NORWICH
City Council

Committee name: Scrutiny

Committee date: 06/08/2026

Report title: Private Rented Sector Housing in Norwich

Portfolio: Councillor Stutely, Cabinet Member for Planning and Regulatory

Report from: Head of planning and regulatory services

Wards: All

OPEN PUBLIC ITEM

Purpose

This report presents an overview of the challenges identified within Norwich's private rented sector (PRS) and outlines the range of regulatory and strategic responses available to the Council.

Recommendation:

It is recommended that the Scrutiny Committee:

- Review, note and comment on the report.

Executive Summary

This report sets out the Council's current understanding of challenges within Norwich's private rented sector (PRS), drawing on analysis of housing conditions, property management, and wider impacts on communities, including anti-social behaviour and health inequalities.

The evidence indicates that, in some parts of the city and across certain property types, issues such as poor housing conditions, inconsistent management standards, and high tenant turnover continue to place pressure on residents, neighbourhoods, and Council services. These challenges also interact with wider strategic priorities relating to community safety, public health, housing quality, and reducing inequality.

A range of regulatory tools are available to the Council to address these issues. The report outlines these, including the use of existing enforcement powers and the potential introduction of discretionary licensing under the Housing Act 2004.

Policy framework

The Council has five corporate priorities, which are:

- An open and modern Council.
- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.

This report meets the fairer, climate responsive and future-proof Norwich corporate priorities.

Report details

Introduction

Norwich's Private Rented Sector (PRS)

1. Over the past year, the council has undertaken a thorough review of the data held on private housing across the city. As part of this work, we commissioned an in-depth assessment of the Private Rented Sector and Houses in Multiple Occupation (Ti Report at Appendix 2), focusing on stock condition and the pressures affecting private sector tenants and our wider communities.

Overall

2. The private rented sector in Norwich has expanded rapidly and now includes more than 20,300 properties. This represents growth from 23% of all housing in 2011 to 29% in 2025.

3. In most (11 of 13) of our wards the proportion of privately rented homes exceeds the national average of 19%.

4. Our private rented sector also contains a higher percentage of properties with at least one serious hazard compared with the national picture. We estimate that around 2,286 privately rented homes in Norwich present at least one serious safety risk.

5. Conditions in HMOs are even more concerning, with serious hazards estimated to affect over 20% of these properties.

6. Despite clear under-reporting, anti-social behaviour incidents linked to HMOs are three times the rate of other privately rented homes

7. More than 10% of private rented homes fall into the three lowest energy-efficiency bands which is of particular concern given Norwich's higher-than-average levels of fuel poverty.

The size of the PRS in Norwich

8. The latest available figures (2024) show a population of 147,182, so

between 2011 and 2024 the population grew 11.4%.

9. There are 69,441 residential properties in Norwich, of these, 29.3% (20,330) are PRS.

10. The PRS has increased from 23% of housing stock in 2011 to 29% in 2025.

11. The number of PRS per ward in Norwich ranges from 714 – 2,961.

12. Of the 13 Norwich Council wards 11 have a higher percentage PRS than the national average (19%).

13. Houses (55%) and Flats (38%) make up the majority of PRS property types.

14. The highest number of PRS are in Mancroft (2,961), and Thorpe Hamlet (2,790); the lowest are in Crome (714).

15. The percentage of PRS properties in each ward ranges between 13.5% (Crome) and 42.4% (Thorpe Hamlet).

Rent and Repossession

16. Over the last 12 quarters (to end Sep 2025) the average rented property possession rate was 9.8 per 10,000. The average number of claims for authorities in England for the same 12 quarters was 8.4 per 10,000.

17. The overall average monthly rent in Norwich is £1,139 (Oct 2025). The (overall) average for England is £1,416.

PRS Housing Conditions and Complaints

18. There are 2,286 PRS properties with at least one serious home hazard (HHSRS A–D) in Norwich, which is 11.2% of the PRS stock (the national average is 10%).

19. The highest number (376) of PRS properties with serious hazards are in Nelson, whilst the lowest number (39) are in Bowthorpe.

20. In the period 1st April 2020 – 31st March 2025 there were 670 complaints made at PRS dwellings across Norwich.

21. Mancroft (90) had the highest number of private housing complaints, whilst the lowest (14) was in Eaton.

22. In the period 1st April 2020 – 31st March 2025 Norwich issued 1,690 notices to PRS addresses in the city.

23. The highest number of notices served were in University (444), and Nelson (241).

24. Over the period 1st April 2020 – 31st March 2025 a total of 664 ASB incidents were recorded at PRS dwellings across Norwich (a rate of 3.3 ASB incidents per 100 PRS).

25. University (98) had the highest numbers of recorded ASB incidents, whilst Lakenham (30) had the lowest.

Energy Efficiency

26. Norwich has 1,961 (10.5%) PRS properties with EPC records that are E, F, & G rated (10.5%).

27. The housing stock is dominated by EPC ratings C & D (82.5%), with fewer B & E ratings (combined 16.7%). The A, F & G ratings are the least common (combined 0.8%).

Houses in Multiple Occupation (HMO)

28. Overall numbers of HMOs (licensed and smaller) are calculated to be 2,343 (excluding purpose-built student accommodation).

29. Overall Norwich's percentage of HMOs is over six times the England average and comparable with other local authorities that have the highest percentages of HMOs such as London boroughs and other university cities such as Oxford, Cambridge, Bristol and Nottingham.

