

English Devolution Bill

Lead department	Ministry of Housing, Communities and Local Government
Summary of proposal	The measures inside the scope of the Better Regulation Framework are: 1) Micromobility - creating powers for local authorities to license rental schemes for lightweight vehicles i.e. e-bikes, e-scooters 2) Community Right to Buy – strengthening the existing Community Right to Bid, for community groups to purchase Assets of Community Value 3) Sporting Assets of Community Value (SACV) - supporting communities to own sporting grounds 4) Banning upwards only rent review clauses in new commercial leases in England and Wales
Submission type	Impact Assessment – 15 May 2025 Urgent Measures
Legislation type	Primary legislation
Implementation date	Micromobility: 2027 Community right to buy: TBC Sporting Assets of Community Value: TBC Banning upwards only rent review clauses: TBC
RPC reference	RPC-MHCLG-25051-IA (1)
Date of issue	18 June 2025

RPC opinion

Rating ¹	RPC opinion
Fit for purpose	<p>The IA provides reasonable rationales for intervention, mostly explores non-regulatory options, and has suitable consideration of exemptions and mitigations for small business. The department should more systematically use Critical Success Factors.</p> <p>The IA evaluates the impact of preferred options acknowledging gaps in quantification. It assesses impacts on business, households, and wider government priorities. While there is discussion of potential data sources for monitoring and evaluation, a concrete plan should be included.</p>

¹ The RPC opinion rating is based only on the robustness of the rationale, options identification (including SaMBA) and justification for preferred way forward, as set out in the Better Regulation Framework guidance. RPC ratings are fit for purpose or not fit for purpose.

RPC summary

Category	Quality ²	RPC comments
Rationale	Green	The IA provides reasonable rationales for intervention, grounded in evidence of the problems with e-bike parking, high commercial rents regardless of market conditions, and insufficient community asset ownership policies. The department should be clear on the timeframe for several measures and consistently use SMART objectives.
Identification of options, including Small and Micro Business Assessment (SaMBA)	Green	The long-listing of options is comprehensive for some measures, but not SACV. Non-regulatory options are explored for some measures. Systematic approaches are used to shortlist most proposals, with reasonable justification for discarding options, but Critical Success Factors should be used systematically. The SaMBA shows suitable consideration of exemptions and mitigations for potential disproportionate impacts.
Justification for preferred way forward	Green	The IA evaluates the shortlisted options in terms of achieving objectives. Gaps in quantification are acknowledged, but qualitative analysis is provided to justify the preferred proposals.
Regulatory Scorecard	Satisfactory	The IA provides a reasonable assessment of business and household impacts. There should be more detail on wider government priorities such as foreign investment. Some impacts remain unquantified but are qualitatively analysed.
Monitoring and evaluation	Weak	While there is some discussion of data sources, a concrete plan with clear responsibilities, governance and timelines should be included.

Urgent measures

The department has used the Better Regulation Framework's urgent measures process for this provision. Where the Government decides legislation is required urgently and there is insufficient time ahead of seeking collective agreement for the necessary options assessment (OA), to be submitted to the RPC for scrutiny, departments are, instead, required to submit an impact assessment (IA) for scrutiny as early as possible after obtaining collective agreement. The IA should contain evidence, which should have been set out in the OA, on the rationale, identification of options and the justification for preferred way forward. The RPC then offers an opinion that includes an overall fitness-for-purpose (red/green) rating, informed by the individual red/green ratings for those three categories.

² Opinion template explanation: <https://www.gov.uk/government/publications/rpc-opinion-template-explanation>

Summary of proposal

The IA covers measures contained in the English Devolution Bill, aimed at deepening and widening devolution across England, reforming structures and accountability in local government, and empowering communities to have a more of say in the future of their local area and creating a pathway to bringing valued community assets into community ownership. Most measures are outside the scope of the Better Regulation Framework and do not require an RPC opinion. The 4 measures inside scope and that this opinion focuses on are:

1) Micromobility - introducing licencing by local authorities for micromobility schemes, like rental bikes and e-scooters. This aims to empower local leaders to better manage and integrate these schemes into transport networks, tackle issues like obstructive parking and anti-social behaviour, and promote wider uptake through ensuring proper coverage and accessibility. The licencing framework is intended to balance local flexibility with national consistency.

