

# LONDON ASSEMBLY

March 2026

## Housing Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into the implementation and monitoring of the measures in the Renters’ Rights Act in London.

Calls for Evidence are open to anyone to respond to. In December 2025, the Committee published a number of questions related to its investigation, which can be found on page 2. The Call for Evidence was open from 15 December to 6 February 2026.

### Contents

- Questions asked by the Committee ..... 2
- ACORN / Ref No. RR001 ..... 3
- Age UK London/ Ref No. RR002 ..... 7
- British Property Federation / Ref No. RR003 ..... 10
- BusinessLDN / Ref No. RR004 ..... 16
- Generation Rent / Ref No. RR005 ..... 19
- Inclusion London / Ref No. RR006 ..... 28
- London Citizens Advice / Ref No. RR007 ..... 38
- London Councils / Ref No. RR008 ..... 44
- National Residential Landlords Association / Ref No. RR009 ..... 50
- Propertymark / Ref No. RR010 ..... 59
- Race on the Agenda / Ref No. RR011 ..... 70
- Renters’ Reform Coalition / Ref No. RR012 ..... 80
- Safer Renting / Ref No. RR013 ..... 88
- TDS Charitable Foundation / Ref No. RR014 ..... 92
- Z2K / Ref No. RR015 ..... 108

# LONDON ASSEMBLY

March 2026

## Questions asked by the Committee

1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?
2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?
3. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?
4. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?
5. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?
6. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?
7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?
8. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?

## ACORN Submission to London Assembly Inquiry on Implementing and monitoring the Renters' Rights Act in London

<p>What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?</p>	<p>The Renters Rights Act being brought into law is a landmark moment for renters and a real victory for the housing movement and ACORN, who have been at the forefront of the fight for renters' rights for the past decade.</p> <p>This Act will finally do away with Section 21 evictions, the unfair mechanism landlords could use to evict a tenant for no reason, with just 2 months notice to leave. Not only was this a leading cause of homelessness, but it drove down standards of privately rented homes, with tenants scared to raise concerns for fear of a revenge eviction.</p> <p>Other key changes include outlawing bidding wars and demands for multiple months rent up front, giving more power to local authorities to crack down on bad landlords, and introducing higher legal standards and more avenues for tenants to complain, including expanding the Rent Repayment Order Scheme.</p> <p>What the Act doesn't address is affordability, which should now be the government's priority.</p> <p>Some of the key things to measure the success of the Act would be to monitor how many people are presenting as homeless. Also how many more people are reporting issues to the council would be an indicator of whether people feel more confident to raise issues now Section 21 has gone or if the threat of a rent rise is still putting them off.</p> <p>Other key indicators of the effects of the Act could be:</p> <ul style="list-style-type: none"> <li>- Reduction in evictions. Section 21 allowed landlords to evict tenants easily and without reason. It would also be sensible to keep data on illegal eviction attempts, and we anticipate stronger protections will result in an increase in illegal evictions.</li> <li>- Improved housing standards. Tenants having more power to challenge poor conditions can hopefully impact property conditions. So a way to measure property conditions would be useful.</li> <li>- Rent affordability/rent prices. Whilst this Act doesn't address affordability, better protection for renters could empower them to challenge rent increase more successfully.</li> <li>- Level of enforcement action taken by local authorities, including fines, prosecutions and Rent Repayment Orders.</li> </ul>
<p>What support do private renters need to help them benefit from the measures</p>	<p>Any increased awareness of their new rights would be useful. Information on council websites and councils promoting their rights are welcome. Support for renters groups such as ACORN would also help with this. We are trusted and could reach more people with more support and resources.</p>

<p>contained in the Renters' Rights Act?</p>	<p>Whilst awareness is useful, it is only meaningful if people have the means to enforce their rights. This means that councils need to actually use their enforcement powers, make it clear to tenants how they can get support from the council. Also being proactive with their enforcement and publicising successes will give tenants the confidence to raise things with their council.</p> <p>Again, renters unions are key, and promoting and supporting renters unions to empower renters to challenge their landlords will be key to the success of these new rights.</p>
<p>What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?</p>	<p>The main challenges for local authorities are making use of their enforcement powers. As it stands, councils across London are mostly failing to use their existing enforcement powers to tackle bad landlords, with many councils with no history of prosecuting landlords and many with very low rates of fines (eg, Croydon Council with 3 fines per 4,439 complaints between 2022-24). Any new enforcement powers are a waste of time unless councils actually use them.</p> <p>I would assume that all councils would require further funding, but there also needs to be the political will and culture change across councils to be proactive about enforcement rather than favour 'soft touch' approaches to bad landlords which we see often.</p> <p>We want to see councils across London take a zero tolerance approach to landlords, and use the full extent of their enforcement powers to crackdown on bad landlord behaviour and unsafe homes.</p> <p>The scope of the new landlord register and how much information it provides is important. It could be a useful tool for councils if it includes things like eviction notice details, safety and EPC certificates, and how much the tenants are paying. Councils should be pushing for the landlord register to include as much information as possible to support them to target their enforcement.</p>
<p>Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act? 7 MHCLG (2025), 'Guide to the Renters' Rights Act</p>	<p>From our experience it seems that lots of councils are under-resourced to deal with housing complaints. To use their improved enforcement powers local authorities will need to recruit and train more enforcement officers.</p> <p>We would like to see more money be made available to local councils in the form of an upfront cash injection rather than dribs and drabs. This would allow councils to be front footed in their recruitment and training of staff.</p> <p>We would like to see the Mayor lobby the government for further funding and as early as possible.</p>

<p>How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?</p>	<p>The RRA should help a lot as it gives councils more powers to tackle bad landlords, and renters more protection to assert their rights.</p> <p>However, as it stands PRS enforcement across London varies wildly from council to council and the Mayor needs an improved strategy to make sure the new powers in the RRA are successful.</p> <p>We are also very concerned about the lack of interest in tackling illegal evictions and landlord assaults from the Met Police. Despite the Mayor funding training for police officers, they refused to attend illegal evictions when we have called them, and we also have cases where they have failed to take action against landlords who have assaulted their tenants to force them to leave the property. We are anticipating a rise in illegal evictions and as it stands there is little to no protection for tenants from the police or local councils when illegal evictions take place. The Mayor will be aware of this as we raised these issues with the Deputy Mayor last year, However, we have not been made aware of any progress or policy changes.</p> <p>This Act also does not include measures to address affordability. We would like to see the Mayor push harder for rent control powers, and for much more investment in social housing.</p>
<p>How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?</p>	<p>We understand the Mayor's team offers training and support to enforcement officers which has had some success, and seems like this should be continued and expanded when possible.</p> <p>I'm sure local authorities would also benefit from any extra funding if it was available, and the Mayor could lobby the government for more funds.</p> <p>We would also like to see the Mayor put pressure on councils who are not taking action against bad landlords. It would be beneficial for the mayor to name and shame bad councils as well as bad landlords. Or have extra funding made available to councils who actually show good enforcement practices.</p>
<p>How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?</p>	<p>The best way would be to meet with renters groups and discuss this. We're keen to develop a good working partnership with the Mayor.</p> <p>The Mayor also made manifesto commitments to fund renters unions, and would be keen to work together to increase awareness of renters across London and also empower them to assert their rights.</p>

<p>What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?</p>	<p>We've not seen any evidence to prove that the Renters Rights Act will result in a lower supply of rental properties. Threats of landlords leaving the market have mostly been used as a pressure tactic by the landlord lobby. If rental properties are being freed up for owner-occupiers we view this as positive.</p> <p>We do however view the lack of affordable housing as the most pressing housing issue in the city, and this is not addressed in the RRA.</p> <p>We encourage the Mayor to work with us to lobby the government for rent control powers, as well as increased investment on social housing across the city.</p>
---	--

**Age UK London response to London Assembly Housing Committee call for evidence.**

**Implementing and monitoring the Renters' Rights Act in London**



**A summary on Age UK London's work on older private renters in London.**

In 2017 Age UK London published, '[Living in fear](#) – Experiences of older private renters in London, along with a [guide](#) for renters. From 2019 to 2021, Age UK London ran a '[Make renting in London age-friendly](#)' campaign, focusing on [conditions](#), the use of [selective licensing](#) and supporting older renters during the first Covid-19 pandemic [lockdown](#).

Previous research conducted by Age UK in 2017 has projected that the number of people over 65 living in private-rented accommodation in London could double between 2014 and 2039, with a central projection of 122,000 households by 2039 (Age UK, 2017) – some forecasts place this number higher. In London, the forecast proportion of older people (aged 65+) who will be renting privately by the end of the next decade varies greatly by borough from around 4% in Havering to nearly 25% in Westminster. Older renters are typically less likely to be transient compared with younger private renters. (Age UK, 2017).

---

**Investigation questions**

- **1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

Older private renters will benefit from greater security of tenure due to the abolition on Section 21 (s21).

Those reliant on a single fixed income such as the State Pension will be less able to react to increases in rent. Tenancy's becoming periodic should give some older private renters a greater sense of security, which can reduce anxiety linked to tenancy insecurity.

The abolition of s21 is likely to help reduce older homelessness by preventing a recurring cycle of homelessness arising from insecure shorthold assured tenancies.

Section 21 was one of the reasons why older renters (and renters of all ages) have historically been less vocal about poor and unacceptable conditions in the private rented sector, compared to the louder professional bodies representing landlords. Giving tenants a stronger voice in relation to their rights and entitlements as renters through the abolition of s21 will hopefully lead to improvements in the sector and will help to push out rogue landlords.

Part of improving standards in this sector relates to the ability of tenants to remedy complaints about poor and unsafe conditions – which 'no fault evictions' serve to undermine. The abolition of s21 resolves problems with the effectiveness of the 'retaliatory eviction' measures brought in by the Deregulation Act 2015. These were

overly complex, required engagement with under-resourced environmental health departments and still only guarantee six months additional security.

In [2021](#), 28% of London private renters over 50 lived in poverty and so a ban on *bidding wars* and limits on the frequency of rent increases will have some positive outcomes, but are unlikely to make the sector more affordable as a whole.

Greater rights in relation to the ownership of *pets* will have a significant impact older private renters who are more likely to live alone. Pets can have huge benefits to reduce social isolation.

A new *digital private rented sector (PRS) database* will help empower some older renters, but with greater levels of digital exclusion amongst older people, not everyone will be able to access this information unless alternative options are available.

The application of the "Decent Homes Standard" and "Awaab's Law" will hopefully reduce the risks to some renters posed by hazards such as mould and damp. Poor living conditions are a huge problem for older renters in London. In 2019 members of the House of Lords published a report which forecast that, in terms of quality of private rented accommodation, the number of older households (those containing at least one tenant over the age of 65) that are unfit and unsuitable could leap from about 56,000 to 236,500 by 2049 (national figures).

The proportionally higher numbers of private renters in London along with the increase in the number of older private renters and London's ageing housing stock will mean that a significant proportion of England's 'non-decent' private rented homes will be in the capital.

### Measuring success

Measuring the success of the Bill for older private renters in London should include a rise in enforcement statistics related to housing conditions and reductions in no-fault evictions for older Londoners. The views of renters should be at the heart of measuring success and local authorities should work with partners including polling bodies and academic researchers to enable the voices of more renters to be heard.

- **2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

More resources should be invested in awareness raising around rights and entitlements for renters. These campaigns should be simple and accessible to all renters including those that might struggle to access online tools such as rogue landlord/agent checkers or property license checkers.

- **7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

The Mayor should collaborate with partners on an inclusive renter's' rights awareness campaign.



# **LONDON ASSEMBLY HOUSING COMMITTEE**

IMPLEMENTING AND MONITORING THE  
RENTERS' RIGHTS ACT IN LONDON

**BRITISH PROPERTY FEDERATION EVIDENCE**

---

**PREPARED AND SUBMITTED BY**

Kate Butler  
British Property Federation



# IMPLEMENTING AND MONITORING THE RENTERS' RIGHTS ACT IN LONDON

## British Property Federation Evidence

### ABOUT THE BRITISH PROPERTY FEDERATION

From the homes we live in, to the spaces where we learn, work and relax, property is an essential part of modern life. The British Property Federation (BPF) represents the UK real estate sector, an industry that invests in communities across the UK, providing a wide range of high-quality homes, workplaces, health, education, and warehousing facilities that people and businesses rely on every day.

By building and managing more urgently needed homes, we are raising standards and choice across the industry, providing 2.7 million jobs - one in every 13 jobs in the UK - for people of all ages across a huge range of roles.

1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?

Many of the reforms the Renter's Rights Act (**Act**) seeks to implement are already commonplace within the Build to Rent (**BtR**) sector, such as long-term stewardship, professional, management, pet-friendly policies and consistent service. The Act will go a long way in improving the professionalisation of the Private Rented Sector (**PRS**) and improving the experience of renting.

While BtR landlords typically operate at scale and have professional management teams, the Act introduces additional administrative responsibilities. These include ensuring all units are registered in the PRS Database and through licensing regimes where in place, changing tenancy systems to adopt the periodic tenancy regime, maintaining audit-ready records of property standards compliance, and handling additional tenant churn.

A specific area of additional workload is in the s 13 rent increase appeal process. BtR landlords will need to:

- Track and document all rent reviews and notices served to tenants.
- Prepare detailed evidence to support any contested increases.
- Coordinate responses and potentially engage legal or property management teams to handle appeals efficiently.
- Plan for expected delays, which will impact investment returns.

Although corporate landlords may be better resourced than small-scale landlords, s 13 appeals and the broader reporting requirements represent a significant operational burden, particularly for large portfolios spanning multiple London boroughs.

For BtR landlords in London, success would mean well-staffed and resourced enforcement teams, timely processing of appeals, low numbers of contested cases, and consistent monitoring and enforcement across boroughs. To do this, transparency on the time taken to resolve s 13 appeals and backlogs is essential, to signify when the tribunal is overwhelmed and additional resourcing is needed. Tenants would experience clear, transparent rent-setting and dispute resolution, while landlords could manage portfolios predictably without excessive administrative burden.

## **2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

To ensure renters benefit fully from the Act, clear guidance and education will be essential. The Government is already providing much of this guidance to tenants and working with tenant groups to ensure it is fit for purpose and comprehensive.

Special attention should be given to groups less familiar with their rights, such as younger renters or first-time tenants. Partnerships with housing charities and local organisations could help provide practical advice on navigating tenancy agreements, understanding rent-setting, and using dispute resolution mechanisms responsibly.

## **3. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

Local authorities will need the capacity, expertise and digital infrastructure to manage large volumes of data efficiently, including landlord registration and property standards compliance. Without adequate staffing and streamlined processes, councils may struggle to respond promptly to complaints, and to monitor and enforce the Act, leading to delays for both tenants and landlords.

For the BtR sector, predictability and consistency are critical. Operators often manage multiple schemes across different boroughs, and variation in interpretation, documentation requirements or enforcement practices can create significant complexity and cost without improving tenant outcomes. A more effective approach would be risk-based and proportionate, recognising professional landlords with strong compliance records and focusing enforcement activity on areas of greatest risk or poor practice. This would allow councils to target limited resources where they have the greatest impact, while avoiding unintended consequences that could deter institutional investment or slow the delivery of new rental homes in London.

## **4. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

In our view, many London local authorities do not currently have the consistent capacity or resources required to monitor and enforce the measures introduced by the Act effectively.

Housing enforcement teams are often operating with constrained staffing, competing priorities, and limited digital infrastructure, which makes proactive inspection, data management and timely dispute resolution challenging across such a large and complex PRS.

These constraints risk leading to reactive or inconsistent enforcement approaches, with councils focusing on individual cases rather than adopting more strategic, system-based oversight. This can create unnecessary delays in processes such as registration or inspections, increasing administrative burdens for both landlords and tenants without improving outcomes. In particular, insufficient staffing or expertise may result in inconsistent interpretation of requirements across boroughs, creating uncertainty for operators managing portfolios at scale.

To ensure effective implementation, boroughs must receive additional resourcing and funding to digitalise systems to manage landlord registration, compliance reporting and appeals efficiently. A well-resourced, risk-based approach that recognises professional, compliant landlords, such as BtR operators with on-site management and established compliance processes, would enable councils to focus limited enforcement capacity on poor practice and higher-risk parts of the market. This would support better outcomes for tenants while maintaining investor confidence and the continued delivery of new rental homes in London.

#### 5. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?

The Act broadly aligns with the objectives of the Mayor's Private Rented Sector Partnership and his manifesto commitments to improve security, quality and fairness in London's private rented sector. Measures such as the abolition of no-fault evictions, the extension of the Decent Homes Standard and Awaab's Law to the PRS, and the introduction of a PRS Ombudsman and the PRS Database support efforts to raise standards, improve accountability and deliver safer homes for Londoners. In particular, centralisation of information through the PRS Database will support strategic coordination across London boroughs, and strengthened accountability and enforcement mechanisms in the Act reinforce the Partnership's commitment to focus on enforcement and standards.

However, the Act will also bring practical and operational challenges for boroughs and the Private Rented Sector Partnership. As we have noted throughout, effective delivery of the Act will depend heavily on local authority enforcement capacity, adequate understanding of the reforms and the changing role of local authorities, and sufficient resourcing to ensure consistent application across London's boroughs. Currently, across England and London there is a disparate approach to enforcement and monitoring of the PRS, with those tenants in local authorities with poor systems bearing the consequences. There is a risk that, without additional support – which has not been provided alongside these reforms – additional enforcement pressures could divert attention from existing partnership initiatives, or lead to further uneven outcomes across the city.

More broadly, while the Act supports the Mayor's ambitions on standards and tenant protections, we would emphasise the importance of balancing these objectives with measures that maintain confidence and investment in the sector. The challenges facing development in London are already well known – across the BtR sector, there was an [80% drop in starts in 2025 compared to 2024](#). Higher debt and construction costs, alongside regulatory pressures and delays at the Building Safety Regulator have particularly impacted housing delivery in London and the Mayor's target of 40,000 social homes. The increased compliance costs and regulatory complexity that the Act brings will further affect supply, though many of the unintended consequences of the Act on investment into the sector, which we discuss above, are avoidable. While they are primarily under the purview of the Government, the Mayor has a key role to play here in advocating change to mitigate these impacts. For example, the Government could introduce backdating of s 13 rent increases where a renter's appeal is unsuccessful, to ensure that responsible landlords, including those institutional investors that deliver high volumes of Build to Rent homes in London, can effectively plan income streams long-term.

**6. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

As we note above, a key concern for local authorities is resourcing. Many local authorities, including London boroughs, are struggling with financial and staffing capacity, and the Act imposes further responsibilities around monitoring and enforcement without accompanying resource provision. Ensuring that boroughs have a strong understanding of their responsibilities under the Act (including how these support the Mayor's manifesto commitments and PRS Partnership) and importantly have enough resource to carry out these responsibilities, is essential in avoiding uneven outcomes for tenants, as we discuss above.

**7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

The Act represents the largest change to the PRS in 30 years, and both tenants and landlords must understand the changes to effectively deliver the reforms.

The Government is already working with the sector and tenant groups to provide practical and comprehensive guidance, much of which is already available. Further dissemination of this through available channels, events, and advertising will be helpful here.

**8. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

The PRS is already incredibly constrained, and its supply-demand dynamics are worsening. As we found in our [Beyond Buy to Let](#) report last year, over 290,000 Buy to Let landlords have left the PRS since 2021 due to combination of tax changes and increasing debt costs. Surveys have found that a

further 31% of landlords plan to decrease their number of Buy to Let properties in the next two years, with many citing the Act as a key contributor to this due to the uncertainty it presents. Further changes to rental income taxation at the most recent Budget have increased the unattractiveness of the PRS for these landlords.

Against this backdrop, the only additional new supply of PRS homes is coming from the Build to Rent sector, which has delivered to date over 61,000 homes in London. However, development viability is very challenged, particularly in London. As we noted above, the number of Build to Rent homes started in London last year was only 613, down 80% on 2024. While the Act is not the sole cause of this, it provides further uncertainty and increases operational costs, some of which is entirely avoidable, as we referenced in responses to earlier questions. The Mayor has a key role here in advocating for sensible change to prevent investment deterrence.

**RESPONSE TO THE LONDON ASSEMBLY CALL FOR EVIDENCE:  
IMPLEMENTING AND MONITORING THE RENTERS' RIGHTS ACT IN LONDON**

**Response from:** BusinessLDN, One Oliver's Yard, 55–71 City Road, London EC1Y 1HQ

**Prepared by:** Stephanie Pollitt, Programme Director, Housing  
[REDACTED]

**Date submitted:** 6<sup>th</sup> February 2026

**INTRODUCTION**

1. BusinessLDN is a business membership organisation with the mission to make London the best city in the world to do business, working with and for the whole UK. BusinessLDN works with the support of the capital's major businesses in key sectors such as housing, planning and infrastructure.
2. We welcome the opportunity to respond to the London Assembly's call for evidence on the Renters' Rights Act in London. We have only answered a select number of questions, and our comments are primarily given from the perspective of how the Act will impact BtR landlords and their residents in London.
3. Build to rent (BtR) – high-quality, professionally managed homes – has seen steady growth across the UK and in London in recent years. Latest research shows that the total number of homes in the UK either completed, under construction, or in planning grew by 4% in Q3 2025 (298,074) compared with Q3 2024 (286,786). In London, the number of BtR homes either completed, under construction, or in planning currently stands at 112,824, which is an increase of 5% from Q3 last year (107,873). The continued growth of BtR is an important part in helping to increase overall housing supply in London and improve standards in the private rented sector (PRS).<sup>1</sup>

**CALL FOR EVIDENCE QUESTIONS**

**Q1: What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

4. For tenants in BtR, who already receive a high level of customer service and benefit from high-quality, energy-efficient homes, little will change. However, the introduction of open-ended periodic tenancies with no minimum term risks creating a transient rental population. The regulations may mean an increase in people using BtR homes as short-term lets by the back door, which has the potential to disrupt the experience of other tenants. In the case of BtR investors, uncertainty about how long tenants will stay could inhibit their ability to effectively manage their portfolios due to a potential increase in churn.

---

<sup>1</sup> [Build to Rent Q3](#), Savills, BPF, October 2025

5. BtR landlords generally make limited use of Section 21 notices, however, circumstances such as anti-social behaviour may require a BtR landlord to seek possession before a tenancy's natural end. The Act has set in place new mandatory grounds for possession using a Section 8 notice, but this is likely to create an increased reliance on the court system, which, as it currently stands, is insufficiently resourced to deal with a rise in possession orders. This could have a negative impact on existing tenants affected by anti-social behaviour.
6. If the concerns mentioned above become features of London's private rented sector, the cumulative impact of these changes is likely to disincentivise further investment into the BtR sector, which provides a variety of homes to meet the diverse needs of Londoners.

**Q3: What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

**Q4: Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

7. The main challenges for London boroughs will be resourcing and the level of expertise required to deal with complex enforcement cases. London had 134,000 non-decent private rented homes in 2022/23, accounting for 12% of the market.<sup>2</sup> The requirement through the Act to raise such homes to the Decent Homes Standard is welcome but will be costly and resource-intensive for boroughs to enforce.
8. Forecasts from London Councils predict that London boroughs will see a collective funding shortfall of £700m for 2025/26.<sup>3</sup> This does not take into account potential overspending and greater pressures on finances posed by homelessness and temporary accommodation. For boroughs to take on additional enforcement duties when they are already so stretched will exacerbate the challenges they already face. Whilst we welcome the Government's committed funding of £18.2 million in 2025/26, as well as the publication of guidance to help boroughs prepare for the Act, these measures must be implemented without delay in advance of the Act coming into force on 1 May 2026.

**Q6: How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

**Q7: How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

9. The professional and institutional nature of BtR landlords means they are likely to be aware of their responsibilities under the Act. For landlords less familiar with the obligations and for renters, guidance produced by the Government will outline the rights and duties of landlords and residents. The Mayor can support this through signposting to available resources and act as the key link between Central Government and the boroughs.

---

<sup>2</sup> [English Housing Survey](#), MHCLG, 17 July 2025.

<sup>3</sup> [London's housing crisis 'threatens to break borough budgets' amid £700m funding shortfall](#), London Councils, 12 September 2024.

**Q8: What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

10. Measures contained in the Act carry both increased administrative cost and investment risk. The main factor in increasing investment risk is the requirement for all rent reviews to follow the Section 13 process and the ability for all residents to appeal to the First-tier Tribunal (FTT). Whilst BtR landlords support the principle of being able to challenge unfair rents, the Act potentially incentivises residents to challenge even minimal increases simply to defer their implementation. This could result in the FTT becoming overwhelmed with cases leading to further delays and potentially loss of rent putting at risk the investment underwriting of new homes.
11. To prevent this, the Government should implement the backstop provision in the Act to allow the FTT to backdate rental increases to the date of the Section 13 notice at the earliest opportunity. This would remove the incentive to challenge reasonable increases simply to delay them and ensure that investment underwriting remains valid.

## Implementing and monitoring the Renters' Rights Act in London

### Generation Rent submission to London Assembly Housing Committee call for written evidence

Generation Rent is the voice of private renters across the UK. We campaign for every private renter to live in a secure, quality and affordable home. We believe that renting can, must and will get better.

This written submission is building on the oral evidence provided to the committee by our Chief Executive, Ben Twomey, on Tuesday 20<sup>th</sup> January 2026.

#### **1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

If the Renters' Rights Act does what it is supposed to do, then renters in London will have homes that provide stability in their lives, allow them to settle down if they want to, and help them thrive – rather than cause anxiety and ill-health, and drive inequality.

Section 21 evictions, a leading cause of homelessness, will finally be outlawed. In most cases, tenants who abide by their tenancy agreement can only be evicted if their landlord wants to sell, or move a family member or themselves into the property, and only after a minimum of 12 months. The notice period a landlord has to give tenants will double from two to four months. All of this means that we will have greater stability in our rented homes, and greater trust in dealings with our landlords, so we can plan our futures and complain if things go wrong.

Section 21 evictions are a leading cause of homelessness. Ending them will stop landlords evicting tenants in order to raise the rent or avoid carrying out repairs, so will reduce the number of families presenting as homeless. While landlords will still be able to evict tenants due to rent arrears or anti-social behaviour, the amount of rent arrears needed to trigger an eviction will be increasing from two to three months, giving renters more breathing space to try to settle debts before facing an eviction.

The reforms will also bring an end to fixed-term assured shorthold tenancies. With the new law, these will become a periodic tenancy which automatically renews every month until either the tenant provides a notice to quit, or a landlord conducts a valid and legal eviction. This change gives renters much more flexibility, meaning we can leave the property if our circumstances change or the home becomes unsuitable, anytime with two months' notice, while still having the new eviction protections mentioned above.

Under the new rules, landlords will have to issue a Section 13 notice to raise the rent, and will be limited to doing this once a year, giving renters two months' notice of the new rent. The scrapping of Section 21 evictions also reduces the risk of retaliatory evictions when renters choose to challenge rent rises.

Renters' existing powers to challenge rent hikes at the First-Tier Tribunal is strengthened, by postponing any eventual rent rise to the date of the tribunal's decision, and the rent set by the Tribunal can be no higher than the landlord's proposed rent. These changes remove significant

financial risks for renters in using the Tribunal, and should also encourage landlords to negotiate rather than impose rent increases, to reduce the likelihood of being taken to Tribunal.

The amount of rent in advance landlords can ask for will be limited to one month, reducing the upfront cost of renting. Bidding wars are also being banned. No longer will renters make an offer at the asking rent only to be pitted against someone else who has offered more. When advertising homes, landlords and agents must publish an asking rent and it will be illegal to accept offers above that rate. While this may not necessarily reduce rents that are charged, it will reduce the amount of renters' valuable time that is wasted in applying for tenancies they will never be able to afford. Moreover, blanket bans on tenants with children or those receiving benefits will finally be outlawed as discrimination.

This law will eventually apply the Decent Homes Standard (which sets minimum standards that homes must meet) and Awaab's Law (which sets strict timeframes for repairing dangerous hazards like damp and mould) to privately rented homes for the first time. However, the timeline for the Decent Homes Standard coming into force has recently been set as 2035. It is absurd to let landlords drag their feet for an entire decade, denying renters the most basic standards in our homes. It will mean millions of renters, including children, trapped living in poor quality homes with nowhere to turn. The timeline for Awaab's Law remains unconfirmed and we are awaiting a consultation on that.

