Waverley Borough Council agrees with the proposed direction as it relates to affordable rent properties.

We agree that the rent standard should apply to both housing associations and local authority registered providers of social housing. This will help to create clarity, rather than having to identify exceptions for LA’s, it also prevents unintended consequences of change.

We agree with the proposal to permit registered providers to increase rents by up to CPI+1% each year. This will help to stabilise the HRA business plan and provide assurance to tenants regarding affordability calculation when setting or re-setting rents – and thus invest more confidently in innovation.

We agree that the same requirements should apply to both local authorities and private registered providers.

We think that this should be evaluated with the DWP rather than this moving in one direction and the DWP support for housing costs.

There are very few single social housing residents earning £60,000 on their own account, I would suggest that it would not be fair for such a high rent to be charged. It also rethinks the concept of ‘Affordable Rent’. Future grant should be directed either at social rent or a rent that takes into account a wider definition of affordability.

The Council supports the proposal as this enables affordable rents to be reset at 80% of the market rate on re-let. However, there needs to be a maximum on the reset rate, as there is no way of knowing what a property will fetch on the housing market. A broad agreement, provided the 80% of market rent for any given area is set or re-set to remain within the amount of 80% of the market rent at that time.

This appears to be a fair policy for existing tenants but we would ask that it not be applied to new tenants. We would be concerned about the impact on rents being raised in a way that tenants are not able to cope with.

In the past decade, housing associations have, in the past decade, began to move away from their original mission. They have for many reasons changed what they provide and have taken more market risks. Some have moved away from housing associations to associations with mixed tenure. This is not necessarily a bad thing, but it means that the concept of social housing is becoming increasingly hard to define. It is making it more difficult for the definition of social housing to be consistent. It also means that if a landlord disagrees with the definition of social housing, it is not clear how they can challenge this. It would be fairer if the definition was clear and it was not dependent on the landlord.

I think that the requirement to have a maximum rent level on re-letting to an existing tenant would be unfair. It would be better for the landlord to have the opportunity to increase rents to meet market conditions, but the maximum should be capped at a rate that is fair to tenants. A rent increase of CPI+1% per year will, in effect, amount to a 10%+ increase on present wages. If the rate of wage increase lags significantly behind formula rent, the result will be a loss of affordability in real terms.

It is too much for social housing.

We agree that the rent standard should apply to local authority registered providers from 2020.

A housing associations/private provider has a vested interest in protecting their tenants from increases in rent. Their rents will not be unexpectedly cut. The rent reduction policy introduced in 2015 caused damage to financial plans and constrained the delivery of new homes. If the Government does implement the increase of CPI+1% per year, it will reduce the chances of delivering new homes. We are already compliant.

Social rents should remain static, or be reduced.

We don’t know how much the rent would reduce. It would depend on the circumstances of the individual tenant.

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The current framework of statutory rent control (under The Social Housing Act 1985) is too weak. The handling of exemption requests from registered providers to exempt them from already too-weak rent control is too weak. Enforcement for housing associations is too poor. Many housing associations have unlawfully ‘converted’ properties to market or near-market rents. The Regulator of Social Housing is still not effectively enforcing this statutory requirement. Our organisation has applied for an exemption to enable us to increase our rents to the market rate.

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It is too much for social housing.
A stable turnover is essential to allow housing associations to plan and invest for the long term. Only with such assurance can the ambition to build more new homes be achieved.

Basildon Borough Council does not have any comments in respect of this question.

Presently the rent standard has not been enforced and providers will regularly breach guidance on rent setting. This has led to an imbalance of new affordable housing. The implementation of a minimum 10 year rent policy, as in the proposed rent standard, would enable us to deliver more housing. It would not be feasible for rents to increase by less than this, as this would seriously restrict the provision of new affordable housing and the investment in our stock and will enable us to deliver more housing. It would not be feasible for rents to increase by less than this, as this would seriously restrict the provision of new affordable housing and the

The NFA supports the approach which would enable the Regulator to intervene if the financial situation of any individual business plan, particularly in terms of the financial viability of delivering new build schemes and investment in the capital programme.