2) Community right to buy - strengthening the existing 'Community Right to Bid' by introducing a 'Right of First Refusal' for community groups, to purchase Assets of Community Value at a negotiated or market price, if the owner puts it up for sale. The aim is to increase community ownership of local assets by addressing criticisms of the current system - namely the 6-month window being insufficient to raise funds, no guarantee of purchase even if funds are raised, and a narrow definition of eligible assets.

3) Sporting Assets of Community Value (SACV) - A new category of Sporting Asset of Community Value would be created to make it easier for communities to take ownership of local sporting grounds, as well as facilities such as training centres and car parks integral to their operation. All sports grounds meeting the criteria would be automatically registered by local authorities as SACVs, granting communities stronger protections and right of first refusal privileges if the owners seek to sell.

4) Banning upwards only rent review (UORR) clauses in new commercial property leases in England and Wales. These clauses allow landlords to only increase rents at pre-agreed review points even if market rates have declined, which has led to concerns about market inefficiencies, inflated rents, and impacts on small businesses. Banning such clauses aims to make the leasing system fairer.

These four measures are scrutinised as they impact on the regulation of business and third sector activities, so fall under the remit of the RPC. The remaining proposals around areas like fiscal powers, elections, energy consenting etc. are out of scope, as they deal with adjusting competencies between levels of government. The IA includes a summary of their impacts.

Rationale

Problem under consideration

Micromobility: The IA provides extensive evidence from stakeholders, and TfL, to demonstrate problems such as obstructive on-pavement parking causing problems for pedestrians, particularly disabled people, as well as anti-social behaviour like pavement riding, and reckless use. The IA highlights that local authorities lack powers to address these negative impacts, while realising their benefits for integrated and green transport. 54 out of 62 authorities surveyed agreed licensing was essential. The IA provides data to support the scale of the problem: an estimated 50,000 dockless rental bikes in London, and reports issues in 26 other English towns and cities. The IA considers the problem through the lens of cycle schemes, to plan for all schemes likely to cause on-pavement congestion.

Community Right to Buy: The current 'Community Right to Bid' policy has been criticised as insufficient for allowing communities to take ownership of Assets of Community Value (ACVs) put up for sale. Issues include the 6-month window being too short for community groups to raise funds, no obligation for sellers to accept community bids even if funds are raised, and a narrow definition of eligible assets. The IA states that only 12-20 out of every 1,000 ACV applications result in community ownership. Evidence is drawn from evaluations of Right to Bid by community organisations and the CLG Select Committee. The IA should set out how community groups are defined and the purposes for which they can bid. There could be discussion of dealing with competition between local community organisations; in rural settings disparate geography make it difficult to create a geographic border and geographic divides in urban centres pose a potential challenge.

Sporting Assets of Community Value: The IA outlines the problem of sporting grounds being lost to their local communities, due to factors such as a lack of awareness, and community capacity to make use of existing protections like Asset of Community Value (ACV) listings. It cites evidence, including that only around 100 of the estimated 6,000 eligible sporting assets in England have gained ACV protection since its 2011 introduction. The IA should provide more evidence on impacts, such as surveying communities that have lost facilities, and why so few facilities have been registered as ACVs. More data pinpointing issues like awareness gaps or problems with existing legislation would clarify the nature of the problem.

Upwards Only Rent Reviews: The IA describes a prevalence of Upwards Only Rent Review (UORR) clauses in commercial leases, which ensure rent prices only increase or stay the same, even if market rates have fallen. This artificially inflates rents during economic downturns and is unfair to tenants, especially small businesses. The IA cites evidence that voluntary codes to address UORR clauses have been ineffective. There is limited data quantifying the stated negative impacts on aspects like rents, profits and high street vacancy rates.

Argument for intervention

Micromobility: The IA clearly identifies market failures including obstructive parking and anti-social behaviour, information differences between operators and local authorities, where operators hold data which local authorities could use to improve transport provision. The consequence of not intervening would be the harmful impacts continuing as micromobility schemes expand. The evidence provided supports the argument that existing voluntary arrangements are insufficient to address market failures such as bad parking. The IA notes that out of 155 European cities, 80% have a form of permitting system for shared e-scooter services.

