



Richmond Housing and Homelessness Strategy

2021 – 2026

Glossary

AFC	Achieving for Children	HIA	Home Improvement Agency	MHCLG	Ministry of Housing, Communities and Local Government
ASB	Anti-Social Behaviour	HFLAHP	Homes for Londoners Affordable Homes Programme	PRP	Private Registered Providers
CCG	Clinical Commissioning Group	HMO	Houses in Multiple Occupation	RHP	Richmond Housing Partnership
DAHA	Domestic Abuse Housing Alliance	HRA	Homelessness Reduction Act 2017	RSP	Regulatory Services Partnership
DDA	Development Delivery Agreement	JCP	Job Centre Plus	RTB	Right to Buy
DFG	Disabled Facilities Grant	LA	Local Authority	SHGP	Social Housing Green Paper
DHP	Discretionary Housing Payments	LBRUT	London Borough of Richmond upon Thames	SHMA	Strategic Housing Market Assessment
GLA	Greater London Authority	LHA	Local Housing Allowance	UC	Universal Credit
HHSRS	Housing, Health and Safety Rating System				

See back cover for additional glossary terms.

Table of Contents

Glossary	2	THEME ONE:	
Foreword	4	Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness and Rough Sleeping Strategy 2021 - 2026	12
Introduction	6	THEME TWO:	
Key Achievements	11	Delivering affordable homes; new supply and redevelopment of existing social housing stock	24
		THEME THREE:	
		Ensuring good quality homes; providing choice, standards and quality for renters	32
		THEME FOUR:	
		Supporting the needs of residents, working with care and support services to provide quality housing options	38

Foreword



Councillor Jaeger, Deputy Leader and Vice-Chair of Adult Social Services, Health and Housing Committee

Richmond Council was in the process of reviewing and refreshing its Housing and Homelessness Strategy when the Covid-19 emergency impacted in March 2020. Whilst this paused our progress in undertaking this review, what has struck me is how our key aims and objectives are more relevant than ever, with lockdown highlighting the need to focus our efforts to better meet the housing needs of Richmond residents. This Strategy is our opportunity to make firm commitments to build on the gains and approaches developed during lockdown to better serve our residents and communities.

Decent housing is fundamental to supporting the health and wellbeing of residents, building vibrant communities and supporting the local economy. We understand the challenges faced by Londoners when it comes to securing a good quality and affordable home. As the most expensive outer London borough to buy and rent, and with relatively few social homes, residents of the London Borough of Richmond upon Thames (LBRuT) face particular challenges.

The coronavirus pandemic has put these challenges into sharper focus and, whilst the principles underpinning the Strategy have not changed, certain actions have been accelerated as the Council worked to protect the most vulnerable in our communities, including rough sleepers and our older residents.

Building on our strong track record in tackling homelessness the Council successfully implemented the Homelessness Reduction Act 2017, embracing the opportunity to improve services with a shift of focus to early intervention and homelessness prevention. Tackling rough sleeping has been a longstanding priority for the Council and the coronavirus pandemic provided the impetus and – crucially – Government funding to work rapidly to assist the Borough’s rough sleepers into accommodation. The Council has committed to doing all it can, through its Covid-19 recovery plan, to prevent rough sleepers returning to the streets by working with partners to explore all available options for an offer of accommodation and providing a support package which meets the full range of rough sleepers’ needs.

Around 900 new homes are needed every year until 2033 to meet local demand. I and the Liberal Democrat administration are determined that many more of these homes are affordable housing which better reflect our planning policy objectives and requirements. We know we

need to intervene so that, as well as using our own land to build, we will work with local private registered providers (PRPs), landowners and private developers, taking innovative and flexible approaches to deliver more housing across a range of tenures to meet the needs of local people.

More and more people in the Borough are renting privately and we will continue to work with private sector landlords to ensure housing is of a good standard and tenants are given a fair deal, taking robust action against rogue landlords where necessary. We have committed resources to working proactively to bring longer term empty properties back into use as affordable housing, a new initiative which has far-reaching benefits.

We are committed to supporting the needs of vulnerable residents and the Strategy sets out how we will work with partners to ensure that appropriate support is in place so that people can access suitable housing. In recognition of the changing national and boroughwide demographics

we have set out our strategy for meeting the needs of older residents, ensuring they are supported to remain independent and, as their needs change, have access to suitable housing and support.

In 2020 we celebrated the 125th anniversary of the development of Manor Grove in North Sheen, London’s first council housing. We’re hugely proud that this pioneering social reform happened in our Borough. I know that we too have a responsibility to do all we can through effective partnership working, maximising available resources and taking an innovative and ambitious approach to improve the housing options for all Borough residents, now and in the future.

Councillor Liz Jaeger

Deputy Leader and Vice-Chair of Adult Social Services, Health and Housing Committee

Introduction

The London Borough of Richmond upon Thames' (LBRuT) Housing and Homelessness Strategy sets out the Borough's plans for housing and homelessness services for 2021 – 2026. The previous Strategy covered 2018 – 2023; this has been refreshed now to ensure that the Council's housing objectives reflect current challenges and respond to significant developments in the sector including new legislation. The Strategy focuses on four key themes, each of which play an integral part in providing good quality, affordable housing:

- Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness and Rough Sleeping Strategy 2021-2026;
- Delivering affordable homes; new supply and redevelopment of existing social housing stock;
- Ensuring good quality homes; providing choice, standards and quality for renters;
- Supporting the needs of residents, working with care and support services to provide quality housing options.

