

Challenging a rent increase – How easy is it for renters to use the Market Rent Determination Form and the associated Guidance?

Generation Rent October 2026

The Renters' Rights Act provides better protections for tenants challenging a rent increase at First-Tier Tribunal for an application fee of £47. The new law means that if a higher rent is decided, it will no longer be backdated, and the Tribunal cannot award a higher rent than what the landlord has asked for. In addition, the end of Section 21 evictions might make tenants feel more confident to challenge an unaffordable rent increase, as the risk of a retaliatory eviction is significantly reduced.

Landlords must use a Section 13 notice to propose a rent increase. Tenants can then challenge the rent increase through the new [Form MR1](#), which is then submitted to the First-Tier Tribunal to help them determine the current open market rent (OMR) of the property.

What is Form MR1?

This is a 22-page form and asks the tenant to provide detailed information to put forth the case that the rent increase is too high so that the tribunal can determine the OMR. Determinations by the tribunal are made using information submitted on these forms as well as their own expertise, so this written evidence is crucial in them deciding whether a rent increase is valid or not.

Given the increased importance of the tribunal for renters, as a result of these new protections, Generation Rent wanted to understand how easy the Form MR1 is to complete, alongside understanding the associated Guidance. We asked members of our Renters' Panel to read through [Form MR1](#) and its associated [Guidance](#). For this task, we asked them to imagine they were completing the Form based on their most recent rent increase in their current home. Where respondents had not experienced a rent increase in their current home, we asked them to imagine that their landlord had asked them to pay £100 more per month.

KEY FINDINGS

Number of participants: 40

Overall, the most common response was that the Form and Guidance were neither easy nor difficult to understand. Most respondents felt relatively confident that they could complete the Form independently, and most felt they understood which questions applied to them, and which did not.

There was, however, slightly less understanding of what makes a Notice of Increase valid or invalid, suggesting that this could be an area where clearer information or examples would be particularly helpful.

When asked how easy it would be to gather all the information required by the Form, no respondents said they would find this very easy. Similarly, no respondents felt particularly confident in understanding what factors might influence the level of OMR. Measuring room dimensions and providing internal and external photos of the property were highlighted as particularly difficult information to obtain.

Respondents highlighted a number of barriers to completing the Form:

- Some people with ADHD, dyslexia and other learning disabilities found it difficult to get through the entire Form.
- People were unclear about what evidence they should provide to support their proposed OMR.
- Completing the Form could be time-consuming, particularly where tenants needed to take photographs and provide the dimensions of each room.
- It may not always be possible for tenants to know what improvements or works a previous tenant carried out to the property.
- Respondents found it difficult to propose a specific OMR because similar properties in their area were advertised at a wide range of prices. In addition, these are only advertised rents and as landlords cannot accept higher than this, it is likely that agreed rents would be lower.
- In areas dominated by owner-occupied properties, there may be too few comparable rental properties available to help tenants determine what a reasonable rent should be.

Respondents suggested that the Form could be improved by:

- Making it shorter and more concise.
- Making it possible to tick boxes rather than requiring written responses wherever possible.
- Using plainer, more accessible language.
- Providing clear examples of valid and invalid Notices of Increase.
- Requiring less specialist information from tenants.

“I was unable to complete the form; it made me dizzy. I have ADHD”

“It is far too long with too much information and as someone with AuDHD and Dyslexia it was an impossible task due to overwhelm.”

“The form was overwhelming and induced breathlessness and panic”

Rent increases experienced by respondents:

The mean rent per month that participants were paying at the time was £1015.77. Around two thirds of respondents had experienced a rent increase in their current home, with most having experienced this within the last year. Participants experienced a mean rent increase

of 13%. Rent increases ranged from £30 to £300, with an average of £82. In percentage terms the range was between 3% and 31%, with an average of 8%.

Just over half of respondents used their own experience of a rent increase, while the remainder used the hypothetical scenario of a £100 monthly increase.

Respondents were roughly evenly split on whether they would have chosen to challenge a rent increase through the OMR determination process or accept the proposed rent increase. However, people who had faced a rent increase were less likely to say they would challenge the increase. Ten of 25 who had an increase would have challenged it, and just over half of those who had not faced a rent increase would have challenged it.

