and environmental health officers. This is chiefly due to some local authorities losing staff to the private sector, or to neighbouring authorities who may have more advantageous terms and conditions. According to the Local Government Association Work Force Survey 2022, approximately 45% of councils have difficulty recruiting Environmental Health Officers, with vacancies in enforcement roles at around 18–21%, which significantly limits the ability to inspect and enforce housing health standards proactively.¹⁰

How effective will the introduction of the Decent Homes Standard be at improving the condition of homes in the private rented sector?

- Propertymark thinks that the introduction of the Decent Homes Standard will be broadly effective in improving the condition of homes in the PRS, but its effectiveness must be measured against three benchmarks:
 - Not overly prescriptive** – the Decent Homes Standard must be tailored to the needs of the PRS and fit the different types of property that exist. For example, the UK Government’s consultation on a reformed Decent Homes Standard for social and privately rented homes suggests that it may be mandatory for private landlords to provide floor coverings such as carpets in every room at the start of a tenancy, meet new security standards when installing new windows and doors, and install window

⁹ <https://www.gov.uk/government/publications/local-authority-enforcement-in-the-private-rented-sector-headline-report/local-authority-enforcement-in-the-private-rented-sector-headline-report>

¹⁰ <https://www.local.gov.uk/publications/2022-local-government-workforce-survey>

restrictors to prevent accidental falls from properties.¹¹ Currently, these requirements are subject to discussion between landlords, property agents, and their tenants as some of these measures may not be needed or desired by the tenant, or may be unsuitable for the property. By ensuring that the rules are flexible and focus on functionality, they can ensure property to rent is fit for purpose, there is choice and adequate housing provision in the PRS.

- **Clear and practical guidance** – is needed to support letting agents and landlords to be able to assess and evaluate the condition of property to support the practical application of the Decent Homes Standard. Members have raised concerns about determining non-serious cases of damp and mould, the emergence of ‘no win – no fee’ solicitors taking on cases of health risks, and how to deal with specific issues like excessive heat and whether this will require the installation of air conditioning. The guidance must include detailed explanations specifying acceptable levels of disrepair and best practice examples of how to identify and address hazards, as well as information about how the standard will be enforced.
- **Consistency in enforcement** - to prevent a postcode lottery of local authority enforcement, a standardised national enforcement criterion can help avoid inconsistent application. Furthermore, aligning the HHSRS with the Decent Homes Standard and streamlining processes for environmental health officers will ensure that it is enforced consistently across the country.

What impact will the introduction of the Decent Homes Standard have on landlords in the private rented sector?

8. Property agents want to see safe and secure homes across the PRS, so they welcome proposals to extend the Decent Homes Standard to the sector. Following feedback from our members we think private landlords will be mainly impacted in three ways:
 - **Creating a level playing field** - many letting agents who are managing property for landlords are already operating to professional standards. However, the new rules will mean two things. Firstly, that there are more specific parameters that need to be checked to make sure private rented property complies with the regulations and a legal framework for housing conditions. Secondly, better property conditions will help to attract good tenants and encourage them to look after them well while they are renting the property.
 - **Additional costs for improvement work** - these costs are likely to be spread in two ways. Firstly, landlords will be required to fund the property repairs needed to satisfy the new Decent Homes Standard, which could include new and ongoing costs as well as managing renovations and improvement works. Secondly, landlords will be

¹¹ <https://www.gov.uk/government/consultations/consultation-on-a-reformed-decent-homes-standard-for-social-and-privately-rented-homes>

required to check their properties against the new Decent Homes Standard to assess whether their properties meet the requirements. This will incur either a time cost to landlords who undertake the survey work themselves, or the cost of getting someone else to survey the property.

- **Planning, preparing and paying for new Energy Efficiency Standards** – the Decent Homes Standard will streamline and update thermal comfort requirements in private rented property. While Propertymark supports efforts to improve the energy efficiency of homes, it must be done in a way that effectively improves energy efficiency while ensuring minimum disruption for those involved in the PRS - targets must be realistic and achievable. As it stands, we are concerned that the proposals will cause significant disruption to tenants if landlords are unable to afford the improvements needed or are forced to remove tenants from the property while considerable alterations are made. In May 2025 one of our members, a large independent property agency based in Yorkshire and Humberside representing around 950 properties, where roughly 42% of their stock is an EPC D, said, “most of our housing stock are terraced houses. To try and successfully make these all a C rating or above, without huge disruption to tenants and significant cost to the client, is almost impossible.”

What impact would applying Awaab’s Law to the private rented sector have on landlords and will this affect housing supply in the private rented sector?