The Housing and Homelessness Strategy sits under the Borough's [Corporate Plan](#) and complements other strategic plans, such as the [Local Plan](#), [Community Safety Plan](#) and [Children and Young People's Plan](#)¹. The Council has declared a climate emergency and published the [Climate Change and Sustainability Strategy 2019 – 2024](#) and [Air Quality Action](#)

[Plan 2019 – 2024](#). The Strategy builds on existing strategic housing documents including the [Tenancy Strategy 2019](#) and the [Intermediate Housing Policy Statement 2017](#). It also fulfils the five-yearly requirement to produce a Homelessness Strategy and Rough Sleeping Strategy. 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](#).

The Strategy has been developed in consultation with stakeholders including residents and local voluntary sector partners during a four-week consultation period.

National Context

Since the Council's previous Housing and Homelessness Strategies the housing landscape has changed both locally and

nationally. The Government has introduced new legislation to encourage house building, tackle rogue landlords and increase local authorities' (LAs') duties to homeless people and those threatened with homelessness. There has been a renewed emphasis on listening to social tenants and ensuring that they are at the heart of decisions about their housing. Of course, the coronavirus pandemic has also had a significant impact on all areas of life, including housing.

The [Homelessness Reduction Act 2017](#) came into force in April 2018, amending the Housing Act 1996, to place new duties on LAs to prevent and relieve homelessness. The Act places a greater emphasis on councils intervening earlier to prevent homelessness before it occurs. The Act also strengthens the provisions for households not in priority need, with LAs obliged to develop personalised housing plans with all clients who are

¹ The current Children and Young People's Plan covers the period 2017 – 2020 and will soon be refreshed



eligible and threatened with homelessness. A further duty came into effect in October 2018, placing a statutory duty on specified public bodies to refer service users who they believe to be homeless or threatened with homelessness to the local housing authority.

The Council is closely following the progress of the Domestic Abuse Bill, which is currently going through Parliament at the time of writing. The Bill will create a statutory definition of domestic abuse, emphasising that this includes emotional, coercive or controlling, and economic abuse, as well as physical abuse. The Bill will place a duty on LAs to provide

support to victims of domestic abuse and their children in refuges and other safe accommodation. The Bill will also provide that all eligible homeless victims of domestic abuse automatically have priority need for homelessness assistance, without vulnerability as a result of the abuse having to be demonstrated.

Released in August 2018, the [Social Housing Green Paper](#) (SHGP) aims to rebalance the relationship between residents and landlords and ensure residents' views are central to decision-making, tackle stigma associated with social housing and ensure that it can be both a stable base that supports

people when they need it as well as enabling social mobility. It also reiterates the Government's continued focus on increasing supply of homes and proposes a review of the Decent Homes Standard.

On 20th July 2020 the Government published the Fire Safety Consultation. This consultation sets out how the Government proposes to implement the recommendations in the [Grenfell Tower Inquiry Reports, Phase 1](#) report by strengthening the [Regulatory Reform \(Fire Safety\) Order 2005](#) and implementing the [Fire Safety Bill 2019 - 2021](#). The Government also published the [Draft Building Safety Bill](#) following on from Dame Judith Hackitt's [Independent Review of Building Regulations and Fire Safety](#). These changes, set out in the Draft Bill, propose a new regime of accountability, making it clear where the responsibility for managing safety risk lies throughout the design, construction and occupation of buildings in scope (of 18 metres or more than six storeys). The Council has included private sector housing in fire safety events to promote the upcoming changes in legislation around fire and building safety and will continue to work with local PRPs to ensure the proposals in the new Bills are understood and implemented and that residents' voices are heard.

Building on the [Welfare Reform Act 2012](#), the [Welfare Reform](#)



and [Work Act 2016](#) introduced further changes to welfare benefits including reducing the Benefit Cap from a maximum possible amount of £26,000 per year to £23,000, a four-year benefits freeze and restrictions on benefits for households with more than two children.

The [Housing and Planning Act 2016](#) introduced a number of policy changes including measures to tackle rogue landlords in the private rented sector and regulations to streamline planning policies to increase the delivery of homes.

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. The Government has since built on this Paper by making several announcements to put councils at the forefront of developing housing to help meet local demand.

The [Licensing of Houses in Multiple Occupation \(Prescribed Description\) \(England\) Order 2018](#) extends the scope of mandatory licensing of HMOs to include all those housing five or more unrelated people,

regardless of the number of storeys. A second statutory instrument, the [Licensing of Houses in Multiple Occupation \(Mandatory Conditions of Licences\) \(England\) Regulations 2018](#) introduces new conditions that must be included in licences: mandatory minimum sleeping room sizes and waste disposal provision requirements.

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 2018](#) sets out the Mayor's plan for addressing London's



Local Context

Adopted in July 2018, the Council's [Local Plan](#) outlines how the Council will protect local character by enhancing and maintaining different 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, 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. The Housing and Homelessness Strategy can provide flexibility when considering proposed developments, for example to support exceptions to planning policy where a development will provide a significant proportion of affordable housing. The Local Plan affordable housing policy requirements expect that proposed affordable housing should reflect the Council's guidance on tenure and affordability. The Council's Housing and Homelessness Strategy, Tenancy Strategy and the Intermediate Housing Policy should be referenced when planning applications are being considered. Additionally, when approval is given the Council's requirements in relation to affordability and other matters as set out in these documents will inform relevant clauses and schedules in Section 106 agreements.

housing crisis around five key themes:

- 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 Government grants to support new house building targets with the aim of 90,000 affordable homes to start

on site by 2021, and improving conditions in the private sector.

