

RENT SETTING POLICY REVIEW 2023/24 – CONSULTATION OUTCOMES

Do you support the introduction of the revised Rent Setting Policy?

| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|------------|----------------|------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 565 | 67.8 | 85 | 10.2 | 35 | 4.2 | 685 | 82.2 |
| No | 137 | 16.4 | 4 | 0.5 | 7 | 0.8 | 148 | 17.8 |
| Total | 702 | 84.3 | 89 | 10.7 | 42 | 5.0 | 833 | 100 |

Did you find the revised Rent Setting Policy easy to read and understand?

| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|------------|----------------|--------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 595 | 71.8 | 80 | 9.7 | 38 | 4.6 | 713 | 86.0 |
| No | 103 | 12.4 | 9 | 1.1 | 4 | 0.5 | 116 | 14.0 |
| Total | 698 | 84.2 | 89 | 10.7 | 42 | 5.1 | 829 | 100.0 |

Is there a section that you would like to see reworded?

| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|-------------|----------------|--------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 39 | 4.8 | 4 | 0.5 | 2 | 0.2 | 775 | 5.5 |
| No | 650 | 79.3 | 85 | 10.4 | 40 | 4.9 | 45 | 94.5 |
| Total | 689 | 84.0 | 89 | 10.9 | 42 | 5.1% | 820 | 100.0 |

What would you like to see reworded?

Appendix 1 does not mention bungalows in property types

Response to suggestion

Bungalows are included as a house.

APPENDIX I

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| <p>The calculations don't really mean anything. There no explanation as to what the numbers mean. Need to be a more detailed layout of regular, planned maintenance. Such as guttering, roofing etc</p> | <p>The rent setting calculations have been included in APPENDIX I of the policy without financial detail. This will mean that the financial figures can be updated, if necessary, without having to amend the policy. The financial detail will be included information resources which will be published and available to tenants, including in any correspondence regarding the calculation of the tenant rents. This will be monitored and updated regularly.</p> |
| <p>State what the service charge would be and what for?</p> | <p>APPENDIX I of the policy confirms that the service charge is for the communal area and heating and applies only to the sheltered housing facility at Larch Court.</p> |
| <p>I think another copy in an easy read format could be sent out also. There is a lot of information to take in and can be daunting for some. I for one would rather a basic read with important points listed and then a full copy for all the little not so important things</p> | <p>Noted. An easy read leaflet explaining the policy and including examples was included as part of the consultation resources. This will be updated and made available if the policy is agreed.</p> |
| <p>Section 8.3 needs to be more in depth, especially when it comes down to EPC. Living in a very old property that has no proper insulation and despite having a good heating system is freezing all the time</p> | <p>This level of detail would not be included in the policy. An explanation is however available in the easy to read supporting leaflet, which was issued as part of the consultation undertaken. The easy to read leaflet will be updated and published if the policy is agreed.</p> |
| <p>You need to be clear about planned improvements, i.e. give examples and of waiting time reduction for improvements</p> | <p>Section 9.1 refers to property improvements and does private examples. Further examples will can be included in the supporting information resources, if the policy is agreed.</p> |
| <p>Thought the 28 days warning before rent increase a bit draconian.</p> | <p>This is in accordance with Section 25 of the Housing (Scotland) Act 2001 which specifies that tenants must be given no less than 4 weeks' notice of the increase.</p> |
| <p>It just needs to be fair for single occupants.</p> | <p>The policy uses property size as a factor in determining the rent calculation. Tenants will have been allocated properties deemed suitable to the size of their household as determined by the Allocations Policy. Therefore it will be a fair process for all.</p> |

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| I think if you have private parking/ drive way you should pay more rather than parking on street/carpark. | The policy does use off street parking in calculations for charging rent. On street parking or car parks are not taken into account. |
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Is there something that we've missed from the revised Rent Setting Policy that you think should be included?

| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|------------|----------------|------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 46 | 5.6 | 9 | 1.1 | 5 | 0.6 | 60 | 7.4 |
| No | 640 | 78.4 | 79 | 9.7 | 37 | 4.5 | 756 | 92.6 |
| Total | 686 | 84.1 | 88 | 10.8 | 42 | 5.1 | 816 | 100 |

| What do you think should be included in the policy? | Response to suggestion |
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| Reduction when tenants upgrade their homes or keep rents the same. | It is unlikely that most upgrades by tenants would affect the attributes taken into account in calculating rents. There may be rare instances where the type of upgrade a tenant makes would change the attribute. E.g. heating improvements that would change the EPC. It would depend on the type of improvement and if the council have to take assume liability for the maintenance and upkeep of the upgrade. It may be that the rent does not change until the tenant vacates and the property is void. This would be discussed with the tenant when they apply for permission for the upgrade. Each case will be assessed based on its own merit. |
| The perceived value of a property also relates to the availability of local amenities (or lack thereof), therefore it would seem prudent to reduce the rental charge for properties in villages where there are little or no public amenities when compared to properties in areas where more is provided. | Noted however the availability of local amenities is not a relevant attribute of the Rent Setting structure. |

APPENDIX I

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| An easy read version for people with learning disabilities - e.g. as per accessible information legislation | An easy read leaflet explaining the policy and including examples was included as part of the consultation resources. This will be updated and made available if the policy is agreed. |
| The amount of years a person has been a tenant and the type of housing e.g. Stone and lime houses or prefabricated like the ones we are in. Our houses went up to empty the long waiting lists and were only given a lifespan of 17yrs and we have lived in them for 55yrs. | These are not factors considered as attributes within the policy. The property fabrication may impact on the energy efficiency of a property which would be reflected in the EPC rating, which is an attribute. |
| I think standards of kitchen bathroom etc should be included. The standard of a new build kitchen/bathroom are far better than some other houses who have had the same old kitchen/bathroom for 15/20 years but will be expected to pay the same amount of rent | These have been removed from the rent structure in order to make the policy fairer, transparent and accountable and provide greater consistency and reduce the number of differing rent levels being charged. Older properties tend to have different features to new builds (e.g. lower EPC rating, no additional toilet or parking). This is reflected in the rent setting mechanism used. |
| Older houses should not be considered the same as a new build | Older properties tend to have different features to new builds (e.g. lower EPC rating, no additional toilet or parking). This is reflected in the rent setting mechanism used. |
| If you live next to antisocial neighbours. If rent is being paid for a property, Moray Council should do more to make sure antisocial neighbours are dealt with quicker. If MC do not deal with it in a timely fashion, points should be deducted. | Outwith the scope of the policy review. There is a separate policy and procedure for Neighbour Disputes and Antisocial Behaviour which would be followed. |
| Points deducted for high crime areas and areas with antisocial behaviour | Outwith the scope of the policy review. There is a separate policy and procedure for Neighbour Disputes and Antisocial Behaviour which would be followed. |
| Temporary or homeless accommodation rent should be lowered | Outwith the scope of the policy review. Homeless accommodation rents are set in accordance with the Temporary Accommodation Charging Policy |
| How it is different for disabled people and others | The policy applies to all tenants equally. |
| You haven't mentioned anything about people with disabilities. It might be relevant. For example if | The policy applies to all tenants equally. The only factors used to calculate and to set rents are as detailed in the policy and Appendix I of the policy. |

APPENDIX I

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| <p>someone has a feature of their home which they need solely due to a disability, is it fair that they are charged extra? Perhaps you feel that disability benefits should cover this and maybe they do but I just thought it was worth considering.</p> | <p>There are no additional charges attributed to disability included in the Rent Setting Policy. Other service charges such as a charge for a warden service are separate from the Rent Setting Policy.</p> |
| <p>Antisocial behaviour to advise future tenants if it is a problematic area</p> | <p>Outwith the scope of the policy review. There is a separate policy and procedure for Neighbour Disputes and Antisocial Behaviour which would be followed.</p> |
| <p>I think it fair that as a landlord you should protect yourselves and the properties with standards review of the actual properties and do a property inspection at least every 24 months internally and make it part of the tenancy agreement</p> | <p>Suggestion noted. Outwith the scope of the policy review</p> |
| <p>As above, car port/private drive way should pay more than on street/car parking as attached to their house. Large gardens should also pay more.</p> | <p>The policy does use off street parking and garden size in calculations for charging rent. On street parking or car parks are not taken into account.</p> |
| <p>I feel people's homes should be visited and reviewed and rent charges affected by how you look after your property.</p> | <p>Noted however this is outwith the scope of the policy. There are other policies which may be applied e.g. Rechargeable Repairs Policy.</p> |
| <p>If you do consider rent increase you should make sure us paying rent should have priorities over people that don't. Getting jobs done or getting repairs done to a better standard! Can't understand why jobs are half arsed. If it was done correctly in the first placed you wouldn't need to continue to come back out to repair the job again.</p> | <p>Outwith the scope of the policy review. The Council performs well regarding the percent of reactive council housing repairs completed right first time.</p> |
| <p>Are rents linked to cost of living index?</p> | <p>Ensuring that rents continue to be affordable for tenants has been a key consideration throughout the review and policy development process. In order to minimise any adverse impact on tenants, the policy will be phased in over a period of time. During this time tenants will be provided with transitional relief. This means that the maximum additional rent or reduction</p> |

