

Royal Borough of Greenwich Selective Licensing consultation and evidence report 2026

Executive summary

The Royal Borough of Greenwich, like many London boroughs, is facing ongoing pressure to meet demand for affordable, safe, and good quality housing.

A significant and growing share of homes in Royal Greenwich are in the private rented sector (PRS). To understand the scale and nature of issues within the PRS, the council commissioned an independent specialist review in November 2025. The review combined council data with external datasets and statistical modelling and was validated against local inspection data. It found that poor housing conditions in the PRS are widespread and that serious housing hazards are above the national benchmark.

Since October 2022, the council has operated selective licensing in parts of six wards (based on pre-2023 boundaries), alongside mandatory and additional HMO licensing. The council's evidence indicates that licensing supports more systematic identification of hazards and improvements in management standards. However, the latest review shows that poor conditions extend beyond the current licensing area. Without licensing, the council is more reliant on tenant complaints and reactive enforcement, which can delay intervention.

The council is therefore consulting on proposals to introduce a new Selective Licensing Scheme across 18 wards (17 full wards and part of Woolwich Arsenal). The proposal would revoke the current designation and redesignate the existing area within a new scheme, alongside additional wards where evidence shows a combination of high PRS presence, poor housing conditions, and, in some areas, high deprivation.

If approved, the proposed scheme would run for five years and would require privately rented homes (not already covered by mandatory or additional HMO licensing) within the designated areas to be licensed. The scheme is intended to improve housing conditions, strengthen landlord accountability, support responsible landlords, and protect tenants.

This consultation invites views from tenants, landlords, agents, residents, businesses, and community organisations. Feedback will inform the council's final decision.

I. Introduction

This report sets out the council's proposals for a new selective licensing scheme for privately rented homes and explains the evidence supporting those proposals. It is intended for residents, tenants, landlords, and other stakeholders.

Selective licensing is one of the key tools available to the council under Part 3 of the Housing Act 2004. In a designated area, landlords of privately rented properties must apply for a licence and comply with licence conditions. Licensing helps councils ensure that properties meet legal standards and are managed properly.

This document explains:

- the condition of the private rented sector in Royal Greenwich
- evidence of poor housing conditions and wider impacts
- the proposed designation area
- the proposed scheme objectives, licence conditions, and fees
- how you can share your views.

I.1. Who we want to hear from

The council welcomes views from:

- tenants
- landlords
- managing agents
- residents
- businesses
- community organisations
- public services
- voluntary sector organisations
- any person likely to be affected by the proposals

Your views and experiences will help ensure responsible landlords are supported, every renter can feel proud of their home, and rogue or criminal landlords and agents are identified and removed from the sector.

I.2. Consultation period

The consultation will run for a minimum period of 12 weeks.

- Start Date: Tuesday 21 July 2026
- Closing Date: Monday 12 October 2026

I.3. How to respond

You can take part in the consultation in the following ways:

- Complete the online survey
- Attend a consultation event (online or in person)
- To request a paper copy of the consultation or have any questions please contact us:

Email: PRPL2@royalgreenwich.gov.uk

Call: 020 8921 8152

In writing: Private Housing & Environmental Health Standards,
Royal Borough of Greenwich
The Woolwich Centre,
35 Wellington Street,
London,
SE18 6HQ

If you need support, please contact the community engagement team
<https://communityconversations.royalgreenwich.gov.uk/help-and-support>

I.4. Where the proposals would apply

The proposals set out in this report apply to privately rented homes in the wards listed below and shown on the designation maps:

- Abbey Wood
- Blackheath Westcombe
- Charlton Hornfair
- Charlton Village & Riverside
- East Greenwich
- Eltham Page
- Eltham Town & Avery Hill
- Greenwich Park
- Kidbrooke Park
- Middle Park & Horn Park
- Plumstead & Glyndon*
- Plumstead Common*
- Shooters Hill*
- Thamesmead Moorings
- West Thamesmead
- Woolwich Arsenal*
- Woolwich Common*
- Woolwich Dockyard*

Wards marked with an asterisk (*) are entirely or partially within the current Selective Licensing Scheme.

2. Background

The Royal Borough of Greenwich is consulting on proposals to implement a new Selective Licensing Scheme to 18 wards under Part 3 of the Housing Act 2004 (total designation of 17 full wards and 1 part ward). The proposed scheme, detailed in the designation section and supporting maps, would cover all wards except part of Woolwich Arsenal.

The Royal Borough of Greenwich intends to revoke the existing selective licensing designation to enable the proposed designations.

If approved, the new Selective Licensing Scheme would cover approximately 70% of the Private Rented Sector (PRS) within the Royal Borough of Greenwich.

The purpose of this consultation is to:

- inform stakeholders about the proposals
- seek views on potential impacts (positive and negative)
- gather feedback on how the scheme should be implemented.

2.1. Legal background

Selective licensing is a statutory tool that enables local authorities to regulate the condition and management of privately rented homes. Its purpose is to improve housing standards, protect tenants, and support well managed neighbourhoods

Under the Housing Act 2004, a designation may be introduced where an area meets specific criteria, including a high proportion of PRS homes and issues such as poor housing conditions.

Selective licensing can only be introduced where certain legal conditions are met. These are set out in the Housing Act 2004 and national guidance.

A council may introduce selective licensing where an area is experiencing one or more issues, including:

- poor housing conditions
- high levels of deprivation
- anti-social behaviour
- crime or other community challenges
- or other factors affecting housing demand or local stability.

In practice, councils must show clear evidence that these conditions exist and that licensing will help improve the situation.

2.2. Key benefits of selective licensing

Discretionary property licensing schemes such as Selective Licensing and Additional HMO Licensing are designed to deliver large-scale, strategic improvements in the private rented sector (PRS). Their core principles are set out below.

2.2.1. Driving large scale improvement across the sector

Discretionary licensing enables local authorities to raise standards and professionalise the private rented sector by:

- professionalising landlords and agents through mandatory compliance with licence conditions and higher management standards
- identifying rogue or non-compliant landlords through their refusal or failure to engage with licensing requirements
- holding landlords and managing agents accountable for the declarations they make and the standards they must meet
- empowering tenants to hold landlords to account, for example, by applying for Rent Repayment Orders for unlicensed properties or challenging unlawful eviction or possession practices.

2.2.2. Consolidating and strengthening regulatory powers

Using Part 3 of the Housing Act 2004 allows local authorities to bring together a range of regulatory responsibilities that would otherwise sit across multiple bodies, such as:

- EPC enforcement (Trading Standards)
- Gas safety (Health and Safety Executive)

Licensing also enables unannounced inspections to assess compliance with licence conditions which provides a more efficient and less bureaucratic approach than reliance on Part 1 (HHSRS), which typically requires prior notice.

2.2.3. Clear and robust enforcement framework

Licensing creates a clear, binary enforcement regime:

- a property must be licensed where required.
- failure to licence is an offence, subject to civil penalties of up to £40,000 or prosecution.
- breaches of licence conditions are also offences, enforceable through significant penalties.

This clarity reduces ambiguity and strengthens enforcement compared with more complex Part 1 processes.

2.2.4. Assessing the “fit and proper” status

Licensing provides the only formal mechanism for assessing whether a landlord or person in control is “fit and proper.” This is fundamental to:

- preventing unsuitable individuals from operating in the sector
- improving professionalism and accountability
- protecting tenants and communities from poor management practice.

2.2.5. Supporting a holistic, community focused strategy

Licensing supports coordinated action on wider issues, including:

- anti-social behaviour
- deprivation
- poor housing conditions
- social mobility barriers.

Through engagement with landlords, tenants, businesses, and community groups, licensing aims to:

- normalise licensing as a core landlord responsibility
- signal legitimately licensed properties reflect a compliant management
- promote shared responsibility, including landlord accountability for issues within their control (e.g., waste disposal, noise, tenant behaviour)
- strengthen community voice through a transparent regulatory framework.

2.3. Existing Selective Licensing Scheme

The council currently operates selective licensing in parts of six wards (based on pre 2023 ward boundaries):

- Plumstead and Glyndon
- Plumstead Common
- Shooters Hill
- Woolwich Arsenal*
- Woolwich Common
- Woolwich Dockyard*

(*previously part of the former Woolwich Riverside ward). The existing designation came into force in October 2022 and is due to run until September 2027.

Selective licensing operates alongside mandatory and additional HMO licensing. Together, these schemes support the council's work to improve standards and management in the private rented sector.

What the current scheme has achieved

Since its introduction, the current selective licensing scheme has supported a more proactive approach to improving housing conditions in the private rented sector.

Through licensing, the council has been able to carry out more targeted inspections, leading to earlier identification of hazards and improved property conditions. Enforcement action, combined with engagement and support for landlords, has helped address issues such as damp and mould, fire safety risks, and poor property management.

The scheme has also improved landlord awareness of legal responsibilities and contributed to increased accountability within the sector. Evidence from inspection activity shows that hazards are more frequently identified and addressed in areas where licensing is in place, demonstrating the value of a proactive, area-based approach.

Number of pro-active selective licensing inspections	Total Number of Hazards Identified	No. of severe hazards	No. of moderate hazards	No. of minor hazards	Properties Improved	Properties with ongoing works
699	2,643	738	1,043	862	653	46

Table 1- Outcomes achieved by the selective licensing scheme 2025/2026

Appendix 4 contains a number of case studies demonstrating how selective licensing has delivered improvements within privately rented properties.

2.4. Why a new scheme is proposed

Evidence gathered during the current designation shows that, while progress has been made, significant issues remain.

A substantial proportion of licensable properties are still not licensed (only approximately 60% are currently licensed) and further progress is required to achieve expected compliance levels (typically 85-95%). The latest PRS review also indicates that serious hazards persist within the existing selective licensing area and demonstrates the need for continued intervention.

Additionally, the stock condition survey indicates that poor housing conditions and higher concentrations of risk extend beyond the current scheme area. The introduction of a new scheme (incorporating the existing selective area) will build on existing progress and help ensure that privately rented homes are safe, well managed, and legally compliant.

Without selective licensing, the council is more reliant on complaints and reactive enforcement, which can delay identification and resolution of serious hazards.

2.5. Alignment with existing selective licensing areas

The Royal Borough of Greenwich proposes to revoke the existing Selective Licensing Scheme (now in its fourth year) and redesignate the same area within a new, expanded scheme for a further five-year period.

This approach is not simply administrative, it is a deliberate, evidence-led intervention to sustain momentum and address persistent non-compliance in the private rented sector.

As outlined above, evidence gathered throughout the current designation demonstrates that while progress has been made, underlying issues remain entrenched. A significant proportion of properties continue to exhibit poor conditions, including serious hazards. Anecdotal evidence suggests that landlord and tenant awareness of the existing scheme is poor, and only approximately 60% of licensable properties are currently licensed.

This level of compliance falls materially below the expected benchmark for an effective regulatory regime and indicates that, without continued intervention, improvements are unlikely to be sustained or expanded.

Revocation and immediate redesignation serve three critical purposes:

- maintaining regulatory pressure: Ensures that non-compliant landlords cannot benefit from regulatory gaps or lapses, and that enforcement activity continues without interruption.
- resetting and strengthening compliance expectations: Establishes a clear expectation that licensing is a continuing obligation, not a one-off requirement.
- responding proportionately to ongoing risk: Aligns the council's approach with the scale and persistence of identified hazards and management failures.

In addition, the incorporation of existing and newly proposed areas into a single, expanded scheme delivers a more coherent and effective regulatory framework. Aligning all designations to a common timeframe provides:

- clarity and certainty for landlords, tenants, and stakeholders through a single, consistent licensing cycle
- operational efficiency by enabling the council to deploy resources strategically across a unified programme
- consistency in standards and enforcement, ensuring that all areas are subject to the same expectations and regulatory approach
- prevent parts of the same wards being on different designation timescales
- reaffirms the council's commitment to the scheme.

The inclusion of the existing wards within the proposed designations ensures that the intervention remains targeted where need is greatest, while also embedding those areas

within a broader, borough-wide strategy to improve housing conditions and management standards.