Community Right to Buy: The rationale is to address a market failure where merit goods, community assets, with positive social impacts, are lost due to the ineffectiveness of the current Right to Bid policy. This initiative focuses on enabling communities to purchase existing assets, such as empty pubs and other high street spaces. By empowering local groups to take ownership, it aims to preserve and repurpose these spaces for community benefit, addressing challenges like short funding windows and restrictive eligibility criteria. The consequences of not intervening are that valued community assets will continue to be purchased by private buyers, who may not consider the community's interests.

Sporting Assets of Community Value: The IA argues there is a rationale for intervention to protect sporting grounds at risk of being sold off to developers, given their contributions to local wellbeing, community cohesion and sporting heritage. This rationale should be strengthened by providing more evidence on the specific benefits protecting sporting grounds would have for communities, and why current protections like ACV listings are inadequate to address the problem.

Upwards Only Rent Reviews: The IA makes a case that UORR clauses create market inefficiencies, with higher rents and vacant units, and disproportionately impact small businesses due to power imbalances during lease negotiations. The IA states that self-regulation attempts through voluntary codes have failed to curb UORR prevalence, suggesting a need for government intervention. The IA appears illogical, stating codes are ineffective because UORR are still routinely used, but then stating UORR are less prevalent than before, but there is a perception they are an issue. More evidence of the impact would help justify intervention.

Objectives and theory of change

Micromobility: The IA sets out reasonable SMART objectives including tackling obstructive parking, ensuring schemes operate safely, and improving public perception of schemes. The licencing approach is outlined as the way to achieve the objectives by giving local authorities formal powers to control scheme operations, require data sharing, set parking requirements and locally-specific conditions. The theory of change logically links the proposed licencing approach to achieving them by empowering local authorities.

Community Right to Buy: While overarching objectives are discussed, the IA does not provide a theory of change model showing the logical process by which the intervention will achieve the objectives. There are no timeframes attached to the objectives, and the department should clarify these.

Sporting Assets of Community Value: The IA sets out objectives but they are not SMART, particularly as they have no timeframes. The IA should develop clear SMART objectives and describe the logical process by which the objectives will be achieved, such as through a theory of change diagram.

Upwards Only Rent Reviews: The objective is that all new commercial leases in England and Wales should provide for rent reviews to be both upwards and downwards. The theory of change is that this will reduce business closures, vacant units, and support thriving high streets and economic growth. While the objective is simple, the IA would benefit from presenting it in a SMART format and developing a theory of change diagram. The objective should include timeframes.

Identification of options, including SaMBA

Identification of the long list of options

The IA describes long lists of options, spanning different types such as economic incentives, self-regulation, co-regulation, information provision, and regulation. All proposals should include do nothing as an option.

Micromobility

- Regulation of schemes through licensing (preferred)
- New duty on local authorities to reallocate road space for rental parking
- Encouraging collaboration between operators on industry standards
- A certification or accreditation body for industry standards
- An app to report bad parking of on-street micromobility vehicles
- Incentivising schemes through funding and funding conditions
- Raising awareness of existing offences around obstructing the highway
- Guidance to local areas on how to manage schemes

Community Right to Buy

- Do nothing
- Non-regulatory changes, through increased advice for communities
- Extending the moratorium period to 9 months, not introducing a Right of First Refusal or other changes
- Introduce a Right of First Refusal and a 12-month moratorium period with a break clause at 6 months (preferred)
- Introduce a Right of First Refusal with a 24-month moratorium period, along with changes to strengthen the ACV scheme.

Sporting Assets of Community Value

- Mandating security of tenure on all new sports ground leases
- Enhancing existing ACV protections instead of a new statutory regime
- New 'Sporting Asset of Community Value' statutory regime (preferred)

The department only looks at 3 options in the Sporting Assets of Community Value longlist, all regulatory. The department should re-examine options, particularly the potential for non-regulatory options.

Upwards Only Rent Reviews

- Do nothing
- Communication campaign of current industry Code of Practice
- Simple UORR ban
- Comprehensive UORR ban
- Comprehensive UORR ban, plus additional measures to rebalance power between tenants and landlords

Consideration of alternative options to regulation

Micromobility: The longlist includes non-regulatory alternatives such as encouraging industry collaboration on standards, an accreditation body, and information campaigns. The IA outlines in detail the rationale for ruling them out, such as narrow impact, lack of enforceability, and voluntary compliance not working.

Community Right to Buy: The IA states that increased advice for communities would not address issues such as an insufficient moratorium period, based on stakeholder feedback, so it was reasonably discarded from the short-list.

