



Richmond Housing & Homelessness Strategy

2018 – 2023

Decent housing is fundamental in supporting the health and aspirations of residents, the local economy and building vibrant communities.

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Executive Summary

Decent housing is fundamental in supporting the health and aspirations of residents, the local economy and building vibrant communities. London boroughs recognise that addressing the demand for housing in London and the South East is a significant challenge. Furthermore, we recognise that this challenge cannot be met alone, but requires effective collaborative working. The Strategy sets out the Council's housing objectives over the next five years and how these will be met through the Council's own efforts and by supporting our key partners.

It is estimated that the Borough needs between 895-915 new homes per year until 2033 to meet local demand. However, more than two thirds of its land is protected by either open space or conservation area status, resulting in both the highest land values of any outer London borough and limited sites to build on. With the supply of housing not meeting the increasing demand, we must provide effective housing advice and assistance services to help residents access the housing they need. We aim to provide effective services to help those who are homeless or threatened with homelessness. We will ensure those sleeping rough are reached and have a pathway into accommodation. We will also work to maximise housing options for our low to middle income working households.

Building on our strong track record in tackling homelessness, the Strategy sets out the Council's significant investment in homelessness prevention services and our ambitions as we implement the requirements of the Homelessness Reduction Act 2017. The Council will also continue to commission and support SPEAR to operate a rough sleeper service and provide intensive and personalised support to help this vulnerable group find settled accommodation.

The Borough has the highest average house prices and rental costs for family sized accommodation of any outer London borough; therefore, affordability for lower to middle income households is a real concern. The Strategy sets out our commitment to making the best use of our financial assets and resources, as well as working closely with private registered providers, developers, the Greater London Authority and Government to secure maximum levels of grant funding to deliver more affordable homes. These homes will be delivered in developments with a mix of tenures, utilising the Council's own limited land holdings, to supply the maximum number of affordable homes and provide a variety of housing products for people on a range of incomes. This will also include exploring the use of modular build and off-site construction, the benefits of which include speed of delivery, affordability and bespoke design.

More and more people in the Borough are renting privately and the Strategy sets out how we will work with private sector landlords to maintain and where necessary improve standards. In particular, the Strategy sets out how we will tackle rogue landlords using new powers given by the Government to ensure that private renters are given a fair deal.

We are committed to supporting the needs of those vulnerable due to age, disability or mental capacity and will work with our partners to identify need and deliver plans to meet demand.

The problems with the London housing market are well documented and this Strategy sets out our clear vision and set of objectives to address these challenges head on by investing the required time and resources into realising the best possible outcomes for our residents.

Brian Reilly

Director of Housing and Regeneration



Introduction

Why develop a Housing and Homelessness Strategy?

The London Borough of Richmond upon Thames (LBRuT) Housing and Homelessness Strategy sets out the Borough's plans for housing and homelessness services for the period 2018-2023. For the first time, the Housing and Homelessness Strategies have been combined into one plan, in recognition of the interrelated aspects of providing housing options and support for residents including those who are threatened with homelessness.

The Council's previous Housing and Homelessness Strategies covered 2013–2017 and 2012–2016 respectively. As a Borough, we understand the challenges faced by Londoners when it comes to securing a good quality and affordable home to live in. Concern around the supply and affordability of homes for Londoners is growing, with one in three calling it one of the biggest issues faced by the Country¹. The shortfall in housing supply in London and the south east has had impacts on the Council's housing advice and assistance services leading to increased demand for temporary accommodation. National housing policy is now increasingly focused on preventing homelessness by providing assistance earlier. There is also ample evidence that an increasing number of younger households are no longer able to afford to buy putting increased pressure on the social housing and private rented sectors.

The Housing and Homelessness Strategy focuses on four key housing themes in the Borough. These are:

- Delivering affordable homes; new supply and redevelopment of existing social housing stock
- Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023
- Ensuring good quality homes; providing choice, standards and quality for renters
- Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options

¹ Draft London Housing Strategy – September 2017 www.london.gov.uk/sites/default/files/2017_london_draft_housing_strategy.pdf

The Housing and Homelessness Strategy sits under the [Borough's Community](#) and [Corporate Plans](#) and compliments other strategic plans, such as the emerging [Local Plan](#), [Community Safety Plan](#) and [Children and Young People's Plan](#). It builds on existing strategic housing documents including the [Tenancy Strategy](#) 2013 and the [Intermediate Housing Policy Statement](#) 2017. The evidence base for the Strategy includes the Housing and Homelessness Review 2017, the [Strategic Housing Market Assessment](#) (SHMA) 2016 which identifies the scale and mix of housing in the Borough and unmet need and the [Local Plan](#).

Whilst the structure of the Strategy is unlikely to change over the course of its life, national policy changes require a degree of flexibility to respond. As such an annual action plan will be developed (Appendix 1), based around the key themes of the Strategy.

The Council, which does not own or directly manage social housing, works in partnership to address housing issues and the Strategy outlines the work and importance of our key housing partners, including the Greater London Authority (GLA), Private Registered Providers (PRPs) and the local voluntary sector.

The Strategy has been developed in consultation with residents and local partners including through online consultation.

National Context

Since the Council's last Housing Strategy, the Government has made significant legislative changes that have had an impact nationally; the Housing and Homelessness Review 2017 sets this out in detail.

Homelessness Reduction Act 2017 - This new Act amends the Housing Act 1996 to place a greater emphasis on local authorities (LAs) taking preventative measures, such as providing housing options to address homelessness, before it occurs and therefore reducing the need to provide temporary accommodation. The Act aims to strengthen the provisions for households not in priority need.



The Housing White Paper 2017 – [Fixing our Broken Housing Market](#), released in February 2017 set out the Government’s proposals to encourage house building and create 200,000 new home owners by 2020.

Independent Review of Building Regulations and Fire Safety - The investigation into the Grenfell Tower fire will also have ramifications for PRPs, for example, in terms of retrofitting enhanced fire safety measures in their accommodation and the Council will consider carefully all recommendations coming out of this, both in relation to PRPs and any private sector blocks.

Housing and Planning Act 2016 and extension of Right to Buy – The Housing and Planning Act 2016² brings a number of policy changes including the extension of the Right to Buy (RTB) to PRPs, measures to tackle rogue landlords in the private rented sector and regulations to streamline planning policies to increase the delivery of homes.

Houses in Multiple Occupation (HMO) and Residential Property Licensing reforms - During 2015-2016 the Government consulted on a review of HMO licensing, proposing changes to increase the number of properties subject to mandatory licensing by:

- removing the storey rule so all houses (regardless of how many floors) with five or more people from two or more households are included;
- extending mandatory licensing to flats above and below business premises (regardless of the number of storeys); and
- setting a minimum room size of 6.52sqm in line with the existing overcrowding standard (Housing Act 1985)

The Care Act 2014 – The Care Act 2014 extends the role of LAs in providing assistance to people who have care needs. The Act defines housing as a “health-related service”, highlighting the need for integrating care and support provision. To meet these needs the LA must provide a range of housing and support services, through residential care, supported housing and extra care housing.

² www.legislation.gov.uk/ukpga/2016/22/contents

Welfare Reforms – The Welfare Reform Act 2012³ introduced significant changes to the benefits system including new caps on Local Housing Allowance (LHA) and Housing Benefit, the creation of Universal Credit (UC) and the reform of Council Tax Benefit and Disability Living Allowance (DLA). The Welfare Reform and Work Act 2016⁴ contains further changes including the ending of automatic entitlement for 18–21 year olds and the restriction of benefits for families with more than two children.

Localism Act 2011 and Private Rented Sector Offers – The Localism Act 2011⁵ allowed PRPs and LAs more flexibility when managing and allocating accommodation, by providing them with the option to introduce flexible fixed-term tenancies, and giving greater flexibility when allocating social housing and operating waiting lists. It also enabled LAs to cease their homelessness duty through a Private Rental Sector Offer (PRSO) for those who applied after November 2012. Both of these options have been applied within LBRuT.

Future Policies – in September 2017 the Government announced that it will be bringing forward a Housing Green Paper. This will be wide-ranging, covering the overall quality of social homes, their management and the rights of tenants as well as wider issues of place, community, and the local economy.

Regional Context

The Council's Housing Strategy is required to be in general conformity with the London Housing Strategy under the Greater London Authority Act 2007.

The London Housing Strategy – In September 2017 the Mayor released a new draft London Housing Strategy, which is currently under consultation. It sets out five priorities:

- Building Homes for Londoners
- Delivering Genuinely Affordable Homes
- High Quality Homes and Inclusive Neighbourhoods
- A Fairer Deal for Private Renters and Leaseholders
- Tackling Homelessness and helping Rough Sleepers

The proposals include identifying and releasing more land for housing, allocating grants to support new housing targets with 90,000 affordable homes to start on site by 2021, an aspiration that half of new homes in London are affordable and improving conditions in the private rented sector.

Draft Fuel Poverty Action Plan – In August 2017 the Mayor of London released the draft fuel poverty action plan. Proposed actions include:

- Boosting the incomes of people in fuel poverty in London by supporting benefits uptake campaigns, referral services and programmes that provide direct advice and support to the fuel poor
- Increasing the energy efficiency of London's homes so they are better insulated and use less energy
- Tendering for the delivery of an energy supply company, aiming to offer fairer energy bills to Londoners as soon as possible

The London Plan 2015 – The Plan recognised that Greater London has a single Housing Market Area (HMA), whereby 42,000 homes per annum (net) are planned for 2015-25. It set a minimum ten year target of 3,150 homes for the period 2015-25 (315 per annum) for LBRuT. Consultation on a new draft London Plan ended on 2nd March 2018. It proposed a revised target for LBRuT of a minimum of 8,110 homes from 2019-29 (811 per annum), with 50% (4,055) of these being affordable homes (405.5 per annum).

South London Partnership - The Council is a member of the South London Partnership comprised of five London boroughs, Richmond, Kingston, Croydon, Sutton and Merton. The Partnership is focused on the triple goals of: shaping sustainable growth; securing devolution to unlock opportunities; and driving efficiency, working with government, the Mayor of London, other London boroughs and neighbouring LAs outside London, other public sector bodies and institutions, business, and communities to pursue these goals.

Local Context

Corporate Objectives – The [Council's Corporate Plan](#) for 2016-19 outlines three overarching aims for the Council:

³ www.legislation.gov.uk/ukpga/2012/5/pdfs/ukpga_20120005_en.pdf

⁴ www.legislation.gov.uk/ukpga/2016/7/pdfs/ukpga_20160007_en.pdf

⁵ www.communities.gov.uk/documents/localgovernment/pdf/1896534.pdf



- To transform local public services through partnership and collaboration through its community leadership role;
- To build community capacity to enable residents and communities to take greater control over their lives and to shape and where appropriate deliver local services;
- To act primarily as a strategic commissioning body with a reduced role in service delivery.

Community Plan 2016-2020 – The Plan highlights the issue of affordability and shortage of homes in the Borough and recognises that adequate housing is a key factor in maintaining health and wellbeing, requiring partners to work together to ensure that new housing meets the needs of the community. Performance targets aim to maximise the delivery of affordable housing in order to meet a range of housing needs and requirements.

Village Plans - The [Borough's Village Plans](#) and related events are key examples of how the Council, in its listening role, engages with the local community to help shape local service delivery. Affordable housing offers are a component of Village Plans and the Council consults with local residents in relation to their village areas, working where possible to ensure that local housing development is relevant to the area and

welcomed by the community, whilst still ensuring that strategic objectives on housing delivery are met.

Local Plan – The Council's pre-publication [Local Plan](#) sets out how the key issues facing the Borough will be delivered. It outlines how the Council will protect local character by enhancing and maintaining village areas, protecting the Borough's parks and open spaces and ensuring that new developments and public spaces are of high quality design. It also sets out the Spatial Strategy for the Borough, identifying the need for family sized accommodation, particularly within the residential areas, and notes the Borough's centres, such as Richmond and Twickenham, as the areas where it would be appropriate to have higher proportions of smaller units.

Allocations Policy – The Localism Act 2011 enabled LAs to devise allocations policies appropriate to the local area. The [Council's Allocations Policy](#) which came into effect 2017 adopted policies that made the best use of stock available.

The Joint Health and Wellbeing Strategy (2016-21) – The [Joint Health and Wellbeing Strategy](#) (2016-21) includes a prevention framework emphasising the need for joined-up services and for partners to work together to manage health and wellbeing impacts, including housing.



Key Achievements

Key Housing achievements over the course of the last strategy are detailed below.

- As of 31st December 2017 of all of those placed in temporary accommodation 81% were placed in the Borough, 15.5% in neighbouring boroughs and only 3.5% were not in the Borough or neighbouring boroughs.
- The Council has achieved a significant decrease in the number of 16/17 year olds presenting and being accepted as homeless, from 39 in 2010/11 to nine for 2016/17.
- The Council has collaborated with SPEAR and other partners to secure funding to expand both additional accommodation and services that support rough sleepers off the streets. Over 500 homeless people a year are assisted by SPEAR through a combination of outreach services, accommodation offers and additional support. SPEAR's services also include a Homeless Health Link Service and a new specialist hostel for female victims of domestic abuse with complex needs. 17 extremely vulnerable women were assisted and supported during 2017.
- Early intervention work with households affected by welfare reforms has been carried out preventing financial hardship and potential homelessness for 749 households due to be affected by LHA caps.
- The Council developed two joint working protocols to improve collaborative working between organisations providing mental health, housing and homelessness services.
- The Council's housing development service has supported the development of three specialist supported housing schemes providing 11 self-contained and three shared units of accommodation. In addition, within new build general needs housing schemes, where appropriate, clusters of self-contained flats were identified for allocation to people who access the learning disability service to enable supported living. Three flats were identified during 2016-17 and more will be delivered in schemes due to be completed during 2018-19. The Council's Commissioners have also remodelled existing mental health supported accommodation to increase capacity from 84 to 111 units.
- The Council also identifies general needs rented accommodation in its supported queue to provide move on accommodation from supported housing which meets a range of service needs including rough sleepers, mental health, care leavers, learning disability, ex- offenders, approximately 44 homes are accessed each year through this route.
- The completion of 200 affordable homes between 2013/14 and 2016/17 and a further 58 expected in 2017/18 with a pipeline of 131 homes forecast for the next two years.
- Putting in place a new Intermediate Housing Policy Statement that supports the delivery of innovative forms of low cost rent and homeownership housing for working residents on low to middle incomes.
- Since the last strategy, Richmond Housing Partnership (RHP) has freed up 43 homes through work with the South West London Fraud Partnership. For 2017-18 the target of 12 properties recovered due to fraud was achieved by November 2017.
- PA Housing has taken back possession of 20 properties in the Borough through fraud or abandonment.
- RHP has completed over 46 extensions and loft conversions during the last five years to help alleviate overcrowding and to support families with medical needs where a larger home is required.
- The Council has worked successfully with PA Housing to deliver a bespoke specialist housing scheme of four units for young adults with challenging and complex needs who access the learning disability service.
- 411 out of 412 clients, who received support from the Resettlement Service between 2012–2017, maintained their tenancy 12 months later (a 99.8% success rate).
- The Council provided 604 Disabled Facilities Grants (DFGs) between 2012/13–2016/17 helping vulnerable residents to remain in their homes for longer.
- Since 2013 a further 1,699 homes were improved with low level insulation resulting in an average saving of £1,484.57 per household over a ten year period.
- The Council made a successful prosecution against a rogue landlord who was fined £10,000 for providing sub-standard rental accommodation to a local family.



Theme One: Delivering affordable homes; new supply and redevelopment of existing social housing stock

Our objectives are to:

- Work in partnership with PRPs, private developers and the GLA to support the development of new affordable homes
- Deliver a range of affordable homes that meet the needs of local residents and workers
- Maximise and make best use of financial assets and resources, both Council and PRPs, to deliver more affordable housing

Why is this important?

The SHMA 2016 identifies an overall housing need of between 895–915 homes per annum until 2033, with 50% being affordable housing. Whilst it is self evident that not all housing demands and options can be met in the Borough it is recognised that the development of affordable housing should meet a range of needs. This includes providing low cost rent housing to support formerly homeless households to move on from temporary accommodation, supporting low and middle income residents and workers into low cost rent and homeownership options and providing housing options that let more vulnerable residents live independently in their own homes.

Housing opportunities for local residents and workers on low to middle incomes to access the private housing market are limited. LBRuT is the most expensive Outer London borough for house purchase and is the eighth most expensive borough in London. Private renting is also unaffordable for many residents as the Borough has the highest average private rent levels in Outer London, with costs rising by 30% between 2011/12 and 2016/17.

The Borough has around 10,000 social housing units; this represents the fifth lowest social housing stock in London⁶ and as at 1st October 2017 there were 3,670 applicants on the housing register. The high costs of market housing and scarcity of social housing in the Borough highlight the clear need for a range of affordable housing products to accommodate the

needs of households on a range of incomes. There is also a need for the Council and its PRP partners to demonstrate that they are optimising the use of the social housing including maximising the uptake of transfers to create chains of moves.

Housing development in the Borough faces a number of challenges. LBRuT is a unique borough as more than two thirds of it is protected by either Open Land or Conservation designations with development often focused on smaller sites. New development proposals are therefore constrained by planning policies which seek to retain the Borough's distinctive character. In addition, land availability for residential development is further constrained by high existing use values, making it difficult for PRPs to compete with private developers to obtain sites for 100% affordable housing.

The Borough also has to respond to other external factors that influence delivery of affordable housing. One significant factor is the ongoing relaxation of permitted development restrictions to allow conversion of office and retail floor space to residential. Those homes completed under permitted development rights accounted for 69% of the net housing completions in 2014/15, 58% in 2015/16 and 34% in 2016/17. Whilst such conversions may have a detrimental impact on the local economy there is also no requirement for affordable housing to be provided under these arrangements. The Council will continue to explore opportunities with PRPs to secure sites available through these arrangements for 100% affordable housing.

Whilst the Local Plan seeks to protect employment floor space, it is recognised that some of these sites may be redeveloped for mixed use schemes re-providing employment space, provided a sequential approach has been followed and full and proper marketing has taken place. On these former employment sites the Local Plan expects a minimum of 50% affordable housing to be delivered; Housing and Planning Services will therefore work closely to maximise the affordable offer on such sites.

⁶ Homelessness Review and Housing Strategy Evidence Base 2017



What we plan to do

TO WORK IN PARTNERSHIP WITH PRPs, PRIVATE DEVELOPERS AND THE GLA TO SUPPORT THE DEVELOPMENT OF NEW AFFORDABLE HOMES

The Council has supported PRPs developing in the Borough who have been allocated £18m in funding from the GLA for delivery of the 2016-2021 Homes for Londoners Affordable Homes Programme, to deliver 364 affordable homes across six identified sites over the next four years. The Council will meet with the main PRP partners who operate within the Borough in order to develop delivery plans that maximise affordable housing outputs.

Since April 2016, RHP, the Borough's main affordable housing provider, has completed 68 new affordable homes in the Borough, with a further firm pipeline of over 70 homes, and additional new opportunities in preparation. The Council will continue to work in close partnership with RHP on the proposed Ham Close Uplift redevelopment project and it is anticipated that a planning application will be submitted in December 2018 and for works to commence in Summer 2019. The Council is supportive of the programme which aims to deliver better housing and environmental

improvements for the estate's residents. Proposed plans are for the provision of over 400 new homes, improving the green space and contributing to the uplift of the wider area. Current proposals estimate that in addition to the replacement of homes for existing RHP tenants and leaseholders, around 70 additional affordable homes will be delivered together with approximately 150 homes for private market sale.