Landlords will no longer be able to unreasonably refuse a pet in a privately rented home, while a new Private Rented Sector Ombudsman will provide a free, impartial and binding way to resolve disputes without the courts. In parallel, a landlord database is finally being introduced to give renters access to more information about their home and who they are renting from.

The Rent Repayment Order system is also being strengthened. A Rent Repayment Order requires repayment of rent by a landlord or letting agent who has committed a specific renting offence against the tenant. Under the current system, these are mostly used when landlords need a licence but do not have one, something that is more common for large shared houses. The new law adds six new offences which renters can claim rent payments back for, including misuse of eviction grounds, re-letting in the 12 months after using a sale or moving in ground, and continued non-compliance after being fined by the council. Renters will be able to claim back up to 24 months' rent (instead of the previous 12) and have two years to bring claims, while superior landlords and company directors will also be held liable, closing off loopholes some have been exploiting to avoid accountability.

The law itself is a generational change but its impact will only be felt in our homes if renters know their rights, councils are enforcing the law, and landlords that disregard the law aren't allowed to get away with it. It's therefore critical that councils are able to robustly enforce the new laws as soon as they come into force, using the increased civil penalties to demonstrate to landlords what happens if they try to ignore them.

The success of the Act will be seen in reduced homeless cases arising from the end of private tenancies, longer tenancies as recorded in the English Housing Survey, and fewer unwanted moves which may show up in Ministry of Justice court claims or deposit scheme data on tenancy turnover. The result of more renters having the confidence to exercise their rights should appear in higher numbers of market rent assessments and RRO applications taking place at the First-Tier Tribunal. We would also expect to see more councils reporting enforcement activity as a sign that quality of homes is improving. The number of landlords and

properties registered with the database and ombudsman will be an important figure to monitor once those institutions are set up.

## **2. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

The two key challenges are empowering renters to be aware of our rights and confident in asserting them, while robustly enforcing the law as a priority. These challenges must be addressed together, and will be greater than the sum of their parts if addressed effectively.

Polling that Generation Rent commissioned with Opinium in April 2025 found that 2 in 5 (39%) renters in London said they would not be confident in taking action against their landlord due to disrepair or concerns over illegal behaviour. The sample size was 347 people. In reality, those renters are right not to feel confident. Councils are the most important enforcement body but they simply don't have the resources they need to enforce effectively, which right now is leaving landlords across the country not fulfilling their obligations, and renters living in awful conditions that impact their physical and mental health.

While many landlords will educate themselves on the new regulations and seek to abide by them, others will be watching keenly to see what they can get away with after 1<sup>st</sup> May 2026. We are already hearing tales of letting agents, not necessarily in London, trying to pull the wool over renters' eyes. A recent example was the demanding of a 'statement of intent' from prospective tenants to commit to remaining in the property for 12 months with no break clause. This statement has no legal basis, but it does effectively trick renters into thinking that they do not have the flexibility in their home that the new law provides. It could even put renters off from taking a tenancy just because they can't commit to that period.

Councils will have many other enforcement duties under the Act, but there are some offences under the Act that renters will be better placed than councils to identify – the question is whether renters will check and report. This intelligence arising from tenant reports will be crucial for councils enforcing the Act more widely.

Simon Mullings, a brilliant housing lawyer at the Hammersmith and Fulham Law Centre who sadly passed away just over a year ago, used to talk about an "army of tenants" who, with the right support, would be able to spot where things have gone wrong and be incentivised to bring their landlord to justice if needed. Rent Repayment Orders are central to this, as the ability for renters to get some of their rent back is a strong reason to not tolerate any more bad behaviour. New offences under the Renters' Rights Act include if a landlord provides false or misleading information to the new Private Rented Sector Database, or if they breach the no re-let period after claiming to be evicting in order to sell or move in. Renters could be crucial in monitoring these areas, but will only do so in large numbers if incentivised to check because of a widely-known connection to Rent Repayment Orders.

It will therefore be important that councils do as much as they can to encourage and facilitate tenants to check for non-compliance, and do what they can to maximise the tenant's chance at getting compensated. Otherwise the deterrent effect will be very weak.

### **3. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

A new law without enforcement to back it up is just empty words. Early council enforcement will help have a deterrent effect against unlawful practice, as will Rent Repayment Orders if renters are aware of them and supported to pursue them.

The UK Government in November 2025 announced £18 million in “burdens funding” to help councils prepare for enforcing the Renters' Rights Act. But councils have already stated that this doesn't go far enough, and that they need sustained and predictable funding to make the reforms work.

To understand what the current absence of enforcement can look like in London, we have been given permission to share Sarah's recent experience. Sarah rented a flat in Croydon for around a decade, leaving in March last year. She is a retired and receiving disability benefits after having a stroke. She said the flat she was privately renting had 96 points of disrepair. She constantly raised the issue with Croydon Council, who she says “did nothing” despite her supplying lots of evidence of the issues she was facing.

This experience is all too familiar in Croydon. From 2022 to 2025, the Guardian found that Croydon council received 4,461 tenant complaints. These are thousands of people potentially in a similar situation to Sarah. But during that time the council did not prosecute a single landlord. It issued only three civil penalty notices, all of which were in 2022 and nothing since.

This is a council area that includes part of the Secretary of State for Housing's parliamentary constituency. Neighbouring Lambeth, which includes the other part of that constituency, also reported just three enforcement actions in the last three years, despite handling 3,207 complaints.

To zoom out to all London Boroughs, the GLA's Rogue Landlord Checker is leading the way in the country for showing where renters can look up landlords to see records over the last three years of any fines, prosecutions, revoked licenses or even banning orders in their area.

Having viewed the Rogue Landlord Checker on Friday 16<sup>th</sup> January 2026, it is clear that enforcement is not widespread, it is not a reliable tool for renters to use, and its existence is monitoring some activity by councils but not necessarily promoting more.

The earliest enforcement dates on the Checker were from 2019, implying there could be almost seven years of data available (the GDPR policy says records will be removed after ten years), and yet the information available is inconsistent. This could be because it is not mandatory for local councils to update the Checker, and also presumably because enforcement actions are so infrequent that there is little to report.

14 of the 32 London boroughs are not even listed on the Checker, because they are not sharing a single successful formal enforcement outcome. These are Barnet, Bexley, Bromley, Croydon, Greenwich, Hackney, Hammersmith and Fulham, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Merton and Sutton. Some of these councils may claim not to use the Checker, but levels of enforcement are made more pronounced by the statistics reported by those that are using the Checker.

Four London councils recorded only one enforcement action. These were Haringey, Islington, Lambeth and Richmond upon Thames. Then we begin to see slight increases from Lewisham (3), Wandsworth (4), Tower Hamlets (6), Ealing (8), Southwark (12), Kensington and Chelsea (15), Havering (15), Newham (18), Barking and Dagenham (18), Enfield (20) and Westminster (22). The most active enforcers according to the Checker are Camden (42), Redbridge (52) and Waltham Forest (65).

To give context to these figures, we can choose any type of offence that does appear on the Checker. For example, enforcement against illegal evictions should be included. The housing charity Safer Renting found that almost 9,000 cases involving illegal evictions across England were logged in 2022, and they claimed that less than 1% of cases resulted in any enforcement action. On the Rogue Landlord Checker, only one conviction of a landlord has ever been recorded for illegally evicting their tenant.

The UK Government are in the process of implementing a new mandatory collection of private rented sector enforcement data from local housing authorities, which will include the number of full-time equivalent staff responsible for enforcement in the private rented sector. The GLA and Mayor should work with them to strengthen and expand how the Rogue Landlord Checker works in this context.

#### **4. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

The Mayor of London's manifesto promised to "support renters to take dodgy landlords to tribunals to get up to 24 months of rent refunded". The GLA's Property Licence Checker, launched in 2020, is useful to allow renters to find out if they might be owed a Rent Repayment Order because their property should have a licence but does not.

However, there remains a great deal of non-compliance. In 2024, local authorities estimated there were a total of 146,600 Houses in Multiple Occupation (HMOs) in London, of which 31,066 were mandatory licensable properties (i.e. HMOs with more than 5 people). According to the GLA Housing in London 2025 report, the number of HMOs actually holding a mandatory licence in 2024 was 19,896 – less than two thirds of those that should legally have a mandatory licence. The Property Licence Checker could help renters to pursue their rent to be returned to them, including the tenants of 11,000 large HMOs without a licence, but it has not yet achieved a tipping point of awareness among renters and deterrence for landlords, and so would benefit from further promotion, and ideally integration with councils' licensing registers.

The Mayor's manifesto also promised to "end rough sleeping for good by 2030". Section 21 evictions are a leading cause of homelessness, so ending them with the Renters' Rights Act could begin to turn the tide for the more than 90,000 children living in temporary accommodation right now in London, and contribute towards the goal to end rough sleeping.

The Mayor also pledged in his manifesto to "back renters to defend their rights, with advice and guidance, including funding for groups such as renters' unions". It appears that such funding has not yet materialised. With 2026 ushering in the biggest changes to renting in a generation,

renters groups would be very grateful if such support could be made available as soon as possible. This could support efforts such as the development of resources and events to raise awareness among renters of new rights and protections under the Renters' Rights Act.

A wider point to make is about a gap in the Renters' Rights Act, in that it does not meaningfully address the soaring cost of renting, which is the primary concern for renters. The Mayor has been on the record for a number of years now wanting powers to be devolved so that he can take action to limit rent rises in London. However in September last year, the Housing Minister said in Parliament that the Government had not received direct representations from the Mayor in respect to rent controls, and that they have not discussed their introduction at a local level. We think it is long overdue that the Mayor started making those representations on behalf of London's renters.

Limiting rent rises is essential to making housing affordable, secure and fair. By stopping unaffordable rent hikes, regulation would give renters more stability, reduce poverty, and allow people to keep more of their income for living, not just surviving. Lower rents strengthen communities, reduce homelessness, and give tenants the confidence to demand safe, decent homes without fear of retaliation. Rent control also shifts power away from landlords, ensuring wage rises benefit workers rather than being swallowed by rent, and helps prevent displacement through gentrification.

Rent regulation is in force across much of Western Europe. The exact nature of the regulation varies a great deal, but two main types are limits on rent increases within tenancies (found in Germany, France and Switzerland) and limits on rent increases between tenancies (such as Denmark, Sweden and Austria). A recent report by the Swedish Union of Tenants (available in Swedish [here](#) but English translation available) examined outcomes in each of these countries to understand how well-founded common objections to rent regulation were.

In terms of "supply" of homes, this could mean several things: the size of the private rented sector, the number of homes built in relation to the population, and how easy it is to move to another rented home. The report found no relationship between the existence of rent regulation and a reduction in supply across these definitions:

- Germany and Switzerland have proportionately larger private renter populations than the rest of the countries examined (2023).
- France, Switzerland and Austria had building rates around twice that of England in 1991-2021.
- Renters in Sweden, Denmark and Switzerland were more likely than renters in the UK to have moved home in the previous five years according to a 2012 study.

##### **5. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

The Mayor and GLA should expand the Property Licence Checker to support tenants understanding new offences that will be eligible for Rent Repayment Orders, as explored above. Councils will have different individual approaches, and the GLA could provide either a convening role on this, or a backstop for renters whose council support is lacking.

We also think the Mayor should create a legal fighting fund to support local authorities. Councils tend to be risk averse when it comes to taking on bad landlords. A collective legal fighting fund for councils in London could help overcome timidity, particularly where a criminal landlord is operating across council borders. It requires a lot of money up front to build up a self-sustaining enforcement mechanism, which the government envisions for councils through the use of larger fines. However the advantages of early resourcing are significant in protecting renters, bringing the worst offenders to justice, communicating action for a deterrent effect, and bringing money back into enforcement efforts. Early robust enforcement would therefore be the best deterrent against future unlawful behaviour.

This enforcement will not be perfect right away. As we have already discussed, its low level of activity and capacity is the starting point. Therefore, the Mayor and GLA should be monitoring enforcement to enable continuing improvement and the sharing of best practice. Councils should have to justify inactivity not only to the UK Government, but to local leaders and residents alike. The success of the legislation should be monitored in terms of how it is impacting the lives of private renters in London. Where it is not having the desired impact, that will likely be the result of a failure in enforcement or awareness-raising rather than in the law itself.

## **6. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

One opportunity for London is that there are so many renters and the Mayor knows where they are concentrated, so will be able to use local physical advertising to reach them. Similarly the Transport for London (TfL) network is something a majority of renters will use so that is an opportunity for the GLA to reach them with materials, particularly tailored to a London audience, and pointing to further resources. Meanwhile, local councils should also be encouraged to consider their own public spaces such as libraries or newsletters.

Generation Rent would be very happy to advise on those materials, or for our own rights-awareness resources to be promoted or used. It will be important to get the right information to renters at the right time to minimise the potential for confusion, i.e. the risk that a renter believes that a section 21 is invalid before the ban comes into force. Over the next couple of months, renters will have questions about the status of their fixed term and what that means for their risk of being served notice..

Generation Rent is also looking to amplify these messages in the build up to our annual Renters' Rights Awareness Week, which this year we will be holding from 27<sup>th</sup> April to 3<sup>rd</sup> May 2026 to cover the Act's implementation date. We will be doing webinars, attending events, and producing as many resources as possible for as many stakeholders and partners as possible to reach renters. We are already discussing this with the GLA and have invited every local council to take part, but any promotion or coordination with the Mayor would be helpful.

Renters often depend on information from their landlords or letting agents alone, leaving them vulnerable to misinformation or withheld rights from particularly unscrupulous housing providers. The Mayor should consider how their online tools can be further promoted, or how the "new deal for renters" promised in their manifesto might include ways in which renters can access good independent information and legal support.

The new law introduces changes to the First Tier Tribunal in order to challenge rent increases that are above the market rent. Tribunal is a daunting word, so there is an obstacle to giving renters the confidence that it is worth at least considering an application to. Polling we did with Opinium last year found that just 9% of London's renters reported knowing a lot about the First-Tier Tribunal, while 64% said they have never heard of it. On the government's roadmap for implementing the Renters' Rights Act, they have said they are exploring introducing fees for renters to access the Tribunal. There is not currently a fee for challenging a rent increase, so any support from the Mayor or GLA in resisting this new barrier to justice would be very welcome.

A small note on purdah (the pre-election period) is that most of the Renters' Rights Act comes into force on 1<sup>st</sup> May 2026, which is just six days before local elections. We would urge everyone to not treat rights awareness as a political issue. The Mayor, the GLA and every council should be pulling out all the stops around 1<sup>st</sup> May to make people aware of their rights.

## **7. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

We do not anticipate a long term impact by the Renters' Rights Act on the supply of rented homes. When homes are sold by landlords they do not fall into the ground, but instead are often bought by other landlords or allow renters to become first time buyers, directly or via a chain. This does not take away from the fact that not enough homes have been built in recent decades however. We need more homes to be built, particularly social homes, but this is outside of the scope of the Renters' Rights Act. If politicians are interested in reviving home ownership then they must accept that this will involve the private rented sector getting smaller as a proportion of tenure types.

When Wales ended Section 21 in December 2022, there did seem to be a short-term spike in those evictions in the six months leading to the changes coming in. This means that if there is going to be a spike in England, we might see an uptick in the 12th February data release. The transition in Wales happened when rents were rising there at 12% so many landlords would likely have been evicting in order to re-let for a higher rent.

Renters could be supported through this with use of discretionary housing payments, which are coming to an end, or the new crisis resilience fund which replaces them, to protect renters from being driven into homelessness, poverty or debt because of the cost of an unwanted move. It is also important to note that not every Section 21 is valid, for example if the landlord hasn't protected the deposit properly or hasn't provided a valid gas safety or energy performance certificate. This means good rights awareness and access to legal advice would still enable some tenants to challenge those evictions leading up to 1<sup>st</sup> May.

Notably, if this does happen it will be a short term challenge that ought to be followed by a new and better system. The number of private renter evictions in Wales over the past 24 months has fallen compared with the 24 months before covid by 9% - rent arrears evictions have gone up 14% as the cost of living crisis continued but no-fault evictions are down 35%. In the same period England saw increases of about 25% and 50% for the equivalent eviction types respectively.

There is also no indication that county court eviction cases will take longer – Section 8 eviction grounds already make up nearly half of the landlord possession caseload, and the time taken

between claim and possession is very similar between Section 21 evictions and other types, at a median of about six months.

# Implementing and monitoring the Renters' Rights Act in London – Inclusion London Response

Inclusion London is a pan-London disability equality organisation, run by and for Disabled people. We work to promote equality and inclusion of Deaf and Disabled people in the capital. We support over 70 Deaf and Disabled People's Organisations (DDPOs) in London and through those organisations our reach extends to 70,000 Disabled people.



## **1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

The Renters' Rights Act introduces a package of long-awaited reforms to the private rented sector and represents an important step towards rebalancing the power relationship between landlords and tenants. Inclusion London welcomes many of the measures contained in the Act, including the abolition of section 21 "no-fault" evictions, the move from fixed-term to periodic tenancies, and new protections against rental discrimination. Taken together, these changes have the potential to improve security and stability for private renters and to make homes safer places to live.

The Act also introduces new safety measures which are intended to raise standards across the sector by extending the Decent Homes Standard to the private rented sector and strengthening requirements to address damp and mould through the application of Awaab's Law. If these measures were effectively implemented and enforced, they could make a huge difference to millions of renters who are currently living in poor-quality and unsuitable housing conditions.

These reforms have the potential to improve the housing conditions of thousands and thousands of Deaf and Disabled people, who make up a significant proportion of private renters across the country. Of the 4.7 million households in the private rented sector across England, around a third, approximately 1.4 million, are Disabled households.<sup>1</sup> While Deaf and Disabled people have historically been over-represented in social housing sectors, many are currently living in the private rented sector as a result of the chronic shortage of accessible social rent housing. Over the last five years, the proportion of Disabled households living in the private rented sector has in fact significantly increased, from 25% in 2019/2020 to 31% in 2024/25.<sup>2</sup>

---

<sup>1</sup> UK Government (2025) English Housing Survey 2024 to 2025: headline findings on demographics and household resilience. Available at: [English Housing Survey 2024 to 2025: headline findings on demographics and household resilience - GOV.UK](#)

<sup>2</sup> UK Government (2025) English Housing Survey 2024 to 2025: headline findings on demographics and household resilience – Chapter 1: Profile of households and dwellings. Available at: [Chapter 1: Profile of households and dwellings - GOV.UK](#)

Evidence from recent English Housing Survey data shows that Disabled households renting privately are significantly more likely to live in non-decent homes than non-disabled households (26% compared to 19%) and are also far more likely to experience damp problems (16% compared to 6%).<sup>3</sup> This makes it particularly important to assess whether the Act delivers meaningful improvements in housing conditions for Deaf and Disabled renters.

While many of the measures introduced by the Act are likely to benefit Disabled tenants, we believe there are still significant gaps in the legislation that risk leaving Deaf and Disabled renters without the protections they need to secure safe, affordable and accessible homes.

Many Disabled private renters in London are likely to remain trapped in inaccessible homes after the Act comes into force in May. The legislation contains no measures to improve the accessibility of private rented properties or to increase uptake of the Disabled Facilities Grant across the sector. As a result, many Disabled renters will continue to live without the adaptations they need to use basic facilities in their homes and live independently.

At the same time, Disabled people, who are disproportionately affected by rising rents due to lower-than-average incomes and additional disability-related costs, are likely to continue experiencing significant rent increases, as the Act does little to address affordability in the sector and nothing to tackle soaring rents.

This submission considers how the measures introduced by the Renters' Rights Act are likely to change the experience of Deaf and Disabled people renting privately in London, as well as the implications these might have for landlords. It highlights the aspects of the Act that are likely to benefit Disabled tenants as well as key gaps and loopholes in the legislation that will impact Disabled people.

## **Positive aspects of the Renters' Rights Act and implications for Disabled tenants**

### **The end to Section 21 Evictions**

The move to outlaw arbitrary Section 21 evictions will give greater security and stability to Disabled private renters. Outside of rent arrears and anti-social behaviour, landlords will only be able to evict if they want to sell, move into, or move a family member into the home.

Tenants are likely to move home less frequently, stay in their homes for longer and are therefore more likely to be able to put down roots in their communities. This stability is particularly important for Disabled renters, many of whom face significant challenges in finding private rented homes that meet their needs and accessing local healthcare and social care support services.

Our latest housing research has shown how no-fault Section 21 evictions affect Disabled private renters, both physically and financially, with many renters reporting having to move home frequently due to evictions. They described moving as extremely challenging, particularly when it involves transporting expensive specialist equipment, and shared that frequent moves make it difficult to access and maintain healthcare treatments and social care support services that are

---

<sup>3</sup> UK Government (2024) English Housing Survey 2022 to 2023: housing quality and condition. Available at: [English Housing Survey 2022 to 2023: housing quality and condition - GOV.UK](https://www.gov.uk/government/statistics/english-housing-survey-2022-to-2023-housing-quality-and-condition)

only available in specific London boroughs. Moving between London boroughs is particularly difficult for Disabled people with care packages or ongoing health needs because social care support is commissioned and administered locally. Care packages do not automatically transfer across borough boundaries, meaning people are often required to undergo a full reassessment by the new local authority, with no guarantee that existing levels of support will be maintained. Reassessments can be lengthy, eligibility thresholds vary between boroughs, and interim support may be inadequate, exacerbating existing impairments and health conditions.

### **Case Study**

Abbi, a young Disabled person who is a wheelchair user and hard of hearing, shared with us the impact a Section 21 eviction had on her physical and mental health, as well as the difficulty she had in finding a new accessible property once she was evicted from her home.

*“In 2018, I was living with 2 friends in a fully accessible flat in Bermondsey when we were served a Section 21 no-fault eviction. At that time, the only accessible three-bedroom property on the private market within our price range was in Kent. While the three of us spent 3 months frantically trying to find somewhere to live, my mental health deteriorated significantly. I could see that my two non-disabled flatmates could easily have found a nicer flat for less money, if only they weren’t living with me. I started to believe that if it was so hard to find somewhere to live, maybe I wasn’t supposed to live at all. I was nearly hospitalised, which almost came as a relief, because at least then I’d have somewhere to stay.*

*Eventually, my flatmates found a flat with just one step to get in, which I could wheelie my wheelchair up to get inside. I didn’t dare ask for a ramp to be installed, because I was terrified of being evicted again.*

*The new flat was in a different London borough, which meant that all my healthcare had to be moved to a different NHS trust. The flat was expensive and riddled with mould. The heating didn’t work, and in winter the temperature was consistently below 14 degrees. My wheelchair didn’t fit through the bathroom doorway. The three nearest tube stations were all inaccessible. During lockdown, the building site beside our flat became a car park for hearses. We lived in that flat for two years”.*

Our research has found that, in much the same way as they feel about asking for repairs, many Disabled private renters are reluctant to ask their landlords for housing adaptations they need in their homes where it might make them look like a ‘problem tenant’.<sup>4</sup> Some tenants described to us instances where Section 21 evictions were used by landlords as a retaliatory measure to push them out of their homes out after requesting adaptations, as their requests for reasonable adjustments were treated as complaints.

We believe the abolition of Section 21 evictions has the potential to improve security of tenure for Deaf and Disabled private renters and reduce the fear of retaliatory eviction when requesting adaptations or asserting their rights, but the effect of these reforms remain to be seen.

---

<sup>4</sup> Inclusion London (2025) Barriers at Home: Deaf and Disabled people’s experiences of the private rented sector in London. Available at: [Barriers at Home: Housing crisis for Deaf and Disabled Londoners - Inclusion London](#)

## **Move to Periodic Tenancies**

We strongly support the decision to bring an end to fixed-term assured shorthold tenancies and the move towards periodic tenancies. This change gives greater flexibility to Disabled tenants, allowing them to leave properties anytime with two' months notice, and reduces barriers to accessing housing adaptations. As the Equality and Human Rights Commission (EHRC) has highlighted, short-term tenancies act as a disincentive to installing adaptations, because the landlord must agree and the tenant must commit to living in the property as their main residence for a minimum of three years. As one Disabled renter explained:

*“Most of my home is currently wheelchair-accessible, but I cannot access any bathing facilities as it is a shower over a bath, and my landlord refused to allow me to sign a five-year lease, which meant that I could not have a Disabled Facilities Grant to transform it into an accessible wet room.”<sup>5</sup>*

In principle, the shift to periodic tenancies may incentivise landlords to approve and install adaptations in their homes. However, the extent to which these changes may materialise in practice will largely depend on a number of other factors, including landlords' awareness of their obligations under the Equality Act 2010, their knowledge of the Disabled Facilities Grant, as well as renters' awareness and ability to exercise their rights.

## **Ban on Rental Discrimination**

We welcome the outlawing of “No DSS” policies, which will make it illegal to impose blanket bans on renting to people in receipt of benefits or families with children. This means it will be illegal for landlords to refuse tenants because they are in receipt of benefits. This measure has the potential to benefit Deaf and Disabled renters in particular, who are more likely to rely on social security and have long been subject to discriminatory practices within the private rented sector.

However, it is unclear how this ban will be enforced in practice. Many Deaf and Disabled people have told us that they are reluctant to disclose their impairment during property searches or viewings, fearing that doing so may disadvantage them or lead to discrimination. Some have shared experiences of being refused properties or being treated less favourably by landlords and estate agents because they felt landlords assumed Disabled tenants might require costly adaptations or may not be able to afford the rent due to the source of their income. In fast-paced rental markets such as London where there are often multiple applicants per property, it is extremely difficult to know or prove that an application was rejected because someone is in receipt of benefits or is Disabled. Therefore, whilst we welcome the outlawing of “No DSS” blanket bans, it will be crucial that this is effectively enforced so that Deaf and Disabled renters are not excluded through more subtle or indirect forms of discrimination.

## **Decent Homes Standard and Awaab's Law**

We also welcome the expansion of the Decent Homes Standard and Awaab's Law to the private rented sector. Applying stronger requirements on disrepair and introducing clear timeframes for addressing hazards in people's homes is an important step towards improving housing conditions of private renters.

---

<sup>5</sup> Equality and Human Rights Commission (2018) Housing and disabled people: Britain's hidden crisis. Available at: [Housing and disabled people: Britain's hidden crisis | EHRC](#)

However, we are extremely concerned and disappointed that the Decent Home Standard will only be applied to the private rented sector from 2035. This decision is particularly concerning because more than 1 in 5 private rented homes in England are currently ‘non-decent’, according to the English Housing Survey.<sup>6</sup>

Delaying the extension of this standard to private rented homes will mean millions of renters will continue to remain trapped in poor quality homes. Denying basic quality standards to private renters for almost another decade will mean condemning renters to living in homes that are unsafe and dangerous to their health, disproportionately impacting Deaf and Disabled people.

For Deaf and Disabled people, dealing with disrepair in rented housing is particularly problematic, as poor housing conditions can have serious and disproportionate impacts on health and independence. For example, boilers breaking down or broken windows causing the home to be very cold can severely affect people who need to regulate their body temperature due to their impairments. Damp and mould are also especially dangerous for Disabled people with respiratory conditions or weakened immune systems, and prolonged exposure can exacerbate existing health conditions.

However, Disabled renters also face additional barriers in reporting disrepair including communication barriers and a lack of reasonable adjustments. Deaf and Disabled tenants may need reasonable adjustments so they are able to report disrepair such as communication in British Sign Language, which is not often provided. As a result, disrepair can persist for long periods, worsening health inequalities for Disabled private renters.

It is therefore important that information about new rights under the Decent Homes Standard and Awaab’s law is communicated to Disabled people in a range of formats including BSL, Easy Read, Braille, and a range of other formats to ensure they have the same opportunity to exercise their rights and request repairs. While extending these protections to the private rented sector is a welcome step, their effectiveness will depend on robust enforcement and on Deaf and Disabled renters being adequately supported to raise concerns and access timely repairs.

