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# Improving the Private Rented Sector

## A private rented sector policy for Hammersmith and Fulham

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## **FOREWORD**

A safe, secure and affordable home is a fundamental aspiration for everyone. Whether a home is owned, rented privately or from the Council or Registered Housing Provider (or Housing Associations) we know a good, decent and safe home contributes positively to health, wellbeing, stability and society. Having somewhere to call home is a crucial foundation for everyone; providing warmth, comfort, a space to be ourselves, and a place to enjoy with our families and friends.

And yet, Britain's housing rented sector requires major reforms. The historic failures of the former government policies have led to declining rates of home ownership, increasing tenure insecurity and a significant increase in people unable to access rented homes or to own their own homes. The PRS today is the most unaffordable and insecure of all housing tenures, with lower housing standards and limited recourse to challenge injustices and redress with landlords.

What renters need today is a significant change in national policies to improve their rights, security, and raise standards. The new government is taking significant steps to bring this about through the Renters Rights Bill. We will work with the new government to introduce these much-needed reforms especially:

- increased security in tenancy agreements and an independent arbitration service
- greater regulation and compliance to standards through a national register
- fair rent levels
- introduction of a Decent Homes Standard (DHS) for the sector.

We want H&F to be the best place to live in London where residents can thrive and fulfil their ambitions. Affordable, accessible, secure and high-quality private rented housing is what residents have told us they want and need. We want to work with all landlords to achieve this. The Council is pleased that the sector recognises the need for improvements to ensure that private rented housing for residents is affordable, fair and secure as this will promote long-term sustainability for both private renters and landlords.

This policy builds on strong local collaboration and wide-ranging engagement with private renters, landlords, and other stakeholders. It describes how we will collaborate with the new government on our shared ambitions to improve oversight of the sector and bring about a more just and balanced housing market for all.

**Cllr Frances Umeh**  
**Cabinet Member for Housing and Homelessness**

## **EXECUTIVE SUMMARY**

The Private Rented Sector (PRS) in H&F has grown significantly in the last two decades and now accounts for approximately 30,000 properties. This has been driven by historical national policy failures that paved the way for a reducing social housing and owner occupy housing sector.

We have excellent landlords in the borough that provide a good service that an increasing number and diversity of residents rely on. However, national and local evidence shows parts of the sector are exploited by the rogue and unscrupulous behaviour of some landlords, agents and intermediaries. Furthermore, a significant minority of PRS homes in the borough are poorly maintained and are unaffordable for local residents, with families living in fear that they could lose their home with little notice or justification.

A safe, secure, and affordable home is essential for everyone, and we want to make housing standards among the best in London. For many years, H&F has been delivering a comprehensive set of measures designed to improve the experience of private renting in our borough, by driving up standards through effective regulation and enforcement – led by our Private Sector Housing team. Our licensing schemes are at the heart of this long-standing approach and target support to areas that need it most.

This policy brings a renewed focus to what is needed to raise standards in the PRS. We have engaged and consulted extensively with local residents and landlords to develop our four priorities for the sector, with key commitments under each:

- Priority 1: Working together with residents and private landlords
- Priority 2: Improving private rented quality, maintenance, and standards
- Priority 3: Delivering comprehensive enforcement action
- Priority 4: Building a more inclusive and accessible private rented sector.

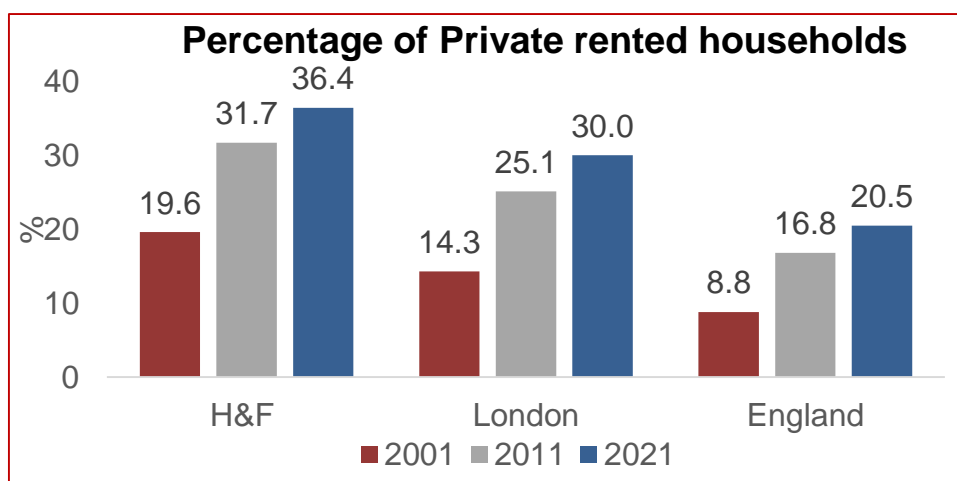
We will work to deliver against these priorities, but what we need most urgently is significant national reforms to improve renters' rights, security, and housing standards. The new government's Renters Rights Bill is exactly what the sector needs now, and the Council will work with the government to implement these reforms. We need tenancy reform that provides real security for private renters; a new independent arbitration service; a new national PRS register of all landlords and their properties; fair rents; and a new decent homes standard for the PRS.

## **WHAT THE PRIVATE RENTED SECTOR NEEDS TODAY**

### **The growth of the PRS in H&F**

The PRS in H&F has grown significantly in the last two decades and is now the largest tenure, accounting for approximately 30,000 properties. As a result, H&F has one of the highest densities of private rented properties nationally.

Over this time, the PRS has become more diverse with a wider range of residents relying on it for their housing needs. This includes; more mobile residents including those renting seeking to own their own home; those unable to access social housing and relying on benefits to pay their rent; and those that can be vulnerable to unscrupulous / rogue landlords, agents and intermediaries in the shadow economy. This policy is for all private renters in the borough, with a particular focus on the latter two groups, given they can be economically vulnerable to some landlords, agents and intermediaries who seek to discriminate against them.

