



# Mid Rent Housing Option Public Consultation Summary of Responses Report March 2021

#### 1. Introduction

The public consultation on the proposed Mid Rent Housing Option ran for six weeks from 29<sup>th</sup> October 2020 to 10<sup>th</sup> December 2020.

Respondents were invited to comment on the draft eligibility and allocation criteria, and also its relevance and fairness, to assist the Department of Infrastructure with developing a Mid-Rental Allocation Policy prior to consideration by Tynwald.

The online survey comprised of both closed questions (requiring either a yes or no response) and free-form open ended text boxes enabling respondents to provide more detailed feedback. The consultation was divided into three parts as follows:

- Part 1 proposed access and eligibility criteria.
- Part 2 proposed pointing criteria.
- Part 3 feedback on the tenure period and on the concept behind mid-rent tenancy.

Views were encouraged from everyone and in particular, relevant stakeholders including private and public sector rental tenants and landlords.

The survey was also issued directly to Tynwald Members and Local Authority housing providers.

## **Responses to the Public Consultation**

The consultation attracted 62 responses of which 60 accessed the survey online via the Isle of Man Government's Consultation Hub. The remainder were received via email and are summarised at the end of this report.

A small number of the answers provided were not directly related to the consultation exercise, however they have been noted for consideration by the Department.

## 2. Analysis of responses received via the Consultation Hub

## **Personal Information – Categories of Respondents**

#### 1) Individuals

53 responses were received from respondents who described themselves as individuals and are categorised as follows:

**Table 1 - Summary of Individuals by Category** 

Politician (national)	1	1.7%
Politician (local)	3	5%
Private Landlord	2	3.3%
Homeowner	8	13.3%
Tenant (private sector)	29	48.3%
Tenant (public sector)	6	10%
Health or Welfare Professional	3	5%
Other (living with parents)	1	1.7%
Total	53	88.3%

#### 2) Organisations

7 responses were received from organisations and are categorised as follows:

**Table 2 - Summary of Organisations by Type** 

Local Authority	6	10%
Private Sector Letting Agent	1	1.7%
Private Sector Tenant Association Group	0	0%
3 <sup>rd</sup> Sector Housing Charity	0	0%
Other	0	0%
Total	7	11.7%

# Part 1 – Access and Eligibility Criteria for acceptance onto a Mid-Rent Housing Waiting List

The Criteria for Acceptance (Appendix A, Part 1) covers 3 areas of eligibility:

- Eligible Applicants
- Residency Qualification
- Financial Qualification

The Department has consistently reviewed the eligibility criteria throughout the pilot and in particular financial qualification has been subject to amendment in order to strike a balance between interest in to scheme and limits being either too high or too low as to provide a practicable solution for incoming tenants.

#### 1) Eligible Applicants

Eligibility wasn't specifically questioned, however respondents were provided the opportunity to feedback on the definition of an eligible applicant.

7 respondents commented on the eligibility criteria, some of which are detailed as follows.

"Doesn't that (the existing eligibility criteria) cover pretty well everyone?"

"Why 18 and above? When 17 is the age recognised as an adult for many provision of services. Many young people are working from 16 years of age."

"Why must they be 18 if they are in a job that would allow them to be suitable for this housing?"

"The eligibility criteria is similar to those used for the existing social housing and first time buyers schemes. As the stated purpose of this scheme is to provide a tax payer subsidy for rental to enable persons to save up a deposit to purchase their own property the minimum age for eligibility could legitimately be increased. Increasing the age of entrants will prevent persons accruing significant points through just being on the waiting list rather than being close to purchasing their own property. In addition, salaries usually are subject to their largest increases during their early years of employment through moving jobs and moving up salary scales with increased employment experience."

#### 2) Residential Qualification

Q1. Do you agree that an applicant must have ordinarily been resident on the Island for a minimum of 5 years to qualify for access to mid-rent housing?



73% of respondents agreed with the 5 year residency requirement.

16 respondents disagreed with the proposed 5 year residency requirements citing a range of reasons as summarised in Table 3.