Sporting Assets of Community Value: The IA does not analyse non-regulatory options like information campaigns or voluntary codes of conduct. It focuses on comparing forms of regulation; it should reconsider non-regulatory approaches.

Upwards Only Rent Reviews: The IA mentions non-regulatory options promoting existing self-regulation codes, but reasonably states these were ruled out based on evidence of their ineffectiveness and stakeholder feedback.

Justification of short list of options

Many longlist options were ruled out, with various rationales:

Micromobility

- Duty on local authorities to provide parking space (only solves one issue)
- App to report bad parking (narrow impact, reliant on voluntary compliance)
- Incentivising schemes through funding (lack of funding)
- Raising awareness of obstructive parking offences (narrow impact)
- Creating civil enforcement powers (narrow focus, likely increased user costs)

The IA outlines in detail the criteria used to assess options, such as scoring against objectives and Green Book Critical Success Factors, e.g. strategic fit, achievability.

Community Right to Buy:

- 9-month moratorium (still inadequate time according to stakeholder feedback)
- 24-month moratorium (too great an impact on asset owners)

The short-list only includes the preferred option of a 12-month moratorium period. The process should be justified more clearly using Critical Success Factors.

Sporting Assets of Community Value

The department does not narrow the options from a long list to a short list. It discards two of the shortlist options explaining its rationale, but should systematically use Critical Success Factors.

Upwards Only Rent Reviews

- Communication campaigns (past campaigns were ineffective)
- Simple ban without anti-avoidance measures (would have little impact)

The shortlisting process would benefit from using Critical Success Factors to demonstrate a more systematic approach.

Small and Micro Business Assessment

Micromobility: The IA discusses how the flexibility of the preferred licencing option would allow consideration of proportionality of requirements and potential exemptions for small and micro businesses, to ensure viability and a sufficiently competitive market. It considers risks like disproportionate cost burdens as well as potential mitigations, such as exemptions. The IA could be expanded to assess whether smaller operators may face barriers to obtaining licences, or complying with conditions, compared to larger firms.

Community Right to Buy: The IA provides a sufficient SaMBA, stating that while the policy creates restrictions that may negatively impact asset owners, it is likely to have a positive impact on surrounding small businesses by increasing footfall and vibrancy in town centres. The IA clarifies that some current exemptions, e.g. for businesses sold with the asset, are expected to continue, mitigating impacts on small businesses. The IA notes that there will continue to be an appeals process, whereby small business can challenge the listing of ACV, but the cost and time resource for small businesses should be considered.

Sporting Assets of Community Value: The IA considers impacts on small and micro businesses that own sporting facilities. It provides estimates of the business population, in the sports activities industries, using data from the department for Business and Trade. Based on turnover percentages, it estimates about a third of businesses affected will be small and micro businesses. The IA acknowledges smaller businesses may face disproportionate impacts due to relatively limited access to credit. It does not quantify this, however, the IA reasonably argues that the monetised costs, which rely on proxies like average asset values, should be proportional to business size and not put undue burden on smaller firms.

Upwards Only Rent Reviews: The IA considers impacts on small and micro businesses, stating that the preferred option is expected to have the largest positive impact on SMBs who are more likely to face UORR clauses due to lack of knowledge, or power imbalances during negotiations. It also acknowledges that small landlords will face costs in terms of reduced rental income, proportionate to their portfolio size.

Justification for preferred way forward

Identifying impacts and scale

Micromobility: The IA provides a qualitative assessment of key impacts of the shortlisted options. It identifies the potential impacts on businesses, local authorities, and the public/users of the schemes. It provides limited quantification of impacts for the preferred option, as the department states that scale of impacts will depend on decisions taken in secondary legislation. Rough quantification in the IA of some impacts, like additional parking bays, gives a sense of scale.

Community Right to Buy: The IA quantifies, in detail, key impacts such as the opportunity cost to businesses from delays in sales, under the preferred option's extended 12-month moratorium period. The IA reasonably estimates a Net Present Social Value (NPSV) of around -£5m and an Equivalent Annual Net Direct Cost to Business (EANDCB) of around £0.9m. However, the department expects the overall impact to be positive, due to non-quantified benefits such as increased community cohesion and protections from asset stripping. The IA provides a reasonable assessment of the impacts to support the justification of the preferred option. There should be more on the cost of building capacity of community groups to manage and develop the assets.