## **Unaddressed issues in the Act**

### **The lack of protections against rent increases and the impact on Disabled people**

The Renters’ Rights Act introduces some limits to rent increases, including by restricting landlords to one increase per year under Section 13, requiring a minimum of two months’ notice, and giving renters the right to challenge rent hikes at the First Tier Tribunal. While these measures are steps in the right direction, they fall far short of what is needed to tackle the affordability crisis in the private rented sector. The Act does not provide any meaningful protections against unaffordable rent increases that are forcing tenants out of their homes.

Rents in the private rented sector have been sky-rocketing for decades, disproportionately impacting Deaf and Disabled renters, who are more likely to have lower than average incomes and face additional disability-related costs. Scope’s latest Disability Price Tag research shows

---

<sup>6</sup> UK Government (2025) English Housing Survey 2023 to 2024: headline findings on housing quality and energy efficiency – Chapter 1: Housing quality. Available at: [English Housing Survey 2023 to 2024: drivers and impacts of housing quality - GOV.UK](#)

that Disabled households need on average, an additional £1,095 a month to have the same standard of living as non-disabled households.<sup>7</sup>

As one Disabled private renter we interviewed explained: *“If I’ve had like a bad time with my health, affording my rent becomes harder... the moment something goes wrong with my wheelchair, oh that’s a thousand pounds. The moment something goes wrong with my health, and it can’t be done on the NHS, oh that’s infinite amounts of money. The increase in electricity bills that just comes with being Disabled because you have to charge lots of devices and hot water bottles and heating pads.”*<sup>8</sup>

While the Act allows tenants to challenge rent increases at the First Tier Tribunal, it fails to recognise that many Disabled tenants, particularly people with learning difficulties, might face barriers in accessing the Tribunal process without appropriate advice and support in place. In addition, the Act does not regulate rent levels or limit the size of rent increases. Although the new law guarantees that where a tenant challenges a rent increase at tribunal the rent cannot be set above the open market rate, this offers little protection in London where local market rents are already unaffordable for many Disabled renters. In practice, unaffordable rent increases can operate as a form of retaliatory eviction. Even with the abolition of Section 21, landlords may still be able to push tenants out of their homes by increasing rent beyond what they can afford, particularly following requests for repairs or adaptations. As a result, Deaf and Disabled renters may continue to feel unable to assert their rights for fear of being priced out of their home. The Act does not provide sufficient safeguards against this risk, or a limit on the amount landlords can increase the rent by.

Research from the New Economics Foundation has shown that rent controls could play an important role in reducing poverty and improving affordability in the sector, producing wider benefits to the economy.<sup>9</sup> Without the introduction of rent controls, this new law will not adequately address the affordability crisis in the private rented sector or deliver meaningful security for Deaf and Disabled renters.

### **The lack of a legal duty to provide adaptations: a missed opportunity**

The Act contains no measures to improve the accessibility of private rented properties or to increase uptake of the Disabled Facilities Grant across the sector. As a result, we are concerned that many Disabled renters will continue to live without the adaptations they need to use basic facilities in their homes and live independently.

Many Deaf and Disabled private renters require adaptations to their bathrooms, kitchens, and other areas of their homes because the private rented sector in London is dominated by older housing stock, much of which was not designed to meet accessibility needs from the outset.

Despite the need for adaptations, many face huge barriers in securing the adaptations they need.

---

<sup>7</sup> Scope (2025) Disability Price Tag 2025. Available at: [Disability Price Tag 2025 | Disability charity Scope UK](#)

<sup>8</sup> Inclusion London (2025), See ref 3

<sup>9</sup> New Economics Foundation (2019) Getting rents under control: how to make London rents affordable. Available at: [Getting rents under control | New Economics Foundation](#)

While the Equality Act 2010, provides Deaf and Disabled private tenants with the right to request reasonable adjustments, including adaptations, landlords are entitled to refuse requests that involve removing or altering a physical feature if they consider the request to be “unreasonable”. What constitutes an “unreasonable” request is not clearly defined in legislation, creating significant ambiguity for both tenants and landlords. In practice, this is often determined through case law and court judgments, meaning that Deaf and Disabled renters may have to pursue lengthy and stressful legal action in order to challenge a refusal.

Our Barriers at Home research also found that, even where funding for adaptations exists within the private rented sector through the Disabled Facilities Grants, uptake is extremely low. These barriers are reflected in national statistics. While 18.8% of Disabled people live in the private rented sector, only 6% of Disabled Facilities Grants are allocated to private renters.<sup>10</sup> This disparity is particularly concerning given evidence that the private rented sector is the least accessible housing tenure.<sup>11</sup>

Local authorities told us that this low uptake of DFG is partly due to landlords refusing consent to adaptations, but also because Deaf and Disabled tenants are often reluctant to request them in the first place. Tenants are acutely aware of the insecurity of the private rented sector and may choose to remain in unsuitable homes rather than risk eviction or unaffordable rent increases by asking for adaptations.

As one local authority officer told us in relation to Disabled private renters applying for Disabled Facilities Grants:

*“[I don’t think] we even necessarily see the applications because I don’t think residents would even think they could ask, because they know what the answer would be. It’s so precarious to try and ask for anything from your landlord at moment.”*

Another highlighted the lack of incentive for landlords to consent to adaptations, noting:

*“They [landlords] can get their houses rented like that [click].”<sup>12</sup>*

Therefore, whilst the Renters’ Rights Act strengthens certain protections for tenants, such as removing no-fault evictions and fixed-term tenancies, which may increase tenants’ confidence to request adaptations, it does not introduce new, enforceable rights to have adaptations approved and installed in the private rented sector, nor does it introduce rent caps that would protect renters against retaliatory evictions through unaffordable rent increases. Without clear duties on landlords to allow adaptations, the Act is unlikely to lead to meaningful improvements in accessibility for Deaf and Disabled private renters.

### **A new private landlord database: an opportunity to embed accessibility into the PRS**

The introduction of a new online private landlord database is a positive change for private renters because it will give renters access to more information about their home and who they are renting from.

---

<sup>10</sup> Accessible PRS (2021) Disabled Facilities Grant (DFG) in the Private Rented Sector [Disabled Facilities Grant within the Private Rented Sector. \(accessibleprs.co.uk\)](https://accessibleprs.co.uk)

<sup>11</sup> Equality and Human Rights Commission (2018) Housing and disabled people: Britain’s hidden crisis. Available at: [Housing and disabled people: Britain's hidden crisis | EHRC](https://www.ehrc.org.uk/en/our-work/our-reports/housing-and-disabled-people-britains-hidden-crisis)

<sup>12</sup> Inclusion London (2025), See ref 3

While the Government has yet to confirm what information will be included in the database and what information will have to be made publicly available, it is clear that the database aims to help landlords understand their obligations and increase transparency for private renters, giving them the opportunity to have information available about a property before they decide to rent it. We believe this new database could represent a vital opportunity to embed accessibility into the PRS by requiring landlords to record information about the accessibility of their private rented properties. This could ensure the database has the most up-to-date information about the accessibility of private rented properties to improve access to the private rented sector for Disabled people.

Currently, Disabled people do not know whether advertised properties in the private rented sector have any accessibility features as rental listings do not include any standardised classification of accessibility features. In fast-paced rental markets like London the situation is even more challenging. With rising rents and competition between potential tenants attending mass viewings, there is no incentive for landlords to provide basic information about the accessibility of their properties. As a result, Disabled people are often unable to make informed decisions about potential properties to rent. Many Disabled renters report attending multiple property viewings only to discover on arrival that a property is inaccessible, sometimes to the extent they cannot even enter the building.

A database which requires landlords to keep up-to-date accessibility information would enable renters to assess the suitability of a home in advance, saving time and energy and reducing unnecessary journeys to inaccessible properties. In practice, this could be achieved by requiring landlords to commission and submit an independent surveyor's report when registering a property on the database. In addition to containing information about general property standards, such as energy efficiency, this surveyor's report could detail the accessibility features of the property. Crucially, accessibility information should cover a wide range of features. For example, while someone may be able to tell from a current property listing that a home is all on one floor with no internal stairs, they often have no way of knowing until they attend a viewing that there may still be a step at the entrance or into essential areas such as the shower. This information should be recorded on the database and made publicly available to tenants.

Accessibility information should also include information about non-mobility related accessibility features, such as flashing fire alarms for Deaf tenants. This level of detail would enable Deaf and Disabled people to assess suitability before visiting a property, reducing unnecessary barriers and wasted journeys to inaccessible properties.

A non-exhaustive list of potential accessibility features that surveyors could identify and record when surveying a property includes:

#### Bathroom/ Kitchen

- Graduated floor shower/ wet room
- Low level bath
- Bath/ shower seats or other aids to help in bath/ shower
- Raised toilets or other aids to help use the toilet
- Lever-style taps

#### Other rooms in the house

- Hoists

- Stairlift
- Switches and plugs at accessible heights
- Bed rails or other aids to help get in and out of bed
- Grab rails or additional handrails
- Level access
- Wide doorways
- Wheelchair storage
- Flashing doorbell
- Internal ramps
- Colour contrast
- Noise-reducing insulation
- Adequate lighting
- The minimum clear width of every hallway approach or landing is 1050mm

#### Outside the property / Communal area

- External ramp
- Rail by external steps
- Wide paths
- Wide gateways
- Wheelchair accessible parking space
- Lift
- Evacuation chair

#### Local area

- Within \_\_\_\_\_ of local accessible tube station
- Within \_\_\_\_ of bus stop
- Within \_\_\_ of local GP service

Including accessibility information within the database could also help to increase landlord awareness of their responsibilities towards Deaf and Disabled tenants, including the duty to consider reasonable adjustments and the availability of funding such as Disabled Facilities Grants to support adaptations. It could also provide a space for landlords to promote accessibility features in the homes that they let, encouraging others to consider accessibility changes to raise the standards of their own properties.

In addition, a national database containing accurate and consistent information on the accessibility of private rented homes would provide valuable data for local authorities and central government. It would support a clearer understanding of the current supply of accessible housing within the private rented sector and help identify gaps in the supply of accessible homes. This evidence base would be essential for monitoring progress and planning future policy interventions to improve housing options for Deaf and Disabled people.

### **7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

Many private renters in London, including Deaf and Disabled tenants, are not yet fully aware of the measures coming into force in May and do not have a clear understanding of their rights under the Renters' Rights' Act. Anecdotally, we are finding that, aside from the abolition of Section 21,

many Disabled private renters are unaware of the wider changes introduced by the Act and how these will impact them.

This lack of awareness is partly driven by the way information about the new law is being communicated. Most information is largely online, which is a barrier for many Deaf and Disabled people who are digitally excluded. Also, it is not available in alternative formats. For instance, the Government's 'Guide to the Renters' Rights Act explains the new rights tenants have, but is not currently available in any accessible formats, such as British Sign Language (BSL) and Easy Read.<sup>13</sup> This means that many Deaf people and neurodivergent people cannot access this information and fully understand their rights.

We are concerned that without targeted support and advice being provided to Deaf and Disabled tenants, many Disabled renters will not be able to fully understand what their rights are and will therefore not be able to benefit from the new protections. We believe the Mayor of London has an important role to play in ensuring that both renters and landlords understand their new rights and responsibilities, particularly tenants from more marginalised communities. Any resources or awareness raising activities promoted by the Mayor should be made available in a range of accessible formats. The Mayor of London could play a critical role in this by funding and supporting London advice organisations such as Deaf and Disabled People's Organisations (DDPOs) to provide tailored support to Disabled private renters on their rights under the Act.

The Mayor could also work in partnership with local authorities and the National Residential Landlords Association (NRLA) to improve access to home adaptations in the private rented sector. The NRLA has highlighted that landlords are often more willing to agree to adaptations when they understand that costs can be met through Disabled Facilities Grants, rather than falling solely on landlords themselves.<sup>14</sup> Building on existing pilot schemes and good practice, the Mayor could use his convening powers to raise awareness among both landlords and tenants about tenants' right to request adaptations, how Disabled Facilities Grants operate in the private rented sector, and landlords' duties under the Equality Act 2010. Strengthening collaboration in this way could help increase the uptake of adaptations by reducing refusals and support more Deaf and Disabled renters to request adaptations.

---

<sup>13</sup> Department for Levelling Up, Housing and Communities (2025) Guide to the Renters' Rights Act. Available at: <https://www.gov.uk/government/publications/guide-to-the-renters-rights-act/guide-to-the-renters-rights-act>

<sup>14</sup> Ministry of Housing, Communities and Local Government (2025) English Housing Survey 2022 to 2023: housing quality and condition. Available at: <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>



## **Evidence to London Assembly Housing Committee – Renters Rights Act**

### **Introduction and summary**

London Citizens Advice see approximately 200,000 Londoners every year, around 30% concerns housing issues. London Citizens Advice is the consortium of local offices and services (28 local charities) supporting residents across Greater London.

London Citizens Advice warmly welcomes the Renters Rights Act. For the Act to have the positive impact that private renters need, the GLA has a good opportunity to work with the Government and stakeholders (boroughs, Landlords, tenant advocacy and advice organisations) to get the implementation right. This means clear guidance for landlords and letting agents on the new rules, raising public awareness so tenants know their rights, and well-resourced enforcement by local authorities. There is huge potential to improve monitoring and enforcement through the new database and the Ombudsman jurisdiction, but we still need clarity on when these will be introduced and how they will work in practice. Citizens Advice nationally are calling for all provisions in the Act to be implemented as soon as possible to quickly deliver much-needed protections.

However there's still a lot of work ahead to fix the private rental sector and housing crisis, and to make London a more inclusive Capital City. Most importantly, the Act does not address persistent affordability issues and the pressures that are driving increased levels of homelessness, temporary accommodation, and overcrowding. Whilst the Government's target to build more social housing and new London plan to deliver 80,000 new homes are welcome, far more needs to be done to address affordability issues people are facing now. Around 11% of private renters are in a negative budget, where they have more going out than they do coming in, which is two thirds higher than the rate for all households. The gap between actual rents and the support available through the Local Housing Allowance is the cause of hardship for many renters. That's why Citizens Advice called for Local Housing Allowance to be updated to the 30th percentile of market rents to provide immediate support to low-income private renters.

Coming back to the Act itself, enforcement and compliance will be a key issue; the enforcement mechanisms via the courts (civil and criminal) are demonstrably not fit for purpose and local authorities have limited enforcement resources. The GLA, working with London Councils, should explore what levers it has to make the rights in the Act an enforceable reality. But this can only be part of the solution; London needs to break its dependency on a shrinking and increasingly unaffordable private rental sector, and support a more diverse range of affordable housing options across the Capital.

## Implementation and Enforcement in London

There are real concerns about the timescales for introducing many of the key measures the Act. For example, the proposed timeline for applying the Decent Homes Standard to the private rented sector stretches into the mid-2030s, leaving millions of renters in substandard housing for years to come. Similarly, there is still no confirmed timeline for extending Awaab's Law, despite the urgent health risks it is intended to address. So the concern is that many landlords with substandard homes will likely wait until they are forced to take action, and by setting such a late deadline the government are enabling them to do so.

The enforcement onus of the Act is placed significantly on local authorities, which needs to be incorporated into Boroughs wider housing strategies. But how will this work within a context in which local authorities already struggle to perform their main housing duty activities due to a shortage of affordable housing, resulting in families staying in temporary and often sub-standard accommodation for longer – a situation that is pushing councils to their financial limits. Government envisage that local authorities will be able to issue civil penalties against landlords who fail to comply with the measures in the Act and retain the revenues for future enforcement work, and will be able to use new investigatory powers to request information from third parties and enter premises to obtain evidence for cases. However, it is not clear where the additional resourcing will come from to take on this enforcement function – especially enforcement of the Decent Homes Standard (DHS).

The Housing and Communities Committee questioned the viability of a self-financing model of enforcement; even if this were viable it would take a number of years for any scheme to become self-financing. We therefore foresee a significant gap whereby enforcement standards could depend hugely on the financial position and political will of each London borough. There is an urgent case for reforming enforcement capability on a Pan-London basis – and need for London boroughs to pool their enforcement capabilities. London Trading standards for example exists only as a very loose consortium of the 33 Local Authority Trading Standards services in the London Region. There is also the even looser association of the Association of London Environmental Health Managers (ALEHM). However there is a lack of shared platforms and systems to realise the full value of a collaborative approach enforcement of the Renters Rights Act. At the same time, many London boroughs need to get their own house in order, several boroughs have been found by the Regulator of Social Housing (RSH) to hold sub-standard social housing stock.

When it comes to practical policies on licensing we can already see a pattern emerging of outliers, not all boroughs have introduced selective or additional licence requirements, and some go beyond mandatory requirements. For example

- Brent Council has extended its HMO licensing system to pull smaller properties into scope; rather than relying on complaints the Council has created its own

central database of ownership and management information that can be cross-checked against council tax records, housing benefit data and other datasets to flag addresses likely to be operating as unlicensed rentals.

We see an important role for the GLA on working pro-actively with London Councils to develop a common enforcement regime.

### **Limitations of the Act**

Given the limitations of the Act – especially the enforcement gap, the GLA should consider how these limitations could be best addressed at a London level. As flagged in our introduction, the Act leaves some of the most serious drivers of harm in the private rented sector unaddressed – especially the crisis in rent affordability. While limiting rent increases to once per year offers some stability, it does little to address the problem that rents are already unaffordable for millions of households. The existing system for challenging rent increases through the First-tier Tribunal is complex and intimidating, with few tenants even aware of its existence - it is rarely used and in a recent In a speech to the Housing Law Practitioners' Association, Geoffrey Vos, Master of the Rolls appeared to question whether the jurisdiction is fit for purpose. Even when renters do challenge increases, tribunal decisions are based on market rents that are already over-inflated. Unless these underlying issues are addressed, there is a real risk that economic evictions through unfair, unaffordable rent hikes, will be used as a 'de facto' section 21 by landlords, thus undermining the intent of the Act.

The Government has suggested they may introduce a new rent adjudication body / system to make the process more accessible, but this needs to look at the 'end to end' process of renting. Excessive rent in advance and tenancy deposit deduction have been longstanding concerns for Citizens Advice. While excessive rent in advance is restricted, landlords are still free to demand 'guarantors' – this disproportionately excludes renters without wealthy family members.

Without stronger interventions to curb excessive rents, affordability will remain the defining injustice of private renting. The Act leaves open other loopholes that risk undermining its protections. It doesn't fully address the risk of tenure flight - where landlords may seek to escape their new responsibilities by shifting properties into short-term lets or temporary accommodation where they may not have to meet the same standards or legal obligations. There is also little in the Act to regulate the professional conduct of landlords and letting agents, which will allow poor practices and exploitation to persist. Above, there are concerns about the strength of the Act in dealing with poor housing conditions too often faced by renters. These issues pose a challenge to the GLA and local government in London to look beyond a 'demimimis' compliance approach, and consider what is needed for a London Charter of renters rights

### **Awareness and access to information and advice**

Whilst we welcome the abolition of Section 21, renters can still be served an eviction notice – through no-fault of their own – after four months of a tenancy. If renters are to

receive anything resembling the security of other tenures, feeling confident to put down roots in their communities, this needs to be considerably longer. Whilst the abolition of section 21 will end the worst excesses of retaliatory evictions, other grounds may still be used as 'retaliatory' behaviour is likely to continue.

Derek is in his 50s and lives in North London. He had a stroke last year, which has left him unable to continue working. He was living in a rented property with significant disrepair issues, including erratic hot water supply and severe mould. His housing benefit payments do not cover the cost of his rent, and he is currently living on a negative budget, using his savings to get by. His landlord recently told him that he wanted to increase the rent. Derek told him that he was unable to afford the increase and that the condition of the property did not warrant this increase. Four hours later, he was served a Section 21 eviction notice. The landlord has been using intimidatory tactics, such as late night phone calls, to try to deter him from challenging the eviction. He came to Citizens Advice for support.

Hayley came to Citizens Advice after being served a s21 eviction notice. She received the notice shortly after reporting mould she feared was harming her young children's health. Hayley also spoke to researchers and said "I've gone through a lot in my life, but this has been by far one of the worst times due to all the stress. The best way I can describe it is: if you're a renter, you're only ever two pay-checks away from being homeless."

The changes will create more complex casework, stronger defences in possession cases, new routes for challenging disrepair, and increased demand for guidance on rent issues, Ombudsman processes, and local enforcement pathways. Emerging advice needs span housing conditions, financial resilience, energy, and legal protections.

Our advisers deal with issues concerning standards and practices in both the PRS and social sectors, but these intersect with other issues, especially financial resilience. For example.

Cheryl lives with her son in a one bedroom flat with leaks, damp and mould. Both have health issues and rely on means-tested benefits as their only income. Cheryl contacted Citizens Advice Camden when she reached crisis point after her landlord increased her rent: all of her benefits income was going on energy bills and rent shortfalls. An Adviser dealt with the immediate crisis by issuing a food voucher and obtaining a Cost-of-Living award payment from the local council. Citizens Advice Camden then appealed a decision not to increase Cheryl's Housing Benefit and she was awarded an increase that covered her rent in full, backdated to the date of her rent hike. She was also given advice about the landlord's responsibilities to repair her property moving forwards.

Advisers from Citizens Advice Greenwich met Yewande during Outreach at a Food Bank. She wanted to talk about her upcoming Jobcentre appointment and

problems with accessing benefits while her ID documents – her passport and residency card - were held by the Home Office. An Adviser assisted Yewande by contacting the Universal Credit Helpline, her immigration solicitor, and her landlord. As a result, the landlord agreed to halt possession proceedings while these issues were resolved. Appointments were arranged for Yewande with the Greenwich Welfare Rights and Greenwich Housing Rights teams. She is now receiving emergency financial support, and Greenwich Housing Rights is actively assisting with her housing challenges.

Janice a 59-years old and is living on her own in 2-bedroom Council accommodation sought help from Citizens Advice Westminster. Janice used to live in the accommodation with her ex-husband, but he moved out after they divorced; her daughter also used to live in the accommodation but is an adult now and moved out around 2020. She works part-time and receives Universal Credit. She had received a Universal Credit overpayment for not reporting that her daughter had moved out when she did, and also was having a £104.16 per month bedroom tax deductions on her Universal Credit. Janice was struggling to afford this shortfall in her rent due to her low-income situation. Janice also had some health-conditions which meant it was difficult for her to increase her part-time work hours beyond 8 hours per week. Janice was first seen by Citizens Advice to get advice about the Housing Element overpayment. She had already been in contact with DWP debt management to ask for lower deductions from her Universal Credit for the overpayment. The client was then seen in a separate face-to-face appointment to get help with a DHP application. During the appointment the advisor assessed Janice's budget and helped her fill out the DHP application to Westminster Council on the basis that she could not currently afford the rent shortfall and is looking into maximising their income by being in the process of completing a Universal Credit work capability assessment form and waiting on the outcome of a PIP appeal. The advisor also made a referral to the local foodbank asking for a food parcel to be delivered. The outcome of the Citizens Advice's intervention was that Westminster Council approved the DHP application and agreed to cover the full rent shortfall of £104.16 for around an 8-month period. This successful outcome has helped relieve some of the financial strain on the client as with the rent shortfall now covered it has freed up some money for client to use on living costs. The 8-month period has helped to give the client some time to try and increase her income through benefits or time to consider her housing options such as the potential need to down-size in the long-term. Janice was grateful for this help from Citizens Advice.

There is currently insufficient capacity within the advice sector to meet demand for housing advice in order to effectively enforce renters rights. As mentioned earlier Legal Aid is restricted, and as this area of work is more specialist than generalist advice, a wider problem for the sector is the development of specialist housing rights advice workers and lawyers – the workforce issues with the advice sector have been well documented, and advice organisations regularly lose staff to public bodies because advice charities struggle to offer competitive salaries (as sourced from funders).

However, it is important that the advice sector's response is not one of crisis response, but pro-active engagement to extend information and awareness in the community about the protections of the Renters Rights Act. For example through "Advice First Aid" models, information and support can be cascaded throughout the eco-system of advice sector VCSE partners. This has been an effective strategy with the GLA Funded Advising Londoners Partnership. London Citizens Advice have also worked with the Mayors Office on the development of the Rogue Landlord reporting tool, enabling pro-active enforcement and information sharing with London Trading Standards. Prevention approaches need to be prioritised alongside investment in information, advice, advocacy and pro-active enforcement.

# ▶ London Assembly Housing Committee Call for Evidence: Implementing and monitoring the Renters' Rights Act in

## ▶ London Councils' response

London Councils is the collective of local government in London, London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities to make the case for powers, freedoms and resources to best serve the needs of London's residents and businesses.

### Context

London is home to an estimated 2.7 million private renters. Privately rented properties now account for 31% of homes in the capital, much higher than the next closest regional average of just over 19%. Home ownership is unaffordable to many Londoners and there are extremely long waiting lists for social housing. As a result, having access to a safe, secure, and affordable private rental property is vital for many Londoners.

The regulations governing conditions and security within the PRS are therefore hugely consequential for London's housing sector. London Councils has welcomed the measures set out in the Renters Rights Act to ensure Londoners live in a fairer and better quality private rented sector, while also noting the need for a national strategy for the PRS. The PRS in London, as it has nationally, has experienced a significant reduction in supply since the Covid-19 pandemic. This has highlighted the need for both a strategic view of (and approach to) the tenure, an understanding of how sharp reductions in supply can be avoided, as well as the need for local authorities to be able to rapidly build and acquire more homes to insulate those at risk of homelessness from the sector's volatility.

### What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?

The Renters' Rights Act will significantly strengthen security, safety, and stability for London's private renters. The abolition of Section 21 "no-fault" evictions is expected to offer far greater housing security, particularly in a city where **4,630 households were threatened with homelessness via Section 21 in 2024/25**. These reforms should increase methods to prevent homelessness, with the end of an Assured

Shorthold Tenancy (AST) currently being the most common reason for prevention duties in London, accounting for 45% in 2024/25.

Renters will also benefit from higher minimum standards. With **178,000 non-decent private rented homes in London in 2024 (17% of the market)**, the extension of clear obligations on property quality is expected to materially improve conditions over time. The Act also strengthens councils' preventative powers, enabling earlier interventions to stabilise tenancies before crises escalate.

Landlords will operate within a more regulated and transparent system. The end of Section 21 means landlords will need to rely on fair, evidence-based grounds for possession. Landlords will also face greater expectations around home quality, with property conditions monitored more systematically as boroughs increase inspection and enforcement activity. In return, a clearer national framework gives responsible landlords greater certainty and helps level the playing field, especially where poor-quality or unlawful practice has previously undercut compliant landlords.

There are a number of ways through which we may be able to judge the success of the Renters' Rights Act. Some possible considerations include:

1. Reductions in homelessness and housing insecurity

- A fall in the number of households threatened with homelessness due to an eviction from a privately rented property.
- A decrease in the number of prevention duties owed where the end of a PRS tenancy is the trigger.
- An increase in the proportion of prevention duties successfully fulfilled, reflecting whether the Act's strengthened early-intervention powers are working.

2. Improvements in housing quality and safety

- A reduction in the number of non-decent PRS homes across London.
- Increased and more effective enforcement activity by boroughs (e.g., inspections, notices served, prosecutions), showing that landlords are complying with new standards.

3. Impact on PRS supply and stability

- Monitoring the overall size of the PRS to ensure the reforms do not inadvertently reduce supply.
- Tracking rent levels and turnover rates to understand whether longer-term tenancies and improved protections are providing greater stability.

**What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

To fully benefit from the protections in the Renters' Rights Act, private renters need **clear, accessible, and practical support** that enables them to understand their rights, navigate enforcement processes, and seek help early when issues arise. Renters require straightforward information explaining what the Act entitles them to, what landlords are required to do, what constitutes harassment or illegal eviction, how to report concerns, and what evidence they should try to retain - recognising that tenants often cannot collect evidence during moments of distress. This guidance must be provided in multiple

formats, and delivered through trusted local channels such as borough websites, advice agencies, GP practices, libraries, and community organisations.

In addition to accessible information, renters need **strong, early-stage advice to help resolve tenancy problems** before they escalate. This includes support to understand when they should stay in their home, when to contact the police, and what their local authority can do to protect them. Access to specialist advocacy - such as through Tenancy Relations Officers where they exist - will be important to help renters navigate complex enforcement processes and feel confident asserting their rights.