Alongside the development of new affordable homes, the Council will also take a "whole" stock approach to meeting demand that aligns with the village planning approach. This will include:

- Building to move social renter downsizers to smaller accommodation delivered locally
- Considering forms of innovative intermediate and lower cost market rented housing in certain localities where this suits
- Delivering shared ownership options for local residents and workers to support local economy and infrastructure and moves out of the social rent sector (e.g. through supporting a bespoke low cost home ownership scheme such as the Richmond First scheme).

Such an approach gives those with a strong connection to the Borough, both in terms of support networks or employment, somewhere to live locally.

Improvement and development of the existing social housing stock and related environmental upgrades can be supported by the Council where there is clear resident support. The Council will actively encourage dialogue with local housing providers as to how accommodation and the surrounding area can be improved to benefit residents. This could, for instance, be in the form of improvements to a block of sheltered accommodation where there are shared bathing facilities.

The Council has a Housing Capital Programme, of some £17.7 million over 2017-2023, which supports the development of new affordable housing where additionality can be demonstrated. Over the next year the Council will engage with those PRPs committed to developing in the Borough to agree delivery plans to utilise this funding to maximise, secure and if possible, increase the delivery of affordable housing.

The relaxation of permitted development restrictions to allow office conversions to residential may bring forward schemes that will provide new housing that would be suitable for use as affordable housing. The Council will therefore work with PRPs as it has done with Thames Valley Housing Association (TVHA), on the Queens House development in Twickenham, to assist with acquisition of suitable schemes through the appropriate planning process to ensure that such development opportunities have some local benefit. Likewise, if employment sites are considered for re-development in line with Local Plan policy requirements, the Council will work with developers and PRPs to maximise the delivery of affordable housing on such sites. This could include use of the Housing Capital Programme to support additional affordable homes.

Table 1 shows the current affordable housing delivered by PRPs (completed and programmed) over the lifetime of the Strategy 2017/18–2019/20:

Table 1: Estimated RP affordable housing delivery (in-borough)

Tenure	2017/2018
	2018/2019
Rent	52
39*	41**
Shared Ownership	6
29	22
Total	58
68*	63

*Due to historical boundary changes, total includes 23 units out of borough

**Due to historical boundary changes, total includes 3 units out of borough

At present the number of completions for 2020/21 and beyond cannot be accurately forecast and will be dependent on opportunities emerging from the grant of planning permission including from sites involving use of the Council's assets.

The Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to the strategic borough-wide target set out in the Local Plan and the individual circumstances of the site. The Council will take into account the suitability of the site for different forms of provision and the economies of development to maximise the amount of affordable housing that can be achieved on site.

The Council will also consider providing grant support to PRPs where this will provide demonstrable value for money and additionality which align with the Council's development plans on affordable housing.

TO DELIVER A RANGE OF AFFORDABLE PRODUCTS WHICH MEET THE NEEDS OF LOCAL RESIDENTS AND WORKERS

The Council's planning policies in LP 36⁷ identifies that 50% of all housing units will be affordable housing, with a tenure mix of 40% housing for rent and 10% intermediate housing. Negotiation on a site-by-site basis for affordable housing will take into account affordability, financial viability and deliverability when

⁷ LP 36 is the affordable housing policy cover in the boroughs [Local Plan](#)



seeking to maximise affordable housing and determine tenure, bedroom size and wheelchair accessible units. New housing should be built to higher technical standards for inclusive access, to improve access for all and should give due consideration to amenity space, such as play space for children. Housing for older people should be designed to be capable of adaptation to allow for changing needs over time, including the potential for units to be altered to form general needs affordable housing.

Whilst the Council will have due regard to other planning gain priorities that improve social infrastructure it will seek to maximise affordable housing delivery. The Council will scrutinise the viability of development proposals to ensure that the affordable housing reflects its priorities and best meets the community's needs including seeking to provide housing options for social housing under occupiers to move to smaller accommodation locally freeing up larger family homes for occupation. The Council will also seek amendments to scheme design and layout to maximise the potential for affordable housing delivery on sites and will resist schemes which, through poor design, eliminate the potential for improved affordable housing provision.

The Council will explore and encourage innovative ways of meeting the varied aspirations and accommodation needs of older people as well as other client groups such as people with dementia, mental health problems or learning disabilities. This will include exploring intermediate housing options, such as accommodation for older owner occupiers who may alternatively prefer an affordable shared ownership product that is flexible to allow for a range of shared equity purchase and the potential for the occupier to staircase and occupy at nil rent.

During the consultation process, it was noted that suitable housing options should be made available to older people to enable larger accommodation to be freed up. We are committed to the need for an improved housing offer for older people, so they can feel confident to move to smaller accommodation that best meets their needs and will work with PRP partners to make best use of their assets. Some older people may wish to protect the value of their assets and purchase accommodation outright that better meets their needs. Accommodation for outright sale may be included in a mixed tenure scheme where justified on the basis of local evidential need and/or where required to provide cross subsidy to deliver the Council's priorities. The needs of housing for older and vulnerable people are set out in more detail in Theme

4 - Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options.

The Mayor of London's London Affordable Rent product, (introduced in the [Affordable Homes Programme 2016-21 Funding Guidance](#)) sets rent levels below the Council's Tenancy Strategy. The Council will consider how this product, with its associated higher grant levels of £60K per unit, can be used to maximise the delivery of affordable homes taking into account other rental options that exist that may provide a better alternative (e.g. in relation to the number of homes achieved).

The Council regularly monitors the most up-to-date housing market data, at ward level, to ensure affordability issues are considered in any new affordable housing development. The Council will continue to apply its Tenancy Strategy to ensure that the rent setting for affordable rented homes take account of the wide variation in market rents occurring throughout the Borough. As well as affordable homes for rent there is a need for a range of intermediate housing options, which most commonly assist low to moderate income households (those with an annual income of £20,000- £90,000 p.a.) to access shared ownership options and intermediate rent products.

The Council's Intermediate Housing Policy will prioritise shared ownership sales and intermediate rent options to households who live and/or work in the Borough and seeks to ensure that these homes are affordable to those on lower incomes (currently up to £47,000 subject to periodic review).

The Council also plans to broaden low cost home ownership options by introducing a 'Do It Yourself Shared Ownership' scheme (DIYSO), providing equity loan support to make home ownership more affordable for eligible households, with an aim to launch the scheme Autumn 2018.

New innovative methods of house building are coming to the fore. The development of both modular and offsite construction methods has progressed since the previous Strategy. The potential benefits include speed of delivery, affordability and bespoke design to meet the requirements of London's residents. To address the housing needs of those on lower incomes, particularly single working people (£20,000 to £40,000 p.a.) RHP is developing a prototype under its LaunchPOD initiative, which seeks to provide low cost rented homes for single working households who are largely excluded from the local private rented sector housing market, but not eligible for social housing. Such examples of innovation are broadly welcomed





by the Council where they increase affordable housing options subject to the relevant planning and quality requirements being met.

Increasing the supply of affordable housing for key workers and those on lower incomes came through as a strong theme during the consultation process and it is positive that this theme has strong support. We intend to work in partnership with PRPs to increase affordable housing options, for example the Ham Close development, which will include a number of new homes to rent as well as intermediate low cost housing options.

MAXIMISE AND MAKE BEST USE OF FINANCIAL ASSETS AND RESOURCES, BOTH COUNCIL AND PRPS, TO DELIVER MORE AFFORDABLE HOUSING

Although the GLA has increased levels of grant funding available to support the delivery of affordable homes, locally these grant rates remain challenging for the Borough, given the high land values. The Council and its partners must therefore look to maximise available assets and financial resources to support the delivery of affordable housing in the Borough.

The Mayor of London has proposed a £3.15 billion investment in affordable housing through to 2021. The Council intends to lobby our affordable housing needs to ensure the Borough receives an equitable and fair proportion of the investment taking account of its particular challenges.

The Council will continue to consider supporting affordable housing delivery utilising its Housing Capital Funding subject to due diligence of the requirement for such funding and that the schemes meet the Council's strategic housing objectives. As identified the Council would wish to enter into more formal delivery agreements or plans with its key PRP partners including RHP, which the Council has a long standing and supportive relationship with.

The Council will continue to apply its planning policies to seek financial contributions to affordable housing from all small sites (of fewer than ten units), as an exception to national policy, justified in the context of house prices and affordability issues; the evidence of exceptional local affordable housing need; the constraints in meeting those local needs through on-site provision from larger sites; the subsequent reliance on contributions from small sites, and the importance of these to maximise opportunities to

meet affordable housing delivery targets. The S106 affordable housing financial contributions form an important part in the Housing Capital Programme funding stream.

The Housing Capital Programme has historically been used to support delivery of low cost rented homes or to support improvements to existing social housing stock to address the problem of over-crowding. Support will now be extended to other affordable housing products where this improves the overall affordable housing offer and/or increases the overall number of affordable housing units provided and/or promotes innovative forms of affordable housing.

The Council will keep under review the potential to support a 'Purchase and Repair' programme – acquisition of homes on the open market to provide homes for affordable rent. At present, market conditions mean that this is not financially viable however further consideration will be given to this as part of regular market reviews.

In May 2016, the Council identified sites in its ownership that will be sold, subject to further consideration and negotiations with PRPs, for wholly affordable housing. The Council also agreed the principle use of certain individual properties in its ownership for supported living projects where

potential savings exceed the estimated reduction of capital receipt. This programme is a valuable source of new development opportunities given the limited opportunity to deliver affordable housing on privately owned sites. The agreed schedule of disposals will be subject to periodic review but the Council remains committed to bringing forward disposal options which will maximise the use of its sites to deliver affordable homes.

It is estimated that 80 new affordable units, subject to planning permission, can be delivered through the disposal of Council's assets to PRPs over the 2017-2021 period and the Council will look to increase these opportunities subject to financial due diligence.

The Council will also use its assets flexibly where this will bring demonstrable benefits in delivery. Where appropriate the Council will apply a 'co-joined approach' where it is disposing of more than one site at the same time. This could allow maximisation of the receipt from a high value site which can then be used to cross-subsidise the provision of 100% affordable housing on a lower value site. This approach has financial and procurement advantages, and enables on-site delivery of additional affordable units. Alternatively, the Council may pursue land swap arrangements, where they are identified, with our partner PRPs where this will be of mutual benefit.





Theme Two:

Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023

The Homelessness Act 2002 introduced the requirement for LAs to formulate and publish a Homelessness Strategy every five years based on the results of a Homelessness Review. The Homelessness Review 2017 was developed in consultation with statutory and voluntary sector partners and provides a comprehensive assessment of the nature and extent of homelessness in the Borough, the resources currently available to address it and any gaps in provision.

This chapter sets out how the Council will work to prevent and relieve homelessness and to provide support to people who are homeless, or at risk of becoming homeless, during the coming five years.

Homelessness in the London Borough of Richmond upon Thames

Overall the number of homelessness decisions has fallen over the past five years. This reached its peak in 2012/13 when 582 decisions were made, compared to 319 in 2016/17. The number of homeless acceptances has followed a similar trend, rising to 357 in 2012/13 before falling year-on-year between 2012/13 and 2016/17 down to 192. When compared with the sub-region, the Borough has the second lowest number of homelessness acceptances at 2.26 per 1,000 households, considerably lower than the London average of 5.03.

Comparatively low levels of homelessness may be a reflection of the affluent nature of the Borough and the focus that the Council has had in preventing homelessness and finding alternative accommodation options for households facing homelessness.

However, high property prices and rents mean that, for many people facing homelessness, independently finding a solution to their housing problem is difficult. As at 1st October 2017 there were 3,670 households on

the housing register and the challenges facing housing and homelessness services in the Borough cannot be underestimated.

The most common reason for homelessness acceptances in 2016/17 was termination of an assured shorthold tenancy (35% of cases accepted by the Council as unintentionally homeless and in priority need). This is closely aligned with the trend for both the rest of London and the sub-region where it accounts for 42% of accepted cases. The proportion of household's citing this reason has increased year-on-year since the Homelessness Review 2012, highlighting the increasing difficulties in maintaining access to the private rented sector in the Borough and throughout London.

Most accepted homeless applicants are aged between 25 and 44, with the highest proportion being lone female parents. Over two-thirds of homelessness acceptances in the Borough were deemed to be in priority need because the household included at least one dependent child during 2016/17. Priority need because of vulnerability due to physical disability/ill health was the second most common category in 2016/17, accounting for 12% of accepted cases. This may not provide a true picture of additional vulnerabilities however; dependant children may be recorded as the reason for priority need in situations where there are other contributing factors.

Such factors as children and the often significant vulnerability of single adults that the Council assists means that joint working with Adult Social Services and Achieving for Children (AfC), alongside health and other related services is crucial in ensuring that a package of support leads to the best possible housing outcomes.



Homelessness Prevention

Our objectives are to:

- Successfully implement the Homelessness Reduction Act 2017 (HRA) from April 2018. To ensure that the new duties are bedded in across Housing Services, developing a 'whole borough partnership' approach to support making the aims of the Act a success locally
- Work with partner agencies to move from reactive to preventative upstream homelessness prevention work
- Establish improved links with landlords in the private rented sector with the aim of working together to prevent homelessness and increase housing options

Why is this important?

The new duties contained in the HRA place additional, ambitious and time intensive duties upon the Council. The Council must consider how best to align existing and new resources including staffing to ensure that there is an effective housing solutions service available to all those who need it before they become homeless. Partnership working with statutory and voluntary sector partners is essential to fulfilling this

and is reinforced by the Act which introduces a new duty on public bodies to refer clients to LAs where they are threatened with homelessness or are homeless.

The HRA includes a strengthened duty on councils to prevent homelessness and take reasonable steps to help a homeless person ensure that accommodation remains available to them. The intention is to support the LA to engage, and wherever possible to intervene at an earlier point, with the aim of preventing homelessness for all households, regardless of any longer term statutory duty that may subsequently be accepted.

During 2016/17 the Council prevented 162 households from becoming homeless. Whilst the number of preventions has reduced, there have been changes in the reasons for homelessness; the HRA will provide added impetus to prevent homelessness including finding alternative accommodation options before homelessness arises. During the same period, the Borough has experienced a 17% increase in households placed into temporary accommodation and in 2016/17 there were 192 households accepted as homeless. Much of this increase is an increasing inability of lower income households to access private rented sector accommodation locally given the very high demand and cost for it.

The changing reasons for homelessness mean that it is becoming increasingly difficult to prevent a household from losing their accommodation. Since 2010/11 termination of an assured shorthold tenancy as the reason for homelessness in the Borough has risen from 21% of all accepted cases to 35%. Prevention in these cases is often not possible as tenants with an assured shorthold tenancy are required to vacate a property providing the landlord has completed the correct legal process to gain possession.

What we plan to do

SUCCESSFULLY IMPLEMENT THE HOMELESSNESS REDUCTION ACT 2017 (HRA) FROM APRIL 2018. TO ENSURE THAT THE NEW DUTIES ARE BEDDED IN ACROSS HOUSING SERVICES, DEVELOPING A 'WHOLE BOROUGH PARTNERSHIP' APPROACH TO SUPPORT MAKING THE AIMS OF THE ACT A SUCCESS LOCALLY

The HRA provides LAs with the legislative framework to develop effective homelessness services which are focused on prevention and relief of homelessness for all affected people. Single people who may not be owed the full rehousing duty will be entitled to enhanced levels of advice and/or assistance to sustain their current accommodation or if this is not possible to secure alternative accommodation. The Council is supportive of this opportunity to shift the focus to effective homelessness prevention, to work with households to remain in their home, reduce the use of temporary accommodation and the costs involved in providing such accommodation and to reinvest savings into the preventative services.

The Council will review all financial resources to consider how best to implement the HRA and ensure it can meet new statutory duties including those available to the Council's housing benefit services. This may include merging several distinct budgets, including the Rent Deposit Scheme and Local Assistance Scheme, to produce a general homelessness budget which can be more effectively targeted to meet need as new duties are integrated into the service. Discretionary Housing Payment arrangements will also need to be reviewed to consider how such funding can support preventative

activities and enable households to take up alternative housing options.

The Government has estimated that the HRA presents an overall increase in workload for LAs of 27%, including a 50% increase in the number of homelessness related reviews requested. It is thought that in very high demand areas, such as London, the increase will be greater. The Council will therefore increase the current workforce across the Shared Staffing Arrangement (SSA)⁸ by 25–30 full time equivalent staff members with an enhanced focus on advice and assistance around prevention. This will be partly funded by the New Burdens award allocated to the Council, partly by the Flexible Homelessness Support Grant and, as necessary, by the Council's General Fund.

The Council will ensure that all relevant staff receive adequate training on the new duties and that all appreciate the difference in focus brought about by the Act. Staff will attend refresher courses as necessary and new staff will be recruited with a particular focus on enhancing the skills and experience of homelessness services to better meet the preventative agenda.

WORK WITH PARTNER AGENCIES TO MOVE FROM REACTIVE TO PREVENTATIVE UPSTREAM HOMELESSNESS PREVENTION WORK

Strong links with local agencies that provide homelessness related services have been forged through the Homelessness Forum and other multi-agency groups. The Council will continue to work with local partners to further strengthen these links and to ensure that upstream prevention work is possible through agencies working together early to identify households at risk of homelessness. This will involve establishing indicators of risk and key transition points, for example leaving institutional care or benefits being sanctioned, and working with the community to promote understanding of these potential homelessness triggers. New referral protocols will be established in order to facilitate public bodies meeting their new requirements as efficiently and consistently as possible. For those who are homeless or threatened with homelessness and also eligible for

⁸ Since 1st October 2016 a SSA has been in place between LBRuT and Wandsworth Borough Council and the Housing Options service operates across both boroughs.

assistance, the LA will work with applicants to agree a personalised plan, which will set out the steps that should be taken to ensure accommodation is secured and/or retained. This will include working with relevant partners. Such plans will be kept under review until the LA has determined no other duty is owed under part VII of the 1996 Act. Such an approach will address comments from those voluntary sector services providing assistance to single homeless who wished see the Council be more pro-active in its response to the local residents they seek to help.

Internal colleagues, including the benefits service, adult social services and AfC, are often best placed to identify a potential housing crisis and the Housing and Regeneration Department will work with them to ensure effective and proportionate information sharing to benefit that household. A joint working protocol between Housing and AfC is currently being established and will reflect any necessary changes to collaborative working and information sharing. Benefits data may be used as part of a predictive modelling framework to identify households at risk of rent arrears in the future.

Lessons will be learnt from other LAs who have undertaken homelessness prevention trailblazer projects, and the Council will work with colleagues across local government to promote the sharing of best practice.

Mediation will become a stronger focus of the Housing Solutions Service. The Council will ensure that staff are adequately skilled to provide mediation where relevant to prevent parental evictions and those from the private rented sector, the two biggest causes of homelessness in the Borough.

Whilst the Housing Solutions Service may not directly procure services, at this point, the Service will seek to ensure that grant funding and support arrangements provided by the Council recognise the responsibilities of voluntary sector bodies to advise and where appropriate refer. The Council will look to re-affirm existing working arrangements with PRPs operating in the Borough to ensure that households threatened with homelessness are identified so assistance can be provided (either directly by the Housing Solution Service or through referral to another agency).

ESTABLISH IMPROVED LINKS WITH LANDLORDS IN THE PRIVATE RENTED SECTOR WITH THE AIM OF WORKING TOGETHER TO PREVENT HOMELESSNESS AND INCREASE HOUSING OPTIONS

Homelessness from the private rented sector remains a significant cause for concern in the Borough and across London. Welfare reforms including the LHA caps and freeze, the benefit cap and UC have led to many private landlords withdrawing from letting their accommodation to households on lower incomes where housing benefit might be claimed. In June 2018, the Borough will become a UC full service. This may provide further challenges particularly from households living in the PRP sector who have previously had their rent paid directly to their landlord or households where payments have not previously been unduly delayed.

