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Dear Amanda

### **Re: Consultation response to 'A revised regulatory framework for social housing in England from April 2012'.**

Thank you for the opportunity to respond to the above consultation. After considering the consultation document I can confirm that overall the City of York Council support the proposed revisions in that they reflect the direction of the Localism Bill, support the Government's revised role for the housing regulator and give clarity around outcomes and expectations required of the standards.

However an area of concern is the application of the serious detriment test which must be applied and found to be complied with before any intervention by the regulator. Since the threshold of the test is high before any intervention can take place by the regulator this approach could allow poor performing landlords to exploit the situation. This could lead to a 'regulatory gap' where failures to meet the standards will in effect, be tolerated if they do not pose a risk of serious detriment

Yours sincerely

Steve Waddington  
Assistant Director Housing and Public Protection