Boroughs have also identified opportunities to strengthen support through **integrated service models**. Embedding specialist housing advice within Family Hubs would enable earlier identification and assistance for households at risk. Co-locating family support and housing expertise would help link families directly into private rented sector enforcement and prevention pathways, provide earlier intervention for those facing financial pressure, rent arrears or tenancy instability, and generate better data to evaluate outcomes for families. This kind of joined-up approach would ensure renters receive timely, holistic support and are better able to benefit from the protections offered by the Act.

### **What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

London Councils estimates that boroughs are grappling with a funding shortfall of £1 billion this financial year (2025-26). While difficult to compare on a like-for-like basis, by 2028-29 London boroughs' Core Spending Power will remain 4% below 2010-11 levels in real terms and 17% below 2010/11 levels on a per capita basis. Within this context, particularly in light of uncertainty of new burdens funding, resourcing implementation of the Act is likely to be a significant challenge for councils.

The Renters Rights Act (RRA) is arguably the biggest change to housing law in over 30 years. It presents huge opportunities for local authorities to effectively prevent homelessness through increasing the security of the private rented sector. There will be landlords who are happy to comply, those who will find it difficult to comply, and those who will actively seek to evade their new responsibilities. Local authority enforcement and procurement teams have established relationship with landlords across their area and developing these relationships to support landlord compliance with the RRA will be essential to ensure it is implemented effectively to enable universal and targeted prevention.

Local authorities in London anticipate new challenges in monitoring and enforcing the measures introduced by the Renters' Rights Act, largely due to the scale of **cross-team coordination** required and the rising operational pressures associated with illegal evictions and harassment. Delivering the Act will require involvement from multiple services - including Tenancy Relations Officers (TROs), Housing Options, Environmental Health, and Trading Standards - but there is currently no single established model for determining which team should lead enforcement activity. This creates uncertainty around case ownership and risks inconsistent or fragmented processes, particularly where cases cut across departmental boundaries.

A further barrier to coherent enforcement is the **fragmented landscape of ICT systems** across different teams. Many services operate standalone systems that cannot communicate with one another, hindering data sharing, case tracking and meaningful collaboration. While some boroughs have begun using Business Analysts to map workflows and design shared processes, developing integrated systems will require time, capacity and investment that many councils currently lack.

The Act will also demand new ways of joint working that boroughs must build quickly. Alignment of roles and responsibilities across teams will be essential, but most boroughs will need to develop their own training and cross-service protocols from scratch to ensure consistent, coordinated enforcement.

A major challenge relates to illegal evictions, which boroughs expect to rise following the abolishment of section 21. Councils already report difficulties securing **police engagement** in these cases, despite illegal eviction being a criminal offence. Without timely police support, it becomes harder to prevent illegal evictions, gather evidence, or de-escalate situations before homelessness occurs. Boroughs such as Newham have developed training for the police to improve outcomes, but such practice is far from universal across London.

Where illegal eviction or harassment does occur, boroughs must respond immediately: if a tenant becomes homeless, the responsibility shifts to the local authority. However, obtaining evidence is often difficult as tenants are frequently frightened, distressed, or eager to leave the property quickly. This places a **substantial burden on council officers to collect evidence directly**, often requiring rapid attendance, investigative capability and specialist knowledge. Some boroughs, such as Redbridge, are developing rapid response teams to gather evidence and prepare prosecutions, but many lack the workforce or resources to replicate these models at scale.

Together, these challenges reflect the wide-ranging organisational, cultural and capacity changes required for effective enforcement of the Renters' Rights Act. Without clear leadership structures, integrated systems, strengthened partnerships with the police, and investment in rapid-response and investigative capacity, boroughs are concerned that they will struggle to meet the new duties and provide the level of protection that tenants are entitled to under the Act.

### **Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

London boroughs have significant concerns about their ability to effectively enforce the Renters' Rights Act due to the substantial capacity and resourcing pressures it creates. The Act is expected to generate a marked increase in enforcement activity, likely requiring a **significant expansion of officer capacity**.

Boroughs are already struggling to recruit and retain suitably qualified staff, particularly Environmental Health Officers, who are in short supply and heavily competed for by the private sector. Even where recruitment is possible, the time needed to train new officers presents a major challenge. Boroughs also highlight the need to **re-establish the role of Tenancy Relations Officers (TROs)** to meet new statutory duties, including the Duty to Report and enhanced data collection requirements. However, the absence of a professional body or agreed professional standards for TROs complicates efforts to build this workforce. Apprenticeships may provide a pipeline, but this is a long-term solution that will not meet immediate pressures.

At the same time, boroughs stress the importance of **responding quickly** to renter complaints and investing in early intervention and prevention work; areas that risk being squeezed if enforcement teams are overstretched. To sustain the additional workload, councils will need the ability to operate a **self-funding enforcement model**, with penalty income helping to cover the cost of new posts and wider resource demands. However, this is only viable if penalties are set at a level that both deters non-compliance and meaningfully offsets borough expenditure.

There remains uncertainty over whether the **new burdens funding** associated with the Act will sufficiently cover the upfront costs of preparing for implementation. Overall, boroughs are concerned that without adequate resourcing - both financial and workforce - many of the Act's new duties may be extremely challenging to deliver in practice.

### **How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

A key priority is working with the Metropolitan Police Service to **ensure officers are properly trained to respond to illegal evictions and harassment**, so that boroughs receive timely and informed support when these criminal offences occur. Strengthening police understanding of renters' rights will help create a more reliable and consistent response for Londoners experiencing unlawful eviction.

The Mayor can also play a critical role in coordinating **standardised data collection** across boroughs. A shared approach to gathering information on complaints, enforcement actions, property conditions, and outcomes will allow the GLA and local authorities to track the Act's impact more effectively. This consistency will help identify trends, highlight where additional support is needed, and ensure that the benefits of the legislation are visible and measurable across London.

Expanding the **Safer/Better Renting Programme** to all boroughs would provide practical support for implementing the new duties, offering training, guidance and shared resources. This expanded programme would strengthen enforcement teams and ensure renters receive consistent protection, regardless of where they live.

The Renters' Rights Act also introduces the ability for a local authority to take enforcement action against landlords operating outside its boundaries. To prevent rogue landlords from shifting their activities between boroughs to avoid scrutiny, the Mayor can help develop a **London-wide enforcement strategy**. A coordinated regional approach will ensure that where one authority acts, neighbouring boroughs reinforce rather than duplicate that work, closing gaps that non-compliant landlords might otherwise exploit.

Finally, the Mayor can support the **sharing of intelligence and best practice** across the region. Since landlords' portfolios regularly cross borough boundaries, the knowledge held by individual borough enforcement and procurement teams is highly relevant London-wide. Facilitating the exchange of this intelligence, along with successful strategies for engaging landlords and improving compliance, would significantly strengthen the consistency and effectiveness of enforcement across the capital.

The London Ending Homelessness Accelerator Programme, as a joint programme between London Councils and the Greater London Authority, provides an opportunity to better coordinate action related to the Renters' Rights Act between local, sub-regional and regional parts of government.

### **How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

While the new landlord database will make it easier to communicate directly with landlords, boroughs have highlighted **significant challenges in reaching tenants** - especially within London's highly transient population, where people frequently move between boroughs and may not engage with traditional communication channels. Boroughs are concerned that government communications to date

have largely focused on informing landlords of their duties, despite tenants being the group with less power and fewer resources to navigate these changes.

To address this gap, the Mayor could lead a **pan-London public awareness campaign** aimed at educating renters about their rights under the Act. Such a campaign would help ensure that tenants understand what the reforms mean in practice, including the shift to new tenancy structures, their ability to request pets, the limits on rent increases, and the strengthened bans on discrimination. A London-wide approach would ensure consistent messaging and would help reach renters who move frequently or who may not be connected to local borough-level channels.

### **What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

London is in the midst of a severe housing affordability crisis, driven by several factors including an unprecedented reduction in the availability of PRS properties, alongside a rapid increase in rents. This represents a significant challenge for London renters. Whilst we cannot yet ascertain the Act's impact on PRS supply, some landlords who do not want to comply with increased standards may exit the market.

Research from July 2023, commissioned by London Councils and partners, undertaken by Savills and the London School of Economics, found a **41% fall in rental listings across London since the Covid-19 pandemic (33% nationally)**. Further research shows that since 2021, the PRS in London has been contracting – From April 2021 to December 2023, **45,000 rental properties were sold without replacement**. This accounts for 4.3% of London's privately rented homes. Properties are leaving the rental market at the most affordable part of the market in London. **Only 5% of private rental listings in London are affordable to low-income households** using Local Housing Allowance (LHA) to pay their rent and the proportion of listings affordable across properties with 2 or more bedrooms is just 2%.

Properties leaving the rental market in the most affordable part of the sector undermines low-income households' access to the PRS, increases the risk of homelessness, and makes it harder for boroughs to prevent and relieve homelessness. The shortage of social housing in London means that securing privately rented properties is in most cases the only viable option for prevention and relief of homelessness. The reduction in PRS supply, combined with increasing rents, has severely undermined the ability of London boroughs' to source housing.

In light of these issues, London Councils is urging a **cross-departmental review into the supply of privately rented properties**. This could include an assessment of the collective impact of all relevant government policies, including the RRA and key economic factors such as the maturation of the buy-to-let market. The government should also develop a long-term PRS strategy alongside the RRA, which supports the provision of sufficient good quality, privately rented homes to meet demand. London Councils believes the government should develop financial incentives for private landlords to participate in the lower end of the market, with the aim of sustaining affordable PRS options. For example, landlords who agree to let to a lower sub-sector of the market for a reasonable length of time could be offered mortgage interest relief or capital gains tax relief.

Ref No. RR009/National Residential Landlords Association

## 1.0 About the NRLA

- 1.1 The UK's largest membership organisation for private residential landlords, the National Residential Landlords Association (NRLA), supports and represents more than 110,000 members across England and Wales.
- 1.2 Our members provide and/or manage approximately one million private rented homes across England and Wales.
- 1.3 NRLA members range from full-time landlords running property portfolios to individuals letting a single bedroom flat. We help them to navigate the regulatory and legal framework for the private rented sector and provide training and support for landlords to ensure they fully understand their responsibilities and are equipped to provide good quality housing for their tenants.
- 1.4 We conduct regular surveys of our members and other landlords, and tenants, providing market-leading intelligence about private renting. Our research informs our campaigns for policies that seek to improve the private rented sector for the benefit of tenants and responsible landlords.

## 2.0 Executive summary

- 2.1 The Renters' Rights Act represents the biggest set of changes to the rental market for nearly 40 years. It is vital therefore that, as we outline in this submission, clear metrics are developed, supported by key stakeholders in the sector, by the Mayor to understand its impact in the capital. This needs to include understanding:
  - Its impact on security of tenure for tenants.
  - The impact on the justice system and on the ability of responsible landlords to regain possession of their properties in a timely manner where there is good cause, such as tenant anti-social behaviour.
  - Whether it genuinely improves access to the sector for renters, or instead makes access more difficult.
  - The impact the measures in the Act have on the quality of housing.
  - The likely impact on the supply of rented housing in London, with all its implications on the ability of people to access work and educational opportunities.
- 2.2 Alongside this is the need for councils to have the resources they need to properly enforce the legislation to root out rogue and criminal landlords. Ultimately this needs to be financed through civil fines issued to those landlords failing to do what they should. However, to support improved enforcement, we call on the Mayor to back our proposals to:
  - Better understand the ability of councils to properly enforce powers to tackle rogue and criminal landlords by undertaking, and publishing, a full assessment of the resources local authority enforcement teams currently have, and will need, to enforce what is in the Renters' Rights Act.
  - Ensure transparency by requiring councils to publish an annual report on enforcement activity related to the private rented sector. Not only would this ensure councils are fully accountable for the work they are doing in this regard, but it would help to facilitate and support the sharing of best practice.

- Champion better enforcement by establishing a new national post of Chief Environmental Health Officer to drive the charge for better enforcement.

### **3.0 What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

3.1 The Act represents the biggest set of changes to the private rented sector for nearly 40 years.

3.2 There is no doubt that it strengthens renters' rights, not least by ending Section 21 repossessions, further strengthening their ability to challenge above market rent increases, and giving them enhanced tools to establish that the properties they rent are safe and of a decent quality, whilst providing new routes for redress where landlords are failing to provide the quality of housing they should be.

3.3 For landlords the impact of the Act will be considerable. Of particular note:

- Bringing tenancies to an end will always require a legitimate reason to be given based on one of the Grounds outlined in the Act. This will lead to greater pressure on the court system. Speaking recently the Master of the Rolls that the Act will *"undoubtedly create more contested possession cases than we have had hitherto."*<sup>1</sup> This is a court system which, during passage of the Act through Parliament, the Housing Minister accepted is *"on its knees."*<sup>2</sup>
- It is likely to open up any and all proposed rent increases to be challenged at the rent appeals tribunal, even where they are increased in line with market rents. As the Master of the Rolls has noted, as a result of the Act there will be an incentive for tenants to challenge a rent increase at the relevant Tribunal *"in respect of every increase to delay its implementation."*<sup>3</sup> This is within a Tribunal system that currently has just 34 judges sitting on it across the country.<sup>4</sup>
- Alongside the above landlords will be, among other measures:
  - Unable to refuse reasonable requests from tenants to keep a pet, although it is not clear from the Government what would constitute an unreasonable request.
  - Required to sign up to the proposed private rented sector database and the Ombudsman scheme for private landlords.
  - Required to meet the requirements of the proposed Decent Homes Standard for the sector (once these are confirmed) and Awaab's Law.
  - Adhere to new rules to prevent discrimination faced by benefit claimants and families with children seeking to access private rented housing.

---

<sup>1</sup> [Speech by the Master of the Rolls: Innovations in the Housing Sector – New Age Solutions for Age Old Problems](#), 8<sup>th</sup> December 2025

<sup>2</sup> Housing Minister, Matthew Pennycook MP, speaking at the Renters' Rights Bill Public Bill Committee session on 22<sup>nd</sup> October 2024. See the transcript [here](#).

<sup>3</sup> [Speech by the Master of the Rolls: Innovations in the Housing Sector – New Age Solutions for Age Old Problems](#), 8<sup>th</sup> December 2025

<sup>4</sup> HM Courts and Tribunal Judiciary, *First-tier Tribunal Judges*, available [here](#)

- 3.4 The NRLA's focus is now on ensuring the successful and smooth implementation of the Act. Alongside this, as the Committee has rightly noted, it is imperative that the impact of the Act is monitored closely.
- 3.5 In doing so, there needs to be clarity about a) what the Government plans to measure to understand the impact of the Act; and b) how and when it plans to publish insights it collects. As we outline below, broadly speaking, we propose the Act needs be judged based on:
- Whether it enables tenants to feel more secure in their properties.
  - If the justice system is able to cope with the impact of the Act.
  - The impact on the supply of rental housing.
  - If it improves access to the sector for those with pets, tenants in receipt of benefits and those with children.
  - Whether it ensures every rental property is of the good quality that the vast majority already are.
- 3.6 **Security of tenure for tenants**
- 3.6.1 During passage of the Act through Parliament, the Housing Minister declared that it would *“empower renters by providing them with greater security, rights and protections, so that they can stay in their homes for longer, build lives in their communities and avoid the risk of homelessness.”*<sup>5</sup> Based on his comments, a number of key data points will need to be measured carefully.
- 3.6.2 **Do the number of possession claims by landlords go down?** The most recently available data shows that between July and September 2025, 14,192 possession claims were brought to court under either the Section 21 or Section 8 processes by landlords in England.<sup>6</sup> In London that figure stood at 5,278.<sup>7</sup>
- 3.6.3 **Do tenants stay longer in their properties?** The most recent English Housing Survey data shows private renters have lived an average of 4.6 years in their current property.<sup>8</sup>
- 3.6.4 **Do the number of households facing homelessness as a result of the end of a rental tenancy agreement fall?** The most recent Government data shows that between April and June 2025 13,430 households in England were owed a homelessness prevention duty due to the end of a private rented Assured Shorthold Tenancy (AST) (2,720 in London). The most common recorded reason was landlords wishing to sell a property standing at 6,700 across England – 50% (980 in London – 36%).<sup>9</sup>
- 3.6.5 **Does the Act make it harder for private renters to access homelessness support when needed?** At present, the service of a Section 21 notice is the trigger for support for private tenants from their councils under the Homelessness Reduction Act. Under the new system, tenants in rent arrears or committing anti-social behaviour, who might otherwise have been served a Section 21 notice, will be handed a Section 8 notice outlining the reason for the property being repossessed. In these situations, such households will be deemed to have

<sup>5</sup> Housing Minister, Matthew Pennycook MP, speaking in the House of Commons on 22<sup>nd</sup> October 2025. See the transcript [here](#).

<sup>6</sup> Ministry of Justice statistics show that in the period July-September 2025, 7,066 claims were made to the courts in England by private landlords using the Section 8 route, whilst 7,126 claims were made by all landlords (social and private) using the Section 21 route. See table 8 [here](#).

<sup>7</sup> In the period July-September 2025, 2,621 claims were made to the courts in England by private landlords using the Section 8 route, whilst 2,657 claims were made by all landlords (social and private) using the Section 21 route. The data can be accessed at the Ministry of Justice's data visualisation tool [here](#).

<sup>8</sup> MHCLG, *English Housing Survey 2023/24 - Chapter 3: Housing history and future housing*, November 2024, available [here](#).

<sup>9</sup> MHCLG, *Statutory homelessness in England: April to June 2025*, October 2025, available in table A2P [here](#).

been made intentionally homeless, and therefore unlikely to automatically qualify for homelessness support from their local authority.

3.6.6 **The impact of reduced rental housing supply in the sector on the ability of tenants to secure tenancies.** This will be exacerbated by the impact of the one year 'no-letting' period associated with the sales possession ground (1A).

### 3.7 **Ensuring the justice system can cope with the impact of the Act**

3.7.1 There is no doubt that the Act will increase pressure on the justice system. Given this, as the Housing Minister noted during passage of the Act through Parliament, "*Court readiness is essential to the successful operation of the new system.*"<sup>10</sup>

3.7.2 Alongside this, the Minister also argued that the Government does not believe that the tribunal which hears rent appeal cases will be overwhelmed as a result of measures in the Act.<sup>11</sup>

3.7.3 Given the Minister's statements, it is vital that any assessment of the impact of the Act considers the degree to which his statements hold up to reality.

3.7.4 **In respect of the courts being ready**, the key metric to focus on will be the time it takes the courts to process, rule upon and, where needed, enforce legitimate possession claims brought by landlords. The most recent data available shows that across the country, the average (mean) time between a private landlord making a claim to the courts to repossess a property using the grounds-based route (Section 8) which will replace Section 21 and actually regaining possession of a property is 34.3 weeks.<sup>12</sup> This is the longest it has been since the start of 2022. This figure will need to come down if the Act is to achieve the right balance between the needs of tenants and responsible landlords.

3.7.5 Given the likely increase in possession cases needing to be considered by the courts, **access to legal aid for tenants reliant on it will be crucial.** At present, according to the Law Society, almost half (44%) of the population of England and Wales do not have a housing legal aid provider in their local authority area.<sup>13</sup> Should this figure not improve then many more tenants are likely to struggle to access the legal support they need.

3.7.6 Alongside this, there will be a need to **closely monitor the impact of the Act on the Tribunal that hears rental appeal cases**, particularly given the Master of the Rolls' warning that the current planned system will incentivise tenants to challenge a rent increase irrespective of whether it is in line with market rates or not. This is because:

- At present there is no way a tenant could be certain about whether a proposed rent increase is within market rates or not unless they test it at the Tribunal in the first place.
- Tenants can take rent appeal cases to the Tribunal free of charge.
- Irrespective of whether a proposed rent increase by a landlord is within market rates, any proposed rent increase would not take effect until at least the point when the Tribunal had made a decision. It would not be backdated to the point the original notice to increase the rent by a landlord would have come into effect.

---

<sup>10</sup> Housing Minister, Matthew Pennycook MP, speaking in the House of Commons on 14<sup>th</sup> January 2025. See the transcript [here](#).

<sup>11</sup> Housing Minister, Matthew Pennycook MP, speaking in the House of Commons on 29<sup>th</sup> October 2024. See the transcript [here](#).

<sup>12</sup> Ministry of Justice statistics show that in the period July-September 2025 the average (mean) time from a claim being issued by the county court to a private landlord repossessing a property under the Section 8 process, to them actually getting the property back, was around 34.3 weeks. This is the highest it has been since the first quarter of 2022 when it was 37.8 weeks. The data can be found in table 6 [here](#). At the top of the sheet where it says "Possession Type" on the drop down menu next to it just click "Private\_Landlord".

<sup>13</sup> The Law Society, *Housing – legal aid deserts*, February 2024, available [here](#).

- The Tribunal could not judge that a proposed rent increase by a landlord should actually be higher than what was originally proposed.

3.7.7 The most recent available data suggests that there are currently just 34 judges across the country sitting on the Property Tribunal responsible for hearing cases brought by renters to appeal above market rate rent increases proposed by landlords.<sup>14</sup>

3.7.8 Alongside this, despite having given itself the power to take action in the event that the Tribunal does become overwhelmed, the Government does not hold basic data to understand the likely impact of the Act on it, and therefore to know if the Tribunal is being overwhelmed or not. The Justice Minister, Baroness Levitt, has confirmed that the Government does not hold data on the average time it takes for the Property Tribunal to consider, process and rule upon rent appeal cases brought by tenants.<sup>15</sup>

### 3.8 Improving access to the private rented sector

3.8.1 Given the Act's welcome provisions to address discriminatory practices faced by tenants with children and those in receipt of benefits it will be important to monitor closely the impact the Act has on their ability to access rental housing. This is alongside the impact that provisions in the Act to improve access to the sector for those with pets will have.

3.8.2 According to the most recently available English Housing Survey data:<sup>16</sup>

- 6% of lone parents with dependent children currently in the private rented sector have reported being refused a tenancy in the last 12 months because of having children. This figure stands at 4% among couples with dependent children.
- 5% of private renters in receipt of housing benefit support have reported being refused a tenancy because they were in receipt of benefits.
- 7% of private renters say they have been refused a tenancy due to having a pet.

### 3.9 Quality of rented housing

3.9.1 Given measures in the Act to enable a new Decent Homes Standard to be applied to the sector, alongside extending Awaab's Law to cover it, the Government will need to monitor the impact it has on the quality of rented housing. At present:<sup>17</sup>

- 79% of private rented homes would meet the current Decent Homes Standard (despite it not being a legal requirement as yet) (78% in London<sup>18</sup>); and
- 89% of private rented properties do not have any damp problem.

## 4.0 What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?

<sup>14</sup> HM Courts and Tribunal Judiciary, *First-tier Tribunal Judges*, available [here](#).

<sup>15</sup> Justice Minister, Baroness Levitt responding to written question UIN HL10509 tabled by Lord Carter of Haslemere. The response in full can be accessed [here](#).

<sup>16</sup> MHCLG, *English Housing Survey 2023-24: rented sectors*, July 2025, available [here](#).

<sup>17</sup> MHCLG, *English Housing Survey 2023-24: Headline findings on housing quality and energy efficiency*, January 2025, available [here](#).

<sup>18</sup> MHCLG, *Figures for English Housing Survey 2023 to 2024 headline findings on housing quality and energy efficiency*, January 2025, see figure 1.5 [here](#).

- 4.1 The biggest challenge facing renters is ensuring they fully understand the changes being implemented and can make best use of them to hold rogue and criminal landlords to account.
- 4.2 According to research by the TDS Charitable Foundation,<sup>19</sup> 51% of private renters across England have heard of the Act but don't know how it will affect them, whilst 18% have not heard of it at all. This means that, at present, the majority of tenants are heading into the biggest package of rental reform in a generation without a clear understanding of their new rights and protections.
- 4.3 Given the importance of the Act, an overwhelming majority of tenants (82%) told the TDS Charitable Foundation that they want more information about how the Act affects them. When asked how they'd like to access that information:
- 41% prefer short, written guides on a dedicated website.
  - 35% want email newsletters.
  - 26% favour video content such as YouTube animations.
  - 21% would like printed leaflets.
- 4.4 Whilst the Government has committed to a dedicated tenant education campaign, this will not start until a month before the changes take effect. This should be brought forward.
- 4.5 Alongside this, steps are needed to ensure tenants understand the best route to resolve disputes when they arise. According to the TDS Charitable Foundation, two in five tenants would not know where to go next if the landlord/letting agent failed to address a housing problem.<sup>20</sup>
- 4.6 That is why we support, and would encourage the Mayor, local authorities in London and the UK Government to support the promotion of the TDS Charitable Foundation's 'My Housing Issue Gateway', a free tool designed to make it easier for tenants to access the help they might need on any given issue related to their rental property.<sup>21</sup>
- 5.0 What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act? And do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**
- 5.1 We have purposefully grouped these two questions together since they represent two sides of the same coin.
- 5.2 For too long what has been well meaning legislation affecting the sector has fallen at the first hurdle as a result of insufficient enforcement of it. In that respect we have serious concerns that this Act faces the same challenges.
- 5.3 According to the Chartered Institute of Environmental Health,<sup>22</sup> there are an average of just 2.46 environmental health officers for every 10,000 private rented sector dwellings in London. It is little wonder then that London Councils has warned that local authorities "will need

---

<sup>19</sup> TDS Charitable Foundation, *Seven in ten renters lack clarity on the Renters' Rights Act ahead of major reforms*, November 2025, available [here](#).

<sup>20</sup> TDS Charitable Foundation, *Living in the Private Rented Sector in 2025 – The Voice of the Tenant Survey, Wave 5*, June 2025, available [here](#).

<sup>21</sup> TDS Charitable Foundation, *My Housing Issue Gateway*, available [here](#).

<sup>22</sup> Renters' Rights Bill, *Written evidence submitted by the Chartered Institute of Environmental Health*, available [here](#).

*significant additional funds and resources to be able to implement their new duties and carry out enforcement.”<sup>23</sup>*

5.4 Whilst the Government has committed to new burdens funding for councils to support enforcement, we remain unconvinced that it will be enough to ensure proper enforcement of the Act.

5.5 Ultimately, enforcement should be financed via the civil penalties issued to those landlords failing to do what they should. This is the only equitable position that prevents the vast majority of responsible landlords having to foot the bill for the actions of a rogue and criminal minority.

5.6 To achieve this, councils need to improve the rate at which fines issued to landlords found to have breached their obligations are actually collected. Data obtained by the NRLA under the Freedom of Information Act found that between 2021/22 and 2022/23, councils across England collected less than half of the amount levied on landlords. A total of just under £13 million in penalties was issued, compared with only just over £6 million being collected by local authorities.<sup>24</sup>

## **6.0 How will the Renters’ Rights Act affect the Mayor’s Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

6.1 The Act should support the Mayor’s overall ambitions to address sub-standard housing, hold rogue and criminal landlords to account, and empower tenants.

6.2 Moving forward, we propose that the Private Rented Sector Partnership work with councils, tenant organisations and landlord bodies across London to develop clear and authoritative metrics against which to judge the impact of the Act in the capital. The partnership should be responsible for agreeing, and drawing on, the data sets that will help measure this, with a view to then publishing findings on a regular basis.

6.3 More broadly, as the Government develops the planned database of private rented sector properties and landlords, we would call on the Mayor to consider how best to ensure the Rogue Landlord Checker in the capital avoids duplicating the work of the database. Likewise, at a local authority level, given the database will provide them with details of all rental properties and landlords in their area, it is vital that local licensing schemes they might have in place avoid any unnecessary duplication of effort, not least seeking the same information from landlords for multiple different systems.

## **7.0 How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters’ Rights Act, and monitor the impact on Londoners?**

7.1 We would encourage the Mayor to back our call for the Government to:

- Better understand the ability of councils to properly enforce powers to tackle rogue and criminal landlords by undertaking, and publishing, a full assessment of the resources local authority enforcement teams currently have, and will need, to enforce what is in the Renters’ Rights Act.

---

<sup>23</sup> Renters’ Rights Bill, *Written evidence submitted by London Councils*, available [here](#).

<sup>24</sup> NRLA, *The Enforcement Lottery: Local authority enforcement 2021-2023*, May 2024, available [here](#).