The Council will provide a new offer to landlords (as detailed in the forthcoming Cabinet report in March 2018), which provides enhanced incentives to working with the Council to rehouse residents or prevent eviction in the first place. Experience has shown that landlords are not necessarily incentivised by financial awards alone, with many citing other services, such as vetting of tenants and an ongoing tenancy sustainment service as being more important to encouraging them to let to households reliant on benefits. The package will include an enhanced advice service to local landlords including a new hotline.

Maintaining strong links with local landlords will ensure that they are kept abreast of legislative and policy changes which affect their tenants and how they might work with the Council to mitigate the potential effects of these. The Council will build on existing links with major landlord organisations such as the National Landlords Association and Residential Landlords Association, attending their forums to build relationships with landlords and discuss relevant issues. Making a better offer to private landlords to house those on welfare benefits and provide longer term housing solutions was expressed as a need during the consultation process and it is hoped our actions to improve links with private landlords, as well as more incentives, will support longer term housing options for our residents, including those in receipt of welfare benefits.

The Housing Solutions Service is also planning to work closely with the Council's Private Sector Housing Service to maintain and improve standards and to identify opportunities to attract landlords to let to Council nominees with new enhanced offers the Council will make.

Providing Appropriate Accommodation

Our objectives are to:

- Provide enhanced housing solutions for homeless households and those at risk of homelessness
- Improve the Council's supply of temporary accommodation, reduce expenditure in this area and reinvest in preventative services
- Provide suitable temporary accommodation that meets the needs of households and vulnerable groups, including rough sleepers

Why is this important?

The scarcity of temporary accommodation and social housing mean that alternative housing options such as facilitating a move into the private rented sector is one that must be explored. However, the increased

demand and limited supply of private rented housing available to the Council and its nominees and the legal challenges brought regarding the use of the PRSOs to discharge the housing duty means the Council's use of this has declined from 68 discharges into the private rented sector in 2013/14 to six in 2016/17.

During 2016/17 259 households were placed into temporary accommodation. Most spend between one and two years here before moving on to settled accommodation. The Council has been successful in maintaining the majority of placements within the Borough with the remaining 36% of placements in neighbouring boroughs. This has the effect of preserving households' existing social, education and employment links and support networks. However, this has also led to high costs associated with temporary accommodation.

Temporary accommodation costs continue to rise. During 2015/16 spend on this accounted for 39% of all homelessness spend, compared to 24% in 2009/10. This has overtaken spend on homelessness administration, advice and support which accounted for 12% of homelessness spend in 2015/16 compared to 22% in 2009/10.





What we plan to do

PROVIDE ENHANCED HOUSING SOLUTIONS FOR HOMELESS HOUSEHOLDS AND THOSE AT RISK OF HOMELESSNESS

We know that homelessness prevention has become more difficult and that, despite additional resources and a stronger focus, prevention will not always be possible. The Council will work to create enhanced housing solutions through sub-regional and wider mobility opportunities for those at risk of homelessness or already in temporary accommodation. This will be the principle focus of a new role, the Allocations and Mobility Officer.

As part of efforts to maintain access to the private rented sector, the Council will continue to operate the Rent Deposit Scheme which facilitated 413 moves into private rented accommodation between 2012/13 and 2016/17. The scheme will be refreshed as part of the new landlord offer to improve access opportunities into suitable private rented accommodation.

IMPROVE THE COUNCIL'S SUPPLY OF TEMPORARY ACCOMMODATION, REDUCE EXPENDITURE IN THIS AREA AND REINVEST IN PREVENTATIVE SERVICES

The Council will look to new ways to reduce expenditure on temporary accommodation by increasing the supply of self-contained accommodation through leasing, thus reducing its reliance on nightly paid accommodation. A greater focus on securing appropriate private sector leased accommodation will be possible through the expansion of the Temporary Accommodation team.

The Council expects that levels of temporary accommodation use will reduce as a result of the focus on prevention and relief brought about by the HRA. In terms of forecasting, the Council is aiming to maintain temporary accommodation use to 150–250 placements every year over the period of the Strategy. The Corporate Plan sets a definitive target annually for temporary accommodation placements which is reported quarterly.

PROVIDE SUITABLE ACCOMMODATION THAT MEETS THE NEEDS OF HOUSEHOLDS LIVING IN TEMPORARY ACCOMMODATION AND VULNERABLE GROUPS, INCLUDING ROUGH SLEEPERS

During the consultation process, it was expressed that there should be an increase in homeless shelters in the Borough for rough sleepers. The Strategy reflects the current provision of maintaining the two existing refuges as well as a commitment to work with partners, such as SPEAR, to sustain and grow rough sleeper provisions in the area through supporting funding opportunities as they arise.

The Council will explore the expansion of its portfolio of freehold homeless persons hostel accommodation. The Council currently operates two hostels in the Borough providing a total of 50 bed spaces. Each hostel caters for both single and family households. Consideration will be given to whether this provision is sufficient or whether further procurement of such accommodation is necessary including where areas or buildings can be utilised temporarily to provide accommodation through longer term leasing or purchase. It is recognised that the Council does not operate in isolation when seeking additional, improved or different types of temporary accommodation but rather works within a marketplace shaped by wider economic factors and by activity undertaken by other London boroughs in respect of procurement.

During the period of the previous strategy, the Council maintained the use of temporary accommodation at a relatively stable level, in contrast to the majority of other London boroughs. Whilst the proportion of households placed within the Borough remains high, sourcing in-borough accommodation has become more problematical as the total number of placements by London boroughs collectively has increased. As such, a Temporary Accommodation Procurement and Placement Guideline have been adopted as part of this strategy for use, if accommodation cannot be sourced within the Borough. These guidelines are attached as Appendix 2 to this strategy.

Further, the Council will continue to commission Refuge to operate two refuges in the Borough. These are seven and eight bed units offering person-

centred support and stays of up to two years. Floating support services are also provided to an additional 14 units, with support in place for up to one year. For female rough sleepers who have been victims of domestic abuse the Council, Refuge and SPEAR will work jointly to provide a specialist refuge for women with particularly complex needs for whom traditional refuge accommodation would not be suitable. This is funded until April 2018 and the Council is committed to working with its partners to seek further funding to retain this provision.

The Council will continue to ensure appropriate accommodation for other vulnerable groups, including care leavers, ex-offenders and people with mental health problems is available (as set out in more detail in Theme four - Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options).

Supporting Vulnerable Groups, including Rough Sleepers

Our objectives are to:

- Enhance support services for homeless people and those at risk of homelessness
- Maintain and where possible enhance rough sleeper services to reduce rough sleeping through the ongoing provision of effective outreach services
- Ensure vulnerable groups have access to support to maintain their tenancy
- Keep under review protocols relating to youth homelessness

Why is this important?

A whole systems approach is necessary to address homelessness, particularly for vulnerable people for whom additional needs often require collaborative work across various services. Homelessness is not only a housing issue but is often as a result of relationship breakdown, domestic violence and abuse, poor mental health, substance misuse and worklessness etc. The Council recognises that a robust service can only be achieved through effective collaboration with a range of partners.

There were 105 new rough sleepers verified during 2016/17 a reduction from 133 during 2015/16. Particular aspects of the Borough, such as the large amount of green space, comparatively low crime and supportive residents, contribute to these numbers. This highlights the importance of maintaining local services targeted towards preventing and alleviating rough sleeping in the Borough and the continuing need to evaluate and enhance provision; this is a longstanding priority for the Council.

The Council commissions SPEAR to operate rough sleeper services. A recent review of their clients highlighted the complex nature of rough sleepers' needs. 95% of people living in SPEAR supported accommodation have a mental health problem, 60% have an alcohol or substance misuse problem and 30% have a significant physical health issue. A history of offending and having been either the victim or perpetrator of domestic abuse was also the case for 40% and 23% respectively. As a snapshot, between April – October 2017 68% of rough sleeper clients had a local connection with the Borough.

Complex and multiple needs mean that rough sleepers and other vulnerable groups require intensive and personalised support to achieve settled accommodation and that factors contributing to their homelessness must be addressed so where possible repeat homelessness is avoided. The Homelessness Review 2012 indicated a higher than average level of youth homelessness in the Borough. The Council worked with relevant partners to reduce this significantly from 39 cases in 2010/11 to nine in 2016/17. A joint working protocol between housing and AfC was developed to ensure ongoing effective collaborative work for homeless 16 and 17 year olds.

What we plan to do

ENHANCE SUPPORT SERVICES FOR HOMELESS PEOPLE AND THOSE AT RISK OF HOMELESSNESS

The Council will continue to improve links with statutory and voluntary agencies working in the Borough to ensure that the complex needs of vulnerable homeless people are met. This will include drawing on established collaborative working

relationships that have been developed, including the Homelessness Forum, and ensuring that such groups meet regularly to address issues in relation to tackling homelessness and rough sleeping.

The mental health of rough sleepers has emerged as a particular concern and the Council will ensure that effective protocols are in place to ensure a joined-up response. The Richmond Health and Wellbeing Board is committed to an Outcomes Based Commissioning approach which extends to mental health community services and the Department will support this as appropriate. The Council will review as necessary the Homelessness Prevention and Hospital Discharge (Mental Health) Protocol and the Mental Health and Housing Joint Working Protocol.

The Council will build on the existing coordinated approach to grant bidding, working collaboratively with Council colleagues and external partners to identify funding opportunities, secure additional resources and promote innovation in homelessness services.

MAINTAIN AND WHERE POSSIBLE ENHANCE ROUGH SLEEPER SERVICES TO REDUCE ROUGH SLEEPING THROUGH THE ONGOING PROVISION OF EFFECTIVE OUTREACH SERVICES

The Council has a long-term commitment to the provision of comprehensive rough sleeper services through the pathway model operated by SPEAR, with the ultimate aim of settled accommodation. SPEAR also operates the Homeless Health Service which addresses the health needs of rough sleepers, and specialist accommodation for victims of domestic abuse with complex needs. The Council will also work with its Clinical Commissioning Group colleagues and SPEAR to support the development of health services that meet the standards set out for Commissioners by the London Healthy Partnership for homeless people.

The Council will continue to provide these services through its commissioning contract with SPEAR given their local presence, commitment to working in the Borough and proven track record. A robust reporting and monitoring system is in place that will ensure the continued delivery of a high quality service. As well

as maintaining current move-on provision for rough sleepers, the Council will explore opportunities for expansion both in and outside the Borough.

The Council will continue to work with SPEAR to bid for additional resources; this will include assisting with sourcing grant funding for the Homeless Health Link service and specialist accommodation for victims of domestic abuse in order that both can continue beyond April 2018.

The Rough Sleepers Initiative Group was set up during 2016/17 to coordinate a joined-up approach to addressing concerns around entrenched rough sleepers in the Borough. Partners include Community Safety, SPEAR, Housing Services, the Police, Adult Social Services and voluntary agencies. The Council will continue to facilitate the group and ensure that it is achieving sustained outcomes around supporting hard-to-reach rough sleepers off the street. The Council will also step-up focus on problematic rough sleeping, including that associated with street drinking and anti-social behaviour through coordinated action agreed by the group. An ongoing aim is to raise awareness of the support services available that provide assistance to move people away from living or being on the streets.

ENSURE VULNERABLE GROUPS HAVE ACCESS TO SUPPORT TO MAINTAIN THEIR TENANCY

The Council's Resettlement Team provides targeted support to prevent homelessness from temporary and settled accommodation. The service has assisted 1,204 people since 2012 through a combination of drop-in advice sessions and individual intensive support. This includes assisting people to complete benefit claims, set up utilities, prepare budgeting plans and access additional services as required. The Council will review the team's scope and consider how best to strengthen the service in light of new duties brought about by the HRA, including the potential to provide support across both social and private sector rented housing.

Citizens Advice Richmond (CA(R)) provided multi-disciplinary services, including welfare, debt, rent arrears and employment to 5,450 residents in 2016/17. The Council will continue to commission CA(R) to provide advice in these areas. The Council will review



the contract and targets in light of the new duties brought about by the HRA which will require a stronger focus on services for all homeless people, including personalised plans which the CA(R) may be well-placed to feed into.

KEEP UNDER REVIEW PROTOCOLS RELATING TO YOUTH HOMELESSNESS

The importance of an effective collaborative approach to addressing homelessness amongst 16/17 year olds was highlighted in the previous Homelessness Review which found higher than average levels of youth homelessness in the Borough.

The Department worked with relevant partners in AfC to address this and has been successful in maintaining low levels of youth homelessness since. The protocol covering 16/17 year olds was reviewed during 2017/18; this will be kept under review, with Housing and AfC currently working on a Joint Working Protocol covering safeguarding overall. Joint working arrangements between AfC and their partners was recently highlighted as being particularly effective in the 2017 OFSTED inspection report.



Theme Three: Ensuring good quality homes; providing choice, standards and quality for renters

Our objectives are to:

- Improve conditions in the private rented sector
- Implement changes to Houses in Multiple Occupation (HMO) licensing
- Implement the regulations arising from the Housing and Planning Act and publicise the new requirements to landlords
- Continue to prioritise fire safety and take any necessary actions arising from the Independent Review of Building Regulations and Fire Safety
- Support the regeneration of Ham Close Uplift programme
- Secure the efficient use of existing social housing stock and maximise opportunities for social housing tenants to move, downsize and to address overcrowding
- Ensure the Housing needs of Gypsy and Travellers are assessed
- Improve housing management standards for residents in PRP accommodation through the work of the Tenants' Champion providing a complaints resolution service and supporting better multi agency working on complex cases

Why is this important?

34.6% of households in the Borough rent their homes, 22% from a private landlord and 12.6% from a PRP. Whilst much of the private rented sector is of good quality, in those instances where basic standards are not met, it is vital that the Council takes action⁹ to improve conditions. In 2016/17 the Council's Environmental Health Officers (Private Housing) intervened in 275 privately rented properties, following complaints about disrepair or poor conditions from tenants, with 180 requiring a formal inspection and hazard assessment, under the Housing, Health and Safety Rating System (HHSRS).

In addition, the Council currently has 40 licensed Houses in Multiple Occupation (HMO), which are traditionally more at risk of being in poor condition and having poor management. HMOs are properties lived in

by more than one household who share bathroom and kitchen facilities. Licenses are currently required where properties are of three storeys or more, are occupied by five or more individuals and have shared facilities, although as set out earlier new regulations on HMO licensing will be coming into effect in April 2018.

The Energy Efficiency (Private Rented Sector) (England and Wales) Regulations 2015 will come into force for new lets and renewals of tenancies with effect from 1st April 2018 and for all existing tenancies on 1st April 2020. The Regulations will make it unlawful to let residential properties with an Energy Performance Certificate (EPC) rating of 'F' or 'G' (i.e. the lowest 2 grades of energy efficiency) and it will be unlawful to rent a property which breaches this requirement, unless there is an applicable exemption.

The Housing and Planning Act 2016 has introduced a range of measures to improve the standards for renters. This includes extensions of rent repayment orders, the rogue landlord/letting agents database, banning orders and civil financial penalties. Private landlords will also be able to recover possession of an abandoned property more quickly, without the need for a court order, as long as the required notices are served correctly. The Mayor of London has also proposed a rogue landlord/letting agents 'watchlist' (a database developed with all London boroughs to protect London's two million renters), allowing the public access to check if a landlord has been prosecuted for a housing related offence.

Following the Grenfell Tower fire in June 2017, the Borough has placed a priority on ensuring the necessary fire safety checks to housing stock across the Borough, both private and PRP housing and, in particular, those buildings with cladding are undertaken. The Council will await the report on the Independent Review of Building Regulations and Fire Safety due to be published in 2018 and action any matters arising from this. However, it is notable that RHP and other social landlords in the Borough are already proactive in identifying necessary works to improve fire safety in their properties.

⁹ The Council will do this using the powers set out in the Housing Act 2004 and the Housing, Health and Safety Rating System (HHSRS)



There are 1,157 households with overcrowding points on Richmond's housing queues. Due to the limited availability of affordable housing options, it's important that PRPs in the Borough utilise their existing stock effectively, ensuring downsizing schemes are in place, tenancy fraud is detected and properties are brought back into proper use to meet the priorities identified by the Council.

The Draft London Plan states boroughs should actively plan for Gypsies and Travellers' accommodation needs, and should ensure that where new sites are required and can be located they are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.

The Council supports social housing tenants and leaseholders of PRPs in the Borough by offering a Tenants' Champion Service, performed by a local Councillor, for complaints resolution. The service aims to improve housing management standards for these residents. The Tenants' Champion led Inter-Agency Forum provides an important platform that brings together partners from PRPs, the Council's Housing, Residential and Social Care Services, Mental Health Services, AfC, the Police and the Voluntary Sector to maintain good joint working between partners.

This is particularly important at a time when many of these services have been re-structured and ensures resources are co-ordinated and outcomes are improved for tenants and leaseholders in need of help.

What we plan to do

IMPROVE CONDITIONS IN THE PRIVATE RENTED SECTOR

The Council will improve conditions in the private rented sector through both informal intervention with landlords and the use of formal enforcement powers.

Whilst much of the work in the private rented sector is demand led the Private Sector Housing Team has identified the following targets:

- Improve 60 premises per year through informal intervention
- Remove hazards in 75 premises per year
- Serve 75 preliminary and statutory enforcement notices per year
- Continually publicise the work of the team and the assistance available to tackle poor conditions and landlord practices.

The Private Sector Housing Team will utilise the powers under The Energy Efficiency Regulations either through new requests for HMO licenses or where a tenant in the private rented sector makes a complaint about excessive energy bills or excessive cold. The team will ensure that the EPC demonstrates the energy efficiency of the property and that this is sufficient to meet the new regulations. If the landlord fails to improve the energy efficiency rating then the Council will use the financial penalties available (a civil penalty of up to £4,000 can be imposed).

IMPLEMENT CHANGES TO HOUSES IN MULTIPLE OCCUPATION (HMO) LICENSING

The changes in HMO licensing are due to come into effect in April 2018 and will further enable LAs to tackle poor standards, migration and the problems being seen in high risk smaller properties as the sector has grown. The Council has lobbied for licensing for all HMOs with five or more people from two or more households regardless of the 'storey rule', to ensure these issues are addressed. In addition, the Council has expressed the view that licensing schemes be extended to flats above or below business premises. The Council's Private Sector Housing Team will work collaboratively across London boroughs to ensure HMOs are consistently well managed given that many landlords operate across borough boundaries and aim to inspect 15 HMOs per year for licensing purposes.

IMPLEMENT THE REGULATIONS ARISING FROM THE HOUSING AND PLANNING ACT AND PUBLICISE THE NEW REQUIREMENTS TO LANDLORDS

The Council will implement the regulations arising from the Housing and Planning Act 2016 and envisage the use of financial penalties, to help improve the standards for renters and take the necessary enforcement action against rogue landlords. In respect of any landlord who is convicted of a housing related offence, the Council will make applications to the relevant tribunals for the landlord to be entered onto the national rogue landlord database and to receive a Banning Order, which will prohibit them from being involved in letting or property management activity for a minimum of 12 months. The Council will make use of data held in tenancy deposit schemes to assist in

investigating offences under Housing Act legislation. These enforcement powers will be communicated to private landlords through landlords' membership organisations, targeted mailing and more generally through the Council's website. The Council will also notify the Mayor of London where a private landlord is convicted of a housing related offence or receives a financial penalty and will publicise the Mayoral database where necessary, raising awareness amongst residents. Feedback from the consultation process included the need for stronger penalties against rogue landlords. We will implement the actions arising from the Housing and Planning Act 2016, which comes into effect in April 2018.