Sporting Assets of Community Value: The IA uses an identical methodology to the Right to Buy measure to quantify key impacts such as the opportunity cost to businesses from delays in sales, under the preferred option's extended 12-month moratorium period. The IA reasonably estimates a NPSV of about -£1m and an EANDCB of about £1.4m. However, the department expects the overall impact to be positive, due to non-quantified benefits such as increased community wellbeing and protections from asset stripping. The IA provides a reasonable assessment of impacts to support the justification of the preferred option. There should be more on the cost of building capacity of community groups to manage and develop the assets.

Upwards Only Rent Reviews: The IA quantifies some key impacts of a comprehensive UORR ban estimating a NPSV of -£1.6m and EANDCB of £0.2m from familiarisation costs. The IA does not quantify the wider, indirect impacts it mentions like potential benefits to high streets and business insolvency rates, which if significant could affect the overall cost-benefit assessment.

Evidence and data

Micromobility: The IA makes use of data from operator and local authority surveys, which provides a reasonable evidence base given this is a primary legislation framework. The IA transparently acknowledges uncertainty around some assumptions, like the proportion of new spaces that will be utilised.

Community Right to Buy and Sporting Assets of Community Value: The IA makes use of available survey data and evidence from similar past programmes, and

current programmes such as that in Scotland, to estimate impacts like the anticipated increase in community ownership. There is insufficient evidence of impacts on sporting assets specifically. The IA should look at those that were listed, or those that were refused listing status and the outcomes of court challenges.

Upwards Only Rent Reviews: The IA uses several data sources to estimate impacts such as effects on rental income and costs. The IA notes the evidence indicates it is largely a historical problem and should clarify the current situation.

Uncertainty, risks and assumptions

Community Right to Buy: The IA discusses uncertainties like the lack of evidence on what counterfactual actions asset owners would take in the absence of the policy. It provides high and low scenarios to test assumptions around the level of price disparity between community purchases and open market sales.

Sporting Assets of Community Value: The IA acknowledges uncertainties around key assumptions like the expected increase in asset purchases and number of tribunal hearings to hear appeals from asset owners or community groups. It conducts sensitivity analysis on these variables.

Selection of the preferred option

Micromobility: The IA justifies licencing as its preferred option, stating it meets objectives while offering flexibility to mitigate impacts on smaller operators and manage schemes locally. Licencing replicates similar models used internationally and allows balancing of operator interests with local authority needs to maximise benefits and minimise negative impacts. The justification appears reasonable based on the qualitative assessment provided, though more quantification of impacts is expected at final IA.

Community Right to Buy: The IA reasonably explains why a 12-month moratorium with review at 6 months is preferred, citing stakeholder evidence that the current 6-months is too short for community groups to assemble financing.

Sporting Assets of Community Value: The IA argues SACV is preferred as it allows for tailored protections for sporting assets while minimising unintended impacts on other asset types. The justification should be strengthened by more detailed examination of a longer list of options, including non-regulatory options.

Upwards Only Rent Reviews: The IA justifies a ban, noting it is expected to best address the objective of creating a more flexible rental market. The appraisal of the shortlisted options could be strengthened by more clearly laying out the key trade-offs between them, for example, explaining why the ban with guidance is considered excessive, compared to the benefits it may provide.

Regulatory Scorecard

Overall welfare impacts

Micromobility: The only quantified impact is familiarisation costs to operators, of around £0.01m. The IA acknowledges there will be wider unquantified impacts.

Community Right to Buy: The IA quantifies some key impacts, estimating £21m benefits and £26m costs, resulting in a Net Present Social Value of -£5m. However, the IA provides a qualitative assessment stating it expects a net positive impact on welfare from the preferred option, due to unquantified benefits from community cohesion and protections against asset stripping.

Sporting Assets of Community Value: The IA quantifies some key impacts, estimating around £13.4m benefits and £14.7m costs, resulting in a Net Present Social Value of about -£1m. However, the IA provides a qualitative assessment stating it expects a net positive impact on welfare, due to unquantified benefits from community cohesion and protections against asset stripping.

Upwards Only Rent Reviews: The IA states that the quantified impact is an NPSV of -£1.6m. However, it notes there are likely positive unquantified impacts from a more competitive rental market resulting in thriving high streets. The IA could benefit from providing more detail on the scale of these expected unquantified benefits.