30. HMO properties form 11.5% of PRS dwellings (20,330), and 3.4% of all dwellings (69,441) in Norwich.

31. The highest number of HMOs are in University (541), the lowest (57) are in Lakenham, and Crome.

32. There are 1,206 known HMOs (mandatory HMO licence) across Norwich.

33. The highest number of licensed HMOs are in University ward (420), whilst the lowest are in Crome (10).

34. It is predicted that there are 1,137 unlicensed (smaller) HMOs across Norwich (48.5% of HMOs).

35. The highest number of hidden HMOs are in Nelson (142), whilst the lowest is in Lakenham (44).

36. Crome has the highest percentage of smaller HMOs (82.5%), whilst the lowest is in University ward (22.4%)

37. Houses make up most of the HMO stock (96.9%), whilst maisonettes form the lowest (0.4%).

HMO hazards, conditions and complaints

38. There are 470 HMO properties in Norwich that are likely to have at least 1 serious housing hazard (HHSRS A – D, 20% of HMOs), the PRS national average is 10%.

39. Nelson (89) and University (90) have the highest number of HMOs with serious hazards.

40. The overall hazard rate is 20.1 (HHSRS A – D) per 100 HMO properties.

41. The highest hazard rate is in Thorpe Hamlet (38.5 serious hazards per 100 dwellings), whilst the lowest is in Bowthorpe (4.6).

42. In the period 1st April 2020 – 31st March 2025 there were 74 private housing complaints made at HMO (known and hidden) properties across Norwich.

43. University (22) had the largest number of complaints at HMOs.

44. In the period 1st April 2020 – 31st March 2025 Norwich issued 1,237 notices to HMO addresses in Norwich city.

45. The highest number of private housing notices served to HMO properties were in University ward (426), whilst the lowest number were in Crome (12).

Energy Efficiency in HMOs

46. The HMO stock is dominated by EPC ratings C & D (87.4%), with B & E ratings much less so (11.7%).

47. Norwich has 249 HMO EPC records that are E, F, & G rated (10.6% of all HMOs).

HMOs and antisocial behaviour

48. Overall, there were 228 ASB incidents linked to known and hidden/predicted HMOs, a rate of 9.7 ASB incidents per 100 HMO dwellings.

49. The most ASB (79) reports were in University ward, followed by Wensum (24).

Report Detail

Growth and concentration of the PRS

50. Norwich's PRS has expanded significantly, now representing approximately 29.3% of all housing stock, increasing by 27% between 2011 and 2021 (Census data), with continued growth to an estimated 20,330 dwellings by 2025 - suggesting an overall increase of around 48% in stock since 2011.

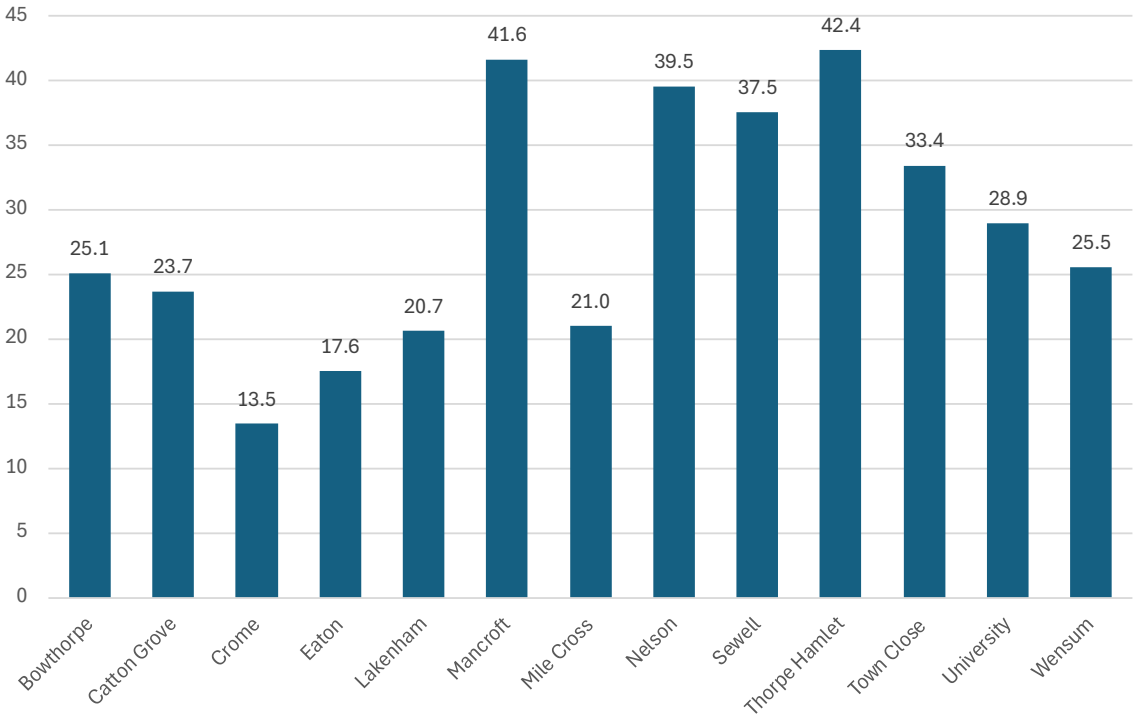
Table 1. Numbers of households and dwellings by tenure type in Norwich 2011—2024 (Source: ONS & TI 2025).

