

Background Paper – Needs Assessment – Housing

Last updated: 19 September 2013

1. Policy Background

1.1 National

Key policies and guidance within the National Planning Policy Framework (NPPF) 2012, relevant to housing, are:

- Supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations (para 7).
- Pursuing sustainable development including widening the choice of high quality homes (para 9).
- To boost significantly the supply of housing, local planning authorities should:
 - use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
 - identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against their housing requirements, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land;
 - identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15.
 - for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain deliver of a 5 year supply of housing land to meet their housing target; and
 - set out their own approach to housing density to reflect local circumstances (para 47).
- To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local authorities should:
 - plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);
 - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and

- where they have identified that affordable housing is needed set policies for meeting this need... (para 50).
- Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area (para 53).
- Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs ... and prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period (para 159).

Accompanying the NPPF, the Planning policy for Traveller sites sets out:

- that local planning authorities should make their own assessment of need for the purposes of planning
- to ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- to encourage local planning authorities to plan for sites over a reasonable timescale
- to promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites
- that plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective (there are no unauthorised developments within the Borough at present but this remains relevant)
- for local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies
- to increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- to reduce tensions between settled and Traveller communities in plan-making and planning decisions
- to enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure
- for local planning authorities to have due regard to the protection of local amenity and local environment.

For the guidance, “travellers” means “gypsies and travellers” and “travelling showpeople”.

1.2 Regional

London Plan 2011:

- The Mayor recognises the pressing need for more homes in London.

- Policy 3.3 sets out that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1 – for the borough of Richmond 2,450 homes for 2011-2021.
- Policy 3.4 seeks to optimise housing potential.
- Policy 3.5 seeks high quality design, addressing factors relating to arrival at the building and the home as a place of retreat, including minimum space standards which LDFs should incorporate.
- Policy 3.8 sets out guidance on ensuring housing choice – in terms of affordability and requirements for different sizes and types of dwellings, including inclusive access.
- Policy 3.9 seeks mixed and balanced communities.
- Policy 3.10 sets out the definition of affordable housing and factors for setting targets for affordable housing are set out in Policy 3.11.
- Policy 3.12 sets out that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, and the criteria that should be taken into account.
- Policy 3.13 deals with affordable housing thresholds.
- Policy 3.14 sets out to resist the loss of existing housing, supporting efficient use.

Revised Early Minor Alterations:

- The alterations are aimed at ensuring that the London Plan is fully consistent with the NPPF and incorporate the early minor alterations dealing with national changes to the definition of affordable housing – amending Policies 3.10 and 3.12 to clarify the Mayor’s approach to the new affordable rent product and the affordable housing investment decisions. The Alterations are expected to be adopted in September 2013.

Mayor’s 2020 Vision

The vision sets out the Mayor’s commitment to base the next version of the London Plan on the capital’s need for 400,000 more homes by 2025.

Mayor’s Housing Supplementary Planning Guidance:

Provides detail on how to carry forward the Mayor’s view that “providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods”.

Provides guidance on identifying the different sources of housing supply, bringing together comprehensive design standards, and the overall approach to estimating needs of different sorts; on the role of planning in facilitating private rented housing; and then addresses the requirements of distinct groups. Further details to implement the housing policies in the London Plan to secure affordable housing. Also covers stock and investment, social infrastructure and mixed use development.

1.3 Local Policy

Core Strategy:

Policy CP1 seeks to maximise the effective use of resources including land. Paragraph 8.1.1.4 states that redevelopment will generally only be appropriate if there is a more sustainable construction, a building that will last longer or an improved layout which may include an increase in the number of units or floorspace. **Policy CP14** sets out the Borough’s housing targets and 14.C states residential proposals will be assessed for the contribution to meeting housing need for all sections of the community, including for Gypsies and Travellers.

Core Strategy Policy CP15 expects 50% of all new units will be affordable housing over the LDF period, with a tenure mix of 40% housing for social rent and 10% intermediate housing. This is split into at least 50% on-site provision from sites capable of 10 or more units. From sites below the threshold will be a financial contribution to the Affordable Housing Fund commensurate with the scale of development, and that the amount involved will be set out in the Development DPD and will be reviewed annually. Above normal policy requirements are sought if there is a change from former employment sites. 8.3.3.7 states that where viability is an issue in providing affordable housing, the onus will be on developers to produce a financial assessment showing the maximum amount that could be achieved on the site; on sites where 100% affordable housing is being provided the Council will consider reducing or removing planning obligations if justified through a financial appraisal model or other evidence.