Taken together, this approach represents a logical and necessary progression of the Royal Borough of Greenwich's housing enforcement strategy, moving from initial intervention to sustained, structured regulation. It ensures that progress to date is not lost, that persistent risks continue to be addressed, and that all privately rented homes within the designated areas are brought closer to the expected standard of safety, management, and legal compliance.

Ward	PRS dwellings	Properties with one or more hazards (predicted)	% properties with one or more hazards (predicted)	Properties inspected with one or more hazards	Number of properties not inspected with expected hazards
Plumstead & Glyndon	2,679	745	30.3	222	523
Plumstead Common	1,400	395	30.1	89	310
Shooters Hill	1,178	270	24.1	94	176
Woolwich Arsenal	2,944	174	6.1	70	104
Woolwich Common	1,455	364	26.9	177	187
Woolwich Dockyard	1,126	145	13.2	28	117

Table 2- Predicted hazards within existing scheme

3. The Private Rented Sector (PRS) in the Royal Borough of Greenwich

To develop a robust and detailed understanding of the PRS, the council commissioned an independent specialist to undertake a comprehensive housing stock review.

This methodology developed by Metastreet Ltd has been applied by a number of local authorities and enables a comprehensive understanding of the relationship between housing conditions and wider social, environmental, and economic stressors.

This evidence-led assessment draws on a wide range of internal and external datasets and uses property level modelling linked by Unique Property Reference Numbers (UPRN) and machine learning to analyse the Royal Borough of Greenwich's housing stock and provide detailed estimates of:

- the size and composition of the PRS, including changes in tenure over time
- the prevalence of serious housing hazards, including Category 1 and high scoring Category 2 hazards (as defined under HHSRS), representing the most significant risks to health and safety

Wider housing-related stressors linked to the PRS, including anti-social behaviour (ASB), service demand, population characteristics, and deprivation.

The full findings are set out in the Housing Stock Condition and Stressors Report (HSCR), included in Appendix I. Key findings are summarised below to support this consultation.

3.1. Methodology overview

The Housing Stock Review referred to as Tenure Intelligence (TI) uses a combination of council held and publicly available data to identify tenure and assess property level risks.

In collaboration with the Royal Borough of Greenwich, Metastreet developed a comprehensive residential property data warehouse focused on the PRS and known houses in multiple occupation (HMOs). This integrates:

- licensing and application data held by the authority
- external datasets
- predictive modelling techniques.

All data is linked to Unique Property Reference Numbers (UPRNs), enabling consistent, property level analysis across datasets.

Advanced statistical modelling and machine learning techniques have been applied to:

predict the likelihood of Category 1 and high Category 2 hazards at property level
generate HHSRS risk bandings (A–D)

identify relationships between housing conditions, tenure, and wider stressors.

Risk factors were systematically tested for predictive strength. Variables that were duplicative or statistically insignificant were excluded, ensuring that only the most robust predictors were retained within the model.

3.1.1. Model limitations and validation

As with all large-scale datasets and predictive models, a degree of uncertainty is inherent, and outputs cannot be considered 100% precise. However, the methodology has been strengthened through local validation.

The council provided five years of compliance inspection data (November 2020 to November 2025), which was used to test the model's outputs. This demonstrated a strong alignment between predicted hazard levels and observed conditions on the ground.

Given:

- the strength of the methodology
- its validation against local inspection data
- the age of Census data (now over five years old).

the council considers the PRS Stock Review (TI) to be the most accurate and up-to-date evidence base where discrepancies arise between datasets.

Further detail on the methodology is provided in Appendix I - Housing Stock Condition and Stressors Report (HSCR).

3.2. Population growth and tenure patterns

Population growth and tenure patterns provide important context. The Office for National Statistics estimated Royal Greenwich's population at 289,100 in 2021, increasing to 299,528 in 2024. Over the past decade, tenure patterns have shifted: the PRS increased from 21% in 2011 to approximately 26% in 2025 (an overall increase of 17.2%).

This equates to an average annual growth rate of approximately 1.2%, reflecting sustained demand for housing across the borough.

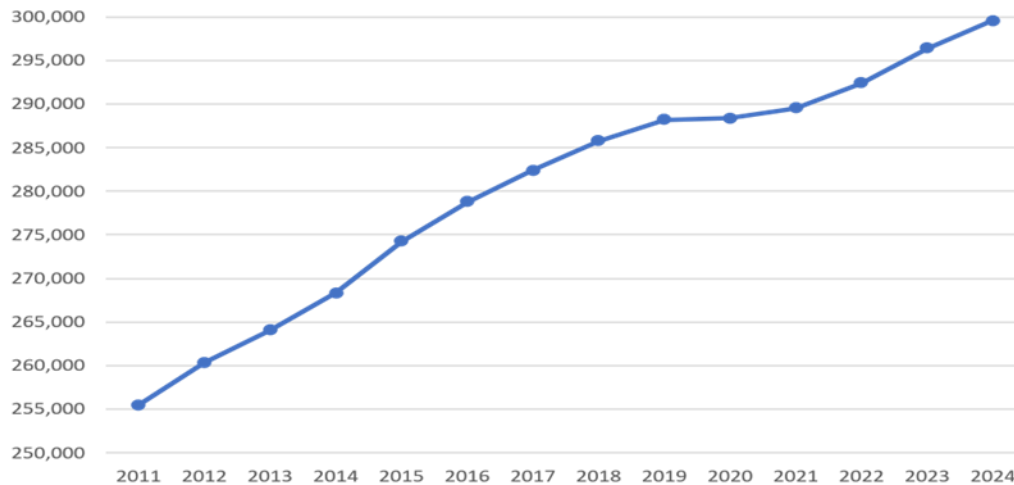


Figure 1. Midyear population estimates 2011–2024

There are 126,184 residential properties in Royal Greenwich (excluding shell properties). Approximately 32,242 properties (about 26%) are in the PRS. The PRS is present in every ward, with significant variation in concentration.

Over the past decade, tenure patterns have shifted significantly:

- The PRS has increased from 21% in 2011 to approximately 26% in 2025.
- Social housing has declined proportionally.
- Owner occupation has fluctuated but remains the largest tenure overall.

This trend demonstrates sustained growth in the PRS and increasing reliance on privately rented accommodation.

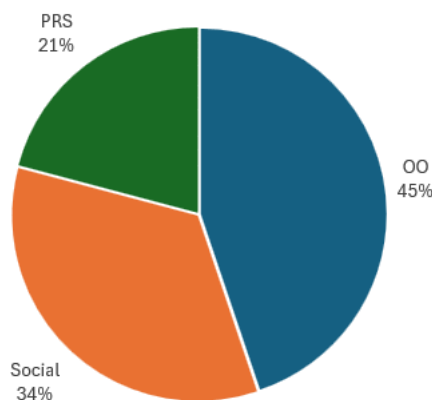


Figure 2. Tenure types 2011

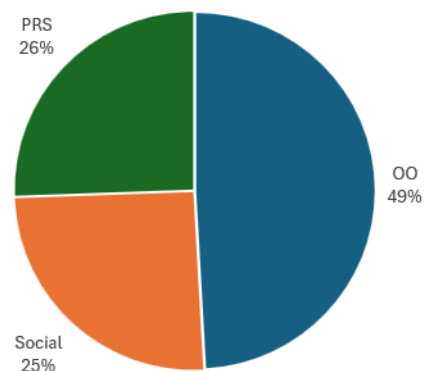


Figure 3. Tenure types 2025

Table 1 shows the number of households/dwellings by tenure. Table 2 shows the same trends as percentages.

Tenure	2011 (households)	2021 (households)	2025 (dwellings)
Owner Occupied	45,299	49,398	61,971

Social Housing	34,662	35,327	31,971
PRS	21,084	29,326	32,242
Total	101,045	114,051	126,184

Table 1. Numbers of households and dwellings by tenure type in Royal Greenwich 2011–2025 (Source: ONS & Ti 2025).

Tenure	2011 (households) %	2021 (households) %	2025 (dwellings) %
Owner Occupied	44.8	43.3	49.1
Social Housing	34.3	31.0	25.3
PRS	20.9	25.7	25.6
Total	100%	100%	100%

Table 2. Percentage of households and dwellings by tenure type in Royal Greenwich 2011–2025 (Source: ONS & Ti 2025).

3.2.1. Data interpretation (census and model differences)

It's normal for the 2021 census figures and the council's Tenure Intelligence (TI) estimates to look slightly different and can be explained by:

- the impact of COVID-19 restrictions on census response rates, particularly within the PRS¹²
- census data is self-reported whilst TI data is based on known dwellings
- the distinction between households (census) and dwellings (TI data), where a single dwelling may contain multiple households.

For this evidence base, the council is using the TI dataset because it is designed to give the most up to date picture of current housing in Royal Greenwich

3.3. Spatial distribution of the PRS

Private rented homes are found in every ward in Royal Greenwich, but the numbers vary a lot from place to place from 369 properties in some wards to 2,944 in others. This distribution highlights both borough-wide prevalence and localised concentrations of PRS housing.

As private renting is both widespread and growing, and evidence shows serious hazards in the sector and associated stressors (such as high level of deprivation), the council believes a more proactive, targeted and sustained regulatory approach is needed to help identify problems earlier and improve standards.

¹ Timeline of UK government coronavirus lockdowns and restrictions, <https://www.instituteforgovernment.org.uk/data-visualisation/timeline-coronavirus-lockdowns>

² On Article (July 2022) <https://www.on.co.uk/-councils-briefing-warns-that-census-may-have-significantly-undercounted-capitals-population/>

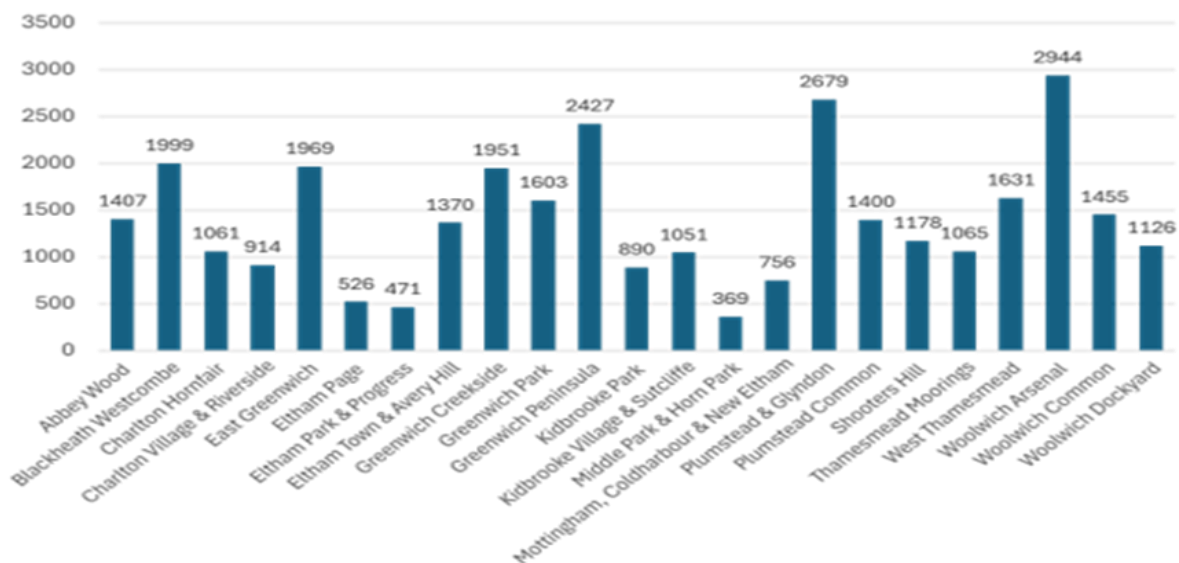


Figure 4- Number of PRS (including known HMO) by ward³

3.4. Evidence of poor housing conditions

The council's housing stock review shows that serious health and safety risks are found in many privately rented homes across Royal Greenwich. These risks are measured using the Housing Health and Safety Rating System (HHSRS). Under this system:

- **Category 1 hazards (Rated A-C)** are the most serious and can pose an immediate danger to people living in the property.
- **High Category 2 hazards (Rated D-E)** are less severe than Category 1 but can still create significant risks and harm.