Tenure	2011 (households)	2021 (households)	2025 (dwellings)
Owner Occupied	26,875	27,472	28,581
Social Housing	19,702	19,518	20,530
PRS	13,742	17,467	20,330

Total:	60,319	64,457	69,441

51. Wards such as Thorpe Hamlet, Nelson, Sewell, Town Close and Mancroft display PRS proportions ranging from 33% to over 42% of total dwellings. These levels are far higher than regional averages and create neighbourhood environments where management standards and high property turnover have substantial impacts on community stability.

52. **Figure 1**. Percentage of PRS across wards in Norwich (Source: Ti 2025)



53. The modelling shows that PRS growth has been accompanied by increases in Category 1 and high-risk Category 2 hazards, (see Appendix 1 for more detail on the hazards categories) poor energy efficiency, and elevated rates of management problems in certain neighbourhood clusters. The density of PRS accommodation, combined with ageing housing stock, is a key driver of risks that disproportionately affect vulnerable households, including low-income renters, students, young professionals, migrants and those with complex needs.

Property condition and safety concerns

54. The Housing Health and Safety Rating System (HHSRS) is a system for assessing housing conditions. A hazard is any risk of harm to the health or safety of an actual or potential occupier of accommodation that arises from a deficiency in the dwelling, building or land in the vicinity

55. A summary explanation of each hazard is provided in Appendix 2.

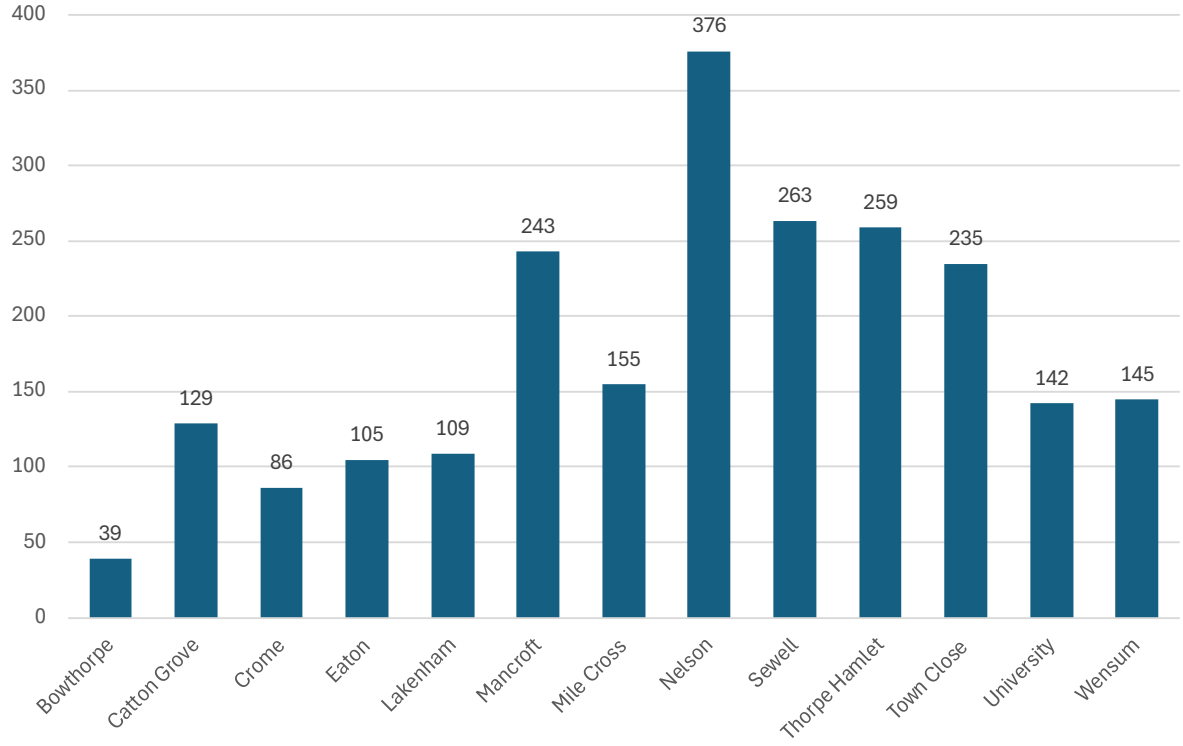
56. Note: The HHSRS was amended in June 2026, reducing the number of hazard categories from 29 to 21, and replacing lettered banding (A-J) with High, Medium and Low categories.

57. The TI report identifies a number of wards above the national PRS average of 10% of privately rented homes containing at least one serious hazard.

Table 2. Total dwellings, PRS and HHSRS Hazards (category A – D) at PRS across Norwich 1st April 2020 – 31st March 2025 (Source: TI 2025).

Ward	Total dwellings	PRS	PRS %	Hazards	Hazard %
Bowthorpe	4368	1096	25.1	39	3.6
Catton Grove	5128	1213	23.7	129	10.6
Crome	5306	714	13.5	86	12.0
Eaton	4689	823	17.6	105	12.8
Lakenham	5136	1061	20.7	109	10.3
Mancroft	7111	2961	41.6	243	8.2
Mile Cross	5070	1065	21.0	155	14.6
Nelson	5227	2064	39.5	376	18.2
Sewell	5289	1985	37.5	263	13.2
Thorpe Hamlet	6580	2790	42.4	259	9.3
Town Close	5619	1878	33.4	235	12.5
University	4395	1271	28.9	142	11.2
Wensum	5523	1409	25.5	145	10.3
Total	**69,441**	**20,330**	**370**	**2,286**	**147**

Figure 1. PRS properties with serious hazards (HHSRS A-D) across Norwich (Source: Ti 2025).