Development Management Plan:

There are a number of policies relevant to residential development. **Policy DMHO1** encourages the retention of existing housing and sets out criteria for redevelopment. **Policy DMHO2** sets out criteria for infill development and **Policy DMHO3** for backland development. **Policy DMHO4** encourages family housing and sets out standards for new housing for external and internal spaces. **Policy DMHO5** covers housing to meet specific community needs. **Policy DMHO6** on delivering affordable housing sets out details on capturing a financial contribution towards off-site affordable housing from sub threshold schemes. Other policies may be relevant if there is a change of use to residential proposed.

Corporate Plan:

The Council will protect the most vulnerable and ensure residents have access to the support and benefits to which they are entitled. One of the identified measures for high quality social care and support services is the supply of affordable and supported housing.

1.4 Supplementary Planning Guidance/Documents, including site briefs

Whilst all adopted SPGs and SPDs will be applied with respect to any development proposal coming forward in the Site Allocations Plan, the following SPGs/SPDs are considered to be most relevant with respect to housing:

- Small and Medium Housing Sites SPD
- Design Quality SPD
- Residential Development Standards SPD
- Draft Affordable Housing SPD
- Richmond Station
- Richmond upon Thames College
- Royal Star & Garter Home
- Stag Brewery
- Teddington Studios
- Latchmere House and HM Remand Centre

Details of all adopted SPGs/SPDs can be found on the [Council's planning policy web pages](#).

2. Research and Evidence

The **Local Housing Assessment (2007)** was conducted by Fordham Research to inform the Core Strategy. It assessed the future requirements for both affordable and market housing. It showed that the need for affordable housing far exceeds the total amount of housing allocated to the Borough in the London Plan. Using the Basic Needs Assessment Model it estimated a shortfall of affordable housing in the Borough of around 2,723 units per annum. It revealed over 11,000 households are in housing need and there were 5,726 households on

the Council's Housing Register. The data suggested that there is a shortfall of all sizes of accommodation with the shortage relative to supply being greatest for four or more bedroom properties. The assessment also needs to be seen within the broader context of:

- a) households that the Housing Register will prioritise for re-housing, those in most need and whom the local authority has a statutory duty to re-house such as homeless households, which mainly require family sized accommodation.
- b) The existing social housing stock which for historic reasons is dominated by bedsit, one and two bedroom properties.
- c) Turnover for social housing is low compared to both owner occupation and the private rented sector, with the lowest turnover in the sector being of family sized accommodation.
- d) Problems of overcrowding with the greatest problems being found in the social housing sector and the number of households waiting for transfers to larger properties.

Further analysis suggested that shared ownership, based on the Borough-wide minimum cost of owner occupation with a 25% discount, is unaffordable for households deemed in housing need and will therefore meet almost none of the net need for affordable housing. For this reason it concluded that the majority of the affordable housing element should be provided in the form of social rented housing in order to be affordable to households in housing need. The main need is for family accommodation for social rent.

The balanced housing markets (BHM) assessment concluded:

- In terms of the demand for affordable housing in the Borough it is clear that this is ongoing. The BHM methodology suggests a significant shortfall of affordable housing of all sizes of accommodation, most notably two and three bedroom homes. The demand for larger units of affordable housing reflects the inability of market housing to cater for lower income larger households and a lack of supply.
- Overall, the data shows only a small shortfall in the owner-occupied sector. In terms of size requirements, the information suggests that in the owner-occupied sector the main shortage is for three or more bedroom homes and there are surpluses of one and two bedroom properties. It is worth noting however, that household projections indicate that there will be an increasing proportion of one person households in Richmond upon Thames in the next fifteen years.
- The model indicates that there is a large surplus in the private rented sector. In this sector all dwelling sizes show a surplus, since many households view this sector as an undesirable long term solution whilst the supply of private rented housing is likely to be large due to the temporary nature of the tenure.

This research informed the Council's Core Strategy, which was adopted in 2009 and Policy CP14 set out the that the Council would exceed its minimum strategic dwelling requirement which involves an additional 2,700 dwellings between 2007 and 2017 (at 270 dwellings per year, in accordance with the then London Plan) and an indicative capacity of 150-330 dwellings per year in the 10 years after March 2017. The Core Strategy set a strategic boroughwide target of 50% affordable housing, with a tenure mix of 40% housing for social rent and 10% intermediate housing. The Inspector's Report on the Core Strategy concluded that in the face of such incontrovertible evidence, the level of provision, threshold and departure from the London Plan on tenure split was considered warranted and necessary.