While local authorities are best placed to determine any potential impact, we support the principle of applying the rent standard to local authority registered providers from 2020. We do not agree that the rent standard should apply to local authority registered providers from 2020. One of the aims of HRA Self-Financing was to ensure that local authorities are required to sell their stock through Right to Buy and can only keep a small proportion of the stock we own, as well as a registered provider for a small number of stock we own.

The direction would protect existing tenants living in affordable rent properties whose 5 year flexible tenancy is being completed. The proposal to apply the rent standard to local authority registered providers, and that instead, the rent standard will not apply to certain categories of smaller housing associations/private registered providers (other than local authority providers) would be beneficial. The proposal to extend the rent setting period to 10 years after 2015/16 rents would increase by RPI + 0.5%. The subsequent changes to social rents (ending rent convergence a year early, the introduction of the Welfare Reform and Work Act 2016. They are also likely to be subject to the wider economic standards, which

These proposals.

But with the caveat that this is underpinned by some statutory protection, such as that which is afforded to LA authorities are required to sell their stock through Right to Buy and can only keep a small proportion of the value of the 2016/17 national HRA rent roll, which would never be recovered by individual HRAs. To correct this, the rent policy from 2020 would need to be CPI +2% for 10 years.

Yes we agree, however we believe a capped increase of CPI plus 2% should be allowed in relation to local authority rents, to address the fall in income arising from the implementation of a minimum 10 year rent policy.

Yes we agree, however we believe a capped increase of CPI plus 2% should be allowed in relation to local authority rents, to address the fall in income arising from the implementation of a minimum 10 year rent policy.

We welcome the clarity that the proposal provides for the next 5 years. We would appreciate the exploration of an optional standard for a longer period of time, ideally 30 years or at least 10 years to increase investor confidence in the long-term viability of social housing whether delivered by local authorities or Registered Providers.

No, we do not agree that the rent standard should apply to local authority registered providers from 2020. One of the aims of HRA Self-Financing was to ensure that local authorities are required to sell their stock through Right to Buy and can only keep a small proportion of the value of the 2016/17 national HRA rent roll, which would never be recovered by individual HRAs. To correct this, the rent policy from 2020 would need to be CPI +2% for 10 years.

NCC believe that there is a case for reviewing the reference to the 1999 values and earnings data in the calculation of rent setting for social housing. As stated above, there should be a level playing field between providers of social housing. However local authorities are best placed to determine any potential impact, we support the principle of applying the rent standard to local authority registered providers, and that instead, the rent standard will not apply to certain categories of smaller housing associations/private registered providers (other than local authority providers).

Abolish intermediate rents. This has developed into a key part of the sector particularly within regeneration schemes, but its legality is
I write to oppose your plan for an inflation-busting rent increase by council and housing association landlords in England for the at least 5 year period commencing April 2020 and do so for the following reasons: The proposal is perverse as the additional 1% over and above inflation adds an unnecessary 1% to the Housing Benefit (and its UC equivalent bill) that currently stands at £15.07 billion per year. In the first year, 2020, this adds a further £150.7 million cost to the taxpayer and in the hope – and nothing more than hope – that social landlords recycle this to develop new housing. Yet just 1 in 5 English housing associations actually develop new housing so the proposal gives added rent funding to all HAs yet only 20% use this for new housing. That is perverse and a chronic waste of taxpayer money. I propose an alternative which is to limit social housing rent increases to CPI only and to sweep the additional 1% you propose into a centrally held capital subsidy pot that English social landlords can bid for solely to develop new housing. This guarantees that the additional taxpayer money of £150.7 million in 2020 is used for the intended purpose. This model – that costs the exact same to government – continues each year and realises a new house building pot of £311m in 2021, £482m in 2022, £663 in 2023 and £855m in 2024. The consultation states the rent increase formula is for “at least 5 years” and so if this is continued for a further 5 years it realises a centrally held new house building pot of £1.06bn in 2025, £1.27bn in 2026 and reaches over £2bn in 2029. If continued for a further 5 years it realises a centrally held new house building pot of £1.06bn in 2025, £1.27bn in 2026 and reaches over £2bn in 2029. If continued for a further 5 years it realises a centrally held new house building pot of £1.06bn in 2025, £1.27bn in 2026 and reaches over £2bn in 2029. If continued for a further 5 years it realises a centrally held new house building pot of £1.06bn in 2025, £1.27bn in 2026 and reaches over £2bn in 2029.
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I write to oppose your plan for an inflation-busting rent increase by council and housing association landlords in England for the at least 5 year period commencing April 2020 and do so for the following reasons.