In 2018 the Mayor published a draft [London Plan](#), the final version of which is due to be published in 2020, which proposes increased housing delivery targets in London. The target for LBRuT for homes of all tenures to be delivered between 2020 and 2030 is 4,110. In terms of affordable housing delivery, the London Plan sets out a strategic target of 50% of all homes delivered across London to be affordable.



The Council in its strategic housing role is keen to guide PRPs to meet local housing needs and priorities, as outlined in the [Tenancy Strategy 2019](#). This directs PRPs operating in the Borough to offer fixed term tenancies of at least ten years to ensure social housing residents have a reasonable degree of security whilst also allowing PRPs to make best use of stock. In addition, secure tenancy rights of existing social tenants should be protected so as not to discourage downsizing, mutual exchanges or cross-borough mobility schemes. The Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

In addition, PRPs are expected to have special regard to the service charges imposed on residents of low-income households, ensuring that these charges are affordable when considered alongside the weekly rent amount.

The Council has declared a climate emergency and published the [Climate Change and Sustainability Strategy 2019 – 2024](#) and [Air Quality Action Plan 2019 – 2024](#). The Climate Change and Sustainability Strategy sets out five main areas of focus, ensuring the Council complies with current legislation, has a framework to set robust targets, has identified key actions that need to be delivered and has the resources in place to achieve these actions. As part of this,

the Richmond Climate Charter will be drawn up which partners, including local PRPs, will be expected to sign up to. This will actively encourage members to conduct their activities in an environmentally, socially and economically responsible manner.

The [Localism Act 2011](#) enabled local authorities to devise allocations policies appropriate to the local area. The [Council's Housing Allocations Scheme 2018](#) aims to ensure that the Council and its PRP partners work together to make the best use of available social housing stock.

Key Achievements

- Since the enactment of the Homelessness Reduction Act 2017, prevention of homelessness for 215 households throughout 2018/19 and 2019/20 by facilitating moves to alternative accommodation or assisting them to remain in current suitable accommodation.
- Working rapidly with partners to provide accommodation for more than 80 rough sleepers during the coronavirus pandemic. Developing a rough sleeper Covid-19 recovery plan which sets out the Council's commitment to explore all available options regarding an offer of accommodation and to ensure the full range of support is in place to help people remain off the streets.
- Maintaining over half (64%) of all temporary accommodation placements in 2019/20 within LBRuT or a neighbouring borough despite increased demands on the service.
- A significant decrease in the number of 16- and 17- year olds presenting and being accepted as homeless, from 39 in 2010/11 to ten in 2018/19 and one in 2019/20.
- Collaboration with SPEAR and other partners to secure funding to enhance rough sleeper services. Over 500 homeless people a year are assisted by SPEAR through a combination of outreach services, accommodation offers and additional support.
- Rethinking how grant is used and developing a framework to enable more new home starts in the future, with a potential pipeline of 1,000 starts over the next three years.
- An overall increase of supported housing of 52 units, for people with mental health and learning disability support needs. This includes self-contained and shared accommodation within both specialist supported housing and general needs housing schemes.
- Signing the first Development Delivery Agreement with Richmond Housing Partnership (RHP) with the parties committing £5m to support the delivery of up to 180 affordable homes over the next five years².
- Increasing the number of licenced HMOs from 40, prior to new 2018 regulations, to 111, all of which have been subject to thorough inspections by the Council to ensure they provide tenants with a good standard of housing.
- Supporting RHP to complete 25 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.
- Successfully bidding for over £500k of Green Homes Grant funding to be used to improve the energy efficiency of privately owned and rented homes in the Borough.
- Supporting 540 vulnerable households through the Resettlement Service between 2014 and 2020.
- Providing 542 Disabled Facilities Grants (DFGs) between 2014/15 and 2018/19 helping vulnerable residents to remain in their homes for on average five years longer than without such adaptations.

² The target number of additional affordable homes to be achieved through the DDA over the next five years is currently in the process of being formally agreed so is subject to change.



THEME ONE:

Addressing housing market pressures,
preventing homelessness and increasing
housing options: Homelessness and
Rough Sleeping Strategy 2021 - 2026



Homelessness in the London Borough of Richmond upon Thames

The enactment of the Homelessness Reduction Act 2017 (HRA 2017) on 3rd April 2018, which fundamentally changed homelessness duties, means that comparisons with previous years is not always appropriate however overall trends can still be observed. Under the HRA 2017, all contacts must be recorded which accounts for a significant rise in homelessness approaches, from 389 in 2017/18 to 1,002 and 968 in 2018/19 and 2019/20 respectively. However, the number of acceptances has continued to fall over recent years, from 108 in 2018/19 to 80 in 2019/20.

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 April 2020 there were 4,100 households on the housing register which is a slight decrease from 4,412 on 1st April 2019.

The most common reason for homelessness in 2019/20 was exclusion by family and friends, accounting for 25% of all accepted cases. The trend seen over recent years of increased homelessness arising from the private rented sector continued, albeit at a reduced rate, and was the other main reason for homelessness, being the cause in 19% of cases. The trend of high levels of homelessness

The Homelessness Act 2002 introduced the requirement for LAs to formulate and publish a Homelessness Strategy every five years, based on an assessment of the nature and extent of homelessness locally. The Ministry of Housing, Communities and Local Government (MHCLG) published its Rough Sleeping Strategy in August 2018. As part of several steps outlined to tackle rough sleeping, this stipulated that all LAs must include a specific rough sleeping element within their Homelessness Strategies. Current trends in homelessness and service activity are also formally reported to the Council at least annually.