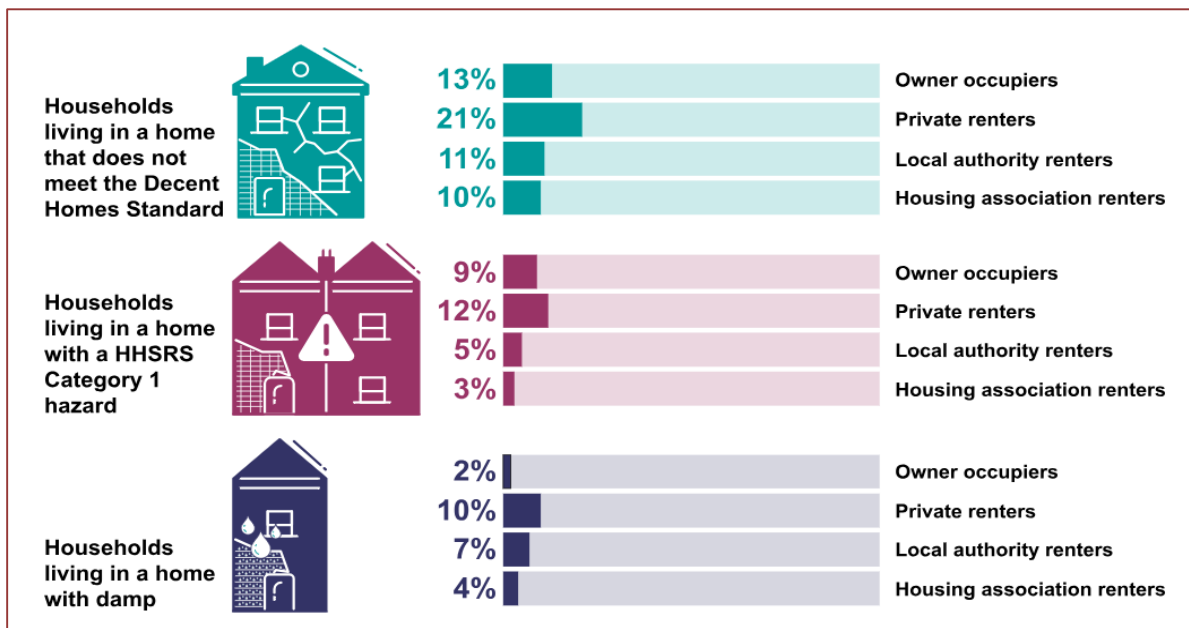


The growth in the PRS has been driven by national policies such as the introduction of Assured Shorthold Tenancies, the Right to Buy scheme, historic low levels of social housing construction and the significant uptake in low-interest buy-to-let mortgages. Increasing the supply of genuinely affordable and accessible homes was strongly supported in the consultation on this policy. This Council is committed to increasing the number of genuinely affordable and accessible homes in the borough, with the target for 3,000 new affordable homes to be built or underway by 2026.

English Housing Survey data shows that PRS homes are more likely to fall short in housing standards, when compared to socially rented and privately owned homes<sup>1</sup>. In 2022-23, the English Housing Survey estimated that 21% of PRS homes were non-decent, meaning they were unsafe, cold, in a poor state of repair or without modern facilities.<sup>2</sup>

<sup>1</sup> English Housing Survey 2022 to 2023: housing quality and condition. Available [here](https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition/english-housing-survey-2022-to-2023-housing-quality-and-condition).

<sup>2</sup> English Housing Survey 2022 to 2023: housing quality and condition. Available [here](https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition/english-housing-survey-2022-to-2023-housing-quality-and-condition).



This national survey suggests thousands of homes in the borough may suffer with safety hazards, poor heating or insulation, or outdated kitchen or bathroom amenities. In a 2021 survey of 99 private renters, we found that 68% were satisfied with the service provided by their landlord.<sup>3</sup> This had decreased to 49% in the 2024 consultation on this policy.<sup>4</sup> Of the private renters in our 2024 survey, 37% said they were unhappy with the quality of their housing.

This has arisen because the sector lacks sufficient regulation to enforce and drive standards, so that good landlords can demonstrate their compliance. Today, the PRS is the least secure of all tenures, with a complex tenancy system. Renters withhold concerns about poor and unsafe conditions because of a fear they will be evicted through no-fault Section 21 evictions, with just two months' notice.<sup>5</sup> Nationally, cases of families being evicted by bailiffs in 2023, because of no-fault evictions, rose by 40% compared to the previous year.<sup>6</sup> For this reason, more and more people are presenting as homeless and requiring temporary accommodation in the borough.

Many exemplary landlords and estate agencies operate within the borough. They provide an important service to private renters, and some are also residents of the borough. They are hugely valued, and we want to retain them. But some unscrupulous landlords and agencies have been known to operate in the borough. Through this policy and resultant enforcement actions, we seek to put those parties on notice and clamp down on such practices.

We also know that the high cost of renting is the biggest concern for some PRS residents living in the borough. Recent economic instability and inflation have fuelled record rent

<sup>3</sup> Appendix 5, Survey of tenants in H&F PRS. Available [here](https://democracy.lbhf.gov.uk/documents/s117609/PAC%20Report%2019%2020%20July%202021%20Private%20Sector%20Housin%20g.pdf).

<sup>4</sup> Note: Survey answers in 2021 did not include a "neither satisfied, nor dissatisfied" option.

<sup>5</sup> DLUHC. (February 2023). Reforming the Private Rented Sector. Available [here](https://committees.parliament.uk/publications/33924/documents/185831/default/).

<sup>6</sup> Guardian. (February 2024). Renters in England face rising no-fault evictions as reform bill delayed again. Available [here](https://www.theguardian.com/society/2024/feb/08/renters-in-england-face-rising-no-fault-evictions-as-reform-bill-delayed-again).

rises across London. Rental growth on newly let properties during 2023 peaked at 17% in inner London,<sup>7</sup> with the median monthly rent for a two-bedroom flat in H&F being £2,319 – the 4<sup>th</sup> highest in London.<sup>8</sup>

We also know that many renters face discrimination from the sector in multiple ways. The PRS is demonstrably more difficult to access for; Black and minority ethnic groups; foreign nationals; Disabled people; people who have children; single parents; and people in receipt of benefits. This policy will seek to challenge discrimination and discriminatory practices, and will seek to better inform and empower renters in the borough.

This policy has been developed because the PRS today is the most unaffordable and insecure of all housing tenures in the borough, with lower housing standards and limited recourse to challenge injustices and redress with landlords. The growth and diversity of the PRS warrants taking a fresh look at what's needed in H&F to work better with residents and good landlords, raise standards, ensure obligations are understood and enforced, and deliver a fairer, more inclusive and accessible PRS. This policy sets out our plan to transform the experience of private renting in the borough and to make housing standards among the best in London. To support this, what renters need today is a significant change in national policy to improve their rights, security, and raise standards, which is set out below.

## **Tenancy reform and Section 21**

Section 21 of the Housing Act must go. There is a clear consensus that the abolition of Section 21 would be a transformational reform that would give private renters greater security and confidence to exercise their rights. It is extremely encouraging to see that the new government's Renters Rights Bill seeks to abolish this and implement a single and simpler tenancy system for the PRS.

We support scrapping Assured Shorthold Tenancies (ASTs) and replacing them with open-ended periodic tenancies. This will provide renters with greater confidence, security of tenure and the basis for them to challenge bad practice without fear of retaliation. Periodic tenancies will afford flexibility to renters so that they are not trapped into agreements for significant periods, when a property is of an inadequate standard.

The new tenancies should only be ended on defined grounds, most of them involving default by the renter. It is right that responsible landlords have clear and robust grounds for possession and we support the new government's intention to expand and strengthen them, whilst ensuring unscrupulous landlords cannot misuse grounds. Students will also benefit from open-ended tenancies, but with appropriate possession grounds for landlords to exercise if the property is required for a new group of students in line with the academic year.

We also recommend that landlords who evict private renters with a stated intention to sell their PRS property, must be held to honour that intention so that this route is not abused

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<sup>7</sup> Hamptons (2024). Rental index data. Available [here](https://www.hamptons.co.uk/research/rental-index-data/).  
<https://www.hamptons.co.uk/research/rental-index-data/>

<sup>8</sup> H&F BI data, August 2024.

to evict a standing private renter. Research by Generation Rent sheds light on a practice in which an apparent intention to sell can be used as a proxy to evict.<sup>9</sup> A 12-month embargo should be placed on re-letting such properties, to deter this practice.

### **Private Rented Sector Landlord Ombudsman**

To improve the rights of private renters and raise standards, we need an independent arbitration service for the PRS. We welcome the Renters' Rights Bill intention to introduce a PRS Landlord Ombudsman, which all private landlords in the borough will be required to join, including those who use a managing agent. Nationally the vast majority (94%) of landlords are individuals, with the majority (71%) having no current or previous membership of any professional organisation. The Affordable Housing Commission went so far as to conclude that the PRS, "was in large part made up of "amateur landlords".