1. **Fairness and Equity**: This increase is unfair and inequitable. Rent increases should be used to reinvest in the fabric of housing and provide the most suitable approach for the local circumstances. It is therefore unreasonable to expect an informed response without providing more detail about what this will mean in practice.

2. **Local Authority Liberty**: Although the consultation suggests landlords currently have the flexibility to set rental levels, this is in practice not the case. Associations/private local authority registered associations are bound by their local authority’s housing strategy and planning rules. The principles that both Private Registered Providers and Local Authorities provide affordable housing under the same conditions should be identical, with no separation from a rent standard perspective establishing equality across social services.

3. **Inadequate Rent Standard**: The Government policy statement sets a rent standard for new build social housing to be £100 per week for a 2 bedroom property. This is well below the cost of living and does not incentivise provision of new social housing.

4. **Government Commitment**: We do. However, there is one point relating to ‘rent flexibility’ we wish to clarify. The consultation suggests landlords currently have the flexibility to set rental levels, which is not the case in practice. This is particularly true for housing associations; this statement needs clarification.

5. **Borrowing Headroom**: An identified rental increase will support housing providers borrowing for the provision of new build social housing. More flexibility should therefore be granted to local authorities to ensure the same amount of government revenue funding and it benefits tenants, government and reduces dependency enabling more tenants to take up employment opportunities as their rents become a lower proportion of their income.

6. **Housing Supply Crisis**: The supply crisis is one of many advantages to the government. This alternative prevents the supply crisis we have witnessed over many years and arrests and then will reverse the UK home ownership rate that has fallen from 71% in 2004 to 63% by 2017 and is one of many advantages to government. This alternative ensures we have the social housing and rented homes we need to build our economy and provide adequate housing for people who need it.

7. **Landlord Function**: The consultation states the rent increase formula is for "at least 5 years" and so if this continues each year and realises a new house building pot of £3.52 billion in 15 years time. On a basis of £40,000 capital subsidy per new house built the £3.2 billion in 2034 equates to around 88,000 new houses built by English social landlords and a social housing new build figure last achieved in 1981. Since 2010 all UK social landlords have built an average of 33,040 per year and this alternative use of the exact same HB/UC taxpayer cost allows the Government to provide £150.7 million in 2020 to drive new supply, placing additional pressure on our landlord function.

8. **Uninterrupted Rent**: We would highlight the following statement from the draft policy statement – ‘Properties let by registered providers are not subject to rent restrictions’. We believe this to be an error and we request clarification.

9. **Capped Affordable Rents**: Yes and we hope Government will honour its commitment for CPI+1% rent rises to endure uninterrupted for a minimum of five years from 2020. As the consultation document points out, certainty over rent increases is essential for private rental providers, who are often small businesses and rely on predictable income streams.

10. **Housing Benefit Bill**: The alternative model continues it realises a new house building pot of £1.06bn in 2025, £1.27bn in 2026 and reaches over £2bn in 2029. If continued for a further 5 years it realises a centrally held new house building pot of £3.52 billion for the year 2034 in 15 years time. On a basis of £40,000 capital subsidy per new house built the £3.2 billion in 2034 equates to around 88,000 new houses built by English social landlords and a social housing new build figure last achieved in 1981. Since 2010 all UK social landlords have built an average of 33,040 per year and this alternative use of the exact same HB/UC taxpayer cost allows the Government to provide £150.7 million in 2020 to drive new supply, placing additional pressure on our landlord function.

11. **Affordable Rental Increases**: This guarantees that the additional taxpayer money of £150.7 million in 2020 is used for the intended purpose. This model – that costs the exact same to government – continues each year and realises a new house building pot of £3.52 billion in 15 years time. On a basis of £40,000 capital subsidy per new house built the £3.2 billion in 2034 equates to around 88,000 new houses built by English social landlords and a social housing new build figure last achieved in 1981. Since 2010 all UK social landlords have built an average of 33,040 per year and this alternative use of the exact same HB/UC taxpayer cost allows the Government to provide £150.7 million in 2020 to drive new supply, placing additional pressure on our landlord function.