- Ensure transparency by requiring councils to publish an annual report on enforcement activity related to the private rented sector. Not only would this ensure councils are fully accountable for the work they are doing in this regard, but it would help to facilitate and support the sharing of best practice.
- Champion better enforcement by establishing a new national post of Chief Environmental Health Officer to drive the charge for better enforcement.

## **8.0 How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

- 8.1 Clear and consistent messaging for tenants and landlords about their new rights and responsibilities under the Act will be key to ensuring its successful implementation.
- 8.2 It is imperative therefore that messaging related to preparing the Act from the Mayor is consistent with what is produced by the Government and other sector bodies.
- 8.3 Utilising the PRS partnership, the Mayor should work with all across the sector in London to make use of every avenue possible to ensure messages reach landlords and tenants in the capital. This should include working with buy-to-let mortgage providers, tenancy deposit schemes and HM Revenue and Customs.
- 8.4 Alongside this, working with sector bodies, the Mayor could develop a toolkit to send to all MPs, members of the GLA and local councillors in the capital with key messages they too could be promoting in support of the overall information awareness campaign.

## **9.0 What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

- 9.1 Landlords will make decisions about the provision of rental properties based on a wide range of factors including levels of demand, tax policy and the regulatory environment. The Renters' Rights Act will therefore be a factor when landlords make investment decisions, but not the sole one.
- 9.2 That said, key data points that should be monitored to understand what is happening in respect of the supply of rented properties in London should include:
- Government data which shows that between 2023 and 2024 the number of private rented homes in London fell by 6% from 1,136,000 to 1,069,000.<sup>25</sup>
  - Zoopla's research showing that 31% of homes for sale in London are former rentals, which is almost 3 times the average across the rest of the country (12%)<sup>26</sup>.
  - Analysis for London Councils and Trust for London which has found that properties are leaving the rental market at a much faster rate in the most affordable locations to rent in London.<sup>27</sup>
- 9.4 Of particular importance will be the need to monitor the supply of shared houses of multiple occupation (HMOs) in the capital going forward. With the blanket roll out of periodic

<sup>25</sup> Between 2023 and 2024 the number of private rented homes in London fell by 6% from 1,136,000 to 1,069,000 according to Government data. See table 'LT 109b rounded' [here](#).

<sup>26</sup> Zoopla, *Rental Market Report: December 2025*, December 2025, available [here](#).

<sup>27</sup> Trust for London, *Private rented housing supply in London (Updated 2024)*, available [here](#).

tenancies, it is likely that landlords will prioritise more stable long-term tenancies. This may lead to a reduction in the supply of shared homes that play a vital role in enabling young people to access employment opportunities and begin their careers in London.

- 9.5 For central government, it is imperative that when assessing the impact of the Act nationally, it includes a thorough assessment not just of national but also regional trends in the supply of rented housing.

**London Assembly Housing Committee****Call for Evidence: Implementing and monitoring the Renters' Rights Act in London****Response from Propertymark****February 2026****Background**

1. Propertymark is the UK's leading professional body of property agents, with over 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development<sup>1</sup>.

**Call for Evidence Overview**

2. The Renters' Rights Act 2025 received Royal Assent on 27 October 2025, with the first major phase of implementation set for 1 May 2026. With the introduction of new regulations, including new powers and expectations for local authorities, councils in London have expressed concerns that they will require new resources in order to enforce the Act effectively. This Call for Evidence seeks to understand the impact that the Act will have on London, specifically:
  - How the measures in the Renters' Rights Act can be implemented and adhered to in London.
  - Key challenges local authorities in London will face in monitoring and enforcing the measures in the Renters' Rights Act, including having the necessary capacity and resources to do so.
  - To what extent renters and landlords understand their new rights and responsibilities under the Renters' Rights Act.
  - What actions the Mayor of London should take to adapt his current and planned work on the private rented sector to reflect the new measures contained within the Renters' Rights Act.

---

<sup>1</sup> <https://www.propertymark.co.uk/>

- What actions the Mayor of London can take to support local authorities in London to implement, monitor, and enforce the measures in the Renters’ Rights Act.
- How the Mayor of London will monitor the impact of the Renters’ Rights Act on the wider London housing market

**Propertymark response – summary**

3. Propertymark welcomes the opportunity to respond to the London Assembly’s call for evidence on the implementation of the Renters’ Rights Act 2025. Prior to producing this written evidence, we submitted a briefing to all London Assembly Housing Committee members which this response expands upon. Propertymark members have a considerable presence in London, with hundreds of smaller firms and large corporate agents who manage hundreds of thousands of tenancies in total across the city<sup>2</sup>. Our members have seen the impact of Covid-19 and have concerns that, if improperly enforced, the Act will reduce the supply of available homes which will ultimately lead to the Act failing to improve security for tenants.
4. London is particularly vulnerable to some of the concerns expressed by our members, these include:
  - **London’s high student population** – it is estimated that there are more than 400,000 university students study in London<sup>3</sup>. Under the Renters’ Rights Act landlords with one- and two-bedroom properties cannot use Ground 4A to evict students when they graduate. New students rely on graduates vacating properties to find a home. If fewer graduates do not leave on time for the following years’ students, London’s student population will face a growing housing crisis.
  - **London has a large number of selective and additional licensing schemes** – as of November 2025, 60% of local authorities in London have at least one selective licensing scheme, with a further 50% having an additional licensing scheme<sup>4</sup>. The PRS Database has the potential to duplicate work and fees for landlords, potentially pushing many out of the PRS or leading to a reduction in landlords signing up to the Database.

---

<sup>2</sup> [https://www.propertymark.co.uk/find-an-expert.html?q=London&company\\_service=residential-lettings&orderBy=](https://www.propertymark.co.uk/find-an-expert.html?q=London&company_service=residential-lettings&orderBy=)

<sup>3</sup> <https://www.lse.ac.uk/student-life/London-life/A-student-city>

<sup>4</sup> <https://www.londonpropertylicensing.co.uk/selective-licensing/>

- **Short-term and holiday lets represent an attractive alternative to the PRS** – London has an estimated 82,000 properties used for short-term lettings, higher than any other part of the UK<sup>5</sup>. Even with London’s additional restrictions on short-term lets<sup>6</sup>, a comparative lack of regulations and higher yields compared to the long-term PRS could increase the number of short-term lets in London at a cost of the availability of private rented homes.
  - **Courts are especially overburdened in London** – the average possession time for landlords (from notice handed to eviction) is 8.5 months, which over 40% higher than any other part of the UK<sup>7</sup>. This makes eviction costs particularly high in London as landlords may not receive any rent during proceedings.
  - **London has a high proportion of landlords who rely on letting agents to fully manage their properties** – in 2019, the PropTech firm Rent Guarantor identified that 18% of rental homes in London were owned by overseas Landlords<sup>8</sup>. These landlords fully rely on letting agents to manage their tenancies but will be expected to join the new PRS Database and belong to a new Landlord Ombudsman scheme.
5. Considering the above, the Greater London Authority (GLA) and London’s Councils will face considerable challenges in achieving effective enforcement while ensuring healthy growth within the PRS. Considering that the size of London’s private rented sector has shrunk by 41% compared to pre-Covid-19 levels<sup>9</sup>, and the number of rented properties available has continued to fall since then, PRS stock is at critical levels<sup>10</sup>. Any further reduction would increase rents further and make it more challenging for tenants to move to more suitable homes.

### Call for Evidence – questions

**Question 1: What will change for private renters and landlords in London due to the measures introduced by the Renters’ Rights Act, and how will it be possible to measure their success?**

<sup>5</sup> <https://researchbriefings.files.parliament.uk/documents/CBP-8395/CBP-8395.pdf>

<sup>6</sup> <https://www.london.gov.uk/programmes-strategies/housing-and-land/buying-and-owning-home/guidance-short-term-and-holiday-lets-london>

<sup>7</sup> <https://hcegroupp.co.uk/news/2025/possession-delays-costing-landlords-thousands>

<sup>8</sup> <https://www.rentguarantor.com/news/landlord/52-number-of-international-landlords-in-the-uk-s-prs-rises>

<sup>9</sup> <https://www.londoncouncils.gov.uk/newsroom/2023/sharp-fall-private-rental-listings-means-londons-housing-pressure-going-bad>

<sup>10</sup> <https://trustforlondon.org.uk/research/private-rented-sector-accommodation-london-supply-2024/>

6. There are three major changes that we wish to highlight which will impact private renters and landlords in London due to the measures introduced by the Renters' Rights Act:

- **The first change is that vulnerable tenants will find it more difficult to find homes, with fewer reassurances for landlords to evict tenants who breach their tenancy agreements.** This is due to both the removal of Section 21 evictions and limits on taking rent in advance. Tenants who do not have a UK-based guarantor, can struggle to find suitable property, as there is an additional risk for the landlord to take on these tenants. Rent in advance helps tenants demonstrate their commitment to the landlord, providing the additional reassurance that a guarantor is meant to provide. However, the Renters' Rights Act prevents landlords from requesting more than one months' rent in advance of the tenancy commencing. While tenants are able to voluntarily pay for more than one months' rent after they have moved into the property, there is no legal mechanism requiring them to pay that even if they informally agreed to do so with the landlord. In addition to this, landlords have fewer options available to them if the tenant is not paying rent. Under existing legislation, if all other methods fail, a landlord could ultimately issue a Section 21 notice where a tenant is in rent arrears and has not guarantor who the landlord can call upon. However, with the removal of Section 21 notices, landlords would have to issue a Section 8 notice and seek a possession order from the courts. In London, this could take over 8 months for the court to issue an possession order. In that time, it is highly unlikely that the landlord will receive any rent. This great risk to the landlord will ultimately lead to landlords being more cautious when choosing tenants, with tenants perceived as a greater risk being less likely to be approved. While the Act does make explicit discrimination illegal, landlords and agents with multiple tenants expressing interest can still choose who will live at the property. This will risk forcing vulnerable tenants to seek rogue landlords and agents who would provide poorer quality homes and take advantage of the tenants' vulnerable situation.
- **The second change is that students will find it more challenging to find suitable accommodation.** This is another consequence of changes to evictions, including the lack of a specific ground for one and two bedroom student homes, as well as the restricts on rent in advance. Within the Renters' Rights Act, a new ground, Ground 4A, will be introduced to allow landlords to replace existing tenants who are graduating with new tenants who need a home for the next academic year. However, this ground can only be used for properties that are

HMOs, meaning any landlords with property that have fewer than 3 bedrooms cannot evict their tenants even if they have graduated. Tenants who do eventually move out without the ground being issued will have no obligation to do so before the start of the following term, meaning that landlords will struggle to find any tenants until the next academic year. Our members have reported that many of these landlords are discussing selling up entirely or switching to non-student tenancies. As a consequence, students will struggle to find accommodation during their time at one of London's many universities as student accommodation is highly competitive. The issue is compounded for international students who often don't have UK-based guarantors and will no longer be able to pay rent in advance.

- **The third change is that complying with new legislation will be more difficult for landlords who live overseas.** One Propertymark member managing over 40,000 tenancies in London has 4,000 tenancies that they manage on behalf of landlords living in China and Hong Kong alone, and this is not unique to that agent. Landlords living overseas often hire a letting agent to fully manage their property, but the introduction of the Act cause two issues. Firstly, the Renters' Rights Act introduces explicit requirements for landlords, such as registering with the Landlord Database and PRS Landlord Ombudsman that a letting agent cannot do on their behalf. Secondly, without the regulation of property agents, there is inconsistency in the quality of service the agent provides to both the landlord and tenants. While Propertymark members have access to training and resources to help them understand the new requirements of the Act, letting agents who do not voluntarily sign up to higher standards may not be aware of the new requirements or will not be sure of them due to conflicting guidance. Furthermore, overseas landlords are a lot less likely to be aware of legislative changes or fully understand them due to language challenges; that is after all why they hire a managing agent.
7. All of this risks a reduction in supply as extensive changes taking place at one time will cause some landlords to consider selling while deterring potential new landlords until the full impact of the regulations can be assessed. The London Assembly must take note of changes in housing supply levels, in comparison to rising population levels and other factors of demand, to ensure that there is sufficient private rental stock available.

**Question 2: What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

8. There are three measures that can be introduced to support private renters to help them benefit from the measures contained in the Renters' Rights Act:

- **The first of which is to ensure that housing targets within London reflect demand for all tenures, and that the right incentives are in place to ensure that built to rent homes are made available for the private rented sector.** This will help to increase the supply of available homes within the private rented sector, allowing for tenants to easily move if they need to move to a new part of London or there is an issue at their property that is not being resolved. Without the ability for tenants to move home more freely, the measures introduced by the Renters' Rights Act will not increase security for tenants. Tenants would not be able to move to a better home if there is little stock available for them to do so. Increasing supply so that there are fewer potential tenants looking to move per property available also helps to relieve pressure on rents and ensures landlords will not turn away more vulnerable tenants.
- **Secondly, local authorities across all London boroughs should agree to a single guide on how to comply with the Act and take steps to ensure any enforcement action is consistent. This will help tenants, agents and landlords to fully understand their responsibilities and set clear expectations for enforcement action.** Setting this consistency is incredibly beneficial for landlords and agents who have properties across multiple London boroughs, avoiding confusion and improving compliance. Tenants will benefit from the improved compliance of landlords and letting agents as well as a better understanding of their own rights and responsibilities, especially if the guidance and enforcement doesn't change if they move into a different London borough.
- **Thirdly, enforcement action must prioritise tackling rogue landlords and agents, while supporting agents and landlords who are actively trying to comply with the regulations.** Many landlords and agents are concerned that, considering the number of new regulations, they will inadvertently breach the regulations despite all efforts to do so. By approaching these agents and landlords with an education-first approach to prevent repeat offences, local authorities can make it clear that there is no need for landlords to sell their properties out of fear of receiving considerable fines. Rogue landlords however who provide poor quality properties and who pay little mind to their legal requirements should face large financial

penalties. This will make it clear that standards need to be upheld and only good quality landlords and agents should be providing homes in the PRS. This will have a greater impact on raising standards while preventing a decline in available stock.

**Question 3: What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters’ Rights Act?**

9. There are three main challenges for local authorities in London in monitoring and enforcing measures introduced by the Renters’ Rights Act:

- **The first is the challenge in targeting rogue landlords and letting agents.** While the Landlord Database introduced by the Act is designed to better inform tenants of the standard of properties, rogue landlords are not likely to be registered onto the Landlord Database or if they are, they may involve the uploading of false documents. Rogue landlords are also not likely to advertise their property openly, making it even more challenging for local authorities to identify which properties in their jurisdiction are being let out illegally or at a poor standard. Local authorities must actively inspect properties and carry out additional investigations into the use of properties that they suspect to be rented out by rogue landlords.
- **Secondly, local authorities will need to work closely in order to ensure consistency in messaging around guidance and enforcement.** We would recommend that organisations such as London Councils, the London Assembly and Greater London Authority should lead on guidance and establish core principles of enforcement to ensure that local authorities are able to greater consistency.
- **Thirdly, local authorities already face a considerable funding shortfall and will struggle to find the capacity to increase inspections.** We expand on this in our response to question 4.

**Question 4: Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters’ Rights Act?**

10. Based on London Councils assessment of their current capacity and resources, local authorities in London will struggle to effectively monitor and enforce measures introduced by the Renters’ Rights Act. While there is no definitive public statement on staffing levels for private rented sector

inspections, London Councils has agreed with the UK Government’s assessment on the poor state of local authority finances, with an estimated shortfall of £500m in 2025<sup>11</sup>. Historic cuts have led to considerable reductions in repairs, inspections and spending within the social rented sector<sup>12</sup>, which indicates cuts across all housing tenures. Local authorities across London are being required to do more at a time where housing staff turnover rates have been as high as 20% in recent years<sup>13</sup>. Based on this understanding, local authorities will need more funding to support the enforcement of measures introduced by the Renters’ Rights Act.

**Question 5: How will the Renters’ Rights Act affect the Mayor’s Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

11. Our comments are on the understanding that this question refers to the Mayor’s vision for private renting in London<sup>14</sup>. There is one area that will need to be accelerated and two that should be reviewed pending a review of the impact of the Renters’ Right Act.
  
12. The commitment to reforming courts must be accelerated. The removal of Section 21 notices will lead to an increase of evictions through the Courts. London has the UK’s highest average timeframes for evictions from notice to eviction, at 8.5 months according to the High Court Enforcement Officers Association<sup>15</sup>. Tenant support charity Shelter estimates that there were 11,400 Section 21 evictions where bailiffs were required to evict tenants between July 2024 and June 2025, with 30,000 Section 21 notices issued in England during the same period<sup>16</sup>. Due to the removal of Section 21 notices, we will see thousands of more evictions going through the Courts every year as landlords issue Section 8 notices to tenants instead. Existing evidence suggests that the removal of Section 21 notices will lead to an increase in Section 8 notices, as the English Private Landlord Survey 2024 shows the primary four reasons for a landlord evicting a tenant are valid

---

<sup>11</sup> <https://www.londoncouncils.gov.uk/news-and-press-releases/2025/london-councils-responds-parliamentary-report-warning-cliff-edge-local>

<sup>12</sup> <https://www.londoncouncils.gov.uk/news-and-press-releases/2025/budget-approaches-london-boroughs-highlight-rent-convergence>

<sup>13</sup> <https://www.insidehousing.co.uk/news/one-in-five-housing-staff-in-london-could-leave-this-year-new-data-says-82503#:~:text=Inside%20Housing%20%2D%20News%20%2D%20One%20in,the%20course%20of%20this%20year.>

<sup>14</sup> <https://www.london.gov.uk/programmes-strategies/housing-and-land/mayors-priorities-londons-housing-and-land/reforming-private-renting-london?ac-54164=54161>

<sup>15</sup> <https://hcegrouop.co.uk/news/2025/possession-delays-costing-landlords-thousands>

<sup>16</sup> [https://england.shelter.org.uk/media/press\\_release/11400\\_no-fault\\_bailiff\\_evictions\\_in\\_the\\_year\\_since\\_government\\_committed\\_to\\_ban\\_them](https://england.shelter.org.uk/media/press_release/11400_no-fault_bailiff_evictions_in_the_year_since_government_committed_to_ban_them)

Section 8 grounds<sup>17</sup>. These are that the property was not cared for, the tenant was in arrears, the tenant engaged in anti-social behaviour and that the landlord wanted to sell the property. An increase in waiting times for Courts to make a decision has negative consequences for both good landlords and good tenants. Rogue landlords can use the lengthy and costly court times to place pressure on tenants to leave the property, even if they have a good chance of winning their legal case. Tenants seeking to take advantage of the lengthy court process however can stay put at the property while continuing not to pay rent or breach the terms of the contract. In short, a faster, well-resourced court process that makes quicker decisions is in the best interests of which party is in the legal right.

13. We would recommend that efforts to improve security through tenancy reform and powers to control rents should be temporarily paused until a full review of the impact of the Renters' Rights Act can be made. Should there be a reduction in stock within the PRS, and a subsequent increase in average rents, then taking similar measures would reduce supply further, placing even greater pressure on rents.

**Question 6: How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

14. There are three ways that the Mayor can support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act:

- **Firstly, improving the competency and standard of letting agents will help to improve compliance and the quality of service to tenants without requiring local authorities to actively inspect properties.** Since there are no qualification or training requirements for letting agents in England, the quality of service and compliance with regulations is inconsistent. Considering the limitations on local authority resources, we would propose that introducing requirements for letting agents to be qualified in London would be a long-term solution. In the short-term, requiring letting agents to register with an approved professional body, and allowing professional bodies to regulate their members, can help to improve standards without the need to establish a new body in London for the monitoring of the standards of letting agents.

---

<sup>17</sup> <https://www.gov.uk/government/statistics/english-private-landlord-survey-2024-main-report/english-private-landlord-survey-2024-main-report>

- **Secondly, the Mayor of London must direct and support London-wide guidance on the Renters’ Rights Act as well as support local authorities to establish consistent enforcement practices.** If these are driven centrally by the GLA, rather than individually by local authorities developing their own standards, greater consistency in both guidance and enforcement is more likely to be achieved.
- **Thirdly, in light of the removal of Section 21, the GLA should consider publishing updated guidance on homelessness.** There is currently confusion around if local authorities should advise tenants to stay at properties until they receive a possession order by the court<sup>18</sup>, although sections 6.29-6.38 of the latest version of the Homelessness Code of Guidance for Local Authorities states that there should not be a blanket policy that the tenant should always or never stay at the property but that the local authority should take steps to work with the landlord to identify how the tenant can remain at the property<sup>19</sup>. Updated guidance should take the opportunity to reduce confusion and to advise local authorities on how to proceed if a Section 8 notice has been issued as Section 21 notices will no longer be legal.

**Question 7: How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

15. The two most important ways that the Mayor can help renters and landlords understand their new rights and responsibilities under the Act have already been mentioned in our response to question 6:

- **Firstly, create a single set of guidance and enforcement policies across all London Boroughs.** This will help improve the consistency of messaging, improve understanding from both landlords and tenants and prevent landlords and tenants from having to learn how each London Borough interprets and enforces the legislation.
- **Secondly, through working with professional bodies such as Propertymark, introducing greater standards and requirements for letting agents helps to ensure that more agents**

<sup>18</sup> <https://www.property118.com/are-councils-acting-illegally-when-telling-tenants-to-stay-put/>

<sup>19</sup> [https://assets.publishing.service.gov.uk/media/693042c54bedc0e762303fd1/Homelessness\\_code\\_of\\_guidance\\_18\\_Nov\\_2025.pdf](https://assets.publishing.service.gov.uk/media/693042c54bedc0e762303fd1/Homelessness_code_of_guidance_18_Nov_2025.pdf)

**in London understand the Act and how they need to adjust their standard procedures.**

Setting these standards also increases trust in the sector which, along with greater knowledge of the Act, will help letting agents resolve disputes between tenants and landlords.

**Question 8: What impact will the Renters’ Rights Act have on the supply of rented properties, and how can this be monitored?**

16. We are concerned that the Renters’ Rights Act will have a negative impact on the supply of rented properties. While efforts have been made by Propertymark and the sector to avoid this, as fewer rental properties is not in the best interests of tenants, landlords or letting agents, Propertymark members continue to report that a considerable number of landlords have expressed their interest to sell. The English Private Landlord Survey 2024 highlighted that the two largest reasons that landlords sold as recent and forthcoming legislative changes<sup>20</sup>. In London there is evidence to suggest that the number of homes for sale for owner occupiers has increased considerably, that 22% of all newly listed homes for sale in inner London during July 2024 were rented out at some point in the previous decade<sup>21</sup>. This was a ten-year high and compares to 9% across the whole UK over the same period. Once the Renters’ Right Act has been implemented, the PRS Database combined with local authority licensing schemes would serve as a good way to monitor the size of the PRS. If the number of landlords and properties registered across local authorities and the Database changes, that would serve as a way to monitor the impact of the Act.

<sup>20</sup> <https://www.gov.uk/government/statistics/english-private-landlord-survey-2024-main-report/english-private-landlord-survey-2024-main-report#starting-and-ending-tenancies>

<sup>21</sup> <https://www.estateagenttoday.co.uk/breaking-news/2024/08/london-landlord-exodus-on-the-rise-warning/#:~:text=Ongoing%20tax%20and%20regulatory%20clampedowns,%E2%82%AC%C2%AFresearch%20from%20TwentyCi.&text=Colin%20Bradshaw%2C%20chief%20executive%20of,London%20it%20is%20%C2%A32%2C399.>

## **London Assembly Housing Committee**

**Call for Evidence:** Implementing and monitoring the Renters' Rights Act in London

**Submission from Race on the Agenda (ROTA)**

### **About Race on the Agenda (ROTA)**

Race on the Agenda (ROTA) is a Black and Global Majority-led racial justice charity and infrastructure organisation, established in 1984. We work to challenge systemic racial inequality by centring lived experience, building evidence, and influencing policy and practice across public systems.

ROTA supports and represents a membership of 2,876 organisations, groups and individuals across the UK, including Black-led charities, grassroots organisations, and practitioners working at the intersection of race, inequality and social justice.

Our work on housing and homelessness focuses on exposing and challenging the structural drivers of racialised housing insecurity and homelessness. Through research, policy advocacy and lived-experience leadership, ROTA works to reframe homelessness as a systemic and preventable inequality, rather than an individual failure, and to embed racial equity into housing policy, legislation and implementation.

This submission draws on ROTA's sustained work on race and housing, including evidence developed through the Brick by Brick programme, which brings together people with lived experience of homelessness, housing insecurity and discrimination to inform national and regional policy change.

### **Q1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

The Renters' Rights Bill introduces significant changes to the private rented sector, including the abolition of no-fault evictions, the move to periodic tenancies, limits on rent increases, and expanded enforcement powers for local authorities. These changes have the potential to improve security and standards for renters across London.

However, to assess whether the Bill is successful, it is essential to start from the reality of who is most exposed to risk within the private rented sector.

Black and Global Majority (BGM) communities are disproportionately impacted by homelessness and housing insecurity and are significantly more likely to be reliant on the

private rented sector. Our own research tells us Black households are more than three times as likely to experience homelessness as White households, a disparity driven by structural inequalities rather than individual circumstances. These inequalities are shaped by housing shortages, unaffordability, poor conditions and discriminatory practices across both the social and private rented sectors.

Because BGM communities are overrepresented in the private rented sector, the Renters' Rights Bill will have a disproportionate impact on these groups. Whether that impact is positive or harmful will depend on how the measures are implemented and monitored.

ROTA therefore argues that success cannot be measured solely through aggregate indicators (such as overall eviction rates or landlord compliance). Instead, success must be measured through:

- changes in homelessness risk for groups already facing disproportionate impact
- reductions in discriminatory outcomes
- improved security and stability for renters most exposed to precarity

Without ethnicity-disaggregated monitoring and equality impact assessment, it will be impossible to determine whether the Bill is reducing inequality or reproducing it.

## **Q2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

Stronger rights on paper do not automatically translate into protection in practice, particularly for renters facing discrimination, power imbalances, or distrust of statutory systems.

Evidence from our work shows that BGM renters are more likely to:

- struggle to access properties in the first place
- experience informal or insecure arrangements
- avoid reporting poor conditions or discrimination due to fear of retaliation

Discrimination at the point of access to private renting significantly restricts housing options for BGM households, increasing reliance on informal or rogue landlords where protections are weakest. This dynamic heightens eviction risk and undermines the effectiveness of legal reforms.

To ensure renters can benefit from the Bill, support must include:

- accessible and trusted routes for reporting landlord misconduct and discrimination
- clear, consistent information that reaches communities most affected by insecurity
- support models that recognise cultural, linguistic and systemic barriers

Without this, those already facing the greatest risk of homelessness are least likely to benefit from the new measures.

**Q3. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters’ Rights Act?**

The principal challenge for local authorities will be capacity, compounded by the absence of race-specific monitoring requirements.

Local authorities are being asked to enforce new duties in the context of prolonged funding pressure and uneven enforcement capacity across boroughs. This raises particular risks for BGM communities, as uneven enforcement tends to disadvantage renters with less social capital or confidence to challenge landlords.

A further challenge is the lack of mandatory ethnicity-disaggregated data. Without this:

- patterns of discriminatory enforcement or landlord behaviour remain hidden
- possession and eviction trends cannot be analysed through a racial equity lens
- local authorities are unable to identify where implementation is reinforcing existing inequalities

The Bill’s effectiveness therefore depends not only on legal powers, but on whether local authorities are equipped to implement them in a way that actively reduces racialised risk.

**Q4. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters’ Rights Act?**

ROTA’s assessment is that, at present, capacity and resources are insufficient and unevenly distributed.

This matters because enforcement gaps are not neutral. Where enforcement is weak or inconsistent, renters facing discrimination are less likely to see improvements in security or

conditions. In boroughs with high concentrations of Black and Global Majority (BGM) residents, under-resourced enforcement risks accelerating displacement rather than preventing it.

In addition to financial and workforce capacity, effective enforcement also depends on meaningful engagement with communities most affected by private rented sector insecurity. Greater engagement with community organisations and housing advisory groups that support BGM communities would strengthen local authorities' ability to monitor compliance, identify emerging risks, and respond to discriminatory practices that are often under-reported or obscured within formal enforcement systems. These organisations frequently have early visibility of issues such as informal evictions, discriminatory gatekeeping and landlord behaviour that may not be captured through statutory routes.