The new ombudsman will put the PRS on an equal footing to the social rented sector, providing a formal route for private renters to complain about a landlords' actions or behaviours. Landlords will be required to register and comply with ombudsman decisions, and we will be able to enforce if they don't. The ombudsman will help landlords to improve their complaint handling practices and learn if fault is found. We also support landlords having access to alternative dispute resolution means, to resolve issues with their private renters.

### **Private Rented Sector landlord register**

In the UK, there is no single coherent framework for understanding what the PRS is, who lives there, and who owns these properties. Leading academics and experts agree that the sector needs a comprehensive PRS annually updated landlords register. We recommend that landlords should be legally obligated to provide details about themselves, their properties, rent levels, and adherence to a new DHS as part of the register. This should also extend to PRS managing agents who must register, pay registration fees, and comply with appropriate training and accreditation standards.

A PRS register, facilitated through a digital property portal is long overdue, as England lags behind its neighbours in implementing this vital piece of regulation. It is excellent to see that the Renters Rights Bill<sup>10</sup> speaks of such a register. The register will be 'win' 'win' for all stakeholders and will be an important step in reforming the sector and bringing greater transparency and accountability. For landlords, we learnt through the consultation undertaken on this policy that good local landlords welcome more guidance and support. The register will provide a central portal for landlords to demonstrate their compliance and access guidance relevant to their obligations. And for private renters, the register will provide them with the information they need to take informed decisions and understand their rights. We welcome the new government's commitment that a landlord will not be able to market a dwelling, or exercise most possession grounds, unless there is an active landlord entry in the register.

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<sup>9</sup> Generation Rent. (May 2022). Evictions in Scotland - what do we know? Available [here](https://www.generationrent.org/2022/05/25/evictions-in-scotland/).

<sup>10</sup> Renters Rights Bill, (2024). Available [here](https://publications.parliament.uk/pa/bills/cbill/59-01/0008/240008.pdf).



For H&F, the register will provide us with a trusted and up-to-date source of data on PRS properties in the borough not within one of our licensing schemes. It will enable a more systematic, efficient and targeted approach to non-compliance and enforcement, including against non-registration with the register, and to pursue civil penalties under the Housing and Planning Act 2016. The register will also help us understand the scale of overseas property investment in our borough, as we are seeing many properties remaining empty that could otherwise be homes for residents.

### **Prohibiting rental discrimination**

The new government's Renters Rights Bill sets a positive ambition to tackle discrimination that we know exists in the sector. The Bill identifies, in particular, support for those households who are in receipt of housing benefits, as well as those households with children, who can fall victim to discrimination.<sup>11</sup> It is unacceptable for a landlord or agent to refuse a tenancy based on a household being in receipt of benefits or having children, or based on their ethnicity, gender, sexual orientation, Disability, or any other protected characteristic. We welcome the detail set out in the Bill to tackle the various forms of discriminatory practices that exist in the PRS.

### **Fair rents and rent stabilisation**

The high cost of renting is the biggest concern for our residents, as shown through our consultation. Recent economic instability and inflation have fuelled record rent rises across London. Rents in the borough are amongst the very highest in the country. This is unsustainable, and these unprecedented rises mean the case for rent stabilisation is clear.

Internationally, much research and debate has taken place on the efficacy of interventions to manage rents, and there is a growing consensus that rent stabilisation measures within tenancies may be needed to protect private renters from unreasonable rises in heated markets. The Renters' Rights Bill proposes that, in future, landlords will be able to increase rents once per year to the market rate (the rate that would be achieved if the property was newly advertised) with two months' notice to the private renter. Private renters will be able to challenge increases beyond market rates at the First-tier Tribunal.

We believe what is needed locally for the PRS is fair rents. We welcome the simplification to a single process by which landlords can raise rents. Importantly for residents, under the Bill landlords and agents will be required to publish an asking rent for their property and it will be illegal to accept offers made above this rate. But we believe the government can go further on this issue. Where price pressures exist such as in H&F, stabilisation should be index linked to the lower of local wage growth or the Consumer Price Index (CPI), and rises should be annual, with at least four months' notice for the tenant.

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<sup>11</sup> Renters Rights Bill, (2024). Available [here](https://publications.parliament.uk/pa/bills/cbill/59-01/0008/240008.pdf).  
<https://publications.parliament.uk/pa/bills/cbill/59-01/0008/240008.pdf>



We are of the view that landlords should be legally required to submit details of the rents they charge, specifically as part of an annual submission to the National Landlord's Register. This will provide transparency for renters, landlords and government agencies to ensure that rent increases are kept in line with local wage growth or CPI. These steps are essential in regaining control of a rental market that has become prohibitively expensive for many residents, and those who would aspire to be renters in our borough.

The Tribunal will be a vital mechanism to stop unscrupulous landlords using rent increases as a backdoor to eviction. For a number of the national reforms, it will be essential that there is sufficient capacity in the court system to provide confidence to both landlords and private renters.

### **Decent Homes Standard**

A Decent Homes Standard (DHS) can no longer be overlooked for the PRS. This is essential for creating a healthier, happier, and more stable living environment for private renters. By ensuring that all rental properties meet certain standards, we can begin to eliminate substandard housing, reduce health risks, and enhance the overall quality of life for renters. Renters have a right to expect their homes to be warm, free from drafts, damp, and mould, and to be well maintained by landlords who are responsive to these issues.

We support the new government's plans to set a new DHS for the sector through the Renters' Rights Bill and to apply 'Awaab's Law' to the sector, setting clear legal expectations about the timeframes within which landlords must take action to make homes safe where they contain serious hazards and be liable to legal action and offer compensation to private renters if they fail to meet their duties.

The DHS should also include obligations on letting agents to advertise DHS properties only; that landlords and letting agents must undertake appropriate training; and that there must be obligations to provide safe domestic utilities and safety certification, and adequate internet capabilities. The new government has indicated that it will push for Energy Performance Certificate (EPC) C-rating as the minimum requirement for properties to be let in the long-term. We support this move, whilst recognising that further work is needed to look at financial and tax instruments to assist landlords in meeting the costs of upgrading their properties.

The DHS must also factor in an accessibility standard, with renters having a right to accessibility adaptations. There are nearly 10 million Disabled people living in England, nearly 20% of whom are living in the PRS. Our population is also getting older, and domestic adaptations need to be more commonplace to support independent living.

The definition of a DHS must evolve and improve to help meet our environmental ambitions, harness the benefits of emerging technologies, and provide more accessible homes for our communities. Standards should therefore be reviewed at reasonable intervals.

## **Renter's Charter and Landlord's Code of Conduct**

A new Renter's Charter should be developed, together with input from renters from all backgrounds, to provide an accessible guide that helps renters understand their rights and obligations. It should explain how issues such as rent increases and stabilisation measures, the DHS and eviction processes work. Good legislation and regulations are not enough if people are unaware of how to exercise their rights. Many residents in our consultation were unsure of where to find more information, or who to turn to in times of hardship, and this would be a valuable tool to tackle the lack of information.

The charter should also explain private renters' rights in relation to having a pet. The Renters Rights Bill seeks to support responsible pet ownership so that landlords cannot unreasonably withhold consent for renters wishing to have a pet at home. We support the new government in these progressive steps, recognising that suitable insurance cover will ensure a satisfactory arrangement in the vast majority of tenancy arrangements.