58. Many of these hazards are linked to poor maintenance, inadequate heating or insulation, and insufficient fire safety measures. The Safer Norwich

Strategy emphasises the need for prevention and early intervention to reduce harm, recognising the importance of understanding the societal drivers of crime and ASB, including unsafe or poorly managed housing environments.

59. Without a systemic intervention, these issues could continue to reproduce cycles of poor health, community instability and avoidable risk. This undermines the Council's aspirations for safe, resilient communities and directly contributes to higher demand on enforcement, environmental health and community safety services.

Energy efficiency and fuel poverty

60. Low energy efficiency is a significant problem in Norwich's PRS. The data identifies large volumes of PRS properties with low EPC ratings across the city as shown by the graph in figure 3.

Figure 3. PRS properties with EPC ratings E - G by ward in Norwich (Source: Ti 2025).

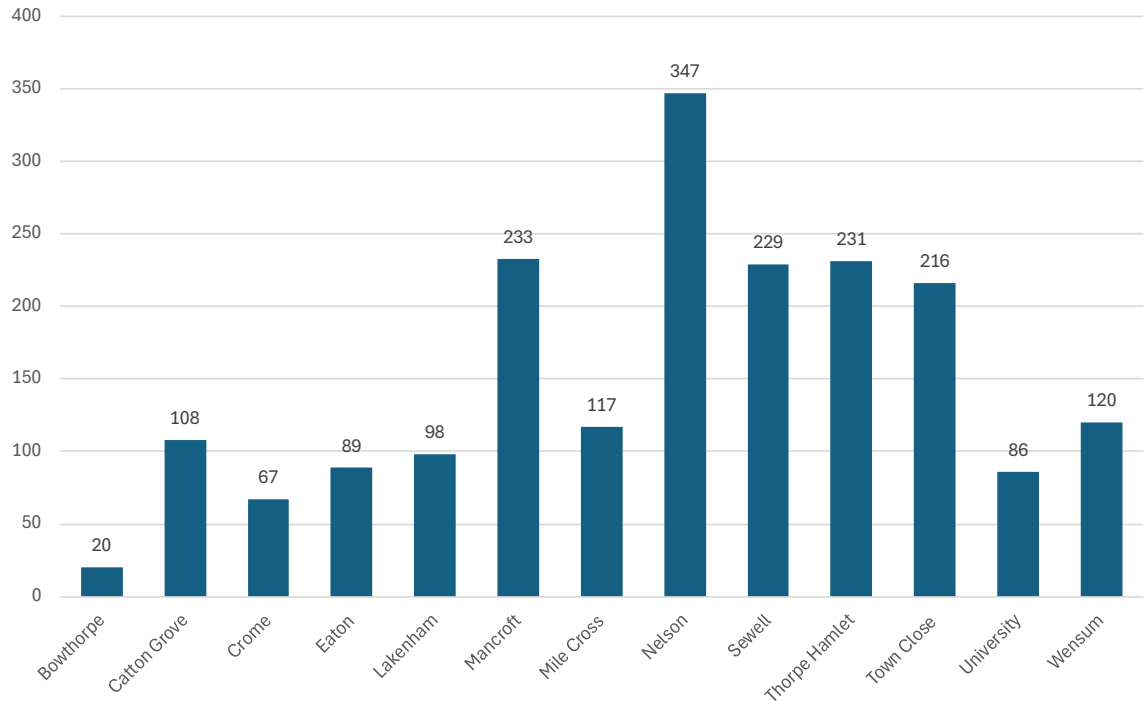
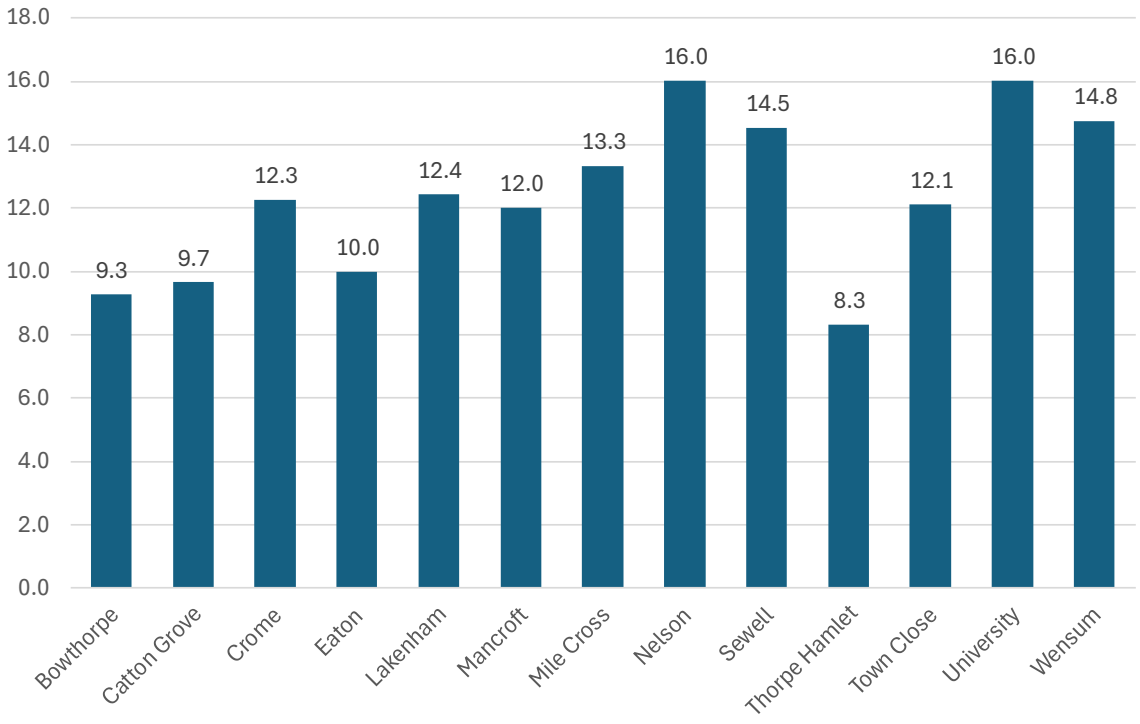