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| | in rent experienced by any tenant will be limited to £7.50 per week, until their rent changes to the amount calculated in the revised structure. The rent charged by the Council will continue to be less than other landlords and social housing providers and be the most affordable housing option in Moray. |
| Rent is significantly cheaper than private market | Noted. The Council will continue to have one of the lowest rents out all local authority and bordering social housing landlords. They offer the most affordable housing option in Moray. |
| That the rent of properties are already high enough, they shouldn't be reviewed and made more expensive. | The Council will continue to have one of the lowest rents out all local authority and bordering social housing landlords. They offer the most affordable housing option in Moray. |

Is there anything you think should be removed from the revised Rent Setting Policy?

| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|------------|----------------|------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 29 | 3.6 | 4 | 0.5 | 2 | 0.2 | 35 | 4.3 |
| No | 652 | 80.5 | 83 | 10.2 | 40 | 4.9 | 775 | 95.7 |
| Total | 681 | 84.1 | 87 | 10.7 | 42 | 5.2 | 810 | 100 |

| What do you think should be removed from the policy? | Response to suggestion |
|---|---|
| Leave rent rates where they are don't let them rise anymore | This is required in order to ensure that the Housing Revenue Account continues to be financially viable and to enable the Council to deliver ongoing investment needed to the housing stock. |
| yes the thought of any increase | Annual increases are separate to the Rent Setting Policy. The impact on individual tenants has been a key consideration throughout the review and policy development process. In order to minimise any adverse impact on tenants, the policy will be phased in over a period of time. During this time tenants will be provided |

| What do you think should be removed from the policy? | Response to suggestion |
|---|---|
| | with transitional relief. This means that the maximum additional rent or reduction in rent experienced by any tenant will be limited to £7.50 per week, until their rent changes to the amount calculated in the revised structure. Tenants told us during the earlier consultation that this was their preferred option. |
| Service charge? | The only service charge include within the Rent Setting Policy is for the communal area and heating charge and applies only to sheltered housing at Larch Court. There may be other service charges, e.g. but these are separate to the Rent Setting Policy. |
| I don't think you should charge for an extra toilet | This reflects the additional amenities that the property has and therefore the additional rent charged. Generally, those properties with additional toilets will be in newer properties. |
| A property rented from the council should give the tenants a feel of having their own home, which includes having to pay to keep up maintenance. If you buy or rent a home you can't escape that either. Money should be managed accordingly to be able to make maintenance possible and in the future will also avoid having homes uncared for costing the council even more money to set straight. A slightly higher rent would cover this. | Noted |
| A few areas need amendments some things need removed and some things need added | Cannot comment without further detail. |
| Street parking | Off street parking is an enhanced feature of the property which is reflected in the restructure in terms of charging rent. |
| I don't think you should be deciding to charge someone more rent for if they've got a garden than those without gardens. You are given an allocation. You get two chances to say no. What if both of those have gardens, but you have no interest in a garden, why should you have to pay more for a luxury you don't want? | Gardens are included in the current Rent Setting Policy as a factor for calculating rent. |