The Core Strategy set out broad locations for the distribution of housing provision. It generally focuses on reinforcing the role of Richmond, Twickenham, Teddington, Whitton and East Sheen centres, and a pattern of urban villages. Up to 2017 indicative ranges for the amount of housing were set out as:

Area (+ wards)	Residential* (net. inc in units, larger sites plus an allowance for small sites to nearest 100)
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Richmond Ham, Petersham & Richmond Riverside	700-1,100
Twickenham Twickenham Riverside St Margarets & N. Twickenham S. Twickenham W.Twickenham	700-1,100
Teddington + Hampton Hampton North Hampton Fulwell & Hampton Hill Teddington Hampton Wick	700-800
East Sheen East Sheen Mortlake + Barnes Common Barnes	300
Whitton Whitton Heathfield	400

Table 1: Future estimated increases in residential units, retail and employment floorspace to 2017/18, by area*; Source: Core Strategy

* Residential based on Local Housing Availability Assessment, large sites over 10 units gross only, there will be approx 1,700 units on smaller sites, locations not yet known.

Since the Core Strategy, the **London wide Strategic Housing Land Availability Assessment (SHLAA) and Housing Capacity Study 2009** proposed the current lower target for the borough of 245 homes per annum for 2011-2021 which informed the London Plan 2011. The study was based on a detailed large sites assessment. The capacity estimate for small sites was reduced in light of the London Plan's presumption against development on back gardens and based on an extended seven year period of completions to better reflect the ups and downs of the housing market.

The Council's **Borough Investment Plan** recognises the commitment to ensure the more vulnerable people of the borough are protected. It is the framework agreed with the Homes & Communities Agency, which demonstrates needs and highlights opportunities to outline the Council's case for investment and the benefits it can bring to the borough. The gap analysis recognises the importance of delivering houses for social rent in the borough and work within the challenges specific to the borough, and that the borough is keen to explore new methods of delivery.

The **Authority's Monitoring Report (AMR) 2011/12** (indicators 55 and 56) identified a net gain of 208 units completed in 2011/12, and whilst slightly below average there are a significant number of units on a few large sites in the supply pipeline, therefore the Council remains on course to meet the strategic dwelling requirement by 2021. Housing delivery has continued in the borough even during the recent economic downturn and is on track to meet the strategic target set out in the London Plan. The AMR identified a potential 1873 units over the 5 year period, which is 648 units more than the target supply and exceeds the NPPF requirement of an additional buffer of 5%, and provides anticipated trajectory beyond for up to 2023 (see also Appendix 7). With respect to the whole Borough, a five year housing supply was identified for the Core Strategy and in all subsequent AMRs. The 2011/12 AMR has continued to identify future land supply above the required target, including a number of large sites which are expected to come forward for housing, of which a proportion will be affordable.

In future AMRs, the housing land supply strategy will be kept up to date and consideration given to any policy review if necessary - if the relevant buffer required by the NPPF cannot

be identified. The Mayor has already announced his intention to work with boroughs and other stakeholders to develop and implement a new approach that supports his strategic responsibilities and priorities for managing and coordinating sustainable housing growth in London, recognising the importance of housing supply to his economic, social and environmental priorities and taking account of London's status as a single housing market, while also taking a more bottom-up, participative and consensual approach. This work on a London wide SHLAA and SHMA will form the basis for further assessments of housing demand and supply to form the basis for Further Early Alterations to the 2011 London Plan, which are expected to be published in January 2014.

Housing to Meet Specific Community Needs

The Development Management Plan identified current housing priorities including:

- remodelling of older peoples sheltered accommodation to provide self contained units;
- extra care housing which in some cases can be created from remodelling existing sheltered accommodation;
- private sheltered and extra care accommodation (but this would be a lower priority than affordable housing);
- supporting the PLD valuing people agenda to provide greater choice in supporting housing options;
- student accommodation to meet needs of institutions within the borough.

Gypsies & Travellers:

There is an existing Traveller site at Bishops Grove, Hampton, managed by Richmond Housing Partnership, which currently contains 12 pitches, and there is no capacity for expansion.

