	Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?	Are you a tenant of a registered provider of social housing (such as a housing association or a local authority)?	Q.If you are responding on behalf of an organisation, which of the following best describes you?(please tick one)		Question 1: Do you agree that the rent standard should apply to local authority registered providers from 2020?		Question 2: Do you agree that the same requirements should apply to both local authorities and private registered providers?		Question 3: Do you agree with the proposal to permit registered providers to increase rents by up to CPI+1% each year?		Question 4: Do you agree with the proposed direction as it relates to social rent properties?		Question 5: Do you agree with the proposed direction as it relates to affordable rent properties, including the proposal relating to the re-setting of affordable rent?		Question 6: Do you agree with the proposed arrangements for making exemptions from the rent standard on financial grounds?		Question 7: Do you have any other comments on the proposed direction (including the draft Policy Statement)?	
	Response	Response	Response	Other (please explain)	Response	please enter your comments here	Response	Please enter your comments here	Response	Please enter your comments here	Response	Please enter your comments here	Response	Please enter your comments here	Response	Please enter your comments here	Response	If yes please enter your comments here
1	Personal view	Yes			No	I like to start from today	Yes		Not sure - Dont know		Yes		Not sure - Don't know		Not sure - Don't know		No	
2	Personal view	Yes			No	[REDACTED]: In my opinion, by 2020 pay increases should have put most residents back to where they might have been before widely implemented pay freezes. Therefore CPI plus 1% seems reasonable. However, my concern is with benefit claimants. The social size criteria at 14% and 25% will become increasingly onerous on residents whilst benefit are frozen. If my CPI alone, it will mean a 1% increase on year for such residents. DHP (the DWP answer for everything) will not meet this shortfall longer term, and there simply isn't the properties to downsize people into. Therefore a softening of the restriction from 14% to 10% and from 25% to 20% would at least ease the burden.	Yes	There is no reason why this provision shouldn't apply equally	No	I think that increases should be pegged at CPI because many working households do not get pay increases anywhere near even the CPI rate of inflation, and if benefits are unfrozen from 2020, they will only rise with CPI inflation which will only cause further hardship. it would seem fairer to raise rents by CPI and 1%, but capped at 5%. This would ensure that if inflation took off rapidly, it would not cause hardship to low income families to the same extent it otherwise could.	Not sure - Don't know	Whilst I welcome stable predictable rents which enable RSLs and Local Authorities to plan for the future, there must also be a realisation that this will firstly have a cost implication for Housing Benefit payments/UC Housing Costs, and will hit low income households disproportionately, with the under occupied households with limited options, being hit hardest	No	Affordable rent is already grossly overstated in London. It acts as a benefit trap for the households allocated to it, and under occupied tenants whom are on low earned income find it cheaper to pay the 14% or 25% shortfall of a social rent than downsize to an "affordable" rent property. To then find that if the affordable rent is less than the formula rent then the rent increases to the higher of the two will only aggravate the situation. Affordable rents, at 80% of market rents works in conflict with Local Housing Allowance rules and the direction of travel that the DWP would like to move claimants towards. Adding to this rent level helps no-one	No	There are very few single social housing residents earning £60,000 on their own account, I would suggest that it would run into less than 100. However, earning £30,000 in full time work is not that generous in central London, and a couple earning this amount is not unusual. The proposal is likely to create more demand for housing as the increased rent could split the couple up, it could do the same for parents and adult children. So unless the real policy intention is to further fuel demand for housing, then this policy needs to be thought through again	Yes	I think that this should be evaluated with the DWP rather than this moving in one direction and the DWP support for housing costs moving in another. As much as it provides stability and balance, it has not taken into account the policy directions of the DWP
3	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	RBK understand that limit rent is unworkable under Universal Credit as the rent rebate subsidy scheme will no longer apply. RBK acknowledges the rationale for the need to change. This would benefit both Councils with housing stock and those without.	Not sure - Don't know	Broadly speaking we would agree that it would be better for both Councils and Housing Associations to have the same requirements and the same rent standard which give equity to all social housing tenants regardless of landlord.	Not sure - Dont know	Yes RBK broadly agrees with this proposal. We would also ask for some guidance as to what direction the rent setting will be at the end of these 5 years. As any rent cuts or increases need to be factored into a 30 year HRA business plan. We also note the impact of CPI plus 2% on tenants ability to pay future rents but would ask the Government to consider whether the 1% could be higher.	Not sure - Don't know	We would broadly agree with this, however in the first instance we would request details of any further cuts to funding, rents, discretionary housing payments e.t.c.	Not sure - Don't know	This appears to be a fair policy for existing tenants but we would ask that it not be applied to new tenants. We would welcome more details about the new proposal before passing further comment and would appreciate an indication of when such detail will be available.	Not sure - Don't know	This does not differ much from the current process. As long as councils have a route to make an application this is what matters. Otherwise this could affect current borrowing agreements.	No	
4	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes		Yes		Yes		Yes		No	
5	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes		Yes	We are already compliant.	Yes	We are already compliant.	No	We have not previously requested exemptions from the Rent Standard from a financial viability perspective, so this doesn't affect us.	No	
6	Personal view	Yes			Yes		Yes		Yes		Yes		Yes		Yes		No	
7	Personal view	No			Not sure - Don't know		Yes		No									
8	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes		Yes		Yes		Yes		Yes		No	
9	Organisational response		Other (please explain)	Cornwall Housing Ltd, Tenants Forum Working Group. We represent Cornwall Housing Ltd's Tenant body. Cornwall Housing is Cornwall Councils Arms Length Management Organisation. Cornwall Council has a housing stock of 10,000+ homes.	Yes	Yes, the rent standard would be broadly welcomed, with a provision that measures are put in place for Local Authority tenants currently claiming Housing Benefit, who are then migrated onto Universal Credit, thereby guaranteeing that the housing benefit element of UC will be sufficient to cover the formula rent of the LA.	Yes	Yes, this sounds fair. However, the distinction between Local Authority Secure Tenancies, offering Social Rent (among other tenures & rents) and Private RPs Assured Tenancies, offering Affordable Rents, is often overlooked, or used within an interchangeable context. The distinctions must remain explicit, whenever either term is used.	Yes	Yes, but there is a worry. This concerns the rate of wage increase, especially in areas such as Cornwall where the average wage is the lowest in the country. Over a given length of time, say 10 years, 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.	Yes	Yes. However a problem could become apparent if a rent is within the upper 5-10% margin. 10% of a monthly rent amount could make a huge difference to some tenants especially those on a low wage.	Yes	A broad agreement, provided the 80% of market rent for any given area is set or re-set to remain within the amount covered by Housing Benefit/UC housing element and does not exceed the Local Housing Allowance.	Not sure - Don't know	This exemption proposal was first put forward in section 25 of the Welfare Reform and Work Act 2016, if the regulator considered that complying with section 23 of the act would jeopardise the financial viability of the private registered provider. However, if the RP cannot comply with the requirements of the rent standard which qualify it to be an RP, then surely it ceases to be a provider of social housing.	Yes	Ww would like to see Housing Associations offering an equivalent rent of Social rent levels. One major concern is the chronic lack of homes at social rent throughout the country. In many areas there is no Local Authority housing, offering social rent with Secure Tenancies. In large swathes of the UK there are only Housing Associations with Affordable rent with Assured Tenancies. Housing Associations have, in the past decade, began to move away from their original mission. They have for many reasons changed what they offer in the way of tenancies. For those people in the low pay sector, whose earnings take them over the threshold for many benefits, the difference between social rent and affordable rent can have too many negative consequences.
10	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	We agree that the rent standard should apply to local authority registered providers from 2020.	Yes	We agree that the same requirements should apply to both local authorities and private registered providers to ensure that all social tenants receive similar levels of protection and benefits.	Yes	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 maintenance of existing stock as well as delivering new development opportunities. However, the local authorities that have been deemed areas of high affordability pressure by the additional housing revenue account borrowing programme, should have the option to increase rents by up to CPI+2% each year during the 5 year period. Local Housing Allowance rates should also be increased in line with increases in affordable and social rents.	Yes	We agree with the proposed direction relating to social rent properties in terms of rent setting. However, there should be an option for local authorities to convert social rent properties to affordable rent properties, where they have been deemed as an area of high affordability pressure by the additional housing revenue account borrowing programme.	Yes	We agree with the proposed directions relating to affordable rent properties, including that the rent should not be re-set when re-letting to the same tenant following a probationary period coming to an end. However, we disagree with the proposal that the rent cannot be increased as a result of re-letting to an existing tenant. Market rents continue to substantially increase each year in our local area and not allowing the rent to be re-set following a tenancy change, will widen the gap between private sector rents and affordable rents. There should however be protection for vulnerable tenants within any provisions. Tenants should be exempt from any provisions to increase rents on review where this would cause financial hardship for the tenant. Also, when a joint tenant becomes a sole tenant, due to relationship breakdown, the actual rent should not be increased on review. We agree that affordable rents should be re-valued when letting to a new tenant or existing tenant to ensure that rents do not exceed 80% of market rents. However, we also suggest that affordable rents should not exceed the Local Housing Allowance Rate.	Yes	We agree with the proposed arrangements for making exemptions from the rent standard if it would cause an authority unavoidable and serious financial difficulty.	No	
11	Personal view	Yes			Not sure - Don't know		Not sure - Don't know		No	My public sector pension only increases by CPI each April, therefore if my rent increases by CPI + 1% I will be worse off financially each and every year that this policy is in force. I feel rent increases should be limited to CPI only.	Not sure - Don't know		Not sure - Don't know		Not sure - Don't know		No	
12	Personal view	No			Not sure - Don't know		Not sure - Don't know		Not sure - Dont know		Not sure - Don't know		No	'Affordable' is a total misnomer. These are high rents for social landlords and can cause hardship, not least through attracting a Benefit Cap for the unemployed. From the counter viewpoint, they also increase the Housing Benefit / Universal Credit bill for the general taxpayer. As such, they are poorly thought through.	Not sure - Don't know		Yes	The matter of Supported Accommodation costs is not dealt with here because they are exempted. This matter MUST be dealt with swiftly - not put off, yet again. Investors are leasing properties to Social Providers at high-return cost (no fault of the Social Provider because what else is available?) and the general taxpayer is meeting the bill / paying these profits through extortionate Housing Benefit rates. This consultation is about how to set rents going forward, to avoid the most burning issue of Supported Accommodation rents is an egregious negligence. Local Authorities cannot risk properly challenging the high rents because of potential subsidy loss. It is up to central government to prevent profiteering from this vulnerable group by using them as tenants in extremely high rent properties where Housing Benefit must fund this greed. For a full explanation of the problem please commission HBInfo to provide a briefing paper. Having different rents for those with taxable income of £60k+ will create a large burden on Social Providers in terms of information gathering and means-testing and reacting to changes in income/occupation. If this is introduced then a Social Provider MUST (not may) react to a reduction in income and implement a lower rent. Similarly, they MUST (not may) take account of current income where necessary rather than the tax year from (in effect) two years ago.
13	Personal view	Yes			No		No		No	The stander-ed of Housing and care by my Housing association has gone down with lack of care & Maintenance to property's & grounds, The stander ed of Work has also deteriorated under the Housing association .	No		No		Yes			These Housing associations need to address there policies to every day needs of existing tenets and Housing stock, To stop there greed to make money for other privet enterprises?.
14	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Yes, Ashfield District Council believes that regulation, where possible and achievable, should be standardised across the social housing sector. This help to create clarity, rather than having to identify exceptions for LA's, it also prevents unintended consequences of change regulation in one area without appreciating the impact on the exceptions or exclusions which had been created for LAs. Mirroring policies and standards also assists in equality of service and therefore could assist tenants with comparison and mobility.	Yes	Yes, same rules, same requirements. The Rent Rebate Subsidy Limitation Scheme is an unnecessary complication for Local Authorities which makes it harder for the Housing Service to focus on its Business Plan and services to tenants without referencing other departments and policies.										
15	Personal view	Yes			No	social rents should remain static, or be reduced	No	LA rents should be static, or reduced	No	It is too much for social housing	No	There should be NO "high income social tenants" in rented social housing - that is abominal and disgusting! They can afford to rent privately and should pay the market rate, or ideally be evicted. Only low/no no income people should live in social housing. It states that "affordable" social rent is 80% of the market rate - this is too high - 80% is NOT affordable at today's rent levels and financially disadvantaged people should be renting at 50% market value at the very most.	No	There should be NO "high income social tenants" in rented social housing - that is abominal and disgusting! They can afford to rent privately and should pay the market rate, or ideally be evicted. Only low/no no income people should live in social housing. It states that "affordable" social rent is 80% of the market rate - this is too high - 80% is NOT affordable at today's rent levels and financially disadvantaged people should be renting at 50% market value at the very most.	No	It is not justified	Yes	It will be abused by landlords and it is unfair to social housing tenants on benefits who should be paying far less. There should be NO "high income social tenants" in rented social housing - that is abominal and disgusting! They can afford to rent privately and should pay the market rate, or ideally be evicted. Only low/no no income people should live in social housing. It states that "affordable" social rent is 80% of the market rate - this is too high - 80% is NOT affordable at today's rent levels and financially disadvantaged people should be renting at 50% market value at the very most.
16	Personal view	Yes			No		No		No		No		No		No		No	
17	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Waverley Borough Council agrees the rent standard should apply to local authority registered providers from 2020.	Yes	Waverley Borough Council has no objection to the same requirements (for rent regulation) applying to both local authorities and private registered providers.	Yes	Waverley Borough Council agrees with this proposal believing that the flexibility to increase rents by up to CPI+1% each year will support the delivery of new affordable homes and facilitate further investment in the stock.	Yes	Waverley Borough Council agrees with the proposed direction as it relates to social rent properties.	Yes	Waverley Borough Council agrees with the proposed direction as it relates to affordable rent properties.	Not sure - Don't know	These exemptions are not applicable to Waverley Borough Council.	No	Waverley Borough Council has no further comments to make.
18	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Changes in the Welfare Reform system need to be reflected in the way in which Local Authorities set their rents. Previously Thurrock has always been mindful of the Limit Rent and the impact on Housing Benefit. The rent standard being applied to Local Authorities will continue to protect tenants from large weekly rents and will ensure they are not penalised by the change to Universal Credit.	Yes	Extending rent regulation to local authorities protects tenants whatever type of accommodation they reside in. Thurrock welcomes this alignment.	Yes	The impact of the rent reduction over the last 4 years has been challenging and resulted in significant reductions in the authority's public sector housing service. The council welcomes the proposal to allow Registered Providers to increase rents from 2020 and the Thurrock HRA Business Plan assumes a rent increase of CPI +1% for five years. The council is aware of the impact any rent increase may have on local residents and will continue to put resources into helping tenants budget.	Yes	The authority has reviewed the scale and scope of the Transforming Homes programme and considered that the improvements, although extensive, are not sufficient to meet the threshold set by the government for revaluation purposes. The HRA Business Plan does not include proposals for or an assessment of the rent stream from a wholesale revaluation of the stock.	Yes	In Thurrock there are no plans to increase Affordable Rents by more than CPI +1%.	Yes	This does not apply to Local Authorities so we have no comments to make. We welcome that MHCLG will set out the process for Local Authorities in due course.	No	
19	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	The rent standard should apply to both RP's and LA's. This is a logical approach, as we were previously aiming towards rent convergence with RP's.		The same requirements will ensure alignment with RP's.	Yes	We agree to the proposal to permit registered providers to increase rents by up to CPI+1%, this is in line with RBG's (Royal borough of Greenwich) assumptions on rent increases post 2020.	Yes	We agree with the proposed direction.	Yes	We agree with the proposed direction as it relates to affordable rent properties.	Yes	We agree to the arrangements for exemptions.	No	No further comments
20	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		No	This is clearly a practical solution provided to the difficulty created by the roll out of Universal Credit.	Not sure - Don't know		Yes	A genuine commitment to this as a long term settlement will also support the government's supply objectives by giving associations confidence in their business planning.	Yes	It is a pity that a legacy of the rent reduction legislation will remain in the starting point for existing tenancies: this will complicate the process and the record keeping for years to come. However, we recognise the political and practical reason for this and that there is no real alternative.	Yes	Internally we have already adopted the same policy approach to the resetting of fixed term tenancy rents for existing tenants.	Yes		Yes	The policy statement will be a helpful addition to the new standard, helping to provide context and clarification on a number of matters, including - the objectives and expectations behind the flexibility criteria, - the circumstances in which conversions can or cannot take place - the detailed guidance on valuations and revaluations.
21	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	The Council accepts the reasons for bringing in a new rent regulation function following recent Welfare Reforms	Yes	The Council acknowledges the benefits of having one set of requirements for the social rented sector	Yes	The Council welcomes the ability to be able to increase rents by up to CPI plus 1%. This will enable the Council to consult with its tenants on the benefits of increased income to fund essential repairs and provide additional homes.	Yes	The Council agrees with the proposed direction in that it enables a fair and reasoned mechanism to control rents that breach the rent limit.	Yes	The Council supports the proposal as this enables affordable rents to be reset at 80% of the market rate on re-let. Restricting rent increases in these circumstances by CPI + 1% is a reasonable approach that reduces the impact of rent increases for existing tenants and is consistent with the wider policy set out in the consultation paper.	Yes	The Council is happy to comment on the separate arrangements for local authorities when these are available from the MHCLG	Yes	At a recent tenant consultation meeting with Swindon's Council tenants concerns were expressed about future rent increases and the impact these would have on household budgeting. These comments will also be considered separately by the Council at the time of rent setting from 1 April 2020 onwards.
22	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes	We agree that the rent standard should apply to both housing associations and local authority registered providers of social housing. This will ensure there is greater consistency and alignment of rents across the social housing sector. When setting rents it is essential to ensure affordability for residents, as well as meeting local need and ensuring that communities are socially inclusive and cohesive.	Yes	Please see our response to question 1. In addition, it is important to emphasise that tenancy sustainability is important, regardless of the landlord or rent charged. It is essential to have robust allocations and lettings policies that include affordability assessments before 'sign up' to ensure that tenancies are affordable and sustainable from the outset.	Yes	We agree with the proposal to permit rent increases of up to CPI + 1% each year. The return to CPI + 1% provides certainty around rent levels, increasing the confidence of lenders and allowing us to plan for and potentially borrow larger sums for building even more new homes. We'll continue to build and maintain homes and provide services to meet local needs, create sustainable communities and fulfil the government's wider objective of boosting the supply of affordable homes.	Yes	We agree with the proposed direction, especially that there should be a limit on social rent to allow rents to remain affordable to those most in need. Hence we also agree that we have discretion to set lower rents where appropriate to enhance affordability; this supports sustaining tenancies and communities.	Yes	Although there are no major changes to the way in which affordable rents are set and rebased, we agree with the proposed direction, especially the limit/protection offered to new tenants when rents are reset (landlords will not be permitted to increase the rent by more than CPI+1% per annum). This will ensure affordability and the greater sustainability of tenancies (in many areas we understand that market rents have increased substantially over the last 4 years during the rent reduction period).	Yes	We agree with the proposed direction to safeguard providers financial viability, in exceptional circumstances only, the Regulator can exempt a provider from one or more requirements of the rent standard.	Yes	We have some concerns over wording in the draft policy statement concerning rent flexibility: 'We expect providers to use this flexibility in a balanced way, and not set all rents at 5% (or 10%) above the formula rent'. We understand that some housing associations applied these uplifts as standard practice on most rents. We accept that the new guidance should ensure that rents remain affordable for customers, however, at worst this change means a potential reduction in income for some landlords that will reduce the funding available to invest in new and existing homes, negatively impacting on the governments wider objectives e.g. boosting the supply of new affordable homes. The government should consider amending the policy statement to clarify what is meant by 'balanced' and how they intend to enforce breaches of this new criteria.
23	Organisational response		Other (please explain)	Residents Association	No	The Rent Standard is only a 'direction' from the Government to the Regulator of Social Housing, it is not enforceable by tenants. Because of the poor regulatory track record of the Housing Corporation and its successor body the Regulator of Social Housing, housing association rents were allowed to escalate above those of local authorities. Eventually central government was compelled in 2015 to overreach its own regulator (the Housing Corporation) and directly issue specific rent guidance to require the harmonisation of rents between housing associations and councils. Seventeen years later the Regulator of Social Housing is still not effectively enforcing this guidance and cannot be entrusted with local authority rent controls. The current framework of statutory rent control (under The Social Housing Rents (Exceptions and Miscellaneous Provisions) Regulations 2016) is therefore preferable. The regulations should be amended and maintained so that tenants and their legal representatives can enforce their rights to regulated rents directly. If Rent Standard is too easily breached, the Regulator has a poor track record in using its enforcement powers, a track record that has been repeatedly condemned by Parliamentary Select Committees as ineffectual, overly conservative, and too accommodating to the opinions and advice of housing association managements to the detriment of tenants.			No	CPI- increases only. There is no evidence the housing association sector requires above inflation rental incomes to be reintroduced; to do so would be detrimental to tenants at a time when employment is at an all-time high: Despite several years of statutory rental decreases under the Welfare Reform and Work Act 2016 and the relatively minimal impact of higher incomes from 'Affordable Rents', the overall surplus of housing associations has increased by £200m to £3.5bn and "turnover from social housing lettings has increased by 1% and rent receivable has increased by 0.6%" (Global Accounts of Private Registered Providers December 2017). There have been no known examples of housing associations having collapsed or having had to approach the Regulator in financial stress arising solely from the Welfare Reform and Work Act's rent cutting regime. According to the Global Accounts; "The sector invested £7.9bn in new or existing social housing properties for rent based on consolidated returns (2016: £7.5bn excluding stock transfers). Investment attributable to the development of new homes increased from £5.6bn in 2016 to £6.3bn in 2017". According to the government's 30 January 2018 statistical release (Social Housing Lettings: April 2016 to March 2017, England) 37% of general needs social housing tenants are now in employment (this is 38% in local authority housing). This percentage represents largely low-paid workers who will be reliant on wages rather than Universal Credit or housing benefits to meet much of their rents. In addition, many pensioners in social housing are reliant on pensions rather than housing benefits to cover some or all of their rental payments. There is no justification therefore for a system that allows above average inflation rent rises to be built in year on year that thus penalise vulnerable and low income workers and pensioners. Instead of recommissioning the 'gravy train' and 'rewarding' housing association managements with above-inflation guaranteed income streams, Government should be tackling the obscene and unregulated private salaries (and year on year inflation busting pay rises, final salary pensions and pension pot bonuses and perks) of housing association chief executives and their senior staff. -linked	No	Statutory rent control for social rental properties should be retained and CPI+1% should not be implemented. The Regulator's track record on rent control enforcement for housing associations is too poor. Many housing associations have unlawfully 'converted' properties to market or near-market rents (despite being charities) and the Regulator has taken little or no action to investigate or reverse these abuses.	No	Statutory rent controls should be maintained and 'Affordable Rents' should be repealed and replaced with 'target' social rents.	No	The handling of exemption requests from registered providers to exempt them from already too-weak rent control provisions should be removed from the purview of the Regulator and transferred to professional oversight by the Rent Officer Service (VOA). The Regulator has no expertise or suitably trained staff to adjudicate on these matters and has not proven fit to manage the former Rent standard to the benefit of social housing customers.	Yes	So-called 'Intermediate rents' exist now only because of the Regulator's former incompetence and inability to police rent control effectively which allowed this rogue category of near-market rental accommodation to emerge what was supposed to have been a regulated sector; this malpractice became so widespread, especially in newly registered and for-profit providers (because of the Regulator's weak regulation and poor registration decisions) that it has had to be legalised through the Social Housing Rents Regulations. The sham of 'intermediate rents' has been used to drive out key workers and sell off housing stock (for example by Peabody in the former Crown Estate properties in London). Intermediate rents should be outlawed under fresh statutory rental controls and replaced with genuinely affordable social rented housing.