In addition to the Renters Charter, we also need a Code of Conduct for landlords, as no such mandated code currently exists. H&F introduced a [Landlord's Charter](#) in 2017, encouraging landlords to commit to best practice in managing housing standards, living rent, and security of tenancies. The purpose of a national code should be to provide an accessible guide that helps landlords to understand their rights and legal responsibilities in relation to areas such as the PRS register, possession grounds, rent increases, rules regarding pets and mechanisms for private renter redress with the landlord, specifying completion timeframes for works or repairs, and standards of customer satisfaction.

## **OUR PRIVATE SECTOR HOUSING TEAM**

For many years, we have been delivering a comprehensive set of measures designed to improve the experience of private renting in our borough, by driving up standards through effective regulation and enforcement. At the heart of this long-standing approach has been our PRS Licensing schemes, which have required some landlords to register their properties and offer a decent standard of housing. As part of the [H&F Plan 2023-2026](#), we have re-affirmed our commitment to continue to deliver targeted regulatory action, support the supply of new affordable housing, and work with residents, landlords and partners to raise housing standards.

The Council's Private Sector Housing Team takes a multi-disciplinary approach to improving the PRS, working across Trading Standards, Environmental Health, and Housing and Homelessness services to deliver a range of statutory duties and discretionary work to improve our local PRS. Their work includes inspecting private homes using the Housing Health & Safety Rating System and managing our property licensing schemes, to help reduce anti-social behaviours and encourage landlords to raise standards. The team also inspect high risk buildings (over 18 metres in height) and have other responsibilities such as dealing with minimum energy efficiency standards, empty properties, and other public health related nuisances.

Measures driven forward by our Private Sector Housing Team in recent years have included:

- Clamping down on the small number of landlords that deliver poor standards, and imposing financial penalties and prosecutions against those guilty of offences.
- Launching and incentivising sign up to H&F's Landlord's Charter.
- Promotion of the London Landlords Accreditation Scheme and membership of recognised landlord associations.
- Enforcement action taken against hazardous housing conditions and failure to comply with legal obligations, including the largest fine we have ever secured against a private landlord.
- Securing affordable home ownership and rental products to meet the needs of Home Buy clients.
- Assisting private renters to obtain Rent Repayment Orders.

Activity of this nature would be supported further, and improved, with the introduction of the PRS register. We welcome the new government's New Burdens Doctrine and commitment to fully fund the net additional costs that fall on local councils as a result of national reforms to the PRS. We look forward to learning more on this as we work closely with the new government on the reforms that the sector needs.

Our PRS Housing Team will play a pivotal role in the long-term delivery of ambitions throughout this policy, to better support local renters and good landlords.

## **OUR STRATEGIC PRIORITIES**

In developing this policy, we developed an evidence base on the PRS in the borough (see Appendix 1) and undertook a comprehensive public consultation to understand the views of local renters, landlords and letting agents. The messages were clear; high rents, low housing supply, and poor housing standards are some of the biggest challenges for private renters and the sector.

To ensure the local PRS can deliver for our residents in the long-term, we have adopted four strategic priorities based around these challenges. They are:

- Priority 1: Working together with residents and private landlords.
- Priority 2: Improving private rented quality, maintenance, and standards.
- Priority 3: Delivering comprehensive enforcement action.
- Priority 4: Building a more inclusive and accessible private rented sector.

Our unique approach responds to what residents have told us they need, but also to leading thinking and business intelligence insights, which provide the evidence we need to bring about change. These priorities must be underpinned by the national reforms set out earlier.

The commitments in this policy reflect the need to continue with existing support and enforcement action, but also expand and explore new ways to improve what we do, learning from other areas and pioneering our own ideas.

### **PRIORITY 1: WORKING TOGETHER WITH RESIDENTS AND PRIVATE LANDLORDS**

We won't achieve an improved PRS without understanding the views of private renters and landlords. Our priority is to continue to listen to and work with local people to help improve the local private rented experience. In developing this policy, we consulted with local renters, residents, landlords and letting agents through focus groups, interviews and an in-depth online survey, across 270 participants. Our consultation was key to learning more about the needs of local people, in the spirit of doing things with residents, not to them. Private renters have told us they are worried about the high cost of renting, and many feel their properties are not up to standard, with limited routes to recourse.

#### **Our Commitments**

**Renter's voice and engagement:** We will actively listen to residents to better understand what more we can do to improve our approach. We will also use our Residents Voice work to test and challenge how we do things, ensuring we hold ourselves accountable for delivering commitments. We will put private renter engagement at the heart of our strategic approach, working closer with representative groups and agencies in delivering this policy.

**Better public awareness:** We understand that the regulatory framework around private housing is complex and not every renter knows their rights. We will work with the new government and new PRS Landlord Ombudsman on our shared ambitions to improve the

sector. We need their help in introducing a national Renter's Charter and Landlord's Code of Conduct to standardise practice and improve understanding of rights and responsibilities.

Locally, we will be proactive and improve our own web-based resources and our relationships with estate agents and landlords, to ensure landlords and private renters are provided with full information about what they should expect, and what the Council can do to help. This will include providing information about changes in national legislation, the right to request an EPC, Disabled Facilities grants, and routes for redress. Advice will be available in more than 100 languages, and we will aim to have excellent customer service and build a culture of awareness about the barriers to housing that residents from protected groups, or those with additional needs, can face.

**Landlord's forum:** We will establish a new H&F Landlord's forum to work with the many good landlords in the borough, and promote high standards across the sector, ensuring that landlords are aware of their responsibilities. We will also listen to the barriers they face in providing high quality accommodation, and tackle practical barriers between H&F and landlords in discharging their duties. We will also promote and raise awareness of national reforms, such as sign up to the National Landlord Register.

We will host an annual Landlord Conference to bring together sector experts and local landlords, to share ideas, and take forward improvements in landlord practices locally, whilst offering support to landlords encountering difficult situations such as intentional non-payment of rent, as was an issue raised through our consultation.

**Tenancy sustainment:** We will work through H&F Link to sustain tenancies in the PRS to prevent homelessness. This includes brokering private rented accommodation for households faced with homelessness, as an alternative to temporary accommodation. Our Dedicated Tenancy Sustainment resource offers up to 12 weeks resettlement support for any resident placed in the PRS. This includes ensuring that universal credit payments are made swiftly, and providing Discretionary Housing Payments (DHP) in certain circumstances to cover shortfalls in rent.

We will continue to provide residents with additional support needs with transport for viewings and in some cases host accompanied viewings with social care officers. The service also acts as intermediary between private renters struggling with their rent arrears and their landlords to mitigate their situation – accessing DHPs or other funds to preserve or extend tenancies.

**Ethical debt collection:** H&F has led the way in local government since 2017 with an ethical debt collection policy. We remain committed to an ethical approach, where we maximise income collection using ethical, fair, supportive, consistent, and proportionate means; thereby helping residents to enable them to pay their Council Tax. We also offer a range of emergency support options for residents most in need.

**Delivering our statutory duties:** We are making use of powers under the Homelessness Reduction Act 2017, discharging our prevention and relief duty by helping applicants access housing in the private sector within 56 days of them coming to us with

a housing issue. In 2023/24, we helped to house 221 homeless households into safe and decent PRS properties. The service also provides a fast landlord vetting and matching service. However, the high cost of renting in H&F means we face more challenges in supporting residents to stay living locally, in part due to the previous government freezing the Local Housing Allowance from 2020 to 2024. Improved security of tenure and rent stabilisation measures will help to recalibrate these issues but we will continue to work with more local landlords to help more residents to stay in the borough.