Figure 4. Percentage of households in fuel poverty by ward in Norwich (After Housing Costs, Source: Dept. for Energy Security & Net Zero 2025, Cited in MetaStreet TI Report). The national average is 11.4%.



Anti-Social Behaviour, Crime and Neighbourhood Stability

61. PRS dwellings in poor condition, particularly HMOs or subdivided flats, often exhibit inadequate management and insufficient oversight. Issues such as overcrowding, poorly maintained communal areas, and insecure doors or windows contribute to vulnerability, crime opportunity, and neighbourhood disorder. The data shows high ASB counts in wards such as Bowthorpe (164 ASB cases), Nelson (160), and University (426), reinforcing the relationship between local ASB problems and PRS/HMO concentration.

62. The Safer Norwich Strategy identifies reducing neighbourhood crime and ASB as a core priority for the city, noting the importance of coordinated action across partners to tackle the causes of disorder and to increase residents' feelings of safety. Raw ASB data from Norfolk Constabulary also demonstrates persistent geographic clusters of ASB across multiple Norwich Lower Super Output Areas (LSOAs), particularly in areas where PRS density is highest.

63. While the TI modelling remains the primary evidence source, these granular crime records reinforce the strategic picture: several areas of Norwich experience sustained ASB pressures linked to housing conditions, high turnover populations, and poor management in parts of the PRS.

64. Given the evidence of management failings, and the city's strategic priority to reduce ASB, discretionary licensing would offer a preventive and

structured mechanism to ensure landlords take responsibility for their properties and tenants.

Health, Wellbeing, and Inequality

65. Poor quality PRS accommodation is strongly correlated with respiratory illness, mental health issues, accidents and falls, and increased vulnerability to harm. Norwich's Health & Wellbeing Partnership Plan emphasises the importance of secure housing, local community spaces and robust support for mental health and wellbeing, noting that good housing is foundational to resilience and quality of life for residents.

66. Hazardous housing conditions, including damp, mould, excess cold, poor fire safety and electrical risks, exacerbate health inequalities. Student-heavy areas, migrant communities, and low-income families living in the PRS are especially vulnerable.

Why Further Intervention May be Required

67. The Council currently uses a range of statutory powers to respond to poor housing conditions and management issues within the private rented sector. These include inspections, enforcement notices, and financial penalties.

68. While these tools are effective in addressing individual cases of non-compliance, they are primarily reactive and often dependent on tenant complaints or identified breaches. This can limit their effectiveness in addressing issues that are more widespread or systemic in nature.

69. In addition, enforcement activity can be resource-intensive, which may constrain the Council's ability to undertake proactive inspection or preventative work at scale.

70. The challenges identified within the PRS contribute to wider pressures on Council services, including recycling and waste management, environmental health, community safety, and homelessness support. They are also relevant to broader strategic priorities relating to improving housing quality, reducing inequality, and supporting safe and stable communities.

71. Without effective intervention, these pressures may persist or increase over time, particularly in areas where issues are already more concentrated.

72. Given the scale and nature of the issues identified, there is a case for considering whether a more proactive and structured approach may be required to improve standards across parts of the private rented sector.

73. A range of options are available to the Council, including strengthening existing enforcement activity and exploring regulatory approaches such as discretionary licensing. These options vary in their potential impact, cost, and complexity, and are considered further in the following sections.

74. If the current approach remains unchanged, there is a risk that:

- Poor housing conditions will persist in parts of the PRS.

- Pressures on Council services will continue or increase.
- Neighbourhood-level issues, including anti-social behaviour, may remain concentrated.
- Progress against wider strategic priorities relating to housing, health, and community safety may be constrained.

75. Further detail, including methodology, ward-level analysis, and full datasets used to inform this assessment, is provided in Appendix 2.

Options Appraisal

76. This section sets out a range of potential approaches the Council could take to address the challenges identified within the private rented sector (PRS). These options are not mutually exclusive but represent different levels of intervention, each with distinct implications in terms of effectiveness, resource requirements, and impact on landlords and tenants.

Option 1: Continue with current approach

77. Maintain the existing approach to regulating the PRS using current statutory powers, including complaint-led inspections, enforcement notices, civil penalties, and other regulatory interventions.