24	Organisational response		Other (please explain)	Rural Housing Alliance	Yes			Housing associations are independent organisations which should have freedom to set their own policy for their primary source of income. Housing associations were reclassified as private organisations by the ONS in November 2017 and the new rent settlement should reflect this independent status. Housing associations should be given the flexibility to set rents that better suit the needs of their tenants. In rural areas, local wages are lower than the national average while house prices are higher. We would welcome a rent policy that allowed rural providers better scope to set rents that reflected local economic circumstances. More control over the future direction of rents would give housing associations more confidence to increase the scale of their development programme. Likewise, lenders and investors would have more confidence in the sector's ability to service and repay debt, which would increase the availability of new finance and reduce its cost. Increased rent flexibility for housing associations would also provide more scope to innovate. For example, some housing associations, such as Hastoe and Worcestershire Rural, have completed some of the first Passivhaus social housing schemes in Rural England, whilst English Rural and Shropshire Rural have invested significant sums retrospectively upgrading around 20% of its social rent housing stock off mains gas with air-source heat pumps. Innovations such as the examples provided address fuel poverty and provide affordable warmth, as well as contributing to the government's targets. Heating costs for a Passivhaus are around £2-3 per week. Rent flexibility would allow housing associations to factor in the running costs of a home in to the affordability calculation when setting or re-setting rents – and thus invest more confidently in innovation.	Not sure - Dont know	Ideally, housing associations would have far greater flexibility over setting their own rents. However, we welcome the CPI+1% announcement in that it provides financial certainty to housing associations that 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 CPI + 1% proposal it will be important to do so with certainty that this is a longer term commitment, enabling providers to plan with confidence to deliver the homes need to address the housing crisis. A commitment beyond the proposed five year term would be valuable in securing confidence on the part of housing associations and their funders, resulting in even more ambitious plans to build more homes that meet the Governments own targets.	Yes		Yes	We agree that, where registered providers are re-setting the rent as a result of re-letting to an existing tenant, the rent should be limited to CPI+1% per annum and not be re-set at 80% of market rent. This could cause a big jump in the rent - linked to a rise in the private market – and is unfair on an existing tenant. More generally, the current definition of 'Affordable Rent' at 80% of market rent is a blunt tool which is simply unaffordable for many rural households on low incomes. Increased flexibility for rural providers would allow a more sensitive approach to rent setting in rural areas that wasn't linked to a broken private market. The Joseph Rowntree Foundation recently compared social rents and affordable rents in local authorities. In a typical rural district, such as Uttlesford, there is a £1,904 annual difference between social rents and affordable rents – more than a third more expensive. The Government should completely rethink the concept of 'Affordable Rent'. Future grant should be directed either at social rent or a rent that takes into account local income levels.	Yes	We agree the Regulator should be permitted to exempt a private registered provider from one or more of the requirements in the rent standard if compliance would jeopardise their financial viability. This would allow appropriate flexibility for housing associations that need to raise rents for a period to improve their financial position. Conversely, we would also welcome greater guidance from the regulator aimed at private registered providers who insufficient set rents at a level necessary to sustain their objectives, given that this presents a threat to the good reputation of the sector	Yes	Use of County-wide earnings: Under the new rent policy statement, formula rent is still calculated using earnings data from large county areas. This is a wide geographical area to use for earnings data. For example, in the county of Dorset, gross weekly earnings can vary from: £397.80 in Purbeck LA to £520.50 in East Dorset LA However, despite this disparity, the same average earnings figure for the whole of Dorset are used (which have been used as the benchmark since 1999). This means that, in some large rural counties, social rents are far more affordable in some localities than in others. Ideally, a new rent settlement for social housing would use more local earnings data derived from a more local level than county-wide, would be a better place to start. This would help ensure that social rents better reflect local earnings and are truly affordable for local people.

25	Organisational response		Other (please explain)	Law Centre	No	Presently the rent standard has not been enforced and providers will regularly breach guidance on rent setting. This has led to an uncontrolled quasi-market rent sector which the regulator has been unable to control. Tenants have little or no redress within the current regulatory system and are left at risk of arbitrary and excessive rent setting. The risk is that if the same principles apply to LA tenants then they too will be left unprotected.	Yes	But with the caveat that this is underpinned by some statutory protection, such as that which is afforded to LA tenants.	No	CPI only. Registered providers have enough leeway within the current system without the capacity for further increase. Tenants have little protection in respect of existing rent standards and with the setting of service charges which in our experience is frequently maximised to bolster income.	No	No CPI only	No	Affordable rents should be dismantled altogether. For tenants in East London where we are based in our experience they create issues of affordability which undercuts any sense of social housing security. Neither do they appear particularity popular with many of the providers encouraged to adopt these models.	No	The track record in regulating such matters is not strong and we would question whether the proposed model would be fit to adjudicate on such exemptions.	No	Abolish intermediate rents. This has developed into a key part of the sector particularly within regeneration schemes, but its legality is questionable, and it dilutes the sector by creating a further form of rent/tenure which escapes social housing statutory protection and regulatory control.
26	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	We understand that the current Rent Rebate Subsidy Limitation scheme will not provide the relevant protections as Universal Credit is rolled out, and that an alternative mechanism is needed	Yes	Aligning the requirements of local authorities and private registered providers will ensure a consistent approach.	Yes	This is in line with previous government announcements, and therefore reflects the expectations of the sector.	Yes	The changes to the rules on social rent are not considered to be significant. The clarification provided in relation to the circumstances in which properties may be re-valued for the purpose of rent-setting is welcomed.	Yes	We support the intention of the proposal relating to re-setting affordable rent, in that it should protect individuals in situations where the property is re-let to an existing tenant.	No	It is not clear why private registered providers could be exempt from complying with requirements and for this not to extend to local authorities. It is our view that local authorities should be entitled to apply for an exemption in the same way as a private registered provider.	No	
27	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes	Yes. It would be appropriate for all social housing landlords to be covered by the same rent standard.	Yes		Yes	After four years of rent reductions it is appropriate that landlords should be able to apply increases up to CPI + 1%. Consistency in rent policy is vital to give landlords confidence to invest in building new homes and improving existing homes. Supported housing providers have faced additional uncertainty over the last 3 years due to Government proposals on funding supported housing. We welcome that these proposals have now been withdrawn and we are keen to develop an appropriate oversight regime regarding quality and value for money. However, it must be stressed that the commitment to maintain the funding of supported housing in the Housing Benefit system needs to be maintained to give providers the confidence to invest in new homes that will reduce the pressure on health and social care services. Feedback from some residents suggests that they are frustrated that Government policy should have applied a rent reduction followed by a CPI + 1% increase they would have preferred a period of steady increase over this period, probably in line with CPI.	Yes		Yes		Yes		No	
28	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)			Yes we agree, but further controls are required. The existing legislation allows the Secretary of State power to direct the Regulator of Social Housing to implement government-led rent-setting policy. We believe this provision should be revised as the Regulator is an agency of Government and is not an independent body. An independent body should be given powers to set annual rent increases, in a similar way the control over interest rates was handed to the independent board of the Bank of England in 1997. Decisions around rent increases should relate to the costs of maintaining and managing the housing stock and not to other arbitrary measures under consideration by the incumbent Chancellor of the Exchequer. -Only under this arrangement could stability be returned to local authority housing business plans, as local authorities and tenants would then have some faith in rent increase settlements.		Yes, we agree, all social housing providers' decision-making on rent setting should be consistent and transparent.		Yes, we agree that rents should be increased from 2020/21. However, rents should be guaranteed for a minimum of 10 years, and preferably for the 40 year period of local authority HRA business plans and the recent Building Council Homes for Londoners bid which was based on assumptions about the longer term rent levels. This would help give councils and tenants some certainty and the confidence and ambition needed to invest in the improvement of their housing stock, as well as to build new social rented homes. Four year rent reductions up to 2020 were imposed by Government shortly after a previous 10 year policy of CPI + 1% was introduced. This has unfortunately led to some scepticism and lack of certainty around the Government's guarantees regarding rent-setting guidance. In addition to this, the Social Rent Reduction (SRR) will, on completion, have resulted in a 9% adverse drift in anticipated HRA rental income. This has had a significant adverse impact on HRA business plans [illegible] recommendations in the aftermath of Grenfell. [illegible] needs to be addressed. To do [illegible] based on actual CPI figures [illegible] the lower rent base - will, over [illegible] 2017 and 2028/29 would be [illegible] needed to be CPI +2% for 10 years [illegible] 4 years. We therefore propose 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 resulting from a four year reduction in social rent levels.		This direction does not apply directly to Hackney Council as a landlord, as we have a commitment to providing homes at genuinely affordable, social rent levels. However, as the local strategic housing authority, we would want Registered Providers working in this borough to scrap Affordable Rent and bring rents in line with Social Rent or London Affordable Rent levels. "Affordable" Rent may be appropriate in other parts of the country, but rent levels of up to 80% of local market rents are totally unaffordable to households on low incomes in Hackney, and elsewhere in London. We have consistently opposed them since they were introduced. Unaffordability is particularly the case for households in receipt of benefits, as a result of the Government's welfare reforms. According to the London Rents Map, the current average rent for a one bedroom property in the borough is around £1,500 per month. At 80% of average borough market rents, valuation would be around £1,200 per month, requiring an income of £42,400 per annum to be considered affordable. We believe that Social Rent and London Affordable Rent (introduced by the Mayor of London) are genuinely affordable for those in the borough on low incomes.		Yes, we agree with the arrangements for exemptions from the rent standard on financial grounds provided they are exceptional circumstances.		Hackney has an ambitious house-building portfolio - we have already delivered nearly 600 homes and are forecast to deliver a further 2,000 homes over the next four years. Our programme approach to delivering new genuinely affordable housing uses a 40 year business plan. A rent guarantee of just five years does not afford us the certainty that we require. This is why we have proposed a 10 year minimum period in the response to question 3 as well as proposing a rise of CPI + 2% to recoup lost incomes from the rent reduction.
29	Personal view	No			Yes	LA's need a consistent approach and one that minimises the potential for challenge.	Yes	The fundamental principle of social housing rents is that social rents are similar in a similar area, regardless of provider. To avoid the potential for differential rents, which the principle sought to remove, it is right to apply the principle to all social providers.	No	I believe the rent should be prescribed TO CPI+1%, not UP TO, which allows for ambiguity and could therefore be impacted by short term political decisions that are contrary to the long-term benefit of Housing Revenue Accounts.	No	2(b) is a specific direction. 6(3) needs to remove "more than" to avoid ambiguity and be a specific direction.	No	7(4) needs to remove "more than" and should be a specific direction.	Yes		Yes	The value set for high income tenants and total household income is too high to make a realistic impact in some areas. This ought to be variable from area to area. The data should reflect the employee earnings in the UK as calculated by the ONS as for the local area. For example, gross median earnings were £569 per week in the latest data. However, using fig 7 showed London as high as £713.20; the North East as low as £506.80. £569 x 52.14 (reflecting 365 days) = £29,669 so £30k rounded x 2 = £60k. £713.20 x 52.14 = £37,188 so £37k = £76k. £506.80 x 52.14 = £26,426 so £26k = £52k. Therefore the value for high income tenants should reflect the median local areas, ideally by county by at worst by region, to ensure a more realistic value that can be used in local areas.
30	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	The MHCLG should consult and engage with local authorities regarding what, if any, other matters are proposed to be regulated by the Social Housing Regulator.		Basildon Borough Council does not have any comments on this question.			Yes			Basildon Borough Council does not have any comments in respect of this question.	Yes		No	
31	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes	There should be a level playing field between providers of social housing. However local authorities should undertake thorough risk assessments and/or stress tests to determine the impact of the Rent Standard on their business plans. Any adverse impacts need to managed, with Government support if needed (for example, a phased approach to the introduction).	Yes	As stated above, there should be a level playing field between providers of social housing. However local authorities should undertake thorough risk assessments and/or stress tests to determine the impact of the Rent Standard on their business plans. Any adverse impacts need to managed, with Government support if needed (for example, a phased approach to the introduction). There needs to be a focus on the affordability of rents and funding landlords ability to effectively meeting their obligations rather than a focus on reducing or controlling expenditure welfare benefits.	Yes	After four years of rent reductions any increase is welcome to help landlord's meet the obligations, provide services to tenants and deliver new homes. This financial stability is important and confirmation of arrangements beyond 2025 would provide even more stability, particularly given recent Prime Ministerial support for long term funding arrangements for housing associations.	Yes	We would repeat our comments about properly assessing and managing the impact on local authority business plans.	Yes	We particularly support the proposed protection for re-lets to existing tenants.	Yes	Not an issue for us but clear guidance is needed.	No	
32	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Not sure - Don't know	The private sector may face different pressures to LAs and could be forced out of the market, hence reducing the supply of housing and putting pressure back on LAs to pick up the strain.	Yes	I would rather see the increase than the current position, but in an ideal world, the level of local rent should be a decision for local democracy and not a mechanism for saving central government the cost of proving welfare support to those who are on low incomes. The rent basis should be given a maximum by geographical area, based on the average rental charge in those areas from all sources. CPI+1% does not relate to the cost of providing housing so is not necessary a logical basis for rent setting. In addition, it does not allow for catch up in areas that have done more to keep rents low historically and now face pressures or address inequalities between neighbouring councils due to historical difference in rent levels sent.	Yes		Yes		No		Yes	
33	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes		Yes	The limit of CPI+1% per year when a property is not re-let follows our rent setting process prior to the statutory rent reduction. The proposal is welcomed especially as the proposal states that the 'new policy' lasts for at least 5 years. This provides stability for modelling and planning purposes.	Yes	Sheffield's rent setting processes have always adhered to government guidance and we have not charged rents that are higher than formula rents. Therefore a transfer from guidance to regulation will have no negative effect on income.	Yes	The methodology to re-calculate affordable rent on re-let is unchanged except when the property is re-let to an existing tenant and the re-let would result in a rent increase greater than CPI + 1%. Limiting the rent increase in such circumstances is reasonable and we anticipate that the effect in Sheffield will be negligible.	Yes		Yes	We welcome the clarity that the proposal provides for the next 5 years. We would appreciate the exploration of an optional standard set of assumptions on rental income that could be applied to the subsequent 25 years of our HRA Business Plan
34	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		No	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 that local authorities would be able to run their HRA as a 'business' with responsibility for raising income and paying for all HRA expenditure. As rent is the principal income source within the HRA having discretion over rental policy is fundamental for local authorities to raise the income they need to fulfil their long-term aspirations within the HRA. In the case of Tower Hamlets this includes a commitment to delivering 2,000 new affordable housing units at social / affordable rents. If this proposal comes into force it will be another U-turn in terms of undermining the assumptions underpinning HRA Self-Financing. The HRA Self-Financing settlement issued prior to the start of HRA Self-Financing in 2012 contained certain assumptions about Council's rents over the 30 year period from 2012/13 to 2041/42. These were set out by CLG in "Self-Financing: Planning the Transition", published in July 2011 (para 3.1.5) and were as below: • that guideline rents will converge with formula rents in 2015-16 • rent increases of just above inflation year on year after 2015-16 • a limit on individual annual rent increases of RPI + 0.5% + £2 per week up to convergence and thereafter for annual increases in formula rents of RPI + 0.5%. It was also stated in that document that "Government does not have any plans to change the national rent policy set out above." These assumptions about future rental streams were factored into the valuation of our HRA business plan, and affected the amount of debt that we took on, the level of our debt cap and all these factors informed the assessment that we made regarding the future financial viability of our HRA. In line with the assumptions in the HRA Self-Financing settlement, all of our initial HRA modelling included the assumptions that we would follow rent restructuring and aim to achieve convergence by 2015/16; and that after 2015/16 rents would increase by RPI + 0.5%. The subsequent changes to social rents (ending rent convergence a year early, the four years of 1% rent cuts, and now the current proposal to remove discretion in relation to rent-setting) have introduced uncertainty into our HRA business planning, and resulted in a large reduction in our projected HRA resources compared to our previous assumptions which were based on the HRA Self-Financing settlement. Housing rent is our principal source of income in the HRA and we are disappointed with these proposals to make such substantial changes to our main income stream, and urge the government to rethink these proposals.	No	No, we do not agree and would like to remind MHCLG about the HRA self-financing settlement. One size will not necessarily fit all. Rent restructuring has driven the alignment in rent levels between RPs and LAs. If the regulator is to take on LA housing we should see all the standards together, not just this in isolation. Anything that reduces LA flexibility on rent setting should be treated with caution. The following was our assessment of the projected impact of four years of a 1% rent cut: Loss of rent over four years - The cumulative impact over the four years (2016/17 to 2019/20) would be a loss of rental income of over £24 million of the total rent of £302 million that is anticipated for that period (this includes inflation.) Future Loss of Rent Income - over periods of 10 years and 30 years The projected cumulative loss of rental income over 10 years is approximately £92 million of the previously modelled £837 million, and over 30 years the loss potentially exceeds £420 million of the anticipated £3,476 million (this includes inflation). The impact of the reduced levels of rental income means that there are fewer resources available to finance the HRA capital programme including new-build. As can be appreciated from the figures above, there has been a substantial negative impact on our HRA in terms of the loss of income resulting from the changes that have already been made to rent policy. The current proposal to enforce CPI + 1% rises only for the next five years, and then unknown rent policy after that will again reduce the resources available to our HRA and introduce uncertainty as we do not know what rent policy will be enforced after five years of CPI + 1% increases."	No	No, we do not agree. Notwithstanding the removal of the HRA debt cap and the government's expectation that this will lead to increased Council house building, it must be appreciated that additional HRA borrowing is not 'free' money and will need to be undertaken within the Prudential Code. One of the assessments of the Code is that borrowing is affordable, prudent and sustainable. As already mentioned, the main source of HRA resources is rental income which local authorities will – if this proposal is implemented – now not be able to have any discretion over which will affect the resources that have to service any additional borrowing that is now available. We would also like to highlight that in addition to the various changes to rent policy since HRA Self-Financing began in 2012, the re-invigoration of the Right to Buy scheme has led to us selling 1,064 of our housing stock (8.5% of the tenanted stock that we had in April 2012). This has had an impact on our HRA in terms of reduced rental income arising from fewer tenanted properties, and has led to this borough retaining 1-4-1 receipts of £113 million to date. As the Authority is committed to spending these 1-4-1 receipts we will need to identify 70% of other capital resources (c. £264 million) To illustrate the potential impact of the current proposal the table below shows the impact of various rent increases on the rental income to our HRA over various time periods: Years 1- 6 Years 1-10 Years 1-30 CPI + 1% for 5 years (current proposal) £408m £722m £2,675m CPI + 2% for 5 years £415m £744m £2,789m As can be seen, if we had discretion over rent policy and wanted to implement a CPI + 2% rent increase for five years (rather than CPI + 1%) then our HRA would have additional rental income of £7m over years 1-6, £22m over years 1- 10 and £114m over years 1-30. This would enable us to undertake even greater levels of house building than we are currently planning.	No	No, we do not agree, given our objections, stated above, in questions 1 to 3.	No	No, we do not agree, given our objections, stated above, in questions 1 to 3.	No	No, we do not agree with this proposed arrangement. The current proposals are that the Regulator could exempt a private registered provider from one or more requirements in the rent standard if complying with the requirement(s) would jeopardise the private registered provider's financial viability. The current proposals are that this would not apply to local authority registered providers, and that instead, the rent standard will not apply to certain categories of housing. We would argue that in line with private registered providers, there should be an arrangement to exempt local authority registered providers from the rent standard on financial grounds. It should also be recognised that depending on the test / threshold it may be the case that a local authority would find it difficult to show financial hardship, for example it may be that according to a local authority's HRA 30 year business plan, the currently projected HRA expenditure could be serviced from the CPI+1% rent increases proposal, but the 30 year business plan may not currently reflect the fact that restricted rent rises may mean that local authority's aspirations for their HRA businesses may be hampered. For example, a local authority may have aspirations to undertake a large new-build programme in future, which may not be reflected in current HRA financial forecasts and it would be hard to capture this lost opportunity that would arise from the fact that the local authority lost income due to losing control of its rent policy.		By way of conclusion, we would like to see more certainty from the Government over the longer term arrangements for rent regulation. We consider that the proposals contained in this consultation paper should be applied to the Private Rented Sector rather than Local Authorities, who should be free to apply whatever rent increases are appropriate under the HRA Self Financing determination. The restrictive 5 year CPI +1% proposal and uncertainty over subsequent arrangements will have an impact on our ability to fund borrowing to boost housing supply.
35	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes	Although we would welcome feedback around whether any consideration for a rent freedom model has been given beyond 2025.	Yes		Yes		Yes		Yes	We would welcome feedback on whether any consideration has been given for a rent freedom model beyond 2025.
