
Corporate Partnership and Policy Team

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Affordable Housing Management and Standards Division
Department for Communities and Local Government
Floor 3 NWQ
Fry Building
2 Marsham Street
London
SW1P 4DF

Via email: mobility@communities.gsi.gov.uk

Dear Sir/Madam,

**Consultation Response from London Borough of Richmond upon Thames on
'Right to Move'**

This letter is from the London Borough of Richmond upon Thames in response to CLG's 'Right to Move' consultation, the content of which has been agreed by our Cabinet Lead Member for Housing and Public Health, Councillor Lisa Blakemore and also the Leader of the Council, Councillor Lord True.

Richmond upon Thames Council is strongly supportive of measures that support residents to gain employment. The Council took advantage of flexibilities provided in the Localism Act to amend our [Allocations Policy](#). Our new policy incentivises work by giving additional Housing Register priority to households with someone in work for 16 hours or more per week. For those households who for whatever reason cannot work the Council offers additional priority to those households providing a 'community contribution', such as volunteering with a not for profit charitable organisation. We have also demonstrated our support to 'ensure work pays' by prioritising people working in Richmond as part of our [Intermediate Housing Policy Statement](#), ensuring after applications from residents have been considered that shared ownership homes next go to households working in the Borough.

Whilst we would wish to stress the Council's commitment to assisting people into work locally we do not believe that the assumptions outlined in 'Right to Move' around the need of social housing tenants to move for work purposes should reduce the housing opportunities of residents of Richmond upon Thames. This is because the Borough has the fourth smallest social housing sector in Greater London in which to meet housing need. Requiring Boroughs to contribute units for 'Right to Move' will further reduce an already limited supply. The Council has also implemented the freedoms provided by the Localism Act to discharge homelessness into the private rented sector. To date 132

homeless households have been rehoused in the private rented sector (of these 70% were re-housed within the Borough, and the majority of the remainder re-housed within London). It would seem inequitable that a homeless Richmond resident is supported into a tenancy in the private rented sector (which may or may not be in the borough) whilst someone with no connection to Richmond can bypass those on the Housing Register and gain a housing association property.

The issue of needing to move to work may also be different within Greater London. In London the norm is for residents to commute to work, often across London. Given that there are good transport systems in the Capital there is a less persuasive argument that people need to move to access work opportunities. Analysis of travel to work data from the 2011 Census highlights that the major patterns of travel into Richmond to work come from the surrounding boroughs of Hounslow, Kingston, Wandsworth and Ealing. These are served by adequate transport links and there would be little need to move home in order to work here. Looking at the main patterns of travelling to work for Richmond residents demonstrates that large numbers either commute to Westminster, Camden or Tower Hamlets or else work in surrounding Boroughs such as Hounslow, Kingston, Hillingdon and Wandsworth. This data would support the view that people either commute long distances to Central London or work in their own or neighbouring boroughs. These both limit the need to move home for work purposes.

DCLG may also wish to consider the role the private rented sector could play in allowing social housing tenants to move for work or training reasons. National research highlights that new migrant communities successfully access private rented accommodation¹ in order to move for work opportunities. UK residents at the start of their careers routinely use the private rented sector to move for work opportunities. Whilst nationally the poor condition of properties is an issue that needs to be considered, the private rented sector could still provide flexibility in moving to certain areas of the country. DCLG may wish to consider how they could facilitate this further such as rent deposits/guarantees to assist with differentials in private rental costs between regions.

The following comments refer to the key questions outlined in your consultation;

11. Formally incorporating removing the residency criteria for existing local authority or housing association tenants to move for work reasons

Richmond Council would not wish to see this proposal formally incorporated through regulations.

15 & 16. Reasonable Preference – views on utilising existing hardship category or developing new categories for hardship related to work

Richmond Council believes existing 'hardship' criteria are sufficient and there is no need to develop a new reasonable preference category.

21. Setting aside a proportion of lets for tenants needing to move for job related reasons

The guidance does not make clear whether this 1% contribution is in addition to the 5% of re-lets required under the GLA's Pan London Mobility arrangements. It would be useful for this to be clarified.

Our experience to date of the Pan London scheme is that it does not benefit local residents. With good schools, large historic areas of green space, the Thames Riverscape and good transport links there are clear 'pull' factors for housing association tenants to want to remain within Richmond upon Thames. This leaves Richmond a net 'importer', gaining little from the Mayoral scheme.

23. Local Authority requirement to publish information on the demand for and lettings with regard to 'Right to Move'

Richmond Council believes in transparency but this requirement would be onerous for local authorities and goes against the 'red tape' challenge ethos outlined by Ministers.

29. What Housing Associations and Local Authorities are doing to address barriers to movement.

We do however recognise the need for housing association tenants to move for a number of reasons. This is recognised in our local arrangements with Registered Providers, which provides them with 25% of re-lets, which can be used to assist tenants to move. We also recognise the benefits of schemes such as 'Homeswapper' and 'House Exchange' and believe it beneficial for Government to increase focus on participation in these schemes to address mobility issues within social housing.

Should you have any further questions about any of the issues raised here, please contact either Dan Butler, Housing Policy & Research Manager on 020 8831 6017 or dan.butler@richmond.gov.uk, or Nicky Simpson, Planning and Policy Manager (Housing) on 020 8831 6221 or n.simpson@richmond.gov.uk.

Yours sincerely,

Dan Butler

Housing Policy & Research Manager
London Borough of Richmond upon Thames

ⁱ "The Housing Pathways of Polish New Migrants in Sheffield" (2007), Sheffield Hallam University