The Core Strategy was adopted in 2009 and refers to the London wide Gypsy and Traveller Accommodation Assessment (Fordham Research) which identified a need for an additional 2 - 11 pitches in the Borough for the period 2007-2012. However, this was based on an assessment in 2008 and it is not known whether this accurately reflects the needs of the community in the Borough. The Core Strategy pledges to protect the existing site but highlights that the shortage and cost of land mean that there will be limited opportunities for additional Gypsy and Traveller accommodation in the Borough. It sets out that sites will be required to meet the following criteria:

- The site can provide for a satisfactory arrangement of pitches, permanent buildings and open space;
- The use of the site would have no significant adverse effect on the amenity of occupiers of adjoining land;
- The use of the site would be acceptable in terms of the visual amenity and;
- The use could be supported by adequate social infrastructure in the locality.

Various consultations on the draft replacement London Plan during 2009 and 2010 considered different methodologies for setting targets for each borough, proposing targets for Richmond as low as 4 pitches. However, the Mayor took forward the Localism agenda, and the London Plan 2011 does not set borough targets, stating boroughs are best placed to assess the needs of, and make provision for these groups whether through new pitch provision, protection or enhancement of existing pitches, or by other means (paragraph 3.57).

In 2012 DTZ undertook an initial desktop analysis with RHP to estimate the number of people living on the site currently and their household make up. Indeed, this can be hard to pin down at any point in time because some individuals and family units will leave the site for either short or extended periods to travel. The existing Traveller site within Richmond

Borough accommodates two extended families from the Irish Traveller community. RHP estimated that at that time:

- There are currently 8 pitches on site which accommodate families with children (6 of these families appear to be headed by single parents). In total there are approximately 33 people living in these families of which around 21 are children.
- There are 3 pitches accommodating single adults (3 people)
- 1 pitch accommodates two adults (2 people)
- There are 37 people living on site – 16 adults and 21 children.

It is also difficult to establish the ages of individuals living at each pitch without a survey of residents. However, RHP believed that at that time there were at least 8 children between the ages of 2 years and 15 years on the site. The figure could be considerably higher. There were a further 6 young women aged 16-26 on the site. There were fewer young men of the same age. This is relevant because it is the age at which these young people may start to form their own families. In practice, Traveller women living on sites often tend to leave when they marry – joining their husband's site, although individual family needs may vary. On balance, this suggested there should be capacity on the site in future years if the young women leave to form families. But conversely, there is significant potential for the population of the site to expand in future years, leading to overcrowding, if these young people remain on the site and begin to form their own families. There were 3 people on site (living on 2 pitches) aged over 65.

There are also Travellers that might be currently accommodated elsewhere eg in housing or living outside of the Borough but who wish to join the site. There have been very few unauthorised sites or illegal encampments within the Borough in recent years, nor any applications for private sites which would give an indication of additional need/ demand. Research has established that there are sometimes negative psychological effects for Gypsies and Travellers moving into housing. This is caused by the transition from living in a close knit community to a single dwelling which can result in social isolation. This can cause stress and depression amongst Travellers. Some Travellers may need a pitch on a site due to their 'psychological aversion' to housing and this is recognised in case law.

RHP hold a waiting list and as at September 2013 there are approximately 5 -7 on the waiting list, for which applications now have to be renewed annually. All of those on the waiting list are related to someone on the site. There are concerns that some pitches are overcrowded or could become so in the near future, particularly as existing households expand. However, some pitches do become available over time – RHP estimated that one pitch is vacated each year on average through natural turnover.

From the 2011 census, 95 residents identified their ethnicity as White Gypsy or Irish Traveller in the borough. This was the joint lowest with Kingston for Outer London boroughs, although as this category was not recorded in earlier census there is no comparator and this could be an underestimate as some may prefer not to identify themselves.

Through Richmond Housing Partnership, in the summer/autumn of 2013 a questionnaire has been undertaken of the families living on the site in Bishops Grove and in autumn/winter 2013 will be undertaken for those families that could be identified who are currently living in bricks and mortar, to understand their current and future housing and support needs. While the initial indications suggest that additional pitches are not needed in the short term, as needs will be met through the existing site, the questionnaires will be fully analysed and published as a separate piece of research to inform the future position.

Gypsies and Travellers may also be accommodated within the affordable housing stock. It is likely that some families will be willing to move into housing in the future in the same way that others have in the past. Notwithstanding the shortage of affordable housing in the Borough,

the extent to which this can be a solution will depend on the needs of the individual household, how far these can be met by the homes available and wider support that might be required to ensure that these families are not adversely affected by such a move. There may be options for managing any moves into housing to minimise the risk of psychological aversion, including:

- Examining whether 'clusters' of homes can be made available to Travellers relocating into housing from the existing site in order to prevent social isolation and maintain existing social networks.
- Considering the location of homes offered to Gypsies and Travellers eg proximity to the existing site – again in order to prevent social isolation.
- Providing support to Travellers settling in housing in the same way that other vulnerable households are supported into independent living by the Council's supporting people team.