Table 3

Should be 10 years/same as public sector housing	8
Should be less than 5 years	3
Too high, consider keyworkers/professionals	3
Consider residents returning to the island	2
Total	16

A sample of the comments provided by respondents disagreeing with the proposed 5 year residency requirement are listed below:

"As a Nurse, I will be returning to the UK as can't afford to stay. If I could access this scheme after 12 months I could stay. Nurses are needed. Key workers should be permitted local status the same as Guernsey."

"I think 5 years is unnecessarily restrictive and suggest 2 years"

"I think it should be ten years as a resident, the same as for public sector housing rules."

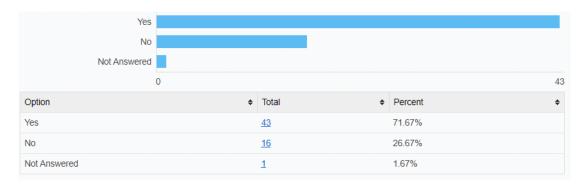
"should be ten years so that they have contributed to our society"

"No rationale has been provided for the 5 year residency qualification which is half that required for social housing. Without justification the 10 year criteria should apply to both because the person is seeking to receive a tax payer subsidy to build up personal savings"

"I think if this requirement is reduced, it will ensure that the Isle of Man can attract more highly skilled professionals from abroad to live and work here."

#### 3) Financial Qualification

Q2. Do you think the maximum income limits for access to mid-rent acceptance criteria are reasonable?



Just under 72% of respondents agreed that the maximum income limits for access to mid-rent acceptance criteria were reasonable.

There were just 2 comments provided by respondents answering 'yes' to Q2 shown in the table below.

"As long as proper financial checks are performed and regularly updated. This should not be open to abuse, unlike the current public sector renting system."

"This makes the scheme more accessible to those who fall into a 'mid-range' i.e. outside the Public Sector General housing income levels, but who may struggle to pay higher rentals in the private sector."

13 of the 16 respondents who answered 'no' to Q2 gave further feedback as to why they did not agree with the maximum income limits and the examples below represent the themes of these comments.

"Having just recently left a rental property within the private sector to buy a property. This has taken numerous years to save due to the higher rental outgoings and with a fairly average gross income the threshold of £60,000 would still have restricted the acceptability of the mid-rental scheme. A threshold of £70,000 would be more beneficial."

"I think the levels are rather high."

"I think the levels should be slightly higher because the price houses and amount to qualify for a mortgage especially if you are looking in the South of the Island would still make buying house impossible. With an income of £60,000 you would only be able to buy a house around the £285,000 mark it is near impossible to find a house in a decent state of repair for that much money in the South of the Island. Which means you need to save more than 10% deposit to get to a house that is near inhabitable."

"It should remain as existing for couples with no children, at £55,000 but include single people in the description. Increase single or couples with children to £70,000"

"Mid rent max income is far too low. This should be raised to 55-60K. Saving should be made sooner with higher tenant turn over and get more people in the market."

"Personal circumstances should be looked at. Household may have large income now but may have got into difficulties earlier in life and may be clearing debt, so large salary but small amount available each month."

"The maximum income limit seems too high as people earning 45k a year could save up a lot easier than someone on minimum wage. I think the support for buying homes should be aimed at people earning below 30K who have the hardest job getting onto the housing ladder."

# Q3. Do you think the maximum savings/financial assets level for access to mid-rent public sector housing are reasonable?



72% of respondents agreed with the maximum savings/financial assets level of £50,000 for access to mid-rent public sector housing.

Comments received from respondents who disagreed with the maximum assets/savings threshold are highlighted below.

"The current savings allowance equates to 20% deposit of a £250,000 property. Legal Fees, Surveyors Costs also need to be taken into account, so should be increased to £60,000 to allow for £10,000 disbursements."

"Savings of greater than £50K would be useful for a large deposit required to obtain a mortgage AND pay for the costs of moving in, i.e. furnishing, legals, etc. I would suggest a higher figure of £60-70K"

"50k is too high. 30K would be more reasonable so those who need the mid rent scheme to save can have the option."

#### 4) Property Ownership

Q4. If you have any comments on property ownership and access to mid-rent housing, please do

24 respondents provided feedback on this subject and the examples below represent the themes of these responses.

"Asset value to match savings allowance if it is increased."

"Current property owners should not be eligible."