9. Propertymark supports the extension of Awaab’s Law to the PRS, and we think there are four ways in which landlords will be impacted. These are:

- **More effective property management** - landlords will need to ensure their properties are free from damp and mould. If the mould is creating a significant risk of harm, landlords will need to act within the timescales set out under Awaab’s Law. Therefore, landlords will need to conduct regular property inspections, document all the information and provide tenants with reports of investigation findings.
- **Need for greater communication** - landlords will need to work with tenants to tackle the root causes of damp and mould, such as building deficiencies, inadequate ventilation, or low indoor air temperature. This may include conversations about tenant behaviour whilst living at the property. Ultimately, landlords will need to establish clear communication channels with tenants and develop a rapid response plan should damp and mould issues need to be addressed.
- **Potential for increased costs** – we think landlords will incur additional costs in three ways. Firstly, to increase landlords’ knowledge of Awaab’s Law and the Decent Homes Standard, as well as the other changes contained in the Renters’ Rights Bill, they will likely incur a cost for additional training if self-managing the property or for using the services of a letting agent if not already doing so. Secondly, complying with proposals to raise the minimum energy efficiency standards for rented homes to help reduce

some of the conditions that make damp and mould worse. Thirdly, costs for rehousing tenants should this be required.

New-build homes

How can the Government ensure that new-build homes are as high-quality as possible?

10. The UK Government can ensure new-build homes are as high-quality as possible by doing three things:

- **A larger and skilled workforce** - the construction industry has a decreasing number of construction professionals. According to the Construction Industry Training Board (CITB) Construction Workforce Outlook for England in 2024¹², recruitment in construction continues to be challenging. From the previous year (2023), the size of England's construction workforce fell by 2.7% overall and has not recovered from previous employment levels before Covid-19. Overall, since 2019 employment in the sector has fallen by 163,000 which is particularly problematic in the East of England. This is particularly concerning as the CITB have reported that the average age of a construction worker in the UK is now over 50, and the rate of retirement is accelerating. This could further exacerbate skills shortages in the construction sector as experienced workers exit the sector and are insufficiently replaced. More must be done to support apprenticeship schemes in the construction sector and attract young people into the workforce.
- **Improving standards through building regulations for accessible homes** - the previous government pledged to build more accessible homes, however, the regulations from Approved Document M¹³ are largely optional for local authorities to implement through planning policies where they can evidence local need. Requirements M4(2), which sets a high standard of accessible homes, and M4(3), which sets a standard for wheelchair appropriate homes, are entirely optional. To meet the housing needs of people with a disability the baseline standard should be for homes to be compliant to M4(2), except for cases where this is impractical and unachievable. Furthermore, there should be a mandatory percentage of homes that meet M4(3), and this should be reflected in local planning authorities Local Plans. Under the current building regulations, requirement M(1), which sets out minimum standards to ensure people can access and use the property, is mandatory but this is largely insufficient for the needs of many people with a disability. To drive standards up and improve housing provision for people with a disability, the UK Government should collect, and make publicly available, data from every planning authority on the number of new homes built in each of the categories and requirements set out in Approved Document M.

¹² <https://www.citb.co.uk/cwo/index.html#overview>

¹³ [Access to and use of buildings: Approved Document M - GOV.UK](#)

- **Ensuring the sector is more accountable** – there are three things that can be done. Firstly, Propertymark supports mandatory developer participation in the New Homes Ombudsman Scheme, which we think will ensure consistent build standards and consumer redress.¹⁴ Currently, participation is voluntary, leaving many buyers unprotected. Requiring mandatory developer subscription would raise accountability and standards for new build homes. Secondly, developers selling new build homes should all sign up to the Consumer Code for Home Builders. The Code is important in supporting consumers because it covers every stage of the homebuyer process, from pre-contract to exchange of contract, and during occupation of the property. Under the Code, the home builder must have procedures for receiving, handling, and resolving service calls and complaints from the consumer and other purchasers. Furthermore, the Code sets out that the Home Builder should inform the consumer in writing about these procedures, and about dispute resolution arrangements operated as part of the Code.¹⁵ Thirdly, all national planning guidelines must specify design-led criteria and have strong oversight to prevent rushed, low-quality developments whilst still allowing local planning authorities a remit to determine the appropriateness of development. We also recommend national finishing standards for new builds, including guidelines on snagging resolution to enforce buildings quality and reduce defects. Fundamentally, the public is far more likely to accept large-scale house building if the quality is high and as far as possible within the character of local communities.

¹⁴ <https://nhos.org.uk/>

¹⁵ <https://consumercode.co.uk/>