Travelling Showpeople:

While there are a number of fairs, circuses and shows held regularly in the borough's open spaces, there is no indication of any need within the borough for pitches to meet their seasonal working needs.

Supported Housing for people with a learning disability or mental health problem

The Council, in partnership with Richmond Clinical Commissioning Group, is responsible for meeting the health needs of local residents. Supported tenancies in Richmond cover a range of accommodation and adapted properties set up to enable people with a learning disability or mental health problem to live in their own home, regardless of the level of disability. Supported mental health housing is located throughout the borough:

- High support mental health housing in Whitton, Richmond Hill and Barnes
- Medium/high support housing in Teddington
- Low level support housing in Fulwell, Hampton Hill, Hampton, Heathfield, Richmond, Teddington and Twickenham.

As a borough, there is not yet enough supported housing options for mental health and as at April 2013 there were 45 people who require this support placed outside the borough and away from their community. This is not in line with government guidance "No Health without Mental Health", Council policy and the Joint Mental Health Strategy, which recognise the importance, for people with mental health conditions, of being able to live close to home, near the support of their families and friends. Planning permission was granted in July 2013 for conversion to seven self-contained flats at 120-120A Kew Road (13/1026/FUL).

The Council's Learning Disability Commissioning Strategy 2010-2013 set out an aim that more people will live independently in the borough, having their own tenancies and some will have opportunities to own their own home. People with learning disabilities can live successfully in many different kinds of housing and can manage, with support, a full range of tenures, including owning their own homes. However, in March 2009 there were 73 individuals (18% of the total number of service users) placed outside of the borough with a large proportion at a distance of 25 miles or more from the borough boundary (estimated at 65% of the total placed outside of the borough). National research indicates that out of borough placements can have a negative impact on service users and their families due to difficulties people face in staying in contact with family, friends and their local communities as well as difficulties in becoming part of life in the new area and the potential for not enough contact from their placing authority, particularly for those at a distance.

Work is underway to refresh the Commissioning Strategy, although the overall number living outside the borough remains much the same, and there is an accommodation strategy for each client group. The availability of suitable accommodation is key to achieving this, although there are a number of small scale projects in the pipeline. Funding has been

approved for accommodation for some people with complex needs to be provided at Lock Road, Ham (subject to planning).

Private Rented Sector, including students:

The Cambridge Centre for Housing & Planning Research undertook an Analysis of the private rented sector in Richmond upon Thames and surrounding areas in 2012, to inform the Council's Tenancy Strategy. It found the rental market in the borough is clearly strong with properties being let very quickly. It reported the borough does not have a large student market. Student numbers overall have increased since 2001, though their demand for housing has been largely offset by the increasing numbers who remain within their parents' home. The letting agents interviewed confirmed that students were not a major client group in the borough, because students cannot generally afford the high rents. Some lets were reported to wealthy and/or international students.

Extra Care:

The main aim of the Older People's Supported Accommodation Review (2008) was to look at existing means of maintaining independent living for older people and in the light of analysis of local data, trends and best practice to develop options and recommendations regarding services, the changing nature of sheltered housing and the options available for re-aligning supported accommodation and services to better promote independent living. The review highlighted a number of issues including: the importance of housing and support services to allow older people to maintain independent living, the relative popularity of sheltered housing within the borough, the need to re-develop existing sheltered and residential care schemes into extra care housing, the small amount of private sheltered accommodation available in the borough (although this is recognised as a lesser priority than general needs affordable housing) and the need to modernise a small number of sheltered bedsit style accommodation.

There are two schemes in Richmond providing self-contained flats designed to meet the needs of older people. There is an enhanced sheltered accommodation scheme in Twickenham, Sandown Court, which has 25 self contained flats. In 2010 the Dean Road extra-care scheme was launched providing 41 self contained units in Hampton, including shared ownership. There is no provision further east in the borough.

3. Consultation

The Council works with other Boroughs on housing evidence across London, including participating in the preparation of the housing capacity study.

Housing and planning colleagues work closely together, with registered providers and the Homes & Communities Agency - now part of the GLA in London, to maximise affordable housing and there is a commitment to maximise resources for schemes that are of a high quality of design and meet the needs of the most vulnerable.

The planning policy team are a consultee on large applications and those including affordable housing, and discussions with landowners and developers through the pre-application and applications processes are used to inform policy and monitoring.