The Coronavirus Act 2020 introduced measures to ensure no-one loses their home as a result of the pandemic by suspending all current eviction

proceedings and blocking new applications for possession as well as introducing a six-month notice period for the majority of possession claims. It is anticipated however that, with the pause on evictions now having ended, homelessness may increase particularly if steps are not taken to bolster the homeless prevention response across the piece including through the provision of a functioning and timely Universal Credit (UC) system.

This chapter sets out how the Council will work to prevent and relieve homelessness and to provide support to people who are homeless, including rough sleepers, or those at risk of becoming homeless.

arising from a loss of private rented accommodation is echoed regionally, sub-regionally and nationally.

Most accepted homeless applicants are aged between 25 and 44, with the highest proportion being females as the lead applicant with children.

Over half of homelessness acceptances in the Borough were deemed to be in priority need because the household included at least one dependent child during 2019/20. Priority need because of vulnerability due to mental ill health was the second most common category in 2019/20, accounting

for 21% of accepted cases. This may not provide a true picture of additional vulnerabilities however; dependent children may be recorded as the reason for priority need in situations where there are other contributing factors.

Homelessness Prevention

OUR OBJECTIVES ARE TO:

Continue to successfully embed the HRA 2017, developing a 'whole borough partnership' approach to make the aims of the Act a success locally

Significantly increase homeless prevention interventions

Develop improved links with landlords in the private rented sector with the aim of working together to prevent homelessness and increase housing options

Provide alternative housing options, including in the private rented sector, where homelessness cannot be prevented

Why is this important?

The HRA 2017 includes a strengthened duty on LAs 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 intervene, at an earlier point to prevent homelessness for all households, regardless of any longer-term statutory duty that may subsequently be accepted. Single people who may not be owed the full rehousing duty are now 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 has utilised this opportunity to shift the focus to effective homelessness prevention, working with households to remain in their home where appropriate.

During 2019/20 the Council was successful in preventing homelessness for 60 households by securing suitable affordable accommodation or supporting them to remain in their current home through negotiation with landlords, agreeing repayment plans to mitigate rent arrears and referrals for specialist debt management advice.

47 households were assisted into privately rented accommodation. The service will build on these successes to achieve more preventions in future years, meeting people's desires to remain in or move into suitable affordable accommodation.

The HRA 2017 places additional, ambitious and time intensive duties upon the Council, including the requirement to create a personalised housing plan for those who are eligible and at risk of homelessness, regardless of priority need. The Department has experienced a significant increase in workload as the service developed its new approach to providing an



effective housing solutions service to a wider group of clients. The use of the service has exceeded forecasts, indicating the latent demand for housing advice and support in the Borough and across London. The Council has increased staffing levels and sought additional financial resources to ensure it is best placed to maximise the opportunities provided by the HRA 2017 to prevent and relieve homelessness wherever possible.

Partnership working with statutory and voluntary sector partners is essential and is reinforced by the Act which introduced a new duty on public bodies to refer clients to LAs where they are threatened with homelessness or are homeless. The Borough's Homelessness Forum, which brings together professionals from across the statutory and voluntary sectors, provides an opportunity to strengthen links with partners and work together to achieve a robust, comprehensive approach to tackling homelessness and related issues.

The changing reasons for homelessness mean that it is becoming increasingly difficult to

prevent a household from losing their accommodation. Welfare reforms including the LHA caps and freeze, the Benefit Cap and UC have led to many private landlords withdrawing from the lettings market for those on lower incomes. This may be further exacerbated by the proposed abolishment of section 21 notices and the uncertainty that this brings to the sector. Although a positive change, given that termination of an assured shorthold tenancy accounts for 19% of all accepted cases, this does have the potential to result in further retraction of this market for those reliant on benefits. Improved links with local landlords is vital therefore in securing and maintaining accommodation and the Council is committed to continuing to facilitate the regular landlord forum to keep landlords informed of legislation changes, local developments and the incentives offered by the Council for working together to prevent homelessness.

We will:

- Focus efforts on prevention of homelessness, maximising access to the local private rented sector where

appropriate and enabling people to stay in their current home where this is suitable.

- Review all resources to consider how best to target these in light of increased homelessness approaches and significant workload pressures. This will include the Council providing additional resources to improve its capacity to prevent homelessness with recruitment to additional posts taking place in 2020/21.
- Continue to explore how data analytics can be used to establish indicators of risk and key transition points and work with the community to take effective early intervention, preventing homelessness early.
- Provide mediation where appropriate to prevent parental evictions and those from the private rented sector.
- Continue to offer a generous package of incentives to local private landlords who work with the Council to provide accommodation for households facing homelessness. Promote these through the Landlord Forum.
- Explore the option of utilising an external legal service to assist private tenants at risk of illegal eviction.
- Via the Landlord Forum, educate landlords on their duties under the Equalities Act 2010, particularly the fact it is unlawful to refuse to let to households in receipt of welfare benefits.

Providing Appropriate Accommodation

OUR OBJECTIVES ARE TO:

Provide enhanced housing options for homeless households and those at risk of homelessness

Minimise the use of nightly paid 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?

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. Following a 17% reduction in use of temporary accommodation between 2017/18 and 2018/19, 2019/20 saw an increase which is forecast to continue in 2020/21 due to the impact of the coronavirus pandemic on the economy leading to more homeless applications, acceptances and placements.