"Don't discount people who have previously owned, like the first time buyer scheme does. For example, I bought a property with a partner via his work at the bank allowing for a 5% deposit. We split and sold, and I came away with £10k. I was forced back into renting and it is near impossible for me to save the 10% needed for a property whilst renting (or at the least it will be at a very slow rate). I'm not eligible for FTB as I have previously owned, despite being in the same position as many First Time Buyers. I think the asset cap covers this though."

"I agree, this scheme should help people to become property owners, not help existing property owners expand their portfolios."

"I don't think an application should be allowed to own any property, when applying for mid rent."

"I think £50,000 proceeds from sale of property is too high. People without any assets are more in need of a helping hand to save for deposits. I think preference should be given to people with zero assets."

"It would be perfect if you could offer this assistance and rent/buy the property that you want to buy...so mid rent your choice of property."

"Key workers are keeping two homes. Very, very expensive. To keep valuable healthcare staff, if you encouraged home ownership. Commitment to stay on the island would be shown and the feeling of community. At the moment can feel like the system does not want Nurses to stay, then they go back to uk and its costly to recruit again. Housing is the key."

"Recognition should be made of property ownership which may linger on following family split or divorce where property sales/settlement can be very lengthy, but in other regards an applicant may fulfil requirements."

"Should not be considered if they can live in the property."

"This should be flexible. For example, if the person has inherited a property but the proceeds may be slightly more, say 60,000 but the property has not yet been sold they effectively do not gain any benefit from it. There is no guarantee that it will be sold quickly, especially if more than one person is involved."

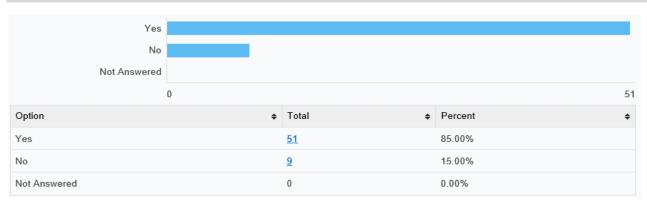
"Would the sale of the house be a requirement prior to being accepted on the mid-rent housing or could they be approved prior to the sale?"

"Would this create situations where individuals who have inherited a part share of a family home (for example) but are unable to live in that abode are excluded?"

#### Part 2 – Criteria for allocation of Mid-Rent properties

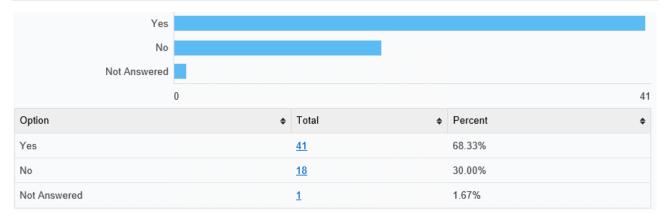
The pointing criteria (Appendix A, Part 2) is designed to ensure that those in most need are prioritised, therefore additional points can be awarded to applicants in certain circumstances and deducted when suitable offers are refused.

Q5. Do you agree that applicants should accrue points during their time on the waiting list at a rate of 1 point for each 3 months on the waiting list?



85% of respondents agreed that applicants should accrue points during their time on the waiting list. Additional comments made in response to this question were minimal and did not offer any further relevant feedback on the subject of awarding points for time on the waiting list.

Q6. Do you agree that applicants should accrue 1 point per year (to a maximum of 10 points) for each year they reside in the areas where mid-rent properties are available?



68% of respondents agreed that applicants should accrue 1 point per year for each year they reside in an area where mid-rent properties are available.

A small number of comments were provided by respondents answering 'yes' to this question, 3 of which are listed below.

"Agree but consideration being given to a global approach - i.e. a system which does not exclude an applicant from qualifying in an area outside their immediate local housing area."

"Provided there are mid rent properties broadly available throughout the island."

"The award of points for living in an area where mid-rent housing is available might be discriminatory against those unfortunate enough to live in an area where it is not available."

14 comments were received from the 18 respondents who disagreed with this criteria, examples of which are listed below.

"I don't think residence in the area is a relevant criteria"

"It seems too restrictive to require residence in the area where the mid-rent properties are located in order to acquire points. If these properties are simply for 2 year short-term stop-over leases they should equally available Island wide."