**Rough sleeping and homelessness:** Homelessness is an ever-growing national crisis, requiring increasing levels of emergency support. We are at crisis point, with record levels of households presenting as homeless, requiring significant levels of investment in temporary accommodation. We will deliver on the commitments of our Rough Sleeping and Homelessness Strategy, ensuring there is complete support to private renters at risk of sleeping rough, and working with private landlords and Registered Providers to increase access to housing for rough sleepers.

## **PRIORITY 2: IMPROVING PRIVATE RENTED QUALITY, MAINTENANCE, AND STANDARDS**

We want the right homes for our residents; homes that are safe, affordable, and of a high standard, and meet our net-zero ambitions. A DHS for the sector is long overdue, and we have made the case for why and how that needs to be introduced. Responses in our consultation told us that the quality of properties in the PRS is a key concern. Nearly 40% of people in our survey had quality issues, including; damp and mould, poor heating, cosmetic repairs, broken fixtures such as windows and doors, and slow resolution of these issues. Some renters spoke of the need for support, and for recourse to raise concerns about these issues, without fear of reprisal.

### **Our Commitments**

**Private sector licensing:** We will continue delivering our ambitious selective and additional PRS licensing schemes. This covers 24 streets until 2027 – meaning that rented properties and the landlords who rent them are under enhanced scrutiny to ensure good housing standards.

In 2023/24, 7,863 PRS properties were covered by either selective or additional licensing schemes. This allows substantially greater powers of inspection and enforcement to ensure our residents live in safe and healthy homes. We will build our evidence and intelligence to inform whether the scheme's expansion can deliver further benefits, beyond improvements from a new national PRS register. This will help us adopt a more targeted means to detect unlicensed landlords, including expanding data-sharing and monitoring of on-line platforms advertising private rentals.

The introduction of a new national PRS register would help us to streamline our processes, enhance data accuracy and improve compliance across our schemes.

**Our local landlord's charter and accreditation:** We know that raising landlord awareness of best practice is key to raising standards, getting ahead of issues before they arise. We support the introduction of a national Landlord's Code of Conduct to better

inform landlords. In the meantime, until that code comes forward, we will continue to promote the London Landlord's Accreditation Scheme and membership of recognised landlord's associations, such as the National Residential Landlords Association. We will also continue to promote other accessible materials, such as the guidance that Citizen's Advice offers to both PRS landlords and private renters.

We will encourage and incentivise all landlords in H&F to sign up to the H&F Landlord's Charter, with discounted property licencing fees and prioritised working relations for those estate agents and landlords who sign up. We will endorse case exemplars to our many residents seeking housing within the borough.

**Increasing the supply of affordable energy efficient homes:** We know from our consultation and other research that the supply and availability of affordable homes is a key challenge for our borough. This is principally owing to supply side failures of historical national policy. However, we will continue to demand that developers build 50% genuinely affordable homes on their residential developments and apply the highest possible planning, and design standards to ensure all new major developments are as energy efficient as possible. This includes ensuring that 3,000 new energy efficient affordable homes are built, or underway, by 2026.

Delivery of our affordable homes programme will contribute to our affordable housing supply challenges, but this will not meet everyone's needs. We will continue to ensure we achieve robust nominations agreements with all registered providers of social housing. We will also explore opportunities to increase affordable housing supply in private developments, including through acquisitions and untapped arrangements with other social and PRS landlords.

**Leading in safety:** We will deliver safe housing solutions by supporting high standards in the PRS, working with the third sector to support victims of domestic violence, and where possible, minimising the number of children in bed and breakfast accommodation. Our PRS team will continue to inspect private homes using the Housing Health & Safety Rating System, inspect high risk buildings, and enforce against hazardous housing conditions.

**Greening the private rented sector:** The first objective of H&F's Fuel Poverty Strategy is to reduce energy bills for residents. We will help retrofit old and inefficient housing stock, promote take up of retrofit measures, and address installer capacity through the H&F Retrofit Strategy. We also want to support our landlords to embrace these changes and the positive effects this offers everyone and our environment.

We will enforce minimum energy efficiency standards and support landlords to go beyond this, taking steps to help private renters at risk from excess cold. We will help inform renters about their rights to ask their landlord for an EPC, and ensure landlords are aware of their obligations under the Energy Act, which requires that rented homes must achieve a minimum of an EPC E, or otherwise spend £3,500 getting closer to this target. The new government has signalled that it will set aims for PRS homes to meet a level of EPC C by 2030, which we support, backed by financial and tax instruments for landlords.



We will promote uptake of grant schemes and energy audits that encourage private renters to request home improvements.

### **PRIORITY 3: DELIVERING COMPREHENSIVE ENFORCEMENT ACTION**

We have many exemplary landlords and estate agencies in the borough. They are hugely valued, and we want to retain them. But some unscrupulous landlords, agencies and intermediaries have been known to operate in the borough and exploit residents, and swift enforcement action will be taken to drive them out.

In our consultation, renters and landlords recognised that Councils need the right funding and powers to enforce effectively. Renters often asked for effective ways to report issues to hold poor performing landlords and agents to account. We will be bold in taking tough action to clamp down on those who seek to exploit and underserve our residents.

Through our Private Sector Housing Enforcement Policy, we are delivering comprehensive enforcement measures. We have also adopted the [London Lettings Enforcement Policy](#) which sets out how we will address issues related to tenancy deposits, letting agency fees, charges and [redress schemes](#). Whilst we have issued several penalties for non-compliance, we know there is still more work to do. We will continue to work collaboratively with the [National Trading Standards Estate and Letting Agency Team](#), proactively seek additional resources that can support our residents, and require that estate and letting agents provide the essential materials our residents need to make informed decisions and know their rights.

#### **Our Commitments**

**Comprehensive enforcement action:** We will continue to enforce robustly against inadequate maintenance and poor management. We will take measures to improve protections for residents and enforce against hazardous housing conditions and compliance failures. This means using the full range of our powers including the use of civil penalties and our Housing and Planning Act powers. We will register and track complaints, recording how they are resolved. We will also track Enforcement Notices served alongside the number of Financial Penalty Notices issued, ensuring they are paid.

Research tells us that Houses of Multiple Occupation (HMOs) can sometimes attract unscrupulous landlords, agents, and intermediaries seeking to exploit renters.<sup>12</sup> Our PRS Housing team have secured convictions against unlicensed HMO landlords, issuing significant fines, and recovering legal costs. This work will continue to safeguard our residents from exploitation, put other substandard landlords on notice, and drive-up standards. In extreme cases, through our licensing schemes, we will prohibit landlords from renting out properties in our borough.

Partnership working, between Council teams and with external agencies such as the NHS, Police and the Fire Brigade will be central to our approach to enforce against antisocial behaviour, and other offences. We will also work in partnership with the Mayor

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<sup>12</sup> Cambridge House / University of York. (August 2020). Journeys in the shadow private rented sector. Available [here](https://ch1889.org/wp-content/uploads/2023/11/JourneysintheShadowPrivateRentedSector-FullReportAugust2020.pdf).  
<https://ch1889.org/wp-content/uploads/2023/11/JourneysintheShadowPrivateRentedSector-FullReportAugust2020.pdf>

of London by investigating complaints, generated through the Mayor's Reporting Line, which are referred to us.