12. **Social Housing**: This alternative as well as delivering 166% more new housing also means government reduces the housing benefit bill by £3.52 billion per year by 2034 and realises a long-term financial benefit for government and provides tenants with greater income security and longer term certainty over rent levels.

13. **Homeownership Rate**: This alternative model has a much better chance of improving the UK homeownership rate that has fallen from 71% in 2004 to 63% by 2017 and is one of many advantages to government. This alternative prevents the supply crisis we have witnessed over many years and arrests and then will reverse the UK home ownership rate that has fallen from 71% in 2004 to 63% by 2017 and is one of many advantages to government. This alternative ensures we have the social housing and rented homes we need to build our economy and provide adequate housing for people who need it.

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15. **Dependency**: This alternative reduces the housing benefit bill by £3.52 billion per year by 2034 and realises a long-term financial benefit for government and provides tenants with greater income security and longer term certainty over rent levels.

16. **Social Rent to Affordable Rent**: We do. However, there is one point relating to ‘rent flexibility’ we wish to clarify. The consultation suggests landlords currently have the flexibility to set rental levels, which is not the case in practice. This is particularly true for housing associations; this statement needs clarification.

17. **Centralised Pot**: This alternative model has a much better chance of improving the UK homeownership rate that has fallen from 71% in 2004 to 63% by 2017 and is one of many advantages to government. This alternative prevents the supply crisis we have witnessed over many years and arrests and then will reverse the UK home ownership rate that has fallen from 71% in 2004 to 63% by 2017 and is one of many advantages to government. This alternative ensures we have the social housing and rented homes we need to build our economy and provide adequate housing for people who need it.

18. **Early Intervention**: We would like to reiterate the key point that early intervention is the key to preventing a future crisis. Without adequate rent increases and higher housing benefit rates for new social housing, we will inevitably see a crisis similar to the one we currently have, which is about to get even worse with Brexit.

19. **Affordable Housing**: An identified rental increase will support housing providers borrowing for the provision of new build social housing. This guarantees that the additional taxpayer money of £150.7 million in 2020 is used for the intended purpose. This model – that costs the exact same to government – continues each year and realises a new house building pot of £3.52 billion in 15 years time. On a basis of £40,000 capital subsidy per new house built the £3.2 billion in 2034 equates to around 88,000 new houses built by English social landlords and a social housing new build figure last achieved in 1981. Since 2010 all UK social landlords have built an average of 33,040 per year and this alternative use of the exact same HB/UC taxpayer cost allows the Government to provide £150.7 million in 2020 to drive new supply, placing additional pressure on our landlord function.
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The Fact that in reality rents are in general lower reflects many gaps between rent levels and the rules around stock sales and therefore we would ask for further flexibility to be provided to Local Authorities registered associations/private provider (or a body in higher rents (to absorb the RTB losses) in the Local Authority sector.

Social housing rent guidance for Local Authorities being broadly aligned with the rent standard for private level of affordability and protection.

Yes we agree with this, after the current differences have been removed to provide a level playing field across rental income, it is noted that this does not address the shortfall on meeting the convergence of rents which had to be abandoned in place of the rent reduction.

We welcome the recent removal of the borrowing cap and this is a positive change for Local Authorities to deliver more new homes.
The principle that rents for housing associations and local authorities should be regulated together is accepted. However, The Rent Act's rent-cutting regime.

The Relocation Act introduced the route through which many local authorities are able to charge affordable rents, i.e.; by virtue of having entered into a local authority registered housing association.

Consistency of approach for both providers of social rent properties and for customers and ensure greater transparency across the housing market.

Therefore the DCN welcomes the flexibility included within the policy statement - CPI+1% is a ceiling rather than an expectation. The policy allows social housing providers to consider local conditions and factors that influence the ability of tenants to pay rent, such as changes in household income or circumstances.

The saving on the HB bill with inflation level rent increases could be directed towards grant for councils to build new council homes. The OBR suggests this might be only 20,000 in five years. As Tory Leader of the Local Government Association, Lord Porter, has said, the last time there were 300,000 homes under construction was in 1979.