36	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	The consultation has highlighted that the current arrangements are not compatible for controlling the welfare costs associated with local authority rents since the introduction of Universal Credit. The proposed direction will enable the council to increase rents by CPI+1% should we wish to do so. This will provide increased revenue for investment (provision of new homes and maintenance of current assets).	Yes	The same requirements should apply to both as this will provide a stable environment to support the delivery of new homes and will provide parity across the sector in terms of rent increases.	Yes	This allows for flexibility to increase rents up to CPI+1%	Yes	Although those tenants who pay rent (rather than receive housing benefit to cover the rent) will have to pay higher rents, the additional revenue will create a stable environment to support the delivery of new homes.	Yes	The direction would protect existing tenants living in affordable rent properties whose 5 year flexible tenancy is being renewed at the end of its term from possible excessive rent increases.	Not sure - Don't know	This does not apply to local authorities so not applicable.	No	
37	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes	While local authorities are best placed to determine any potential impact, we support the principle of extending the rent standard to local authority registered providers. This would provide a fair and consistent approach for tenants of both housing associations and local authority landlords.	Yes	While local authorities are best placed to determine any potential impact, we support the principle of applying the same requirements to local authority registered providers from 2020. This would provide a fair and consistent approach for tenants of both housing associations and local authority landlords.	Yes	We welcome government's proposal to permit annual rent increases by up to CPI+1% from 2020. We feel this approach strikes the right balance between protecting current social housing residents, allowing housing associations to invest in building more new homes and providing ongoing and improved maintenance and landlord services. However, we'd ask government to consider a more progressive approach to rents, allowing housing associations to adjust individual rents while remaining in an overall rent envelop, which would be limited to an overall increase of up to CPI+1% per year. We'd also ask government to consider taking an even longer view. Alongside the strategic partnerships with Homes England and the £2bn for investment in new social housing from 2021 to 2028, this would allow local authority and housing association landlords to plan more effectively for the future, investing in new homes and services.	Yes	We agree with the direction relating to social rented properties.	Yes	We agree with the direction relating to affordable rent properties. We're currently reviewing our approach to fixed-term tenancies, but rent increases should be limited to CPI+1% for existing tenants that relet their current home.	Yes	The Regulator has a range of powers to manage and ensure a registered provider is financially viable. We understand that the ability to exempt providers from one or more requirements in the rent standard would be a useful addition to the powers, to protect the long-term provision of social housing. However, we'd question the extent to which tenants should cover the cost of poor financial management, which could have a significant impact on their financial position. Therefore, while we agree with the direction, we'd stress that it should only be used in exceptional circumstances.	Yes	We welcome government's proposal to permit annual rent increases by up to CPI+1% from 2020. We feel this approach strikes the right balance between protecting current social housing residents, allowing housing associations to invest in building more new homes and providing ongoing and improved maintenance and landlord services. However, we'd ask government to consider a more progressive approach to rents, allowing housing associations to adjust individual rents while remaining in an overall rent envelop, which would be limited to an overall increase of up to CPI+1% per year. We'd also ask government to consider taking an even longer view. Alongside the strategic partnerships with Homes England and the £2bn for investment in new social housing from 2021 to 2028, this would allow local authority and housing association landlords to plan more effectively for the future, investing in new homes and services.
38	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes		Yes		Yes		Yes		No	
39	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes	Agree. An alternative mechanism is needed due to the reduction of Housing Benefit recipients therefore rents now need to be regulated.	Yes	Agree. It's important that all Housing Providers are being regulated by the same body using the same Rent Standards.	Yes	Agree. It provides future financial security for FCHO.	Yes	Agree. We feel the new proposal is fair and equitable as it now incorporates all Housing Providers to ensure they all play there part and help put welfare spending on a more sustainable footing.	Yes	Agree. As a Social Housing Provider these arrangements are what we already adhere to.	Yes	Agree. As this will provide consistency and safeguards the future financial viability and minimises the risk of losing homes for private registered providers and tenants.	No	
40	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes	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.	Yes		Yes					
41	Personal view	Yes			Yes	It makes perfect sense to ensure all providers of "social housing" are finally subject to the same set of standards.	Yes	Again, all providers of housing should be subject to the same set of standards, regulations and controls.	Yes	This proposal is fine as long as the rent cap is similarly set at the right level to continue to protect tenants on a low income.	Yes		Yes	Again, this is acceptable as long as rent caps are kept at a realistic level to protect tenants of a low income.	Yes	This is fine as long as the bar is set high enough to prevent abuse.	No	
42	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		No	NCC believes that the freedom to make local decisions on rent levels should be returned to Councils. Returning this freedom ensures that individual local authorities can ensure that aggregate rental income is sufficient to finance the long-term management and maintenance of existing stock to Decent Homes Standard, refurbish older stock and allow for a significant level of new house building. This freedom also returns the ability for local authorities to set rents per local policies and principles, providing a health HRA which could fund new build, regeneration and other capital works in line with the Council's long-term housing priorities.	Yes	NCC agrees that the same requirements should apply to both local authorities and private registered providers. Annual Rent Increases CPI+1% ceiling to rent increases as previously announced. Newcastle's 30-year HRA Business Plan has always assumed that the guideline rent increase would return to CPI+1% after the four-year rent reduction period, so there were no real changes to the business plan because of the announcement. However, there is now more confidence in the business plan given that uncertainty over the rent increase has been removed, at least for the period 2020 to 2025.	Yes	NCC agrees that registered providers should be permitted to increase rents by up to a minimum of CPI+1% each year. The decision on rent increases is a key assumption in NCC's long-term business planning and this is based on a return to an annual rent increase of CPI + 1% after 2020, as per the original pledge when the four-year 1% rent reduction was introduced and the more recent announcement from government. This level of annual rent increase helps ensure the long-term viability of the HRA and ensures that the debt cap is not breached. A commitment that the increase would remain for a more considerable period would be helpful to guarantee resources are available in later years and allow for more robust business planning. The long-run wedge between RPI and CPI (which is projected to be 1% by the Office for Budget Responsibility) means that an increase below this level would impact on balancing rental income with housing related expenditure, threatening the long-term viability of NCC's HRA. Social Rent Where rents exceed the formula rent plus the flexibility, maximum increases will be CPI only until the rent is within the flexibility level and when re-let reduced to formula plus flexibility (subject to rent caps). This is significant for authorities who have not applied rent caps or have chosen to set higher rents in the past and accepted the rebate subsidy limitation; neither of these apply to Newcastle. A registered provider may re-value where it has carried out major works that materially affect the value of the property (thus impacting on the formula rent). Although it is anticipated that this is only likely to arise in exceptional circumstances and not to reflect repairs, maintenance or kitchen/bathroom replacements. Social rent cannot be converted to other rents unless there is specific agreement to do so.	Yes	The relationship between formula rent and actual rents was distorted when government ended rent convergence policy with the introduction of new rent guidelines which came into place for 2015/16. NCC currently follows a policy of increasing rents to formula rent when a property is re-let following vacancy. Formula rent has not been achieved for 15,668 of our 25,309 social rent properties. Continuing the use of this approach will allow us to continue to close the gap between average and formula rent, meaning we can continue to invest in our existing stock and ensure that a relatively small supply of new affordable housing is maintained. NCC believe that there is a case for reviewing the reference to the 1999 values and earnings data in the calculation of social rents, to make social rent more responsive to current local housing market trends and conditions. The formula cannot continue to be based on out-of-date figures indefinitely as; using out-of-date information disregards disparity in the housing market over time, as well as changes to policy, and the impact these have. Affordable Rent CPI+1% increases for existing tenants and not more than 80% of market rent for new tenancies. Affordable rent cannot be converted to other rents. Newcastle currently has 372 affordable rent properties; however, this figure will increase with the Regeneration and New Build and Acquisition elements of the current HRA Capital Investment Programme.	Yes	NCC agrees with the proposed direction as it relates to affordable rent properties.	Yes	NCC agrees with the proposed arrangements for making exemptions from the rent standard on financial grounds.	Yes	A further comment from Newcastle relates to how the new rent standard is regulated for local authorities, and will Homes England start to inspect Local authorities to ensure compliance. If so this is a fundamental shift. In principled we agree with this change, but are cautious of the implications if this is agreed without clarify on how this will be regulated.
43	Personal view	No			Yes		Yes		No	Too high for tenants	No		No		Yes		No	
44	Organisational response		Other (please explain)	The National Federation of ALMOs (NFA) (www.almos.org.uk) is the trade body which represents all housing Arms' Length Management Organisations (ALMOs) across England. The NFA represents 32 ALMOs which manage just over 440,000 properties across 35 local authorities. The NFA represents the interests of ALMOs at the national level and provides advice and support for members.	Yes	The NFA understands that a new form of restraint on rents will be required following the introduction of Universal Credit and the loss of the limit rent mechanism. We therefore agree that applying the rent standard to local authority registered providers from 2020 seems the most sensible approach, especially given the general direction of travel for the same regulation across the whole of the social housing sector.	Yes		Yes	As the Capital Economics report for SHOUT and the LGA showed earlier this year, CPI plus 1% strikes the right balance between increased delivery of new homes and affordability for tenants. The NFA would like to see certainty in the rent framework 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 Councils or Registered Providers.	No		Yes		Yes	The NFA supports the approach which would enable the Regulator to intervene if the financial situation of any individual provider required it to.	Yes	The NFA acknowledges that there are some in the local authority sector who believe in principle that councils should be free to set their own rents within the confines of the 1985 Housing Act as they did prior to the rent cut via legislation. However, in practice, the vast majority of councils have never increased their rents above the guideline rent increases set out by central Government and many have agreed lower increases. The NFA believes that on balance, rental restraint should apply equally to all providers of social housing and therefore apply to all tenants of social housing. However, this equal playing field should also be extended to policies such as the Right to Buy. This could be best achieved by a lower, more sustainable RTB discount and leaving all receipts with the selling organisation.
45	Organisational response		Other (please explain)	Arm's-Length Management Organisation (ALMO) managing stock on behalf of the Council, as well as a registered provider for a small number of stock we own		Local authority providers have already been subject to the same rent setting restrictions as private registered providers since the introduction of the Welfare Reform and Work Act 2016. They are also likely to be subject to the wider economic standards, which includes the rent standard, under proposals contained within the Social Housing Green Paper consultation. Extending the rent setting obligations to include local authority providers makes sense in that context, but it is important that any proposals contain an element of local flexibility that would enable councils to set rents at above CPI plus one per cent where local conditions demonstrate that additional increases are viable and necessary to meet need.	Yes	If the proposal to apply the rent standard to local authority providers is agreed then it would be practical for both provider types to be subject to the same requirements. However, local authorities are currently subject to different rules than private providers and these place them at a financial disadvantage. In particular, local authorities are required to sell their stock through Right to Buy and can only keep a small proportion of the receipts. If all social landlords are to be subject to the same standards, councils should be allowed to retain 100 per cent of Right to Buy receipts to create a level playing field.	Yes	A return to planned rent increases of CPI plus one per cent would provide a degree of certainty for registered providers. This will give us a business plan that can meet the capital need by enabling long-term 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 investment needs of the business plan. However, there should also be a degree of local flexibility to increase rents at above CPI plus one per cent, where increases can be sustained by the local market and local conditions demonstrate this is necessary to deliver new homes where schemes may otherwise be unviable, for example, due to land shortages or building costs. In particular, there should be a link between performance on economic and consumer standards; development programmes and rent setting. This would achieve a balance between the Government's objectives of delivering new homes, controlling rent levels and having a high performing, financially responsible social housing sector.	Yes	The direction provides clear guidance and flexibilities for social rent within specified parameters, such as formula rents. As the consultation states, this is not a significant deviation from the rules in place prior to the Welfare Reform and Work Act and so it should not represent a significant challenge to most providers. However, there should be an additional mechanism to increase rents for existing tenants where these are currently lower than formula rent. Several local authorities manage properties that were unable to complete the rent convergence when the rent reduction was introduced. The flexibility to increase these rents is therefore required for existing tenants, rather than only when properties are re-let. This would remove the current differentiation between similar properties on different rents, as well as help deliver more affordable homes and maintain existing properties.	Yes	The protection of the rights when properties are re-let to existing tenants is welcomed. The revaluation of affordable rent properties when they become vacant is also welcomed, as it ensures affordable rent levels continue to match market conditions. However, we would want a guarantee that if market rents were to fall, there would be a minimum of a rent freeze when the property is re-let, rather than a rent reduction.	Yes	We agree that private registered providers should be considered for exemption from the rent standard where they can demonstrate it would jeopardise their financial viability.	Yes	The proposal to increase rents by CPI plus one per cent for five years is welcomed, as the rent reduction has negatively affected our business plan, particularly in terms of the financial viability of delivering new build schemes and investment in the capital programme. However, this does not reflect the fact that the self-financing agreement for local authorities had been based on 30 year projections of rental income. Greater stability would therefore be provided for long-term business planning if the increase in rent levels was confirmed for 30 years. This would enable long-term business planning for investment in existing stock and delivering new homes. In particular, we would seek reassurance that there would not be another rent reduction after 2025. In addition, we require assurance that rents would not reduce in the event of a significant decline in economic conditions. For example, if CPI was negative and fell to below minus one, protection should be provided to ensure rents would not reduce and the minimum impact would be a rent freeze. We would similarly require safeguards for affordable rents in the event of a downturn in the market, through a guarantee that properties would not be re-let at a lower rent if market rents fell.
46	Personal view	Yes			Not sure - Don't know	I am concerned that providers will misuse the standard, imposing the maximum increase each year rather than taking into account tenants' circumstances. Some HA's have heavily increased their rents for decades while tenants have not had parallel increases in income. It seems wrong that low income tenants - low earners, pensioners on low fixed pensions - pay for new housing through raised rents. We older, long term tenants who have never claimed benefits, have paid for the homes we live in several times over already. Should we be the people bearing the costs of new housing?	Not sure - Don't know	If most council tenants currently pay on average lower rents and have RTB so can move, tenants in high cost areas who rent from small HAs that charge high rents, and can't buy, will be hardest hit if it's a standard percentage increase for everyone.	No	for people like me, in my 60s, living on a pension and savings that preclude me from claiming HB but are too little to live on comfortably, already paying 60% of my low fixed income on rent, the rent will soon become unaffordable. It is really frightening.	Not sure - Don't know		Not sure - Don't know		Not sure - Don't know		Yes	As you will know from consulting tenants and the SHGP responses, many tenants have distrustful, worrying relationships with our landlords. They are not value for money, not on our side, not listening. It is frightening to think they will be able to hike our rents again so soon and for five years; I doubt any but the most ethical will resist setting the highest option. I think rents should be pegged to incomes, not national ones but tenants' median ones. Social Rents vary hugely across the UK. People with high charging landlords, should not necessarily pay the same percentage increase as those in areas where people pay a third of the rent we do. It is much harder to move in expensive areas, but for example in Yorkshire, Wales, the Midlands, some parts of the South West, tenants can privately rent a house for half my London HA flat's rent. My neighbours and I will be trapped paying higher rent increases with no affordable options to move to if we cannot pay.
47	Organisational response		Other (please explain)	Local Authority	Yes	It's a good deal and restates the original commitment	Yes	but their starting rent levels are generally considered to be at a higher level than LA's even after the 10 years convergence period that ended in 2012	Yes	although it now puts rents back under local political control rather than determines solely by commercial/business considerations	Yes	This seems to be both fair and just	Yes	This seems to be both fair and just	Yes	It would be helpful to know how this would operate and for how long as the direction references that "The Secretary of State may publish a document about the measures that the Secretary of State considers could be taken by a local authority in order to comply with section 23 and to avoid serious financial difficulties".	Yes	Housing is by nature a long-term asset, and although it is welcome that this will provide 5 years certainty over rents policy, a longer-term view that enabled and encouraged long term investment decisions would be welcome

48 Personal view	Yes			Yes	My own local authority imposed the following percentage increases in rent in the years shown: 2011/12 6.80 2012/13 7.47 2013/14 7.56 2014/15 5.14 2015/16 8.18 2016/17 -1.00 2017/18 -1.00 2018/19 -1.00 I queried the scale of increase first in 2011 and then every year to 2015, and received the response that Government rent policy applicable to registered social housing associations did not apply to local authority landlords and, as such, was considered simply as guidance which my landlord could disregard. This demonstrates that, had the Government not imposed on local authorities in 2016/17 the reductions in social rents under the Welfare Reform and Work Act 2016, average rent increases of this scale would continue to have been imposed unabated in the Borough. Notably, the excessive increases cited above were not accompanied by any improvements in either planned or reactive maintenance to the housing stock, which gave rise to the view amongst tenants and other relevant stakeholders that the authority was unable to justify them on this basis. It seemed that the rent increases were intended instead for the purpose of funding a commercial loan of £96M which the authority took out to purchase its housing stock from the Government under self-financing HRA arrangements in March 2012. . Therefore, I believe that the justification for Government intervention cited in Paragraphs 2 and 14 of Annex B is entirely appropriate and very welcome.	Yes	I agree with this proposal because it would represent equity of approach. Whilst I acknowledge that different policy and legislative approaches are required within the public, private and housing association sectors respectively, the issue of rent policy is one of primary importance to tenants, and consistency in this regard is essential. The proposed ambit of these measures demonstrates unequivocally that Government is acting in the interests of all tenants (many of whom have limited choice over their housing circumstances), irrespective of who their landlords might be.	No	I believe that the proposed increase of CPI + 1% annually from 2020/21 is too great for several reasons, namely: • using as an illustrative example the qualifying rate of CPI prevailing at September 2018 (in the obvious absence of data for September 2019), in April 2020 tenants would see reversed in the space of only one year the majority of the cumulative relief of 4.0 % gained in the previous four. Even if CPI is lower in September 2019 than it was in September 2018, the 4.0% relief gained by tenants would be reversed completely by April 2021 under the proposed formula; • by definition, tenants of social housing are those least able to afford significant increases in their household costs and rent accounts for the largest proportion of these costs. Against the back-drop of the well-publicised problems associated with the roll-out of Universal Credit, the withdrawal from UC of certain components which are included currently in Housing Benefit (for example, ground rent, use and occupation charges, and mesne profits) and less tenants being eligible overall for UC than HB, tenants would be penalised disproportionately and unfairly by annual increases at levels consistently above the rate of inflation. It seems both perverse and immoral if Government policy seeks intentionally to facilitate this situation; • in comparison, home-owners have experienced historically-low and stable mortgage interest rates over the past decade, which have allowed many to overpay their mortgages whilst not suffering undue financial detriment and most to see no noticeable increase in their housing costs during this period. • a significant development in housing policy which occurred after this consultation was launched has a direct bearing on this proposal. The Secretary of State for MHCLG removed by order dated 25th October 2018 the borrowing cap on the Housing Revenue Account, giving local authorities more flexibility to finance the building of new affordable housing from the commercial money markets via long-term borrowing on competitive terms. Several local authorities (including my own) have already established public/private hybrid housing companies as delivery mechanisms for new housing development in this manner. The removal of the cap on the HRA will have the effect of either accelerating innovative approaches such as this where they exist or facilitating them where they do not. Consequently, it is logical to anticipate that this measure will contribute to the achievement of the policy objective cited in the third bullet-point of Paragraph 10 of the consultation document, in which case annual increases in rent could be lowered without detriment to the financial stability of landlords or their housing-delivery aspirations. I suggest that you need to revise your options/sensitivity analysis in Annex B (Paragraph 19 et seq.) to address this matter. For these reasons, annual increases limited to CPI would seem a more appropriate option. Not only is it fair to tenants but taxpayers too, as it would limit increases in the annual welfare budget attributable to housing (and please note that the majority of tenants are also taxpayers and, therefore, face not only rent increases directly but the tax burden of subsidising housing welfare benefits). Reasonable levels of rent, which do not include within their formula an annual accelerator component, are thus in the best interests of all stakeholders.	Yes	I agree with the proposed direction other than Paragraph 6(3)(a) relating to CPI + 1%, for the reasons mentioned in my answer to Question 3.	Yes	I agree with this proposal because Government direction to local authorities is necessary for the purpose of preventing the excessive increases that some have imposed in the past, in the absence of such direction.	Yes	I agree with the proposed exemptions because they are reasonable in terms of the wider public interest and broadly analogous to current exemption arrangements. Tenants would be subject to significant detriment if their landlords suffered financial instability or collapse.	Yes	The ultimate sentence of Paragraph 2.14 of the draft policy statement is unduly weak. Evidence I have provided demonstrates that my own local authority disregards anything which constitutes Government guidance rather than direction and is likely to apply routinely the maximums of 5 and 10 per cent mentioned in 2.14 respectively. I acknowledge that flexibility is being offered in the setting of formula rent but I suggest that the qualification is strengthened to reflect that Government expects such measures to be employed only in exceptional circumstances and, perhaps, subject to some type of formal justification by the authority to MHCLG (if that arrangement is feasible within existing MHCLG resource parameters).
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56 Personal view									I understand that there are proposals to allow or even to insist on above inflation rent increases. [REDACTED] We have a major housing crisis, in common with most of the country. We are exploring all possible options to address the housing situation in Hastings and St. Leonards. We currently have no housing stock and so have nothing against which to borrow so could not even benefit from the extremely limited easing that is being proposed. The situation is made worse here as Hastings is one of the early ‘pioneers’ for Universal Credit and, many people, whether working or not, rely on Universal Credit. Average wages remain extremely low but housing values – renting and buying - are rising significantly faster than wages. The problems with UC are well documented and the government’s failure to address this adequately in the budget can only leave many of the most vulnerable continuing to experience stress as well as ongoing financial difficulties. We are also finding that many private landlords are refusing to take tenants in receipt of Universal Credit as the lack of certainty means that their insurance companies refuse to provide cover. This has a further dreadful impact on the availability of housing for the poorest – and Hastings is among the 20th most deprived boroughs in the country. In this context, to suggest above inflation rent rises as a way of “ensuring that providers have sufficient income with which to manage and maintain their properties” and to enable “a stable financial environment to support the delivery of new homes” is disingenuous at best and intentionally misleading at worst. Even were it acceptable to charge people above inflation rents at a time when wages have effectively stagnated for 10 years, the amounts involved will be nothing like sufficient to enable major house building. What we need is proper funding to provide social housing, that is both genuinely affordable and secure for vulnerable, and for low and middle income tenants. We need to have stable finances and the ability to build new council housing; even Conservative Councillors are now calling for council housing. And, indeed, Lord Porter, Tory Leader of the LGA has called for higher levels of house building and a return to at least 40% of that being council housing. For that councils should be able to borrow at zero or, at most, very low interest rates to build council housing and to be allowed the usual repayment periods are c. 15 years for this. Furthermore, providing council housing that can provide security and stability for councils and for tenants requires the ending of the right to buy. Anything short of this will have little or no impact on addressing the overall housing shortage and even less on meeting the needs of those who are in housing needs. I trust that you will rethink this and the Government’s Housing Policy more widely.								