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| Did you have any other comments on the revised Rent Setting Policy? |
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| Response | Tenant | | Applicant | | Other | | Response total | |
|--------------|------------|-------------|-----------|-------------|-----------|------------|----------------|------------|
| | Number | % | Number | % | Number | % | Number | % |
| Yes | 29 | 3.6 | 4 | 0.5 | 2 | 0.2 | 35 | 4.3 |
| No | 652 | 80.5 | 83 | 10.2 | 40 | 4.9 | 775 | 95.7 |
| Total | 681 | 84.1 | 87 | 10.7 | 42 | 5.2 | 810 | 100 |

| Do you have any other comments? | Response to suggestion |
|---|---|
| think this will be fine as long as the council adhere to their own policy and don't start moving goalposts | Noted |
| I think that if a tenant carries out internal works that help you to increase the value of your property we should be rewarded by a discount on our rent | In line with legislation, there is separate provision for tenants who make improvements to their home. Section 30 of the Housing (Scotland) Act 2001, states what is a qualifying improvement and the process that must be followed. |
| Worried my increase will be more than I can afford | The impact on individual tenants has been a key consideration throughout the review and policy development process. In order to minimise any adverse impact on tenants, the policy will be phased in over a period of time. During this time tenants will be provided with transitional relief. This means that the maximum additional rent or reduction in rent experienced by any tenant will be limited to £7.50 per week, until their rent changes to the amount calculated in the revised structure. |
| The rent account is set up so we the tenants start and remain behind in rent by no fault of our own because of how the payment system is set up from the onset. | When a tenancy starts, tenants are expected to pay the rent one week in advance. This is explained at the tenancy sign up and in tenant information resources. |
| If Moray Council is reviewing the rent then houses of the council tenants should be up graded | A key aim of our investment programme is to make sure that our houses meet the Scottish Housing Quality Standard (SHQS) and the Energy |

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| | <p>Efficiency Standard for Social Housing (ESSH). All social housing landlords must make sure that their stock meets the second stage of ESSH by 2032. This will help make tenants' homes warmer and also make heating homes more affordable.</p> |
| <p>I don't think Moray Council tenants should be penalised for staying in a new build, that was offered to them and for example turning it down isn't really an option. But it means more rent than an older style property. Which is understandable but also unfair. Especially when our roads don't even get gritted etc..... fairer rent is important but increasing rent should be stopped also when if I could get one, a mortgage would be cheaper.</p> | <p>The Rent Setting Policy aims to be fairer, consistent and charge rent which is reflective of the features/benefits that a property benefits from. For example, newer properties which are more energy efficient will be charged more (as the EPC will be higher) however this may be offset by a saving in energy bills. Factors such as gritting roads are not within the scope of the Rent Setting Policy.</p> |
| <p>I'm concerned that my rent is going to be increased by the Rent Setting Policy AND by the annual rent level review, at a time of high inflation and a cost of living crisis.</p> | <p>The impact on individual tenants has been a key consideration throughout the review and policy development process. In order to minimise any adverse impact on tenants, the policy will be phased in over a period of time. During this time tenants will be provided with transitional relief. This means that the maximum additional rent or reduction in rent experienced by any tenant will be limited to £7.50 per week, until their rent changes to the amount calculated in the revised structure.</p> |
| <p>Putting up the rent the council need to make sure all housing is fit to standard e.g. insulation and damp free</p> | <p>A key aim of our investment programme is to make sure that our houses meet the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (ESSH). All social housing landlords must make sure that their stock meets the second stage of ESSH by 2032. This will help make tenants' homes warmer and also make heating homes more affordable.</p> |
| <p>You need to take into consideration the cost of living</p> | <p>The impact on individual tenants has been a key consideration throughout the review and policy development process. In order to minimise any adverse impact on tenants, the policy will be phased in over a period of time. During this time tenants will be provided with transitional relief. This means that the</p> |

APPENDIX I

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| | <p>maximum additional rent or reduction in rent experienced by any tenant will be limited to £7.50 per week, until their rent changes to the amount calculated in the revised structure. The rent charged by the Council will continue to be less than other landlords and social housing providers and be the most affordable housing option in Moray.</p> |
| <p>Rent constantly increases with zero home improvements</p> | <p>The Housing Service has an investment programme. A key aim of this is to make sure that our houses meet the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (ESSH). All social housing landlords must make sure that their stock meets the second stage of ESSH by 2032. This will help make tenants' homes warmer and also make heating homes more affordable.</p> |
| <p>I think it's very fair provided tenants understand why</p> | <p>Noted</p> |
| <p>I think if you are increasing rent you should carry out work needed in homes</p> | <p>The Housing Service has an investment programme which aims to make sure that our houses meet the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (ESSH). The income generated from council rents funds the investment programme.</p> |
| <p>All good</p> | <p>Noted</p> |
| <p>once you set something in stone. Don't go and suddenly changing it and forget to tell the tenant first. We tenants have rights. Just remember that.</p> | <p>We comply with housing law and consult tenants on rent changes and give tenants at least 4 weeks' notice of any increase.</p> |
| <p>Tenants who are spending a lot of money upgrading properties themselves should not have to pay rent increases.</p> <p>If people do not look after properties and maintain them there should be charges for the damages and maintenance costs. There should be more home inspections. People who claim benefits seem to get all the new properties and don't look</p> | <p>Tenants who make improvements to their homes will not necessarily have a rental increase. It would depend on the type of improvement and if the council have to take assume liability for the maintenance and upkeep of the upgrade. It may be that the rent does not change until the tenant vacates and the property is void. This would be discussed with the tenant when they apply for permission for the upgrade. Each case will be assessed based on its own merit.</p> <p>There is a separate Rechargeable Repairs Policy and Procedure which would address situations of wilful damage.</p> |