CONTINUE TO PRIORITISE FIRE SAFETY AND TAKE ANY NECESSARY ACTIONS ARISING FROM THE INDEPENDENT REVIEW OF BUILDING REGULATIONS AND FIRE SAFETY

Following the tragic events at Grenfell Tower, RHP will be installing sprinklers in its two tallest blocks at Hounslow Heath (both 15 storeys) starting in 2018-19. In addition to this there is an existing phased programme starting in 2018-19 to install sprinklers in some retirement schemes with priority being given to an extra care scheme at Dean Road. RHP will continue the delivery of the risk based programme to install hard wired smoke alarms in tenants' homes. They will also continue the most intrusive type 4 fire risk assessments where there is limited information about compartmentation in flatted blocks. All high rise blocks have already been risk assessed with a plan in place for associated remedial actions with RHP's residents able to view their fire risk assessments on line. Over the last four years RHP have delivered a significant programme of investment to improve fire safety, for example, installing fire safe front doors, fire panels and heat detectors.

The Council will continue to work with the private sector and London Fire Brigade as appropriate to assess fire safety in accordance with Housing Fire Safety (LACoRS 2008)¹⁰ guidelines and if remedial action is required, this will be enforced using Housing Act 2004 enforcement powers and HHSRS.

¹⁰ LACORS is the body which co-ordinates local authority regulators with the approval of Communities and Local Government, as well as the Association of Chief Fire Officers.

SUPPORT THE REGENERATION OF HAM CLOSE UPLIFT PROGRAMME

As set out in Theme 1 - Delivering affordable homes; new supply and redevelopment of existing social housing stock, the Council will continue to work in close partnership with RHP on the proposal for a Ham Uplift redevelopment project. It is anticipated that a planning application be submitted in December 2018 with works commencing in Summer 2019. The Council supports the aims of the Uplift programme, which are to improve standards, green spaces, estate design and the environment for those living on the estate and uplift of the wider area. The Council will continue to be an active participant in working groups to ensure that the opportunity to improve housing, the environment and Council owned community facilities is maximised and that the regeneration scheme is delivered with the support of local residents.

SECURE THE EFFICIENT USE OF EXISTING SOCIAL HOUSING STOCK AND MAXIMISE OPPORTUNITIES FOR SOCIAL HOUSING TENANTS TO MOVE, DOWNSIZE AND TO ADDRESS OVERCROWDING

Following the success of earlier extension programmes, RHP has committed to completing another five extensions during 2017/18. The Council, in October 2016, approved £250,000 additional grant funding from the Housing Capital Programme to support this work, allocating up to £40,000 grant for a one bedroom extension and £50,000 for a two bedroom extension. Subject to future funding support from the Council and suitable properties being identified, RHP plan to work with the Council to continue to deliver an extensions programme. PRPs, such as RHP, also operate a choice based lettings scheme, whereby discretionary allocations are granted to move households who are overcrowded into larger accommodation and through the promotion and administering of mutual exchange moves, where social housing tenants can swap to a more suitably sized home.

The Council also runs a Sponsored Moves scheme which can benefit social housing tenants who wish to voluntarily move to a smaller property where they are under-occupying their current home. Tenants can

receive a payment of £2,500 for each bedroom they give up by moving to a smaller property and have their removal costs paid for. The scheme has a six year capital funding programme in place of £1.6m to support households who wish to move on a voluntary basis to smaller accommodation. Details of the scheme are advertised on the Councils website. The Council will continue to encourage PRPs to promote this scheme and support the development of new build social housing which will provide opportunities for downsizers to move and stay within their local area. The Council through its Development Team will support such initiatives where there is evidence that local neighbourhood/village initiatives are necessary to facilitate downsizing moves.

In order to ensure the most efficient use of existing stock PRPs in the Borough will continue to work closely with South West London Fraud Partnership to return properties into use, where fraudulent activity has been detected. It is hoped that the current recovery rate will be maintained meaning that the forecast for 2018/19 would be for the recovery of 12 properties, through successful investigations, rejection of 15 fraudulent housing applications and withdrawal of six fraudulent Preserved Right to Buy/Right to Acquire applications.

In addition, the Council will continue to actively work with private landlords of empty properties and offer advice and financial assistance (where necessary) to bring these properties back into use where it is agreed that these homes will then be available to the Council to meet housing demand. Where an empty property is the subject of regular complaints from neighbours, the Council may consider a compulsory purchase of the property, albeit this is a last resort given the time intensive nature of such approaches.

ENSURE THE HOUSING NEEDS OF GYPSY AND TRAVELLERS ARE ASSESSED

The Council has a legal requirement to assess the Housing needs of Gypsy and Travellers under the Housing Act 2004; such research was undertaken with RHP in 2016 which established the churn and capacity of the site. It confirmed that there is no requirement for the Council to provide additional pitches. There is one existing gypsy and traveller site, containing 12 pitches, in the Borough at Bishops Grove, Hampton, managed



by RHP, who holds an indefinite licence for the site. The site, which has seen investment and improvement, is able to accommodate the appropriate level of pitches needed. The Council monitors occupation of the site through its Annual Monitoring Report.

IMPROVE HOUSING MANAGEMENT STANDARDS FOR RESIDENTS IN PRP ACCOMMODATION THROUGH THE WORK OF THE TENANTS' CHAMPION PROVIDING A COMPLAINTS RESOLUTION SERVICE AND SUPPORTING BETTER MULTI AGENCY WORKING ON COMPLEX CASES.

There has been considerable organisational change, both for the Council and also for PRPs, (many of whom have made substantial changes including mergers) and changes to how services are delivered as a result of financial constraints. The need for clear lines of communication and good joint working has never been greater. The Council will therefore continue to support this unique Tenants' Champion Service.

In particular, the Tenants' Champion Service will support the delivery of multi-agency training to share knowledge and provide opportunities that re-emphasise how the Mental Health and Housing Joint Working and Hospital Discharge Protocols should be used. This training will enable frontline housing, community safety and mental health staff to share best practice.

In relation to anti-social behaviour this service will develop its work with the Community Safety Team and PRPs to tackle some of the more complex cases, and will ensure that there is strong representation for tenants at the Community Multi Agency Risk Assessment Conference (MARAC).

Contact details for the Tenant Champion are [available here](#).



Theme Four: Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options

Our objectives are to:

- Support residents affected by welfare reform and prepare for the implementation of full service Universal Credit
- Reduce fuel poverty for low income and vulnerable households
- Deliver a programme of home adaptations to people with disabilities so that they can remain living independently
- Support opportunities which will improve the housing offer for older people, including those with care and support needs and extra care housing
- Support the development and implementation of mental health and learning disability accommodation pathways and supported accommodation for looked after children and care leavers as they move towards independence
- Have plans in place to provide move on accommodation from temporary supported housing to ensure its continued effective use
- Ensure the Council and partner PRPs play an active role in promoting the safeguarding of children and adults from harm

Why is this important?

Since the previous strategy there have been changes to the Benefit Cap levels that people can receive and developments to the UC timeline implementation in LBRuT. The Social Sector Size Criteria (SSSC) remains unchanged in its policy. Currently the Borough has approximately 500 claimants affected by the SSSC (which is a 40% drop since its introduction in April 2013). There has been an increase in total claimants affected by the changes to the Benefit Cap, due to this being reduced from £26,000 to £23,000 for families and £18,500 to £15,410 for single households, living in London. UC was implemented in the Borough for new, single claimants from November 2015 and is due to be rolled out to all claimants from June 2018, to

include couples and families. Currently the Borough has 877 UC claimants, with 501 including a housing element. Feedback from PRPs who have experience of tenants moving onto UC have reported that arrears levels rise when some households move onto UC and that UC is time intensive for their officers who work with colleagues in the Department of Works and Pensions (DWP) to ensure that any disruption in benefit payments are minimised.

It is estimated that 7.4% of households in LBRuT are fuel poor or in fuel poverty which is lower than the average for London at 10.1%¹¹. Fuel poverty occurs when a household's income fails to meet the cost of heating and powering the home adequately. It creates health problems ranging from poor mental health, to childhood asthma and excess winter deaths, particularly amongst older people.

The Council is part of the Joint Health and Wellbeing Board, together with the Clinical Commissioning Group (CCG) and other relevant partners all of whom recognise that good quality housing plays a vital role in the health and wellbeing of everyone, in particular those who are vulnerable due to disability, poor health or old age.

As set out in the [Council's Extra Care](#) evidence base there is a demand for affordable extra care accommodation, providing rented and shared equity housing in the Borough. The research identified that many older people with care needs want to remain in their own home but would consider moving to an extra care scheme especially if it is near where they currently live and was well designed to meet their needs including, where appropriate, wheelchair access. In addition to this there is an identified need for 'dementia friendly' accommodation to support those with elderly mental illness. With the number of people with dementia expected to increase appropriate accommodation pathways need to be in place. [The Retirement Housing Review](#) also confirmed the growing need for a range of suitable housing for

¹¹ Department for Business, Energy & Industry Strategy – Sub Regional Fuel Poverty England (2015 data)



older people across a mix of tenures. The research estimates that 145 additional units of retirement housing are required to address the shortage, in addition to the 81 units of extra care housing by 2020. The research notes that some of these additional retirement units can be achieved through re-modelling existing sheltered accommodation that is no longer fit for purpose. In the case of Extra Care Housing the research also recognises that where this is located within the Borough it is important to ensure there is a geographical spread.

The need for improving accommodation options available to vulnerable people is highlighted in service strategies such as the [Mental Health Joint Commissioning Strategy for Adults](#) of working age (2010 -2015) and the [Learning Disability Commissioning Strategy](#), which both seek to provide better local accommodation options for people who have support and/or care needs. There are approximately 1,500 people who live with a severe mental illness in the Borough, these are often complex in nature with multiple diagnosed conditions and therefore the appropriate supported housing or support package is vital. The Council has established a Mental Health Accommodation Pathway which adopts a Recovery Model approach to support people as needed offering different levels of supported

accommodation options. The Learning Disability Service works with people accessing their services to assess and plan for their accommodation needs. The service has reported a shortfall of 4-6 units per annum of bespoke specialist units of supported accommodation to address the needs of people who might otherwise be placed in expensive residential care settings. There is also a requirement for more self-contained units of supported accommodation that can be flexibly used to meet a broader range of needs, using either re-lets from social housing stock or cluster nominations to some new build schemes with the deficit for this type of accommodation estimated to be around six per year. A key aim of the strategy will therefore be to reduce this shortfall in supported accommodation.

What we plan to do

SUPPORT RESIDENTS AFFECTED BY WELFARE REFORM AND PREPARE FOR THE IMPLEMENTATION OF FULL SERVICE UNIVERSAL CREDIT

The Council is dedicated to supporting vulnerable households affected by Welfare Reform and will continue to utilise Discretionary Housing Payments (DHP) to assist. Dependant on circumstances residents

on Housing Benefit or the Housing Element of UC may be entitled to assistance with their housing costs through DHP. DHP is a temporary payment and paid to provide vulnerable households time to find long term affordable housing solutions. There is no automatic right to receive it and each request is dealt with on a case by case basis. For the Financial Year 2017/18 the Council was allocated a DHP fund of up to £349,000 by the DWP and as at 30th September 2017 the Council had spent £203,000.

Those affected by the SSSC may require moving to more appropriately sized accommodation. The Council supports social housing tenants to move via their Sponsored Moves Scheme and other transfer schemes (as set out in more detail in Theme three - Ensuring Good Quality Homes; providing choice, standards and quality for renters).

To facilitate the forthcoming roll out of UC, the Council has created an internal UC Implementation Board, and through the established Welfare Reform Group brings together key external stakeholders to help build strategies to ensure the smoothest transition possible. RHP has recently joined the DWP UC Trusted Partnership Scheme, to help strengthen their relationship with the DWP, working together to resolve any issues. During the consultation process it was expressed that support for those experiencing financial difficulties and making better use of the DHP fund should be explored. It is envisaged that the UC Implementation Board will look at the impact of UC and provide positive feedback on this workstream, recognising the ongoing need to improve partnership working in this area to minimise the impact on our residents.

REDUCE FUEL POVERTY FOR LOW INCOME AND VULNERABLE HOUSEHOLDS

Cold Buster Grants, which fund central heating, new boilers and other energy efficiency works, are considered for those who are 60+ on a means tested basis or in receipt of a list of relevant benefits, such as DLA. Between January 2016 and November 2017 Cold Buster Grants (along with other energy efficiency measures) were provided to 106 residents, compared to 91 fitted in the previous two years. The scheme will continue to be promoted through the Resettlement

Team, Family Support Team and the Family Information Service to ensure vulnerable households are aware of this service with a target of 50 grants issued per year, but a scope to go over target where there is demand.

The Council continues to work in partnership with the voluntary sector promoting the valuable work carried out by the Hampton Fuel Allotments, a registered charity in the Borough, that provides fuel grants for households on certain state benefits or low waged households who fulfil the relevant criteria and reside in Hampton, Teddington and Twickenham. On average, they provide between 1,600-1,800 fuel grants to residents a year. The Barnes Workhouse Fund, which covers the SW13 postcode, will assess referrals from individuals received from referral agencies. A grant may be awarded towards fuel costs or arrears, but is unlikely to support successive applications for the same reason. Public Health has commissioned [WRAP \(Wandsworth and Richmond Assessment Point\)](#) which provides free home assessments in assisting people (especially the elderly, those with disabilities and living with long term conditions) to keep their home warm and get help with benefits. The Council's Resettlement Service supports new tenants in social housing to access grants from the many charities that support the Borough's vulnerable residents.

The Council will work in partnership with the Mayor of London to support the agreed objectives set out in the draft Fuel Action Plan and take any relevant actions to increase energy efficiency and support those in fuel poverty.

DELIVER A PROGRAMME OF HOME ADAPTATIONS TO PEOPLE WITH DISABILITIES SO THAT THEY CAN REMAIN LIVING INDEPENDENTLY

The Council is committed to assisting older and disabled people to remain living independently in their own home. The Home Improvement Agency (HIA) will continue to work closely with the Occupational Therapy Service to provide adaptations in the home for residents who have mobility issues or need adaptations due to old age. The HIA has sufficient grants in place of over £7m from 2017-18 to 2022-23 to provide Disabled Facilities Grants (DFGs). DFGs are used to help people requiring adaptations to

their homes and on average allow residents to live independently for an additional five years. Although the Council has been able to complete on average 121 DFGs per year since the previous strategy, the target for 2018/19 has slightly reduced to 116 completions due to changes in service capacity, which is being addressed. The Council is recruiting additional staff to increase capacity.

The Council will continue to work in partnership with the Joint Health and Wellbeing Board to support the Better Care¹² and [Prevention Framework](#) which sets out actions and prioritises resources across a range of service areas that can defer the need to access care and support.

SUPPORT OPPORTUNITIES WHICH WILL IMPROVE THE HOUSING OFFER FOR OLDER PEOPLE, INCLUDING THOSE WITH CARE AND SUPPORT NEEDS AND EXTRA CARE HOUSING

To meet the current housing priorities for older people the Council will ensure that any new accommodation proposed for older people meets the evidential need in the Borough as highlighted in the [Extra Care Evidence Base](#), [Retirement Housing Review](#) and the Council's Planning Policies. The Council will work with PRPs of Sheltered Housing where there are concerns that the quality of housing on offer is no longer meeting the needs of existing tenants or the wider strategic housing need. It is not appropriate in the Council's view to continue to provide older people's accommodation where there are shared facilities and approaches need to be found to modernise schemes to provide accessible and self contained accommodation.

The Council will therefore support, where appropriate, the re-modelling or re-provision of existing older people's sheltered accommodation to provide self-contained homes which addresses identified local housing need. It is recognised that Extra Care Housing in some cases can be created from remodelling existing sheltered accommodation. The development of Extra Care Housing should also be focussed on the level of care required by the user rather than an arbitrary age criteria. Extra Care Schemes that meet the needs of adults using the Learning Disability

Service or the Dementia Service are to be considered as part of this housing offer.

A new funding model for Supported and Sheltered Housing was proposed in January 2018 and the Borough provided a response to this consultation. The proposal includes, long-term and sheltered services funded through the benefits system, a 'sheltered rent' for sheltered and Extra Care Housing and housing costs for short-term services to be paid through local councils. It is welcomed that the Government recently announced that rents for long term supported housing schemes will no longer be subject to the LHA cap, which could have led to significant income shortfalls and potentially scheme closures. Proposed changes to the funding model may have an impact on service delivery and future plans in this area.

SUPPORT THE DEVELOPMENT AND IMPLEMENTATION OF MENTAL HEALTH AND LEARNING DISABILITY ACCOMMODATION PATHWAYS AND SUPPORTED ACCOMMODATION FOR LOOKED AFTER CHILDREN AND CARE LEAVERS AS THEY MOVE TOWARDS INDEPENDENCE

Learning Disabilities

The Council is working in partnership with PRPs to meet specific identified needs for young adults with complex needs, including the disposal of land to enable the delivery of supported housing. The Council has identified a further site for disposal that can provide an opportunity to build specialist housing for those with learning disabilities; PA Housing has secured planning permission for this and an additional four units of supported accommodation, will be provided.

LBRuT has also disposed of Council land to RHP to develop a 23 unit housing scheme that will contain three independent flats for use by people accessing the Learning Disability Service as well as a shared house for five service users with higher support needs. These homes are part of a general needs rented housing scheme and the site will also re-provide a modern smaller care home that can offer accommodation for ten people unable to currently

¹² The Better Care Fund is a programme spanning both the NHS and LAs which seeks to join-up health and care services, so that people can manage their own health and wellbeing, and live independently in their communities for as long as possible.



access independent accommodation. Grant funding for this scheme is being provided by the GLA's Affordable Housing Programme.

The Council has sold surplus caretaker accommodation for use as supported housing to PRPs. These properties are often detached and in a relatively secluded environment, which lends it to be developed as a supported housing option. For people with lower support needs the Council has identified a number of self-contained independent homes, particularly in new developments that are in the existing housing programme, where a small cluster of units can provide the security and support necessary to enable households to live independently within the community. The Council will continue to review all new build schemes to identify opportunities to increase self-contained independent units of accommodation that can meet the needs of vulnerable residents.

Mental Health

The Council is working with the CCG and Social Care Commissioners to develop an improved Mental Health Supported Housing Pathway, reviewing with Providers where services are no longer actively supporting people within a Recovery Model. Some services have been decommissioned and others

increased, notably the expansion of floating support services. Six homes identified as low level supported housing, have been brought back into use as general needs rented housing. These units were mainly shared therefore were unsuitable for providing the appropriate level of support required. In November 2017 the Council completed a procurement exercise for a Mental Health Accommodation Pathway which has increased the level of support in existing services. This includes some service provision directly provided by the Council providing 24 hour support in a shared environment. In the medium term, this accommodation will be re-provided in self-contained accommodation, providing an environment more suited to the delivery of recovery based outcomes. This model can better prepare people with medium to high levels of mental health to progress through the recovery model towards regaining independence. To this end the Council is working with a local PRP to explore a land swap that could have the potential to develop a new extra care facility and also procure two sites for mental health service use.

However, there is still a need to continue to provide a sufficient supply of step down accommodation to support recovery and to ensure that high support places remain available to provide local community based services. Research by South West London CCG

and St. Georges identified 90 service users in high cost or out of borough placements, whose needs could be better met through high support accommodation. The availability of sufficient housing options is key in supporting people to recover and remain well and to avoid unnecessary or lengthy stays in hospital. Thus, despite the increase in supply there is still a need for additional high and medium support services as alternatives to residential care.

As part of the redesign of Mental Health Services for the SSA, the Council will be developing a joint (Richmond and Wandsworth) Accommodation and Projects Team, who will focus on supporting people to access the right accommodation at the right time to help them manage their mental health. This is based on the Recovery Model, designed to help people to stay in control of their life despite experiencing a mental health problem; focussing on promoting independence and building resilience, and not just treating or managing symptoms. The consultation responses highlighted the need for improved housing options for people with mental health problems. The Council is fully committed to developing the joint work undertaken in this area with partners to improve the mental health accommodation pathway. This not only covers the provision of more supported housing, but also the time taken to assess the needs of people with mental health issues.