The review estimates that 5,360 privately rented properties (excluding known HMOs) contain at least one serious hazard. This is around 17.5% of the private rented sector. Across the wards proposed for licensing, the estimated level of serious hazards ranges from 13% to 23%, which is well above the national benchmark of 9%⁴-10%⁵ (for Category 1 hazards only).

3.4.1. Validation of model using inspection data

While predictive modelling forms an important component of the evidence base, it is not relied upon in isolation. The council recognises the importance of grounding decisions in observed data and therefore places significant weight on inspection outcomes, complaint data, and enforcement activity.

³ Taken from Figure 13 of the Ti 2026 Evidence Report

⁴ [English Housing Survey 2022 to 2023: housing quality and condition](#)

⁵ [BRE response to the HCLG Committee call for evidence on housing conditions in England-15 August 2025](#)

The predictive model enhances this evidence by enabling borough-wide analysis that would not be achievable through inspections alone, given resource constraints. This combined approach ensures that the evidence base is both comprehensive and robust, balancing empirical observation with advanced analytical techniques.

The model has been subject to local validation using two years of compliance and inspection data. Between 1 November 2020 and 1 November 2025, the council carried out 4,130 inspections of privately rented homes (excluding known HMOs) and identified 4,762 hazards. Of these, 1,226 hazards (26%) were classed as severe (equivalent to rating A-E). The inspections also found that 27% of properties (1,103 inspections) contained more than one hazard, showing that issues are often multiple and ongoing rather than isolated.

This data demonstrates a strong alignment between predicted hazard likelihood and observed conditions, reinforcing the robustness and reliability of the methodology used for the modelling.

Inspection patterns further show that significantly higher levels of activity, and correspondingly higher levels of identified hazards, occur within areas currently subject to selective licensing. This is consistent with the Housing Stock Review, which identifies these wards as having higher concentrations of poorer-quality PRS accommodation.

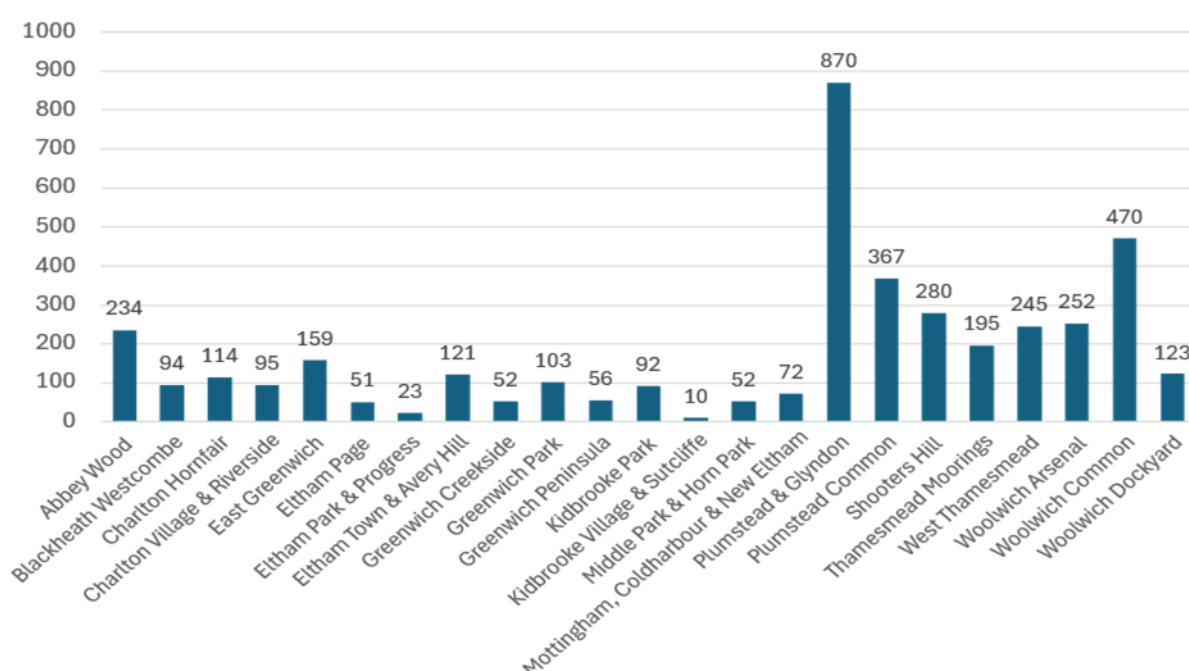


Figure 5- Property inspections across Royal Greenwich⁶

The evidence also highlights the wider impact of poor housing conditions on residents and neighbourhoods. While anti-social behaviour is no longer a primary basis for the proposed

⁶ Taken from figure 22 of the Ti2026 Evidence Report

designations, poorly managed privately rented properties can contribute to wider community issues where problems are not identified and addressed at an early stage. This reinforces the need for a proactive approach to regulation and oversight.

3.4.2. Nature and distribution of hazards identified at inspection

A total of 4,762 hazards were identified during inspections (Figure 6), with a strong correlation between inspection volume and hazard detection (Spearman Rank correlation 0.96, $p < 0.001$). This indicates that areas of higher enforcement activity are also areas of higher risk.

The greatest concentration of hazards identified through inspection was in Plumstead and Glyndon (1,217 hazards), with similar patterns observed for severe hazards (Figure 7).

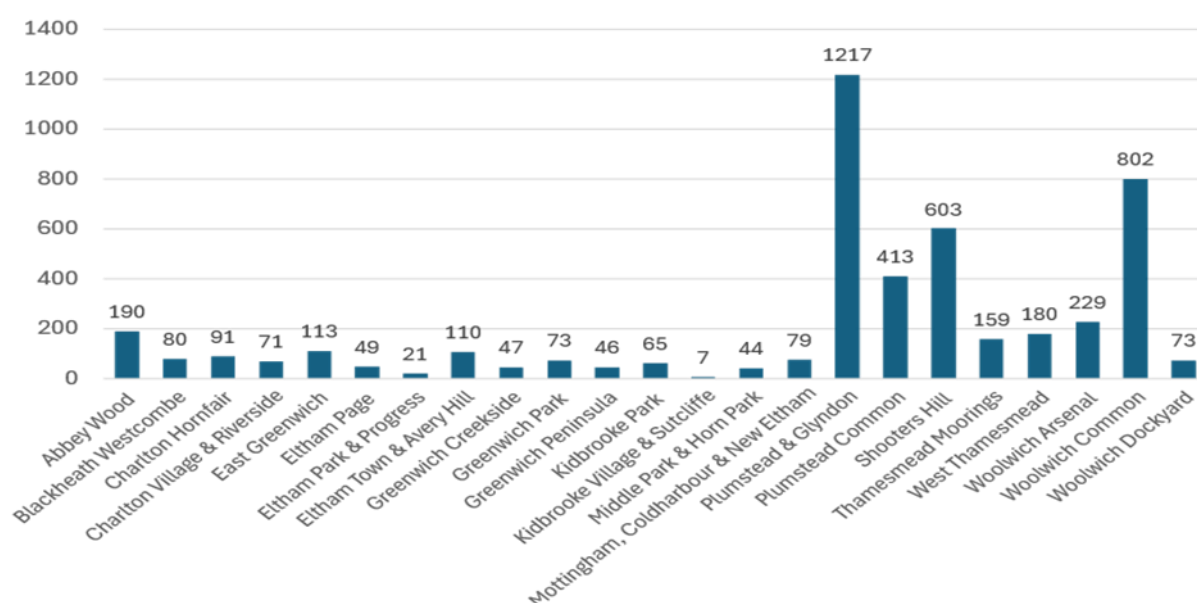


Figure 6- Hazards identified during inspections⁷ (Source: Ti 2026)

⁷ Taken from figure 23 of the Ti 2026 Evidence Report

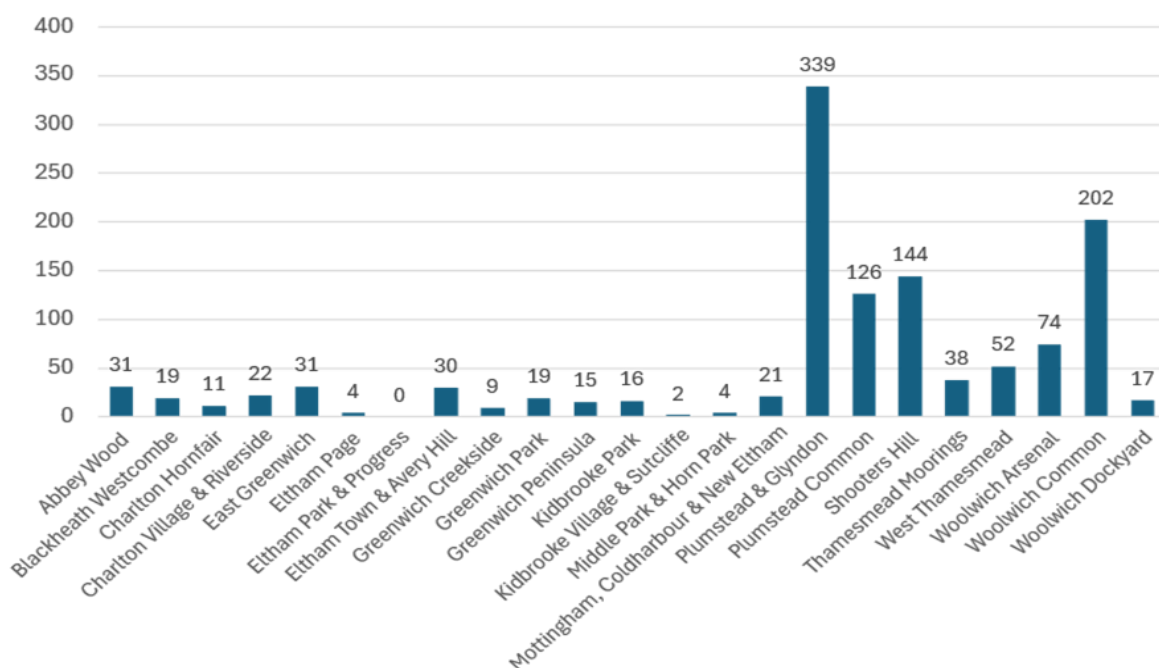


Figure 7 Severe hazards identified during inspections⁸

The most common hazards identified were:

Hazard type	% of Total
Damp and mould	18.36%
Fire hazards	11.61%
Domestic hygiene, pests and refuse	8.73%
Excess cold	7.54%
Personal hygiene, sanitation and drainage	7.48%
Electrical hazards	6.98%
Structural collapse and falling elements	6.69%
Falls between levels	4.68%
Falls on stairs	4.29%
Food safety	3.90%

Table 5- Hazards Identified

These top ten hazards account for over 80% of all hazards identified, highlighting recurring and systemic issues across the PRS.

3.4.3. Complaints about PRS housing conditions

Complaints from tenants and others about poor conditions and inadequate management provide additional evidence of low quality PRS homes. Between 1 November 2020 and 1 November 2025, there were 6,104 complaints relating to PRS dwellings across Royal Greenwich.