The Council has been successful in maintaining over half of placements within the Borough or in neighbouring boroughs with the remaining in other areas of London. This has the effect of maintaining households' existing social, education and employment links and support networks. However, this has also led to high costs associated with temporary accommodation.

Sourcing in-borough accommodation has become more problematical as the total number of placements by London boroughs collectively has increased. As such, the Temporary Accommodation Procurement and Placement Guidelines have been adopted as part of this strategy for use, if accommodation cannot be sourced within the Borough. These guidelines are attached as Appendix 1 to this Strategy.

The Council currently operates two hostels in the Borough providing a total of 50 bed spaces. The Council will review the suitability of the hostel spaces and whether they provide accommodation which meets the needs of those being housed temporarily by the Council. It is recognised that the Council does not operate in isolation when seeking temporary accommodation but rather works within a marketplace shaped by wider economic factors and by procurement activity undertaken by other London boroughs. The Council participates in joint

working across these boroughs, especially within south west London.

The Council is committed to ensuring adequate provision of refuge space in the Borough through commissioning of providers. Currently there are two refuges in the Borough, providing a total of 15 units, offering person-centred support and stays of up to two years. Female rough sleepers who have been victims of domestic abuse can access the Borough's specialist refuge for women with particularly complex needs for whom traditional refuge accommodation would not be suitable. The Council is also in the process of achieving Domestic Abuse Housing Alliance (DAHA) accreditation, which recognises best practice when dealing with domestic abuse.

Facilitating moves to emergency and settled accommodation can be especially challenging for people with no recourse to public funds and the Council recognises the important work



that the charity Glass Door do locally in providing night shelter accommodation for this group to access. The Council is committed to continued partnership working with Glass Door and other relevant agencies including the Vineyard to explore how their work can complement that done by the Council and its partners in securing settled accommodation for homeless people.

We will:

- Continue to facilitate moves into suitable private rented accommodation in LBRuT and surrounding boroughs.
- Look to increase the supply of self-contained accommodation through leasing, reducing the service's reliance on expensive nightly-paid temporary accommodation. A greater focus on securing appropriate private sector leased accommodation is possible because of the expansion of the Temporary Accommodation team.
- Work with SPEAR and other partners to ensure refuges and hostels meet the needs of homeless households in the Borough, in terms of available bed spaces and type of accommodation. Consider improvements to the Council's existing hostel stock.
- Ensure the housing needs of vulnerable groups are considered in the annual allocation and resources plan, agreeing with partners levels of accommodation needed to support their client groups and ensuring there is adequate provision for move-on.
- Maintain and strengthen links with partners operating in LBRuT including SPEAR, Glass Door and Vineyard to maximise the accommodation options in the Borough.

Supporting Vulnerable Groups

OUR OBJECTIVES ARE TO:

Ensure vulnerable groups have access to support to maintain their tenancy through the Council's Resettlement Service

Keep under review protocols relating to youth homelessness, monitoring these to ensure that they enable all statutory responsibilities to be met and appropriate accommodation and support is provided

Why is this important?

A whole systems approach is necessary to address homelessness, particularly to deal with those with complex needs requiring a multi-agency response. Homelessness is not only a housing issue but is often as a result of relationship breakdown, domestic abuse, poor mental health, substance misuse and worklessness etc. The Council recognises that an effective service can only be achieved through effective collaboration with a range of partners.

Complex needs mean that vulnerable groups, including rough sleepers, require intensive personalised support to achieve settled accommodation. Tenancy sustainment support is crucial to this and the Council's Resettlement Team has helped over 1,200 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 also funds RHP to provide a tenancy sustainment service for their residents. Citizens Advice Richmond provide multi-disciplinary services, including advice around welfare, debt, rent arrears and employment. The Homeless Health Link service, operated by SPEAR, addresses the mental and physical health needs of rough sleepers assisting them to access primary health care including GPs, dentists, etc.

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 one in 2019/20. A joint working protocol between housing and Achieving for Children (AfC) was developed to ensure ongoing effective collaborative work for homeless 16- and 17-year olds.

In 2016, the Council committed to participate in the Syrian Vulnerable Persons Resettlement Scheme. This is a central government funded initiative aimed at welcoming 20,000 people displaced by the conflict in Syria by 2020³. Between November 2016 and June 2019, the Council has successfully facilitated the resettlement of seven families (27 people including 15 dependent children), often working with Richmond Welcomes Refugees, sourcing good quality private rented homes and providing intensive and ongoing resettlement support post arrival. The scheme is now due to run until 2021.

We will:

- Ensure vulnerable groups have access to support to maintain their tenancy from the Council's Resettlement Team, through RHP's tenancy sustainment service and through continued commissioning of Citizens Advice Richmond.

³ These will be people who have been accepted by the Home Office for entry in the UK, generally after a period of living in refugee camps in the region.



- Continue to support the work of the Homelessness Forum which brings together statutory and voluntary agencies operating across the Borough to discuss issues and share best practice.
- In recognition of the high instances of mental health problems seen in the Borough's homeless people, review protocols ensuring these enable officers to carry out their roles effectively. These protocols will be regularly reviewed and activity monitored to ensure they are being followed.
- Build on the successful, 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 which aim to meet the needs of vulnerable people.
- Keep under review protocols relating to 16- and 17-year olds to maintain low levels of youth homelessness and continue to work closely with AfC in doing so. Ensure officers fulfil their roles as set out in the protocol.
- Continue to participate in the Syrian Vulnerable Persons Resettlement Scheme, facilitating moves into good quality private rented accommodation and ensuring an appropriate support package is in place thereafter.