Without additional resourcing, clear guidance, accountability mechanisms, and structured engagement with trusted community-based organisations (as set out further in Q7), there is a real risk that the Bill's protections will exist in theory but not in practice for those most exposed to housing insecurity

**Q5. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

The Renters' Rights Act significantly increases the importance of the Mayor's existing work on the private rented sector, particularly through the Private Rented Sector Partnership, manifesto commitments on renters' rights, and action to improve housing standards.

In his manifesto, the Mayor committed to backing renters to defend their rights through advice and guidance, including funding for renters' groups and renters' unions, and to holding landlords to account on housing standards — including freezing City Hall funding where necessary. The manifesto also committed up to £4 million in new funding to establish a GLA best practice hub for landlord licensing and to support renters' organisations, recognising that new rights are only meaningful if they can be enforced.

The Mayor of London's Housing Strategy Impact Assessment explicitly recognises that Black and minoritised communities are overrepresented in the private rented sector and may benefit most from improvements in quality, affordability and security. However, while the Impact Assessment acknowledges race, the Housing Strategy itself does not set out explicit mechanisms for addressing racial inequality within the private rented sector. This creates a gap between evidence and delivery.

Implementation of the Renters' Rights Act presents a critical opportunity for the Mayor to align:

- the evidence set out in the Housing Strategy Impact Assessment
- stated commitments to racial equality and fairness
- and the practical operation of private rented sector reform through the PRS Partnership

Without this alignment, there is a real risk that the Act is implemented in a way that improves average conditions while overlooking the very communities identified as most affected.

The Private Rented Sector Partnership therefore has a pivotal role to play in translating manifesto commitments into practice. This includes supporting consistent landlord licensing across boroughs, sharing best practice on enforcement, strengthening links with renters' organisations and advice services, and ensuring that action to hold landlords to account on housing standards is applied equitably.

ROTA considers equality impact assessments and the collection of ethnicity-disaggregated data to be essential to this task. These tools would enable the Mayor and partners to monitor whether reforms are reducing racialised housing insecurity, target support and funding where it is most needed, and ensure that the Renters' Rights Act contributes to genuinely safe and decent homes for all Londoners rather than reproducing existing inequalities.

#### **Q6. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

ROTA calls on the Mayor to play a proactive leadership role by:

- 1. Embedding equality impact assessments into implementation**  
Equality impact assessments should be mandatory, ongoing and published, with findings used to shape enforcement priorities and policy adjustments.
- 2. Requiring ethnicity-disaggregated data collection and reporting**  
Data on evictions, possession proceedings, enforcement action, complaints and outcomes should be collected and published consistently across London boroughs.
- 3. Monitoring place-based risk**  
Given emerging trends in possession activity, the Mayor should prioritise boroughs with high concentrations of BGM residents, where enforcement and market responses risk driving displacement.

#### 4. Ensuring accountability in delivery

Monitoring should focus not only on compliance, but on whether implementation is reducing racialised homelessness risk.

### Q7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?

Understanding of new rights and responsibilities is likely to be inconsistent unless the Mayor adopts a targeted and structured approach to communication, guidance and support. The Mayor has already recognised in his manifesto that new rights are only meaningful if renters are supported to enforce them, including through advice, guidance and funding for renters' groups and renters' unions.

To ensure the Renters' Rights Act is understood and applied in practice, the Mayor should prioritise three areas:

- **Strengthen renter capacity through trusted advice and collective support.**  
Black and Global Majority renters are more likely to experience discrimination, informal tenancy arrangements and power imbalances with landlords, which can limit their ability to assert rights. Targeted investment in renters' unions, advice services and community-based organisations is therefore necessary to support awareness, enable enforcement and reduce fear of retaliation, particularly among renters who have historically been marginalised by statutory systems.
- **Provide clear, authoritative guidance for landlords that establishes expectations and consequences.**  
Landlord-facing communications should clearly set out the new tenancy framework, restrictions on rent increases and enforcement consequences, while explicitly stating that discriminatory practices and substandard conditions are unacceptable. Transparent and visible enforcement is critical to reinforcing compliance and driving behavioural change across the private rented sector.
- **Ensure communications are accessible, inclusive and targeted to those most affected.**  
General public messaging alone will not reach all renters. Information on rights and responsibilities should be disseminated through a range of channels, including community networks and organisations working with Black and Global Majority communities, to ensure those most exposed to housing insecurity are informed and supported.

ROTA considers this approach essential to ensuring that the Renters' Rights Act functions as a practical safeguard rather than a purely technical reform. By combining authoritative guidance, visible enforcement and sustained investment in renter-led support, the Mayor can strengthen understanding, compliance and accountability across London's private rented sector.

**Q8. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

Evidence suggests that the impact of the Renters' Rights Act on the supply of rented properties must be understood within the context of an already constrained housing system, characterised by chronic shortages of social housing, rising homelessness, and sustained reliance on the private rented sector as the primary safety net.

Demand for private rented accommodation has increased as households are unable to access social housing and as local authorities increasingly rely on the private rented sector to discharge homelessness duties. The Government's *National Plan to End Homelessness*, which places greater emphasis on prevention and rapid rehousing, is likely to further increase demand for private rented homes, particularly in high-pressure urban areas such as London.

Evidence indicates that when demand outstrips supply in the private rented sector, access becomes increasingly shaped by discrimination rather than availability alone. Research shows that BGM renters face barriers at the point of access, including differential response rates to enquiries, heightened scrutiny, and exclusionary selection practices. More recent evidence demonstrates that Black and minoritised people often feel compelled to conceal aspects of their identity in order to secure housing, highlighting the extent to which racism structures access to the private rented sector.

In this context, changes in landlord behaviour following the Renters' Rights Act including landlords exiting the sector, increasing rents, or tightening tenant selection criteria — are likely to have disproportionate consequences for groups already facing discrimination and exclusion. Reduced supply or heightened competition does not affect all renters equally; it amplifies existing inequalities in access and increases reliance on informal or insecure arrangements, including rogue landlords, where protections are weakest and eviction risk is highest.

Early trends in possession activity raise concern about how private rented sector reform is interacting with these structural inequalities. Official possession data show rising possession actions in several large urban local authorities between 2023 and 2025. Many of these authorities also have the highest concentrations of Black and Global Majority residents, who

are already disproportionately reliant on the private rented sector and face elevated homelessness risk.

While possession data are not disaggregated by ethnicity, the geographic concentration of increased possession activity in areas with large Black populations suggests a heightened risk that reforms are unfolding in ways that compound existing inequalities. In the absence of race-conscious safeguards and monitoring, it is not possible to assess whether implementation is contributing to disproportionate housing instability for BGM households.

Taken together, the evidence indicates that potential unintended consequences of changes to supply and landlord behaviour include:

- **pre-emptive evictions** as landlords respond to regulatory change
- **rent increases** that push housing beyond affordability for low-income and racialised households
- **increased reliance on informal or rogue landlords**, where protections are weakest and eviction risk is highest

Monitoring the impact of the Renters' Rights Act on supply therefore requires more than tracking the number of landlords or properties. ROTA recommends that monitoring focuses on the following evidence-informed indicators:

- **Changes in private rented sector capacity**, including landlord exits, rent increases and shifts in tenure, at both London-wide and borough level
- **Demand-side pressure**, including use of the private rented sector to meet homelessness duties and trends linked to homelessness prevention policies
- **Access to the private rented sector**, including refusal rates, non-response at enquiry stage and reliance on informal or insecure rental arrangements
- **Displacement and exclusion**, particularly in areas with high concentrations of BGM communities
- **Ethnicity-disaggregated data**, to assess whether changes in supply and access are disproportionately affecting racialised groups

At present, the absence of ethnicity-disaggregated data within private rented sector monitoring makes it impossible to assess whether supply-side changes are reinforcing existing racial inequalities. This data gap limits the ability of policymakers to understand how reforms interact with discrimination and homelessness risk.

ROTA therefore considers the collection of ethnicity-disaggregated data and the use of equality impact assessments to be essential components of monitoring supply. Without these measures, the impact of the Renters' Rights Act risks being assessed solely through aggregate market indicators, while masking increased exclusion and housing insecurity for BGM communities.

## References

Race on the Agenda (ROTA) & Heriot-Watt University (2022) *A Statistical Report on the State of the Nation: Housing and Homelessness*.

Available at: <https://www.hw.ac.uk/documents/ror/statistical-report-state-of-the-nation.pdf>

Race on the Agenda (ROTA) (2024) *Racial Discrimination in Housing: Briefing*.

Available at: <https://www.rota.org.uk/resources/racial-discrimination-in-housing>

Race on the Agenda (ROTA) (2007) *The Visible and Hidden Dimensions of London's Homelessness*.

Available at: <https://www.rota.org.uk/resources/visible-and-hidden-dimensions-of-homelessness>

Shelter (2024) *Access to Social Housing for People of Colour: Literature Review*.

Available at: [https://england.shelter.org.uk/what\\_we\\_do/updates\\_insights\\_and\\_impact](https://england.shelter.org.uk/what_we_do/updates_insights_and_impact)

Shelter (2023) *Prejudice in Practice: Racism in the Private Rented Sector*.

Available at:

[https://england.shelter.org.uk/what\\_we\\_do/updates\\_insights\\_and\\_impact/prejudice\\_in\\_practice\\_racism\\_in\\_the\\_private\\_rented\\_sector](https://england.shelter.org.uk/what_we_do/updates_insights_and_impact/prejudice_in_practice_racism_in_the_private_rented_sector)

Crisis (2024) *Racism and Homelessness: Understanding Structural Drivers*.

Available at: <https://www.crisis.org.uk/ending-homelessness>

Heriot-Watt University (2025) *Black and Minoritised People Feel Forced to Disguise Their Identities*.

Available at: <https://www.hw.ac.uk/news/2025/black-and-minoritised-people-feel-forced-to-disguise-their-identities>

Greater London Authority (2018) *London Housing Strategy Impact Assessment*.

Available at:

[https://www.london.gov.uk/sites/default/files/2018\\_lhs\\_impact\\_assessment\\_fa.pdf](https://www.london.gov.uk/sites/default/files/2018_lhs_impact_assessment_fa.pdf)

UK Parliament (2025) *Renters' Rights Bill: House of Lords Debate – Baroness Janke*.

Available at: <https://hansard.parliament.uk>

# London Assembly Housing Committee Inquiry into Implementing and Monitoring the Renters' Rights Act in London

Written Evidence from the Renters' Reform Coalition

## **About the Renters' Reform Coalition**

The Renters' Reform Coalition (RRC) is made up of 18 leading housing organisations, from national housing charities and think tanks, to advice centres and renters' unions. We are united in our mission to reform the private rented sector so that everyone who relies on it for their housing can prosper.

The Coalition has come together to offer solutions for change, with the purpose of shaping the government's approach to renting policy. Our members have a broad range of expertise on housing and associated issues. They represent all parts of the renters' movement, and campaign for policy change both inside and outside of the Renters' Reform Coalition.

## **1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

The introduction of the Renters' Rights Act represents the most significant improvement to renters' protections in more than a generation. Once implemented on 1 May 2026, the Act will bring in a swathe of new measures to protect renters from unfair landlord practices that are commonplace in private renting. With many of the issues and challenges of renting pronounced in the capital, these changes stand to particularly benefit London's 2.7 million renters.

At the heart of the reform is the banning of Section 21 'no-fault' evictions – where landlords are able to evict a tenant without being required to give a prescribed reason. Instead, landlords will be able to regain possession of a rented home on a set of specified grounds, such as to sell the home or cases where the tenant has not been paying rent. This will bring a transformational improvement to the security and stability of renters in their homes. Removing Section 21 evictions will genuinely empower renters by giving them the ability to raise issues such as a need for a repair in their home with a reduced fear of a retaliatory eviction from their landlord. To highlight the need to reduce unnecessarily frequent evictions in the capital, London local authorities account for 6 of the 10 boroughs with the highest rate of private landlord repossessions.<sup>1</sup>

---

<sup>1</sup> MoJ Mortgage and landlord possession statistics, , <https://www.gov.uk/government/statistics/mortgage-and-landlord-possession-statistics-october-to-december-2024/mortgage-and-landlord-possession-statistics-october-to-december-2024#landlord-possession-timeliness>, February 2025

From May, the Act also bans a range of unfair and harmful practices carried out by landlords. Measures in the Act include limiting rent in advance to 1 month, prohibiting rental bidding wars, preventing unreasonable refusal of a tenant owning a pet, and banning discrimination against prospective tenants with children and people receiving benefits. Again these measures will particularly stand to benefit London renters, where 1 in 4 private renters has had to bid on a rental property to secure a tenancy,<sup>2</sup> and fewer than one in ten rented homes are pet friendly.<sup>3</sup>

Longer term, the Act will enable the Government to introduce further measures to improve landlord accountability and renters' rights. Within the next 12 months, a national database of landlords will be introduced. In the years ahead, Awaab's Law will be applied to the private landlords, to set expected timelines to respond to tenant's reports of hazards, and a Private Rented Sector Ombudsman Service will be introduced. In 2035, the Decent Homes Standard will be applied to private rented homes, which will set a comprehensive baseline standard of quality and safety.

It will be possible to measure the success of these reforms through monitoring a range of quantitative indicators, for instance in the annual English Housing Survey, as well as gathering qualitative data through engaging with renters on their lived experience.

The success of the Renters' Rights Act can be assessed by examining whether it meaningfully strengthens security of tenure and shifts the balance of power towards tenants. This would be particularly evident through a reduction in evictions. A key qualitative measure of success would be increased tenant confidence: renters should feel able to assert their rights, challenge unfair landlord practices, and raise complaints without fear of retaliation or eviction.

In addition, higher rates of enforcement following tenant complaints would signal that the Act is working as intended. We would expect to see more investigations by local authorities, and a rise in recorded enforcement actions, including increased civil penalties issued to landlords who fail to comply with the law. If complaints are more consistently acted upon and lead to timely resolutions, it would demonstrate that tenant rights are not only formally protected on paper but are also practically enforceable.

To monitor whether the changes are having their intended impact, a number of indicators should be monitored that measure the following:

- Renters' understanding of their rights
- Renters' sense of security and overall satisfaction with renting
- Frequency of evictions, use of the new possession grounds and tenant mobility rates
- Quality and conditions of renters' homes, including presence of hazards, EPC ratings and the timeliness of repairs
- Renters' confidence in raising issues, and the level of access to redress
- Volume and nature of complaints received by local authorities

---

<sup>2</sup> Cornerstone Tax, [Research reveals 20% of tenants battling 'bidding wars' for homes - Cornerstone Tax - The UK's leading property tax advisers](#), April 2024

<sup>3</sup> SW Londoner, <https://www.swlondoner.co.uk/life/16072024-fewer-than-one-in-ten-london-rentals-are-pet-friendly>, July 2024

- Enforcement response rates and outcomes
- Criminal landlord behaviour, including instances of harassment and illegal evictions
- The prevalence of landlords using guarantors and other potential exclusionary practices

This can work alongside wider monitoring of the private rented sector in London that includes the number of rented homes and the average cost of renting.

## **2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

For renters to benefit from changes brought in by the Act, they must be able to effectively challenge their landlord where there has been a breach of their protections, by ensuring they have:

- An understanding of their rights under the new system, to be able to recognise when those rights are being breached
- Confidence to challenge their landlord without fear of negative consequences
- Access to advice services, including free legal advice
- Access to effective and timely enforcement

The starting point for supporting renters with the changes to their rights is raising awareness of the upcoming changes. 7 in 10 renters in England do not have an understanding of how the Act will change their rights.<sup>4</sup> Nonetheless, raising awareness of the Act isn't enough in making sure that the new protections are upheld in practice - accessible support and routes to justice are equally as important.

Some demographics of renters present lower awareness of their rights overall, or face additional barriers to asserting them, and will require targeted support, notably: younger renters, students, digitally excluded renters, minority ethnic renters, and renters with low incomes.

Tenants' unions, charities and advice services already play a critical role in bridging these gaps: 13% of London renters are aware of the Act due to these organisations - more than in any other area of the country.<sup>5</sup> Sustained partnership and funding for trusted advice services will be essential to supporting renters to benefit from their new rights. There is also a need to improve the availability of free legal advice for tenants: a lack of access to these services is frequently a barrier to tenants challenging their landlord.

Local authorities can also play a role in awareness raising, but the most important support they can offer to renters is ensuring that it is accessible and straightforward to escalate a complaint where landlords are in breach of the Act. Local authorities must ensure they are able to support tenants with timely responses, open communication and clear action where an issue has been reported. A key step towards improving local authorities' support and services for renters would

---

<sup>4</sup> TDS Charitable Foundation, <https://www.tdsfoundation.org.uk/post/seven-in-ten-renters-lack-clarity-on-the-renters-rights-act-ahead-of-major-reforms>, November 2025

<sup>5</sup> TDS Charitable Foundation, <https://www.tdsfoundation.org.uk/post/seven-in-ten-renters-lack-clarity-on-the-renters-rights-act-ahead-of-major-reforms>, November 2025

be to introduce a tenant relations officer role within councils, where such a role does not already exist.

Underlining the need for local authorities to provide renters with a clear route to challenge their landlords is the wait for the future Private Rented Sector Ombudsman. The new Ombudsman service will play an important role in improving tenants' access to resolving complaints against their landlord and potential redress but is not expected to be established until at least 2028. In the intervening years, local authority enforcement will be the primary vehicle through which renters can challenge poor landlord practices and assert their rights. It is therefore important for councils' development of new enforcement processes in response to the Act to progress at pace.

### **3. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

The Renters' Rights Act will only be as effective as its enforcement, and this is where our greatest concern lies. We anticipate a key barrier to meaningful enforcement of the Act to be the limited resources and capacity of local authorities – we will expand on this challenge in further detail under our response to question 4.

Another key challenge for local authorities is that enforcing the Act is heavily reliant on tenants coming forward and self-reporting breaches of the legislation, in a context where tenant awareness and confidence to challenge a landlord is limited. There are a variety of barriers to tenants escalating breaches of the Act to local authorities. While the Act will empower renters by reducing the risk of a retaliatory evictions through banning Section 21 no-fault evictions, challenging a landlord will remain intimidating - particularly where renters fear retaliatory actions, immigration consequences, or financial risk, such as a rent increase.

If renters do not understand their rights, do not feel safe in reporting breaches, or do not believe enforcement will lead to meaningful outcomes, many violations will go unreported and non-compliant landlords will continue harmful practices without facing consequence. Addressing this challenge will require a highly proactive approach from councils in supporting renters and taking effective action.

Furthermore, we anticipate that certain elements of the Act will be more challenging for local authorities to enforce, where it will be harder to identify or obtain sufficient evidence of breaches. Examples of practices prohibited by the Act that will be more challenging for councils to enforce against include:

- Rental bidding wars, as landlords and lettings agents could arrange for bidding and ask for offers for higher rent behind closed doors.
- Discrimination against prospective tenants with children or those that receive benefits, which may not be clear where numerous prospective tenants would like to rent a property.
- Unlawful reletting within the 12-month period following an eviction to sell, as tenants will have left the home and it may not be directly evident to them that it has been re-let.

Again, identifying and addressing these breaches of the Act will demand fostering strong awareness among renters as well as the confidence to actively report concerns.

The challenges in reducing common harmful practices in renting go beyond the introduction of the Act. For example, there are frequent failures in protecting renters from illegal evictions, which have a poor track record of enforcement action, and as well as lack of reliable data on their occurrence. While there are thousands of recorded illegal eviction cases nationally, the charity Safer Renting found that landlords were prosecuted for illegal evictions in less than 1% of cases in 2022.<sup>6</sup> The Act itself will not address this issue, with the rate of illegal evictions only likely to increase following the end of Section 21 no-fault evictions and the introduction of a more limited set of grounds for possession in place. Tackling illegal evictions and other deeply harmful criminal landlord practices will require a renewed approach to enforcement from councils.

#### **4. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

The Act not only brings a new system of rights for renters but introduces several new legal obligations for local authorities to enforce these protections. However, most London local authorities do not currently have the capacity or resources to meaningfully enforce existing regulation of the private rented sector, let alone the expanded responsibilities they will have under the Act.

While the Mayor's initiatives have contributed to slightly higher enforcement rates in London compared to other regions, overall enforcement activity remains low and highly inconsistent across local authority areas. Over three years in 2022-24, more than a third of London councils did not prosecute a single landlord. Of those prosecuted, only 8 landlords in London have been banned from letting homes in this 3-year period.<sup>7</sup>

To meaningfully enforce the Act and improve conditions for renters in practice, there is a need for local authorities to adopt a proactive approach to enforcement. The key barrier to this, however, is insufficient and unpredictable funding. The capacity of local authorities to enforce renters' protections has been affected by funding cuts to councils over the last 15 years.

A lack of funding has not only limited the expansion of enforcement processes but created a struggle for councils to maintain enough experienced and knowledgeable staff, with many local authority workforces having reduced in size over several years of funding cuts. A lack of consistent and predictable funding only makes it more challenging for local authorities to recruit new enforcement staff. Furthermore, councils frequently report they find a shortage of suitably qualified staff when looking to recruit new enforcement and environmental health officers. The lack of workforce capacity harms local authorities' ability to develop new processes in response to the Act and be more proactive in their enforcement.

There are new powers coming in through the Act that can help contribute towards more proactive and well-resourced enforcement, such as new inspections powers for councils and new on-the-spot fines – which councils should utilise to boost enforcement. However, the current annual New Burdens funding of £18.2m granted by central government to fund enforcement of the Act across all English councils will be insufficient to improve enforcement

---

<sup>6</sup> Safer Renting, [Press-Release-Safer-Renting-Illegal-eviction-and-harrassment-report-1-December-2023.pdf](#), December 2023

<sup>7</sup> The Guardian, [Two-thirds of English councils have not prosecuted a single landlord in past three years | Renting property | The Guardian](#), November 2025

capacity to the level needed to adequately support renters in practice. We therefore believe that expanding licensing could play an important role in supporting local authorities' enforcement capabilities beyond the introduction of the Act – particularly by providing a sustained, reliable source of funding.

Licensing also provides local authorities with the powers and means to address a range of prevalent issues for renters that go beyond the Act. For example, they can impose license conditions that address overcrowding - a pronounced issue in London where 8.5% of privately rented homes are overcrowded.<sup>8</sup> Licensing allows local authorities better oversight of rented homes and a clear means through which to routinely carry out inspections, allowing councils to carry out more proactive and thorough enforcement.

However, there are significant gaps in licensing of rented homes across London. Though larger Houses in Multiple Occupation (HMO) are required to have a mandatory license, more than a third of HMOs in London that should have a mandatory license have not been issued one.<sup>9</sup> Additional and selective licensing are also greatly underutilised, with 40% of London local authorities not operating a single selective licensing scheme.<sup>10</sup> While introducing licensing schemes present a modest cost to landlords, the funds they can provide to councils are invaluable in improving their enforcement capabilities.

## **5. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

The Act should be seen as catalyst for change that the Mayor can build on, rather than a single solution for the array of challenges faced by London's renters. The incoming Renters' Rights Act only strengthens the case for existing manifesto commitments to improve standards, enforcement and accountability in the private rented sector. The Mayor has correctly identified that stronger enforcement and accountability is essential to raising standards for renters, and implementing the Act will require further efforts to step up enforcement across all London boroughs.

The upcoming legal changes also reinforce the importance of the Private Rented Sector Partnership, which will be a vital vehicle for co-ordinating an effective response to the Act's introduction across London councils. The upcoming changes to tenants' legal protections will not improve renters' circumstances without a proactive effort and new approaches to enforcement across all London local authorities, which the Partnership can help to drive and facilitate.

However, the Act does not address the rent affordability crisis facing London renters. For many renters in the capital, the exorbitant cost of rent will remain their greatest source of insecurity and hardship. Without stronger protections against unaffordable rent increases, there is a risk that 'economic evictions' – where a rent increase effectively serves as an eviction by pricing a tenant out of their home – will replace section 21 no-fault evictions as a way for landlords to

---

<sup>8</sup> Greater London Authority, [Housing in London annual report – London Datastore](#), January 2025

<sup>9</sup> Greater London Authority, [Housing in London annual report – London Datastore](#), January 2025

<sup>10</sup> London Property Licensing, <https://www.londonpropertylicensing.co.uk/selective-licensing/>, November 2025

remove tenants. The continuing of the Mayor's commitment to call for rent controls across London and a broader New Deal for Renters therefore remains imperative.

## **6. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

The Mayor can play a vital leadership role to ensure the Act delivers meaningful change on the ground. This should centre on coordinating across London's local authorities to drive consistent and proactive enforcement.

To enable meaningful enforcement of the Act across London, we recommend the Mayor focuses on the following actions:

- Facilitating sharing of best practices and learning across local authorities on new enforcement approaches and processes in response to the Act
- Supporting councils to make full use of the new powers available to them through the Act, including the new inspection powers and expanded scope for civil penalties, and utilise existing routes to boost enforcement capacity, particularly expanding licensing schemes
- Creating transparency and accountability for upholding the new framework of renters' rights through benchmarking and public reporting of key indicators, building on the existing Rogue Landlord Checker.

While central government will be undertaking some work to monitor the impacts of the Act, the GLA can also support with its own work in improving circumstances for renters by closely monitoring trends in the experience of renting in London specifically. We would encourage the GLA to implement a London-focused framework for monitoring the experience of renters on the ground.

The results of any monitoring activity should be publicly available and used to hold both landlords and local authorities to account. The indicators and trends that would be helpful to monitor the impact of the Act are discussed under our response to question 1.

By working with councils, the GLA could coordinate uniform data collection across boroughs so data can be disaggregated by locality, which could give a more detailed picture when assessing changes in the renting experience in different areas.

## **7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

We would encourage the Mayor to lead a coordinated, London-wide programme of awareness-raising in partnership with local authorities, renters' unions and advice charities. This should include a range of online and physical mediums for promoting the upcoming set of changes. For example, utilising the advertising opportunities offered by the Transport for London network to signpost to further guidance on the Act could help in reaching a large number of London's renters.

In line with the Mayor's manifesto commitment, partnering with and supporting tenants' unions and charities that offer advice to renters should be a central pillar in improving tenant awareness of the Act across London's diverse renter population and improving renters' routes to access support.

#### **8. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

The future impact of the Act on the number of privately rented homes is uncertain, but there is currently no strong evidence that the Act itself will lead to a significant reduction in supply. Decisions by landlords to sell properties are influenced by a range of wider factors, including taxation, interest rates and other policy areas impacting renting, rather than the relatively modest administrative changes required from landlords by the Act. Furthermore, when a landlord does decide to sell a rented home, it will be purchased by another private landlord, a council, a first-time buyer or another owner-occupier - it won't disappear from the housing stock.

Claims that basic renter protections undermine supply should be treated with caution. If a landlord feels unable to meet their obligations under the Act, it is more appropriate for the home to be purchased by someone who is better placed to deliver safe and secure housing for their tenants.

Changes in the availability of homes for private rent can be monitored by collecting data on: use of the new possession grounds; changes in tenure following the sales of rented homes; and the volume of rental home listings. It will also be helpful to monitor homelessness rates and the number of people in need of temporary accommodation.

## London Assembly Renters Rights Act: Call for Evidence

### Safer Renting Response

#### 1. What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?

##### Monitor use of no-fault grounds

- The abolition of section 21 is expected to enhance security of tenure for tenants. However, the Renters' Rights Act does not eliminate so-called "no-fault" eviction in practice. Under the current framework, section 21 claims are subject to a range of procedural safeguards, which can operate effectively to prevent evictions and to sustain tenancies. These safeguards will not be carried over into the policy climate. Instead, tenants will have access to only two procedural defences in relation to the new possession grounds: i. compliance with deposit protection requirements; and ii. the landlord's obligation to hold a valid registration on the proposed database. The database will only be rolled out at the end of the year which leaves a gap where the only procedural defence will be related to the deposit. Additionally, the threshold of evidence for the use of the no fault grounds is low. Therefore, there is a risk that there will be a reduction in protections afforded to tenants rather than an increase.
- This could be measured through monitoring of the use of the new no-fault eviction grounds.