**Delivering 'good' enforcement:** We will continue to deliver on the principles of good enforcement, carrying out enforcement action in a transparent, accountable, proportionate, and fair way, in line with our Private Sector Housing Enforcement Policy. We will actively advise and work with landlords to help them comply with the law and ensure that key policies and messages are set out on our website, and are accessible.

**Accreditation and redress:** We will take enforcement action against those landlords and letting agents who are not members of the planned PRS Landlord's Ombudsman, the property [Ombudsman](#) or the [Property Redress Scheme](#), and those who do not display their fees in accordance with the regulations or provide inaccurate information.

The Renters Rights Bill proposes the introduction of a national redress scheme in the form of an ombudsman, of which membership will be mandatory for all PRS landlords. We will then have the power to issue civil penalties and/or fines for those PRS landlords who fail to join and fail to act on the ombudsman's directions. We support government proposals to introduce civil penalties of up to £7,000 for initial breaches (if they could have reasonably been prevented), and up to £40,000 (or criminal prosecution) for repeated breaches.

**Empty Homes:** We will join up our approach across the Council to ensure that privately owned empty homes are brought back into use and use enforcement powers where owners won't engage. Where dwellings have been vacant for a long time and the owner is failing to restore it within a reasonable time, we may start statutory enforcement action. We will further explore the case for additional specialist provision for locating empty properties and bringing them back into use, and to maximise availability to our residents.

We will also review and make use of new penalty powers afforded through the Levelling Up and Regeneration Act 2023, to charge a 100% council tax penalty where properties are left empty for 12 months. We will also look at more effective strategies including the potential of enforced sale if there are arrears of council tax, and placing a charge on the property to recover costs of works in default by the owner. We would seek the new government's support as current housing laws (Empty Dwelling Management Orders, or Compulsory Purchase Orders) do not provide a practical means for dealing with empty homes.

**Short-term lets:** We will act against unlawful short-term lets being let out beyond the 90-day annual limit without applying to the Council for permission first. This area of the market needs much tighter regulation and is open to illegal practices by landlords, letting agents, and sub-letting renters. We would advocate that the new government should discourage PRS landlords from entering the short-term and holiday let market through regulation and equalising the tax treatment for all forms of private letting. The lack of data on short-term lets makes enforcement challenging, and local councils need tools to better identify these properties within their areas, with better cross-borough data sharing.

**Letting agencies:** The borough is home to many reputable agents, who provide a dependable and efficient service to residents each year. However, insufficient national regulations have fuelled a small hidden economy of biased agents who rarely face justice. National research has found agents active in illegal activity in the sector, ranging from deliberate overcrowding, paperless tenancy agreements and cash payments, through to intimidation against renters who may have little recourse to counter with.<sup>13</sup> Renters in our consultation typically were less satisfied with the performance of their letting agent than with their landlord, or the quality of the property they rent. We need to better understand the letting agent market in the borough and how we can work together to improve private renting in the borough.

#### **PRIORITY 4: BUILDING A MORE INCLUSIVE AND ACCESSIBLE PRIVATE RENTED SECTOR**

Housing is a key component of inequality in the UK, and there are long-standing inequalities with regards to ethnicity, age, sex, sexual orientation, and disability, among other protected groups. Housing has the potential to both cause, and be a tool to address, inequalities that exist in today's society.

It is promising to see that the new Renters Rights Bill is taking a strong focus on tackling discriminatory rental practices, and we will play our part locally. We will work with the new government to deliver a new DHS that delivers a more accessible and inclusive PRS.

#### **Our Commitments**

**Tackling discrimination:** There are long-standing inequalities in housing in the UK with regards to race and disability, and we are committed to making H&F the most inclusive borough in the country. We know some ethnic groups to be overrepresented in overcrowded and poorly insulated PRS homes.<sup>14</sup> Residents from overseas and Disabled residents are also likely to have more challenges in accessing accommodation in the first place.<sup>15</sup> This is something we are already addressing in our [Disabled People's Housing Strategy](#).

We will tackle discrimination in the sector that threatens the ability of some residents to secure accessible, secure, and safe housing. Drawing on the lessons from our Disabled and Older People's Resident Commissions, and our pioneering co-production initiatives, we will work to drive out discrimination and unfairness in the PRS and help people with additional support needs to ensure that the local PRS works for them. We will also seek to enforce provisions within the Renters Rights Bill to ensure children, families and people claiming benefits are not unfairly penalised when seeking to secure a home.

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<sup>13</sup> Cambridge House / University of York. (August 2020). Journeys in the shadow private rented sector. Available [here](https://ch1889.org/wp-content/uploads/2023/11/JourneysintheShadowPrivateRentedSector-FullReportAugust2020.pdf).

<sup>14</sup> Gulliver, K. (2017). Racial discrimination in UK housing has a long history and deep roots. Available [here](https://blogs.lse.ac.uk/politicsandpolicy/racial-discrimination-in-housing/).

<sup>15</sup> Grant, S., Peel, CH. (2015). "No Passport Equals No Home": An independent evaluation of the 'Right to Rent' scheme. Available [here](https://naccom.org.uk/wp-content/uploads/2019/04/No_Passport_Equals_No_Home.pdf).

We will proactively prevent discrimination by raising awareness of what constitutes discrimination – and related rights and obligations among landlords and private renters – through an information campaign and our landlord forum. Through our engagements and consultation, it's clear that renters and landlords see significant value in knowing more about tackling inequality and their legal responsibility to do this. We will support local renters so that they have somewhere to turn when they are discriminated against, particularly those who may have additional support needs, and those who are exploited or excluded for being themselves.

**Disabled facilities grants (DFGs):** Some Disabled residents face a significant challenge in accessing homes adapted to meet their needs, in an already highly competitive housing market.

Renters have a right to accessibility adaptations, and PRS standards should adhere to the UN Convention on the Rights of Persons with Disabilities. Nationally, the new DHS must adopt a social model of disability, to ensure homes are adapted to meet their needs. We will continue to offer grants to help eligible Disabled people adapt their home and live independently. We have found locally that some Disabled residents are not aware of the funding available or are dissatisfied with the process and length of time it takes. We will review how we are performing and ensure improvements are made.

**Wraparound support:** We strive to be a compassionate and inclusive Council. We will provide wraparound support to residents with additional support needs, helping to negotiate accommodation with private landlords at LHA levels so that the property is affordable to benefit-capped households. This includes offering landlords incentives to bridge the gap between the LHA rate and market rents, in addition to carrying out checks to ensure that the property meets decent standards. The previous government froze the LHA rates from 2020 to 2024, at a time of unprecedented inflation, and this has been disastrous for many families. The new government should revisit the LHA to ensure it reflects the real living costs of all residents.

**Refugees and Asylum Seekers:** Everyone deserves a safe home, including those fleeing war, persecution, and conflict. Refugees and asylum seekers are welcome in our borough. They make significant contributions to our community and economy, and we value the diversity they bring. We will continue to work with the UK Home Office to rehouse refugees and work with local landlords to achieve this.

Our PRS Housing Team has a dedicated officer working in partnership with *Clearview*, the Home Office Property Procurement Service. The team is developing a database, listing properties being used for the purpose of accommodating refugees and asylum seekers, with the aim of proactively dealing with complaints-handling and property inspections on behalf of refugees and asylum-seeking residents. Again, the new national PRS register would help provide a more holistic view across the sector.

**New housing development:** We will continue to ensure that at least 10% of all new housing in the borough meets the London Plan standards on wheelchair accessible housing, and that 90% of new homes meet the M4(2) standards, which require step free access and a range of other design features to enhance home accessibility.