"No, because people often don't have a choice in the location they rent, so it's unfair to penalise based on that."

"No, some people on the list may want to be in a different area than they currently have rented accommodation."

"The scheme should treat the whole Island as a single area, making this proposal redundant."

"This is a small island and area should not matter, if the idea is short term rental to allow deposit saving for a house or debt payment completion then I would happily move anywhere on the island and vacate the property when able to purchase a house."

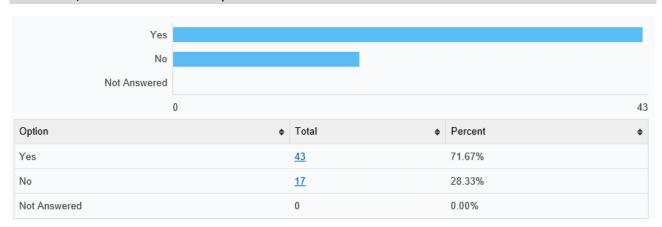
"This would create an unfair advantage to those living in the limited rental market in that area."

"Unless there was mid-rent housing available in reasonable levels in all areas of the Island this would unfairly prioritise individuals who are by chance resident in the areas these developments are created"

The main themes arising that were critical of this particular criteria are:

- Unfair could discriminate against applicants who don't live in an area where mid-rent housing is available
- Should be island-wide
- Insufficient choice of mid rent properties to justify allocation of additional points for living in a mid-rent area

Q7. Do you agree that applicants should receive additional points for dependent children residing with them, at a maximum of 15 points for 3 or more children?



72% of respondents agreed applicants should receive additional points for dependent children residing with them.

A small number of comments were provided by respondents answering yes to Q7 and these are listed below.

"Children are expensive. Having children may also limit where you can currently rent and the cost will be more."

"I agree should boost points but living as a single person paying rent is hard also and people that pay highest proportion of their incomes to rent should also get extra points."

"Should include dependent adults too eg disabilities and elderly"

"The points awarded could be fewer, as it reduces the chances for a single person or couple who would possibly move through the system much quicker. Consideration could be given to identifying categories of home (e.g., houses for families with dependants, flats for single

people/couples with no dependants). There should also be consideration of the level of dependency, e.g. age, health, etc."

13 of the 17 respondents who answered 'no' to Q7 provided feedback as to why they disagreed with the awarding of points for dependent children.

A common viewpoint was that this may discriminate against single people and couples with no children as they would not be eligible to accrue any additional points under this criterion.

Examples of the comments are provided below.

"By giving such high levels of points it would unfairly exclude single childless professionals who are struggling to save for a mortgage on one salary"

"Childless couples should be treated equally. Something for over 50 only also needed."

"Couples and Singles with no children will always be superseded using this pointing method, and restricts their options."

"Definitely not."

"I don't agree that having children should make someone more deserving of a mid-rent property than those without."

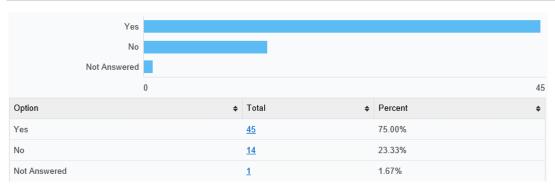
"I think you should accrue more point for dependent children but not more points for the more children you have. It is not fair to put one family before another just because they had more and more children, especially when the average family size is two children."

"Many people have children who are away at uni and still they are funded by parents, they still live with them in holidays and will return after uni but they do not count. There needs to be something in place for hardworking childless couples/single people so they too can get on the property ladder. Extra points for those with kids whilst a good idea takes away from those with adult children or no children"

"...Different waiting lists will be required for larger properties with more than two bedrooms and this should negate the need for the allocation of extra points."

"Why should a family with kids get preferential treatment for short term reduced cost accommodation over a couple waiting to have kids until they can afford them."

# Q8. Do you agree that applicants who are renting in the private sector (for 6 months or more) should receive an additional 5 points on their application?



75% of respondents agreed applicants renting in the private sector for 6 months or more should receive an additional 5 points.

Examples of comments from respondents who agreed with this proposal are shown below.