The government's housing policy aims to ensure that rents increase in line with inflation. This will help guarantee delivery. We also welcome the proposed approach to rent flexibility set out in sections 2.13 and 2.14 of the draft policy statement. However, we notice a subtle change in the way the CPI+1% formula is allowed? • 6.2: The maximum weekly rent for a new tenant is formula rent.
We support the return to similar mechanisms employed in rent policy prior to the Welfare Reform reductions.

The Almshouse Association

Applying the same requirements to local authorities and private registered providers implies that a local provider (or a body associations/private provider) follows the principles of the limit rent system in favour of a move to rent regulation.

We do not agree to the rent standard being applied to local authorities. The self-financing settlement required councils to have regard to a standard that would not apply to: • Accommodation let to a high income social tenant household; and • 'Relevant dwelling' as set out in the definition of the housing benefit bill.

Managing the risk that Government will change its rent policy after 2025 means refraining from a standard that is much more affordable to existing and future social tenants. This reduces poverty and allows social tenants to save more and save more quickly for a mortgage deposit and get on the housing ladder. It is also good for the wellbeing of tenants, landlords and a social housing new build figure last achieved in 1981. Since 2010 all UK social landlords have built an average of 33,040 per year and this alternative use of the exact same HB/UC taxpayer cost of rental income had a negative impact on our development programme and our ability to manage homelessness. Long-term security in relation to rental income is key to effective HRA business planning, and in the same amount of government revenue funding and it benefits tenants, government and reduces dependency enabling more tenants to take up employment opportunities as their rents become a lower proportion of their income.

Some providers for consistency.

This appears to be a sensible measure - we would assume that associated guidance would emphasise that whilst unique circumstances this could lead to a significant reduction in the weekly rent in 2020/21, where during 2019/20 a property has been relet at a higher weekly rent.

Our final comment relates the definition of 'specialised supported housing' set out in para 5.5 of the draft policy statement. One of the reasons: The proposal is perverse as the additional 1% over and above inflation adds an unnecessary 1% to the Housing Benefit (and its UC equivalent bill) that currently stands at £15.07 billion per year. In practice, this will mean landlords will either lose income or make cuts to the services they provide to tenants. In addition, it would lead to further pressure on social housing stock, which is already facing a significant shortfall in funding. Therefore, we welcome the proposal to permit RPs to increase rents by a maximum of CPI + 1% per annum from 2020/21, but we encourage the Government to increase the timescale of this policy commitment to 10 years, rather than the 5 set out in the draft policy statement. This would bring the approach to rent setting (and variation) into line with the current deal-based investment framework being adopted by many providers.
We don't agree because we feel that the Formula Rent calculation contained in the Rent Standard is not fit for purpose. It fails to take into account the wider social and economic impacts of setting rents, as well as the potential for negative consequences for tenants and providers.

Without this, an imbalance is created, where in theory local authority registered providers may be forced to set higher rents to absorb the costs of the Rent Standard. This would lead to a decrease in the number of homes available for social rent tenants, and an increase in the burden on tenants who are already struggling to afford their rent.

We welcome the principle of stability for social housing rents but would like to note that any additional risk to the financial sustainability of the sector, which may arise from the application of the Rent Standard, needs to be addressed.

Premier Homes is supportive of this approach, providing certainty over future rent policy underpins our confidence to build. In reality, since 2016 the Welfare Reform and Work Act has required local authority registered providers to comply with the same rent reduction policy as housing associations.

The policy removes any local flexibility in setting rents. The proposed direction states that CPI plus 1% policy should remain in place for all providers/Local Authority Registered Providers' to invest in building more new homes and providing ongoing and improved services for tenants through the ongoing maintenance and repair programme.

The impact of the Rent Standard on the housing market is also concerning. It is important to note that the Rent Standard is a financial threshold, not a social one. It is not designed to address the needs of tenants, but rather to ensure that social housing providers can remain financially viable.

However, the Rent Standard does have the potential to address some of the issues that arise from setting rents in a competitive market. For example, it can help to ensure that rents are set at a level that is affordable for tenants, while still allowing providers to cover their costs.

In conclusion, we believe that the Rent Standard is necessary for the financial sustainability of social housing providers. However, it is important that it is applied in a way that takes into account the wider social and economic impacts of setting rents. We would also like to see greater flexibility in the application of the Rent Standard, to allow providers to adapt to changing circumstances and meet the needs of their tenants.