



Renters' Rights Bill: Consideration of Amendments

A year after the government promised to scrap Section 21 "immediately" and deliver security for renters, thousands continue to be evicted under this unfair and damaging system. **Since the Government have been elected (July 2024), over 70,000 people have been threatened with homelessness due to a Section 21 eviction notice.**¹

The Renters' Rights Bill is now in its final stages. Its passage will mark the most significant reform to private renting in decades - but renters will not be secure in their homes until the Bill is not only passed but fully implemented. Shelter is calling on the government to:

- Ensure the Bill's core protections are maintained during the passage process, resisting amendments that would weaken renters' security, open the system to risk of abuse, or reduce its intended impact.
- Pass the Renters' Rights Bill into law without further delay.
- Set the commencement date - when Section 21 is abolished and other reforms will take effect - to be three months from the date of Royal Assent.
- Publicly confirm the commencement date at the time of Royal Assent, to ensure renters, landlords and support services can prepare fully and begin to communicate clearly with the public as soon as possible.

As the Bill returns to the Lords, we recognise the vital role peers play in ensuring legislation is robust and fair. However, we are concerned that several amendments risk diluting the protections the Bill was designed to deliver. Shelter respectfully urges members of the House of Lords to reject amendments that risk undermining the Bill's core protections:

1. **Lords Amendment 11: introducing an additional pet damage deposit.** This would reintroduce financial barriers for tenants with pets, particularly those on lower incomes, and would weaken the protections introduced by the pet-friendly provisions in the Bill. The current 5-week deposit cap is more than sufficient for the vast majority of pet related deposit claims, which in turn are rare.
2. **Lords Amendment 18: reducing the no reletting ("restricted") period from 12 to 6 months.** Recent high-profile cases have demonstrated how easily landlords will be able to use eviction for sale grounds disingenuously, only to relet the property at a higher rent, if the restricted period is set too short.
3. **Lords Amendment 53: expanding student repossession grounds beyond HMOs, to one bedroom and two-bedroom properties let to students.** This amendment would deny a group of renters the vital security and stability offered by the Renters' Rights Bill, many of whom will be in employment or with caring responsibilities; situations in which stability is critical for their lives.

¹ Shelter analysis of MHCLG statutory homelessness statistics, Table A1.



4. **Lords Amendment 64: introducing a new ground for possession for property which is required for a carer for the landlord or landlord's family.** Would introduce a broad and open-ended possession ground, which risks being open to abuse and therefore undermining the Bill's core aim of providing security for renters.

DELIVERING A ROBUST RENTERS RIGHTS BILL

- 1.1 The Renters' Rights Bill has the potential to rebalance the scales between landlords and tenants. Shelter has campaigned throughout the process for the government to deliver a robust Renters' Rights Bill that genuinely delivers the security and protections needed to truly be able to mark the reforms as transformational for tenants.
- 1.2 While the Bill misses the mark on some crucial aspects - such as limits on rent increases within tenancies; measures to prevent unfair use of guarantor requests locking low income renters out; and evidential safeguards in the eviction system against abuse by landlords - **the version of the Bill that passed to the House of Lords in January was strong, and contained numerous improvements on previous attempts at reform:**
 - The full abolition of Section 21 evictions and fixed term tenancies
 - Longer notice periods for key possession grounds
 - A move to open-ended tenancies with flexibility for tenants to serve notice and protection from eviction in the first year
 - Protections against abuse of eviction grounds through a no reletting (or "restricted period")
 - A ban on discrimination against households claiming housing benefit and with children
 - A limit on rent in advance payments to 1 month
 - The introduction of a private rented sector database and expanded powers for local authority enforcement teams
- 1.3 However, some of these key reforms are at risk of being watered down by amendments in the House of Lords. The below changes would undermine core protections in the Bill, as well as rendering some aspects of the Bill ineffective.

Shelter opposes Lords Amendment 11, which would introduce an additional pet damage deposit.