"As well as 5 points on application, additional points should also be given to applicants who are long term renters in the private sector (10 years or more)"

"It is near impossible to save whilst paying private sector rent and trying to live with a family."

"It shows that they will be diligent in paying their rent."

"Maybe it should be 5 points per year. So long term renters have a better chance."

"There should be points for each month or 3 month period in private rent"

"This, I believe will help to move people up the list fairly."

"Yes, obviously they should get points as they're in a disadvantageous position to start with and need to get out."

Of the 14 respondents who disagreed with the awarding of additional points for renting in the private sector, 8 provided their reasons why, examples of which are listed below.

"I fail to see the logic in this points system as you have excluded anyone who owns property. Therefore the only people eligible are people renting or in public sector housing - is there a need to give someone in private sector rental a 5 point advantage over public sector housing? Or more to the point, who is likely to leave public sector housing to go into this scheme while still being eligible for public sector housing?"

"I think it should be in line with public sector housing which is 1 year"

"There are desperate sets of circumstances. Renting in expensive private sector property is only one. There could be a single parent living with friends or family that are equally desperate."

"These points should be increased if they are living in sub-standard private rental, for example shared facilities, obviously with proof"

"Wouldn't everyone get these points? Not a homeowner so they must be renting, why would a social housing user move to pay more rent? They would save more staying where they are and if in position to save for a property move out sooner."

Q9. If an applicant refuses a suitable mid-rent tenancy offer, 10 points will be deducted from their application in order to ensure that an applicant in more need is offered the next available property. Do you agree that this is reasonable?



63% of respondents agreed that 10 points should be deducted from their application for refusal of a suitable mid-rent tenancy offer.

12 of the 38 respondents who agreed with this proposal provided further comments in support of their answer.

"Agree...as long as consideration of the circumstances are taken in to account."

"But caution must be exercised as to the grounds of refusal. eg unsuitable location, size of property etc."

"But taking into consideration why they have declined e.g. they may have to give considerable notice, or have just signed up to a new private tenancy which would mean they forfeit a large deposit etc"

"I think it is reasonable, however, it will be more efficient to have tiers of applications. Where people who are in dire need get moved to the top of the list."

"It is fair unless they have good reason for not accepting"

"While houses can sporadically come up for rent this is not in control of those on the waiting list and for those who are tied up with rent agreements and unable to break the agreement should not be deducted points."

"Those signing any rental agreement should ask for their current position on the list to help determine the length of agreement they should sign should a property become available."

37% of respondents (22 people) disagreed with this criteria and 16 of those provided their reasons why, some examples of which are listed below.

"10 (points) seems high, if a valid reason is given they shouldn't be penalised by so much."

"3 strikes. 3 offers reasonable"

"A better definition of "suitable" is required"

"Appendix A, Part 2 states that the deduction is discretionary for "UNJUSTIFIED refusal" The proposal is not reasonable if it fails to take into account individual circumstances e.g. if a worker at the Airport refuses a property in Jurby, this should not be considered unreasonable. An 'applicant in more need' is a completely nonsensical statement. After a refusal, the property will go to the next person on the list in any case. If there are applicants further down the list are "in more need" then the points system has failed anyway! This is punishment, pure and simple, meted out to anyone who dares to inconvenience the administrators."

"I think this needs to be carefully thought through, as there could be good reason for the applicant refusing the property. Maybe it's very far from their place of work and they don't drive, or maybe they have a disability which means the house may be unsuitable for their needs."

"If they reject a "suitable" property then taken off the list for 12 months."

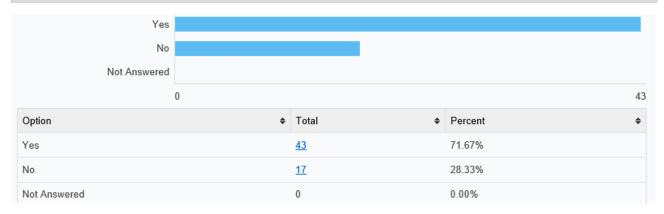
"There would need to be some flexibility with this rule, if people are tied into long term lease arrangements and unable to give 1 or 2 months' notice to quit they should not be hindered by such a high penalty"

"This won't work without clear criteria and should allow for non-car drivers."