⁸ Taken from figure 24 of the Ti 2026 Evidence Report

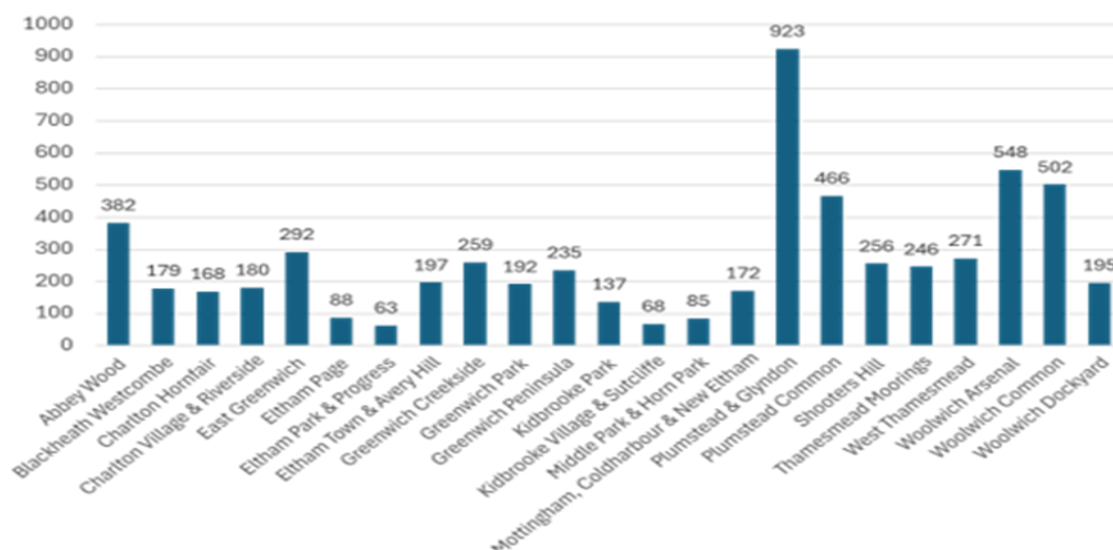


Figure 8- Private Housing complaints at PRS dwellings 2020–2025⁹

3.4.4. Modelled distribution of hazards

Modelled outputs indicate that serious hazards are present across all parts of Royal Greenwich and are not limited to one neighbourhood. While some wards have higher levels than others, privately rented homes with serious hazards are present across the borough. This supports the case for a response that is borough wide, while still focusing effort where risks are highest.

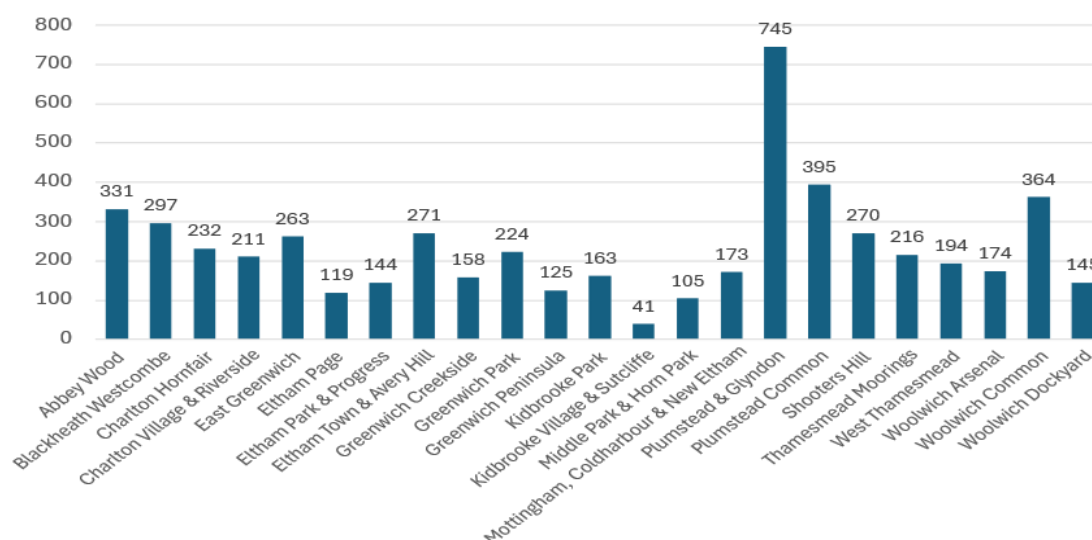


Figure 9- PRS (excl. known HMO) properties with serious hazards (HHSRS A – D) across Greenwich¹⁰

⁹ Taken from Figure 32 of the Ti 2026 Evidence Report

¹⁰ Taken from Figure 20 of the Ti 2026 Evidence Report

3.4.5. Summary of hazard justification

Taken together, the evidence demonstrates that:

- poor housing conditions within the PRS are significant, widespread, and persistent
- serious hazards are concentrated within the proposed licensing areas, but are present across the borough
- multiple hazards within single properties are commonly identified, indicating underlying and recurring management issues
- areas within Designation 3 experience compounded impacts due to elevated levels of deprivation
- without targeted intervention, these conditions are likely to persist or worsen over time.

The council's inspection and enforcement data indicates a strong association between poor housing conditions and the management of privately rented properties. Analysis of identified hazards shows that a substantial proportion arise from ongoing failures in property maintenance and management, including unresolved damp and mould, inadequate fire safety provision, and poor sanitation and hygiene conditions. These matters fall within the legal responsibilities of landlords and are directly influenced by the effectiveness of property management arrangements.

While poor housing conditions are not exclusive to the PRS, the evidence indicates that risks within this sector are more likely to remain unidentified or unaddressed in the absence of proactive regulatory oversight. This reflects the fragmented nature of the sector, variation in landlord engagement and compliance, and the reliance on tenant reporting to trigger enforcement action. As demonstrated by complaint and inspection patterns, this reactive system results in delayed intervention and allows hazardous conditions to persist.

Selective licensing addresses these underlying factors by introducing a consistent, enforceable framework for property management across the sector. By requiring landlords to proactively demonstrate compliance and enabling systematic inspection and intervention, the scheme targets the root causes of poor housing conditions. The council therefore considers that selective licensing represents a necessary and proportionate response to the scale and nature of the issues identified.

3.5. Evidence of deprivation

The Indices of Multiple Deprivation 2025 (IMD 2025) is a national measure that helps show where communities face the greatest challenges. It brings together information about things like income, employment, health, education, crime and the local environment to give an overall picture of deprivation across England.

To understand what this means at ward level in Royal Greenwich, the IMD results for smaller neighbourhoods have been combined using the government’s approach, so we can compare wards in a consistent way. Using this method, the average IMD “decile” (ranking) for Royal Borough of Greenwich wards ranges from 3 to 7. A lower number means higher deprivation; a higher number means lower deprivation.

In Royal Greenwich, 13 of the 23 wards are below the national average (which is decile 5). The least deprived ward is Eltham Park and Progress (decile 7). Eight wards fall within the most deprived 30% of areas nationally (deciles 1 to 3). Overall, deprivation tends to be higher in the north and east of the borough, although Eltham Page and Middle Park and Horn Park are notable exceptions.

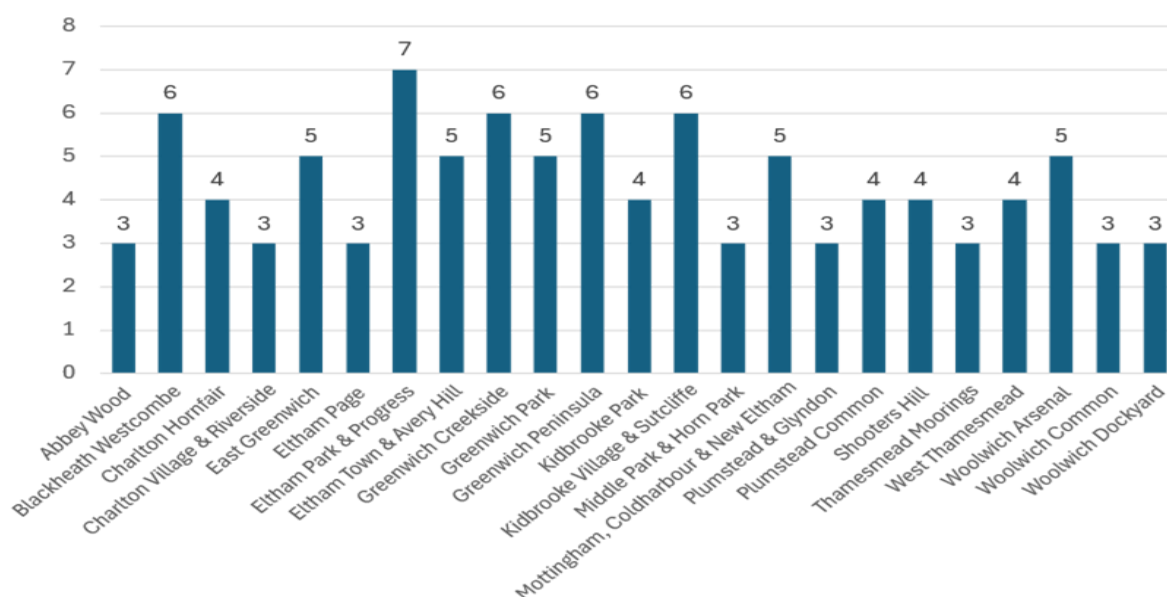


Figure 10 Average IMD (2025) decile by ward (Source: IMD 2025)

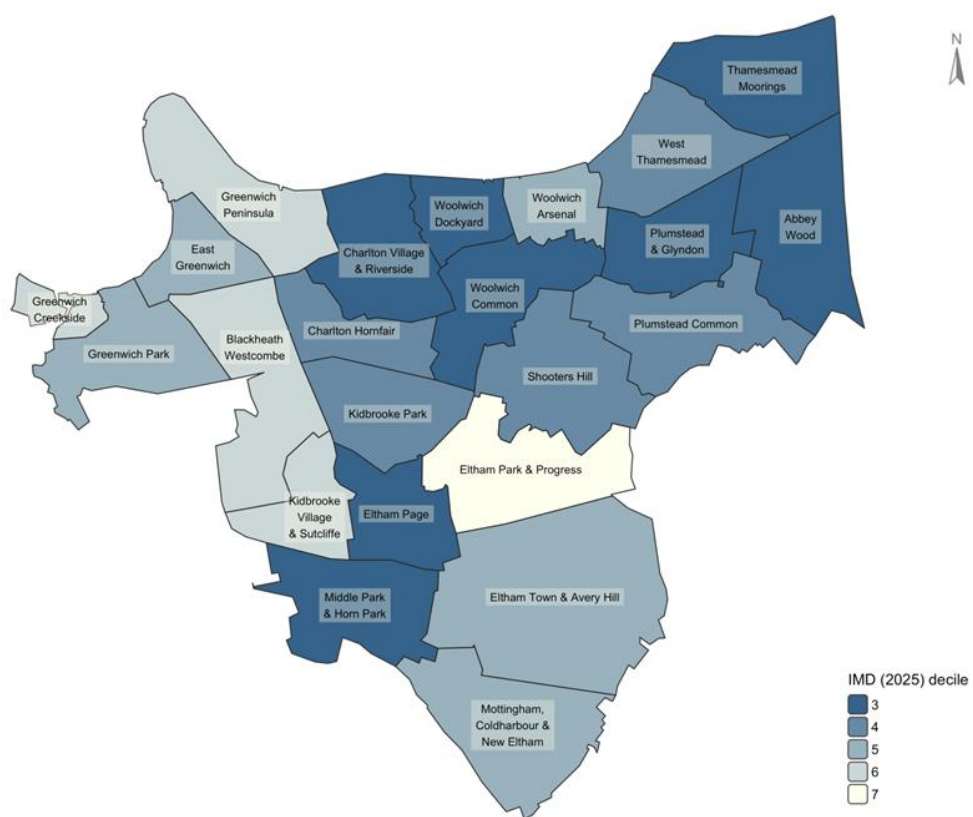


Figure 11: Map of IMD decile distribution by ward (Source: ONS 2025, Map by Metastreet)

4. Legal basis for selective licensing

Selective licensing is a statutory tool available to local housing authorities under Part 3 of the Housing Act 2004. It enables councils to designate areas where all privately rented properties (unless exempt) must be licensed, where this is necessary to address specific and evidenced housing and community issues.

Guidance confirms that selective licensing is intended to support a well-managed, safe, and sustainable private rented sector, and should be used as part of a broader strategic approach to housing and neighbourhood management rather than as a standalone intervention.

Under the Act and supporting guidance, a designation can only be made where the authority is satisfied that one or more statutory conditions apply, and that licensing will contribute to the improvement of social or economic conditions in the area.