HAVE PLANS IN PLACE TO PROVIDE MOVE ON ACCOMMODATION FROM TEMPORARY SUPPORTED HOUSING TO ENSURE ITS CONTINUED EFFECTIVE USE

The Mental Health Accommodation and Projects Team will manage the accommodation pathway for the SSA Mental Health Service and this will include completing social care assessments and identifying people to move into and on from (when they are able to sustain a greater level of independence) the supported accommodation in LBRuT that will be provided by Look Ahead. This team will work in close collaboration with the Housing Solutions Service to access general needs accommodation from PRPs where appropriate, via the supported queue.

The Council is committed to working with partners to reconfigure the mental health accommodation

pathway which will result in an increase in total capacity from 84 to 111 units, enabling people to access supported housing within their community and reducing admissions to acute, non-acute and health-based services. This is currently in progress and due to complete during 2018/19.

Children and care leavers

The Council is also working with AfC to develop a much needed Children's Home, given the over reliance of out of borough placements for Children Looked After who should be located within their home area. A site has been identified and the Council has an option agreement to purchase. The site can be developed quickly to support a six bedroom Children's home.

As set out in Theme 2 - Addressing housing market pressures, preventing homelessness and increasing housing option: Homelessness Strategy Objectives 2018-2023, the Housing and Regeneration Department has agreed a joint working protocol when dealing with homeless 16 and 17 year olds, whereby joint assessments are carried out with AfC to determine the most appropriate accommodation option in each given circumstance.

The Housing and Regeneration Department will continue to work closely with AfC to ensure young care leavers are able to find settled accommodation when they are ready for independent living. Care leavers may be given priority need for housing via the social care queue and any assessment of their housing needs is done jointly with the care leaving service. AfC can also support a care leaver to reside in a fully furnished property as part of their tenancy with a landlord in the private sector by paying their first month's rent and deposit, as part of the Leaving Care Grant/Setting Up Home Allowance. Once a care leaver has moved, they will have the ability to seek on-going support from the Resettlement Team or AfC.

Other vulnerable groups

The Council has various housing access queues which are open to applicants who are eligible and qualify for social housing, where the Council accepts that they require housing and they have been nominated by either social services or other approved partner support agencies (including domestic abuse refuges).

This includes those with mental health illnesses, ex-offenders, learning disabilities, care leavers and those living in refuges or other supported accommodation requiring resettlement. The Council has also signed up to the Armed Forces Covenant to recognise the need to assist those leaving the Armed Forces into settled accommodation.

As set out in Theme 2 - Addressing housing market pressures, preventing homelessness and increasing housing option: Homelessness Strategy Objectives 2018-2023 the Resettlement Team work directly with vulnerable people, where a duty to house them has been accepted. The team will support vulnerable clients from temporary accommodation into settled accommodation and can help set up benefits/bills, access furniture, apply for grants, act as an advocate, help find a GP and make referrals to other agencies. The team will continue to work jointly with other agencies to obtain the best outcome for their clients, including ensuring appropriate support plans are in place.

The Council's Housing Services will continue to operate the Safety First Scheme in partnership with the Police's Community Safety Unit. Safety First is a scheme that provides additional security measures within the home to ensure victims of domestic abuse, hate crimes or vulnerable/older victims of crime can continue to remain there safely therefore preventing homelessness. Measures can include extra locks, installation of a Careline alarm and referrals onto other services. The Housing and Regeneration Department will also continue to be an active member of the MARAC, to ensure multi-agency plans are in place to support the most high risk victims of domestic abuse.

ENSURE THE COUNCIL AND PARTNER PRPS PLAY AN ACTIVE ROLE IN PROMOTING THE SAFEGUARDING OF CHILDREN AND ADULTS FROM HARM

LBRuT is committed to protecting the welfare of children and vulnerable adults and is a regular partner on both the Adults and Children Safeguarding Boards. As set out in Theme 2 - Addressing housing market pressures, preventing homelessness and increasing housing option: Homelessness Strategy Objectives



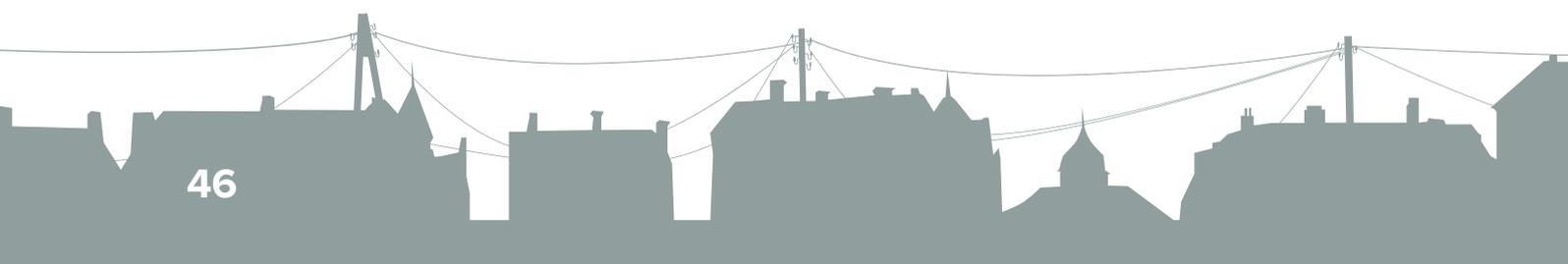
2018-2023 and Theme 4 – Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options, the joint working protocols between housing and AfC when dealing with homeless 16 and 17 year olds and the mental health and hospital discharge protocols between partner agencies have been reviewed. The Housing and Regeneration Department is currently working on agreeing an overarching safeguarding children's protocol with AfC and reviewing the safeguarding adult's protocol, with Adult Social Services and Mental Health Services. The Council completes an annual safeguarding audit, to ensure the needs of children and vulnerable adults are being considered through our processes and procedures. We will continue to ensure PRPs are involved in the appropriate sub groups, have access to training and that our staff complete safeguarding and refresher training every three years.

Appendix 1. Richmond Housing & Homelessness Strategy Action Plan Year 1 (2018/19)

Action	Target 2018/19	Lead Officer(s)
Delivering affordable homes; new supply and redevelopment of existing social housing stock		
Maximise the delivery of affordable housing via the Affordable Homes Programme.	Deliver 39 units to rent and 29 units for Shared Ownership.	Strategy & Development
To review current partner and delivery arrangements with private registered provider partners.	In liaison with developing and stock holding PRPs in the Borough consider options to put in place more formal Housing Delivery Plans between the Council and the RPs to increase local housing supply and optimise use of Council grant funding.	Strategy & Development
Promote innovative forms of intermediate housing.	To support RHP in their proposals to provide low cost rented accommodation through development of their LaunchPOD product on one site in Richmond.	Strategy & Development
To introduce a Do It Yourself (DIYSO) scheme, providing equity loans support to make home ownership more affordable.	To present a report to Cabinet on a proposed DIYSO scheme by March 2018. Subject to approval appoint provider and launch scheme in Autumn 2018, with an aim of delivering an initial 20 purchases, realised over a 24 month period.	Strategy & Development
Support the delivery of Ham Close regeneration objectives by seeking to secure a third of new housing as affordable.	RHP to ensure a planning application is submitted in December 2018 and for works to commence in Summer 2019. Development Team to provide advice and support to ensure affordable housing delivery is maximised.	Strategy & Development
Where appropriate consider the disposal of Council assets to PRPs to deliver new affordable units.	To take forward arrangements in liaison with Property Services to deliver new affordable units on four sites already identified for disposal for affordable housing purposes.	Strategy & Development/ Property Services
Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023		
Successfully implement the Homelessness Reduction Act 2017 from April 2018.	<ul style="list-style-type: none"> To recruit to posts as set out in 16th November 2017 Cabinet Report To set up a cross-departmental HRA implementation group To form a strategic partnership with Citizens Advice Richmond and other voluntary organisations, to agree advice and referral pathways 	Housing Services

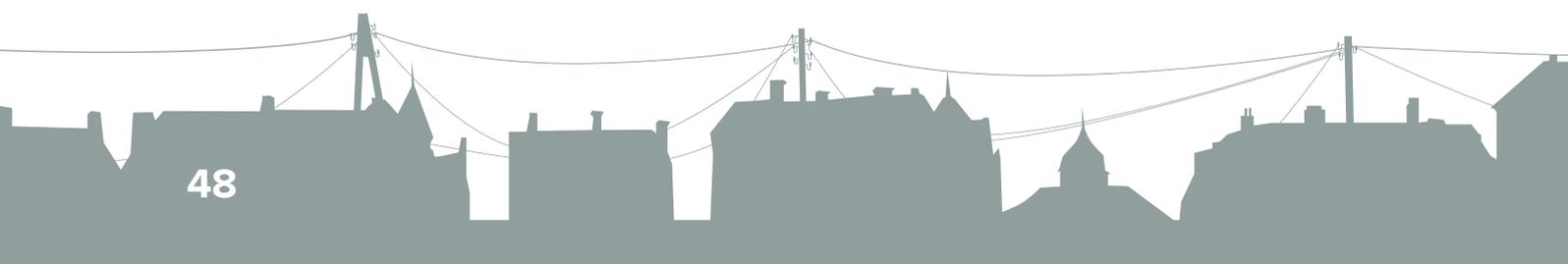
Action	Target 2018/19	Lead Officer(s)
	<ul style="list-style-type: none"> To invest £100,000 into London Plus Credit Union, who can make affordable loans available to clients 	
	<ul style="list-style-type: none"> Engage through the voluntary sector forum with agencies likely to be involved in developing personalised housing plans 	
	<ul style="list-style-type: none"> Train officers in areas such as financial assessments, mediation, negotiation and motivational based interviewing skills, moving from investigators to negotiators/facilitators 	
	<ul style="list-style-type: none"> Implement a multi-agency approach, including hosting a conference with partners, facilitate SPEAR and other providers of supported housing to contribute to the performance of the duties under the HRA 	SPEAR/Housing Services
To provide a new offer to landlords to include enhanced incentives to work with the Council to rehouse residents.	<ul style="list-style-type: none"> To review the landlord package including providing a list of incentives, such as one off payments, direct payments etc 	Housing Services
	<ul style="list-style-type: none"> To advertise the offer to landlords, by 'tell a friend' payments from other landlords, social media (Councils Twitter and Facebook), a local newspaper and contacting local estate agents 	
	<ul style="list-style-type: none"> To review PIs to monitor success of new initiatives 	
Through an acquisitions programme reduce the use of nightly paid self contained accommodation and B&B by increasing the supply of self-contained homes for use as temporary accommodation.	Gain Cabinet approval for the use of Housing Capital Programme funding to acquire a supply of housing which can be used for temporary accommodation.	Housing Services/ Strategy & Development
Reduce number of households in Temporary Accommodation, as a result of prevention and relief following the HRA.	Reduce temporary accommodation use by 66 placements.	Housing Services
Maintain and where possible enhance rough sleeper services to reduce rough sleeping through the ongoing provision of effective outreach services.	<ul style="list-style-type: none"> In conjunction with the CCG, explore options to set up a clinical network for multi-agency case management review of vulnerable homeless clients and hold two training events for health agencies, in working with homeless people 	SPEAR

Action	Target 2018/19	Lead Officer(s)
	<ul style="list-style-type: none"> Ensure the SWL outreach and Resettlement service funded by the MHCLG is monitored through a performance management framework 	
	<ul style="list-style-type: none"> Continue to support homeless people to train as peer mentors, integrate peer support in local homelessness services 	
	<ul style="list-style-type: none"> Support the continued provision of a specialist Homeless Health Link service and investigate funding opportunities post March 2019 	
	<ul style="list-style-type: none"> Support, through additional funding bids, the continued provision and any funding applications that provide a specialist supported housing service for homeless women with a history of domestic violence, mental health and rough sleeping 	Strategy & Development
Ensuring good quality homes; providing choice, standards and quality for renters		
Promote the most efficient use of existing social housing stock and maximise opportunities for social housing tenants to move home.	<ul style="list-style-type: none"> To move 25 through the sponsored moves scheme 	Housing Services
	<ul style="list-style-type: none"> To support PRPs to build social housing to provide opportunities to downsize where there is evidenced demand. 	Strategy & Development
	<ul style="list-style-type: none"> Where appropriate RHP to complete extensions to existing homes to relieve overcrowding 	RHP
	<ul style="list-style-type: none"> Investigate with other PRPs any opportunities to utilise their and/or Council unallocated funding to support extensions and de-conversions/ acquisitions 	Strategy & Development
Maximise available social housing stock through the detection and prevention of fraud.	<ul style="list-style-type: none"> Recover 12 properties through successful investigation 	South West London Fraud Partnership
	<ul style="list-style-type: none"> Reject 15 fraudulent housing applications 	
	<ul style="list-style-type: none"> Withdraw 6 fraudulent Preserved Right to Buy/ Right to Acquire applications 	
Improve conditions in the private sector by tackling hazardous conditions.	Improve 60 premises through informal intervention	Private Sector Housing
	Remove hazards in 75 premises	



Action	Target 2018/19	Lead Officer(s)
	Serve 75 preliminary and statutory enforcement notices	
	Implement any actions arising from the HMO licensing reforms	
Review policies to ensure the requirements under the Housing & Planning Act 2016 are met.	Where a landlord is convicted of a housing related offence ensure they are entered onto the national rogue landlord database	Private Sector Housing
	Where appropriate use financial penalties to improve standards for renters	
To work with partners to ensure that any recommendations from the Independent Review of Building Regulations and Fire Safety are actioned.	To ensure partner PRPs and private sector are undertaking remedial work as required.	Strategy & Development /PRPs/ Private Sector Housing
Working with PRPs, seek to maintain and improve housing management services and joint working with the Council and other public sector services.	Hold a Tenants' Champion Multiagency conference - Understanding Risk in March 2018.	Strategy & Development
Support the needs of vulnerable residents, working with care and support services to provide quality housing options		
Support vulnerable residents affected by welfare reform.	To keep under review the Council's DHP policy and monitor the budget to ensure this is being used effectively.	Revenue Services
Reduce the shortfall in supported housing accommodation as identified through the Council's commissioning plans for Adult Services and Achieving for Children.	<ul style="list-style-type: none"> In 2018/19, in liaison with Property Services and Adult Social Services, to complete a land swap arrangement between RHP and LBR, that will enable RHP to deliver up to 50 units for extra care housing and LBR to re-provide 20 units of mental health pathways 	Strategy & Development /Property Services/Adult Social Services accommodation in future years
	<ul style="list-style-type: none"> To work in partnership with PRPs to deliver schemes in the pipeline including 4 new build supported housing units for learning disabilities in 2018/19 	Strategy & Development /Adult Social Services
	<ul style="list-style-type: none"> In liaison with Adult Social Services and AFC, review all new build schemes that include 1 bed affordable rented accommodation to identify opportunities where these units could be utilised as move on accommodation for supported housing residents capable of more independent living 	Strategy & Development /Adult Social Services

Action	Target 2018/19	Lead Officer(s)
	<ul style="list-style-type: none"> AfC to develop a six bedroom children's home subject to approvals. 	AfC
Progress an evidence base focussing initially on development of older people, mental health and learning disability to inform commissioning strategies and services.	<ul style="list-style-type: none"> Work with partners to progress the commissioning strategies to identify future need including; 	Adult Social Services / Strategy & Development
	<ul style="list-style-type: none"> Reviewing older peoples housing costs against the eligibility of housing benefit 	
	<ul style="list-style-type: none"> Reviewing commissioning structures for rough sleepers 	
	<ul style="list-style-type: none"> Re-tendering supported housing for ex-offenders 	
	<ul style="list-style-type: none"> Mapping flows within supported accommodation 	
Continue to support and meet the demand for adaptations, to assist older and disabled people to remain living independently in their own home.	Complete 116 DFGs	Housing Services
To reduce fuel poverty for low income and vulnerable households.	<ul style="list-style-type: none"> Deliver 50 cold buster grants 	Housing Services
	<ul style="list-style-type: none"> Consider the actions arising from the Mayor of London's Fuel poverty action plan due to be published in 2018 	
Support the development of an improved mental health supported housing pathway.	<ul style="list-style-type: none"> By April develop a joint (Richmond and Wandsworth) 	Adult Social Services
	<ul style="list-style-type: none"> Review 80% of clients annually to ensure accommodation needs are met 	
	<ul style="list-style-type: none"> Support the reconfiguration of the mental health accommodation pathway to increase capacity from 84 to 111 units 	
To ensure the Council plays an active role in promoting the safeguarding of children and adults from harm.	<ul style="list-style-type: none"> To agree overarching safeguarding protocols for both children and adults by March 2019 	Strategy & Development
	<ul style="list-style-type: none"> Ensure all staff complete safeguarding training every 3 years and promote safeguarding awareness to partner PRPs 	



Appendix 2. Temporary Accommodation Procurement and Placement Guidelines

Richmond Upon Thames Council

Temporary Accommodation Procurement & Allocation – Policy guidelines 2018

Statutory guidance and regulations considered	<p>Homelessness Code of Guidance for local authorities, issued by the Secretary of State under s182 (1) in 2006, generally and paragraphs 16.7 and 17.41 specifically.</p> <p>The Homelessness (Suitability of Accommodation (England) Order 2012 (SI 2012/2601) generally and article 2 specifically.</p> <p>Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation (England) Order 2012 generally and paragraphs 48 and 49 specifically.</p>
Scope	<p>These guidelines are applicable to both the provision of temporary accommodation which does not bring the s193(2) duty to an end and to Private Rented Sector Offers made to bring that duty to an end. With effect from the 3rd of April 2018, they also apply to accommodation offered present to either the prevention or relief activities/duties incorporated in Part VII by the Homelessness Reduction Act 2017.</p>
Contextual information	<p>These policy guidelines are recommended and adopted in response to the judgement of the Supreme Court in the case of (TN) Nzolameso v Westminster City Council (2nd April 2015).</p> <p>That judgement recommended that each local authority has policies in place and approved by elected members of the Council detailing:</p> <ul style="list-style-type: none"> a) how the council will secure sufficient units of temporary accommodation to meet anticipated demand for the coming year reflecting its’ obligations under both the 1996 Housing Act and the Children Act 2004 and b) How the Council will allocate such units of temporary accommodation as are available to individual homeless households, to which reference can be made when deciding and explaining who will or will not be allocated accommodation in and out of district. <p>The Council’s Housing and Homelessness Strategy for the period 2018-2023 was approved by the Council’s Cabinet on the 15th March 2018 including these guidelines that report, which is essential reading to understand the full context in which they operate. The summary below sets out in broad terms the local housing and homelessness context.</p>



The Housing and Homelessness position in the borough as at the 31st January 2018.

The Borough, in common with the majority of London boroughs, is facing significant demand for statutory homelessness services which are expected to expand, once the Homelessness Reduction Act changes take effect.

As at 31/1/18, the Council was providing temporary accommodation for 275 households (all household sizes); the use of temporary accommodation has remained relatively stable over the period of the previous strategy 2013-2018. However, during that period, the use of such accommodation by the London Boroughs collectively has increased significantly and this has made the market place for good quality accommodation much more competitive.

Within that London wide increase, homelessness from the private rented sector has risen sharply to be largest single cause of homelessness.

The borough is affected by the national cap on local housing allowance (LHA) levels (set at a maximum of £400 PW regardless of property size) and has significant numbers of households affected by the cap on total welfare benefits (currently set at £500 PW regardless of household size).

Rents levels within the Private Rented Sector have risen significantly over recent years, as have property prices in the borough.