78. Potential Benefits:

    - No additional administrative or regulatory burden on landlords or tenants.
    - Avoids introducing new processes or requirements.
    - Allows the Council to continue focusing resources on known high-risk cases.

79. Limitations:

    - Primarily reactive, relying on complaints or identified breaches.
    - May not effectively address issues that are widespread or systemic across parts of the PRS.
    - Tenant underreporting may mean that some hazards and management issues remain unaddressed.
    - Does not provide a mechanism for establishing consistent, sector-wide management standards.

80. Key Consideration:

    - This approach maintains the current operating model but may limit the Council's ability to address challenges at scale or take a more preventative approach.

Option 2: Strengthened or Enhanced Enforcement Approach

81. Expand the use of existing enforcement powers through increased inspection activity, targeted interventions in higher-risk areas, and proactive engagement with landlords, without introducing a formal licensing

framework.

82. The Renters' Rights Act 2025 has introduced significant reforms to the private rented sector, including the abolition of Section 21 "no-fault" evictions, stronger protections against unfair rent increases, improved rights for tenants, a new Private Rented Sector Ombudsman, and the introduction of a national landlord database. The Act aims to strengthen the ability of local authorities to act against non-compliant landlords.

83. Potential Benefits

- Builds on existing powers and officer expertise.
- Can target known hotspots or higher risk properties.
- Offers a more proactive approach compared to the baseline.
- Avoids introducing a new regulatory regime.

84. Limitations

- Requires additional Council resources and funding to scale activity.
- Does not provide a sustainable cost recovery mechanism.
- Limited ability to apply consistent requirements across the sector.
- May still struggle to address systemic issues where problems are widespread or where properties are not already known to the Council.
- While the Renters' Rights Act 2025 strengthens tenant rights and increases national protections, discretionary property licensing provides a complementary local mechanism for proactive regulation of the private rented sector. Licensing enables the council to identify and inspect properties systematically, establish minimum management and property standards, improve landlord accountability, address wider issues such as anti-social behaviour and fuel poverty, and deliver sustained enforcement activity through a cost-recovery model. For these reasons, discretionary licensing may continue to provide benefits beyond those achieved through the Renters' Rights Act alone.

85. Key Consideration

- While this approach could increase proactive activity, its effectiveness may be constrained by resource availability and the absence of a structured framework for engaging with the wider PRS.

Option 3: Discretionary Property Licensing

86. There are three types of property licensing –

- Mandatory HMO licensing - is an existing national requirement and covers Houses in Multiple Occupation with 5 or more persons, of which we currently have 910 mandatory HMO premises licensed in Norwich.

87. There are two other forms of discretionary licensing that the council could

adopt subject to establishing the required evidence and carrying out a full statutory consultation.

- Additional licensing (Part 2, Housing Act 2004) applies to Houses in Multiple Occupation (HMOs) not covered by mandatory licensing, allowing councils to license smaller 3-4 person HMOs where there is evidence of poor management or housing conditions.

- Selective licensing (Part 3, Housing Act 2004) applies to other privately rented homes in a defined area, where broader issues such as poor property conditions, anti-social behaviour, or deprivation meet statutory criteria.

88. The council could seek to introduce a discretionary licensing approach under the Housing Act 2004 to regulate parts of the private rented sector through a structured framework requiring landlords to obtain a licence and meet defined standards.

89. This could apply to different parts of the PRS, including Houses in Multiple Occupation (HMOs) and other privately rented properties, depending on the nature and distribution of issues identified.

90. It should be noted that Property Licensing is about improving standards and management not controlling numbers and locations of premises.

Potential Coverage

91. The findings from the stock condition report and other factors indicate that a substantial proportion of HMOs and other privately rented homes are not being managed to a standard that protects either their occupants or the wider community.

92. The evidence would suggest that the Council could consult on the introduction of a city-wide additional licensing scheme for three to four person houses in multiple occupation (HMOs) and potentially up to four wards (Nelson, Mile Cross, Town Close and Sewell) meet the criteria for the introduction of selective licensing for single or dual households in the private rented sector.

93. The main benefits of discretionary property licensing (Additional or Selective Licensing under the Housing Act 2004) are that it:

A. Improves Housing Standards

- Licensing creates a framework for ensuring privately rented properties meet minimum standards of safety, condition and management. It can help identify hazards earlier and promote more consistent property management standards across the sector.

B. Moves the Council from Reactive to Proactive Enforcement

- Rather than relying solely on tenant complaints, licensing allows councils to take a preventative approach through inspections,

compliance checks and engagement with landlords. This is particularly valuable because many housing problems remain unreported because tenants fear repercussions or are unaware of their rights.
- Licensing allows councils to identify and inspect properties systematically rather than waiting for complaints.

C. Supports Tenant Health and Safety

- Licensing can reduce Category 1 and serious Category 2 hazards, improve compliance with fire, gas and electrical safety requirements, and ensure better housing management practices.

D. Tackles poor and criminal Landlords

- Licensing provides a mechanism to identify and regulate poorly performing landlords and property managers, raising standards across the private rented sector. It also gives councils stronger oversight of who is operating in the sector.

E. Helps Reduce Anti-Social Behaviour (ASB)

- Government guidance specifically recognises licensing as a tool for addressing areas affected by persistent ASB. Better property management and landlord engagement can help reduce neighbourhood problems.

F. Supports Homelessness Prevention

- Better managed and better maintained private rented homes can reduce tenancy breakdowns and homelessness caused by poor conditions or landlord management failures. Norwich's draft work identifies this as a significant potential benefit.