##### Monitor the use of the s13 mechanism

- The revised rent increase mechanism may provide tenants with limited additional capacity to manage in-tenancy rent rises. Its effectiveness will depend on tenants' awareness of the lawful process for rent increases and their ability to challenge them.
- This could be measured by monitoring the volume of challenges to section 13 notices and the outcomes reached by the tribunal.

#### 2. What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?

- Renters who experience barriers to accessing advice and support, such as those who are digitally excluded, will require targeted assistance to ensure they are aware of the forthcoming changes. The provision of accessible information, available in a range of languages and disseminated through third-sector organisations and community networks, will be essential to supporting awareness among individuals and groups at heightened risk of exploitation. Drawing on research conducted in collaboration with Clearview Research on effective methods of supporting marginalised communities, Safer Renting has developed accessible materials designed for individuals with a limited understanding of their housing rights. These resources are intended for dissemination after May 1<sup>st</sup>.
- Renters with limited English proficiency and/or those who are digitally excluded will require additional advocacy support to effectively enforce their rights. This need arises in part from the introduction of new digital systems through which tenants will

be expected to challenge rent increases and submit defences to possession claims. Increased capacity within the legal advocacy sector will therefore be necessary to ensure that renters are able to exercise their rights in practice.

- Robust local authority enforcement will support compliance with the Act. In Safer Renting's experience, where landlords are reported using the GLA's 'Report a Rogue' tool, a response from the local authority is prompted. The tool is not commonly known among renters, but if its remit is expanded to encourage reporting on the new set of breaches and offences in the RRA and the tool is effectively promoted, it could be a vital route for Londoners to access local authority enforcement teams where breaches of the act are identified.

### **3. What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

- Among the local authorities with which we work, enforcement teams and homelessness prevention teams often do not operate within close or established working relationships. Effective implementation of the Renters' Rights Act would be supported by clear agreements defining respective roles and responsibilities, to ensure that breaches and offences under landlord legislation are consistently identified and enforced. Where such relationships are not already in place, local authorities may face practical challenges, including limited coordination and reluctance to share budgets for joint activity, which may undermine effective enforcement.
- Since the cuts to tenancy relations services, and the shift of homelessness teams towards dealing with the admin associated with part 7 application and regulatory teams towards licensing schemes, there has been a significant loss of expertise in landlord and tenant law across teams responsible for housing advice and regulatory enforcement.
- Local authority homelessness services and private sector housing regulatory teams do not operate shared IT systems that would enable the consistent recording and exchange of information about landlords who may have breached housing legislation, both within and across local authorities.
- Local authorities in London report insufficient capacity to implement the Renters' Rights Act effectively. None of the London authorities with which we are currently working have developed plans for proactive enforcement of the Act. Where implementation planning is underway, it is largely focused on reactive enforcement. We are aware of only one authority, the London Borough of Newham, that has outlined proposals for proactive prevention work, including the development of a court-based prevention officer role.

### **4. Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act? 7 MHCLG (2025), 'Guide to the Renters' Rights Act'.**

- It is widely recognised that local authorities currently face significant capacity constraints, and that implementation of the Renters' Rights Act will therefore present substantial challenges. However, additional resources and levers are available which, if deployed effectively, could place local authorities in a stronger position to monitor

and enforce the new measures. An early focus on appropriate training, clear strategies, and internal policies to support joint working across departments would help to increase income through the use of civil penalty notices, reduce levels of homelessness, and mitigate the risk of legal challenge arising from a failure to discharge new statutory enforcement duties. Where local authorities do not treat this as an immediate priority, they risk a relative and ongoing reduction in capacity compared with authorities that do.

- As noted above, the London local authorities with which we work are unlikely to develop sufficient capacity to undertake proactive enforcement independently. By contrast, Safer Renting works with Safe Suffolk Renters, which coordinates enforcement activity across Suffolk local authorities and is developing a shared enforcement role to operate as a pooled resource, enabling proactive enforcement of breaches of landlord legislation.
- Effective enforcement of criminal offences such as illegal eviction and harassment requires cooperation between the police and local authorities. At present, police responses to reports of illegal eviction and harassment are poor. We would welcome the Mayor's Office for Policing and Crime (MOPAC) monitoring and evaluating police responses and cooperation with local authority investigations, including assessment of:
  - The number of calls received relating to eviction and harassment;
  - The frequency of in-person attendance;
  - Actions taken by officers; and levels of cooperation with local authority investigations.

#### **5. How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

- 

#### **6. How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

London local authorities would benefit from the creation of shared resources which would enable the prevention of homelessness and proactive enforcement of the Renters Rights Act. These jointly funded services, and/or job roles, could include:

- Additional advisory support at court.
- Support for renters to carry out s13 rent challenges
- Data collection on:
  - landlords that have re-let properties within the prohibited period (after using no fault possession grounds);
  - discrimination against renters on benefits or with children;
  - landlord or agents that let properties above advertised rent.
  - This information can then be fed back to local authorities to enable enforcement.

#### **7. How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

Safer Renting works with renters in the lower end of the market who are subject to exploitation by criminal landlords. Many of these landlords seek to evade existing regulation. For this reason, it would be useful to publicise new enforcement powers and the sanctions landlords will face should they continue to act criminally. Criminal landlords are unlikely to attend local landlord forums or review legal blogs, focus should therefore shift to channels where they will more likely receive it, such as social media.

### **8. What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

Criminal landlords and letting agents that continue to break regulation should have their access to the market restricted, we recommend that local authorities adopt the use of interim and final management orders to ensure that tenants are protected through this process. We suggest that social lettings agencies such as 'Good Place Lettings' may act as a resource for the management of properties subject to interim and final management orders.

It is also reported that landlords are concerned that they will be unable to comply with the new regulations and may choose to sell their properties to manage the risk. While we have not observed this happening in practice, we again suggest that the services of social lettings agencies are promoted to landlords who may wish to comply with the regulation, but do not feel equipped to do so independently. Operators such as good place lettings could support landlords to manage their properties within the regulations and encourage landlords to reserve properties for renters subject to the London housing allowance.

## Call for Evidence: Implementing and monitoring the Renters' Rights Act in London

### By the TDS Charitable Foundation

#### 1.0 About the TDS Charitable Foundation

- 1.1 The TDS Charitable Foundation works to improve standards in the private rented sector by advancing education about housing rights and obligations, commissioning research and encouraging the use of alternative dispute resolution for more efficient and effective resolution of disputes between landlords and tenants.
- 1.2 It is funded mainly by donations from The Dispute Service, the leading Tenancy Deposit Scheme which operates on a non-profit basis across the UK.
- 1.3 This submission draws heavily on findings from the TDS Charitable Foundation's 'Voice of the Tenant'<sup>1</sup> and 'Voice of the Landlord'<sup>2</sup> 2025 surveys. These national, representative surveys, conducted annually, examine the experiences of over 2,000 tenants and 2,000 landlords in the English private rented sector (PRS). London represents the largest regional private rental market in England: one quarter of all private rented properties are in London. References to London tenants in this submission are based on a sample of 599 landlords and 475 tenants living in the Greater London area.
- 1.4 The submission also refers to findings from the TDS Charitable Foundation's 'Tenant Awareness Around the Renters' Rights Act' Survey<sup>3</sup>, which surveyed over 1,000 tenants, including 236 based in Greater London.

#### 2.0 Executive summary

The Renters' Rights Act introduces significant reforms to London's private rented sector (PRS), aiming to enhance tenant security, professionalise landlord practices, and improve property standards. Success of the Act will be measured by changes in tenant experiences, landlord behaviour, and property conditions. For example, higher rates of tenants escalating their complaints to local authorities or redress schemes, improvements in property conditions, and landlord compliance with new legal obligations. It is also crucial to monitor potential unintended consequences, such as increased barriers to accessing the PRS for disadvantaged groups.

- 2.1 Removing Section 21 alone will not automatically empower tenants to challenge issues or unfair rents; doing so requires awareness of enforcement routes and confidence to use them. Nearly two-thirds of tenants' reported they experienced problems with the

---

<sup>1</sup> TDS Charitable Foundation (June 2025), *Living in the Private Rented Sector in 2025 The Voice of the Tenant Survey Wave 5*. Available [here](#).

<sup>2</sup> TDS Charitable Foundation (July 2025) *Living in the Private Rented Sector in 2025 The Voice of the Landlord Survey Wave 2* Available [here](#).

<sup>3</sup> TDS Charitable Foundation (November 2025), *Tenant Awareness Around the Renters' Rights Act*. Available [here](#).

quality or condition of their property in the past six months, but only 18% escalated complaints about unresolved issues. Tenant awareness of the Act is also low, with 65% of London tenants unfamiliar with its implications. These findings show that legal reform must be accompanied by tenant education and guidance to ensure improved security leads to better living conditions. We encourage the Mayor to endorse the TDS Charitable Foundation's *My Housing Issue Gateway*, which is a free online interactive and diagnostic tool that signposts tenants to the appropriate forum for making complaints.

- 2.2 Measures to limit rent in advance and prohibit rental bidding are particularly relevant in London, where these practices are more prevalent. While they may reduce financial pressure on tenants, they risk disadvantaging groups perceived by landlords as higher risk, including those with poor credit history, benefit recipients and international students. Monitoring access to the PRS for these groups will be critical.
- 2.3 Local authorities face significant challenges in enforcing the Act, including low tenant awareness about reporting landlord non-compliance, limited landlord understanding of new obligations, and sustained funding and staffing pressures. While the forthcoming PRS Database could improve enforcement and compliance, it will not be fully operational until 2028, highlighting the need for interim support.
- 2.4 The Mayor can play a critical role by assessing local authorities' enforcement capacity to identify resourcing needs and advocating for the Government to provide adequate, ring-fenced funding and an enforcement-led PRS Database. The Mayor should also support coordinated education campaigns for renters and landlords, including promoting the *My Housing Issue Gateway* as a resource for private renters on the GLA website.
- 2.5 The impact of the Act on PRS supply must also be carefully monitored. While evidence does not suggest an immediate mass exit of landlords, regulatory and tax changes influence landlord decisions about selling property. There are emerging risks at the affordable end of the market; landlords letting to benefit recipients or accepting placements from local authorities are selling properties at disproportionately high rates.

### 3.0 **What will change for private renters and landlords in London due to the measures introduced by the Renters' Rights Act, and how will it be possible to measure their success?**

- 3.1 The Renters' Rights Act will bring far-reaching changes for both private renters and landlords. The Act is intended to improve tenant security, professionalise landlord practice and raise property standards. The TDS Charitable Foundation welcomes the introduction of the Act and the Government's commitment to improving the private rented sector.
- 3.2 **Its success in London can be measured through changes in tenant experiences and landlord behaviour. However, evaluating the policy must also involve identifying and minimising unintended consequences, such as potential barriers to accessing the PRS for disadvantaged groups.**

### 3.3 **Abolition of Section 21**

This measure is intended to provide tenants with greater security and to empower them to challenge poor conditions and unfair practices without fear of retaliatory eviction.

### 3.4 **Our Voice of the Tenant survey shows that a significant proportion of tenants in the sector feel insecure and that the removal of Section 21 will play an important role in addressing this.**

In 2025, 73% of tenants agreed with the statement “I feel secure in my home”, whilst 27% either disagreed or were unsure. In 2024, 42% of tenants reported worrying that they could be asked to leave their homes at any time.

### 3.5 **Our latest survey found that nearly two-thirds (64%) of tenants nationwide experienced a problem with the condition of their property. However, when these issues were not resolved, only 18% of tenants escalated their complaint to a local authority or redress scheme. Whilst the main barriers were fear of retaliatory eviction (31%) and rent increases (25%), we also found that 40% were unsure of where to go to make a complaint.** In addition, tenant awareness and understanding of the Renters’ Rights Act remains poor (see further details in our response to Question 5).

### 3.6 **If the Act was successful, over time, we should see a higher proportion of tenants escalating their complaint to their local authority, redress scheme or Tribunal after Section 21 is abolished and new restrictions on rent increases take effect. However, this outcome depends heavily on tenant awareness and understanding of how to exercise their rights. There is currently a misconception that removing Section 21 will automatically empower tenants to challenge poor practices or unfair rent increases.**

### 3.7 **Even if renters feel more empowered and secure following the removal of Section 21, limited awareness of rights and routes to redress will likely continue to pose a barrier.**

**The existing redress landscape in the private rented sector is also complex and confusing. There are several places a person might go to resolve a housing issue,** including: local councils, ombudsman schemes, various licensing schemes, county courts, tribunals, deposit adjudication services and trading standards. It also varies depending on whether you are renting privately from a landlord or from a letting agent.

**Navigating these diverse processes can be challenging for tenants,** which is further exacerbated by a lack of clarity about rights and entitlements.<sup>4</sup>

### 3.8 **A comprehensive tenant education campaign and endorsement of the TDS Charitable Foundation’s *My Housing Issue Gateway* is therefore essential to ensure that renters are knowledgeable, confident and able to exercise their rights in practice.** The Gateway serves as a signposting and diagnostic tool to help

---

<sup>4</sup> JUSTICE (2020), *Solving housing disputes*. Available [here](#).

tenants identify the correct dispute resolution mechanism for making a complaint when necessary.

- 3.9 Landlord behaviour will also be a key indicator of success. Our landlord survey shows that practices which will become unlawful under the Act are currently common: 27% of landlords nationally reported ending a tenancy because a tenant “complained too much”, and 16% to re-let the property at a higher rent.
- 3.10 These behaviours should reduce following implementation, but only if landlords are adequately informed and supported to understand and comply with their new legal obligations (see more details in our response to Question 5).

### **3.11 Limiting rent in advance and ending rental bidding**

The Act’s restrictions on rent in advance and the prohibition of rental bidding are designed to curb practices that place excessive financial strain on tenants.

**Our research shows that affordability pressures are particularly acute in London. 46% of tenants here report cutting their spending on essential items to pay rent.** 16% of all Greater London tenants also report being in rent arrears, compared to 12% of tenants nationwide. Amongst these, London (as well as the Midlands) has the highest numbers of tenants who are over 6 months in arrears, at 2% of all tenants. Greater London tenants were also the likeliest in the country to report that their rent had been increased in the past 12 months – 61% of them reported this, compared to a 57% national average.

- 3.12 **Our Voice of the Landlord survey shows that practices associated with rent in advance, requesting Rent Guarantors, and rental bidding are particularly prevalent in London.** Nearly one-third of landlords in Greater London (31%) reported receiving rental bids over the asking price, compared with 21% nationally.
- 3.13 Similarly, tenants in Greater London are more likely to report being asked for rent in advance as a challenge when searching for a home (21% compared with 17% nationwide). A further 9% report challenges in securing a UK Guarantor.
- 3.14 The data likewise indicates that 39% of London-based landlords request a Rent Guarantor, significantly more than the 29% of landlords nationwide who do this.
- 3.15 **The Act may reduce the prevalence of asking for more than a month’s rent in advance, but it is important to monitor unintended consequences. Limiting rent in advance to one month may disadvantage tenants perceived by landlords as higher risk if landlords become less willing to rent to them,** particularly those with poor credit histories, benefit recipients, and international students. Similarly, tenants who cannot provide a Rent Guarantor will face exacerbated access challenges if this becomes a more common risk mitigation strategy among landlords.

Tenants in London already struggle disproportionately to find accommodation, with 57% of them saying they found it difficult or very difficult, compared to 52% of

tenants nationwide. Similarly, 22% of London tenants say they had to view 6 or more properties before they found new accommodation, compared to only 17% of tenants nationwide.

Access to the PRS, particularly among these groups perceived by landlords as higher risk, should be closely monitored to ensure the measures do not exacerbate exclusion.

**3.16 Although these reforms address some practices that contribute to affordability challenges in the sector, the extent to which the Act addresses affordability is limited. Increasing the supply of social and affordable homes and unfreezing Local Housing Allowance (LHA) rates would have a greater impact on affordability in the longer term.**

### **3.17 Challenging rental increases**

The Renters' Rights Act will empower private rented tenants to challenge unreasonable rent increases at the First-tier Tribunal. The Tribunal will no longer be able to increase rent beyond what the landlord initially proposed, and the new rent will apply from the date of the Tribunal determination (not backdated). This is intended to prevent landlords from using rent increases as a means of "backdoor eviction".

**Five years after similar reforms were introduced in Scotland's private rented sector, a new report found that although rents are becoming increasingly expensive, less than 1% of tenants had used the new powers to formally challenge unfair rent increases.<sup>5</sup> This indicates that tenants are either unaware of or unable to access the process. It is essential that the same mistake is not made in England.**

**Endorsement and promotion of the *My Housing Issue Gateway* is important, to ensure the Act achieves its goals of empowering tenants to raise complaints and challenge unfair rent increases.** By supporting those tenants able to self-help, this tool in turn frees up capacity for advice and support agencies to assist those who may be more vulnerable or facing more complex issues.

### **3.18 Prohibiting rental discrimination**

The Renters' Rights Act aims to prohibit discrimination against families with children and people in receipt of benefits.

**3.19 Our Voice of the Tenant survey indicates that both families and people in receipt of benefits currently face disproportionate barriers when accessing the PRS:**

- 80% of tenants with children nationwide experienced at least one challenge when searching for their most recent rental home, compared with 70% of tenants overall
- 76% of tenants receiving benefits experienced at least one challenge, again compared with 70% of tenants overall

---

<sup>5</sup> Indigo House & Nationwide Foundation (2024), *Rent Better – Research on the impact of changes to the private rented sector tenancy regime in Scotland, final report*. Available [here](#).

3.20 **Tenants with children were more than twice as likely to be told a landlord or agent did not want to let to them, while tenants receiving benefits were more than three times as likely to experience the same.** However, this does not in itself confirm discrimination, as landlords may base their decisions on property size, suitability or affordability.

3.21 A reduction in the proportion of tenants with children or in receipt of benefits who report challenges when searching for a rental or being refused by landlords would indicate progress following implementation of the Act. However, the measures in the Act may be insufficient in addressing the range of barriers these groups of tenants face.

When landlords were asked why they felt unable to let to tenants receiving benefits, 71% cited perceived financial risk, and almost half pointed directly to the gap between LHA rates and market rents.

3.22 **Frozen LHA rates therefore pose a significant challenge to the effectiveness of the Act's and risk undermining its objective of improving access to the PRS for benefit recipients.**

### 3.23 **Improving property conditions**

The Act also aims to improve housing quality by extending the Decent Homes Standard to the PRS and strengthening enforcement through Awaab's Law, including clear timelines for repairs.

3.24 In Greater London, 54% of tenants currently rate their property as "good" or "extremely good", 35% as "acceptable", and 11% as "poor" or "extremely poor", broadly in line with national averages. **If the Act is effective, the proportion of tenants reporting good conditions should increase, while reports of poor conditions should decline.**

3.25 **It is particularly important to track outcomes for groups currently experiencing worse conditions. For example, tenants who are not working due to long-term sickness or disability** are significantly more likely to report serious damp or mould problems (35%, compared with a national average of 18%). This group is particularly vulnerable to the health impacts of damp and mould, making targeted monitoring important to prevent widening health inequalities and to ensure the Act raises standards.

## 4.0 **What support do private renters need to help them benefit from the measures contained in the Renters' Rights Act?**

4.1 Awareness and education are vital to ensure tenants understand how their rights are changing and how to exercise these new rights.

- 4.2 Our survey on tenant awareness of the Renters' Rights Act<sup>6</sup> found that **65% of London tenants either had not heard of the Act or did not understand its implications**. While slightly better than the national average of 69%, this indicates a significant gap in knowledge of changes that could transform their security and confidence in the market.
- 4.3 Encouragingly, 90% of London tenants expressed a desire for more information about how the Act affects them (higher than the national average of 82%).
- 4.4 Preferred formats for receiving guidance included:
- 41% want short, written guides on a dedicated website
  - 31% would like email newsletters
  - 29% favour video content such as YouTube animations
  - 22% chose Instagram posts or reels
  - 21% prefer printed leaflets
- 4.5 **To address this urgent need for more information, the TDS Charitable Foundation is partnering with Crisis to produce joint guidance for renters, available from 1 May 2026.** Resources will include written and video explanations of the Act and practical advice on exercising new rights.
- 4.6 **The TDS Charitable Foundation has also developed the *My Housing Issue Gateway*, a free online interactive tool that signposts tenants to the appropriate forum for making complaints.** This addresses widespread confusion: 40% of private tenants nationwide reported not knowing where to go to escalate unresolved housing problems. Many of those who thought they knew cited informal or inappropriate sources, such as family, government websites or local MPs, rather than councils or recognised redress schemes.
- 4.7 **Promoting the *My Housing Issue Gateway* can empower tenants, improve awareness and ensure they fully benefit from the protections introduced by the Act.** This could feature as a resource for private renters on [this page](#) of the GLA's website.

## 5.0 **What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

Local authorities are likely to face several challenges in monitoring and enforcing the measures introduced by the Renters' Rights Act, including:

- Limited tenant awareness about reporting landlord non-compliance
- Significant funding and staffing pressures within councils

---

<sup>6</sup> TDS Charitable Foundation (November 2025), *Tenant Awareness Around the Renters' Rights Act*. Available [here](#).

- Low levels of landlord understanding of new legal obligations

### 5.1 **Limited tenant awareness about reporting landlord non-compliance**

A lack of tenant awareness is likely to hinder effective monitoring and enforcement. Our Voice of the Tenant survey shows that **39% of London tenants do not know where to seek help to resolve housing issues, limiting the ability of local authorities to identify and respond to non-compliance.**

**Tenants currently have several potential routes to resolve housing issues**, including: local councils, ombudsman schemes, various licensing schemes, county courts, tribunals, deposit adjudication services and trading standards. Each of these entities has different responsibilities and covers different parts of the sector, leaving **much of the responsibility on the tenant to identify the appropriate authority for their issue and where to raise their complaint.**

Whilst welcomed by the TDS Charitable Foundation, reforms such as the introduction of a Decent Homes Standard and the creation of a new Ombudsman, which private landlords must join to improve tenant access to redress, risk adding to the existing complexity.

- 5.2 Awareness is particularly low among younger tenants and recent migrants, who are less familiar with council enforcement powers and ombudsman schemes.<sup>7</sup>
- 5.3 The forthcoming Private Rented Sector Database will enable local authorities to take a more proactive approach to identifying non-compliance. However, it is not expected to be fully operational until as late as 2028, well after several of the provisions come into effect.
- 5.4 In the interim, tools like **the *My Housing Issue Gateway* can play an important role by directing tenants to the most appropriate route for raising and escalating housing complaints.**

### 5.5 **Council funding and staffing pressures**

Even when tenants are correctly referred to their local authority, **our research<sup>8</sup> illustrates the consequences of council's enforcement capacity being under considerable strain. Tenants reported long delays before receiving responses to complaints, with some receiving no response at all.** In some cases, councils failed to carry out inspections despite ongoing hazardous conditions.

- 5.6 Where inspections or improvement notices were issued, follow-up enforcement was sometimes inadequate. We heard stories from tenants where councils did not act

---

<sup>7</sup> TDS Charitable Foundation (2025), *Resolving Tenancy Issues: Barriers to Dispute Resolution for Private Tenants*. Available [here](#).

<sup>8</sup> TDS Charitable Foundation (2025), *Resolving Tenancy Issues: Barriers to Dispute Resolution for Private Tenants*. Available [here](#).

when landlords failed to comply with notices, or that responsibility for resolving issues was placed largely on tenants, with limited practical support.

5.7 There were also cases where councils appeared reluctant to take enforcement action due to wider housing supply pressures. In one case, a tenant was advised to remain in an uninhabitable property because no alternative accommodation was available. The landlord completed only part of the required remedial work, and no further enforcement action was taken.

5.8 Other research funded by the TDS Charitable Foundation, revealed significant variation in council enforcement activities.<sup>9</sup> Whilst this research did highlight several examples of good practice associated with enforcement and encouraging compliance, light-touch approaches based on reactive, and limited use of formal powers appeared to be relatively common.

Other research carried out in London has shown that local authority enforcement action did not necessarily deter criminal behaviour, and that tenants often felt unprotected by statutory services.<sup>10</sup>

5.9 **Delays, weak follow-up, and poor communication undermine tenant confidence in the enforcement system and allow substandard conditions to persist. Without adequate resourcing and capacity, the Act risks falling short of its objective to raise housing standards in the private rented sector.**

5.10 **Supply pressures**

Many councils, particularly in London, rely on the private rented sector to fulfil their statutory homelessness duties. There may be a reluctance to enforce the new legislation if it is perceived to negatively impact supply in an already highly constrained housing market (see below).

22% of London tenants reported attending six or more property-viewings before they secured one (versus 17% of tenants countrywide), and 57% of London tenants described the property-hunting process as difficult or very difficult (versus 52% countrywide). These figures show that tenants everywhere face barriers to housing access, but due to the limited supply of homes and other factors, London tenants face these disproportionately.

5.11 **Limited landlord awareness of new obligations**

Effective implementation also relies on landlords understanding and complying with their new legal responsibilities. **Our Voice of the Landlord survey shows that around one in five London landlords struggle to keep up with changes in rental legislation, while over half feel that changes to laws and regulations are not clearly communicated.**

---

<sup>9</sup> Harris, J., Cowan, D. and Marsh, A. (2020) Improving compliance and enforcement in the private rented sector. (CaCHE) Available [here](#).

<sup>10</sup> Safer Renting (June 2020), *Journeys in the shadow private rented sector*, Available [here](#).

- 5.12 This challenge is particularly acute among small landlords. Around 43% of landlords own only a single property, and many let homes alongside other employment. Research suggests that inadvertent non-compliance among small-scale landlords is a key enforcement challenge for local authorities in the private rented sector.<sup>11</sup> This type of non-compliance requires a different response to intentional criminal activity.
- 5.13 The Private Rented Sector Database has the potential to become a valuable tool for informing and educating landlords about their obligations. However, given that it will not be fully operational until well after the new tenancy structure and other key provisions under the Act come into force, **a comprehensive and well-designed interim landlord education campaign is essential to support compliance and reduce avoidable breaches of the new rules.**

## 6.0 **Do local authorities in London have the capacity and resources they need to monitor and enforce the measures introduced by the Renters' Rights Act?**

While we do not have London-specific data on enforcement capacity and resourcing, evidence presented in response to Question 5 indicates widespread funding and staffing pressures across local authorities nationwide.

### 6.1 **However, it is likely that London councils face exacerbated pressures in tackling criminal behaviour in the sector. As explored in research funded by Safer Renting.<sup>12</sup>**

Evidence by Safer Renting indicates that several factors in London contributes to heightened PRS-related criminal activity. In the capital high rents often outstrip property standards, while intense market pressures encourage tenants to tolerate overcrowded living conditions.

A growing population of economic migrants, combined with reduced enforcement capacity, a complex legal framework, limited support for tenants pursuing legal remedies, low penalties for convicted offenders, and the increasing use of online platforms where identities are difficult to verify, has further exacerbated these risks.

## 7.0 **How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

The Renters' Rights Act will support the Mayor's Private Rented Sector Partnership, manifesto commitments, and wider work to provide safe and decent homes for Londoners in three key ways:

---

<sup>11</sup> Harris, J., Cowan, D. and Marsh, A. (2020) Improving compliance and enforcement in the private rented sector. (CaCHE) Available [here](#).

<sup>12</sup> Safer Renting (June 2020), *Journeys in the shadow private rented sector*, Available [here](#).

### 7.1 **Improving standards**

**The introduction of the Decent Homes Standard and Awaab's Law has the potential to significantly improve conditions in London's private rented sector. Realising these benefits will depend on consistent enforcement, tenant confidence to report poor conditions, and effective support for landlords to understand and comply with their new legal obligations, as set out in our response to Question 5.**

### 7.2 **Strengthening enforcement**

**The new PRS Database will enable London boroughs to better identify and track landlord compliance, allowing them to target enforcement activity more effectively towards non-compliant and unsafe properties.** It will also support boroughs in communicating with landlords and improving understanding of legal requirements across the sector. Our recommendations for maximising the effectiveness of the PRS Database are outlined in our response to Question 8.