"A suitable choice of home is a very personal choice."

"The definition of suitable needs to include location."

Q10. If an applicant has outstanding rent arrears with a public or private landlord then 10 points will be deducted from their application, and no tenancy will be offered to them until they have cleared their arrears. Do you agree this is reasonable?



72% of respondents agreed that 10 points should be deducted from an application if they have outstanding rent arrears.

A small number of comments were provided by respondents answering yes to Q10 and these are listed below:

"Agreed, not responsible tenants."

"As long as the 10 points are restored if they can demonstrate they have been out of arrear for a period of time, such as twelve months."

"Completely agree"

"Having an agreement in place whereby they are paying their rent arrears in a regular and meaningful way should also come into consideration."

15 of the 17 respondents who answered 'no' to Q10 provided feedback to explain their reasons for disagreeing with the deduction of points for rent arrears. Some examples of their feedback is listed below.

"Agree for public sector landlord but not private. It is not the department's remit to pursue private debt."

"Depending on reason for arrears then if they have private rent arrears then if they get mid range property then they must pay back arrears over an agreed timeframe. If in arrears with public sector then they won't be able to move up a rent bracket and would stay where they are until situation changes."

"Given the useless rent tribunal, how archaic some lease terms are (For example those where any dispute must be referred to an adjudicator) and there not being any code of conduct for landlords applicants should not be prejudiced against for what might be disputed arrears, also given GDPR how will this information be collected."

"I don't think they should be offered a property but they should not have points removed, there could be a very legitimate reason for the arrears. Job loss, illness. if they are working towards rectifying the situation then they should be helped not penalised."

"I think that it is sufficient to not offer a tenancy until arrears are cleared. No need to deduct points.

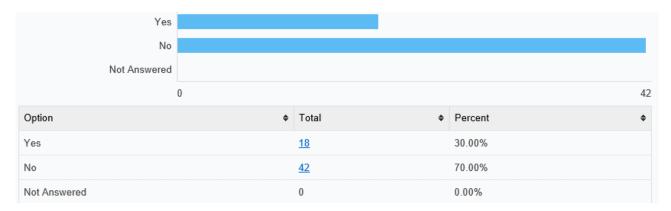
"The ability not to save or manage household budgets is a concern and this should be an applicant eligibility requirement not to have debts when seeking access to the scheme which has the aim of allow persons to save a deposit for a home."

"There is a reason this person is struggling.. this needs understanding not penalising"

#### Part 3 - Mid-rent tenancies

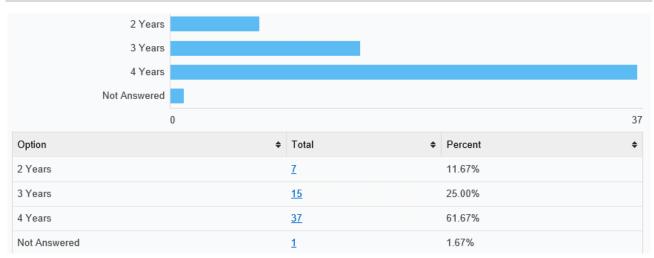
Currently, mid-rent tenancies are offered for one year, with the option to extend this for a further year at the discretion of the Department. The pilot operates this way as it was anticipated that a maximum of 2 years would be a sufficient time period for tenants to save for a deposit to buy a home. Recent activities with current mid-rent customers show that 2 years may not always be sufficient, as two customers have had to return to private sector rentals after their mid-rent tenancy could not be further extended.

#### Q11. Do you think the current maximum allowable mid-rent tenancy of 2 years is sufficient?



70% of respondents disagreed that the current maximum mid-rent tenancy of 2 years was sufficient. Q12 provides a range of alternative timescales, to gauge thoughts on what a more suitable time frame might be.

Q12. Although mid-rent tenancies must be offered on a short term basis, the Department is considering extending the time period. Which of the following options do you think should be the maximum allowable mid-rent tenancy period?



The majority of respondents (62%) felt that 4 years was a more suitable time period, followed by 25% who considered 3 years to be appropriate.

#### **Further comments about the Mid-Rent Housing option**

Just over half of the respondents (32 out of 60) gave their final thoughts on the Mid-Rent Housing option.