57 Personal view									im totally apposed to this idea of paying an extra £8600 over the next 15yrs for nothing								
58 Personal view	Yes								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 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 you propose will deliver 166% more new housing units. 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 with its obvious political advantages as it repurposes the current proposal and removes its perversities and targets taxpayer monies with much greater efficiency Additionally, it produces lower rents that are 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 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 prevents the supply crisis we have experienced for decades by restoring a programme of capital subsidy that becomes systemic and allows all housing actors to plan with greater confidence. It develops and maximises new house building from 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. In short, this proposal gives a political solution to the UK Housing Crisis elements of undersupply and affordability and costs government not a penny more. I thank you for the opportunity and recommend you consider this alternate proposal carefully for all the above reasons.								
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61 Personal view	Yes								I am a retired person whose pension is modest but takes me just above the threshold for claiming benefits. I care very much about the housing crisis which sees young people having to pay extortionate rents and the utter lack of affordable social housing. Forcing social rents up will cost the tax payer more in benefit terms also. So, 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 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 you propose will deliver 166% more new housing units. 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 with its obvious political advantages as it repurposes the current proposal and removes its perversities and targets taxpayer monies with much greater efficiency. Additionally, it produces lower rents that are 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 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 prevents the supply crisis we have experienced for decades by restoring a programme of capital subsidy that becomes systemic and allows all housing actors to plan with greater confidence. It develops and maximises new house building from 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. In short, this proposal gives a political solution to the UK Housing Crisis elements of undersupply and affordability and costs government not a penny more. I thank you for the opportunity and recommend you consider this alternate proposal carefully for all the above reasons.								
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70	Organisational response				Yes	The rent standard needs to be consistent across the social housing sector, for both Registered Providers and Local Authorities. This allow for an easier comparison on a 'like for like' basis which is particularly relevant where Local Authorities have started a new build housing programme after Large Stock Voluntary Transfer.	Yes	The principles that both Private Registered Providers and Local Authorities provide affordable housing under should be identical, with no separation from a rent standard perspective establishing equality across social housing providers.	Yes	The proposal provides medium term certainty in terms of revenue income and supports the social rented sector's ambition to help tackle housing issues in their locality. However 5 years is still a relatively short period in business planning terms and some indication over the Policy after 5 years is needed to give RP's the risk appetite to "ramp-up" new developments" and in order to create the capacity for borrowing in the sector.	Yes	The direction in relation to capping annual increase for any rents that exceed the rent flexibility level at CPI flat and the reduction to formula rent when these properties are re-let for Local Authority stock is supportive of creating equality across the social housing sector.	Yes	However there may be a requirement of further protection for market rent tenants to ensure fair rent charges after the five years	Yes	We agree with the proposed arrangements and support the accommodation listed in Chapter 5 of the draft policy. The proposed direction to allow the Regulator to exempt a private registered provider from one or more requirements in the rent standard is required, as it is similar to the existing threshold for exempting private registered providers from social rent reduction, where RP's financial viability would be jeopardised and therefore risk profiling by their lenders would cause a potential breach in loan covenants. As this doesn't apply to LA's then yes a different approach to that is reasonable.	Yes	
71	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		No	We do not agree for the following reasons: 1.RA's have demonstrated that they are capable of self-regulation through our own governance systems and do not believe government regulation is required. 2.RAs are unlikely to be familiar with how regulation through rent standards works as up until now this has only applied to housing associations. It is therefore unreasonable to expect an informed response without providing more detail about what this will mean in practice.	No	We do not agree with this because the accountability is for different audiences. LA landlords are accountable to members and residents, as opposed to tenants and Board members.		We welcome the proposal to increase rents by CPI+1% following several years of reductions which have significantly and adversely impacted our budgets and our ability to invest in our own stock as well as build new homes, whilst still struggling to provide appropriate services. However, we believe that LAs should in fact be allowed to increase rents beyond the CPI+1% in order to catch up investment. In the context of the government announcement that the HRA borrowing cap will be lifted, we feel that local authorities need the freedom and flexibility to set rents locally as there will be an increasing pressure to use all borrowing headroom to drive new supply, placing additional pressure on our landlord function.	No	Formula rent was always supposed to be a guide, with the limit rent acting as the mechanism to stop abnormal rent increases. By setting absolute limits, or where current rents are above formula rent, LA's are being restricted to not realising the full CPI+1% within their resources. We would reiterate here the point made above relating to the requirement for local flexibility – the lifting of the HRA borrowing cap, while welcome, raises the prospect of additional pressure to use all borrowing headroom to drive new supply, placing additional pressure on our landlord function.	No	We not agree. This decision should be locally made based on local affordability assessments.				
72	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Yes, we agree that the rent stand should apply to local authority registered providers and support the proposal for the end of the rent rebate subsidy limitation.	Yes		Yes	Yes we are agree with the proposal to increase rents by up to CPI+1% each year and that the rents policy statement should strongly emphasis that this continues for a period of at least five years.	Yes		Yes		Yes		No	
73	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	An identified rental increase will support housing providers borrowing for the provision of new build social (affordable) homes. A long term consistent approach to rent increases in the social sector would provide the financial stability that is required. This will also give clarity and consistency to customers.	Yes	An identified rental increase will support housing providers borrowing for the provision of new build social (affordable) homes whether they are provide through local authorities or private registered providers.	Yes	The ability to increase rents up to CPI+1% on an annual basis is vital as it maintains sufficient headroom in local housing provider business plans to continue to develop new homes. Loans are generally secured against the value of homes and if providers were to be squeezed by a fall in the value of house prices (thought possible due to Brexit) and insecurity in terms of annual rent increases, development programmes may be cut.	Yes	With some reservations: [illegible] product. Cornwall Council would welcome the opportunity to pilot such a flexibility for the Government. •It has been proven over the last two decades that wage increases have not kept pace with housing costs – which together with welfare reform does make it harder for those on lower wages to afford their accommodation even at social rents. If the rate of wage increase lags significantly behind formula rent, the result will be a loss of affordability in real terms.	Yes	This is fair and equitable.	Yes	With reservations – [illegible] property is financially viable. Cornwall Council would appreciate being given more flexibility in terms of retaining social rented stock that is not economically viable at social rent but could be at alternative rents or as a shared ownership product. Cornwall Council would welcome the opportunity to pilot such a flexibility for the Government.	Yes	We would highlight the following statement from the draft policy statement – [illegible] more beneficial to them as a company in the longer term and if there is any further limit on rent increases in the future the decision may be made to further reduce the likelihood of their developing in more expensive areas where the affordable rent may be capped to LHA levels.
74	Personal view	Yes			Not sure - Don't know	Not clear how this will affect someone as myself: pensioner, fixed income, not on benefits.	Not sure - Don't know		Not sure - Dont know		Not sure - Don't know		Not sure - Don't know		Not sure - Don't know		No	Not sure of effect of these proposals as only became aware of them today via Twitter, so not time to consider properly.
75	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes		Yes		Yes		Yes					
76	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes		Yes		Yes		Yes		Yes		Yes	
77	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Not sure - Don't know	Applying the rent standard to local authorities appears reasonable. However circumstances can vary greatly between local authorities. Therefore the Standard should be largely guidance only and not prescriptive. This will allow local authorities to apply appropriate rents for the relevant area.	No	Local Authorities have a statutory duty to provide services and their governance processes and structure arrangements ensure these are provided. They also have a track record of fully utilising all resources to ensure services are delivered. More flexibility should therefore be granted to local authorities to ensure the requirements do not restrict them from applying the most suitable approach for the local circumstances.	Yes	The end of the rent reduction period is welcomed. However, as referred to above, rent setting should be a local decision. Moreover the Debt Settlement Payment under Self-financing was calculated on rent increases of RPI + 0.5%. RPI + 0.5% should therefore be used as a basis for rent setting or the settlement payment should be adjusted.	Yes	As referred to above rent setting should be a local decision and further flexibility should be granted.	Yes	As referred to above rent setting should be a local decision and further flexibility should be granted.	Yes	This approach appears reasonable.		
78	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes	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 policy enhances our ability to invest in existing and new housing stock. In an era where Government grant makes up roughly only a seventh of the total cost of a new home, it is especially important lenders and ratings agencies are confident about our future rental income. We also hope Government recognises the prospect of a substantial disconnect between rents and benefits should it continue its benefits freeze. If benefits continue to be frozen at 2015/16 values, there is a very real prospect even social rents will become unaffordable for those out-of-work, or relying on benefits to top up their income. For us, certainty over the future direction of Local Housing Allowance (LHA) is especially important as we have made a policy decision to cap Affordable Rents at LHA (as is implicitly encouraged in the accompanying policy statement). At a minimum, we recommend Government re-establishes the link between working-age benefits and inflation.	Yes	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 rents up to five percent above the formula rent. Our understanding was that this provision had been suspended for the four years during which rents are subject to annual one percent reductions. We would appreciate clarification on whether this provision is indeed being re-instated from April 2020.	Yes	Yes. However, there are a couple of points we wish to clarify, specifically: •Whether Affordable Rents should be reduced if, following re-basing calculations, market rents are found to have fallen. The CPI + 1% limit acts as a ceiling guarding against large rent rises in the event of rapidly escalating market rents. But the guidance is unclear on whether there is an equivalent 'floor' to guard against a reduction in Affordable Rents following a downturn in the market •The circumstances under which homes may be converted from social rent to Affordable Rent and vice versa. The guidance is not especially clear on these points. Our understanding is homes may only be converted from social to Affordable Rent as part of agreements with Homes England and the Greater London Authority – and that no current such agreements exists.	Yes		No	
79	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Yes		Yes	This acts as a ceiling and will support additional affordable new homes delivery. Flexibility should allow local board discretion reflecting the local market conditions and affordability.	Yes		Yes		Yes		Yes	The proposed direction will secure medium term planning certainty for registered providers. It will also act as a positive investment prompt for funders and support cheaper funding. For tenants it will give sensible rent inflation growth that will help budgeting and keep rents affordable.

80	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Yes, it makes perfect sense to include local authorities within the rent standard from 2020/21.	Yes	Yes, there should be a consistency of approach across the housing sector.	Yes	Yes, this was a previously announced in October 2017.	Yes	Yes, this gives an incentive to local authorities to bring rents in line where the formula rent is exceeded, allowing for the 5% (general needs) & 10% (supported) tolerances. In Winchester City Council we do not have any social rent properties that exceed the formula rent plus the accepted tolerances.	Yes	Yes, retaining the 80% of market level is sensible. We also agree that capping any annual increases for existing tenants to CPI + 1% makes sense.	Yes	Yes, this is a reasonable step.	Yes	The proposals identified in this consultation consolidate previous announcements and provide consistency across the housing sector.
81	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	[illegible]	Yes	[illegible]	Yes	[illegible]	Yes	[illegible]	Yes	This approach is supported, however the guidance needs to be clearer in the comparison of formula rent with 80% market rent to confirm the position on service charges. The comparison should be between the formula rent plus service charges and the 80% of market rent and where the formula rent plus service charges is higher this level is permitted to be set. The aim of these clauses was always to underpin investment in such areas, and the rules ideally need to be clarified so that they can be interpreted fairly.	Yes	Certain types of council housing would be exempted: •Shared ownership low cost rental accommodation •Intermediate rent accommodation •Specialised supported housing •Relevant local authority accommodation •Student accommodation •PFI social housing •Temporary social housing •Care homes Local authorities would need to seek an exemption from the overall policy from the Secretary of State. Should this policy be introduced the process must be set out well before 1 April 2020 to allow local authorities sufficient time to secure an exemption.	Yes	We welcome the recent removal of the borrowing cap and this is a positive change for Local Authorities to deliver more new homes. There are further limitations which can also be removed for Local Authorities which will further enhance the capacity and speed of delivery of build programmes to meet the Government build targets. Rents are critical to long term business planning. If a longer term framework of CPI plus 1% can be agreed this would provide certainty to underpin longer term strategic planning and financing arrangements to invest in new homes through the utilisation of prudential rules. Rents have been reduced over the last few years significantly from what would have been expected under the original self-financing regime. This has reduced the resources available for new build for Local Authorities like Newark and Sherwood which has demonstrable housing need, has maxed out the previous HRA capacity and has the skills and delivery record in build programmes. Changes have been identified through our consultation response requesting more flexibility to move to target rents for those Local Authorities where there is a demonstrable difference, taking into account affordability and the Government build targets. Changes are also identified for the Right to Buy scheme in terms of enhancing the value of receipts retained to provide a more level playing field between Local Authorities and Registered Providers. We also make the linkages to the broader Government housing priorities and how long term financial certainty, release of resources from rents and enhancing receipts from property sales will enable investment into areas such as safety and standards, underpin work to address the stigma of social housing and maintain homes at the decent homes standard focused on ensuring we provide equal opportunities for tenants irrespective of their landlords sector.
82	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Not sure - Don't know		Not sure - Don't know		Not sure - Don't know		Yes		Yes		Yes		Yes	The draft policy statement is welcome and provides clarity in rent setting and review. However, consideration needs to be given to providing registered providers with flexibility in changing rental tenures. The proposed policy does not allow for any flexibility in changing rents for properties at the point of relet. RPs ought to be able to change the rental tenure of properties in response to local market conditions, for example, converting a social or affordable rented property to intermediate where there is a lack of demand. Without this flexibility properties could be lost to the rented market entirely as a result of having to dispose of the unit through sale rather than being able to explore other options. Rents for social tenants with high incomes cannot be set effectively unless RPs have the powers to review people's incomes.
83	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Not sure - Don't know		Yes				Yes	We believe it is important to ensure that rents are set at affordable levels for our tenants, but that it is also necessary to balance this with receiving enough income to invest properly in maintaining our homes and building new ones. We would support any opportunity to engage with the Government on the long-term sustainability of the affordable rent model, including undertaking affordability modelling.	Yes		No	
84	Organisational response		Other (please explain)	Arms Length Management Organisation	Yes	[illegible]	Yes	[illegible]	Yes	[illegible]	Yes	[illegible]	Yes	This approach is supported, however the guidance needs to be clearer in the comparison of formula rent with 80% market rent to confirm the position on service charges. The comparison should be between the formula rent plus service charges and the 80% of market rent and where the formula rent plus service charges is higher this level is permitted to be set. The aim of these clauses was always to underpin investment in such areas, and the rules ideally need to be clarified so that they can be interpreted fairly.	Yes	Intervention from the Regulator and Secretary of State is supported to provide flexibility where compliance jeopardises the financial viability of a Local Authority HRABP or RP.	Yes	We welcome the recent removal of the borrowing cap and this is a positive change for Local Authorities to deliver more new homes. There are further limitations which can also be removed for Local Authorities which will further enhance the capacity and speed of delivery of build programmes to meet the Government build targets. Rents are critical to long term business planning. If a longer term framework of CPI plus 1% can be agreed this would provide certainty to underpin longer term strategic planning and financing arrangements to invest in new homes through the utilisation of prudential rules. Rents have been reduced over the last few years significantly from what would have been expected under the original self-financing regime. This has reduced the resources available for new build for Local Authorities like Newark and Sherwood which has demonstrable housing need, has maxed out the previous HRA capacity and has the skills and delivery record in build programmes. Changes have been identified through our consultation response requesting more flexibility to move to target rents for those Local Authorities where there is a demonstrable difference, taking into account affordability and the Government build targets. Changes are also identified for the Right to Buy scheme in terms of enhancing the value of receipts retained to provide a more level playing field between Local Authorities and Registered Providers. We also make the linkages to the broader Government housing priorities and how long term financial certainty, release of resources from rents and enhancing receipts from property sales will enable investment into areas such as safety and standards, underpin work to address the stigma of social housing and maintain homes at the decent homes standard focused on ensuring we provide equal opportunities for tenants irrespective of their landlords sector. On page 22 of the Policy Statement on Rents for Social Housing there is a table which outlines formula rent caps for 2019-20 however the detail inserted is rent cap levels frozen at 2015/16 which is assumed to be an inputting error.
85	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	Selby support the proposed rent standard applying from 2020.	Yes	This requirement would support the principle that social tenants throughout England should receive a similar level of affordability and protection.	Yes	[illegible]	Yes	[illegible]	Yes	Selby agree that for rent to remain affordable when being re-set, it must be no more than 80% of market rent. In principle, we also agree that tenants should not be subject to excessive rent increases via the rent re-setting process. However, if a tenant is choosing to move from a social to affordable rented property and the affordable rent is being re-set for an existing tenant in these circumstances, subject to the tenant being aware of the rent difference, they should be charged the current affordable rent and providers should not be limited by the rent increase cap. Again, flexibility to make these decisions locally would be welcomed.	Yes	There should be an opportunity for exemptions for private registered providers if financial viability is in question, in the same way there should be for local authorities. Points 3.35 and 3.36 of the current Rent Standard permit waivers from the standard in particular circumstances and subject to evidence being provided. We would like to see these points remain in the new proposed Rent Standard, ensuring a 'level playing field' and financial viability for any provider complying with the Rent Standard.	Yes	As set out at Question 3, Selby generally welcomes the proposals however, acknowledging the need to control the cost of housing benefits, we would again argue that decisions over HRA rent levels should be at the discretion of locally elected members who represent the interest of tenants. We are also concerned that such policy has the potential to be revoked or reconfigured before the five year minimum, leading to financial uncertainty for registered providers. In the past, Government spending reviews and budget proposals have altered social rent standards with little warning and made future financial planning very difficult. Selby would therefore support the proposal of a minimum of five years, but also stress the importance of maintaining this commitment. As a local authority, we need the ability to effectively plan investment in our properties, and providing a stable and predictable rental income would assist with this.
86	Organisational response				No	[illegible]	Yes	[illegible]	Not sure - Don't know	[illegible]	Yes	[illegible]	No	As referred to above, we believe that local authority rent setting should be based on guidance rather than a direction. However, we acknowledge that no major changes are being proposed to the requirements previously set out in the Guidance for Rents in Social Housing, and would not object to the content being incorporated into a new guidance document rather than a direction for local authorities.	Yes	As referred to above, we believe that local authority rent setting should be based on guidance rather than a direction. However, we acknowledge that no major changes are being proposed to the requirements previously set out in the Guidance for Rents in Social Housing, and would not object to the content being incorporated into a new guidance document rather than a direction for local authorities.	Yes	We do not agree with the proposal in paragraph 36 that in the first year rent increases should be based on the average rent in the previous year. This would be difficult to implement administratively. If rents have moved to formula rent during the previous year (e.g. on re-let), then CPI+1% should be applied to that formula rent in 2020/21. We note reference to Universal Credit within the paper and wish to use this opportunity to express our concerns about its impact on local authority rent arrears, which in turn will be detrimental to HRA Business Plans and will hamper our ability to invest in stock and services. We would urge the government to re-consider and ensure that the housing element of Universal Credit is paid directly to local authority landlords to guarantee income levels.
87	Personal view	No			No		No						No		No		No	
88	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes			[illegible]	Yes		Yes		Yes		No	
89	Organisational response		A body representing the interests of tenants of registered providers		Not sure - Don't know	I am not sure if I fully understand the proposal- page 11 point 22 makes reference to "high income social tenant household" which has echo's of "pay to stay" ?	Not sure - Don't know	[illegible]		[illegible]	Not sure - Don't know	[illegible]	Not sure - Don't know	the The Direction on the Rent Standard 2018 is written in lawyers language rather than plain English. The term affordable rent is widely acknowledged as Orwellian and includes in the GLA London Plan "rent products" that cater to households with incomes of £60-£90 K. The bottom line is that contrary to mainstream media narrative and the stigma that has been attributed to "subsidised " housing - the residents of social housing are struggling to make ends meet and unable to withstand any major increase in rent. It is often forgotten how much direct and indirect subsidy is afforded to the owner occupier and buy to let sectors of the housing market. Social housing rent & service charges should be set at around 25% of net income.	No	If this amounts to an opt out based on a providers financial viability figures (which can be manipulated) and hence facilitate higher rent levels - NO	Yes	I unfortunately have only just read the draft policy now with less than an hour before the consultation deadline. I have reviewed some questions and not sure if deleted part of my response in error. This policy seems very bad news for social housing tenants- the formula rent is going to make social housing impossibly expensive in areas of high property values and proximity to high income neighbourhoods which does nothing for mixed communities. However I realise that this consultation started 8 weeks ago and I have only read it tonight may have misinterpreted it. I would appreciate a chance to submit a late response. •Rent & service charges levels for social housing should be pegged at 25% of net household income. •There should be one social rent for all social housing properties for existing and new tenancies •Up to 80% of gross market rent is not affordable for social housing •Housing subsidy has been previously (Miras) and is allocated both directly and indirectly (e.g. RTB, Help to Buy, Buy to let, no capital gains on main residence), to the private market. •Currently social housing tenants are subsidising their landlords new developments when quite often their own homes are not being properly maintained •Re Chapter 4-it is imperative to distinguish between social housing tenants with high incomes from households e.g. 3 or 4 people in one household could be on low incomes with combined amount over £60k. Practically speaking as long as RTB with discount exists this policy aspect would be counter productive.