## **MONITORING AND REVIEW**

Developing this policy has strengthened our local PRS evidence, but also provides a clear and comprehensive account of our aspirations to improve the quality, affordability, and security of local PRS accommodation.

A Council delivery group will monitor progress against the commitments in this policy, some of which are reliant on more government funding. This will be led by a senior officer within H&F, who will carry out a review after one year of the policy being adopted, to ensure our actions are having the desired impact.

## **Appendix 1: Strategic Evidence Base**

This appendix sets out a high-level overview of the PRS in H&F which has been used to inform this policy.

### **The growth of the private rented sector**

The PRS is now the largest single tenure in the borough, accounting for approximately 30,000 properties (36% of homes in H&F).

A range of national policy decisions have led to exponential growth of the sector. Since 1980, the UK has experienced a shift in tenure composition because of: the introduction of Assured Shorthold Tenancies in 1988 and the end of Protected Tenancies; the introduction of Right to Buy in 1980; growth in buy-to-let mortgages during a period of low interest rates; and significant growth in house prices which has made purchasing unaffordable for many people in London. These influences have contributed to a prolonged contraction in the number of socially rented homes, a reduction in home ownership, with concurrent expansion of the PRS.

Growth in the PRS, however, may be levelling off with the introduction of a further stamp duty surcharge on new purchases since 2016, increased tax burdens, and reductions in tax relief, and rising interest rates.<sup>16</sup> Indeed, many of the landlords we spoke to were concerned about these pressures making their business model unviable, leading to higher rents or exiting the market. However, the New Economics Foundation estimates that between 2021/22 and 2025/26, PRS landlords will be in receipt of over £58bn of local housing allowance and universal credit benefits payments, as there remains an insufficient supply of social housing nationally and policy announcements under the previous government.

Increasing the number of genuinely affordable and accessible homes in the borough remains a high priority of the Council's Housing Strategy, with our ambition being for 3,000 new affordable homes to be built or underway by 2026. Increasing the supply of affordable homes was strongly supported through our consultation, and we are continuing to build social rented homes through our development programme, and we will require that developers build 50% affordable homes on their residential developments.

### **Standards in the PRS**

The English Housing Survey finds that 21% of England's homes in the PRS could fall short of the DHS, the minimum legal threshold that must be met by socially rented properties. As we have discussed, PRS homes are more likely to fall short when compared to socially rented and privately owned homes.<sup>17</sup> Although London performs better than the national average, there are still likely to be thousands of homes in the borough with either safety hazards, poor heating or insulation, or outdated kitchen or bathroom amenities – issues that recent data suggests are confined principally to flats.

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<sup>16</sup> Lloyd, T., Grayston, R., and Hudson, N. (2023). *Reboot: building a housing market that works for all*.

<sup>17</sup> English Housing Survey 2022 to 2023: housing quality and condition. Available [here](https://www.gov.uk/government/statistics/21english-housing-survey-2022-to-2023-housing-quality-and-condition/21english-housing-survey-2022-to-2023-housing-quality-and-condition).

We also know from our consultation that renters will under-report issues about their rented property, due to fears of negative consequences and repercussions.

Unfortunately, there are instances of landlords who do not fulfil their obligations and fail to keep their properties in a safe and decent condition. In a 2021 survey of 99 private renters, we found that 68% were satisfied with the service provided by their landlord.<sup>18</sup> This had decreased to only 49% in our 2024 consultation.<sup>19</sup> Of the private renters in our 2024 survey, 37% said they were unhappy with the quality of their housing.

Many of those private renters cited issues pertaining to poor conditions, or their landlords responding poorly to repairs. Some were reluctant to raise these issues with their landlords, in anticipation that they could be met with reprisals, such as increased rent or eviction notices.

Research shows that Black and ethnic minority renters are disproportionately faced with barriers that prevent them from securing a home in the sector, compared to White renters. In particular, renters of colour are more likely to encounter prejudicial barriers from landlords or agents if they; have children; are single parent households; and/or are in receipt of benefits. They are also disproportionately more likely to be asked to provide high levels of rent up front.<sup>20</sup> Renters of colour are 87% more likely to have experienced illegal acts by their landlord in the last year. These pressures perpetuate a broader under-reporting of issues which could result in reprisal such as eviction, and the resultant inequitable struggle to find a new home.<sup>21</sup>

Research shows that poor relationships with landlords can lead to feelings of powerlessness, stigma, financial stress, and anxiety.<sup>22</sup> With so many of the homes in our borough in the PRS, it is vital we respond effectively and swiftly to these problems with a comprehensive plan of action. The transparency achieved through annual landlord reporting, rent stabilisation, security of tenure, and a Landlord's Code of Conduct would undoubtedly help to smooth many of these fractious issues.

London wide data shows that nearly half of PRS homes (46%) had EPC ratings of "D", which could equate to as many as 14,000 homes in H&F. In autumn 2023, the then government scrapped its plans to introduce a national standard from 2025 that would require all PRS homes to hold an EPC C rating (or above) by 2028. The new government has signalled they will pursue a 2030 target for that aforementioned national standard, and although this is a huge national challenge and undertaking by the government, we fully support that ambition.<sup>23</sup> For many properties these upgrades could require structural alterations which could realise huge benefits to living standards.

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<sup>18</sup> Appendix 5, Survey of tenants in H&F PRS. Available [here](https://democracy.lbh.gov.uk/documents/s117609/PAC%20Report%2019%2020%20July%202021%20Private%20Sector%20Housin%20g.pdf).

<sup>19</sup> Note: Survey answers in 2021 did not include a "neither satisfied, nor dissatisfied" option.

<sup>20</sup> Shelter (December 2023). Racism in the private rented sector. Available [here](https://england.shelter.org.uk/what_we_do/updates_insights_and_impact/prejudice_in_practice_racism_in_the_private_rented_sector).

<sup>21</sup> Shelter (May 2024). The Fight for Home is a Fight Against Racism. Available [here](https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/the_fight_for_home_is_a_fight_against_racism#:~:text=Everyone%20deserves%20an%20affordable%2C%20decent.a%20roof%20over%20their%20head.).

<sup>22</sup> Harris, J. (2021). Health and wellbeing in the UK PRS.

<sup>23</sup> Property118. (July 2024) | Ed Miliband: Landlords must meet EPC C targets by 2030. Available [here](https://www.property118.com/news/ed-miliband-landlords-must-meet-epc-c-targets-by-2030).



In 2021, Fuel Poverty statistics showed that 11.3% of households in H&F were fuel poor, having both a low income and low EPC rating, with higher concentrations in the north of the borough. This further penalises private renters, with EPC E rated properties consuming 48% more gas than those properties with an EPC C rating.<sup>24</sup>

Decarbonising the PRS should start with raising the Minimum Energy Efficiency Standard (MEES) up to EPC C, meaning that landlords must ascertain this rating to be legitimately able to register and let out a property.

Unlike the social sector, private rented properties are not classified in terms of accessibility. This makes it difficult for Disabled people, who need accessible properties. With a fast-moving PRS market in London, where prospective renters will out-bid for properties, there are few incentives for landlords to prioritise renters based on issues such as accessibility, where further commitments to adaptation might be required.

This can compound an issue in which Disabled people will start from a disadvantaged financial baseline. Non-Disabled workers earn approximately 17% more than Disabled workers – with Disabled women this gap increases to 35% – whilst Disabled workers are over twice as likely to be unemployed as non-disabled workers<sup>25</sup>. Where the cost of social care is incurred, households with at least one Disabled person face costs of nearly £1,000 per month<sup>26</sup> – pricing many out of the PRS.

