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## **CONSULTATION RESPONSE TO PROPOSED FAIR RENT LEGISLATION**

### **Questions About you**

1. I am responding as a member of an organisation.
2. A and B. I am a relevant professional, a member of the public and in a commercial organisation
3. I would like the response to be published anonymously
4. I confirm I have read and understood the privacy notice attached to this consultation which explains how my personal data will be used.

### **Views on the proposal**

#### **Aim and approach**

##### **1. Rent cap. I would be fully opposed.**

- Under The 2016 Act, the tenant can give 28 days notice, there is mainly not a scarcity of properties, the rent can only be increased once each 12 months and there is provision for independent referral.
- CPI plus 1% is a crude measure and in some locations will result in a figure higher than market rental
- Restriction of income may cause difficulty in having funds for repairs, maintenance and improvements
- Landlords may be reluctant to stay in the market, reducing supply, putting pressure on prices and limiting choice
- Landlords how have a good relationship with long term tenants and keep rent increases modest will be penalised as new market rents are tied to an uplift limit

##### **2. Rent level appeals. I would be fully opposed**

- Static /downward only reviews will result in a 2 tier market with winners and losers in an arbitrary fashion.

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**3. Landlord Registration Scheme. I would be fully opposed.**

- This would be time consuming and expensive
- There would be difficulty in the detail and scope of the information
- There is a lot of easily accessible evidence
- Councils could use the Assessors, Valuation Office Agency and Council Estates Department.

**4. Other options-Rent Pressure Zones. I would be fully opposed**

- Rent Pressure Zones should only be considered to be introduced if there is good evidence to justify them
- They will cause confusion and disruption for existing tenants and new lettings within the designated area and red lining around the designated area

**5. Financial Implications**

- (a) Government and the Public Sector
- (b) Businesses
- (c) Individuals-including tenants

- In each case there would be a significant increase in cost.

**6. Are there ways the Bill could achieve its aim more cost effectively**

- No, it is far better to be realistic and honest about costs in proposals than be misleading and lose credibility.

**7. Effect on Equalities**

- Landlords and agents only hold information on 4 of the 9 characteristics so it may not be possible to gauge impact
- Lenders restriction on benefit tenants has a negative effect
- Clawback of up to 6 years benefit from Landlords and Agents where there was not a genuine entitlement to the tenant unknown to the Landlord/Agent has a negative effect.

**8. Mitigating negative impact. No**

- Interference in economic matters very often results in unintended consequences as can be seen in the history of housing provision and government legislation

**9. Sustainability. No**

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**10. General. Other comments or suggestions.**

- The public sector needs to provide more social housing
- Responsible landlords are facing more time and expense while irresponsible ones are not penalised as authorities do not have time/resources. We had water ingress from an adjacent let flat which was un-registered, the owner having multiple properties, we informed the Council, 6 years later it was still not registered.
- Concern has been raised over the decline of the condition of tenements and this will only be exacerbated by the reduction in income leaving less funds for common repairs
- Politicians need to decide whether they do not wish a private rented sector or they allow it to exist under reasonable regulation as excessive control has negative effects and the sector will diminish
- Taxation and public provision is the way to provide public needs not requiring individuals to subsidise others in a random manner We had regulated tenants on a controlled rent who then bought another flat which they let on a market rent on a short assured tenancy
- Other housing policies should be considered, Glasgow City Council used to provide home loans at the lower end of the market
- Potential development sites should be released by planning schemes and developers given incentives if they help provide social housing
- In 1912, 90% of private sector renting was provided by commercial organisations now it is mainly private individuals with 1 or 2 units
- After rent control due to Landlords bad practice the sector withered as successive politicians did not do any reform
- Housing was poor quality and tenements declined due to there being no funds for investment
- Landlords and Agents will now be seen to have given misleading advice to all concerned as the goalposts are moved