APPENDIX I

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| <p>after them and working people are given homes that need a lot of work doing to them.</p> | <p>The Allocations Policy provides the framework for how council properties are allocated. This includes the factors taken into account to prioritise applications. Benefits/income is not a factor that is taken into account.</p> |
| <p>It's irrelevant what we say. You will always put up the rent as much as you can get away with.</p> | <p>We act in line with housing law and consult tenants on rent changes and give tenants at least 4 weeks' notice of any increase.</p> |
| <p>I don't think that off street parking should be classed as the same as a driveway. A driveway is more private. Off street parking should be minus, as not private to a tenant. Anyone can park there A driveway would be a bonus</p> | <p>Off street parking includes private driveway, car port and garage. On street parking would be available for anyone to park in.</p> |
| <p>My own opinion is that your rents are more than acceptable for the homes and properties and if I'm honest they are quite low compared to other housing rents. I would imagine your rents are some of the cheapest in the whole country</p> | <p>Noted</p> |
| <p>I think it's unfair how I moved in just over a month ago under the pretence that my rent was stable and now I'm finding out I have to dig deep some more</p> | <p>Tenants should be advised at sign up that the rent may vary and may be subject to an annual increase, following consultation with tenants. We act in line with housing law and consult with tenants on increase levels and provide tenants with at least 4 weeks' notice of any increase.</p> |
| <p>We have an increase of rent every year, why should we get charged more rent for a kitchen that meets the standard that Moray council has set for them by the government. That's not fair to put that back on us. As for how energy efficient the property is, that's just laughable. These flats are ridden with damp and mould, not just mine. Every single person I speak to on the ground floor flats are exactly the same. It's clearly coming from the foundations and not environmental like we have been told. These flats should have been brought up to a standard years ago, not when the</p> | <p>The attributes used in the revised Rent Setting Policy have been changed and kitchens will no longer be used in the rent setting methodology. The ongoing investment programme is addressing property standards to ensure that houses meet the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (EESH).</p> |

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| <p>government put a date on it. So unfortunately I don't agree with either your rent settling policy or either of your rent increases.</p> | |
| <p>The rent should also look at older properties, and the new standards of what a property should be, eg updating kitchens, windows, insulation. Look at the council properties that are dangerous or close to main roads with no parking. If moray council are going to charge more rent then the condition and state of the internals needs to reflect that which for a lot of older council property isn't happening or leaving some houses Condemned. Older properties should be brought up to at least national standards. The tenant should not be liable for poor performance of the property because of failed upgrades or maintenance, also what tenants pay towards rent should also be revised in line with the current cost of living crisis.</p> | <p>The Rent Setting Policy aims to be fairer, consistent and charge rent which is reflective of the features/benefits that a property benefits from. For example, newer properties which are more energy efficient will be charged more (as the EPC will be higher). Factors such as roadside location are not relevant in terms of the rent charged. A key aim of our investment programme is to make sure that our houses meet the Scottish Housing Quality Standard (SHQS) and the Energy Efficiency Standard for Social Housing (ESSH). All social housing landlords must make sure that their stock meets the second stage of ESSH by 2032. This will help make tenants' homes warmer and also make heating homes more affordable.</p> <p>The improvements needed to meet the standard are mainly heating upgrades and better insulation.</p> |
| <p>The rent is very sufficient in these times. Private rents are blocked from being raised so should council houses.</p> | <p>Noted</p> |