	Respondents who used their own experience of their last rent increase	Respondents who used the hypothetical scenario of a £100 increase
Mean current rent per month	£1049	£901
Mean rent increase	£130.82	£100
Proportion of respondents who would have challenged the proposed rent increase	40% (8/20)	69% (11/16)
Mean proposed OMR	£1367.50	£781.82

Most renters would propose an OMR higher than they were currently paying, with about a third proposing either a lower rent than they currently paid, or the same.

Proposed OMR in relation to what respondents currently pay	Number of respondents
Lower OMR than current rent	4
Same OMR as current rent	3
Higher OMR than current rent	11

There was little difference between how respondents set OMR in relation to the proposed rent increase between the groups using the hypothetical scenario and those using their own rent increase experiences. In both, the majority of participants set the rent increase to lower than was proposed.

Reasons for a lower rent

Respondents identified a number of factors that they felt could justify a lower rent, including reasons that would likely be accepted as valid by the tribunal and reasons that would not.

Valid reasons participants identified to justify a lower rent:

- The poor state or overall condition of the property, including little or no maintenance being carried out.
- Seeing similar properties advertised at lower rents.
- Outdated décor or properties that have not been modernised for decades.
- Landlord breaches of the law or harassment.
- The condition of the property and history of maintenance or repairs.
- Noise and antisocial behaviour in the area.

Invalid reasons participants identified to justify a lower rent:

- Housing benefit caps limiting what tenants can afford.
- A lack of affordability for tenants, particularly pensioners.
- A tenant's record as a good tenant
- The length of tenancy.

"I have to be able to afford it. I will be scrimping with very little quality of life"

"A decent home should be a basic human right. Landlord's greed should be cut"

Most respondents said that they would not have requested an inspection or a hearing, or were unsure whether they would have done so.

If they said yes to requesting an inspection this was because:

- To prove tenants have kept property in good condition
- To show disrepair and lack of maintenance from landlord

Overall Recommendations:

- Consider shortening the Form where possible.
 - o The Form should be as concise as possible to reduce the time and effort required from tenants, particularly those with learning disabilities, dyslexia, ADHD or those who are neurodivergent.
- Use clearer, plainer language throughout the Form and Guidance.
 - o Avoid using technical terminology or specialist terms throughout both documents.
 - o Spell out what references to certain parts of the Act mean, e.g. a Section 14 (A1) appeal.

Recommendations for specific Questions/Sections:

- **Question 1.1** – indicate what section of the Act each option relates to.
- **Question 4.2** – Provide clear information about valid or invalid Notices of Increases through examples. Although this is in the guidance, the form could include a note at the side to summarise what elements are relevant, namely: notice period, time since rent last set, date of increase, your details, and form signed correctly.
- **Question 5.6** – set out what section 22 and section 14(A1) applications are; there is a line at the start of Section 4 which does this for section 13(4) and section 14(A3) applications. It would also help to include reference to these applications in the guidance. Unfortunately, one of the guidance documents that makes reference to section 22 is from 2024.¹
- **Question 5.7** – it is unclear what an original tenancy might mean and how a different tenancy might replace it. Please reframe this question for clarity or include an example.
- **Question 6.7** – Rather than requiring tenants to measure and provide dimensions of each room, consider adding in a section about Energy Performance Certificate (EPC) ratings asking:
 - Is there an EPC?
 - If yes, is the EPC valid?
 - If yes, what is their EPC number?
 - The square meterage of the property stated in the EPC.
- **Question 10.1** – consider addressing this question in the guidance as it is difficult for current tenants to know exactly what improvement work has been carried out by former tenants
- **Section 11** – include a note to point tenants to their tenancy agreement for this information.
- **Section 12** – Restate briefly what the OMR means in relation to the legislation, i.e. what the property would let for if let to a new tenant in its current condition. Clarify, in the guidance, what evidence tenants should provide to support their proposed OMR through examples of what reasons for a lower rent are likely to be valid or invalid.
- **Question 16.1** – include a summary of valid reasons for reimbursement.

¹ <https://www.gov.uk/government/publications/first-tier-tribunal-residential-property-rent-cases-t540>