### 7.3 **Tackling affordability**

**The Act introduces some measures to address affordability pressures, including banning rental bidding and limiting rent increases to once per year. However, these measures alone will not be sufficient to meaningfully improve affordability in London's PRS. Progress will depend on increasing the supply of social and genuinely affordable housing and unfreezing Local Housing Allowance rates so that low-income households can access and sustain tenancies in the PRS.**

## 8.0 **How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

To support effective implementation and enforcement of the Renters' Rights Act, the Mayor should work with Government to increase local authority enforcement resources, advocating for improved improving coordination across enforcement bodies, and maximising the value of the Private Rented Sector (PRS) Database.

### 8.1 **Address enforcement capacity and resourcing**

The Mayor should:

- **Conduct a London-wide assessment of local authority capacity to enforce PRS regulations and identify additional resourcing required.**
- **Advocate for adequate and ring-fenced funding allocations linked to the size of the local PRS to reflect differing enforcement burdens, as proposed by the Chartered Institute of Environmental Health (CIEH)<sup>13</sup>.**

---

<sup>13</sup> Chartered Institute of Environmental Health (CIEH) (August 2025), *Written evidence submitted to the HCLG inquiry into housing conditions in England*. Available [here](#).

- Press government to clearly map and publish the roles and responsibilities of all PRS enforcement bodies to improve transparency for tenants and landlords.

## 8.2 **Advocate the Government for an enforcement-led PRS Database**

**The Mayor should advocate for a robust, enforcement-led design of the PRS Database, informed by lessons from devolved administrations where landlord registration schemes have suffered from low registration rates and weak enforcement.**

8.3 To maximise effectiveness, the Database should:

- Have clear aims: preventing criminal landlords from operating and reducing inadvertent non-compliance through landlord education.
- Use Unique Property Reference Numbers (UPRNs) to verify entries and enable automated checks of compliance documents via API-based systems.
- Record actual rents paid, supporting fair rent assessments, rent challenge evidence, and market transparency.
- Require annual reporting of property size and rent levels to strengthen evidence for Local Housing Allowance setting.
- Include tenancy deposit certification details to improve compliance with existing legislation.
- Clarify how the Database will interact with selective licensing schemes to avoid duplication and unnecessary burdens.

## 8.4 **How to monitor the impact on Londoners**

**The impact of the Renters' Rights Act can be assessed through changes in London tenant experiences and landlord behaviour as explored within our surveys, as well as by identifying unintended consequences, such as barriers to accessing the PRS for disadvantaged groups.**

8.5 London-specific data can be collected through our annual Voice of the Landlord and Voice of the Tenant surveys, focusing on the following key indicators:

### 8.6 **Tenant experiences:**

- Do tenants report feeling more secure from eviction?
- Are more tenants:
  - Reporting repairs
  - Escalating complaints to the appropriate forum
- Are tenants with children or those receiving benefits experiencing lower levels of discrimination when accessing properties?
- Are groups considered financially higher risk (e.g., tenants with poor credit, benefit recipients, international students) finding it easier or harder to access suitable properties?

- Are tenants reporting improvements in property conditions?
- Are levels of rent arrears changing?
- Are rental guarantor requirements increasingly being reported by tenants as a barrier to access?
- Are outcomes consistent across:
  - Different London councils
  - Vulnerable tenants
  - Tenants with language or accessibility needs?

### **8.7 Landlord behaviour:**

- Are landlords aware of and complying with their new obligations, such as limits on rent in advance?
- Are more landlords increasing rent?
- Are more landlords proactively inspecting the condition of their properties?
- Are more landlords using letting agents?
- Are more landlords allowing renters to have pets?
- How are landlord practices around rental guarantor, rent in advance, and selecting tenants changing over time?

These questions will provide robust, London-specific evidence on the impact of the Act and highlight areas requiring further support or intervention.

- 8.8 The impact of the Act on local authority enforcement could also be monitored using the following data:

#### **Council activities and experiences:**

- Number of inspections carried out and enforcement activities
- Training completed on duties and new powers
- Enforcement capacity across the council
- Confidence among councils in using the new powers
- Number and type of complaints received
- Aggregated enforcement data from across the capital

### **9.0 How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

- 9.1 The Mayor can strengthen renter and landlord understanding of the Renters' Rights Act through coordinated, well-resourced education and communication activity across London.

- 9.2 **The Mayor should endorse and promote the *My Housing Issue Gateway*, which supports tenants to understand their rights and navigate the appropriate routes for**

**raising housing issues.** Promoting this tool would strengthen awareness and support effective use of the new rights introduced by the Act.

- 9.3 **The Mayor should work with the Government to ensure that local authorities are adequately funded to deliver educational activities and encourage them to work with trusted intermediaries to reach landlords and tenants.** This might include letting agents, tenancy deposit schemes, landlord bodies, tenant organisations, and advice and voluntary sector providers.
- 9.4 Findings from our tenant awareness research<sup>14</sup> indicate that **43% of London-based participants were most likely to have encountered information about the Act through mainstream news and 40% from social media. Those exposed via news media were significantly more likely to report understanding the reforms.**
- 9.5 Information provided directly by landlords or letting agents, while less common (15%), was also strongly associated with higher levels of understanding, indicating the important role these actors can play in tenant education.
- 9.6 London tenants were more likely than the national average to receive information from tenant groups, charities, or advice services (13% versus 9%), making these channels more commonly used in the capital.
- 9.7 Preferred formats for receiving guidance included:
- 41% want short, written guides on a dedicated website
  - 31% would like email newsletters
  - 29% favour video content such as YouTube animations
  - 22% chose Instagram posts or reels
  - 21% prefer printed leaflets

## **10.0 What impact will the Renters' Rights Act have on the supply of rental properties, and how can this be monitored?**

**Our data, the CENSUS and the English Housing Survey suggests that the overall size of the private rented sector (PRS) in England is remaining broadly stable, with slightly more landlords adding to their portfolios than selling properties.**

**In Greater London, 37% of landlords added properties in 2024–25, compared with 17% who sold properties** (whilst the national average was 23% and 14% respectively). However, data based on market level listings and transactions, found

---

<sup>14</sup> TDS Charitable Foundation (November 2025), *Tenant Awareness Around the Renters' Rights Act*. Available [here](#).

a 41% reduction in the number of London properties available for private rent since the Covid-19 pandemic.<sup>15</sup>

- 10.1 More landlords buying property rather than selling does **not guarantee a net increase** in total rental stock, if for example, larger portfolios are selling off stock while smaller landlords buy a property back. The data shows that most sales nationally (39%) are to owner-occupiers, whilst only 31% of sold properties remain in the PRS, and a further 12% of sold properties move to the social/affordable housing sector, and 8% become short-term 'Airbnb' type lets. This may have a negative effect on the PRS overall. [Unfortunately we do not have London-specific data for this question, only nationwide.]
- 10.2 **While we do not anticipate a mass landlord exit from the sector, our national landlord survey indicates that cumulative tax and regulatory changes do influence landlord decisions about portfolio acquisitions and sales.** According to the Voice of the Landlord survey, 54% of landlords who sold properties in 2024–25 cited “proposed regulatory changes” as a contributing factor, while more than 40% pointed to “changes to tax regimes”.
- 10.3 There is, however, a concerning national trend among landlords operating at the affordable end of the market. **Landlords letting to tenants in receipt of benefits are selling properties at a significantly higher rate than average.** For example, 20% of landlords in the housing benefits market sold one or more properties in 2024; by 2025 this figure had risen to 37% (20% higher than the national average of 17%).
- 10.4 The rate is higher still among landlords accepting placements from the local authority (including homeless households), where 44% reported selling properties. Although London-specific data is not available, **this trend underlines the importance of monitoring the size of the housing benefits market and those landlords letting to councils in London’s PRS to protect the supply of affordable housing for low-income tenants.**
- 10.5 **The Renters’ Rights Act will require some landlords to finance property upgrades, which is likely to pose challenges at the affordable end of the market.** Costs are often higher for older or less energy-efficient properties, while landlords’ ability to recoup investment through rent increases is constrained by tenants’ low incomes.
- 10.6 Our Voice of the Landlord survey shows a clear correlation between landlord income and investment in property quality, particularly energy efficiency. For instance, 81% of landlords with incomes above £100,000 reported making energy efficiency improvements, compared with just 44% of landlords earning £24,999 or less. This disparity is likely to influence decisions on whether to continue letting or to exit the sector, potentially reducing the supply of homes affordable to lower-income tenants.

---

<sup>15</sup> Savills Residential Research Report for London Councils and Trust for London (2024), *Private rented housing supply in London*. Available [here](#).

- 10.7 To support landlord confidence, the Government has introduced green loans and grant funding for energy efficiency improvements under the Warm Homes Plan, alongside incremental reductions in the spending cap for homes valued under £100,000. **While the availability of funding is welcome, existing research suggests uptake among landlords and tenants remains lower than expected.**<sup>16</sup> TDS is currently investigating the barriers to engagement with these funding schemes and how they could be improved. Findings will be published in March 2026.
- 10.8 **In conclusion, the overall size of the PRS remains stable but the impact of the Renters' Rights Act may disproportionately affect landlords operating in the affordable segment of the market. Without targeted support and effective take-up of existing funding schemes, there is a risk of further contraction in the supply of homes available to lower-income tenants.** Ongoing monitoring and policy refinement is essential to safeguard both landlord confidence and access to affordable private rented housing.

6 February 2026

---

<sup>16</sup> National Retrofit Hub (February 2025), *Raising Standards in the Private Rental Sector: A Pathway to Equitable and Effective Retrofit*. Available [here](#).

## **Z2K's response to the London Assembly Housing Committee's investigation – Implementing and monitoring the Renters' Rights Act in London**

1. Z2K is an anti-poverty charity working to end UK poverty through providing expert frontline advice and representation services and campaigning for change.
2. Our advice services support people living on low incomes across London with housing problems including rent affordability, eviction, homelessness and social housing applications. Around one in four (23%) of our clients are private renters.
3. Alongside our frontline advice work, Z2K campaigns and publishes research on the private rented sector. We are a member of the Renters Reform Coalition that campaigned for the introduction of the Renters' Rights Act. We publish research on the private rented sector, including our 2025 co-produced renters' manifesto [\*Decent Homes, Affordable Rents\*](#), which was developed with a steering group of low-income renters living in the Westminster City Council area.

### **What will be the main challenges for local authorities in London in monitoring and enforcing the measures introduced by the Renters' Rights Act?**

4. Local authorities have a crucial role to play when it comes to enforcing the Renters' Rights Act. They have been given a key enforcement role in the new tenancy system that is being introduced through the abolition of section 21. They will also enforce the Act's measures relating to letting practices, including the bans on bidding and 'no DSS' discrimination and the limit on rent in advance. The Act also gives local authority enforcement services new investigatory powers, expands civil penalties, makes it easier for them to pursue rent repayment orders and requires them to report on enforcement activity.
5. The Local Government Association has warned that skills shortages and funding shortfalls are likely to pose significant challenges for local authorities

when it comes to enforcing the Act.<sup>1</sup> Another key barrier is poor awareness of local authority enforcement services, and the barriers that renters face when it comes to accessing them. Because the new system relies on renters identifying problems and reporting them, if they are not addressed these barriers will significantly hamper local authorities' efforts in enforcing the Act.

6. Z2K carried out analysis of Westminster City Council's private rented sector (PRS) enforcement services as part of our *Decent Homes, Affordable Rents* manifesto. Our survey found that nearly half of renters in the borough were unaware that the council offered support for PRS tenants. Other renters reported that they had difficulty contacting enforcement services because the council did not provide a phone number, only an online form, which created digital access barriers and deterred them from seeking informal advice.<sup>2</sup> One in ten Londoners are digitally excluded.<sup>3</sup> In preparing for the rollout of the Act, local authorities should take action to ensure that their PRS enforcement services are available and accessible.

**Recommendation: Local authorities should raise awareness of their PRS enforcement services in preparation for the rollout of the Act.**

**Recommendation: Local authorities should ensure that their PRS enforcement services are accessible to renters, including providing a phone number.**

7. While it is widely expected that the abolition of section 21 'no-fault' evictions will reduce the overall rate of homelessness presentations from the private rented sector, the new tenancy regime will nonetheless present new challenges for local authority homelessness services.

---

<sup>1</sup> Local Government Association, 2025. *Renters' Rights Bill, Committee Stage, House of Lords, 22 April 2025*. [online] Local Government Association. Available at: <https://www.local.gov.uk/parliament/briefings-and-responses/renters-rights-bill-committee-stage-house-lords-22-april-2025>

<sup>2</sup> Z2K, 2025. *Decent Homes, Affordable Rents: A Private Renters' Manifesto for the City of Westminster*. [online] Z2K. Available at: <https://z2k.org/decent-homes-affordable-rents/>

<sup>3</sup> Greater London Authority (2025) *Helping people get online*. Available at: <https://www.london.gov.uk/programmes-strategies/communities-and-social-justice/helping-people-get-online>

8. Under the current system, it is relatively rare for a private tenant to be evicted on conduct grounds. In the 2024 English Private Landlord Survey, 70% of landlords who had evicted a tenant said they had done so using a section 21 notice, compared to only 26% who had relied on a section 8 notice.<sup>4</sup> This is because landlords tend to rely on the simpler section 21 process even in the case of a conduct-related eviction. Polling by the NRLA suggested that over 70% of landlords who issued a section 21 notice said they had done so because the tenant had rent arrears, with anti-social behaviour and illegal activity being cited as other reasons.<sup>5</sup>
9. Where a renter approaches their local authority for homelessness assistance after having been evicted on a conduct ground, Z2K advisers find that they are much more likely to be found 'intentionally homeless', meaning that the council no longer has to house them and they face losing temporary accommodation quickly. By contrast, where a renter has been served with a section 21 notice – even if the underlying reason for this notice being served was a tenant conduct issue – then an 'intentionally homeless' outcome is much less likely.
10. Under the reformed system, if a landlord wishes to evict a renter over conduct issues then they will need to seek possession on that basis. It is therefore likely that the Renters Rights Act will lead to higher rates of conduct-ground evictions from the PRS, which we are seriously concerned will lead to higher numbers of households being found to be 'intentionally homeless'.
11. Being found 'intentionally homeless' has a very serious long-term impact on a homeless person. These decisions increase the chances of homeless people having to resort to sleeping rough, often for prolonged periods, on the basis that they are ineligible to receive ongoing housing support from local

---

<sup>4</sup> Ministry of Housing, Communities & Local Government. (2024, December 5). *English Private Landlord Survey 2024: Main report*. GOV.UK. <https://www.gov.uk/government/statistics/english-private-landlord-survey-2024-main-report/english-private-landlord-survey-2024-main-report>

<sup>5</sup> Clay, N. (2019, April 8). *Section 21 & landlord experience*. National Residential Landlords Association (NRLA). <https://www.nrla.org.uk/research/deep-insight/s21-and-landlord-experience>

authorities, with significant consequences for their health and wellbeing. Homeless people who are found to be 'intentionally homeless' have already been deemed to be in 'priority need', meaning that they have dependent children, are disabled or are deemed 'vulnerable' for other reasons, which means they face particularly serious impacts from rough sleeping.

**Z2K advice services case studies** (names have been changed to protect anonymity)

**Hassan** has a heart condition and serious mental health problems including a history of self-harm. He was found intentionally homeless by his local authority and was evicted from his temporary accommodation. This led to Hassan sleeping rough for a prolonged period; he would often end up boarding night buses in order to have somewhere warm to sleep. Being street homeless caused his health to deteriorate and led to him experiencing a cardiac episode which culminated in his hospitalisation.

**Ahmed**, a survivor of modern slavery, was evicted from a specialist safehouse where he had been living. He then applied to his local council as homeless and was placed in temporary accommodation. However, the council later decided he was intentionally homeless, stating he had been evicted from the safehouse for breaching rules by hosting guests, despite Ahmed saying he had received no warnings and was unaware this was prohibited. As a result, the council evicted him, and with no alternative housing, Ahmed was forced to sleep rough for over two months.

12. Z2K advisers see examples of poor and unlawful practice from London local authorities in relation to intentional homelessness. Our advice services have dealt with cases where a homeless applicant has been denied support on the grounds that a local authority wrongly believes they are intentionally homeless, only for the authority to reverse the decision and accept their mistake following the intervention of a Z2K adviser. This has included cases where a presumed 'intentionally homeless' decision was unlawfully used as the basis to decline carrying out homelessness application investigations altogether. This poor practice has resulted in homeless people unnecessarily having to sleep rough for an ongoing period, with damaging consequences for individuals and for public services including the NHS.

**Z2K advice services case studies** (names have been changed to protect anonymity)

**Yusuf** has several complex health conditions including Crohn's disease. He had been running a business and living alone in a privately rented flat, but he struggled to pay his rent after his business started to decline, leading to his eviction. He tried to apply as homeless, but said he was told over the phone that the council 'would not help someone who had just decided not to pay rent', without any proper investigation having taken place. As a result, Yusuf ended up having to sleep on the floor of the mosque for a number of weeks.

**Emily** has serious health problems, including COPD, and relies on an oxygen tank. While she was unwell, her landlord served a section 21 notice. Before it expired Emily became seriously ill and was admitted to hospital. During her stay, her landlord unlawfully cleared her home and removed her belongings. Emily applied for homelessness assistance from hospital, but the council wrongly decided she was intentionally homeless, leaving her stuck in hospital for months. The council reversed the decision and accepted their mistake after being challenged by Z2K.

13. Without action being taken to improve poor and unlawful local authority practice in relation to this issue, we have serious concerns that this will mean more disabled homeless people wrongly having to sleep rough despite being eligible for support. It is important that local authorities take steps to address issues with practice to ensure the smooth implementation of the Renters Rights Act. (We discuss the potential role that the Mayor could play in relation to this issue in paragraphs 18-20 below).

**Recommendation: Local authorities should review practice around intentional homelessness ahead of the Act's implementation.**

**How will the Renters' Rights Act affect the Mayor's Private Rented Sector Partnership, manifesto commitments, and work to provide safe and decent homes for Londoners?**

14. The Renters' Rights Act will significantly increase renters' ability to enforce their rights across range of areas. The improved security of tenure and protection from revenge evictions will increase renters' ability and willingness to make use of existing forms of redress, and the Act will also

make specific improvements to the avenues through which tenants can enforce these rights, including reforming the processes for challenging rent increases and seeking rent repayment orders via the First-tier Tribunal, and introducing a new private rented sector ombudsman.

15. Renters will have a greater need for advice and support in order to be able to exercise these rights and make use of the Act as intended. Z2K surveyed members of its steering group of low-income renters living in the Westminster City Council area about the upcoming reforms to the tribunal process for challenging rent increases.<sup>6</sup> Respondents signalled a clear willingness to make use of these new rights, but suggested that factors such as an *'overbearing'* process, the amount of time they might need to invest, and a perception that they might not succeed could put them off engaging. When asked what might help them to engage with the process, respondents suggested that access to advice would make a significant difference:

*'Perhaps if the claims were supported by an [an advice agency] then it would remove the anxiety. For example just having an agency supporting me would make me feel that my complaints are more legitimate'* – Renter

*'Legal support and help in making my case for the tribunal [would encourage me to use it]* – Renter

16. The Mayor's manifesto included a commitment to *'back renters to defend their rights'* by funding advice services and tenants unions.<sup>7</sup> We strongly welcome the Mayor's commitment of £11 million of funding to advice

---

<sup>6</sup> A short online survey was sent to members of Z2K's private renters' steering group, which was set up as part of our *Decent Homes, Affordable Rents* project. All members of the group are low-income private renters living in the Westminster City Council area. 4 group members responded to the survey, which was active from 16<sup>th</sup> – 25<sup>th</sup> January 2025.

<sup>7</sup> Khan, S., 2024. *A Fairer, Safer, Greener London for Everyone: Manifesto 2024*. [pdf] London: Sadiq for London. Available at: <https://sadiq.london/wp-content/uploads/2024/04/A-Fairer-Safer-Greener-London-for-everyone-Manifesto-2024.pdf>

agencies for Londoners since 2022, through the Advising Londoners Partnership and its replacement fund, the Family Financial Resilience Fund.<sup>8</sup>

17. However, given this manifesto commitment and given that the latest funding round will only be accessible to renters with children, there may be grounds to consider additional advice funding specifically targeted at supporting renters to exercise the new rights granted to them under the Renters Rights Act. Z2K's advice services find that households without children often still have very significant support needs because of disability, poor health and a range of other circumstances, and require advice and representation in order to be able to exercise their rights effectively. As was highlighted in a recent Mayor's Question Time Session, it is also not clear whether the specific manifesto commitment to fund tenants unions has been fulfilled.<sup>9</sup>

**Recommendation: The Mayor should consider awarding additional funding for advice services and tenants unions to ensure all renters can exercise their new rights.**

### **How can the Mayor support local authorities in London to implement and enforce the measures introduced by the Renters' Rights Act, and monitor the impact on Londoners?**

18. The Mayor plays a key role in convening London local authorities around issues related to the private rented sector. This includes running the Private Rented Sector Partnership, a forum for London local authorities to share information and best practice in relation to the PRS, and other initiatives like the Better Renting programme, which provides training and support to London local authorities in relation to PRS enforcement. The Mayor will

---

<sup>8</sup> Greater London Authority, 2026. *Mayor launches new scheme to help London families on low incomes secure up to £8 million in support that they are entitled to.* [online] London City Hall, 13 Jan. Available at: <https://www.london.gov.uk/mayor-launches-new-scheme-help-london-families-low-incomes-secure-ps8-million-support-they-are>

Z2K's advice services have received funding from both the Advice Services Partnership and the Family Financial Resilience Fund.

<sup>9</sup> London Assembly, 2025. *(Public Pack) Minutes – Transcript of Questions to the Mayor, 18 December 2025*, pp.18–19. [pdf] London: Greater London Authority. Available at:

<https://www.london.gov.uk/about-us/londonassembly/meetings/documents/b31078/Minutes%20-%20Appendix%202%20-%20Transcript%20of%20Questions%20to%20the%20Mayor%20Thursday%2018-Dec-2025%2010.00%20London%20Asse.pdf?T=9>, pp. 18-19

therefore be well-placed to convene and support local authorities in relation to their significant role in the enforcement and monitoring of the Renters Rights Act.

19. It is important that these mechanisms are developed and expanded as the Act comes into force. Research has shown that under the existing PRS enforcement framework, London local authority enforcement activity and practice varies significantly across boroughs.<sup>10</sup> Our *Decent Homes, Affordable Rents* project found evidence of a pronounced local decline in the number of residents contacting Westminster City Council's enforcement services.<sup>11</sup> We would welcome the opportunity to discuss how lessons from this project could inform the approach the Mayor and other local authorities to PRS enforcement.

**Recommendation: The Mayor should develop and expand the Private Rented Sector Partnership to support information-sharing about enforcement of the Act across different local authorities.**

20. The Mayor has made a welcome commitment to end rough sleeping in London by 2030.<sup>12</sup> While the Act should help to support this by reducing the overall rate of evictions from the PRS, the risk of an increase in intentionally homeless decisions – discussed in the section above – could lead to more vulnerable people being put at risk of rough sleeping. The Mayor is well-placed to use his existing role in convening and supporting local authorities to improve their practice and decision-making in this area.

**Recommendation: The Mayor should offer training and support to local authorities to improve practice around intentional homelessness.**

---

<sup>10</sup> Spencer, R. and Rugg, J. (2024) *Licensing Private Rented Homes: Insights and Experiences from Five London Boroughs*. Safer Renting (Cambridge House). Available at: <https://ch1889.org/wp-content/uploads/2024/03/Licensing-Private-Rented-Homes-Insights-and-Experiences-from-5-London-Boroughs-Safer-Renting-March-2024.pdf>

<sup>11</sup> Z2K, 2025. *Decent Homes, Affordable Rents: A Private Renters' Manifesto for the City of Westminster*. [online] Z2K. Available at: <https://z2k.org/decent-homes-affordable-rents/>

<sup>12</sup> Greater London Authority, 2025. *Mayor's Rough Sleeping Plan of Action 2025*. [online] London City Hall. Available at: <https://www.london.gov.uk/programmes-strategies/housing-and-land/housing-and-land-publications/mayors-rough-sleeping-plan-action-2025>

## **How can the Mayor help renters and landlords understand their new rights and responsibilities under the Act?**

21. The Act will not achieve its aim of rebalancing the relationship between landlords and tenants if the affected parties do not have a good understanding of their new rights and responsibilities. There is evidence that some unscrupulous landlords may already be seeking to take advantage of renters' lack of awareness of the Act. The Times reported that prospective tenants were being asked by letting agents to sign a 'statement of intent' that they planned to stay in the property for at least six months, in an apparent bid to subvert the increased tenant flexibility being introduced by the Act.<sup>13</sup>
  
22. While the government is undertaking its own programme of awareness-raising around the Renters Rights Act, there is a case for the Mayor to disseminate bespoke further rights awareness materials given the uniquely large and high-risk private rented sector in London. Members of Z2K's steering group of low-income renters living in the Westminster City Council area suggested that there would be value in a range of rights awareness materials, including physical content like billboards and leaflets, as well as digital content like social media posts and newsletters.

**Recommendation: The Mayor should undertake rights awareness activity around the Renters Rights Act.**

## **What impact will the Renters' Rights Act have on the supply of rented properties, and how can this be monitored?**

23. The precise effect that the Act will have on the supply of rented properties in London is unclear. Existing evidence suggests that there has already been a reduction in the size of the PRS in London, with concerning indications that the drop in supply has been particularly concentrated at the most

---

<sup>13</sup> The Times, 2025. 'Should I sign a statement of intent to secure a rental property?', *The Times*, 2 Dec. [online] Available at: <https://www.thetimes.com/life-style/property-home/article/should-i-sign-a-statement-of-intent-to-secure-a-rental-property-d5xpxhwvb>

affordable end of the market.<sup>14</sup> It will be important to monitor any potential further impact that the Act has on supply carefully, including through the rate of presentations to local authority homelessness services and the rate and duration of temporary accommodation placements.

24. Initiatives that support councils to purchase privately owned homes for use as social housing, like the Mayor's Council Homes Acquisition Programme (CHAP), are a key way to mitigate the risks posed by a further reduction in supply at the affordable end of the PRS. Other local initiatives to increase the supply of social housing, such as Enfield Council's acquisition of 219 new social homes (partly funded through GLA affordable housing grant funding), will also be vital to minimise any potential negative impact the Act has on the supply of affordable PRS accommodation.<sup>15</sup>

**Recommendation: The Mayor should continue supporting local authorities to acquire new social homes.**

25. Monitoring rent levels will also help to indicate whether the Act is leading to a reduction in the supply of rented housing. Using the new PRS database being introduced under the Act as an opportunity to collect data on actual rents, as the Mayor has called for, would enable more accurate monitoring of the potential impact of the Act on rent levels and supply, with advertised rents not providing the full picture.

26. Should such pressures on rents emerge, it will be particularly important for action to be taken to protect vulnerable renters from affordability shocks. Across London, the average one-bed private rented flat costs 52% of median pre-tax pay, meaning that private renters in London are particularly exposed to insecurity as a result of rent increases, which will still be permissible within

---

<sup>14</sup> London Councils (2024) *Private rented housing supply in London*. London Councils. Available at: <https://www.londoncouncils.gov.uk/news-and-press-releases/2024/private-rented-housing-supply-london>

<sup>15</sup> London Borough of Enfield (2025) *KD5922 – Acquisition of Affordable Homes at New Avenue Phase 3: Part 1*. Available at: <https://enfield.moderngov.co.uk/documents/s111242/KD5922%20-%20Acquisition%20of%20Affordable%20Homes%20at%20New%20Avenue%20Phase%203%20-%20Part%201.pdf>

market levels under the Act.<sup>16</sup> Renters on benefits are at even greater risk from rent increases, given that local housing allowance is currently frozen at 2023 rates. This means that it will be very important that there is flexibility to introduce further measures to stabilise the market, including the power to introduce rent controls as the Mayor has called for previously.

**Recommendation: The Mayor should continue to call for powers to introduce rent controls and for the government to collect actual rent data via the PRS database.**

*We would welcome the opportunity to discuss any aspect of this submission. Please reach out to Samuel Thomas, Senior Policy Advisor, at [REDACTED] if you would like to set up a meeting.*

---

<sup>16</sup> Trust for London, 2026. *Rent affordability by London borough*. [online] Trust for London. Available at: <https://trustforlondon.org.uk/data/rent-affordability-borough/>