4.1. List of statutory conditions for introducing selective licensing

A local authority may introduce a selective licensing designation where the area is experiencing one or more of the following:

1. Poor housing conditions (Section 80(3)(a))

A designation may be made where the area contains a significant proportion of properties in poor condition, and where selective licensing will contribute to improving housing standards. This includes issues identified through inspections, enforcement history, hazard assessments, and condition data.

2. Deprivation (Section 80(3)(b))

Where the area suffers from high levels of deprivation, measured using recognised indicators such as the Indices of Multiple Deprivation (IMD), including income, employment, health, education, crime, and living environment.

3. Anti-social behaviour (Section 80(3)(c))

Where there is a significant and persistent problem with anti-social behaviour, and where some private landlords have failed to take reasonable steps to address it.

4. High levels of migration (Section 80(3)(d))

Where high population turnover is impacting housing management, service delivery, or community cohesion.

5. High levels of crime (Section 80(3)(e))

Where crime is prevalent and linked to poor housing management or conditions.

6. Low housing demand (Section 80(3)(f))

Although less common in London, where an area is experiencing (or likely to experience) low housing demand, and licensing will contribute to economic and social improvement.

4.2. Statutory requirements for making a designation

In accordance with DLUHC guidance (updated December 2024), local authorities must satisfy the following requirements before making a designation:

- Robust Evidence Base - the authority must demonstrate, using reliable and up-to-date data, that one or more statutory conditions are met and that problems are significant and localised.¹¹
- Necessity and proportionality - the authority must show that selective licensing is a necessary and proportionate response to the issues identified, and that it will deliver measurable improvements.
- Strategic fit - licensing must be consistent with the authority's wider housing, homelessness, regeneration, and enforcement strategies, and should complement other interventions rather than duplicate them.
- Consideration of alternatives - the authority must consider whether other measures could achieve the same outcomes and explain why licensing is the most appropriate option.
- Consultation requirements - the authority must undertake a formal consultation for a minimum of ten weeks with persons likely to be affected, including residents, landlords, tenants, and businesses. The consultation must be based on a clear proposal and widely publicised.
- Transparency and evaluation - the authority must set out the intended outcomes of the scheme and monitor and review its effectiveness over its duration.

4.3. General approval 2024

Prior to December 2024, any selective licensing designation covering more than 20% of a local authority's geographical area and/or more than 20% of its privately rented sector required confirmation by the Secretary of State before it could come into force. This requirement acted as a safeguard to ensure that large schemes were proportionate and evidence based.

Following regulatory changes introduced in late 2024, this requirement has been removed. Local authorities can now introduce schemes of any size without prior approval, provided all statutory requirements and procedural safeguards are met, including consultation and evidence thresholds.

¹¹ [Selective licensing in the private rented sector: a guide for local authorities - GOV.UK](#)

4.4. Legal basis for selective licensing in Royal Greenwich

Having regard to the evidence base presented in section 3, the council considers that the designation of selective licensing within the proposed wards is justified and meets the statutory conditions for introducing selective licensing. To improve:

- poor housing conditions - as evidenced through housing stock analysis and hazard modelling, proactive and reactive inspections and enforcement activity
- deprivation - a number of wards within the borough are significantly deprived and are more likely to experience persistent housing related vulnerabilities.

Our proposed designations including relevant justification are provided in section 5.

4.5. Strategic fit

The Royal Borough of Greenwich's Housing and Homelessness Strategy 2021–2026¹² sets out a five-strand approach to tackling housing pressures, underpinned by resident focus, evidence-based decision-making, partnership working and digital transformation. Within this framework, the proposal to introduce selective licensing directly supports delivery of Strand 4 (Safe and sustainable homes for all)¹³ by strengthening the council's ability to improve housing conditions and management standards in the private rented sector.

Selective licensing aligns with Strand 4 commitments to support and enforce safety standards in privately owned and rented homes and to reduce inequality in housing quality across tenures. The Strand 4 delivery plan identifies selective licensing as a mechanism to tackle unethical landlord practices and raise living standards, alongside advice and engagement with responsible landlords and enforcement action where required. In doing so, it complements wider strategic aims to improve the quality of the private rented sector, which also contributes to homelessness prevention by helping residents sustain safer, more stable tenancies.

This approach is consistent with the council's corporate plan Our Greenwich¹⁴, which sets a clear borough-wide mission that people in Royal Greenwich have access to a safe and secure home that meets their needs.

Our Greenwich recognises that housing affordability and availability are among the most pressing challenges facing residents and identifies that the average property price is around 13 times median income, making access to stable housing particularly difficult for many households. It also highlights the scale of demand pressures, noting that while Greenwich Builds has delivered or started construction on around 730 homes and is planning to

¹² https://www.royalgreenwich.gov.uk/sites/default/files/2025-03/Summary_of_Housing_Strategy.pdf

¹³ https://www.royalgreenwich.gov.uk/sites/default/files/2025-03/Strand_4_document.pdf

¹⁴ <https://ourgreenwich.org.uk/>

deliver 1,750 homes in total, there remain around 25,000 people on the housing waiting list.

In addition, Our Greenwich acknowledges the ongoing impact of homelessness, including the use of temporary accommodation (there are over 1,600 households in temporary accommodation) alongside a continued commitment to work proactively with residents at risk of homelessness to help them secure safe and suitable accommodation.

Within this corporate context, the proposed Selective Licensing Scheme supports delivery of Our Greenwich by providing a structured mechanism to improve standards and management practices in the private rented sector, helping to ensure that privately rented homes contribute to the borough-wide ambition for safe and secure housing. This is particularly relevant given Our Greenwich's explicit commitment to "work with private landlords to ensure homes are safe and tenants are treated fairly", and its emphasis on strengthening housing stability as part of tackling wider cost-of-living pressures. In this way, selective licensing can be presented not as a standalone regulatory intervention, but as a practical corporate enabler of the council's stated outcomes improving day-to-day housing conditions, supporting residents' security and wellbeing, and reinforcing the council's overall strategic direction for housing.

4.6. Consideration of alternatives

The Royal Borough of Greenwich has implemented a range of measures to improve management standards within the Private Rented Sector (PRS). However, the available evidence indicates that these measures alone are not sufficient to address the scale and complexity of the issues identified. Selective licensing is therefore considered the most effective mechanism for delivering sustained improvements in housing conditions across the borough.

Licensing provides a proactive and comprehensive framework, enabling the council to make better use of its existing powers, systematically identify higher-risk properties, and focus resources on the most problematic parts of the PRS. Alternative options have been carefully considered; however, none offer the same level of coverage, accountability, or preventative impact.

4.6.1. Alternative measures considered

Before introducing selective licensing, the council has considered whether alternative approaches could address the issues identified within the private rented sector. This is an important requirement to ensure that licensing is necessary, proportionate, and represents the most appropriate response. This assessment considered the effectiveness, scalability, and limitations of existing powers, including Part 1 enforcement under the Housing Act 2004, civil penalties, and voluntary landlord accreditation schemes.

1. Use of Housing Act 2004 (Part 1) enforcement powers

Strengths:

- Enables investigation of housing conditions and service of statutory notices requiring remedial works.
- Provides powers to undertake works in default where landlords fail to comply.

Limitations:

- Primarily reactive, relying on complaints or intelligence rather than proactive identification of poor conditions.
- Does not impose a general obligation on landlords to demonstrate ongoing compliance or good management practices.
- Enforcement processes are subject to statutory appeal mechanisms, which can significantly delay remedial action.
- Works in default, is resource intensive and financially uncertain, limiting scalability.
- Critically, this approach depends on tenants reporting issues less empowered tenants are often unable or unwilling to do so, meaning the most serious hazards can remain unreported and unaddressed.

2. Prosecutions and Civil Penalties

Strengths:

- Provides a deterrent through financial penalties and legal action for non-compliance.
- Enables the council to respond to serious breaches of housing legislation.

Limitations:

- Does not guarantee timely improvements to property conditions, as legal processes can be lengthy.
- High appeal rates (approximately 1/3) to Civil Penalties resulting in increased litigation.
- Resource-intensive, with no certainty that full costs will be recovered.
- Limited ability to apply penalties in the absence of licensing, reducing overall impact.
- Focused on punishment after non-compliance, rather than preventing poor standards.
- Relies heavily on evidence often generated through tenant complaints, again disadvantaging vulnerable or less informed households who may not report issues.

3. Renters' Rights Act 2025

Strengths:

- introduces strengthened enforcement powers and increased penalties for non-compliance.
- seeks to improve tenant protections and redress mechanisms.
- future landlord register will increase transparency in PRS

Limitations:

- remains fundamentally complaint-led, relying on tenants raising concerns or landlords disclosing issues.
- does not establish a comprehensive, area-based mechanism for proactively identifying poor housing conditions.
- limited capacity to systematically capture intelligence on the PRS at a local level.
- as with existing powers, effectiveness may be constrained where tenants, particularly those who are vulnerable, do not engage with enforcement processes.
- registration is not equivalent to licensing and contains no proactive measures to ensure property safety.

3. Anti-social behaviour (ASB), statutory nuisance and Public Health powers

Strengths:

- enables targeted intervention to address ASB, environmental nuisance, and public health risks.
- can deliver effective resolution in specific cases.

Limitations:

- largely focused on tenant behaviour rather than landlord responsibility or property condition.
- does not impose proactive management duties on landlords to prevent ASB or maintain standards.
- reactive and incident-driven, rather than preventative.
- does not address underlying housing conditions or systemic management failings.
- dependent on complaints or reporting, which can be limited in communities where tenants feel unable to come forward.

3. Voluntary Accreditation Schemes

Strengths:

- enhances knowledge and professionalism among participating landlords.
- encourages compliance with good practice standards.

Limitations:

- entirely voluntary, with participation typically limited to already compliant landlords.
- rogue or poorly performing landlords are unlikely to engage.
- very low national uptake (around 2%), limiting borough-wide impact.
- does not provide any enforcement mechanism or means of identifying hidden non-compliance.
- offers no protection for tenants in poorly managed properties, particularly those least able to advocate for themselves.

Having considered the full range of available enforcement powers, the council recognises that these tools remain essential components of its regulatory approach and will continue to be used where appropriate. However, the evidence demonstrates that, in isolation, they are limited in their ability to secure consistent and sustained improvements across the private rented sector. Existing measures are largely reactive, resource-intensive, and frequently dependent on tenant complaints, which can result in inconsistent coverage and may fail to protect the most vulnerable residents.

While these powers enable the council to take action where issues are identified, they do not provide a comprehensive or preventative framework capable of addressing the systemic challenges within the sector. In particular, they do not allow for the routine identification of risks, nor do they establish a consistent baseline of management standards across all privately rented properties.

In light of this assessment, the council considers that a more proactive and structured approach is required. Selective licensing provides this by introducing an area-based scheme that requires landlords to meet clearly defined standards and enables ongoing monitoring of compliance. It shifts the focus from responding to poor conditions after they arise to preventing them through improved oversight and accountability.

Accordingly, selective licensing is considered to be the most effective and proportionate option to complement existing enforcement powers and to deliver meaningful, long-term improvements in housing conditions and management standards across the areas proposed.

5. Proposed designations

The council proposes revoking the current selective licensing designation and introducing a new scheme covering 18 wards (17 full wards and part of Woolwich Arsenal). The

proposed scheme consists of three designation areas. This structure is intended to ensure that intervention is targeted and proportionate to local conditions.

Overall, the designations would apply to approximately 22,500 PRS properties in Greenwich (excluding known HMOs), representing 70.2% of the borough's total PRS. The council considers this scale reflects the distribution of risk across the borough rather than a blanket approach.

5.1. Proposed Designation I

Designation I would introduce selective licensing for PRS dwellings (single household lets not already licensable as HMOs) to the following wards:

- Abbey Wood
- Charlton Village and Riverside
- Plumstead and Glyndon
- Thamesmead Moorings
- Woolwich Common
- Woolwich Dockyard
- and the southern part of Woolwich Arsenal (part-ward)

The main reason for Designation I is the presence of poor housing conditions, alongside higher levels of deprivation. The evidence shows that these areas have:

- a higher proportion of privately rented homes than the national average (19%)
- a significantly higher levels of serious hazards than the national benchmark (10%)
- higher levels of deprivation, with wards falling within the lowest IMD deciles.