The 5 most common themes are listed as follows:

- 1. Supportive of the Mid-Rent Housing Option
- 2. Provide savings advice (the Department)
- 3. Minimum 2 year tenancy
- 4. Mid-rent rent is still too high
- 5. Wider range of areas needed

Some examples of those 32 comments, in line with the themes above, are detailed below.

"20% less than market rate is still too high. The rental market has been inflated by the lack of new dwellings being constructed and the lender's requirements that rent be charged at 25% above the mortgage repayment. A minimum of 36% below the market rate would account for this plus tax. Lower rents would mean tenants could actually save at a reasonable pace and then the Department could have a higher turnover."

"I believe mid-rent tenancies (something I've advocated for a long time as someone who was stuck for many years paying high rents and unable to save at all) will be the answer to a lot of the housing issues on the island and rid the island of housing problems and seedy landlords who are just profiting at other's expense and quality of life. "

"This is an interesting and welcome option for people struggling to afford to buy their first home. It would be useful to continue to maintain statistics to judge how cost effective this policy is over a 5 - 10 year period."

"In theory a great idea but will need to be available all over the Island not just one area. We considered it for the pilot however Colby was too far from where we work to make it viable financially."

"People on low incomes NEED more support asap. Most people under 30 cannot even dream of owning a property unless they get a high paid job or stay living at home which isn't an option for some people. The generations before had it much easier. This scheme seems tailored to the middle class when it's the working class that are struggling the most and need the most support asap."

"There needs to be a calculation to work out how long it would take the tenant to raise the money and if a suitable property could be found in that time. If the initial time is 2 years this could be reviewed and extended if the situation has a number of controlling factors. If it was because they were just not trying then it should end. Each situation has to be looked at on its own merit and the framework only used as a guide. E.g. young couple earning well can save £400 per month if in mid rent. 2 years plenty of time. 6 months in she falls pregnant (not planned) her salary drops as she has chosen to take time off with the baby for 8 months. Their income is cut but they are still managing to save £200 per month. They need extra time to make up the difference. This is only one example where flexibility would help. There is also illness and redundancy to take into consideration. We are not living in normal times and situations that are out of our control are increasing. I would not take on anything that would add to the current pressures of life without some sort of safety net."

"Who would administer this process? If a local authority wished to take a property out of the public sector stock to make it available to this scheme, how could this be achieved?"

"The whole point of this scheme is to help people who wish to buy a property save for a deposit or a similar lump sum. Is there some sort of agreed savings plan with targets that the midrenters sign up to as part of this scheme? If not there should be or otherwise what is the point? Unscrupulous applicants could meet the criteria, promise the earth, live for 2 years or so at a subsidised rent and blow the "savings". An agreed savings scheme would favour the genuine applicants and enable some control and regulation of the use of these properties, possibly leading to very short extension of the lease, in extreme circumstances."

"Needs to link with first time buyers mortgage schemes to support people to access a mortgage after their rental otherwise this won't work. Banks should support people who have good mid rent records and support them."

"If extending for more than a year the tenant should show that they have in fact saved the monies and not spent it on holidays, car etc"

"With all the current house building in the south of the island, it would be great to see the developers taking the initiative. Currently there are no let to buy schemes available over the 300 plus houses being built. I would not mind paying a little more in rent if it was going toward a deposit for the property I was living in, the banks would see that I could demonstrate I am paying the rent so my mortgage would be less than that. The property would have 20 year NHBC certificate, so maintenance would be minimal, any substantial repairs would be borne by the developer."

"This is a very good proactive initiative. I would say that tenancies of 18 months with a view to extending to 2 years should be the standard. Given that deposits of at least £20,000 are required to purchase a property, someone, someone earning £25,000 alone would not be able to save that in 12 months."

"This is a great idea. As someone earning 38k but with large debts (no missed payments) I don't believe I will ever manage to purchase a property as I can't save for a deposit but I know I pay more rent than my landlords mortgage on the property so know I could afford the repayments. I just need the chance to save a deposit. Alternatively if there was a deposit assistance scheme with less restrictions on earnings (allow higher salaries) than the first time buyers scheme then that would help."