Business Impacts

Micromobility: The IA quantifies familiarisation costs of around £0.01m. It provides indication of the types of impacts that may arise after secondary legislation, including indicative costs of applying for licences, providing data, and parking infrastructure.

Community Right to Buy: The IA quantifies expected direct costs in terms of the opportunity cost to asset owners from delays in sales, and a potential disparity between the fair price determined and what could be obtained on the open market. The EANDCB is estimated at £0.9m over 10 years.

Sporting Assets of Community Value: The IA quantifies the direct costs to businesses from the preferred option, estimating an EANDCB of £1.4m. This includes the opportunity cost to asset owners from delays in sales.

Upwards Only Rent Reviews: The IA quantifies direct impacts to businesses, estimating an EANDCB of £0.2m from familiarisation costs and rent transfers of £61m. It acknowledges there are unquantified benefits from reduced insolvency risk and increased market flexibility, which could outweigh the costs.

Household Impacts

Micromobility: The IA notes that impacts, arising through benefits to users, will not be realised until secondary legislation to regulate specific vehicle types and operations.

Community Right to Buy: The IA quantifies two impacts: an increased employment benefit of £13m and a £7m benefit from more volunteering, as community assets are

more likely to use volunteers. It states the policy should bring benefits to community welfare and the vitality of high streets.

Sporting Assets of Community Value: The IA quantifies increased benefits from employment of £4m and volunteering of £8m, as community assets are more likely to use volunteers. It states the policy should bring benefits to community welfare.

Upwards Only Rent Reviews: The IA does not quantify household impacts but states there are likely positive wellbeing impacts from having less vacant high streets.

Distributional impacts

Micromobility: The IA notes that reducing street clutter will have significant benefits for disabled people after the secondary legislation stage.

Community Right to Buy: The IA identifies significant distributional impacts toward local communities, which will reduce inequalities particularly in disadvantaged areas.

Sporting Assets of Community Value: The IA identifies distributional impacts toward local communities, which will reduce inequalities particularly in disadvantaged areas.

Upwards Only Rent Reviews: The IA notes small businesses, especially in hospitality, will benefit most as they are more likely to have UORR clauses in existing leases.

Business environment

Micromobility: Potential negative impacts of regulation, like stifling innovation or competition in the micromobility market, should be explored.

Community Right to Buy and Sporting Assets of Community Value: The IA argues market impacts are likely minimal. The IA should make clear why SACV is expected to apply to assets at the lower end of market value, what that means and why it expects it will not affect foreign investment. The proposal should consider the additional costs of making it harder for businesses to sell as they choose according to market forces.

Upwards Only Rent Reviews: The IA assesses that banning UORRs supports ease of doing business in the UK, by enabling economic growth through a more competitive rental market. It notes the removal of guaranteed rent increases could potentially deter some investment.

International considerations

Micromobility: The IA suggests regulatory certainty could attract foreign investment from micromobility businesses previously reluctant to invest.

Natural capital and decarbonisation

Micromobility: The IA notes potential greenhouse gas emission savings, contingent on modal shift. It notes uncertainty about emissions from the lifecycle of micromobility vehicles.

Monitoring and evaluation

While there is discussion of data sources, a concrete plan should be included.

Micromobility: The IA notes a post implementation review (PIR) is not required, but discusses what types of data will be collected to monitor the impacts.

Community Right to Buy: The IA outlines a high-level plan focused on tracking data from local authorities on the number of assets listed as ACVs, the number purchased by community groups, and details on compensation claims and appeals. It commits to developing a more detailed strategy as the policy is finalised. It states that the Government will consider whether a PIR is needed.

Sporting Assets of Community Value: The PIR will build on the monitoring data gathered and align with evaluation for the Right to Buy policy. The availability of local authority registers of Assets of Community Value, the number and type of sporting assets listed and purchased by communities, will be monitored. The IA states that the Government will consider whether a PIR is needed. A light-touch evaluation may take place 2-3 years after introduction, to allow time for the policy to generate meaningful data, while timely enough to adjust if needed. A qualitative, case study evaluation approach focused on specific asset acquisitions may be best suited, but details of the PIR methodology will be developed closer to the review point.

Upwards Only Rent Reviews: The IA proposes monitoring through surveys to assess the prevalence of UORR clauses remaining and impacts on rental costs. The IA notes that scoping is required to identify data sources.

Regulatory Policy Committee

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