G. Creates a Sustainable Enforcement Model

- Licensing schemes generally operate on a full cost recovery basis, allowing councils to recover reasonable administration and enforcement costs through licence fees. This can provide resources for ongoing compliance and enforcement activity without relying on the general fund.

H. Improves Data and Intelligence

- Licensing provides councils with more comprehensive information about landlords, rented properties and management arrangements, enabling more targeted enforcement and policy responses.

I. Supports Wider Strategic Objectives such as:

- Improved community wellbeing
- Reduced health inequalities
- Neighbourhood regeneration

- Fuel poverty reduction
- Better energy efficiency
- Safer communities

94. Limitations

    - Can Introduce additional regulatory requirements and costs for landlords, which may have indirect impacts on tenants.
    - Requires significant upfront implementation capacity and ongoing administration.
    - Dependent on achieving sufficient compliance levels to be effective.
    - Potential for legal or reputational challenge if not supported by robust evidence and consultation.
    - Outcomes are dependent on effective enforcement and engagement.

95. Key Consideration

    - Discretionary licensing represents a more comprehensive and structured intervention but introduces additional complexity, cost, and delivery requirements that would need to be carefully assessed.

96. Licensing introduces additional regulatory requirements and costs for landlords. While these are intended to support improved standards, there may be concern that:
    - Costs could be passed on to tenants through rent increases.
    - Landlords could exit parts of the market.
    - Investment decisions are affected in ways that reduce housing supply.

97. However, it should be noted that the 2019 report commissioned by the Government “An Independent Review of the Use and Effectiveness of Selective Licensing” found no evidence to support the claim that licensing has had a demonstrable effect on rent levels.

98. Discretionary licensing requires significant organisational capacity, including:
    - Administration of applications.
    - Inspection and compliance activity.
    - Ongoing enforcement.

99. Successful scheme(s) delivery to improve property conditions and management depend on a range of factors, including:

    - Scheme design
    - Close management and monitoring
    - Levels of compliance
    - Enforcement approach
    - Wider housing market dynamics

Implementation of Discretionary Property Licensing

100. The following process lays out the mechanism through which a local authority can implement Discretionary Property Licensing under the

Housing Act 2004.

i) Evidence and Review: The Council reviews housing conditions and develops an evidence base to understand the scale and nature of issues within the private rented sector, and whether statutory criteria for licensing may be met.

ii) Consideration of Options: Alternative approaches are assessed, including the use of existing enforcement powers, to determine whether licensing is a viable response.

iii) Development of Proposal: A proposal is prepared, including the potential type of licensing (Additional, Selective or both), geographic scope, and provisional design (such as licence conditions and fees).

iv) Statutory Consultation: A formal consultation is undertaken (minimum 10 weeks) with landlords, tenants, residents, and partner organisations to gain an understanding of views on evidence, rationale, type of licensing, geographic coverage and fees.

v) Consideration of Responses: Consultation responses are reviewed and inform a further report to Cabinet, which decides whether to proceed and the final design of any scheme.

vi) Implementation and Operation: If approved, the scheme is formally designated, requiring landlords to obtain licences and meet defined standards. The Council then administers, enforces, and monitors the scheme over its duration (typically up to five years).

Links to wider strategies and policies

101. This report and the conditions in our local private rented sector also relate to a variety of council policies and strategies including:

102. The Greater Norwich Local Plan (GNLP) strengthens this position through Policy 2 (Sustainable Communities), which requires development to deliver healthy, energy efficient, climate resilient homes that support community wellbeing. Improving existing PRS stock through licensing aligns directly with these objectives, which aim to ensure homes contribute positively to health and sustainability outcomes.

103. The Safer Norwich Strategy identifies reducing neighbourhood crime and ASB as a core priority for the city, noting the importance of coordinated action across partners to tackle the causes of disorder and to increase residents' feelings of safety. Raw ASB data from Norfolk Constabulary also demonstrates persistent geographic clusters of ASB across multiple Norwich LSOAs, particularly in areas where PRS density is highest.

104. The Safer Norwich Strategy also emphasises a public health approach to understanding and addressing the societal factors driving ASB, including the lived experiences of both victims and perpetrators, and the necessity of strong, coordinated responses across housing, enforcement,

community safety and third sector partners.

105. Poor quality PRS accommodation is strongly correlated with respiratory illness, mental health issues, accidents and falls, and increased vulnerability to harm. Norwich's Health & Wellbeing Partnership Plan emphasises the importance of secure housing, local community spaces and robust support for mental health and wellbeing, noting that good housing is foundational to resilience and quality of life for residents.

Summary

106. The evidence presented indicates that there are ongoing challenges within Norwich's private rented sector relating to housing conditions, property management, and wider neighbourhood impacts.

107. A range of potential responses are available, each with different implications, benefits and risks. Discretionary licensing represents one possible approach, but its appropriateness and proportionality require careful consideration and consultation.

108. The Tenure Intelligence (TI) modelling (Appendix 1: Tenure Intelligence (TI) Norwich Report) commissioned by Norwich City Council provides evidence of concentrations of poor property conditions, management failings, and associated anti-social behaviour (ASB). These problems undermine the Council's strategic ambitions, place pressure on statutory services, and directly impact resident safety, health, and wellbeing.