Parts of the existing selective licensing area will be included within proposed Designation I including Plumstead and Glyndon, Woolwich Common and parts of Woolwich Dockyard and Woolwich Arsenal.

5.1.1. Southern area of Woolwich Arsenal

Woolwich Arsenal is a new ward that was formed in 2023 from parts of the former Woolwich Riverside (within the existing licensing scheme) and Glyndon wards. It is an area that has in parts experienced significant urban renewal and regeneration (particularly around the Royal Arsenal) but also comprises some of the most deprived areas in the borough.

Whilst the housing stock review indicates that selective licensing would not be appropriate at ward level in Woolwich Arsenal further analysis undertaken by the council has shown that this is an area of significant socioeconomic inequality between the renewed northern part of the ward (Royal Arsenal) and the areas that continue to form parts of Woolwich Town Centre.

Analysis conducted using the Metastreet methodology for the southern part of Woolwich Arsenal has shown that a high percentage of properties are likely to have more than one property hazard. This is further supported by inspections undertaken within the existing selective licensing scheme within the ward where high rates of hazards (74 severe hazards and 229 total hazards found from 252 inspections) continue to be found.

Whilst the original housing stock review indicated that Woolwich Arsenal is not a significantly deprived ward (IMD 2025 of 5) analysis of IMD at Local Super Output Area shows that there is a significant difference between the north of the ward and the south.

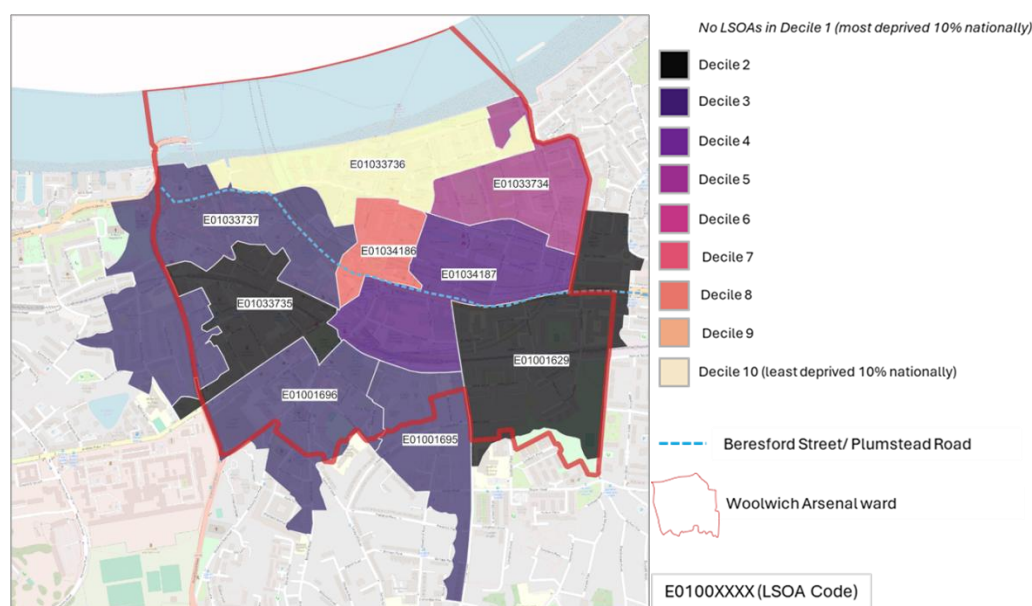


Figure 12-Index of Multiple Deprivation (IMD 2025) by Lower Layer Super Output Areas (LSOAs)

The dividing line between these areas of significant IMD variation has been identified as aligning closely with the A206 (Woolwich High Street, Beresford Street, Victory Parade, Plumstead Road) which forms a geographical demarcation between areas of renewal and older housing stock. It is therefore proposed that this road becomes the boundary line of the selective licensing area in Woolwich Arsenal.

5.1.2. Designation I data

Ward	% PRS	% properties with I+ hazards (predicted)	IMD 2025 (decile)
Abbey Wood	21.1	24.6	3
Charlton Village and Riverside	21.5	25.3	3
Plumstead and Glyndon	34.6	30.3	3
Thamesmead Moorings	23.1	20.7	3
Woolwich Common	28.0	26.9	3
Woolwich Dockyard	21.8	13.2	3

Ward	% PRS	% properties with 1+ hazards (predicted)	IMD 2025 (decile)
South area of Woolwich Arsenal	39%	12%	2-3

Table 6. Proposed Designation 1 details (Source: Ti 2026 / IMD 2025).

5.1.3. Proposed Designation 1 map

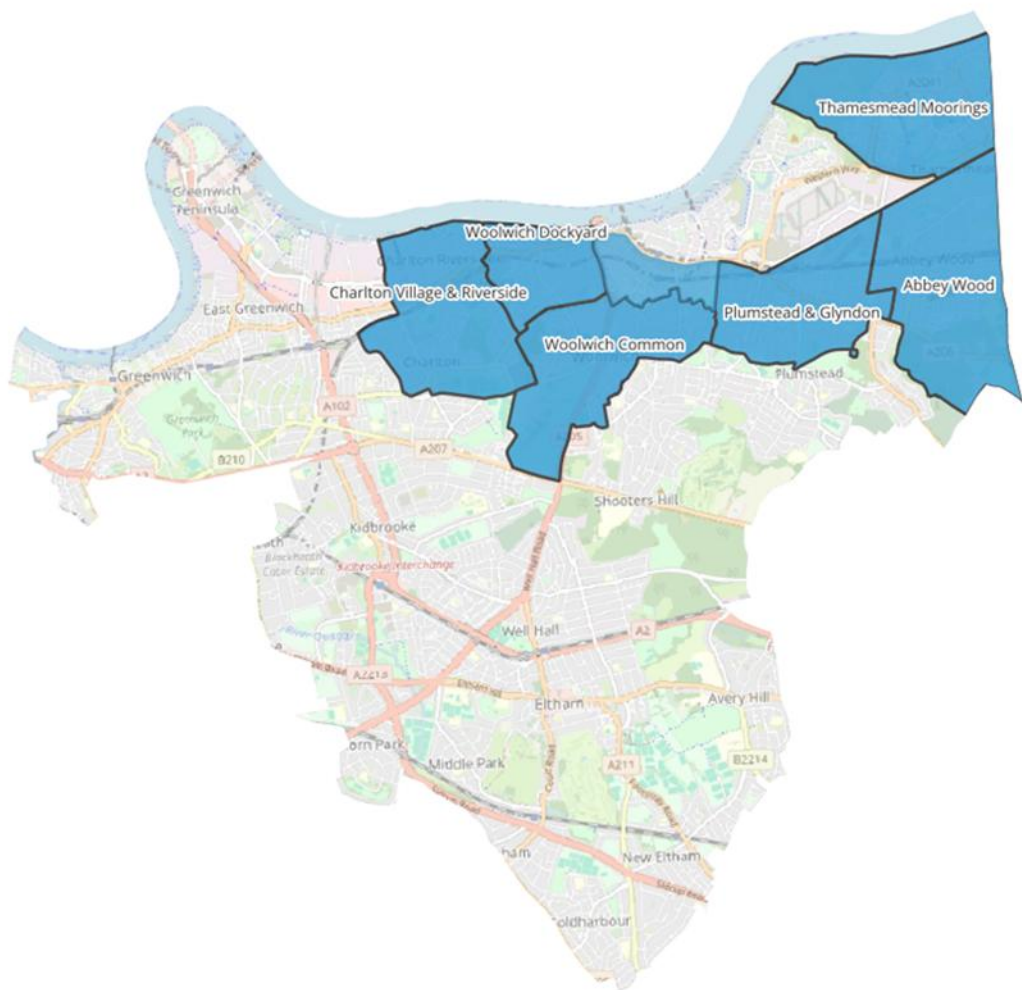


Figure 13- Map showing proposed Designation 1

5.2. Proposed Designation 2

Designation 2 would introduce selective licensing for PRS dwellings (single household lets not already licensable as HMOs) to the following nine wards:

- Blackheath Westcombe
- Charlton Hornfair
- East Greenwich
- Eltham Town and Avery Hill

- Greenwich Park
- Kidbrooke Park
- Plumstead Common
- Shooters Hill
- West Thamesmead

The main reason for Designation 2 is the evidence of poor housing conditions within the private rented sector. These areas have a higher proportion of privately rented homes than the national average (19%), together with higher levels of serious housing hazards than the national benchmark of 10% (excluding known HMOs).

Parts of the existing selective licensing area will be included within proposed designation 1 including Plumstead Common and Shooters Hill.

5.2.1. Designation 2 data

Ward	% PRS	% properties with 1+ hazards (predicted)
Blackheath Westcombe	26.9	15.1
Charlton Hornfair	22.2	22.9
East Greenwich	27.1	14.5
Eltham Town and Avery Hill	20.5	20.4
Greenwich Park	31.2	14.8
Kidbrooke Park	21.0	19.1
Plumstead Common	22.4	30.1
Shooters Hill	23.8	24.1
West Thamesmead	37.9	12.2

Table 7. Proposed Designation 2 details (Source: Ti 2026).

5.2.2. Proposed Designation 2 map



Figure 14- Map showing proposed Designation 2

5.3. Proposed Designation 3

Designation 3 would introduce selective licensing for PRS dwellings (single household lets not already licensable as HMOs) to the following two wards:

- Eltham Page
- Middle Park and Horn Park

As set out in the table below, the primary justification for selective licensing in this designation area is the high prevalence of poor housing conditions within the Private Rented Sector (PRS), evidenced by significantly elevated levels of serious housing hazards. Although the proportion of PRS stock in these wards does not exceed the national benchmark, the Royal Borough of Greenwich considers that the statutory criteria for

designation under Part 3 of the Housing Act 2004 are met on the basis of poor housing conditions and deprivation.

The designation covers two wards where a substantial proportion of privately rented properties are estimated to contain serious hazards, affecting up to one in three dwellings in the most affected ward. These rates materially exceed national benchmarks and indicate a sustained risk to tenant health and safety. Accordingly, while the PRS is smaller in scale, it contains a disproportionate concentration of substandard housing.

In particular:

- The prevalence of Category 1 and high-scoring Category 2 hazards is significantly above national norms, with estimated rates approximately two to three times the national benchmark of 10% (excluding known HMOs). This indicates comparatively poorer housing conditions and heightened risks to occupants.
- These conditions are compounded by deprivation, with both wards within IMD decile 3, indicating increased vulnerability of residents to the impacts of poor housing, including adverse health and financial outcomes.

The council has considered whether designation is appropriate given the relatively smaller PRS. In this case, the decision is based on the severity, concentration, and impact of poor conditions rather than tenure proportion alone. Evidence demonstrates that hazards are disproportionately concentrated within the PRS, creating a localised risk profile.

The council has also considered whether targeted enforcement would be sufficient. However, given the scale and concentration of hazards and the vulnerability of affected residents, a reactive approach would be unlikely to secure timely or systematic improvement. Selective licensing provides a proactive, area-based mechanism to identify and address poor conditions and management standards.

Taken together, the council is satisfied that the statutory test is met, namely that:

- the area experiences poor property conditions, characterised by a high prevalence of serious hazards within the PRS
- these conditions are associated with deprivation, exacerbating their impact and supporting the need for intervention.

Accordingly, notwithstanding the lower proportion of PRS stock, the severity, concentration, and impact of hazards within that sector, when considered alongside deprivation, provide a robust and proportionate basis for designation. The proposed scheme is a necessary and evidence-based intervention to improve housing conditions and resident outcomes.

5.3.1. Designation 3 data

Ward	% PRS	% properties with 1+ hazards (predicted)	IMD 2025 (decile)
Eltham Page	14.6	23.7	3
Middle Park and Horn Park	10.0	29.5	3

Table 8. Proposed Designation 3 details (Source: Ti 2026 / IMD 2025).