At the 31/1/18, 78 per cent of all temporary accommodation used at the close of the year was located within the Borough, with a further 17 per cent located in the neighbouring borough of Hounslow. 4 per cent was elsewhere in London and 1 per cent accommodated outside of London.

The majority of out of borough placements comprises self-contained, nightly paid annex type accommodation, of which there is a very limited supply within the Borough, occupied on a spot purchased basis often at short notice.

Out of the 275 placements made at the end of January 2018, only three households were placed into Bed and breakfast accommodation whereas the other 272 were spread across other types of temporary accommodation, which, by a large majority, provide self-contained accommodation.

Most households placed into temporary accommodation are reliant, in part or in whole, on housing benefit/local housing allowance to meet their accommodation changes/rent.

During the first 10 months of 2017/18, 256 households were placed into temporary accommodation for the first time; an average of 25 households per month. The pattern of placements is not predictable or smooth and monthly totals ranged from 42 (in December 2017) to 15 (in June 2017).

In the same period, some 168 households were accepted, after assessment, for the main s193(2) duty.

The Council forecasts that its' use of temporary accommodation during 2018/19 will decrease by net 66 placements, as the Homelessness Reduction Act changes are made successful.

Arrangements for procuring temporary accommodation.

The Council has various supply streams providing temporary accommodation. These include working with known accommodation providers/letting agents for bed and breakfast (not self-contained), bed and breakfast annex (self-contained), other nightly paid self-contained properties and include working with individual landlords for individual properties, secured on longer terms leases (3-10 years), and managed by the Council's in-house team or secured as a Private Rented Sector Offer.

Further the Council has a standing stock of hostels, within the Council's freehold ownership and managed by the in-house team. However, these largely cater for smaller households needing 2 bed rehousing.

The Council does not have any 'sole' provider arrangements with third party accommodation providers, most of who work with and across multiple Councils/Council areas. The marketplace is often characterised as a sellers, rather than a buyers, market.

Affordability Considerations

Both secondary regulations, statutory guidance and relevant case-law make clear that affordability is a key component of the suitability of accommodation and that unaffordable accommodation may not be regarded as suitable. For the purposes of these guidelines 45% of total income has been used as the maximum amount that should be spent on housing costs including rent.

For non-working households not exempted from the total welfare benefit cap the applicable maximum amounts paid by the DWP are as follows:

For Greater London, the cap is:

- £442.31 per week (£23,000 a year) for a couple, whether children live in the household or not
- £442.31 per week (£23,000 a year) for a single parent with children
- £296.35 per week (£15,410 a year) for single childless people, or with children living elsewhere

Applying 45% to those amounts the relevant notional maximum rent affordable to those subject to the cap are as follows:

Couple = £200 per week (rounded up)

Single parent with children = £200 per week (rounded up)

Single childless person = £134 per week (rounded up)

The availability of properties within and outside the borough

Where the Council is making placements under homelessness provisions i.e. under the interim duty, and especially where there has been little or no notice of homelessness arising e.g. in scenarios of domestic or other violence/harassment, accommodation choices can often be limited, and sometimes as low as one property only.

For emergency type placements, there are no bed and breakfast establishments within the borough that works within the homeless persons market. As such, through necessity, many such emergency placements will be to accommodation outside the borough, often in adjacent boroughs but regularly to areas further afield within and outside of London.

On the 13th February 2018, the following research was undertaken using the 'Rightmove' website to indicate the number of self-contained properties then made available for rent. That website was used on the advice of the Council's Valuation Service.

The distances involved and noted in the tables below reflect the 'distance from' filter used within that website.

The reference point was 'Richmond BR station' (which is approximately the 'middle' of the borough).

£800 pcm was used to limit the search parameters to equate to £200 per week for couples with and without children or single parents with children and £600 for single people without children

The filter limiting 'distance from' only covers the London Borough of Richmond when the '1 mile' filter is used.

All greater distances capture properties in and outside of the borough.

Results for couples/single parents with children (£800 pcm)

Property Size	Studio/1bed	2bed	3bed	4 bed	5 bed
Distance from					
0 mile	1	0	0	0	0
1mile	3 *	0	0	0	0
3 miles	13	0	0	0	0
5 miles	53	0	1	0	0
10 miles	190	2*	1*	0	0
15 miles	372	2*	20*	0	0
20 miles	512	2*	20*	0	0
30 miles	915	53	20*	0	0
		(Reading) (Gravesend (Luton)			
40 miles	1217	145	2 flats only5*	0	
			(Chatham) (Luton)		

• Includes 2 flat shares or flat share only

Results for single people without children (£600pcm) = studios/1 bed only.

Property Size	Studio/1bed	2bed	3bed	4 bed	5 bed
Distance from					
0 mile	0				
1mile	1*				
3 miles	2*				
5 miles	13				
10 miles	26				
15 miles	58				
20 miles	72				
30 miles	125				
	(Sidcup)				
	(Harlow)				
	(Luton)				
40 miles	177				

- Includes 2 flat shares or flat share only

Conclusions: From the information contained in the tables above, it is obvious that, aside of properties within the Council's own stock, the availability of properties of the size needed by families with children at a rent linked to both the Total Welfare Benefit Cap and/or average wages/salary on the market within the Borough is extremely limited or non-existent.

Further, it must be remembered that, just because a property is notionally available, it does not follow that the landlord would be willing to consider taking a family from the Council; it is well known that many landlords take a business decision not to let to 'homeless' families or to families otherwise reliant on housing benefit/local housing allowance.

Based on her experience, the opinion of the Council's Accommodation Procurement Manager is that no more than a quarter to a third of private landlords would be willing to consider letting to a household referred by the Council, whether the tenancy is to be managed directly through the landlord or through an agent or by the Council directly under the Private Sector Leasing scheme.

As such, it is clear that it will very often not be reasonably practicable to secure accommodation, sourced through private landlords/agents for households, within the borough.

Rather it will often be necessary, because of the realities of the housing market, to source accommodation considerable distances away from the borough necessitating rearranging of schools for children and of other arrangements e.g. health related services and treatment.

The guidelines on the allocation of temporary accommodation

Explanatory notes:

These guidelines should be followed by staff when allocating/booking temporary accommodation for the placement of homeless households. They distinguish between priorities amongst descriptions of household circumstances to guide officers in deciding when to allocate temporary accommodation in borough, outside but close to the borough, further away from the borough but in London and outside of London if necessary.

These guidelines should not be followed blindly.

The golden rules are that, if accommodation in the borough is available, and if there is no known higher priority case for it, then the household being considered at the time should always be allocated that accommodation. If accommodation within the borough is not available, then accommodation should be allocated as close to the Borough as is available.

These guidelines should also be applied with reference to the individual circumstances of the household needing placement and the characteristics of the property or properties available for allocation to them.

Officers should use common sense when making allocations and not necessarily stick blindly to the following guidelines e.g. allocating a property just outside the borough where the household have good reason to prefer to be located in a part of the borough close to the (relevant) borough boundary, then out of borough accommodation may be a better allocation than in borough accommodation further away.

For example, if the household is from the Mortlake part of the council's district and have young children in schools in that area, an allocation of accommodation in the Wandsworth part of SW15 may be more preferable than in borough accommodation allocated in the Whitton area.

Bed and Breakfast and other emergency access accommodation

Where bed and breakfast or other non self-contained accommodation is all that is available officers should allocate in borough accommodation in all cases where such is available. Where in borough accommodation is not available officers should look to place as close to the borough as possible although these guidelines recognise that, for such emergency accommodation, choices are often extremely limited and entirely dependant on what is available on any given day or indeed any given hour of the day.

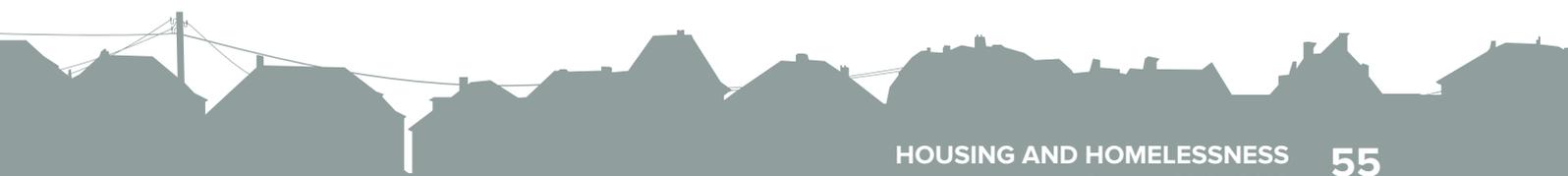
Self-Contained Temporary Accommodation

Self-contained accommodation located within Richmond

Priority will be given for:

- Families with children in education in the borough where those children are too young or otherwise unable to commute to school and back again unaccompanied.
- Families with children in special educational learning in Richmond in the borough unless there are good reasons to place outside of the borough.
- Families with a household member attending very regular outpatient or inpatient hospital treatment e.g. on a weekly or a fortnightly basis.
- Families with children coming up to major nationally assessed examinations in particular GCSEs.
- Families receiving very regular care from relatives/friends in the borough or providing very regular care to relatives/friends in the borough

Self-contained accommodation located in boroughs adjacent to Richmond or otherwise in the SW London sub region	<p>Priority will be given for:</p> <ul style="list-style-type: none"> • Families with children presenting a mix between those able to commute to and from school accompanied and unaccompanied. • Families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of at least monthly. • Families with employment in the borough at irregular hours which makes travelling to and from the workplace by public transport very difficult.
Self contained accommodation located elsewhere in London	<p>Priority will be given to:</p> <ul style="list-style-type: none"> • Families with children of an age able to commute to and from school unaccompanied. • Families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of greater than monthly. • Workless households.
Self-contained accommodation out of London	<p>Priority will be given to:</p> <ul style="list-style-type: none"> • Families subject to the total welfare benefit cap where closer accommodation is not available.
Approved on:	15th March 2018
Effective from:	16th March 2018
Review Date:	March 2020.



Appendix 3. Equality Impact and Needs Analysis (EINA)

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Housing and Regeneration
Service Area	Housing and Homelessness Strategy
Service/policy/function being assessed	Housing and Homelessness Strategy 2018-2023
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Keith Burnett /Martina Kane / Clare O'Connor
Date approved by Directorate Equality Group (if applicable)	EINA sent to ESSG and response provided via the consultation process
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	22nd December 2017
Date submitted to Directors' Board	4th January 2018

SUMMARY

Please summarise the key findings of the EINA.

Positive:

- The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, addressing housing market pressure and homelessness, ensuring good quality homes and supporting their needs.
- It is positive that there is not an issue with pregnant women or households containing dependent children being in B&B for longer than six weeks. This shows that temporary accommodation is appropriate for these households.
- According to the Census, 48% of residents in the Borough were married where 77.4% were homeowners, with or without a mortgage. Married people are more likely to be in a stable housing tenure.
- Lone female parents with dependent children made up 56% of accepted homeless cases. The measures in strategy will ensure that more homeless households are housed appropriately and there will be a greater emphasis on prevention.
- Additional resources will be secured to fulfil the new homelessness duties.
- To support victims of domestic violence, which disproportionately affects females, the Council will continue to commission Refuge to operate two refuges in the borough. Additionally, SPEAR and Refuge will work jointly to provide a specialist refuge for rough sleeping women with complex needs.
- A higher proportion of those with a long term health problems or disability, are homeowners than other groups, however a higher proportion also live in socially rented accommodation which could be due to difficulties accessing alternative forms of housing, such as the private rented sector. The strategy sets out the plan to deliver a programme of home adaptations to people with disabilities so that they can remain living independently. It also sets out its support of the development and implementation of mental health and learning disability accommodation pathway.

- Homelessness acceptances with mental health as the main vulnerability fell by 67% between 2012/13 and 2016/17, from 39 to 11.
- The 25-44 age group are overrepresented in homelessness acceptances in Richmond compared with the borough demographic. The strategy clearly sets out measures to tackle homelessness and implement the Homelessness Reduction Act to maximum effect. This includes: securing additional resources, working with partners to improve prevention, provide alternative housing solutions and to provide suitable accommodation for rough sleepers.
- Younger people are also less likely to be owner occupiers and more likely to rent privately. Therefore, they may find it harder to access homeownership and be at more risk of homelessness. The Council will maximise its resources and make best use of assets to deliver more affordable homes for residents on a range of incomes, including social rented, intermediate and other sub-market rent.
- Rough sleepers in Richmond in 2016/17 aged 46-55 were in a higher proportion than the Outer London average. The Council will maintain and where possible, enhance a well developed rough sleeper service.
- The Temporary Accommodation Procurement and Allocation guidelines 2018, has been included to ensure that procurement of temporary accommodation attempts to obtain accommodation in the borough, or as close as possible to it. If accommodation within the borough is not available, then accommodation should be allocated in the neighbouring borough, where possible. Where demand outstrips supply, priority for accommodation in the borough will take into account the individual circumstances. For example, families with children in education in the borough where those children are too young or otherwise unable to commute to school and back again unaccompanied, or families with a household member attending very regular outpatient or inpatient hospital treatment e.g. on a weekly. Priority for accommodation in a neighbouring borough will taken into account families with children presenting a mix between those able to commute to and from school accompanied and unaccompanied or families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of at least monthly.

Negative:

- Data on sexual orientation is not reported in Government homelessness returns but it is collected by LBRuT. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as “other”¹³, 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as “other”. The question is however non mandatory and applicants often do not complete the section. Measures will be implemented to ensure questions on housing and homelessness applications to the Council will be mandatory. Information in relation to the protected characteristics of religion and belief and gender identity is requested through the current online form. However, it is not mandatory; therefore, it is not robust enough to assess the impact of the Housing and Homelessness Strategy on these protected characteristics. Equality monitoring questions will be included in the new application forms for homelessness and housing which will be mandatory.

¹³ ONS (2015) Sexual Identity by Region, UK. Available from: www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentity-byregionuk

1. BACKGROUND

Briefly describe the service/policy or function:

The Housing and Homelessness Strategy sets out the Council's priorities over a five year period. It focuses on four key themes which are:

- Delivering affordable homes; new supply and redevelopment of existing social housing stock
 - Addressing housing market pressures, preventing homelessness and increasing housing options: Homeless Strategy Objectives 2018-2023;
 - Ensuring good quality homes; providing choice, standards and quality for renters; and
 - Support the needs of vulnerable residents, working with care and support services to provide quality housing options.
-

Theme One: Delivering Affordable Homes; new supply and redevelopment of existing social housing stock

Objective:

- To work in partnership with PRPs, private developers and the GLA to support the development of new affordable homes
 - Deliver a range of affordable homes that meet the needs of local residents and workers
 - Maximise and make best use of financial assets and resources, both Council and PRPs, to deliver more affordable housing
-

Theme Two: Addressing Housing Market Pressure and Homelessness: Homelessness Strategy 2018-2022 Homelessness Prevention

Objectives:

- To successfully implement the Homelessness Reduction Act 2017 (HRA) from April 2018. To ensure that the new duties are bedded in across Housing Services, developing a 'whole borough partnership' approach to support making the aims of the Act a success locally, thereby preventing homelessness.
 - To work with partner agencies to shift the focus from reactive to preventative upstream homelessness prevention work.
 - To establish improved links with landlords in the private rented sector with the aim of working together to prevent homelessness and increase housing options.
-

Providing Appropriate Accommodation

Objectives

- Provide enhanced housing solutions for homeless households and those at risk of homelessness. More housing solutions for people whose homelessness cannot be prevented.
 - To improve the Council's supply of temporary accommodation by reducing expenditure in this area and reinvesting in preventative services.
 - To provide suitable accommodation that meets the needs of the households living in temporary accommodation and vulnerable groups, including rough sleepers.
-

Supporting Vulnerable Groups, including Rough Sleepers

Objectives:

- Enhance support services for homeless people and those at risk of homelessness
- Maintain and where possible enhance rough sleeper services and to reduce rough sleeping through the ongoing provision of effective outreach services which aim to move rough sleepers off the streets through the pathway model of support
- Ensure vulnerable groups have access to support to maintain their tenancy
- Keep under review protocols relating to youth homelessness.

Theme Three: Ensuring Good Quality Homes – Providing Choice, Standards and Quality for Renters

Objectives:

- To improve conditions in the private rented sector
- Implement changes to Houses in Multiple Occupation (HMO) licensing
- Implement the regulations arising from the Housing and Planning Act and publicise the new requirements to landlords so that they are aware of their responsibilities
- Continue to prioritise fire safety and take any necessary actions arising from the Independent Review of Building Regulations and Fire Safety
- To support the regeneration of Ham Close Uplift Programme
- To secure the efficient use of existing social housing stock and maximise opportunities for social housing tenants to move, downsize and address overcrowding
- Ensure the Housing needs of Gypsy & Travellers are assessed
- To improve housing management standards for residents in PRP accommodation through the work of the Tenants' Champion providing a complaints resolution service and supporting better multi agency working on complex cases.

Theme Four: Supporting the needs of vulnerable residents

Objectives:

- Support residents affected by welfare reform and prepare for the implementation of full service Universal Credit
 - Reduce fuel poverty for low income and vulnerable households
 - Deliver a programme of home adaptations to people with disabilities so that they can remain living independently
 - Support opportunities which will improve the housing offer for older people, including those with care and support needs and extra care housing
 - Support the development and implementation of mental health and learning disability accommodation pathways and supported accommodation for looked after children and care leavers as they move towards independence.
 - To ensure the Council and partner PRPs play an active role in promoting the safeguarding of children and adults from harm
-

2. ANALYSIS OF NEED AND IMPACT

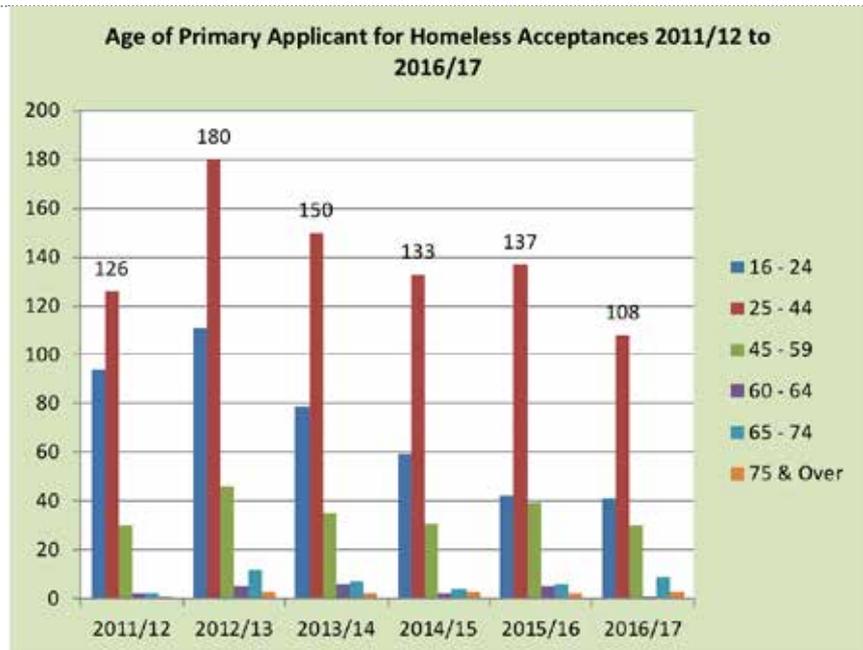
Protected group: Age

Findings

Census 2011:

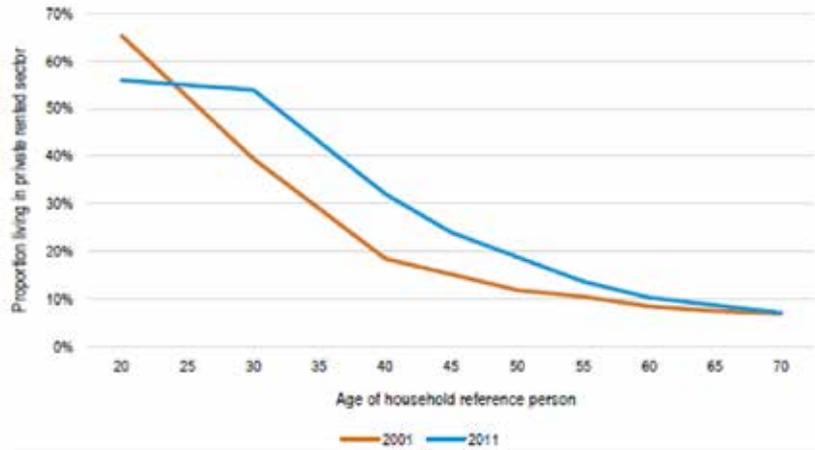
Age	Percent
0-20	24%
21-30	12%
31-40	18%
41-50	16%
51-60	11%
61+	17%

P1E Homelessness Returns:



In 2015/16, there were 108 homelessness acceptances from the 25-44 age group, accounting for 56% of those accepted as homeless which is higher than the borough demographic. The 16-24 age group, accounted for 21% of acceptances, followed by 16% in the 45-59 age group. The number and proportion of accepted cases aged 16-24 has fallen year-on-year since 2012/13.