109. Norwich faces a combination of structural housing challenges, rising private rented sector (PRS) demand, neighbourhood level issues, and widening inequalities that together present a significant and urgent case for targeted intervention in the PRS. A substantial proportion of the city's population relies on privately rented accommodation, particularly in central and lower income wards.

110. The Council currently utilises a range of regulatory powers under the Housing Act 2004 and related legislation to address these issues. These include property inspections, enforcement action, and the use of civil penalties. While these tools are effective in addressing individual cases, they are largely reactive and resource-intensive and may be less effective in addressing issues that are widespread or systemic in nature.

111. Taken together, the available evidence suggests that, while many landlords and properties within the PRS are well managed, there remain persistent challenges across parts of the sector. These challenges align with wider strategic priorities for the Council, including improving housing quality, reducing health inequalities, supporting community safety, and creating more stable and sustainable neighbourhoods.

112. Discretionary property licensing can provide a proactive, evidence-led mechanism for improving standards within the private rented sector. It enables earlier identification of housing hazards, strengthens landlord accountability, supports tenant safety and wellbeing, helps tackle anti-social behaviour, contributes to homelessness prevention, and allows councils to deliver sustained regulatory activity through a cost-recovery model.

Licensing can therefore support wider objectives relating to health, community safety, housing quality and neighbourhood improvement.

113. This context provides the basis for considering whether additional or alternative approaches may be required to address these issues more proactively and at scale.

114. The views of the Scrutiny Committee will inform the development of future proposals.

Legal

115. The Council's powers in relation to discretionary property licensing are set out in the Housing Act 2004, specifically:

- Part 2 (Additional licensing), relating to Houses in Multiple Occupation not subject to mandatory licensing.

- Part 3 (Selective licensing), relating to other privately rented properties within a defined area.

116. Under the Act, the Council is required to keep housing conditions in its area under review and to consider appropriate action where issues are identified. Any decision to introduce discretionary licensing must satisfy statutory conditions, including demonstrating that:

- The relevant criteria for designation are met.
- There are no more effective and proportionate alternative courses of action available.
- The proposed designation will contribute to the achievement of clearly defined objectives.

117. The Council is also required to undertake a statutory consultation with persons likely to be affected by any proposed designation for a minimum period of 10 weeks, and to have regard to any representations made before taking a final decision.

118. At this stage, no legal decision is being sought. Any future proposal to introduce discretionary licensing would be subject to further legal advice and a subsequent report to Cabinet, including consideration of consultation outcomes, statutory tests, and proportionality.

119. In developing any future proposals, the Council would also need to ensure compliance with relevant legal duties, including those under section 149 of the Equality Act 2010 and those under the Human Rights Act 1998, particularly in relation to proportionality, fairness, and the potential impact of regulatory intervention on landlords and tenants.

Statutory considerations

Consideration	**Details of any implications and proposed measures to address:**
Equality and diversity	Poor quality private rented accommodation can adversely affect specific groups. Barriers such as language, fear of eviction and insecure circumstances may reduce reporting of poor conditions. A full EQIA would be prepared before adopting any new proposals.
Reducing Inequality Target Areas (RITAs)	Low-income households, including those living within the Council's Reducing Inequality Target Areas (RITAs), are disproportionately reliant on the PRS and more exposed to poor housing conditions, fuel poverty and health inequalities.
Health, social and economic impact	Low-income households, are disproportionately reliant on the PRS and more exposed to poor housing conditions, fuel poverty and health inequalities.
Crime and disorder	The PRS in Norwich is linked to increased rates of ASB and indicative of poor property management in the sector.
Children and adults safeguarding	Poor housing conditions can present both children's and adults' safeguarding concerns. Hazards such as damp, mould, excess cold, fire risks, overcrowding and unsafe living environments can adversely affect physical and mental health, increase the risk of accidents and injury, and exacerbate existing vulnerabilities.
Environmental impact	Poor housing conditions can have significant environmental consequences. Properties with low energy efficiency require greater energy consumption for heating and cooling, resulting in higher carbon emissions and increased fuel poverty. Improving housing conditions and energy performance therefore contributes not only to better health and wellbeing outcomes, but also to the Council's wider climate, net-zero and environmental objectives.
Local Government Reorganisation Implications	The data presented in the report has been defined and analysed at ward level. The defined geographic boundaries and condition remain regardless of LGR

Risk management

A full risk and financial appraisal would be developed and considered before any formal decision on the approach going forward is made.

Other options considered

120. Options appraisal features in the main body of this report.

Reasons for the decision/recommendation

121. The recommendation to review and comment is made to enable the Scrutiny Committee to input into options for improvement prior to any formal proposals being developed.

Appendices:

Appendix 1: Summary of the Housing Health and Safety Rating System (HHSRS) Hazards in force Pre June 2026

Appendix 2: Tenure Intelligence (TI) Norwich Report

Background Papers:

The Safer Norwich Strategy:

- https://www.norwich.gov.uk/your-council-explained/policies-plans-and-strategies/safer-norwich-strategy-2023-26

The Norwich Health & Wellbeing Partnership Plan:

- https://www.norwich.gov.uk/downloads/file/9931/norwich_health_and_wellbeing_partnership_strategic_plan_2023-25

The Greater Norwich Local Plan (GNLP):

- Adopted_GNLP_2024_STRATEGY_final_24-10-18_0.pdf

An Independent Review of the Use and Effectiveness of Selective Licensing

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833217/Selective_Licensing_Review_2019.pdf

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