5.3.2. Proposed Designation 3 map

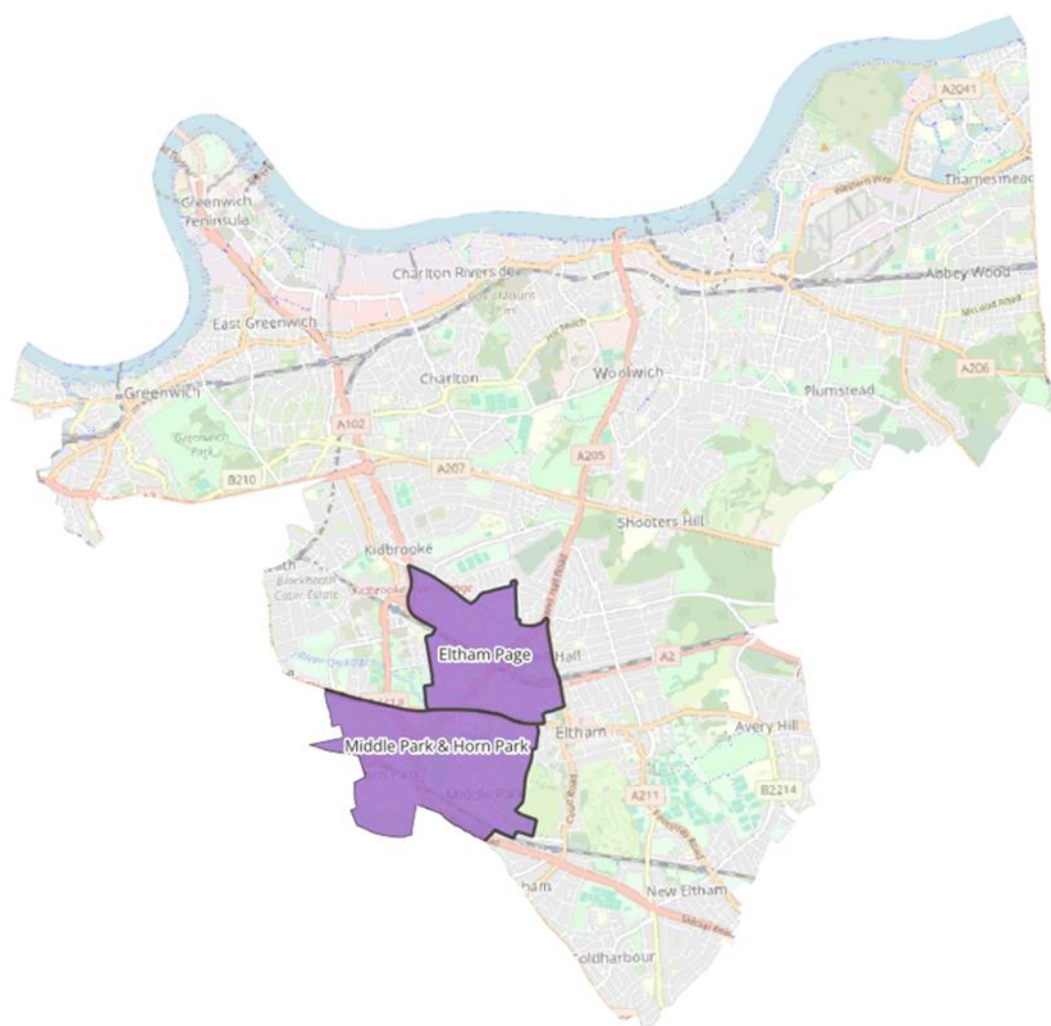


Figure 15- Map showing proposed Designation 3

5.4. Overall designations

The proposed Selective Licensing Scheme would apply to approximately 22,500 privately rented properties in Royal Greenwich (excluding known HMOs), representing around 70.2% of the borough's private rented sector.

The council has carefully considered the scale of the proposed scheme. While it covers a large proportion of privately rented homes, this reflects where the evidence shows the greatest levels of risk. Serious housing hazards are not limited to a small number of areas but are present across much of the borough, although to different degrees.

For this reason, the scheme is structured into three separate designations, allowing the level of intervention to be tailored to local conditions. Areas with the highest levels of hazards and deprivation are subject to a stronger focus, while other areas are included where evidence shows that licensing is still needed to improve standards.

The council has also considered whether a smaller or more limited scheme would be sufficient. However, the evidence shows that this would leave a significant number of hazardous properties outside the scheme and would reduce its overall effectiveness. There is also a risk that poor practice could shift into non licensed areas if coverage is too limited. For these reasons, the proposed scheme is considered both necessary and proportionate.

Subject to consultation responses and a final decision by the council, the new scheme could be introduced from spring 2027 and would run for a period of five years. It would apply to privately rented properties that are not already covered by mandatory or additional HMO licensing.

The scheme would replace the current selective licensing designation, bringing both existing and new areas into a single scheme. This will provide greater clarity for landlords and tenants and support a more coordinated approach to improving housing conditions across the borough.

A map showing the full extent of the proposed designation areas is provided below.

5.4.1. Map of total proposed Selective Licensing Scheme

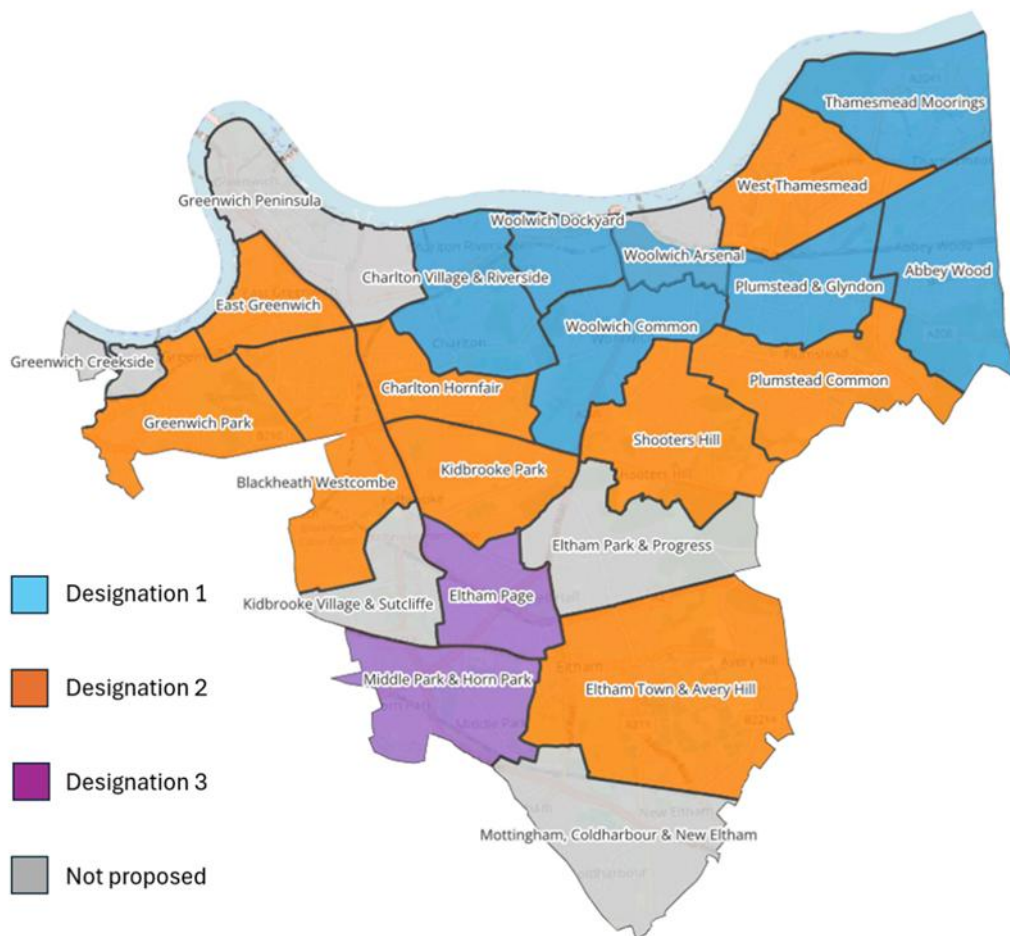


Figure 16- Map illustrating the full extent of proposed designations

5.5. Wards not proposed for selective licensing

Some wards are not included in the proposed licensing scheme because the evidence does not show that the legal criteria are met, or that introducing licensing would be a necessary and proportionate response.

In Eltham Park and Progress, and Mottingham, Coldharbour and New Eltham, the number of privately rented homes is significantly lower than the level usually used as a benchmark (around 19 to 20%). This means the private rented sector is not large enough for area-based licensing to be the most appropriate approach. Although hazard rates in these areas are high, unlike those wards proposed within Designation 3 these issues are not compounded by high levels of deprivation.

In other wards including Greenwich Creekside, Greenwich Peninsula, Kidbrooke Village and Sutcliffe, and the northern part of Woolwich Arsenal the proportion of privately rented homes is higher. However, the evidence shows that:

expected levels of serious housing hazards are at or below the national benchmark
levels of deprivation are moderate (within IMD deciles 5–6).

Taken together, this means there is not sufficient evidence to show that selective licensing is required in these areas.

5.5.1. Non-selected ward data

Ward	% PRS	% properties with 1+ hazards (predicted)	IMD 2025 (decile)
Eltham Park and Progress	11.0	31.1	7
Greenwich Creekside	34.0	8.7	6
Greenwich Peninsula	35.7	5.7	6
Kidbrooke Village and Sutcliffe	24.0	4.0	6
Mottingham, Coldharbour and New Eltham	12.7	24.0	5

Table 9. Wards not included in the proposed Selective Licensing Scheme

5.5.2. Non-selected wards map

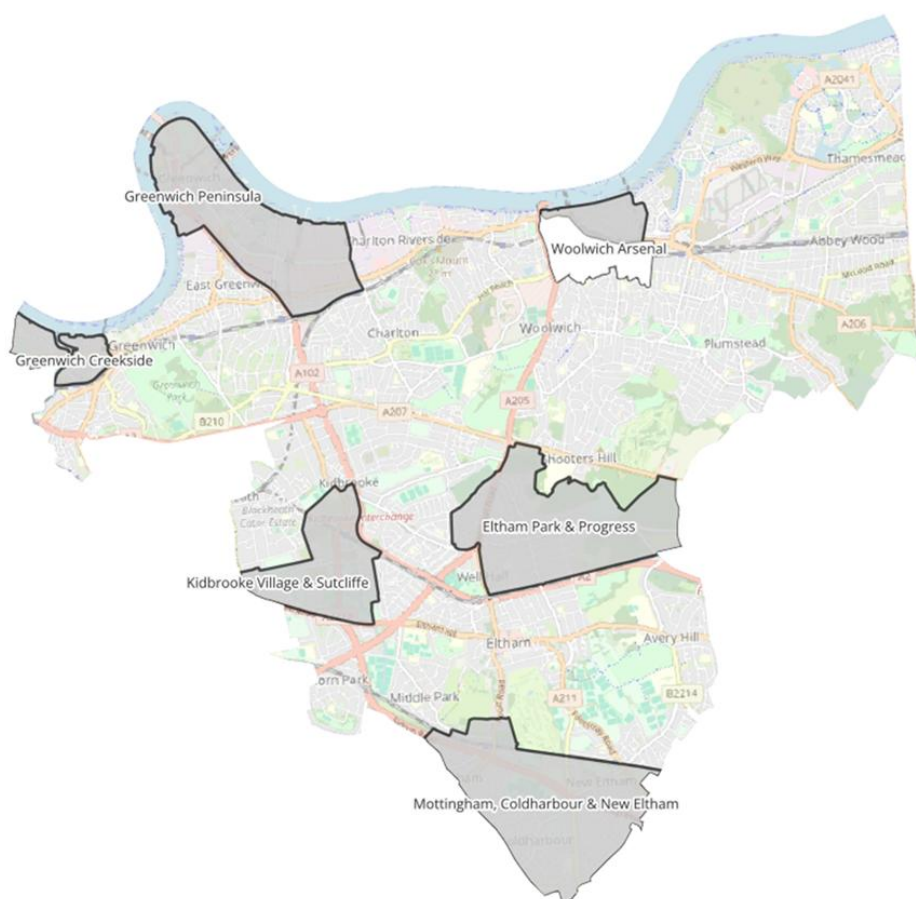


Figure 17- Map illustrating the full extent of proposed designations

6. Selective licensing exemptions

Selective licensing applies to most privately rented homes in the designated areas. However, some properties do not need a licence because they are already covered by

other licensing schemes (such as Houses in Multiple Occupation, or HMOs) or are exempt under the law.