SPEAR delivers outreach services across the borough

Tackling Rough Sleeping

OUR OBJECTIVES ARE TO:

Achieve a sustained reduction in the levels of rough sleeping

Work with voluntary and statutory partners to assist rough sleepers off the streets and into settled accommodation

Ensure the complex needs of rough sleepers are met through personalised support

Why is this important?

Levels of rough sleeping both nationally and within London have increased significantly in recent years. In LBRuT there were 175 new rough sleepers verified during 2019/20, an increase from 121 in 2018/19. The annual rough sleeper count-

based estimates found 14 rough sleepers in November 2019, the same as in the previous year. The methodological limitations of this should be borne in mind however; it is generally accepted that count-based estimates do not accurately reflect the scale of rough sleeping. Particular

aspects of the Borough, such as the large amount of green space, comparatively low crime and supportive residents, contribute to people remaining local when they start sleeping rough and those who come to the Borough becoming entrenched, hence the high proportion of those with



Gardening at SPEAR accommodation

a local connection. Maintaining local services targeted towards preventing and alleviating rough sleeping is a longstanding priority for the Council.

The Council commissions SPEAR to operate rough sleeper services and a recent review of their clients highlighted the complex nature of rough sleepers' needs. Collaborative working between services and a holistic approach is needed to tackle the root cause of homelessness and address other related issues. The Homeless Health Link service, operated by SPEAR, addresses the health needs of rough sleepers by helping to remove barriers to health

services and reduce the inappropriate use of emergency services. Since April 2015, Homeless Health Link has supported over 370 homeless people, with 92% recording improved physical health and the use of A&E ambulance call outs reduced by 15%.

A snapshot of SPEAR's current caseload in October 2020 provides a demographic profile of rough sleepers who are engaged with the service. Of the 59 rough sleepers on this caseload, 54% have a local connection to the Borough, 90% are aged between 25 and 59 and 86% are male. Compared to the rest of London, the number

of verified rough sleepers with no recourse to public funds is comparatively low, however this may not represent the true scale of this problem. The Council recognises the importance of the work that local charities such as Glass Door do in providing day centres, night shelters and support around reconnection and other migration issues.

Since 2018 the Council has successfully bid for Government grants totalling £1,317,562 to fund additional rough sleeping services until March 2021. As a result, the Borough's rough sleeping pathway and offer to rough sleepers has improved significantly. SPEAR's increased street outreach and inreach services are now able to support more vulnerable people off the streets and into independent living. The Council has also received approximately half a million pounds of Government funding to introduce a four-year Housing First scheme in the Borough. This person-centred approach involves offering a home to rough sleepers and wrapping support services around the person to ensure that they are helped to not only manage their tenancy but address underlying issues such as mental health or drug and alcohol addiction, with the goal of becoming completely independent.



Developing cooking skills at Penny Wade House

The Government's national Rough Sleeping Strategy identifies the need for a holistic approach with a focus not only on housing issues but other factors which may contribute to someone ending up sleeping rough. The Strategy sets out three themes that LAs must focus on to work towards the Government's target of eradicating rough sleeping by 2027: prevention, intervention and recovery. During the coronavirus pandemic over 80 rough sleepers were provided

accommodation and the Council has committed, through its rough sleeper Covid-19 recovery plan, to explore all available options regarding an offer of accommodation and to ensure the full range of support is in place to help people remain off the streets.

We will:

Prevention

- Continue to focus on homelessness prevention for single homeless people who are not in priority need

by facilitating moves into the private rented sector.

- Work with partner agencies making referrals to the service, such as prisons and local hospitals, to ensure discharge from these services is into suitable accommodation with an appropriate support package in place.
- Review the mental health and hospital discharge protocols and ensure that effective joint working arrangements are in place.
- Ensure rough sleeping is a priority at Council multi-agency boards, such as the Safeguarding Adults Board, where rough sleeping was central to the annual learning event held in October 2019.
- Improve the coordination of rough sleeper services by embedding a new role within the department of strategic rough sleeper coordinator. The focus will be to work with voluntary and statutory partners to improve and enhance services and secure funding to achieve this.

Intervention

- Continue to commission SPEAR to provide comprehensive rough sleeper services including outreach services and the accommodation pathway model.
- Work with SPEAR and other partners to provide holistic services including the Homeless Health Link. The Council will also work with its



Delivering food parcels at Penny Wade House

Clinical Commissioning Group (CCG) 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.

- Coordinate a joined-up approach to working with entrenched rough sleepers through the Rough Sleepers Initiative Group. This brings together partners from Community Safety, SPEAR, Housing Services, the Police, Adult Social Services and voluntary agencies with the aim of ensuring targeted intervention is in place to engage with entrenched rough sleepers and those at risk of becoming entrenched.
- Work with local partners to conduct an annual rough

sleeper count and undertake further measures to accurately assess, record and monitor levels of rough sleeping in the Borough.

- Actively support grant applications, working with partners to access funding opportunities to sustain and improve local rough sleeper services.
- Strengthen links with local services providing night shelter services with a view to exploring how their work can go beyond emergency accommodation to benefit rough sleepers with no recourse to public funds in the long term and provide better routes into settled accommodation.