90	Organisational response					[illegible]		Gravesham BC agrees that the same requirement should apply to both Local Authorities and private registered providers. The changes will promote consistency between the housing providers.		Gravesham BC agrees with the proposal to permit registered providers to increase rents by up to CPI+1% each year. Gravesham BC's medium term plan is to not only to build new homes but to maintain the condition of our current stock through a variety of programmes including replacements, improvements, and health & safety. Surplus funds generated through the rental stream are ring-fenced and used alongside the major repairs reserve to ensure that tenants are provided with an acceptable standard of accommodation. The proposal to move toward an increase in rents to CPI+1% will provide the HRA with some short term certainty around budget setting and the maintenance of current stock, as well as providing the mechanism to help deliver new build properties. This will potentially provide Gravesham BC with an opportunity to increase the reserves and reduce the risk of future funds not being readily available to carry out works, or be able to more favourably consider prudential borrowing as a means to delivering new social homes. Furthermore, the additional income generated will help to decrease any risk of properties falling into disrepair. Whilst Gravesham BC welcomes the proposal to increase the 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.		Gravesham BC agrees with the proposed direction as it relates to social rent properties. The proposed direction is reaffirming that formula rent is a limit on the initial rent on a social rented property which should be applied. This would provide Gravesham BC with the ability to set a lower rent should it be deemed the limit rent would have a negative impact on local economic growth or it would not be in line with the demographics of the Borough. In our current position, the proposed direction will have an inconsequential impact to Gravesham BC as stock which exceeds the formula rents, i.e. affordable homes, are excluded from the direction. Although the direction permits flexibility levels of 5% and 10%, subject to rent caps, Gravesham BC have historically not applied the flexibility levels to the housing stock. However, Gravesham BC do support the flexibility provided within the policy to enable the application of flexibility in the future, should it be deemed necessary. In future, should the flexibility levels be applied to the housing stock, and if the increase exceeded limit rent, it would be subject to a reduced annual rate of CPI until the rent is brought within the flexibility level. Assuming the flexibility levels will remain unapplied the impact should remain negligible.		Gravesham BC agrees with the proposed direction as it relates to affordable rent properties, including the proposal relating to the re-setting of affordable rent. When reviewing the re-letting element of the proposal, there are two scenarios that should be considered. •The impact of re-letting properties to existing tenants: if the decanting of a tenant into a different property is at the request of Gravesham BC then a social rent would apply regardless of the categorisation. In this instance, affordable rent could not be applied. •The tenant requests a move to a new property: this scenario would see an impact to Gravesham BC as affordable rents, under the current direction, can be freely applied. The proposed direction would permit an increase for current tenants of only CPI+1% which would reduce the income from affordable rents. The rent application under the new direction would in fact be current rent with an enhancement of CPI+1% so long as this does not exceed target rent. If it exceeded target rent, it would be capped. Gravesham BC are compliant with charging affordable rent on properties which have been built as part of our new homes development or increasing our stock via exercising our option to buy back ex-council homes (within 10 years of original sale) and purchases acquired from the open market.		Gravesham BC agrees with the proposed arrangements for making exemptions from the rent standard on financial ground. In September 2015 a briefing paper was presented to the Housing Cabinet Committee in respect of the discretionary scheme to apply the exemptions from household with an income in excess of £60,000. It was evident from the cost benefit analysis which had been undertaken that the additional time and resources needed to undertake the monitoring of such information would not be financially beneficial. Therefore the general consensus within the Committee was not to implement the scheme until it was made compulsory. The proposed arrangement to allow Regulators to exempt a private registered provider if it were in jeopardy of impacting the financial viability of the provider, would not have any impact on Gravesham BC, as the requirement on financial viability do not apply to Local Authority providers.		
91	Organisational response	No			Yes	[illegible]	Yes	Answer as 1 above – really LAs are under greater pressure as a result of the lack of compensation for RTB losses	Yes	As the Capital Economics report for SHOUT and the LGA showed earlier this year, CPI plus 1% strikes the right balance between increased delivery of new homes and affordability for tenants. What is really required is a much longer period of certainty (ideally 30 years or at least 10 years) about this as the guideline for future rent increases to increase investor confidence in the long term viability of social housing whether delivered by Councils or Registered Providers.	No	It is understood that a new form of restraint on rents will be required following the introduction of Universal Credit, so the general principles contained within the proposed direction are generally acceptable as they mostly balance that restraint with an element of flexibility on re-let which allows a long term rebalancing of appropriate rent levels. Ideally the rent cuts of the 2016-2020 period would be reversed to allow more funding for new homes as originally planned and that was possible before those reductions. This would add significantly to Councils and Registered Providers' capacity and would restore the original subsidy system settlement from 2012 to broadly its previous position. If this is not possible, then we would propose that at least the final year of rent convergence is finally permitted in the transitional year 2020. This would be one year where a RPI plus 0.5% (or CPI plus 1%) plus £2 a week is allowed one final time – solely for those properties whose rent is below formula rent. This could be achieved by means of redefining the '2020 limit' definition in the proposed direction to allow up to £2 a week to be added to the current rent where the existing rent is below formula rent (with a cap of formula rent). Such a change would show that the government remains committed to the original intention to make rents fairer across the country. It would of course be for individual Councils to determine whether to use such flexibility.	Not sure - Don't know	In general the direction is acceptable, but the comparison of formula rent with 80% market rent needs to be on a comparable basis – either both excluding or both including service charges. As drafted, it could be interpreted that only where the formula rent alone (excluding service charges) is higher than 80% of market rent including service charges can formula rent be applied. In reality, a comparison should be between the formula rent plus service charges and the 80% of market rent and where the formula rent plus service charges is higher this level is permitted to be set. As stated in the policy statement at 3.2, the aim of these clauses was always to underpin investment in such areas, and the rules ideally need to be clarified so that they can be interpreted fairly.	Yes	It is always worth having a clause that enables someone appropriate to intervene in extremis.	Yes	Rents are critical to long term business planning. If a longer term framework of CPI plus 1% can be agreed this would add significant resource into long term plans and ability of both Councils and Registered Providers to borrow to invest in new homes. Rents have been reduced over the last few years by about 13% from what would have been expected (about 9% in real terms) and this has had a restraining effect on investment. The proposals are generally welcome as moving in the right direction but there are further improvements that can be made. The long term future of social housing is important for the country to sustain access to appropriate housing for as many people as possible. Without a sustainable long term framework, insufficient investment will continue along with too many properties being sold at too great a discount and the overall homelessness position will continue to deteriorate at much greater (public) expense.
92	Organisational response				Yes	Whilst we welcome the return of CPI+1% for five years, we call for a longer term commitment in order to ensure the ambitious plans for building homes can be delivered. Paragraph 17 of the consultation recognises the need for a stable financial environment to support the delivery of new homes. A surety of rent for a rolling ten years will be co-terminus with our Investment Strategy.	Yes	[illegible]	Yes	Comment: As in question 1 above, whilst we welcome the return of CPI+1% for five years, we call for a longer term commitment in order to ensure the ambitious plans for building homes can be delivered. Paragraph 17 of the consultation recognises the need for a stable financial environment to support the delivery of new homes. A surety of rent for a rolling ten years will be co-terminus with our Investment Strategy	Yes	The consultation states that there is no major change in relation to the social rent. We would call for definition of social rent to be extended to a flexibility level anywhere between social and affordable rent. A number of grants are only awarded if houses are delivered at Social Rent. In Leeds, 70% weighting of the current formula rent formula is based on the average earnings for West Yorkshire at the turn of the century along with a 30% weighting for property valuation. The relative wealth of Leeds in comparison with its neighbouring authorities has increased over the years. This means that a higher social rent could be more easily met by some tenants of Leeds than other authorities. This additional rent could be used to invest further in a programme of Housing.	Yes	The consultation states that there is no major change in relation to the affordable rent. We support the proposal that when re-letting a vacant affordable rented property should be no more than CPI +1% in order to protect tenants from excessive rent increases. Leeds City Council has not set rent levels by revisiting 80% of the market rent on a newly vacated affordable rented property. The consultation makes mention to re-letting accommodation to an existing tenant. This would be applicable if a tenant was on a fixed term tenancy. Clarification of an 'existing tenant' is needed. Is this applicable to just a tenant who is in that specific affordable housing? Or is this applicable to any existing tenant (so will include those tenants who may move from their current council home into a different affordable housing unit).	Yes	We agree that in circumstances where the Secretary of State has agreed that it would be inappropriate to apply this rent policy to the accommodation because this would cause the authority unavoidable and serious financial difficulty that the rent standard should not apply.	Yes	The rental policy is a key element to the sustainability of Housing Growth. A long term plan is required in order for the HRA to be workable with the impact of RtB on stock levels meaning the need to build social and affordable housing has never been more pressing. Surety of policy over a rolling ten-year basis will allow authorities to plan more effectively.
93	Personal view	Yes							No	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 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 you propose will deliver 166% more new housing units. 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 with its obvious political advantages as it repurposes the current proposal and removes its perversities and targets taxpayer monies with much greater efficiency. Additionally, it produces lower rents that are 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 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 prevents the supply crisis we have experienced for decades by restoring a programme of capital subsidy that becomes systemic and allows all housing actors to plan with greater confidence. It develops and maximises new house building from 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. In short, this proposal gives a political solution to the UK Housing Crisis elements of undersupply and affordability and costs government not a penny more. I thank you for the opportunity and recommend you consider this alternate proposal carefully for all the above reasons.										

94	Personal view	Yes			No	The principle that rents for housing associations and local authorities should be regulated together is accepted. However, The Rent Standard is only a 'direction' from the Government to its regulator (the Regulator of Social Housing); neither this direction, nor the Standard itself, are legally enforceable by tenants, this is weaker than the current statutory control and is not acceptable. The poor regulatory track record of the former regulator (the Housing Corporation) and its successor bodies (including the current Regulator of Social Housing),meant that housing association rents were allowed to escalate above those of local authorities in the same areas. Eventually central government was compelled (in 2002) to overreach the Housing Corporation and directly issue specific rent convergence guidance to require the harmonisation of rents between housing associations and councils. Seventeen years later the Regulator of Social Housing is still not effectively enforcing this guidance and cannot be entrusted with local authority rent controls. (The questionable calibre and competence of the former regulatory section of the Housing Corporation, from which the current Regulator is derived, was demonstrated in 2006 when Parliament had to pass emergency legislation to retrospectively legalise consents and decisions Housing Corporation officers had made for which it was discovered they had had no delegated power to make – see section 1, Housing Corporation (Delegation) etc. Act 2006). The current framework of statutory rent control (under The Social Housing Rents (Exceptions and Miscellaneous Provisions) Regulations 2016) is therefore preferable. The current statutory rent setting and control regulations should be amended and maintained so that tenants and their legal representatives can enforce their rights to regulated rents directly. A Rent Standard is too easily breached; the Regulator has a poor track record in using its enforcement powers, a track record that has been repeatedly condemned by Parliamentary Select Committees as ineffectual, overly conservative, and too accommodating to the opinions and advice of housing association managements to the detriment of tenants.	Yes	Yes, the present statutory rent control framework should be maintained in an amended form.	No	Rent increases should be limited to CPI only. There is no evidence the housing association sector requires above inflation rental incomes to be reintroduced [illegible]	No	Statutory rent control for social rental properties should be retained and CPI+1% should not be re-implemented. In addition, the Regulator's track record on rent control enforcement for housing associations is too poor. Many housing associations have unlawfully 'converted' properties to market or near-market rents (despite being charities) and the Regulator has taken little or no action to investigate or reverse these abuses.	No	Statutory rent controls should be maintained and 'Affordable Rents' should be repealed and replaced with 'target' social rents in all cases. If Affordable Rents are to be retained then re-letting provisions must prevent any further escalation of rents for hard-pressed working tenants and retirees.	No	The handling of exemption requests from registered providers to exempt them from already too-weak rent control provisions should be removed from the purview of the Regulator and transferred to professional oversight by the Rent Officer Service (VOA). The Regulator has no expertise or suitably trained staff to adjudicate on these matters and has not proven fit to manage (and prevent abuses of) the former Rent Standard to the benefit of social housing customers.	Yes	So-called 'intermediate rents' exist now only because of the Regulator's former incompetence and inability to police rent control effectively which allowed this rogue category of near-market rental accommodation to emerge within what was supposed to have been a regulated sector; this malpractice became so widespread, especially in newly registered and for-profit providers (because of the Regulator's weak regulation and poor registration decisions) that it has had to be retrospectively legalised through the Social Housing Rents Regulations. The sham of 'intermediate rents' has been used to drive out key workers and sell off housing stock (for example by Peabody in the former Crown Estate properties in London). Intermediate rents should be outlawed under fresh statutory rent controls and replaced with genuinely affordable social rented housing.
95	Organisational response				Yes	It is accepted that an element of control is desired over the level of rents set in social housing, and as such the adoption of the rent standard for all registered providers may be the best route to achieve the consistency sought when rent restructuring was first introduced. The route through which many local authorities are able to charge affordable rents, i.e.; by virtue of having entered into a right to buy retention agreement, must be considered in any application of the rent standard to local authorities, as must some of the differences that exist between private registered providers and local authorities, where there may be greater operational constraints placed on local authorities.	Not sure - Don't know	If the same requirements are to be placed on both local authorities and private registered providers, there must be consideration given to achieving 'a level playing field', recognising the requirement for local authorities to sell dwellings under the right to buy for example.	Yes	The proposal to permit registered providers to increase rents by up to CPI plus 1% from April 2020 is supported, and following confirmation of the government's intention to do this, has been built into our financial assumptions, allowing the delivery of more much needed affordable homes in Cambridge. Any deviation from this clear intention would detriment our current investment plans.	Yes	We welcome the option for a local authority to be able to choose to charge lower than formula rents (with flexibility), allowing decisions to be taken that consider specific housing need, in the context of financial viability at a local level. We support the principle of an approach to bring into line those social tenancies where rents are currently higher than the flexibility levels, but as this does not impact Cambridge City Council, recognise that other respondents will have alternative views, when comparing the positive impact on their residents, with the potentially negative impact upon their business plans.	Yes	Although the affordable rent regime allows us to charge up to 80% of market rent, local policy is to cap our affordable rents at the Local Housing Allowance, as 80% of market rent is not deemed affordable in Cambridge. We welcome the suggestion that existing tenants should be protected from large rent increases after 2020, but would like to highlight the impact that protecting some residents causes when trying to explain rent levels to tenants in neighbouring properties, particularly as the social housing regime has been seeking to achieve 'consistency in rent levels' for many years.	Yes	We support the proposal that arrangements for making exemptions from the rent standard for local authorities should be introduced. We would seek clarity over the process for this, and guidance about the nature of exemption that may be considered by the Secretary of State.	Yes	Cambridge City Council would welcome reform of the Broad Rental Market Area (BRMA), recognising the specific housing issues experienced in Cambridge City particularly, and the inequity with rental levels elsewhere in the currently identified broad rental market area.
96	Organisational response				Yes	The rent standard should be adhered to by all Social Housing Landlords. However the current proposals are too restrictive and more flexibility on the level of rents should be afforded to local authorities.	Yes	Creates a 'level playing field', consistent approach and transparent.	No	No, this Council believes that Housing providers should have local flexibility to set rents in order to meet local needs and customer expectations within the context of the local market. Further rent cuts / freezes will have a further negative impact on an organisations ability to invest in the current housing stock / creation of more dwelling units. Rent increases will help to cover inflationary and contractual price increases and enable future investment.		Again the current restrictions in terms of rent increases are too inflexible, particularly when the formula rent level is reached. Local authorities should be in a position of taking local market factors into account when deciding on rent levels.	No	Again more local flexibility is sought.	No	This gives private providers preferential treatment	No	
97	Organisational response				Yes	As the transition to Universal Credit continues it would be sensible to establish a methodology for rent setting that can be applied by local authorities and give more certainty over rent and therefore welfare costs.	Yes	Consistency across local authorities and private registered providers would be beneficial particularly to individuals if they are moving from a local authority property to a private registered provider property so that there is consistency over the rent applied to properties.	Yes	The certainty of rent increases for a minimum of a five year period is welcome.	Yes		Not sure - Don't know	The paragraph referred to the re-setting of rent as a result of re-letting to existing tenants is unclear. This could be (and has been) read as a restriction on the rent that could be charged if the property is let to an existing tenant as the rent would have to be based on the existing tenant's current rent. This would be an issue if the existing tenant rented an older / smaller property at a much lower rent and this rent could only be increased by CPI+1% if the existing property moved to the affordable rented property being re-let? Paragraph 3.16 needs to be reviewed to ensure it is clear how this would be applied.	Yes	We assume that the exemption from the rent standard would only be made in extreme circumstances with due regard for stakeholders.	Yes	Further comment on rent flexibility would be welcome to allow providers to change rent levels where the impact of welfare reform (for example bedroom tax) means that certain properties are no longer affordable to tenants. Flexibility in setting the rent in these circumstances would make it easier to house people in an affordable way without impacting on the welfare bill.
98	Organisational response				Yes	Yes as it will give a degree of security about income levels for the next five years.	Yes		Yes	Yes as long as the starting point for 2020 rents is set at a reasonable level.	Yes	Yes, we are agree with the proposals.	Yes	Yes, we agree with the proposals.				
99	Organisational response				Yes	Broadly yes, but clarification is required on re-letting properties at formula rent where they have not reached convergence.	Yes		Yes	Yes, as it still give flexibility as it is a ceiling not an enforced level. Locally, lower increases would be allowed where circumstances permit. The issue for LAs is that a long-term commitment is required on rent income levels. Certainty of future cash flows is essential in order assess affordability of borrowing for new build programmes and management/maintenance of all HRA properties	Yes	Broadly yes. Some clarity is required regarding moving properties to formula rent at re-let. Does paragraph 6.2 of the draft direction indicate that re-let at formula is allowed? •6.2: The maximum weekly rent for a new tenant is formula rent" However, paragraph 3.1.b indicates that rents can be set at up to 5% above the formula rent. Where LAs set rent at this higher level, does paragraph 6.2 mean that they have to be re-set at formula rent on re-let?	Yes	Broadly yes. However, some clarification is sought regarding the re-letting of accommodation to an existing tenant. Does this mean that an existing tenant of the LA but who wants to transfer to the affordable rent property would be classed as a "tenant under a new tenancy" (7.6.a)? Would the affordable rent be reassessed and re-set at 80% of market rent in this circumstance? Further clarity is sought regarding the affordable rent (inclusive of service charges) to be up to 80% of market rent and the comparison of this value to the formula rent. The Draft Rent Direction, paragraph 7.3 states "If the formula rent is higher than 80% of the weekly market rent for the tenant's accommodation the maximum weekly rent (exclusive of service charges) is formula rent" Does this indicate that service charges can be levied in addition to the formula rent for the property even where the affordable rent would then be higher than 80% of market rent? The use of the word "exclusive of service charges" seems to indicate this?	Yes		Yes	Further clarity is required on whether LAs can re-let properties at formula rent. Rotherham currently has approx. 15,000 properties with rents lower than formula, which is approx. 75% of the HRA stock. Point 2.17(b) of the draft policy statement indicates that where the rent for a property exceeds the rent flexibility level, the provider must set a rent that does not exceed formula rent (plus the rent flexibility level) when the property is re-let. Point 6.2 of the draft direction reads "The maximum weekly rent for a new tenant is formula rent". Does 6.2 prohibit re-letting a property on a rent that is above the formula rent even if it is within the flexibility level?
100	Organisational response	No			Yes	Your Housing Group agree that the rent standard should apply to local authority registered providers from 2020. This will enable a consistency of approach for both providers of social rent properties and for customers and ensure greater transparency across the sector.	Yes	Your Housing Group agree that the same requirements should apply to both local authority and private registered providers. Further clarity would be welcomed around the issue of conversion, where local authority rents may be currently set at a lower level. Has the discussion around what this may look like and how it may be implemented been considered by government?	Yes	Your Housing Group welcomes the proposal to return to a position of increasing rents by up to CPI+1% each year and is supportive of this. However, it should be noted that the effects of the previous social rent reduction, which required providers to reduce rents by 1% for a period of four years, are considerable and will not be fully ameliorated by this proposal. Rents under the new proposal will be starting (by the governments own calculations) at a rate 12% lower than they would have been had CPI+1% continued to apply during the four-year period. This reduction has had a significant impact upon registered providers income, and their ability to operate effectively and has been detrimental to their ability to build much-needed affordable homes.	Yes	Your Housing Group agree in principle with the proposed direction as it relates to social rent properties. There are some concerns in relation to how the proposed direction applies to properties which are currently below formula rent, in terms of the ability to only bring them up to formula level once a property is re-let following vacancy, as this does not permit for flexibility in changes in local or individual circumstances.	Yes	Your Housing Group agree in principle with the proposed direction as it relates to affordable properties, including the proposal relating to the re-setting of affordable rent. Further clarity is sought over the practical application of charging higher than social or affordable rent to social tenants with incomes in excess of £60,000. This would always be working retrospectively in terms of information gained from the previous tax year (i.e. information from the 2018/19 tax year being used as a guide to calculate the rent for 2020/21) and therefore is at risk of inaccuracy. It is also not clear how registered providers will discover this information in order to apply the higher rent other than through tenant declaration, and assessing and adjusting such rents in the event of a sudden change of circumstances could prove difficult.	Yes	Your Housing Group agree with the proposed arrangements for making exemptions to the rent standard on financial grounds, noting that this mirrors the current approach for private registered providers	Yes	Overall, Your Housing Group support the proposed proposals and direction contained within the Rents for Social Housing Consultation. The proposal for the reintroduction of the CPI+1% formula, and for this direction to last for five years will allow the ability to plan income with greater certainty and help in the provision of a more stable financial environment. It is noted that increases to rents may adversely affect tenants not in receipt of housing benefit and the equality impact of this will need to be considered. Your Housing Group has noted with interest the modelling of costs and benefits contained within Annex B. Although the need to keep any increases to welfare spending at a minimum are noted and understood, the effects of the previous 1% rent cuts have seriously affected the capacity and effectiveness of registered providers and have had a considerable impact upon their ability to maintain and build affordable homes. Therefore, although the CPI+1% increase is welcome, the ability to raise rents at a higher rate than CPI+1% would have gone some way to redressing this impact and to tackling the housing crisis, and this is hopefully a proposal that can be revisited in any further dialogue.