As the population ages, domestic adaptations will become increasingly necessary. A report by the Centre for Ageing Better observes that accessibility, adaptations, and maintenance are a problem across all housing sectors. It highlights: ‘We must prepare for the reality of an ageing population... by 2041, one in four people in England will be aged 65 or over... with the number of people aged 85 and over expected to double to 3.2 million by 2041’.<sup>27</sup> The vast majority of us would prefer to remain living independently as we age, and independent living forms a key pillar in our Adult Social Care approach, which is outlined in the H&F Plan (2023-2026).

## The high cost of renting

Our consultation showed that the primary issue of concern for private renters was the high cost of renting. Around three-quarters of private renters in our survey referenced the financial strain of renting in the borough. Some of the consequences of this include the view that private renters will be forced to leave the borough to rent elsewhere, or they may stay renting accommodation that is substandard to keep an affordable rate of rent.

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[Property118 | Ed Miliband: Landlords must meet EPC C targets by 2030 - Property118](#)

<sup>24</sup> Resolution Foundation (2022). *Shrinking footprints: The impacts of the net zero transition on households and consumption*. Available [here](#)

<https://economy2030.resolutionfoundation.org/wp-content/uploads/2022/03/Shrinking-footprints.pdf>

<sup>25</sup> TUC, (November 2022). Non-disabled workers paid 17% more than disabled peers. Available [here](#).

<https://www.tuc.org.uk/news/non-disabled-workers-paid-17-more-disabled-peers-tuc>

<sup>26</sup> H&F BI data, August 2024.

<sup>27</sup>The Good Home Enquiry, (2021). Available [here](#).

<https://ageing-better.org.uk/sites/default/files/2021-09/good-homes-for-all-a-proposal.pdf>

This pressure has intensified recently with rising rents and inflation. Figures indicate rental growth on newly let properties during 2023 peaked at 17% in inner London,<sup>28</sup> with the median monthly rent for a two-bedroom flat in H&F being £2,319 – the 4<sup>th</sup> highest in London.<sup>29</sup> This equates to nearly £28,000 a year – a prohibitively high figure for many households. Without rent stabilisation measures to bring levels back into line with resident’s wages, we face an unsustainable future for most people wanting to rent a home in the borough, and across London.

According to Trust for London, private renters of one-bedroom homes in H&F spend 53% of their income on housing, well above the London average (46%).<sup>30</sup> The practicalities of moving home are also very costly to private renters. More than half a billion pounds is spent annually on PRS rental moves in England, costing the average PRS renter around £670, according to the charity Shelter.<sup>31</sup> Those costs can include paying rent and bills on two homes simultaneously.

The challenge of affordability has been further exacerbated by the freezing of Local Housing Allowance (LHA) since March 2020 – the cap used by the previous government to calculate Housing Benefit for low-income residents renting from private landlords. LHA was finally unfrozen and increased to 30<sup>th</sup> percentile of local rents from April 2024. LHA will need to remain in step with living costs going forward if it is to remain an effective method of support to renters.

An increased demand for PRS homes in the borough means that some landlords, agents and intermediaries (such as sub-letting renters, or so-called rent-to-rent organisations) are able to get away with letting poorly maintained properties. Unfortunately, this supply and demand imbalance is particularly pronounced for people living on lower incomes, potentially encouraging some landlords operating at that end of the market to capitalise where people are less likely to complain.<sup>32</sup>

## Private renters in H&F

The English Housing Survey shows that the PRS has a much greater diversity of household types than in the past. The PRS is increasingly being relied on by those who require more than mere flexibility, but also affordability, stability and security, which can be challenging in the PRS. The growing sector means that more younger households, lone parents and single-person households are exposed to a lack of secure tenure, unaffordable housing costs and, consequently, are at risk of financial distress and homelessness.<sup>33</sup> Based on 2011 data, 92% of private renters are aged under 50.<sup>34</sup>

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<sup>28</sup> Hamptons (2024). Rental index data. Available [here](https://www.hamptons.co.uk/research/rental-index-data/)  
<https://www.hamptons.co.uk/research/rental-index-data/>

<sup>29</sup> H&F BI data, August 2024.

<sup>30</sup> Trust for London, (2023). London rent as a percentage of gross pay. Available [here](https://trustforlondon.org.uk/data/rent-affordability-borough/).  
<https://trustforlondon.org.uk/data/rent-affordability-borough/>

<sup>31</sup> Shelter, (April 2024). Unwanted moves cost renters more than half a billion pounds a year. Available [here](https://england.shelter.org.uk/media/press_release/unwanted_moves_cost_renters_more_than_half_a_billion_pounds_a_year_)  
[https://england.shelter.org.uk/media/press\\_release/unwanted\\_moves\\_cost\\_renters\\_more\\_than\\_half\\_a\\_billion\\_pounds\\_a\\_year\\_](https://england.shelter.org.uk/media/press_release/unwanted_moves_cost_renters_more_than_half_a_billion_pounds_a_year_)

<sup>32</sup> Shelter, (March 2014). Can't complain. Available [here](https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/report_cant_complain).  
[https://england.shelter.org.uk/professional\\_resources/policy\\_and\\_research/policy\\_library/report\\_cant\\_complain](https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/report_cant_complain)

<sup>33</sup> Lloyd, T., Grayston, R., and Hudson, N. (2023). *Reboot: building a housing market that works for all*.

<sup>34</sup> Data Viewer - Nomis - Official Census and Labour Market Statistics. Available [here](https://www.nomisweb.co.uk/).  
<https://www.nomisweb.co.uk/>

In H&F, White groups make up the majority of private renters (73%), which is slightly above the average across all tenures in the borough, at 68%. Asian households in the borough are also overrepresented in the PRS (12%) compared to the average across all tenures in the borough (10%). Conversely, Black, Black British and other Black groups are underrepresented in the PRS, making up 4% in PRS households, compared to 12% in all households across the borough. However, it is notable that, 30% of social rented households are accounted for by Black, Black British and other Black groups, representing the biggest proportional discrepancy between these two tenure types<sup>35</sup>

We also know that some Black, Asian and minority ethnic groups are overrepresented in overcrowded and poorly insulated homes,<sup>36</sup> and that Disabled residents and residents from overseas can face more challenges in accessing accommodation.<sup>37</sup> The 2022 English Housing Survey showed that of all groups in the PRS, it is struggling families (typically low-income lone parents) that suffer most with respect to overcrowding, damp and mould and affordability challenges, with singles most at risk of homelessness.<sup>38</sup>

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<sup>35</sup> H&F BI data (Nov 2024)

<sup>36</sup> Gulliver, K. (October 2017). Racial discrimination in UK housing has a long history and deep roots. Available [here](https://blogs.lse.ac.uk/politicsandpolicy/racial-discrimination-in-housing/).  
<https://blogs.lse.ac.uk/politicsandpolicy/racial-discrimination-in-housing/>

<sup>37</sup> Grant, S., Peel, CH. (2015). *“No Passport Equals No Home”: An independent evaluation of the ‘Right to Rent’*

<sup>38</sup> English Housing Survey 2022 to 2023: housing quality and condition. Available [here](https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition/english-housing-survey-2022-to-2023-housing-quality-and-condition).  
<https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition/english-housing-survey-2022-to-2023-housing-quality-and-condition>