Recovery

- Support SPEAR to maintain current move-on provision for rough sleepers and explore opportunities for expansion both in and outside the Borough.
- Ensure that accommodation provided to rough sleepers is suitable and that support is in place to meet their needs and to work towards tenancy sustainment. Trial a Housing First approach.
- Continue to implement the Covid-19 recovery action plan to ensure rough sleepers housed during the pandemic have access to multi-agency support and an offer of accommodation to prevent a return to the streets.
- Work with SPEAR to continue to provide specialist accommodation for victims of domestic abuse which includes intensive support to overcome the trauma of abuse.



THEME TWO:

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

OUR OBJECTIVES ARE TO:

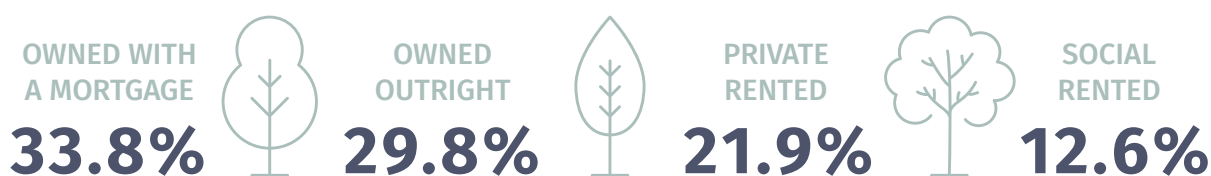
Work in partnership with PRPs, private developers and the GLA to support the development of more new affordable homes

Deliver a range of affordable homes that meet the needs of local residents and workers

Make best use of financial assets and resources, both Council and PRP's, to deliver more affordable housing

Through the Council's housing and planning policies seek to support PRP development to deliver 100% affordable housing schemes

TENURE SPLIT



AVERAGE HOUSE PRICES



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 not all housing demand 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 vulnerable residents live independently in their own homes. There is also a social and economic benefit to providing affordable local housing options for LBRuT's key workers who are employed in public sector and related services, such as health and social care, that provide support to our more vulnerable residents.

Housing opportunities for residents and workers on low-to middle-incomes to access the private housing market are limited. LBRuT is the sixth most expensive London borough and most expensive outer London borough for house purchase. 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 44% between 2012 and 2019.



Laying the first bricks at the Craig Road supported housing development

The Borough has around 10,000 social housing units; this represents the fifth lowest social housing stock in London⁴ and as at 1st April 2020 there were 4,100 applicants on the housing register. The high cost of market housing and scarcity of social housing in the Borough highlight the need for a range of affordable housing products to accommodate the needs of households on a range of incomes.

Table 1 shows the estimated affordable housing delivery between 2019/20 and 2021/22 onwards. The forecast for 2021/22 onwards includes developments with planning consent but not yet on site, those awaiting a planning decision from the GLA and those with feasibilities and designs at an advanced stage where planning applications are expected. There are a number of strategic sites and Council-owned sites expected to obtain

planning consent by 2022/23 which contribute to the increase in forecasted affordable housing delivery. These include the Ham Close regeneration scheme and RECC development which are due to deliver an additional 78 affordable housing units and 97 units respectively. The Stag Brewery and Homebase, Manor Road developments will deliver a total of 529 affordable housing units, subject to a Mayoral decision.

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

Year	Affordable Completions
2019/2020	37
2020/2021	11
2021/2022	78
Post 2021/2022 ⁵	898
Total	1,024

While estimates indicate that delivery will increase, the challenges of providing affordable housing in the Borough cannot be underestimated. LBRuT is a unique borough in that more than two thirds of it is protected by either Open Land or Conservation designations meaning that development is 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. These mean that, although the GLA has increased levels of grant funding available to support the delivery of affordable homes, it remains difficult for PRPs to compete with private developers to obtain sites for 100% affordable housing. Because most developments in the Borough are on smaller sites, below the planning threshold that requires on-site provision of affordable housing, this generally results in financial contributions to affordable housing delivery. However, the scarcity of suitable land available for PRPs to take forward as affordable housing means that there is limited opportunity to use financial contributions for their intended purpose.

⁴ Homelessness Review and Housing Strategy Evidence Base 2017

⁵ At present the number of completions for 2022/23 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 figures Table 1 for Post 2021/22 are therefore the possible estimated number of units that could be delivered based on current information.

The relaxation of permitted development rights to allow conversion of office and retail floor space to residential further impacts on affordable housing delivery as there is no requirement to provide affordable housing as part of such developments. In LBRuT homes completed under permitted development rights accounted for 69% of the net housing completions in 2014/15 and 58% in 2015/16. Although the proportion has declined to 14% in 2018/19, this still has a considerable impact in terms of the number of units delivered.

Reforms of the planning system recently proposed by the Government may further challenge the delivery of much needed affordable housing. The proposals risk undermining the local affordable housing pipeline through changes such as raising the affordable housing threshold on smaller sites and replacing Section 106 and the Community Infrastructure Levy with a new value-based charge for developers. The Council will engage with the consultation process for the proposed reforms, making a robust argument for avoiding changes which negatively impact on affordable housing delivery nationally and locally.

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 recognising that there must be some clear social and community benefit demonstrated to release an employment floorspace for a residential use. As an example, on the St Claire's business park in Hampton Hill Notting Hill Genesis HA has now submitted a planning application to deliver a mixed-use scheme of replacement employment space and 50% affordable housing.