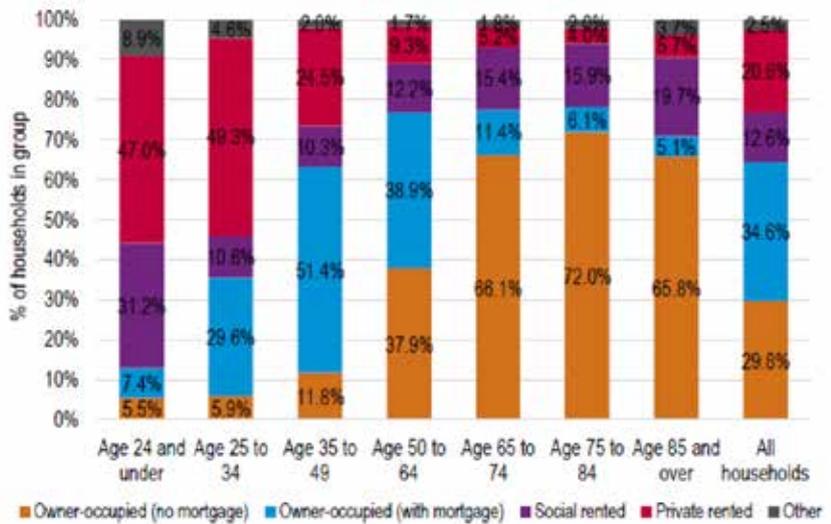
Strategic Housing Market Assessment (SHMA):



Source: Census (2001 (Table S013) and 2011 (DC4201EW))

Younger people are less likely than older residents to be owner occupiers and are more likely to live in the private rented sector or with family or friends. This, in turn, means that they are at higher risk of homelessness as the top three reasons for homelessness in 2015/16 were the ending of an AST tenancy (private sector), parents no longer willing to accommodate and other friends or relatives no longer willing to accommodate. Additionally, people are renting in the private rented sector for longer and into older age.

SHMA: Housing tenure by age range Census 2011



Age of Rough Sleepers 2016/17	Age	Richmond upon Thames 2016/17	Outer London Average 2016/17
	18-25	12%	9%
	26-35	24%	25%
	36-45	24%	30%
	46-55	31%	25%
	55+	9%	12%

Table 8, Source: CHAIN data

Rounded up or down to nearest %

The highest proportion of rough sleepers in 2016/17 were aged 46-55 age, at 31%. This is higher than the outer London average and is followed by those aged 36-45 and 26-35, each accounted for 24% of rough sleepers. Additionally, 9% of rough sleepers were aged over 55.

In relation to age, the consultation responses expressed a need for more affordable accommodation for younger people, those with young families and older people. It was highlighted that homes should be adapted so that older residents can remain in their own homes and more suitable housing options, such as sheltered housing, should be made available.

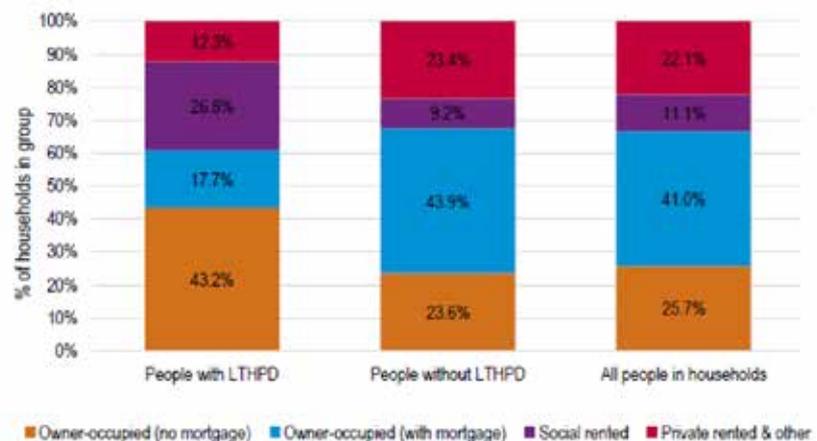
Disability

Census 2011	People Permanently Sick or Disabled (2011)	People Permanently Sick or Disabled (% of all aged 16-74 (2011))
	2,802	2.03%

The 2011 Census also identified that 11.5% of the population of the Borough indicated that they had a long-term health problem or disability that affected their day-to-day life.

SHMA: People with a Long-term Health Problem or Disability (LTHPD)

Figure 56: Tenure of people with LTHPD – Richmond-upon-Thames



People with LTHPD are significantly more likely to be an owner occupier without a mortgage or live in social housing than be an owner-occupier with a mortgage. This could be due to an older home owning demographic in Richmond whom are more likely to have long-term health problems. The higher proportion of social renters with LTHPD could be due to difficulties accessing alternative forms of affordable or accessible housing tenure

P1E Homelessness Returns:

There were 33 accepted homeless cases in 2015/16 found to be in priority need due to having a physical disability or mental health issue. They account for 17% of homeless acceptances for the year. Of these 11 were due to mental illness or disability and 22 for physical disabilities.

Homeless acceptances with a mental health issue as the main priority need reason, reduced by 67% between 2012/13 and 2016/17, from 39 to 11. Estimates of those with mental health issues within the Borough¹⁴ indicate that the proportion of accepted homeless households with mental health issues stated as priority need, was lower than the estimated 20% of the population in the borough with a mental health issue.

The consultation responses welcomed support for disabled people in the Strategy, through adaptations so that they can live independently for longer. Responses also identified that disabled people may also require support to move from inaccessible properties to accessible ones and that they were not prioritised above other groups in relation to homelessness levels.

Feedback from the consultation also wanted to see more housing options in the Borough for those with mental health issues, including crisis centres. Respondents also wanted homes to be suitably adapted for disabled residents and financial support provided to vulnerable people experiencing health issues.

Gender (sex)

Census 2011

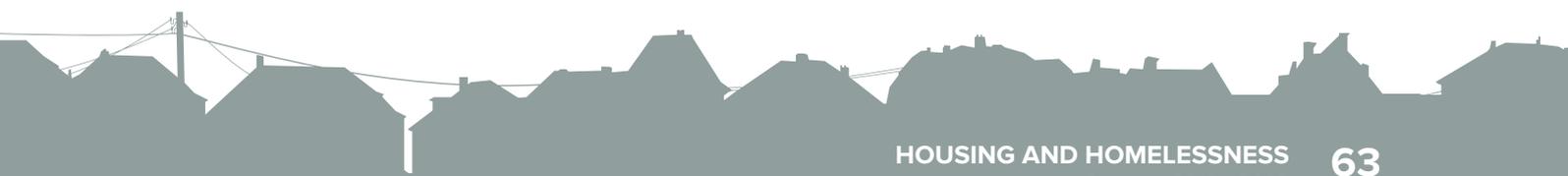
Male	Female
49% (91,149)	51% (95,849)

Single parent households

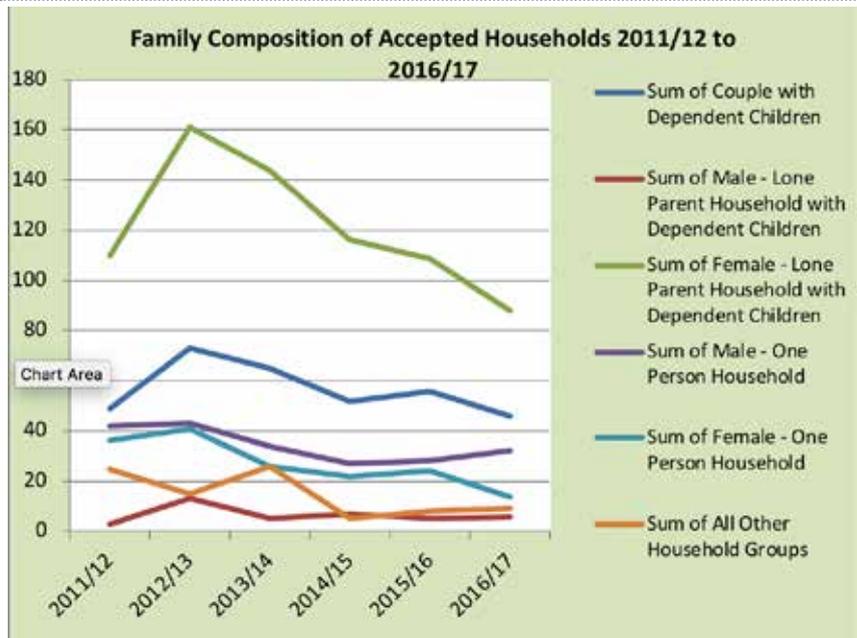
Lone Parent Households 2011 Census

Single Parent H/Hold Male	365	0.46%
Single Parent H/Hold Female	3,503	4.40%
Total Richmond Households	79,800	100%

¹⁴ www.datarich.info/resource/view?resourceId=331 Estimated 20,000 residents (2010)



P1E Homelessness Returns:



When comparing the household composition of accepted households, Richmond is similar to the London as a whole. For example, in London in Q4 2016/17, lone female parents with dependant children made up 51% of accepted homeless cases compared to 56% in Richmond. Similarly, couples with children make up the second largest group in both Richmond and in Greater London.



Among homeless households demand for two bedroom accommodation is highest, with 60% of accepted homeless applicants registered on the housing queues as at October 2017 awaiting this size of accommodation. This should be borne in mind when considering how to maintain access to the Private Rented Sector and to make best use of social stock in the Borough, for example through facilitating moves which free-up this size of accommodation. However, Richmond historically has a higher proportion of bedsit and one bedroom Registered Provider stock, meaning that the delivery of larger family sized accommodation also remains an important balancing priority. Additionally, 28% of homeless applicants require three or more bedroom homes.

Data from the P1E returns shows that women were more likely than men to be accepted as statutorily homeless. 46% of homeless acceptances in 2016/17 were from households classified as female lone parents with dependent children whilst 7% were from female one person households. In comparison, only 3% of homeless acceptances were from male lone parents with dependent children and 17% from male one person households. These findings represent a common trend where lone female parents become the primary carers for dependent children after relationship breakdowns.

Domestic Violence

Homeless acceptances from those whose primary reason for homelessness is violent relationship breakdown involving a partner range from 8% in 2010/11 rising to 12% of acceptances in 2012/13 before declining to 7% of acceptances in 2015/16. This equated to 12 acceptances in 2010/11 rising to 42 in 2012/13 and 16 in 2015/16. It is well documented that those using homelessness services due to violent relationship breakdown are predominantly female which is disproportionate to the borough profile.

Feedback from the consultation raised concerns about female rough sleepers.

Gender Identity

Joint Strategic Needs Assessment 2014

The number of people presenting to health services and Gender Identity Clinics for gender dysphoria is growing rapidly – an estimated 15-20% increase per annum. This is thought to be due to a number of factors including increased public awareness and knowledge, NHS provision of services, legislative changes, mutual support within the growing Transgender community and more respectful press coverage. Using the 2009 Gender Identity Research and Education Society (GIREs) incidence estimate and predicted growth, incidences in 2013 of presenting would be roughly 6 per 100,000 aged 15 and over per year.

Assuming uniform distribution of individuals geographically, there may be between 16 and 39 people with gender dysphoria in Richmond Borough, and the potential for 12 presentations for treatment in 2013 in those over 15 years old.

There is little information on gender reassignment amongst those using homelessness services in Richmond.

The previous review identified that collecting information on transgender residents using homelessness services was an issue and the facility is available for the collection of this data. However, the information collected is not statistically significant as a large proportion of applicants did not answer this question. The new strategy will address improving the collection of all protected characteristics groups.

Marriage and civil partnership

Marriage and Civil Partnerships in Richmond upon Thames

Status	Percentage of Population
Single	37%
Married	48%
Divorced	8%
Separated	2%
Widowed	5%

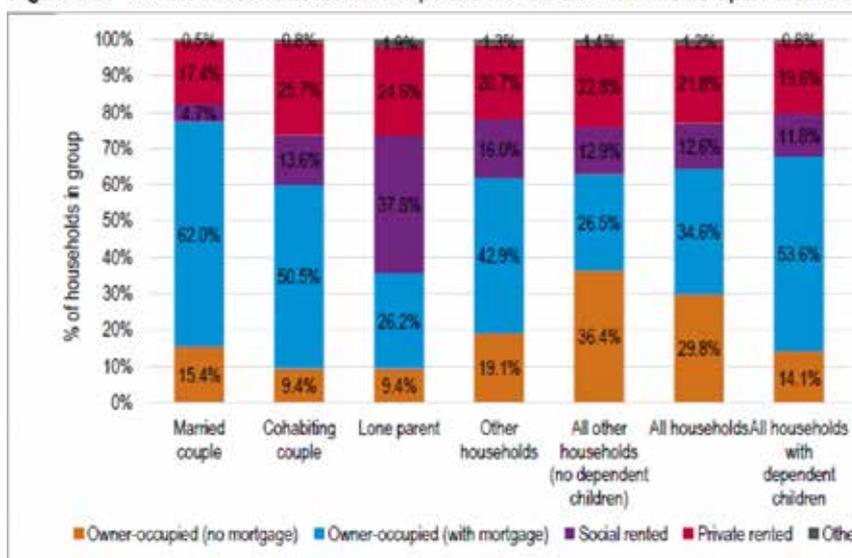
In addition to the information above, 665 residents (0.44% of those eligible) responded as being in a registered same sex civil partnership.

P1E Homelessness Returns:

The 2011 Census provides the number and percentage of residents who are married or in a Civil Partnership. According to this data, 48% of residents were married in Richmond.

24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile. Therefore, it is likely that the percentage of married and civil partnership homeless households is also lower than the borough profile as the majority of homeless acceptances are single parents with dependent children or vulnerable single person households.

Figure 60: Tenure of households with dependent children – Richmond-upon-Thames



Source: 2011 Census

In Richmond, married couples are most likely to be an owner occupier with and without a mortgage at 77.4% which is a higher proportion than the demographic of the borough. They are also less likely to live in socially rented accommodation out of all of the groups. Conversely, lone parents are less likely to own property and are most likely to live in social housing.

Pregnancy and maternity

P1E Statistics

Priority Need Category	London %	SLP+LBW %	LBRuT %
Household includes, a pregnant woman and there are no other dependent children	6%	5%	10%

ONS birth summary statistics

In 2012, there were 2,916 live births to women living in Richmond. The live birth rate was 72 per 1,000 women aged 15-44 years in the borough which is predicted to remain fairly stable over the next ten years.

P1E Homelessness Returns:

10% (23) of acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household. This is higher than 6% in London and 5% for the South London Partnership plus Wandsworth boroughs.



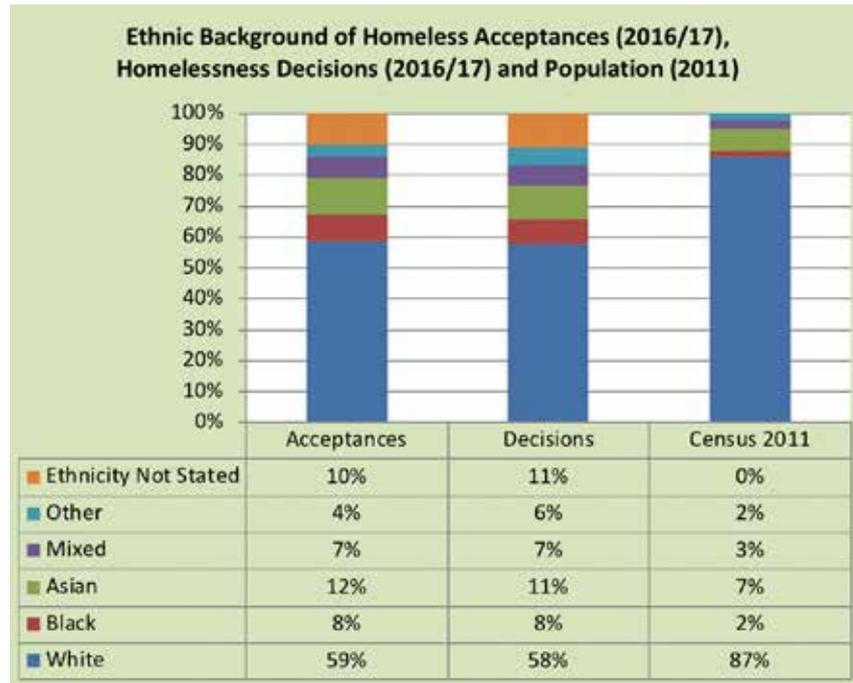
Race/ethnicity

Census 2011

	Richmond upon Thames	England	London
White	86%	86%	60%
Black	2%	3%	13%
Asian	7%	8%	18%
Mixed	4%	2%	5%
Other	2%	1%	3%

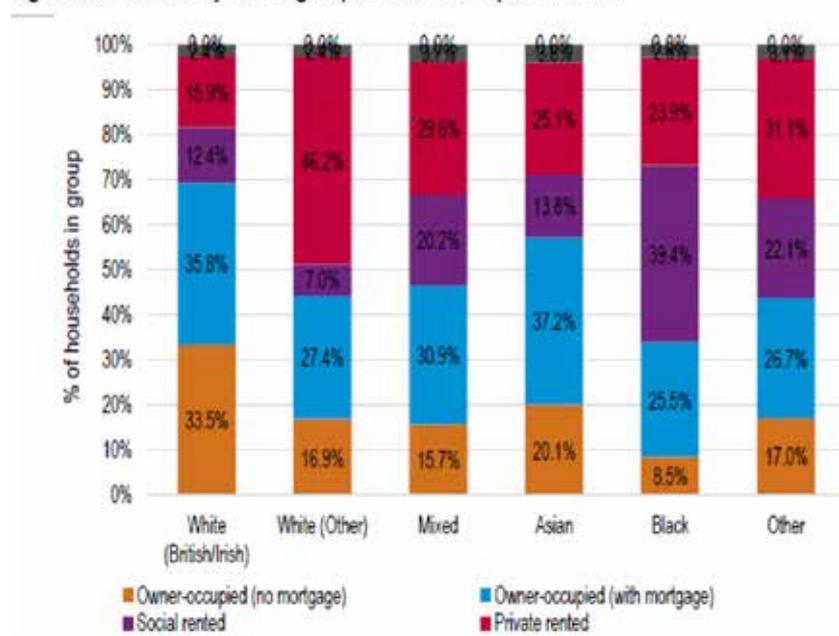
Source, P1E Returns 2015/16 and Census 2011

Census 2011:



Households from a BME background were overrepresented in the cases accepted as homeless in LBRuT with 31% of homelessness acceptances being from individuals with a BME background in 2016/17. This is also the case across London where, in 2016/17, on average 60% of all homeless acceptances were from applicants identifying as from a BME background. Black households in particular were significantly overrepresented; 2011 Census data shows that 2% of the Borough's population identifies as Black compared to 8% of homelessness decisions and 8% of acceptances made in 2016/17.