101	Organisational response				Yes		Not sure - Don't know		Yes		Yes		Yes		Yes		No	
102	Organisational response				Yes	We agree, since this provides a consistent approach across all providers with the added advantage of removing the rent subsidy limitation deduction. As far as Havering is concerned, our current rent levels are below the proposed caps, identified in appendix a, of the Policy Statement. Therefore the changes will have a minimal effect on the Authority as things stand.	Yes	As stated above, the proposed change will lead to greater consistency, and should lead to greater clarity for tenants of all providers. These changes are therefore worthwhile for all part of the social housing sector	Yes	Yes as this will generate income growth to enable registered providers to deliver much needed additional supply of affordable housing. This will provide greater certainty for both tenants and providers. We would query on what basis CPI + 1% has been chosen rather than RPI + 1%? Also, whilst we appreciate that the change is a positive step, there is still the uncertainty as to what happens after the initial 5 years, which could have a significant impact on local authorities' 30 year business plans.	Yes	We agree in principle, but the rent setting seems at odds with provisioning new supply at social rent. The valuation element will be based on EUV, not market value. This suggests providers will need to set rents at affordable levels to achieve payback. The 5% or 10% flexibility levels provide help to Local Authorities who are transitioning to the new rent levels, but are unlikely to affect Havering.	Yes	This proposal brings the permitted increases in social rent and affordable rent in line, which makes sense in term of consistency and clarity for providers and residents.	Yes		No	
103	Organisational response				Yes	Broadly agree with the principle that social tenants should receive a similar level of protection whether they rent from a local authority or a different registered provider. Agree that it would give more clarity for a local authority provider.	Yes		Yes		Yes		Yes	The council does not have any objection to the permitted maximum increase of CPI + 1% increase when resetting of affordable rents at re letting.	Yes		No	
104	Organisational response				Yes	The DCN welcomes the Direction on the Rent Standard from 2020 and the Ministry's policy statement. We believe that the Direction provides certainty for district councils in budget planning for the Housing Revenue Account over a reasonable period. This will help support Councils' plans to borrow and invest in building new social housing. It provides similar certainty for Registered Providers when seeking private finance and planning for future investment in affordable housing.	Yes	The DCN agrees with the policy to include local authority housing providers within the scope of the Regulator of Social Housing rent standard alongside housing associations. This brings consistency and clarity across the sector.	Yes	The maximum rental increases of CPI+1% provide security and certainty for social housing tenants. However, there remains a concern about affordability for social housing tenants. Rent increases based on inflation depend on incomes also rising in a similar way. However, incomes from wages or from welfare benefits are not increasing in line with inflation and there is a risk that tenants will struggle to afford rent increases. 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 circumstances and to be flexible in setting lower rent increases when appropriate. This is particularly encouraging for local authorities' investment in new Council housing when coupled with the proposals within the Social Housing Green Paper to abandon the proposals for enforced high value sales of Council housing; the recent announcement to lift the HRA borrowing cap; and the possibility of changes to the rules on recycling Right to Buy receipts.	Yes	We agree with the proposed direction for social rent properties, which will encourage social landlords to continue to invest in new housing charged at social rent levels. However, we regret the current ongoing inflexibility of the enforced rent reduction for the 4 years from 2016/17 to 2019/20, which continue to impede local authorities' ability to invest in social housing.	Yes	including the proposal relating to the re-setting of affordable rent? We welcome the restrictions for rent re-setting for affordable rent properties, for example on renewal of fixed term tenancies. This will provide some protections against large rent increases for existing social housing tenants.	Yes	We agree with the proposed arrangements for local authorities to apply for exemptions from the rent standard where it would be financially unviable, which will allow for flexibility in the system to take account of local conditions.	Yes	We call on the Secretary of State to extend the guaranteed period for the new Rent Standard to 10 years rather than 5 years. This would provide greater confidence for social landlords to plan their investment in new homes and greater certainty for social housing tenants of the affordability of their accommodation.
105	Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)		Yes		Not sure - Don't know		Yes	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 to10 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 Homes England, whereby providers are making commitments over a period up to 2028/9, often predicated on the delivery of substantial numbers of affordable homes for rent at both social and affordable rents. The successful construction of these urgently needed additional new homes will be dependent on the rental streams which can be generated, and a prolonged period of assurance around maximum rent increases 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 proposed wording, in that prior to the four year rent reduction period, social landlords had the absolute discretion to add the permitted uplifts to formula rents, to reflect local conditions. The regulator's 2015 Rent Standard Guidance said: "Once formula rents have been calculated, registered providers have flexibility to set rents at up to +5% of the formula rent. For supported housing, the flexibility is +10% of the formula rent. This is intended to allow registered providers discretion in dealing with local factors". The proposed wording in the new draft policy statement introduces an important qualification to this, as follows (para 2.14): "….. the policy contains flexibility for registered providers to set rents at up to 5% above formula rent (10% for supported housing……). We expect providers to use this flexibility in a balanced way, and not set all rents at 5% (or 10%) above formula rent." We believe that this new wording will introduce a significant level of uncertainty which is at odds with the Government's intention of creating greater stability. What does 'balanced' mean, and who defines it? Could the interpretation change over time? How will the regulator enforce this aspect of the new standard? As a whole, we understand that the sector has been responsible in applying rent flexibility. However we are aware that practice varies between providers, who have used this discretion in very different ways. For example if as an association, we operate in low value areas where average rents are significantly below national levels, the use of permitted flexibility would be maximised, particularly on relet. This also partly offsets the impact of a significant number of historically low rents, which remain below formula rent levels even without the tolerances applied. Whilst we believe that this is a completely justified approach given pressures to increase supply, is it balanced? At worst we are concerned that a more rigid interpretation of the term, could lead to a significant proportion of rents being found retrospectively to be non-compliant with the new rent standard, with providers being faced with the obligation of managing them down over time, at least in real terms. This could have a significant impact on business plans, and in turn, the ability to support the development of new homes for rent. We therefore propose that the second sentence of 2.14 is removed from the proposed policy statement, restoring absolute discretion to providers. Alternatively the sentence could be reworded to clarify that the expectation of 'balance' applies to the sector as a whole, rather than individual providers.	Yes		Yes	An additional consideration to note is LHA (Local Housing Allowance) and whether as affordable rents continue to increase, will the LHA stretch far enough. If not, then this could result in some additional shortfalls and difficulties for organisations	Yes		No	
106	Personal view									Throughout the massive cpi +1% increases I had before the reduction years every time I complained my Housing Association would act in astonishment saying "why are you worried Housing Benefit will pay the increase" Housing Associations were so used to tenants being on Housing Benefit that they forgot about those struggling to pay rent. That increase used to wipe out my pension increase and some. Currently we are seeing service charge rises and being charged for things we previously were not charged for. Once again when I complain they say "Why are you worried it is Housing Benefit allowable?" They forget about those of us who have a meagre private pension. So please please why should Housing associations ever have more than their increase in costs They are supposed to be a charity. What is the point of giving Housing Associations more rent when according to them this only increases the Housing Benefit Bill? Please please govern fairly and many tenants need social housing rents to be fair. If Housing Associations were using surpluses to build houses for social rent I would not mind but they say they need 'grant' to do this and can only build Shared Ownership and 'Affordable'. Tenants have not had an opportunity to make representation about rises above inflation. Such rises in Social Housing rents are hurting the on the edge pensioner (not elible to housing benefit) and the hard working low pay. If benefits are capped it also adds a further burden robbing the poor to increase further surpluses of landlords. It is not fair that you do not directly ask tenants for their views								
107	Organisational response								No	The proposal to introduce above inflation rent increases of CPI+1% for five years, from 2020, is said to be a means of – • establishing "a stable financial environment to support the delivery of new homes", and • "ensuring that providers have sufficient income to manage and maintain their properties." This is somewhat disingenuous given that the coalition & Conservative government have previously introduced policies which have destabilised the finances of council & housing associations. When the new council housing financing system was introduced in 2012, we were told that it would provide enough resources to maintain homes over the long term. However, no sooner had the system started, than the government undermined the financial plans of councils by increasing the discount for Right to Buy (RTB). The 'enhanced RTB' increased sales fourfold, so that councils are losing far more rent income than was included in their business plans. Next, after abandoning their original proposal to introduce rent increases based on CPI+1% they introduced the four year rent cut. As the current consultation document admits, rents are 12% lower than they would have been if the rent cut had not been introduced. The scale of the loss of income over the 30 years, resulting from these policies, is huge. Individual councils will take in hundreds of millions of pounds of rent less than they planned for in 2012. Whilst the four year rent cut obviously benefited tenants, the loss of income to Housing Revenue Accounts has led to a scaling back of work on their homes. Although existing tenants will have had a 1% rent cut for 4 years, the flexibility that councils have to raise rents by 5% above the rent formula (or 10% for supported housing), means that new tenants are paying higher rents. Despite the four year rent cut there has been a massive increase in rents as a result of the 'rent equalisation' policy implemented by New Labour & subsequent governments. From 2010 to 2017 council rents in England increased by 32%, way above the level of inflation and wage increases. The best way to ensure that councils "have sufficient income to manage and maintain their properties" is to reopen the 2012 debt settlement and readjust the 'debt' that councils were given, in line with the amount of income they are losing over the life of their 30 year business plans, owing to government policies. Above inflation increases will be counter-productive. They will increase financial pressure on low paid tenants, many of whom are in precarious work, and will drive up the Housing Benefit bill (HB). Indeed, the consultation documents highlights that increases of no higher than inflation would save £2.4 billion on HB payment from 2020-25. We - Sheffield Defend Council Housing - oppose CPI+1% increases & call on the government to limit rent increases to no more than the rate of inflation. "Affordable rent" should be abandoned in favour of 'social rent'. Its introduction was counter-productive both from the point of view of increasing financial pressure on tenants whose rent is not covered by HB, while at the same time driving up the national HB bill. If the government wants to "limit the welfare costs associated with social rent" then it should reinstate universal social rent since "affordable rent" produces higher HB payments. Even with an end to the borrowing cap the Ministry of Housing estimates that this will only produce an extra 10,000 council homes a year. 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 built, more than 40% of them were council housing. "We have to get back to this" he said. Building on such a scale cannot happen without the reintroduction of central government grant. What is certain is that above inflation rent increases will not provide the resources to build on any scale. The saving on the HB bill with inflation level rent increases could be directed towards grant for councils to build new homes.								
108	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	We would support the rent standard being applied to us as a Local Authority registered provider	Not sure - Don't know	: Our argument would be we don't have to be the same as a registered private landlord as the Housing Benefit caps will be different for each of us.	Yes	This matches assumptions made in our business plan, any reduction in this would have a negative impact on our business plan	Yes	For information we (Bristol City Council) currently have approximately 10,000 homes still under target rent. Our intention is to move these to target at relet, there is nothing in the paper that suggests this would not be appropriate.		No comment as we currently have no affordable rented properties.	Yes		Yes	We welcome the commitment to provide certainty regarding rent levels. The impact of the rent cap/reduction will have long-term repercussions on our Business Plan, however, this proposal along with proposals in the Right to Buy consultation and the decision to lift the HRA cap will have a positive impact on our ability to deliver more new properties and safeguard investment in existing homes. We would ask for greater freedom to determine our own rents. This would allow certainty in the long term HRA planning, allowing us to deliver more homes (even if we only opted for CPI or CPI +1%). This represents a similar reflection of increased government flexibility demonstrated by the removal of the Housing Revenue Account borrowing cap. A review of Local Housing Allowance rent caps would be welcome, as they are also acting as a barrier to affordability private sector homes.

109 Organisational response				Yes		Not sure - Don't know		Yes	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 Homes England, whereby providers are making commitments over a period up to 2028/9, often predicated on the delivery of substantial numbers of affordable homes for rent at both social and affordable rents. The successful construction of these urgently needed additional new homes will be dependent on the rental streams which can be generated, and a prolonged period of assurance around maximum rent increases 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 proposed wording, in that prior to the four year rent reduction period, social landlords had the absolute discretion to add the permiited uplifts to formula rents, to reflect local conditions. The regulator's 2015 Rent Standard Guidance said: "Once formula rents have been calculated, registered providers have flexibility to set rents at up to +5% of the formula rent. For supported housing, the flexibility is +10% of the formula rent. This is intended to allow registered providers discretion in dealing with local factors". The proposed wording in the new draft policy introduces an important qualification to this as follows (para 2.14): "….. the policy contains flexibility for registered providers to set rents at up to 5% above formula rent (10% for supported housing……). We expect providers to use this flexibility in a balanced way, and not set all rents at 5% (or 10%) above formula rent." We believe that this new wording will introduce a significant level of uncertainty. What does 'balanced' mean, and who defines it? Could the interpretation change over time? How will the regulator enforce this aspect of the new standard? As a whole, we understand that the sector has been responsible in applying rent flexibility. However we are aware that practice varies between providers, who have used this discretion in very different ways. For example in the case of Riverside, a developing association operating primarily in lower value areas where average rents are significantly below national levels, the use of permitted flexibility has been maximised, particularly on relet. This also partly offsets the impact of a significant number of historically low rents, which remain below formula rent levels even without the tolerances applied. Whilst we believe that this is a completely justified approach given pressures to increase supply, is it balanced? At worst we are concerned that a more rigid interpretation of the term, could lead to a significant proportion of rents being found retrospectively to be non-compliant with the new rent standard, with Riverside (and similar providers) being faced with the obligation of managing them down over time, at least in real terms. This could have a significant impact on our business plan, and in turn, our ability to support the development of new homes for rent. We therefore propose that the second sentence of 2.14 is removed from the proposed policy statement, restoring absolute discretion to providers. Alternatively the sentence could be reworded to clarify that the expectation of 'balance' applies to the sector as a whole, rather than individual providers. We have discussed this issue with a number of our lenders. They share our concern about the introduction of ambiguity into the new policy, particularly given that in the introduction to the consultation paper the Government recognises "the need for a stable financial environment to support the delivery of new homes". They support our proposed change of wording.	Yes	We do agree with the proposed direction, however we believe that further work is required to clarify the wording on the increase as it applies in the first year (2020/21). The proposed definition of the '2020 limit' will be particularly problematic for a small number of tenancies let at both formula and affordable rents, where there has been a change of rent type in the final year of rent reduction. The proposed '2020 limit' definition establishes the baseline to which a CPI + 1% limit will be applied for each property, which is the average weekly rent charged in the fourth relevant year (ie 2019/20). In some 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 because the rent type has changed, either from a fair rent to a social (formula) rent, or social rent to affordable, with the average rent being based on a blend of rent under the two regimes. This is probably best illustrated by way of an example. •If a fair rent tenancy with a rent of £60 per week is relet at the start of January 2020 (week 40) •At a formula rent of £100 per week (for the remaining 12 weeks) •The average weekly rent for the year for that particular property will be around £69. •Under the wording of proposed direction, this will mean that the new tenant's weekly rent from April 2020 will be required to be reduced to a maximum of c£71 per week (applying CPI + 1% to £69, assuming CPI = 2%). •As opposed to increasing it to a maximum of c£103 per week (£100 raised by CPI + 1%). We do not believe that this is the Government's policy intention, and understand the desire to prevent landlords from 'gaming' the system in the final year of rent reductions. However we believe an alternative approach would address this issue whereby the maximum permitted increase would still be based on the '2020 limit' definition, except in the case of a property which has been relet during 2019/20 and where this has resulted in a different rent type being applied. In this case, the weekly rent for the remainder of 2019/20 would be taken as the baseline for the increase.	Yes	Subject to the same comments set out in our answer to question 4. We also propose that in 7 (6) of the direction, the definition of gross rent should be amended to clarify that the term 'service charges' does not include 'personal charges' such as those recovered for the heating and lighting of an individual tenant's home (as opposed to shared common areas) or for other elements such as meals. This would provide absolute clarity about the exclusion of these charges from the gross rent, which are often recovered by landlords in sheltered and supported housing, but which are not eligible to be covered by housing benefit or Universal Credit.	Yes		Yes	Our final comment relates the definition of 'specialised supported housing' set out in para 5.5 of the draft policy statement. One of the criteria used to define this term (e) states that for a scheme to qualify (and therefore be exempt from the social rent setting regime) "there was no public assistance……" relied on in its development. This differs slightly from the definition set out in the April 2015 Rent Standard Guidance which stated: "no, or negligible, public subsidy has been received, whether in the form of grant or free land". This is a small, but significant change, particular in the case of providers who have developed schemes where very small amounts of public assistance (<5% of capital costs) have been provided by local authorities or health authorities, often in the form of a 'dowry' attached to the individual tenant. Under the original regime, it was for providers to interpret what 'negligible' meant. However under this proposed revised definition, there is no room for interpretation, and providers could be faced with significant number of properties with non-compliant rents. Going forward, we have no difficulty with the revised definition of specialised supported housing set out in the draft policy statement. However we propose that the statement is amended to clarify that the change in definition will not be applied retrospectively, but that rather the definition in place at the time the scheme was developed should apply.
110 Organisational response				Yes	Stonewater agrees that a rent standard should apply to both local authorities and registered providers. Both provide affordable housing to those most in need and should therefore be similar in service and in governance, so customers should be entitled to the same clarity on future rent charges. The average Stonewater rent is £111 per week with the average local authority rent in Stonewater's geography at £98 per week. This differential has been created from previous rent setting mechanisms, including affordable rent, being applied. If the same rent standard and uprating is applied, local authority rents will always be lower than Registered Providers which in itself is not an issue as it provides a broader scope of product and service offer at different price points – providing they remain affordable.	Yes	Subject to the above yes	Yes	Stonewater agrees with the proposal to increase rents by CPI+1% each year. Having knowledge of the rent policy for the next 5 years allows some stability and enables Registered Providers to look forward and plan accordingly. There is however a balance of ensuring additional supply is supported through revenue income and affordability. As a country if we are to ensure that work pays we must also evaluate rents so they are truly affordable to a working household. Given this overarching driver there is also potential for the Government to encourage Registered Providers to develop and work towards reducing the housing crisis. The level of increase above CPI could be linked to development activity. For example, a Housing Association developing more than 2.5% of their total stock could be allowed to increase rents by up to CPI+2%. This would enable greater development funded through the additional rents and also encourage those that don't develop to do so. Stonewater would also welcome longer-term certainty over rent levels – for example the CPI+1% increase could be extended for a further five years to give Registered Providers the ability to plan further into the future, ultimately delivering more homes.		Stonewater has worked hard over the previous years to bring all rented properties in line with the required rent setting arrangements. By 2020 all Stonewater tenancies should be within the agreed levels and therefore 'capping' would not affect us.	Yes	Stonewater agrees with the proposed direction as it relates to affordable rented properties. Ultimately it is good for customers and the business to create sustainable communities and deliver quality homes that residents want to remain in. We do not currently offer fixed term tenancies and generally only let to new tenants, therefore the change to capping re-lets to existing tenants is not likely to affect Stonewater.	No	Stonewater does not currently collect information post-tenancy creation on a resident's income. The cost of managing the collection of information and the resulting changes to rents would exceed any benefit to the Registered Provider in terms of additional rent collected.	Yes	Stonewater supports the proposal to increase rents by CPI+1% and the clarity of an agreement until 2025-26 will provide some structure and stability for Registered Providers. However, the proposal raises the question of the effect on residents. For example, will benefits, particularly for those in work, increase by the same rate to ensure that tenancies are sustainable? The impact of Brexit must also not be ignored; potentially there could be an increase in unemployment, reduction in hours and salaries resulting in a greater dependency on benefits. This may push those people who are 'just about managing' (JAMs) into the welfare system. Stonewater also feels that the rent review proposal could go further to directly address and incentivise house building. Encouraging Registered Providers to increase their development of affordable properties would help tackle the recognised housing crisis. We discuss this further in our response to question 3.
111 Organisational response		Other (please explain)	Homes for the North	Yes		Not sure - Don't know		Yes	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 Homes England, whereby providers are making commitments over a period up to 2028/9, often predicated on the delivery of substantial numbers of affordable homes for rent at both social and affordable rents. The successful construction of these urgently needed additional new homes will be dependent on the rental streams which can be generated, and a prolonged period of assurance around maximum rent increases 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 proposed wording, in that prior to the four year rent reduction period, social landlords had the absolute discretion to add the permitted uplifts to formula rents, to reflect local conditions. The regulator's 2015 Rent Standard Guidance said: "Once formula rents have been calculated, registered providers have flexibility to set rents at up to +5% of the formula rent. For supported housing, the flexibility is +10% of the formula rent. This is intended to allow registered providers discretion in dealing with local factors". The proposed wording in the new draft policy statement introduces an important qualification to this, as follows (para 2.14): "….. the policy contains flexibility for registered providers to set rents at up to 5% above formula rent (10% for supported housing……). We expect providers to use this flexibility in a balanced way, and not set all rents at 5% (or 10%) above formula rent." We believe that this new wording will introduce a significant level of uncertainty which is at odds with the Government's intention of creating greater stability. What does 'balanced' mean, and who defines it? Could the interpretation change over time? How will the regulator enforce this aspect of the new standard? As a whole, we understand that the sector has been responsible in applying rent flexibility. However we are aware that practice varies between providers, who have used this discretion in very different ways. For example in the case of a number of our members, all of whom are developing associations operating in lower value areas where average rents are significantly below national levels, the use of permitted flexibility has been maximised, particularly on relet. This also partly offsets the impact of a significant number of historically low rents, which remain below formula rent levels even without the tolerances applied. Whilst we believe that this is a completely justified approach given pressures to increase supply, is it balanced? At worst we are concerned that a more rigid interpretation of the term, could lead to a significant proportion of rents being found retrospectively to be non-compliant with the new rent standard, with providers being faced with the obligation of managing them down over time, at least in real terms. This could have a significant impact on business plans, and in turn, the ability to support the development of new homes for rent. We therefore propose that the second sentence of 2.14 is removed from the proposed policy statement, restoring absolute discretion to providers. Alternatively the sentence could be reworded to clarify that the expectation of 'balance' applies to the sector as a whole, rather than individual providers.	Yes		Yes		Yes		No	
112								No	I object so strongly to the idea of social rents being increased above the rate of inflation. I can imagine that many councils will see this as a way of increasing revenue after so many years of cuts and the general undermining of the financing of council housing. In Leeds , I believe, the recent limitations on rent for the council and HAs meant that Leeds "lost" approximately £270,000 per annum. That is not a reason to increase rents now when there are many other ways to ensure a decent supply of council housing. The cap on borrowing to build was announced by Mrs May at the Tory conference. The MHCLG suggested that would allow 10,000 homes per annum to be built. That is a pitiful number when compared to what is required. The Right to Buy destabilises the Leeds council housing stock and should be scrapped. Those still struggling with the bedroom tax will find themselves in even greater difficulty as any increase in benefit payments is difficult to see especially as Universal Credit is rolled out. With a waiting list of over 26,000 families for council accommodation here in Leeds there is an urgent need for increased spending on a proper council house building programme rather than making tenants struggle financially.								