- 2.1 Additional pet damage deposits will create a financial barrier to renting with a pet which will disproportionately affect renters on lower incomes, in turn, having an adverse effect on those who are already struggling to secure a home.
- 2.2 Landlords are already able to request a 5-week deposit to cover any damage to the property. Based on current rent data, the current cap amounts to an average of £1620 up-



front cost to secure a tenancy.² With the additional three weeks that could be asked of pet owners under Lords Amendment 11, this would reach £2592.³

- 2.3 According to the Tenancy Deposit Scheme, there were only 23 pet damage deposit claims in the 3-month period they investigated, a tiny proportion of the total adjudicated disputes.⁴ At the same time, this amendment risks creating increased costs and barriers to accessing tenancies for the thousands of pet-owning renters in England. This is disproportionate.
- 2.4 The average *reported* cost by landlords of pet-related damage was £300, compared with £775 for non-pet related damages.⁵
- 2.5 Equally, it must be acknowledged that **almost half (48%) of private renters have no savings**.⁶ Any amount they may have been able to put aside is likely to be largely consumed by meeting the upfront *unrecoverable* costs of moving (£669 on average), the initial 5-week deposit, and first rental payment.⁷
- 2.6 In an environment where rents are increasing and almost half of renters have no savings, an additional pet damage deposit will create an insurmountable financial barrier for many.

Shelter opposes Lords Amendment 18, which will reduce the 'no reletting period' from 12 months to 6 months.

- 3.1 The introduction of a 12 month no reletting period was a critical improvement made to the Renters' Rights Bill; it is absolutely vital in deterring abuse of possession grounds 1 (moving self or family member into the property) and 1A (sale). Following private rented sector reforms in Scotland, research from the Nationwide Foundation found that 1 in 5 landlord sale evictions did not end up in a sale of the property.⁸
- 3.2 The recent high-profile case involving the former housing minister demonstrates how easily landlords and agents could claim they are, for example, selling the property, only to relet it at a higher rent shortly after. The restricted period provides a clear, and significant deterrent against such behaviour. However, at six months the disincentive will not be great enough to deter abuse. Landlords with larger margins or portfolios will be able to wait this period out to later replace tenants and secure higher rents.

² Shelter analysis of ONS data on private rents.

³ Ibid.

⁴ TDS, Pets and private renting: how to balance tenant rights with landlord protection, August 2025

⁵ Ibid.

⁶ MHCLG, English Housing Survey 2023-34, July 2025

⁷ Shelter, unwanted moves cost renters more than half a billion pounds a year, April 2024

⁸ Indigo House and Nationwide Foundation, RentBetter: Wave 3 final report, September 2024



- 3.3 It has been argued that 12 months, without being able to let a property, could undermine supply and leave homes empty. However, this risk is overstated; a strong 12-month restricted period would act as an effective deterrent against unlawful, dishonest eviction. As such, because the policy is a deterrent, rather than a penalty – we should expect to see very few landlords evicting without genuine intention to sell a property and thus few homes being left empty.
- 3.4 The strong deterrent will also encourage landlords consider their intentions fully and, for example, take concrete steps towards selling a property before initiating possession proceedings. Therefore, provided the policy is well enforced, the numbers of properties removed from the market and left empty, will be minimal.

Shelter opposes Lords Amendment 53, which would expand the student repossession grounds beyond HMOs, to one bedroom and two-bedroom properties let to students.

- 4.1 Shelter opposes the extension of ground 4A to smaller properties to protect security of tenure for students for whom annual evictions will cause significant disruption. Extending ground 4As application from HMOs to any property in which the tenant meets the student test risks unnecessarily uprooting renters who ought to benefit from the new security of tenure.
- 4.2 According to HESA, the profile of undergraduate students is changing. The proportion of students aged 30 and over enrolled in first degree courses has increased over the past five years, rising from 11% to 15%.⁹ Mature students are more likely to be parents and/or have jobs, which means they need to remain in place from year to year. These students will likely be living in the smaller properties affected by this amendment.
- 4.3 Further, the cycle of the academic year is significantly less important for 1 and 2 bed properties that are not HMOs. On the rare occasion that students leave the tenancy outside of the academic cycle, these properties – particularly 1 bed homes which likely were housing professionals, mature students and parents – could readily be let to non-student tenants.
- 4.4 Lastly, this amendment risks opening the ground up to abuse as it blurs the line between “student lets” and the wider rental market and, in removing the requirement for the property to be an HMO, has less clearly enforceable evidence requirements. Shelter strongly opposes changes that open up the system to abuse by unscrupulous landlords and therefore undermine core changes (the end of section 21 evictions and fixed term tenancies) in the Bill.