"Question 12. I think this depends on how many children reside in the household or people for that matter. I really don't think x2 years is far enough if it was a couple with no children it would be very easy to do. We live with x4 children and that amount of time would be very stressful and would put a lot of pressure on us as a family."

"Extending the Tenancy period is more realistic, especially with the current pressures on house purchase prices plus uncertainties which have arisen, through extraordinary circumstances, and regarding stable employment. If this scheme is to have the positive impact hoped, it will be important to make properties under this scheme available across the Island; working with Housing Authorities to identify suitable stock, which may not necessarily be new-build, but could justify mid rent in other ways. The scenario of 'Rent to Buy' is also another important option that needs early attention."

"Rent - 20% below market rate. This is not enough to allow tenants to save the amount required for a deposit within the time period allowed. Particularly if applicants have children. Maximum annual income - how does this fit in with the means testing for Child Benefit? The consultation is based on a scheme of 5 properties, how many will be included in the new builds projected within the Area plans? Will there be a priority points system for those who occupy social housing?"

"Just please remember key workers who need residency sooner than many schemes allow. To feel part of a community need to be treated as such. Thank you."

"We really need to explore the many ways that this could benefit our island. As said already there is no reason that the scheme could not be widened to be available to more than just potential home owners. People nowadays are much more upwardly mobile & not everyone wants to buy their own home. Many European countries have a high % of rental tenants, with a model that is not simply Social OR Private sector. This must be researched, the right balance of rental properties available on island would greatly benefit our people, our potential new people, growing the economy. Lastly the current model for social housing is much too complicated, there are simply too many landlords, all with much varying standards, policies etc; there is far too much political bureaucracy. This needs centralised & simplified."

"The discount and the timeframe would mean the only people who would benefit from this would be people who could achieve home ownership without the help. Rather than looking at income, an analysis of disposable/saveable income should be done. Those who could easily save without assistance should not be given a handout. Assuming a rent of £1,000 discounted by 20% giving an additional saving of £200 per month, equating to £2,400 a year. Assuming a matching contribution by the applicant savings of £4,800 a year might be attained. Assuming an amount required for the deposit, fees and other expenses occurred in purchasing the house a fund of at least £20,000 would be required it would take over 4 years to save."

"Should be available for open market property .is the property you want to buy."

"The points scoring system needs to be reviewed holistically with consideration of the likely end result of who qualifies rather than consulted on independently and in isolation from the overall impact. Having said that I'd like the exclusion criteria (income, assets and IOM residency) to be tiered in a points scoring system rather than be hard lines that exclude people. This method will always create scenarios where people fall between the cracks or being unable to qualify for the scheme but unable to get help to get on the ladder."

"This proposed scheme could fill an obvious gap within the current first time buyers scheme and public sector housing provisions. Provided the criteria is not weighted in favour of dependent families as they already have provisions within existing schemes. I feel there needs to be more availability/provisions for young persons/single persons without children."

"The access and eligibility criteria appears to be based on social housing access and eligibility criteria rather than providing short duration housing a lower rent to allow saving for a deposit over a small number of years. The pointing and minimum criteria would need significant change to do this from that currently proposed. The proposals should not adversely skew the commercial private rental market. The use of newly constructed properties in new housing estates has the ability to do this. The mid rent housing proposals could be co-ordinated with existing social housing portfolios. If the mid rent properties were located within or on the boundaries of these existing social housing estates they would meet the aims of the scheme and would not adversely impact on the private rental market where potential tenants will pay more rental for the location, house type and the fixtures/fittings. The Commissioners' believe, as previously proposed to the Department, the local authorities are best placed to co-ordinate social housing and mid rent through their existing involvement in local authority public sector housing and their commercial rent portfolios to provide access to a wider range of properties to more people in town locations which are better served by existing local facilities and employment opportunities."

### 3. Responses received by email/letter

**Two** respondents provided their thoughts, comments or recommendations about the Mid Rent Scheme via email. Both emails were more general in outlook and furthermore related to personal circumstance, not relevant to the scope of the consultation.

#### 4. Conclusion

The Department thanks all respondents for taking the time to complete the survey and for providing their considered response. All responses have been considered and are assisting the Department to further develop the allocation policy which will be brought to Tynwald as Secondary Legislation.