113 Organisational response				Yes	The new rent standard will ensure appropriate consistency and control of Local Authority rents. once HB Limit Rents are not applied under the Universal Credit regime.	Yes	Regulation of Local Authority Rents under the Social Housing Regulator should allow better cross-sector comparability for providers and tenants regarding value for money.	Yes	The CPI +1% increase is a reasonable measure remove new homes supply constraints, however we believe that a rent settlement of more than 5 years would be preferable to allow long term supply increases in view of development timescales.	Yes	We support the return to similar mechanisms employed in rent policy prior to the Welfare Reform reductions.	Yes	This is a sensible control measure to give AR tenants appropriate protection against mid-occupation rent hikes (i.e. provision of fixed term/ renewed tenancies should not mean tenants face excessive rent increases.)	Yes	This appears to be a sensible measure - we would assume that associated guidance would emphasise that whilst unique stock/ rent profiles may require exceptional exemption providers should not seek exemptions to make up for poor management/ stewardship.	Yes	Removal of the 2015-16 ten year rent settlement impacted negatively on our development and maintenance planning and it is essential that - if adopted - government stick to the current rent period settlement
114 Personal view	Yes							No	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 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 you propose will deliver 166% more new housing units. 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 with its obvious political advantages as it repurposes the current proposal and removes its perversities and targets taxpayer monies with much greater efficiency. Additionally, it produces lower rents that are 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 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 prevents the supply crisis we have experienced for decades by restoring a programme of capital subsidy that becomes systemic and allows all housing actors to plan with greater confidence. It develops and maximises new house building from 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. In short, this proposal gives a political solution to the UK Housing Crisis elements of undersupply and affordability and costs government not a penny more. I thank you for the opportunity and recommend you consider this alternate proposal carefully for all the above reasons. Yours,								
115 Organisational response		Other (please explain)	The Almshouse Association	Not sure - Don't know		Yes				Yes		Yes		Yes	There is an ongoing issue where some almshouse charities have charged a historically low level of Weekly Maintenance Contribution (WMC), well below formula rent. This was done with the best intentions of the trustees at the time. These charities are now unable to raise their levels of WMC above the CPI +1% cap as prescribed in the current rent regime. Consequently this has an impact on these almshouse charities being financially viable in the longer term and able to fund the repairs and support services that the residents need. The Almshouse Association welcomes the proposed arrangements to make exemptions to the rent standard on financial grounds. However we would ask that these arrangements are implemented immediately, to assist these charities, rather than waiting to 2020.	Yes	In 2.36 the Almshouse Association would ask that almshouse accommodation is added as a separate definition of support, as it is distinct from sheltered housing due to the unique support that almshouse charities provide to residents. This support includes provision of pleasing, often distinctive, well-kept homes with thoughtful layouts, social events, neighbourly assistance, landscaped gardens and management by local trustees, clerks and wardens. There is growing evidence that this support contributes to: a.Improved wellbeing b.Decreased loneliness c.Improved mental health
116 Organisational response					We do not agree to the rent standard being applied to local authorities. The self-financing settlement required councils to have regard to Government guidance on rents, but let them manage rent levels within the context of their HRA business plans and the borrowing cap. The introduction of a rent standard would therefore remove a significant element of flexibility. We have not achieved rent convergence primarily due to the changes in the rent policy over the last few years and to remove the flexibility to set our own rents would further reduce our ability to achieve rent convergence. We believe that the current rent guidance with the flexibility to set our own rents should continue.		Applying the same requirements to local authorities and private registered providers implies that a local authority and a private registered provider are the same both in terms of structure and finances. This is not the case. Therefore we do not agree that the same requirements should apply to both. An example of this is Right to Buy. Councils can only keep a portion of the receipts and what they return is covered by rigid restrictions. Councils should be allow to retain 100% of RTB receipts and allowed to use them flexibly to support local development and investment.		We welcome the proposal to increase rents by up to CPI+1% each year. However, we do not agree that this should only be for a period of at least five years. On the inception of the Self-financing regime the settlement included a valuation based on rent convergence, this was not achieved and has fallen further behind due to the four year rent reduction policy. This reduction in income across the life of the business plan will reduce the amount that can be invested back into the housing stock or into new build schemes.		We do not agree with the proposed direction as it relates to social rent properties. The direction does not make any major changes and therefore, we do not consider it necessary to make a direction where there are no major changes to the current process.		We do not agree to the proposed direction		We agree with the proposed arrangements for making exemptions from the rent standard on financial grounds as any proposal that would cause an authority serious financial difficulty would not be acceptable.		
117 Organisational response		A housing association/private registered provider (or a body representing the interests of housing associations/private registered providers)						Yes		Yes	We broadly welcome the Draft Direction, however we have concerns about the definition of the "2020 limit" which is defined in the Draft Definition (paragraph 2) as "the average weekly rent for the tenant's accommodation in the fourth relevant year within the meaning of section 23(6) of the Welfare Reform and Work Act 2016", increased by CPI + 1%. We are concerned that this fails to take account of the fact that the rent may have been re-let at a different rent level during that year; taking the average of the year could result in unexpected variations. We suggest a better solution would be to agree that the rent as at 31st March (the final day of the preceding financial year) may be increased by CPI + 1%, provided all other statutory requirements are met. A similar issue occurred with the Welfare Reform and Work Act 2016 where a Statutory Instrument was needed to confirm that the 1% rent reduction should apply to the final rent at the end of the financial year, to take account of re-lets and rent increases.	Yes	Please see our comment on Question 4 relating to the "2020 limit".	Yes		Yes	We welcome the decision to permit registered providers to increase rents by up to CPI + 1% each year as this will keep rents affordable for our tenants, while ensuring that our income keeps pace with our rising costs. However, we would also like to take this opportunity to request that government consider re-introducing a rent convergence mechanism, as existed between 2002-15. Many providers, including Peabody and Family Mosaic prior to our merger, have historically chosen to keep rent as low as is financially viable. A significant proportion of our social rents were substantially below formula rent, with the result that for some properties we were not able to reach formula rent within the allotted convergence timeframe. As a result, we still have many properties that are substantially below formula rent. Almost 30% are £10 per week below formula rent, of which half (almost 6,000 units) are over £20 per week below. Across our entire portfolio this is a huge opportunity cost which directly impacts our ability to service additional loans and build more urgently needed social rented units. We do not believe it is fair for these units to receive higher subsidy at the cost of other households who could be housed in newly developed units. Additionally, given our evidenced commitment to keeping rents low by phasing out higher Affordable Rents in favour of lower London Affordable Rents plus service charge, we believe it would be fair to gradually increase these the rents on properties below formula rent level to ensure equity between our tenants, who may pay drastically different rents simply due to historical policy changes. Re-introducing the convergence mechanism would also limit the incentive for housing associations to increase rents by the maximum CPI + 1%, as they could allow rents below formula rent to catch up instead. Historically Peabody and Family Mosaic demonstrated our restraint by increasing rents by lower than the maximum amount, for which we were then penalised by the annual 1% rent reduction policy between 2016-20. Committing to the CPI +1% yearly cap as well as introducing a convergence mechanism would allow housing associations to spread their rental income more equitably amongst tenants
118 Organisational response					To align with the roll out of Universal Credit, the Council agrees with the principle that the rent standard should apply to local authority registered providers from 2020 and awaits further confirmation from DWP on the mechanism for amendment to the Housing Benefit Subsidy Order in due course.		In the context of the roll out of Universal Credit noted in Question 1, and with the exceptions that the standard would not apply to: •Accommodation let to a high income social tenant household; and •Relevant Local Authority Accommodation' as set out in chapter 5 of the Draft Policy Statement The Council agrees that the same requirements should apply to local authorities and private registered providers.		The Council agrees with the proposal to permit registered providers to increase rents by up to CPI+1% each year. We would also seek clarity on the phrase "for a period of at least five years" as stated in the consultation. Our preference would be for a rent policy that matched the underlying principles of the self-financing settlement – that is, a 30-year business plan – to assist long term planning. This is particularly relevant now that the Limit on Indebtedness ('Debt Cap') has been abolished. Given that the Government's stated aim in lifting the borrowing cap was "to enable councils to build more homes" a key element of any business case in making investment in new housing is the certainty of future income streams. In the absence of a definitive commitment, it would be helpful to have a commitment that new homes built from 2020 onwards would have a guaranteed rental income of CPI + 1% for the period of the business plan; and an indicative timetable of when the policy will be reviewed and updated for other(older) properties beyond 2025.		The Council agree with the proposed direction as it relates to social rent properties.		The Council agrees with the proposed direction as it relates to affordable rent properties, including the proposal relating to the re-setting of affordable rent.		The Council agrees in principle with the proposed arrangements but awaits further disclosure from MHCLG on how Local Authorities can secure Secretary of State agreement that accommodation is defined as 'Relevant Local Authority Accommodation'.		Other areas of rent/tenure policy that would assist in overcoming barriers to enabling the government's new housing ambitions include: •As stated in response to Q3, a guarantee that new homes built from a combination of borrowing headroom and RTB receipts / other sources can be charged rent at CPI + 1% for the period of the HRA business plan (30 years) This would remove undue sensitivity from financial analysis and ensure otherwise viable schemes were not rejected. •Establishing links between rent policy/Universal Credit and flexible/fixed term tenancies. Given that social housing remains a public good funded via finite resource, the link between the lifetime tenancies/rent charged currently and changes to tenant circumstances requires regular review. Aligning Local Authority and Housing Association rents. The table below demonstrates the current misalignment between RBC and Housing Association properties. Although relets will, over time, serve to align rents as they become 'formula' no mention is given of opportunities for earlier convergence in the consultation paper. Property size Council Housing association Bedsit (studio) 66.52 One bed 76.01 77.57 Two bed 87.79 97.81 Three bed 99.58 107.91 Four bed 106.78 120.16 Five bed 130.30 147.06 •Flexibility around affordable rent. Local data suggests an affordability gap between social rents and private rent. Using information from the Annual Survey of Hours and Earnings (ASHE) carried out by the Office for National Statistics (ONS) and the Gov.uk definition of affordability that a household should spend no more than 25% of their gross income on rent reveals that in Rugby the approximate percentage of working households unable to afford private and 'affordable' rents is as follows: Property size Private rent (%) Affordable rent (%) One bedroom 50% 32% Two bedrooms 65% 41% Three bedrooms 74% 44% Four bedrooms More than 80% A further review around the criteria to let new properties at 'affordable rent' would be welcome in establishing how to address discrepancies between unaffordable private rent and scarcely resourced social rent by allowing Councils to engage in a more bespoke manner with what levels affordable rent is within a local economy. This might, for instance, take the form of creating bandings of affordable rent based on property valuations.
119 Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	We support the rent standard applying to local authority registered providers from 2020 for consistency. It would have been helpful to have more detail about the data requirements associated with this in order to comment further and assess any additional resources required/burden.	Yes	We support the same standards applying to local authority registered providers and private registered providers for consistency.	Not sure - Dont know	While the proposal to revert rent increases back to a maximum of CPI+1% is acceptable we would prefer the option of CPI+[illegible] in order to recover the previous position before the cut to social rents. The loss 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, which is usually done for a period of 30 years.	Yes	In view of the exemptions the proposal is acceptable.	Yes		Yes	It would be helpful to have more detail and certainty in relation to the process for securing the agreement of the Secretary of State.	Yes	We note that there are no changes to the mechanism for calculating formula rents. The policy is to increase the rent caps by CPI+1.5% in line with the previous arrangements for (formula) rent caps. However, the table in the policy statement includes the rent cap for 2019/20 frozen at 2015/16 levels. Conversions should be allowed in some circumstances with the agreement of Homes England or the GLA. In London some social rents and GLA London Affordable Rent levels are similar. Conversions may be necessary to cross subsidise housing regeneration or new development.
120 Organisational response					Chelmsford City Council is not a local authority registered provider but from a strategic perspective it seems fairer and more consistent for other parties if the same standard applied to all Registered Providers.		Yes, although there may be a need to give time for adjustment. We cannot comment on behalf of other local authorities who are Registered Providers other than to say that this seems an inevitable requirement in the medium to longer term if the same standard is to apply to both LA and private Registered Providers.		Yes, partly because of the impact that rent reductions have had on their capacity to develop new homes and other services. It would be helpful to also have pre-agreed periods for future reviews, so RPs are better able to manage their financial planning in the longer term		Yes, as this reflects the aim of achieving greater consistency, but we would want to see flexibility retained for rents and charges on local authority accommodation that is used to meet homelessness duties, e.g. homelessness hostels and other forms of temporary accommodation as this reduces the need for more costly options provided by the private sector such as nightly lets.		We would like to see, either through these proposals or clearer definitions and guidance within the National Planning Policy Framework and Guidance, provisions for local authorities to set caps at LHA levels, especially in areas where 80% of market level is still unaffordable to households on lower incomes or reliant welfare support.		Only in exceptional circumstances and not where this would affect the cost of homes that are being developed or have been agreed through planning as this could result in homes that were intended to be affordable and meet local need no longer being suitable for this purpose, increasing costs to the local housing authority and tax payer.		Whilst we understand the need for Registered Providers to be financially independent from subsidy as much as possible, we would not want this to result in homes that are designated as being unaffordable not being so, especially for households to whom councils have a duty to accommodate in areas of higher housing costs. We would also like to see analysis and solutions of the problems faced by larger families affected by the benefit cap who cannot afford larger, Affordable Rent homes.
121 Organisational response				No	The freedom for local authorities to set rents as they decide is set out in statute. The Housing Act 1985 permits them to "make such reasonable charges as they may determine" having regard to guidance from Government. These arrangements worked well for many years prior to imposition of the mandatory rent reductions which come to an end in 2020, and we see them as an implicit part of the self-financing settlement which, as a whole, was intended to give local authorities the capacity and freedom to plan long term for council housing in their areas. The limit rent system was sufficient to ensure that local decisions on rents did not compromise Government welfare spending policies. We recognise that, with the replacement of Housing Benefit with Universal Credit, the limit rent system will no longer work in its present form. However, we believe the Government has been too quick to rule out the option of a system that follows the principles of the limit rent system in favour of a move to rent regulation.	No	We see no adverse effects having arisen from the operation of different regulatory arrangements for local authorities and housing associations until now, and therefore see no reason why this should not continue.	Yes	Local authorities are planning housing investment over 30 years. The Government has so far only given a commitment that rents will be permitted to increase by up to CPI + 1% for 5 years from 2020 – a small fraction of the business plan period, which leaves a large area of uncertainty about the future. Managing the risk that Government will change its rent policy after 2025 means refraining from a proportion of the investment that would otherwise have been undertaken in the existing stock and in building new homes. The Government could do more to ensure delivery of its ambition of a new generation of council housing by extending the commitment to CPI + 1% to at least 10 years from 2020. While we accept that it is difficult to give a firm commitment beyond that, it would be helpful if the Government were to make clear whether, on the basis of current information, they see any reason why the policy should not operate throughout the business plan period of 30 years. While we welcome a commitment to CPI + 1% in broad terms, we would like to see more flexibility around this limit. Economic analysis commissioned from Capital Economics by ARCH, with the LGA and SHOUT, found that a CPI + 1% increase is broadly right, but higher increases in some areas would, by leading to more investment in new social rented homes, generate greater savings in welfare spending in the long term. In particular, we would like to see the reinstatement of the right of landlords to impose an additional increase to achieve convergence with formula rents, which was removed in 2015. We remain committed to the principle that local authority and housing association tenants should expect to pay the same rent for similar properties in similar areas, regardless of who their landlord is and when they took up the tenancy. There are many local authorities where the rents of long-standing tenants remain below formula. Reinstatement of the allowance for a small additional annual increase in rent could ensure full achievement of convergence no later than 2025. We estimated in 2013 that, over the business plan period, this would add £2 billion to local authority rent income, which could make a significant difference to the capacity of those authorities to deliver new homes.	No	See the answer to Question 1.	Yes		Yes		No	

122	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes	In applying the rent standard to local authorities it makes a more formal directive on how rents are set. [illegible]	Yes	No issues, rent policy was always intended to close the gap on LA'S and other registered providers. It will mean that private registered providers will have the certainty needed to leverage in private finance and build the homes required in the county.	Yes	Yes, this is the preferred option compared to a freeze or extension of the current rent reduction. It also means that the local authority can be confident in its ability to invest in their existing homes and services for tenants through the ongoing maintenance and repair programme.	Yes	Yes, no change to NCC'S current approach. NCC do not use rent flexibility levels.	Yes	Yes, no change to NCC's current approach. The proposal to ensure that when affordable rents are re-let they are calculated to no more than 80% of the relevant market rent and are subject to the CPI+1 will protect tenants from unreasonable and unaffordable rent increases.	Yes	Yes, LA'S will retain the ability to apply for the Secretary of State's agreement to get an exemption from the rent standard where there would be unavoidable and serious financial difficulty.	Yes	The policy removes any local flexibility in setting rents. The proposed direction states that CPI plus 1% policy should remain in place for a period of at least five years but this could be subject to change if the rent standard is amended. Provides some certainty for a 5 year period but still hinders forward planning beyond this.
123	Personal view								No	[illegible]		Convergence has had a negative impact on social rents in London (as detailed above). [illegible]						No. Funding for new social rented homes should instead be targeted to local authority and community-based organisations. We note that even with apparent statutory rental decreases under the Welfare Reform and Work Act 2016 (-1%) that housing associations surpluses are still at £3.5 billion as of December 2017.
124	Organisational response				Yes	In principle yes, it seems sensible to align Private Registered Providers and Local Authority Registered Providers however South Gloucestershire Council does not have its own stock so it is difficult to assess any direct implications	Yes	As Q1 it makes sense to align both Local Authorities and Private Registered Providers however South Gloucestershire Council does not have its own stock so difficult to assess any direct implications	Yes	Agree in principle with the proposal as it had been assumed that this was the default position which would be returned to after rent reduction expires. Some concerns that Social rent tenants who pay some or all of their rent will pay more than they would have done if social rent reduction had been extended beyond 2020 [illegible]	Yes	No issues with this other than as Q3 with regard to Social rent tenants who pay some or all of their rent.	Yes	Some concern that increasing affordable rent on re-letting could mean they become unaffordable to people reliant on benefits depending on the gap between LHA and actual market rents. For example on Rightmove, there are only two 2 bedroom properties in our Local Authority area advertised with a rent under £700pm (the LHA is £676.22). Of course this isn't a new concern. It was something that lots of people raised when Affordable Rent was introduced. Will the rules around providers not being permitted to increase by more than CPI +1% when resetting as a result of re-letting to an existing tenant, limit the ability of providers to 'convert socially rented homes to Affordable Rent	Yes	As a Local Authority we have no issue but some of our partner RP's have advised us that they understand the ability to exempt providers from one or more requirements in the rent standard would be a useful addition to the Regulator's powers, to protect the long term provision of social housing, however they feel this should only be used in exceptional circumstances, in order to prevent tenants covering the cost of poor financial management.	Yes	We feel the Government's proposal strikes the right balance between protecting current social housing tenants and allowing registered providers/ Local Authority Registered Providers' to invest in building more new homes and providing ongoing and improved maintenance and landlord services.
125	Organisational response				Yes	We are in support of the principle of a level playing field between local authorities and registered providers and therefore we support this proposal.	Yes	Yes, we support this proposal		We support the principle of protecting tenants from rent increase and strongly support measures to keep social rents genuinely affordable for tenants. However, the proposals do not take into account that [illegible]		We agree with the consistent approach recommended for all social housing, but welcome the exclusions set out in the draft policy, particularly care homes, specialist supported housing and temporary accommodation. Temporary accommodation is significantly more expensive and challenging to source than general needs housing. The capped rents would not reflect the true cost of re-servicing voids more frequently, furnishing and white goods and additional resources required to manage them. Due to these difficulties, all properties used for temporary accommodation, whether held in the general fund or the HRA, and irrespective of the terms of ownership or the historic source of financing, should be exempt. Not doing this will limit options for temporary accommodation and force local authorities to use costlier, lower quality private sector providers who have greater freedom to reflect the costs of providing temporary accommodation.		We support this approach.		We welcome the list of exemptions set out in the draft policy statement but as set out in our response to question 4, would like to see the exemptions extended to temporary accommodation held by local authorities.		No further comments
126	Organisational response				Yes	All housing providers should adhere to the same formula	Yes		Yes		Yes	: Agree to the proposed direction, providing that housing values remain either the same or CPI.	Yes	As long as the ceiling of CPI +1% is adhered to.	No	This makes a mockery of the proposed rent standard.	Yes	Comment: In theory, on paper, the proposals look good. However, in practice, the reality could be very different. Housing Associations are unfortunately, a necessity particularly in these times of Housing crisis, but generally, they do not offer value for money. Local authorities with retained stock need to have more autonomy over their own Housing Revenue Accounts. One option for Local authorities would be for them to offer mortgages to existing tenants who wish to purchase a private home, and where this is a financially viable option. Although there has been a 1% rent reduction, costs have increased in the form of service charges. This increases the total payable costs to the tenant and affects a property's affordability. If this situation continues of rising service charges added to a rent increase of CPI +1%, then tenants will find themselves considerably poorer. Unlike Housing Benefit, the Housing component of Universal Credit is paid to the claimant, whose responsibility is then to pass it on to the landlord. This doesn't happen in every case. Whilst this Panel are aware of the thinking behind this system, i.e. for a claimant to become more fiscally aware and responsible, this policy is actually driving housing providers into debt. In your impact statement, you convey, "The Government recognises the importance of rental income to both housing associations and local authority plans." Under this current arrangement for Universal Credit, there is a huge loss of rental income. Universal Credit needs to proceed along the same lines as Housing Benefit, whereby the housing element of any claim is paid directly to the landlord.