Shelter opposes Lords Amendment 64, which would introduce a new ground for possession for property which is required for a carer for the landlord or landlord’s family.

⁹ HESA, Higher Education Student Statistics: UK, 2023/24 - Student numbers and characteristics, March 2025



- 5.1 While we recognise the importance of carers, creating additional eviction grounds risks opening the system to abuse and undermining the security of tenure that renters ought to benefit from under the new periodic tenancy system.
- 5.2 It is particularly important to guard against the risk of abuse to the system where the situation in question is niche and uncommon. Little evidence has been provided as to the frequency of the situation in which a) the landlord has a property close by, b) the carer is not a family member and c) the carer is from a local organisation providing visiting care.
- 5.3 This ground is open to misuse as it would be almost impossible for a renter receiving a notice under this ground to assess whether it is valid i.e. the landlord genuinely needs and intends to move a carer into the property.
- 5.4 Equally, challenging a notice of this kind could be deeply uncomfortable for a renter who is unlikely to know their landlord's personal circumstances. Many renters receiving an eviction notice will simply begin the process of moving rather than challenging it, risking unnecessarily uprooting families from their homes.
- 5.5 There should be no new grounds but at the very least, if this ground is adopted, it should be discretionary to ensure that a judge can review the evidence properly and balance the renters' right to home against the landlord's situation and whether there would be another way for a carer to be housed.

THE NEED TO PASS AND IMPLEMENT THE BILL QUICKLY

- 6.1 **Each month that Section 21 remains in force, nearly 1,000 households could be removed from their homes by bailiffs following a no-fault eviction notice.** Between July 2024 and June 2025, **over 70,000 people have been threatened with homelessness due to a Section 21 eviction notice, and 11,400 households were removed from their home by bailiffs.** Without swift passage and implementation, thousands more face homelessness unnecessarily.
- 6.2 As the Bill enters its final stages, it is vital that MPs and Peers understand that renters will not be secure in their homes until the Bill is passed and implemented. The Government must not only deliver the legislation, but also ensure it takes effect quickly and clearly.
- 6.3 Shelter is calling for a commencement date of three months from Royal Assent, and for that date to be publicly confirmed at the point of Royal Assent. This will give renters, landlords, and services the clarity they need to prepare – and prevent a dangerous vacuum of uncertainty.
- 6.4 Shelter's advice and legal teams are already seeing renters mistakenly believe Section 21 has been abolished. Some are failing to defend themselves in court, wrongly assuming judges will reject claims. This confusion will only grow after Royal Assent if no date is announced.



*"We are already seeing evidence of confusion in our advice hubs and on our court duty desks... people are choosing not to defend Section 21 claims on the assumption that judges will reject them automatically."
– Shelter letter to Minister, August 2025*

6.5 Shelter's Digital Advice Team, which supports millions of renters each year, warns it will be "very difficult" to inform tenants effectively without a set date. Our teams are preparing new content and advice now – but the longer the gap between Royal Assent and implementation, the harder it becomes to build trust and deliver accurate guidance.

6.6 While some landlords and agents will seek to update their understanding once the Bill is passed, many will remain reactive to the changes. A three-month window strikes the right balance: it gives time for responsible landlords to adjust, while encouraging disengaged landlords to catch up quickly. A longer delay risks entrenching confusion and inaction.

6.7 Shelter and partners across the housing sector are preparing to help renters understand and assert their new rights. But we cannot do this effectively without a clear, fixed commencement date. Without it, the opportunity for strong, unified communications – and renter confidence – will be lost. We strongly encourage the government to announce the commencement date at the same time as Royal Assent; and to opt for a short transition period – between three and six months – to minimise confusion, uphold tenant confidence, and limit homelessness caused by Section 21 evictions.

If you require further information about the bill and the contents of this briefing, please contact Shelter by emailing public_affairs@shelter.org.uk