Figure 58: Tenure by ethnic group – Richmond-upon-Thames



Source: 2011 Census data (from NOMIS)

A higher proportion of those in the white British ethnic group are owner occupiers and are least likely to live in social housing. Those in the white other group rent privately than other ethnic groups. BAME groups are more likely than other ethnic groups to live in socially rented accommodation.

BAME households are also less likely to be owner occupiers and therefore more likely to be privately renting or living with friends or family.

There is a lot of research already available as to why BAME residents are over-represented in homelessness acceptances. The main issues are socio-economic such as housing affordability, larger families combined with lower homeownership levels in the borough and living in the private rented sector placing BAME families at more risk of homelessness. Research that explore these issues in more depth can be found in the Strategic Housing Market Assessment 2016 (section 10) which informed the Local Plan review which includes level of new build affordable housing and the Homelessness Review which identifies homelessness issues.

Religion and belief, including non belief

Census 2011

Religion/Belief	%
Christian	55%
Buddhist	1%
Hindu	2%
Jewish	1%
Muslim	3%
Sikh	1%
Other Religion	0%
No Religion	28%
No Religion Stated	8%

LBRuT requests information on religion and belief when service users apply for housing or use homelessness services. However, the question is not mandatory and is not reliable to measure the impact of the Strategy.

Sexual orientation

The 2011 census did not have a specific question regarding sexual orientation.

Data on sexual orientation is not reported in the P1E Returns but is collected by Richmond. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as “other”, 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as “other”¹⁵.

The data on homelessness cases in the Borough is not comprehensive. LBRuT request information on sexual orientation. However, for 69% of homelessness decisions between 2010/11 and 2015/16, sexual orientation was not recorded as the question is optional and was not completed by the user. There have been so few cases recorded, it is difficult to identify trends in the homelessness cases where a decision has been made.

National research indicates that younger LGBT people were at greater risk of homelessness whilst living in the family home as a result of their sexuality. This is because research suggests that individuals ‘coming out’ to family members can cause tension in the family and some evidence suggests this leads to this group being overrepresented amongst homelessness cases¹⁶.

In November 2017, the LGBT Forum raised the issue of young LGBT+ people being unable to access social housing as they are highly mobile within London and would struggle to meet the local connections criteria. The Strategy does not impact on housing allocation policy however this may link to homeless amongst the younger LGBT+ community

¹⁵ ONS (2015) Sexual Identity by Region, UK. Available from: www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentity-byregionuk

¹⁶ NIESR (2016) Inequality among lesbian, gay bisexual and transgender groups in the UK: a review of evidence. Available from: www.niesr.ac.uk/sites/default/files/publications/160719_REPORT_LGBT_evidence_review_NIESR_FINALPDF.pdf

Across groups i.e. older LGBT service users or BME young men

Nearly two-thirds (63%) of Asian households for which there were homelessness decisions were aged 25-44 and 24% were aged 45-59.

Decisions made on cases with those aged 60-64, 65-74 and 75 and over account for just 5% of all decisions. Only 5% of households aged 16-24 had decisions made on their cases which is considerably lower than the average for the Borough at 18% in 2015/16.

The proportion of those from each age group is largely aligned with the trend in Richmond Borough and the rest of London with those aged 25-44 (57%), 45-59 (22%) and 16-24 (18%) accounting for the majority of the cases on which decisions were made.

Of those who identified as being in from a mixed ethnic group between 2013/14 and 2015/16, there were no applicants over the age of 60, whilst 33% of decisions were for households aged 25-44 and 20% for those aged 45-59. A large proportion of decisions for the group were made on households aged 16-24 with 47% in this age range. Due to the diverse nature of this group, however, it is difficult to analyse the causes and trends with the size of the dataset. In addition, at the time data was collected for the 2011 Census, 52% of mixed ethnic group residents of Richmond Borough were under 18 years of age which will skew the data.

Data gaps.

Data gap(s)

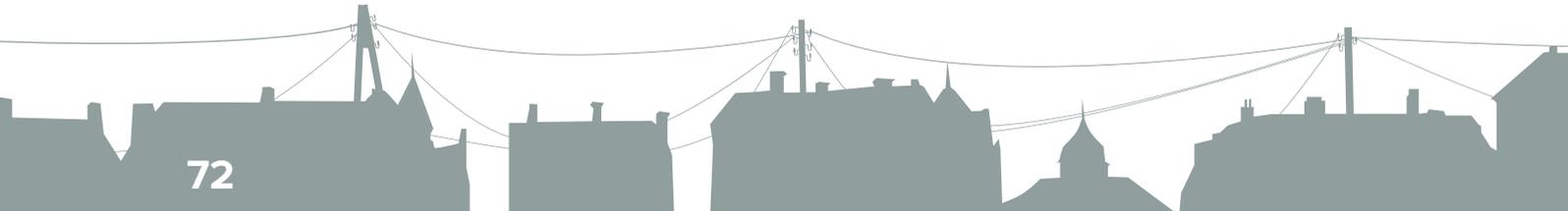
There are data gaps for the following protected characteristics the housing and homelessness strategy: sexual orientation, gender reassignment and religion and belief.

How will this be addressed?

The information on these protected characteristics is currently requested by LBRuT in relation to housing and homelessness applications. However, they are optional and service users often do not provide the information. The Council will address these gaps by improving data collection by ensuring that the equalities monitoring questions are mandatory.

3. IMAPCT

Protected group	Positive	Negative
Age	<p>The 25-44 age group are overrepresented in homelessness acceptances in Richmond compared with the borough demographic. The strategy clearly sets out measures to tackle homelessness and implement the Homelessness Reduction Act to maximum effect. This includes: securing additional resources, working with partners to improve prevention, provide alternative housing solutions and to provide suitable accommodation for rough sleepers. More resources will be secured to fulfil the new homelessness duties which will have a positive effect on younger homeless people.</p> <p>Younger people are also less likely to be owner occupiers and are more likely to rent privately. Therefore, they may find it harder to access homeownership and be at more risk of homelessness. The Council will maximise its resources and make best use of assets to deliver more affordable homes for residents on a range of incomes, including social rented, intermediate and other sub-market rent.</p> <p>Rough sleepers in Richmond in 2016/17 aged 46-55 were in a higher proportion than the Outer London average. The Council will maintain and, where possible, enhance a well developed rough sleeper service.</p> <p>The strategy sets out a range of measures which will help residents in all age groups. It aims to deliver affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents. This includes an improved housing offer for older people, including those with care and support needs.</p> <p>The Temporary Accommodation Procurement and Allocation guidelines 2018 takes into account the needs of young children in school or those taking nationally assessed examinations in particular GCSEs, who may need to stay in or close to the borough in order to cause the least disruption, when allocated temporary accommodation.</p>	



Protected group	Positive	Negative
	<p>The Local Plan sets out how the key issues facing the Borough will be delivered including around affordable housing. The Housing and Homelessness Strategy sets out in Themes one and two how it plans to address these issues.</p> <ul style="list-style-type: none"> • Theme One: Delivering affordable homes; new supply and redevelopment of existing social housing stock • Theme Two: Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023 	
Disability	<p>A higher proportion of those with a LTHPD are homeowners than other groups. However, a higher proportion also live in socially rented accommodation which could be due to difficulties accessing alternative forms of housing or accessible homes, such as the private rented sector. The strategy sets out the plan to deliver a programme of home adaptations to people with disabilities so that they can remain living independently. It also sets out its support of the development and implementation of mental health and learning disability accommodation pathways.</p>	
	<p>Homelessness acceptances from people with mental health issues as the main vulnerability reason fell by 67% between 2012/13 and 2016/17 and under the Homelessness Reduction Act, contained in the strategy, there will be enhanced duties placed on the Council for everyone who is homeless or threatened with homelessness (and eligible), regardless of priority need or intentionality.</p>	
	<p>The strategy sets out a range of measures which will help residents in all age groups to deliver affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents. This includes an improved housing offer for disabled people.</p>	
	<p>The Temporary Accommodation Procurement and Allocation guidelines 2018, takes into consideration those who receive regular inpatient or outpatient hospital appointments or receive regular care and need to stay in or as close to the borough as possible, when allocating temporary accommodation.</p>	
	<p>Theme Four sets out the Councils plan for delivering a programme of home adaptations to people with disabilities so that they can live independently. Disabled Facilities Grants (DFG) can also be used to help with relocation provided that it is reasonable and practicable. In addition, a new DFG policy will be put into place so that it can be used more flexibly to help more people with disabilities.</p>	

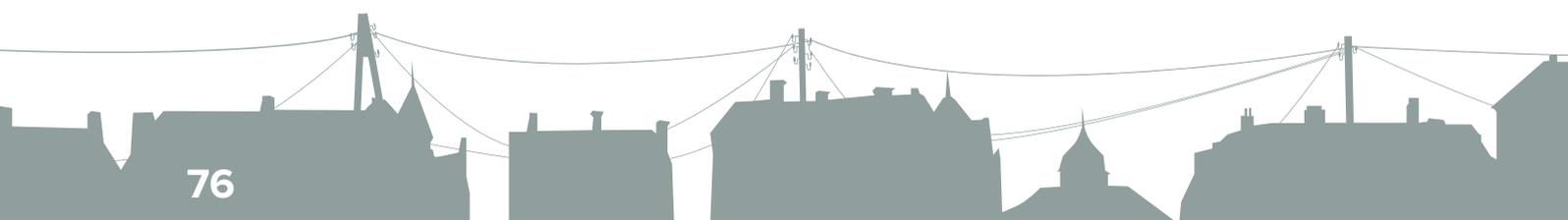


Protected group	Positive	Negative
Gender (sex)	<p>Lone female parents with dependent children made up 56% of accepted homeless cases.</p> <p>The measures in the Strategy will ensure that more homeless households are housed and there will be a greater emphasis on prevention.</p> <p>To support victims of domestic violence, which disproportionately affects females, the Council will continue to commission Refuge to operate two refuges in the borough. Additionally, SPEAR and Refuge will work jointly to provide a specialist refuge for rough sleeping women with complex needs for whom traditional refuge accommodation would not be suitable.</p> <p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents.</p>	
Gender Identity	<p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of the borough's residents.</p> <p>Consultation feedback welcomed the recognition of improving information on Gender Identity.</p>	<p>Information is limited on the transgender population in the borough in relation to housing and homelessness. The Council will improve its collection of data to ensure that better information is collected in the future, so that accurate equalities information is held to identify the impact on gender identity.</p>
Marriage and civil partnership	<p>According to the Census 2011, 48% of residents in the Borough were married where 77.4% were homeowners, with or without a mortgage. This shows that married people are more likely to be in a stable housing tenure.</p> <p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of the borough's residents.</p> <p>In 2015/16, 24% of accepted homeless households were a couple with dependent children. Therefore, it is likely that the percentage of married and civil partnerships approaching as homeless is also lower than the borough profile.</p>	

Protected group	Positive	Negative
Pregnancy and maternity	<p>10% of homelessness acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman and there were no other dependent children in the household. The increased emphasis on prevention in the Homelessness Reduction Act and other measures will help to meet the need of pregnant women.</p> <p>There is not an issue in Richmond with pregnant women or households containing dependent children being in B&B for longer than six weeks. This shows that temporary accommodation is appropriate for these households.</p> <p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people.</p>	
Race/ethnicity	<p>Households from a BAME background were overrepresented in accepted homeless cases at 31%, despite only representing 15% of the borough population, according to the 2011 Census. In addition, BAME households are also less likely to be owner occupiers and are more likely to be privately renting or living with friends or family. This could be due to difficulties accessing affordable housing and places them at increased risk of homelessness due to tenure security.</p>	
	<p>Black ethnic group households were significantly overrepresented in the proportion of acceptances. 2% of the Borough's residents identify themselves as black but formed 8% of acceptances in 2015/16.</p> <p>The percentage of households accepted as homeless in 2015/16 that identify as Asian, were slightly overrepresented at 10% compared with the borough profile of 7%. Nearly two-thirds (63%) of Asian households for which there were homelessness decisions were aged 25-44 and 24% were aged 45-59.</p> <p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. These measures will have a positive impact on those in the BAME ethnic groups.</p>	



Protected group	Positive	Negative
	<p>The Local Plan sets out how the key issues facing the Borough will be delivered including around affordable housing. The Housing and Homelessness Strategy sets out in Themes one and two how it plans to address these issues.</p> <ul style="list-style-type: none"> • Theme One: Delivering affordable homes; new supply and redevelopment of existing social housing stock • Theme Two: Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023 	
Religion and belief, including non belief	<p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. The measures will have a positive impact for people of any religion and belief.</p> <p>Consultation feedback welcomed the recognition of improving information on Religion and Belief.</p>	Information is limited on religion and belief in relation to housing and homelessness. The Council will improve the collection of data to ensure that better information is collected to accurate the impact on those with this protected characteristic.
Sexual orientation	<p>National research indicates that younger LGBT people were at greater risk of homelessness whilst living in the family home as a result of their sexuality. The Strategy sets out how LBRuT will provide increased support to prevent and relieve homelessness which will help younger LGBT+ people.</p> <p>The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. The measures will have a positive impact for people of any sexual orientation.</p>	Information is limited on sexual orientation in relation to housing and homelessness. The Council will improve the collection of data to ensure that better information is collected to accurate the impact on those with this protected characteristic.



4. ACTIONS

Action	Deadline
Measure the impact of changes to homelessness across the protected characteristics.	Each year
Ensure that information is collected for homelessness applications when the new online form comes into effect and in time for the Homelessness Reduction Act	December 2017

5. CONSULTATION. (OPTIONAL SECTION– AS APPROPRIATE)

Where a significant change is proposed to a service or where a new policy/service/service specification is being developed it is best practice to consult on the draft findings of an ENIA in order to identify if any impact or need has been missed)

This EINA was subject to a public consultation alongside the Housing and Homeless Strategy and the Homelessness Review.

There were 64 responses to the consultation. When the feedback was analysed there was no difference in response from a particular group which was statistically reliable, however themes that came out of the consultation have been added to the updated EINA and flagged as an addition.

The EINA was subject to scrutiny by the Equality Scrutiny Stakeholder Group (ESSG). Their feedback and changes made as a result are set out below.

Feedback from the ESSG	Response
We welcome the inclusion in the strategy for supporting disabled people by adjusting their properties to make them more accessible. Also needed is a programme for supporting people to move from inaccessible properties to a more accessible one – e.g. people with severe mobility issues in a third floor flat with no lift etc. They need help and support with moving.	<p>This has been addressed via Theme 4 which states:</p> <p>Deliver a programme of home adaptations to people with disabilities so that they can remain living independently.</p> <p>The Council is committed to assisting older and disabled people to remain living independently in their own home. The Home Improvement Agency (HIA) will continue to work closely with the Occupational Therapy Service to provide adaptations in the home for residents who have mobility issues or need adaptations due to old age. The HIA has sufficient grants in place over £7m from 2017-18 to 2022-23 to provide Disabilities Facilities Grants (DFGs). DFGs are used to help people requiring adaptations to their homes and on average allow residents to live independently for an additional five years. The Council has delivered 121 DFGs per year since the previous strategy Sufficient budget is in place to meet demands and the Council is recruiting additional staff to increase capacity.</p>

People with long term health conditions and disabilities including mental health seem not to be prioritised above other groups. DCLG figures from 2010 to 2016 show that the overall number of households accepted as being homeless by local authorities in England went up from 42,390 to almost 60,000. This increase was disproportionately high for homeless households classed as vulnerable through mental illness, where homelessness went up 53%, and for those classed as vulnerable through physical disability, where it rose 49%. This leads us to query the statement in the EINA that 'Homelessness acceptances with mental health as the main vulnerability fell by 67% between 2012/13 and 2016/17, from 39 to 11' and to wonder if this is more likely due to the changes in housing policy?

The Directorate were unclear on the source (s) used but notes that the main change to Homelessness Housing Policy is the ability to discharge homelessness accepted cases into the private sector. If someone has mental health issues or a long term disability they are more likely to be in priority need as they could be deemed 'more vulnerable than an ordinary person' should they find themselves homeless.

Overall homelessness is relatively low compared with other London Boroughs and the vast majority of accepted cases are those for households whom have dependent children in the household. The main reason for homelessness is through the loss of private rented accommodation with landlords using the S.21 (no fault) notice.

Following a sharp decline in number of acceptances due to a mental health problem in 2013/14, the number rose slightly before falling again in 2016/17. Of the 231 accepted homeless cases during 2015/16, 22 were in priority need due to a mental health problem which represented 9.5% of the overall caseload and was the third most common reason. It is positive to note therefore that this figure declined sharply in 2016/17 with only 11 (6%) acceptances due to a mental health problem.

This has been addressed under themes one, two and three.

- Theme One: Delivering affordable homes; new supply and redevelopment of existing social housing stock
- The Council will explore and encourage innovative ways of meeting the varied aspirations and accommodation needs of older people as well as other client groups such as people with dementia, mental health problems or learning disabilities.
- Theme Two: Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2018-2023

Under the Homelessness Reduction Act, outlined in theme two of the Strategy, there will be enhanced duties placed on the Council for everyone who is homeless or threatened with homelessness (and eligible), regardless of priority need or intentionality. The Council is also committed to working with rough sleepers, where 95% of households in SPEAR accommodation have mental health needs. The Council will maintain and where possible enhance rough sleeper services to reduce rough sleeping through the ongoing provision of effective outreach services.

- Theme Four: Supporting the needs of vulnerable residents, working with care and support services to provide quality housing options.

The Council plans to support the development and implementation of mental health and learning disability accommodation pathways and supported accommodation for looked after children and care leavers as they move towards independence. Additionally, the Council plans to provide move on accommodation from temporary supported housing to ensure its continued effective use.

We welcome the recognition of the importance of getting more and better information on gender identity and religion and belief in particular, and look forward to having more information to look at. We trust that officers are seeking and sharing information with other boroughs to help with this. We are happy to help with ideas on how to improve the response rate on monitoring if needed.

Noted and welcomed

We raised some concerns in the past (I think) about women rough sleepers and I couldn't find a reference in the strategy or the EINA.

This has been addressed via Theme 2 which states:
To provide suitable accommodation that meets the needs of the households living in temporary accommodation and vulnerable groups, including rough sleepers.

For female rough sleepers who have been victims of domestic abuse the Council, Refuge and SPEAR will work jointly to provide a specialist refuge for women with particularly complex needs for whom traditional refuge accommodation would not be suitable. This is funded until April 2018 and the Council is committed to working with its partners to seek further funding to retain this provision.

Given BME households are over-represented in cases accepted as homeless with Black households particularly over-represented, it might be useful to look at this issue in more depth. Assuming some of the cause is socio-economic status, but are there other factors, and does the borough provide the type of housing such households need etc.

The Directorate welcomes this insight and comment and will use the comprehensive data it collects to monitor the impact of the Strategy. The Directorate notes that there is a lot of research already available as to why BAME residents are over-represented in homelessness acceptances. The main issues are socio-economic such as housing affordability, larger families combined with lower homeownership levels in the borough and living in the private rented sector placing BAME families at more risk of homelessness. Research that explore these issues in more depth can be found in the Strategic Housing Market Assessment 2016 (section 10) which informed the Local Plan review which includes level of new build affordable housing and the Homelessness Review which identifies homelessness issues. Both these plans feed into the development of the Strategy.



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