127	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		No	It is the Council's view that local authority rent setting should continue to be covered by guidance rather than be subject to regulation through the rent standard. [illegible] available resources. Arguably this would limit the Council's ability to invest in providing new housing and is therefore considered to be counter productive. Additionally it must be recognised that many Council existing rents may be significantly lower than formula rents than might be found in the housing association sector. So for instance a social rent for a 2 bed property in Wandsworth currently varies from £42.93 per week to £225 per week. The average formula rent for a 2 bed property in Wandsworth is £111.80 per week and the overall national formula rent cap on a 2 bed is £151.25. There must be flexibility in the system to allow for some alignment to formula rents which more properly reflects an average rent.	No	Flexibility is required to determine appropriate rents at a local level. [illegible] private registered providers. This would include the significant maintenance and improvement costs related to maintaining for instance system build housing found on a council's housing estates. The Government then must equally give consideration as to how social landlords can move existing social rents toward the formula rent. The Council would also advocate that some additional flexibility in respect to formula rents should be given where there is a need to fund necessary repairs and improvements to properties (e.g. to maintain safety standards) or where rental income will support development and regeneration plans.	Yes	The Council welcomes the end of the social rent reduction period and the intention to allow individual property rent increases of up to CPI + 1% from April 2020. [illegible] longer term commitment in excess of the five years from April 2020 would be welcomed that better aligned with HRA business plans. This would enable Councils to take an even longer term view on future investment and borrowing to support that investment. Currently it may not be prudent to place reliance on future rent increases beyond 2025 when making assumptions over long term financing strategies to support long term regeneration and development plans with no guarantees that future rent increases continue beyond that. This would leave Councils at risk of over committing themselves if say another rent reduction period was imposed in the future. More ambitious development and regeneration plans need as identified in this response a greater level of flexibility in being able to set rents and certainty over an ability to do this. Whilst it is recognised that such flexibility may not necessarily be reflected in national rent setting policy it could be established for instance in delivery agreements which give the necessary flexibility to set rents (e.g. on new build properties) to support development	No	The Council notes the direction in relation to social rent setting. As set out in the response to Question 1 this Council has a long standing policy of setting rents in relation to market rents rather than at formula rents. If regulation is introduced that directs local authorities to set rents in relation to formula rents then this will have a significant impact on the Council's rent setting policy and will result in a loss of income where properties with current actual rents above formula rents are reduced on relet. Equally it is noted that there is an opportunity to increase actual rent levels to formula rent where the property rent is currently below formula rent albeit the rate of increase may be very slow as this will be dependant on stock turnover. It is also noted that there is flexibility to set rents at up to 5% above the formula rent level for social housing which will be of benefit. The consultation states that this should be used in a balanced way and not all rents should be set at 5% above the formula rent. The Council would be interested to know what circumstances need to apply to enable the use of this 5% flexibility. Ideally these circumstances should be left to the Council to define in its local rent policy. The Council has concerns that the capping of rent increases to CPI, rather than CPI + 1%, for properties with rents set above the rent flexibility level will reduce the resources to the Housing Revenue Account. This will have a direct impact on the income levels in the Housing Revenue Account and require compensating expenditure reductions to mitigate its impact on the Housing Revenue Account business plan. If the rent standard is to be introduced, the Council's view is that the full rent increase of CPI + 1% should be allowed on all properties regardless of current rent levels to maintain income projections in the Housing Revenue Account with rents only reduced on relet as necessary. The Council's existing policy considered that having a wide range of rents, set in proportion to market rents, better reflected the range of stock the Council manages. The additional resources this has created has enabled the Council to invest significant sums into the condition of the existing stock therefore meeting the Decent Homes Standard without assistance of government funding and given the Council the opportunity to invest in large scale regeneration schemes. This has all been possible because the Council has had the freedom to set its own rent policy that works to deliver the resources required. Restricting future rent increases through regulation could stifle future ambition.	No	The Council notes the direction in relation to affordable rents and how rent setting for these properties differ from those let at social rents. Requiring a valuation for initial rent setting in accordance with a method recognised by the Royal Institution of Chartered Surveyors will ensure that registered providers adopt a consistent and transparent approach to the valuation of market rents but will add to the cost of letting and reletting properties at affordable rent which should be avoided if at all possible.	Not sure - Don't know	The Council welcomes that there are to be exemptions from the Rent Standard on financial grounds and for certain classifications of properties. However, the Council will be unable to make further comment on this until the process for authorities to secure agreement with the Secretary of State has been published in relation to Relevant Local Authority accommodation. Clearly this would only be applied for in the most exceptional circumstances. It should also be noted that there continues to be an unequal playing field between Councils and the housing association sector. Housing Associations do have ready mechanisms to manage their business and investment needs through the way that they can let much of their housing. This includes being able to let their social rent stock as private rent housing (on private rent terms) and to let on intermediate rent terms as well. This flexibility is not open to Councils in the same way where there may be financial pressures which need to be dealt with. Such flexibility would be welcome.	No	
128	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)		Yes		Yes		Yes		Yes		Yes		Yes		No	
129	Organisational response				Yes	Since 2016 the Welfare Reform and Work Act has required local authority registered providers to comply with the same rent reduction policy as private registered providers. Extending rent regulation to local authority registered providers continues this alignment, and Stoke-on-Trent is supportive of this approach, providing certainty over future rent policy underpins our confidence to build. In reality, there will continue to be disparities across the housing sector due to lower rents in general reflecting factors such as the relative size and efficiency of local authority landlords and their management. We would seek further clarity on how regulation of the CPI+1% increase will be applied to council properties, and how the Regulator would deal with a breach – whether this is by looking at average rent, or reviewing information at property level, which would be time-consuming for the Regulator. Whilst agreeing to the Standard, regulation of council rents would take away another aspect of self-financing (agreed on the basis of a 40 year rent policy, and where councils now only have certainty to 2025 under this consultation); we would question, therefore, whether this level playing field on the setting of rents, sets the scene for the same treatment to be applied as it relates to debt, and access to Right to Buy, adopting a similar approach that housing associations have in the Right to Acquire through local setting of discounts and local retention of capital receipts. Without this, an imbalance is created, where in theory local authority registered providers may be forced to set higher rents to absorb Right to Buy losses.	Yes	Whilst the same requirements should apply, this should be on the basis of a level playing field as it relates to receipts through Right to Buy, where local authorities are under greater pressure as a result of the lack of compensation for Right to Buy losses. Our consultation response on the Use of Receipts from Right to Buy Sales refers to this issue.	Yes	CPI+1% returns to the previous formula in effect prior to social rent reduction; as such it will have no Housing Benefit/Universal Credit impact as forecasting by the Office for Budget Responsibility has factored in this return. CPI+1% strikes the right balance between increased delivery of new homes and affordability for tenants. However, a much longer period of certainty is required (as a minimum 10 years, but ideally 30 years to mirror HRA Business Plans) about this as the guideline for future rent increases, to increase investor confidence in the long term viability of social housing, whether delivered by council or private registered providers. That said, the Prudential Code is sufficient in itself to control capital expenditure and ensure that loans borrowed are able to be repaid by the newly created income stream, and is what the council currently complies with through its General Fund and Audit Committee controls.	Yes	We agree that a new form of rent restraint/maximum rent increase is required following the introduction of Universal Credit, so that housing costs are not too high and therefore the general principles contained within the Policy Statement on Rents for Social Housing are generally acceptable, as they balance that restraint with an element of flexibility on re-let, which allows local authorities a long-term rebalancing of appropriate rent levels. However, we would propose that at least the final year of rent convergence is permitted in the transitional year 2020 to enable formula rents to be achieved for the majority of social properties, with a preference for this to be extended by two further years to allow full convergence for this authority. The impact of -1% rent reductions as a result of the Welfare Reform and Work Act has left most HRA Business Plans playing catch-up. Stoke-on-Trent currently has 78.4% of properties still below formula rent. This would be one year where a CPI+1% plus £2 per week is allowed one final time – solely for those properties whose rent is below the formula rent. This could be achieved by means of redefining the '2020 limit' definition in the proposed direction to allow up to £2 a week to be added to the current rent where the existing rent is below formula rent (with a cap of formula rent), with it being left to individual councils to determine whether to use such flexibility. Enabling this extension would evidence commitment to the Government's original intention to make rents fairer across the country. For Stoke-on-Trent this would enable 69.3% of properties to achieve formula rent in the transitional year, leaving only 9.1% of properties below formula rent.	Not sure - Don't know	In general the direction is acceptable, but the comparison of formula rent with 80% market rent needs to be on a comparable basis – either both excluding or both including service charges. As drafted, it may be interpreted that only where the formula rent alone (excluding service charges) is higher than 80% of market rent including service charges can formula rent be applied. In reality, a comparison should be between the formula rent plus service charges and the 80% of market rent and where the formula rent plus service charges is higher this level is permitted to be set. As stated in the draft Policy Statement at 3.2, the aim of these clauses was always to underpin investment in such areas, and the rules ideally need to be clarified so that they can be interpreted fairly.	Yes	There should always be a clause that enables exemptions in particular circumstances. We are in agreement with the exemptions set out as they relate to private registered providers (where complying with the requirement would jeopardise financial viability – similar to exemptions in place under social rent reduction), and for local authority registered providers (where categories of housing are exempt from the proposed rent standard – shared ownership low cost rental accommodation, intermediate rent accommodation, specialised supported housing, relevant local authority accommodation (with Secretary of State agreement), student accommodation, PFI social housing, temporary social housing, care homes).	Yes	The draft Policy Statement on Rents for Social Housing is clear and easy guidance to understand – we have no further comments to make in this respect. Rents are critical to long-term business planning. A longer-term framework of CPI+1% would add significant resource into Business Plans and the ability of both councils and private registered providers to borrow to invest in new homes, as well as providing greater certainty to tenants. From our original 2012 HRA Business Plan rents have reduced over the last few years by about 4% from what would have been expected (about 10.3% in real terms) and this has had a restraining effect on investment, where our income went down by £6.7m over 4 years. The proposals are generally welcome, but there are further improvements that can be made. The long term future of social housing is important for the country to sustain access to appropriate housing for as many people as possible. Without a sustainable long-term (ideally 30-year) framework, insufficient investment will continue, along with too many properties being sold at too great a discount and the overall homelessness position will continue to deteriorate at much greater expense to the public purse.
130	Personal view				Yes	Yes, because this would rationalise the regulatory regime in relation to the setting of social and affordable rents by local authority and private sector registered providers alike.	Yes	Yes, for the purpose of consistency, in extending to tenants of local authorities a similar degree of protection afforded currently to those of private registered providers.	No	No. In no other sector or situation subject to public policy is an above-inflation formula in operation (bar the fuel duty, which has been deferred consistently). The phrase 'by up to' will be rendered meaningless because most, if not all, local authorities will set rents at CPI + 1% due to funding pressures. The consultation document mentions that a balance needs to be set to address the interests of all stakeholders but, if this formula is adopted, it skews that balance unfavourably against tenants. Why should tenants be expected to fund the building of new social housing by enduring the burden of above-inflation increases to their rents? The lack of provision is not a problem of their making but the proposed formula would result in them paying for it. The provision of new social housing is the responsibility of local authorities and housing associations, properly funded by Government to achieve that objective. Neither salaries, pensions nor welfare benefits increase at the rate of CPI + 1%, indeed recent ONS data demonstrates that salaries are only just beginning to meet or exceed CPI. The unintended consequence of increasing social rents (which apply to those individuals whose incomes are the lowest) above CPI will be to increase the housing welfare burden on taxpayers (whether through Housing Benefit or Universal Credit). This surely cannot be the policy intention of these proposals? It does not make sense on any level for Government policy to contribute directly to making rents increasingly unaffordable and/or tenants increasingly reliant on benefits, which is what will result from the adoption of the formula proposed. The consultation does not take account of the measures announced in the autumn Budget of £2bn to support the supply of further social and affordable housing. Similarly, it does not take account of the removal recently of the limit of indebtedness on the Housing Revenue Account, which provides an alternative source of funding to local authorities. These developments should now be factored into the calculations provided in the consultation document because they will have a material impact on the results of that modelling and the 'preferred option' identified. Consequently, I do not believe that CPI + 1% remains the 'counterfactual' situation and should be revised downwards. From even a fundamental position of fairness, a zero increase would seem unreasonable to registered providers and, given that MHCLG's stated objective is a formula to strike a fair balance, a limit of CPI should instead be adopted.	Yes	Yes, apart from the matter of the rent increase formula proposed currently.	Yes		Yes	Yes, as it seems sensible but it should be triggered only exceptionally and data provided by a registered social provider to substantiate any claim of financial instability (whether local authority or private sector).	No	
131	Organisational response				No	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 account of tenants' requirements or the attributes they value. It is difficult to understand and is based on data that is approaching 20 years old. Making local authority providers comply with the Rent Standard will mean that authorities are unable to change their rent setting methodology to meet local needs, demand and tenant wishes. With the roll out of Universal Credit, it is hard to see how Government could seek to limit social and affordable rents in any other way.	Yes	If applying the Rent Standard to local authorities, yes. Nottingham, like many local authorities, has worked tirelessly to keep rents as low as possible for hard working local working families. This approach has also served to reduce public expenditure on Housing Benefit. As a result, Target Rent convergence in Nottingham was not achieved before the mandatory 1% rent cuts imposed by the Welfare Reform and Work Act 2016. Local authorities (and possibly some private registered providers) who have not reached target rents should be allowed to increase rents by more than CPI + 1% until target is reached. We seek flexibility to do this, taking account of local needs. This will create a more even playing field and will not penalise those authorities that have sought to keep rents and the Housing Benefit bill as low as possible.	Not sure - Dont know	It is disappointing for rent increases to be limited to CPI + 1% per annum after 4 years of 1% annual rent cuts; effectively a 12% to 15% cut in real terms. This reduction in income has hit our 30 year investment plan hard, making it extremely difficult to maintain decency levels in homes. It has had a detrimental effect on our new build ambitions with more money needing to be diverted to maintaining decency rather than new provision. This means fewer high quality, low-cost family homes for rent for local people and a reduced ability to contribute to the Government's ambitions to increase housing supply overall. As stated in our response to Question 2, if the CPI + 1% per annum cap is to be adopted, those authorities that have kept rents low and not reached target rent on some of their stock should be allowed to apply more flexible increases until target is reached. This will create a more even playing field and will not penalise those authorities that have sought to keep rents and the Housing Benefit bill as low as possible.	No	We would like Ministers to reconsider how social rents are calculated. We do not believe that the Formula Rent calculation works effectively or has any relevance to tenants. It does not contain enough flexibility to deliver rent differentials based on the attributes that tenants value. Rents that are based on market forces, in a similar way to Affordable Rents but lower, would make more sense. Therefore, homes with garages, gardens and other features in greater demand should command higher rents and those without, lower. Only 30% of the social rent calculation is based on property value, so the differences in valuation have a minor impact on the rent charged. The valuations and average earnings on which the calculation relies are now almost 20 years old. The world has changed significantly in this time and these should be revisited as a minimum. Given the Formula Rent calculation, it is impossible to deliver any new build homes for social rent. The 1999 valuation accounts for just 30% of the rent, which means it is not financially viable for new build and the costs therein. Making local authority providers comply with the Rent Standard will mean that authorities are unable to change their rent setting methodology to meet local needs, demands and tenant wishes. The Formula Rent regime is currently guidance for local authorities and we would like it to stay that way.	Yes	There are no proposed changes to the Affordable Rent regime. We have been setting Affordable rents on new build homes for some time as it is not financially viable to build quality new homes on a social rent return. We would not re-assess the Affordable Rent on re-letting the accommodation to an existing tenant via a tenancy change and support this approach.	Not sure - Don't know	Whilst these proposals do little to assist authorities to repair their Housing Revenue Accounts to deliver high levels of stock decency and new build provision, we can't see how any local authority would meet the government threshold of "unavoidable and serious financial difficulty" as a result of the application of the Rent Standard.	Yes	We would like to reiterate our view that the Convergence Formula Rent calculation is not fit for purpose now, or from 2020 on. It lacks flexibility to set rents based on attributes that tenants' value and the local housing market requires. It also fails to deliver sufficient rental receipts to support a new build programme by a significant margin. By making local authority providers comply with the Rent Standard, rather than work to the current rent setting guidance, local choice, flexibility and accountability will be lost. A requirement to a cap increases to CPI + 1% will not allow local authorities who are not yet at Target Rent to move towards it. We respectfully ask that where Target Rent has not been reached, authorities should be allowed flexibility to increase beyond CPI + 1% until the rent charged is at the target level. After four years of 1% rent cuts – effectively a 12% to 15% cut overall – a CPI + 1% cap will do little to aid our and government's new build ambitions, creating a step change increase in the provision of new low-cost, high quality homes for rent for local families.
132	Organisational response				Yes	This represents a consistent approach to apply the rent standard to all registered providers. It is also necessary for welfare reform changes as the current limit rent for local authorities is not compatible with Universal Credit.	Yes	This means that local authorities will be treated the same as housing associations and thus be subject to similar regulatory requirements rather than setting rents through legislation.	Yes	This increase above inflation is needed to restore HRA balances and build in sustainability after the four years of rent reductions. Although there is some concern that rent increases will exceed inflation thus leading to social rents rising higher than incomes. Firm commitments from the government for the medium to long term are fundamental to sustaining the development and restoring trust within the sector.	Yes	Yes generally in agreement with the direction, although it does not specifically deal with the issue of rent convergence which has still not been fully achieved.	Yes	It would be useful for the policy to consider more specifically the local differences reflected between social rent and affordable rent and how they should be treated.	Yes	This is needed to avoid financial difficulty for local authorities by exempting certain categories of low cost rental accommodation.	Yes	The additional income that this will generate from rent will enable all registered providers to enhance services to tenants, maintain existing stock, plan major repairs and investment and fund borrowing on new affordable homes. This is something that has been missing over the past few years for local authorities due to the debt from self-financing settlement and the imposed rent reductions. Although the removal of the borrowing cap is generally welcomed by the sector there is still some doubt whether local authorities will be able to build the amount of new homes that is required without any further funding.
133	Organisational response		A local authority registered provider (or a body representing the interests of local authority registered providers)			Yes, the overall impact of this will be minimal for Cheshire West and Chester		Yes, simplifying rent policy across both sectors seems sensible		In terms of financial planning, as a stock owning authority, this is a positive step in providing financial security for the operation of the Local Authority housing stock. From a Housing Benefit administration viewpoint there are a number of comments: •The increase effectively wipes out the rent reductions of the last 4 years, which reduced the cost of welfare, and minimised some of the impact of welfare changes. •Unless something changes with Universal Credit we are likely to have more rent in advance payments to social landlords and for longer periods to cover the waiting period. If rent levels increase as well then hardship, rent arrears and homelessness, and housing costs within welfare payments will increase. •Housing Benefit rent schedules are sent by each landlord annually and most are automated into our system, increasing or decreasing rent levels and housing costs. In Universal Credit each customer must update their online journal and if they fail to do this they will not be paid the extra in their housing costs, or if they do so late this would not be backdated. This alone will mean that many vulnerable customers will not report increased rent levels and will not have enough money to pay resulting in increased rent arrears and potential homelessness.		Yes, Cheshire West and Chester set target rents using the formula rent, the overall impact of this would be minimal.		For equity for tenants, the Council has assumed CPI +1% in our financial model.		Yes, whilst financial planning should prevent future issues, the Local Authority is subject to factors outside of its control, e.g. Right to Buys levels and interest rates, so the ability to temporary withdraw from the rent standard due to financial viability would be welcome.		
134	Personal view									Social Housing Rent rises CPR+% London Tenants Federation have submitted their members' views which are backed by myself as a member and [REDACTED] Panel Rep.								...when you read the submission from the London Tenants Federation consider that I agree with everything they have written.
135	Organisational response					It is accepted that an element of control is desired over the level of rents set in social housing, particularly as the Rent Rebate Subsidy Limitation Scheme will not operate alongside the implementation of Universal Credit, and as such the adoption of the rent standard for all registered providers may be the best route to achieve the consistency sought when rent restructuring was first introduced. The route through which many local authorities are able to charge affordable rents, i.e. by virtue of having entered into a right to buy retention agreement, must be considered in any application of the rent standard to local authorities, as must some of the differences that exist between private registered providers and local authorities, where there may be greater operational constraints placed on local authorities. In terms of transparency, accountability and fairness for tenants, having one rent standard under the Regulator would seem a sensible approach.		If the same requirements are to be placed on both local authorities and private registered providers, there must be consideration given to achieving 'a level playing field', recognising the requirement for local authorities to sell dwellings under the right to buy for example. As South Cambridgeshire District Council has not yet reached 'target rent' for all of its properties, this should be recognised within the Rent Standard to enable local authorities to continue to align rents to the 'target rent' upon voids, or to be allowed to return to the previous policy of phasing up to target rents for existing tenants in an attempt to achieve consistency more quickly.	Yes	The proposal to permit registered providers to increase rents by up to CPI plus 1% from April 2020 is supported, and following confirmation of the government's intention to do this, has been built into our financial assumptions, allowing the delivery of more much needed affordable homes in South Cambridgeshire. Any deviation from this clear intention would detriment our current investment plans.		We welcome the option for a local authority to be able to choose to charge lower than formula rent (with flexibility), allowing decisions to be taken that consider specific housing need, in the context of financial viability at a local level. We support the principle of an approach to bring into line those social tenancies where rents are currently higher than the flexibility levels, but as this does not impact South Cambridgeshire District Council, recognise that other respondents will have alternative views, when comparing the positive impact on their residents, with the potentially negative impact upon their business plans.		Although the affordable rent regime allows us to charge up to 80% of market rent, local policy is to cap our affordable rents at the Local Housing Allowance, as 80% of market rent is not deemed affordable in South Cambridgeshire. We welcome the suggestion that existing tenants should be protected from large rent increases after 2020, but would like to highlight the impact that protecting some residents causes when trying to explain rent levels to tenants in neighbouring properties, particularly as the social housing regime has been seeking to achieve 'consistency in rent levels' for many years.		We support the proposal that arrangements for making exemptions from the rent standard for local authorities should be introduced. We would seek clarity over the process for this, and guidance about the nature of exemption that may be considered by the Secretary of State.		
136	Organisational response								Yes	The National CLT Network welcomes the option to increase rent by CPI+1% for five years. We encourage that any policy should take into account that smaller providers such as Community Land Trusts find it very different to accommodate sudden changes to rent regimes.								