Examples of exemptions include some properties let by public bodies (such as housing associations), holiday lets, and certain business tenancies.

Full details of all exemptions are set out in [The Selective Licensing of Houses \(Specified Exemptions\) \(England\) Order 2006](#).

7. Scheme objectives, outcomes and benefits

7.1. Scheme objectives

The proposed scheme objectives form a central part of the Royal Borough of Greenwich's wider strategy to improve the Private Rented Sector (PRS) and raise standards for private renters. The council has already implemented a range of initiatives to achieve this goal, with property licensing serving as a key component of this approach. This includes the introduction of Additional HMO Licensing to cover smaller houses in multiple occupation that fall outside the national mandatory licensing regime.

Licensing places a clear responsibility on landlords to notify the council when a property requires a licence and to ensure that it meets the required standards, with support provided by the council where appropriate. This enables the council to prioritise resources effectively by focusing on higher-risk properties and taking enforcement action against landlords who fail to licence their properties or comply with licence conditions.

7.2. Targeted interventions

The council will prioritise inspections of licensed properties using a risk-based approach informed by information provided at the application stage, ward risk profiles, previous landlord compliance, property type, energy efficiency rating and area IMD Score.

This approach enables the identification of properties most likely to fall below required standards, supports licence holders in meeting their legal duties, and facilitates targeted enforcement action, particularly where Category 1 or high Category 2 hazards are identified under the Housing Health and Safety Rating System (HHSRS).

The council will employ a team of Inspecting Officers to proactively visit and inspect privately rented properties on a no-fault basis, providing advice and guidance to landlords and tenants of identified property hazards. Where serious hazards are identified the council will utilise its enforcement powers as necessary to improve property conditions. The council will aim to inspect around 11,000 PRS properties within the five years of the scheme.

Additionally, the council will robustly pursue landlords who seek to evade property licensing and will use financial penalties to ensure that those who evade licensing do not benefit above those who seek to be compliant

7.3. Measurable aims and monitoring

The council will monitor the effectiveness of the scheme against a defined set of measurable aims, including:

- targeted risk-based inspections to be undertaken in 50% of licensed properties within the five-year scheme (approximately 11,000)
- an increase in licensing compliance rates within designated areas to above 80%
- reduction in the proportion of PRS properties containing Category 1 and high Category 2 hazards from estimated 17.5% to 12.5% (reduction of 5%)
- reduction in tenant complaints relating to housing conditions
- increased rates of early hazard identification and intervention within PRS.

Baseline data has been established using pre-designation evidence, and progress will be reviewed annually. This will ensure that the scheme remains accountable, transparent, and responsive to emerging issues, and will inform any future decisions on continuation or modification.

7.4. Wider benefits of the scheme

1. Improve housing conditions

- Licensed properties are effectively monitored, with licence conditions enforced.
- Category 1 and 2 hazards (including damp and mould) are identified and addressed.
- Effective use of powers under Parts 2 and 3 of the Housing Act 2004.
- Improved tenant health, safety, and wellbeing.
- Enhanced understanding of the PRS, enabling targeted enforcement and support.

2. Improve management standards

- Landlords actively manage their properties or are subject to enforcement action.
- Unsuitable or absentee landlords appoint competent managing agents.
- Reduction in overcrowding through improved property oversight.
- Increased landlord accreditation and professionalism.
- Improved engagement between the council and landlords.
- Landlords are kept informed of legislative changes and best practice.
- Responsible landlords receive support; non-compliant landlords are compelled to improve.

3. Reduce anti-social behaviour

- Reduction in persistent and serious ASB linked to PRS properties.
- Partnership working to proactively address high-risk areas.
- Improved landlord capacity to manage tenant behaviour.

- Reduction in environmental nuisance.
- Safer, more attractive neighbourhoods.

4. Increase tenant awareness

- Greater awareness of licensing schemes and tenant rights.
- Access to advice via the council website and partner organisations.
- Improved signposting to support services.
- Enhanced tenant support through third-party collaboration.
- Reduced energy costs and potential alleviation of fuel poverty.

5. Strengthen resident engagement

- Licensing empowers residents to raise concerns about property standards.
- Increased accountability for landlords and property managers.
- Improved community confidence through transparent and consistent enforcement.

8. Necessity and proportionality of proposed scheme

The Royal Borough of Greenwich considers that implementing a new Selective Licensing Scheme is necessary and proportionate because the evidence we have obtained demonstrates a persistent and material problem of poor housing conditions within the PRS which cannot be effectively addressed at the required scale through complaint-led or case-by-case enforcement alone.

As outlined by the independent PRS stock review (validated against local inspection data) around 17.5% of the PRS (approximately 5,360 properties- excluding HMO) are likely to contain at least one serious hazard with estimated hazard prevalence in proposed wards materially above the national benchmark. Operational intelligence derived from property inspections indicates risks that are both significant and recurrent. In areas of higher deprivation, residents are more vulnerable to the impacts of poor housing and less likely to raise complaints promptly, reinforcing the need for a proactive, systematic mechanism to identify and address hazards early.

The proposed scheme is lawful and proportionate under Part 3 of the Housing Act 2004 (including s.80), which enables designations where statutory conditions (including poor housing conditions and deprivation) are met and licensing will contribute to improving social and economic conditions, subject to proper consultation and consideration of representations. The council has designed a targeted, evidence-led approach comprising three proposed designations, including a partial-ward approach in Woolwich Arsenal to reflect materially different risk profiles within the ward, and the exclusion of wards where the statutory grounds are not evidenced, thereby ensuring that regulatory burdens fall only where justified by the evidence.

Although the proposed scheme would cover around 70% of the borough's PRS, the evidence explains that this reflects the distribution of risk and avoids displacement of non-compliant practice into non-designated areas, while remaining tailored through the tiered designation structure.

The council's approach also aligns with Government guidance (effective 23 December 2024) requiring a robust evidence base, necessity and proportionality, strategic fit, consideration of alternatives, and a minimum 10-week consultation, with the General Approval 2024 removing the former "20%" confirmation threshold but retaining the need to satisfy all statutory safeguards.

Additionally, the Royal Borough of Greenwich considers that selective licensing is proportionate because it is time-limited and operates within established legal constraints, including statutory exemptions and a cost-recovery fee approach. Exemptions apply as a matter of law (including specified exempt tenancies/licences), ensuring licensing is not imposed where Parliament has determined it should not apply.

As outlined in 4.7, the council has considered alternative interventions (Part I enforcement, civil penalties/prosecutions, voluntary accreditation, ASB/nuisance and public health powers, and national reforms) and identified that these tools are predominantly reactive, rely heavily on tenant reporting, and lack the ability to create comprehensive, area-based intelligence and preventative oversight at scale; licensing uniquely establishes a clear duty to apply, enables consistent enforceable conditions and fit-and-proper assessment, and supports targeted, risk-based inspection and early intervention.

In these circumstances, the council considers that the evidence presented supports the conclusion that selective licensing is a necessary and proportionate response to the documented scale, concentration and persistence of poor PRS conditions in Royal Greenwich.

9. Proposed licence conditions

All licences issued under the proposed scheme will include mandatory conditions set out in the Housing Act 2004. These are basic legal requirements that apply to all licensed properties.

In addition, the council is proposing to include further conditions to make sure that properties are managed properly and provide a safe and suitable living environment for tenants. These additional conditions will help ensure consistent standards across all licensed homes.

Details of the proposed licensing conditions are provided in the section below in Appendix 2.

10. Proposed licence fees

The proposed licence fee has been set so that it only covers the cost of running the scheme. By law, the council cannot make a profit from licensing. The fee reflects the cost of processing applications, carrying out inspections, enforcing standards, and managing the scheme over its five-year period.

The proposed fee for a selective licence is £974 per property. This would be paid in two stages:

- Part A (£407) – payable at the time of application, covering the cost of processing the application and making a decision on the licence.
- Part B (£567) – payable prior to the licence being issued, covering the cost of inspections, enforcement work, and ongoing monitoring of the scheme.

This is the equivalent to a pro-rata annual fee of £194.80 per year or £16.23 per month.

10.1. Discounts

The council is proposing a 10% discount on the licence fee for landlords who are members of the following accredited landlord organisations:

- National Residential Landlords Association (NRLA)
- National Landlord Association (NLA) Accreditation Scheme
- British Landlords Association (BLA)
- Private Rented Sector Accreditation Scheme (PRSAS)
- London Landlords Accreditation Scheme (LLAS)
- DASH Services (Decent and Safe Homes)
- Propertymark (ARLA Propertymark)
- Safeagent

10.2. Fee benchmarking

The council has compared its proposed licence fee with those charged by other London boroughs that operate selective licensing schemes.

Across London, fees vary depending on local costs. In the examples reviewed, Lewisham has one of the lowest fees at £630, while Lambeth has one of the highest at £1,025. The proposed fee for the Royal Borough of Greenwich is £974, which sits within this range.

London borough (as listed)	Selective licensing fee
Greenwich	£974.00
Barking and Dagenham	£950.00
Bexley	£950.00
Brent	£640.00
Ealing	£750.00
Enfield	£735.00
Hackney	£925.00
Hammersmith and Fulham	£755.00
Haringey	£705.84
Harrow	£786.00
Havering	£950.00
Islington	£850.00
Lambeth	£1,025.00
Lewisham	£640.00
Merton	£747.60
Newham	£750.00
Redbridge	£997.69
Southwark	£995.00
Tower Hamlets	£897.00

Waltham Forest	£895.00
Wandsworth	£885.00
Westminster	£995.00

Table 10. Fee benchmarking list.

11. Conclusion

The council has made sustained efforts to raise standards in the Private Rented Sector through a mix of enforcement action, partnership work with landlords, and other regulatory and voluntary interventions. However, the evidence set out in this report indicates that serious hazards and poor housing conditions remain a significant issue in parts of the borough, extending beyond the areas currently covered by selective licensing. Many existing powers are most effective once a problem has already been identified, often through complaints or case-by-case intelligence, which means hazards are not always detected early, particularly where residents feel unable or reluctant to report concerns. As a result, current approaches are frequently reactive, resource-intensive, and reliant on tenant engagement, which can be inconsistent and may exclude those most vulnerable or least able to advocate for themselves.

Selective licensing is proposed because it offers a more consistent, structured and proactive approach to addressing these systemic limitations. By requiring landlords to apply for a licence and comply with clear conditions, it sets a baseline expectation for property condition and management, enables routine monitoring and improved intelligence, and supports targeted, risk-based deployment of council resources. Crucially, it shifts the emphasis from responding after harm has occurred to preventing poor conditions through greater accountability and ongoing oversight.

Other measures will continue to form an important part of the council's wider regulatory toolkit and will be used alongside licensing. However, they do not provide the comprehensive, area-based coverage or preventative capacity needed to achieve meaningful, sustained improvements at the scale and distribution identified in the evidence. In this context, selective licensing represents the most effective and proportionate intervention available, offering the greatest potential to deliver lasting improvements in property conditions and management standards in the proposed designation areas and to better protect residents across the borough.

12. Next steps

The council will carefully consider all feedback received during this consultation before making a final decision.

If the scheme is approved, it is expected to be introduced from spring 2027.

Thank you for taking the time to read this report and share your views.

13. Appendices

- Appendix 1- Housing Stock Condition and Stressors Report (HSCR)
- Appendix 2- Proposed Selective Licensing Conditions
- Appendix 3- Fees and Charges document
- Appendix 4- Selective Licensing Case Studies
- Appendix 5 – Selective Licensing Summary Document