The limited opportunity to develop on privately owned land necessitates a flexible and innovative approach to supporting the development of affordable housing in the Borough. The Council's asset disposal programme is a valuable source of new development opportunities and, having identified potential sites for disposal, the Council is committed to bringing these forward as development options for PRPs for wholly affordable housing; this should always be considered before disposal to private developers is agreed. One such site has already obtained planning consent for 100% affordable housing, delivering 30 affordable homes, with three



Dairy Court, RHP. Provides 31 affordable rent homes



Informer House, RHP. Former newspaper offices will provide 22 shared ownership homes

other sites being prepared for planning application submissions. Where appropriate, the Council can look to achieve a greater number of affordable housing units by disposing of two sites at one time, one for high value market housing which is used to subsidise 100% affordable housing on the other site. Other options, such as land-swap arrangements with partner PRPs, repurposing individual properties, for instance as supported living projects, flexible use of financial resources, are also important in ensuring the Council maximises affordable housing delivery within the particular context of LBRuT.

The Development Delivery Agreement (DDA) with RHP is an example of the Council's dynamic, flexible approach to the way its grant funding is utilised. The DDA approach can be replicated with other local housing providers including housing associations and charitable providers and involves the Council and in this case RHP investing their resources to help secure sites for

affordable housing development and to provide funding to support a higher level of affordable development on privately owned sites. The Council is open to considering innovative approaches and to working with a variety of stakeholders including local residents, to look at new ways of delivering housing to meet the Borough's needs.

The Council supports the Ham Close Uplift redevelopment programme, led by RHP, which aims to deliver better housing and environmental improvements for the estate's residents. RHP are currently in the process of procuring a development partner to assist in the delivery of this regeneration. The current proposed plans are for the provision of over 400 new homes, with the aim being that around 50% will be affordable, improving the green space and contributing to the uplift of the wider area. The proposals estimate that in addition to the replacement of homes for existing RHP tenants and leaseholders, there will be

more affordable homes for rent and low-cost sale delivered.

Innovative approaches to house-building, including modular and off-site construction, are broadly welcomed where they increase affordable housing options, particularly those which seek to address the housing needs of those on lower incomes by providing low cost rented housing to households who are largely excluded from the local private rented sector market but not eligible for social housing.

We will:

Work proactively with PRPs, other housing providers such as almshouse charities, private developers and the GLA to support the development of new affordable homes:

- Continue to support 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 (HfLAHP) and the Addendum programme to the HfLAHP. This will include the delivery of 415 affordable homes across identified sites which require start on site by March 2022.
- Under the DDA with RHP utilise up to £5m Council and Trust Account Deed grant and resources to maximise affordable housing outputs. Using the template DDA developed with RHP, work with our other main PRP partners to develop delivery plans.
- Support the current development plans of RHP, the Borough's main affordable housing provider, which has a firm pipeline of 300 homes and additional new opportunities in preparation.
- Through its housing and planning policies and strategies positively support the delivery of schemes which provide a substantial level of affordable housing that meets the

Borough's affordable housing requirements.

- Continue to work in close partnership with RHP on the proposed Ham Close Uplift redevelopment project with start on site during the lifetime of this Strategy. Provide housing grant if required to support the delivery of additional affordable homes as part of this regeneration.
- Work with PRPs to benefit from the relaxation of permitted development restrictions by bringing forward schemes that will provide new housing which may be suitable for use as affordable housing. Assist PRPs with acquisition of suitable schemes through the appropriate planning process and potentially with grant to ensure that such development opportunities have some local benefit.
- Seek the maximum reasonable amount of affordable housing when negotiating on

individual private residential and mixed-use schemes. This means seeking at least 50% affordable housing, with a tenure mix of 40% for rent and 10% for intermediate housing. In addition, on Section 106 sites, seek a minimum of 40% affordable housing, thus securing GLA grant for all affordable homes delivered.

- Continue to utilise the GLA's London Affordable Rent product⁶ with its currently associated grant levels of £60 - 70K per unit, to maximise the delivery of genuinely 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).



Latchmere Close, PA Housing

⁶ (introduced in the [Affordable Homes Programme 2016-21 Funding Guidance](#))



Fountains Close, RHP. Provides a mix of affordable rent and shared ownership

Deliver a range of affordable products which meet the needs of local residents and workers:

- Support the London Living Rent product as a form of intermediate housing that might particularly suit working households on modest incomes who are not in a position to purchase.
- Support private rented sector build-to-rent developments, where these are in an appropriate location and assist in meeting local housing needs. To ensure these comply with the Government's guidance on providing affordable private rented accommodation (rent set at at least 20% less than the market rent for the equivalent property).
- Ensure that new housing is built to higher technical and environmental standards. Whilst this may result in additional costs it is vital that the affordable housing developed in the Borough meets the environmental standards set out in the Local

Plan and London Plan and, where possible, seeks to go beyond these requirements to demonstrate a proactive response to the climate emergency.

- Explore innovative ways of meeting the accommodation needs of different client groups including older people, people with physical disabilities, mental health problems and learning disabilities. This is set out in detail in Theme Four.
- Periodically review the Council's Tenancy Strategy and Intermediate Housing Policy. Ensure they set out rent levels and affordability thresholds which respond to a range of incomes locally. This will include seeking mechanisms to minimise service charge costs.
- Prioritise, through the Council's Intermediate Housing Policy, shared ownership sales and intermediate rent options to households who live and/or work in the Borough. Seek to ensure that two thirds of these homes are affordable to those

on lower household incomes (currently up to £50,000) and that the homes are affordable to an average household income of £ 56,2000, subject to review).

- Support innovative methods of housing which offer potential benefits including speed of delivery, affordability and bespoke design to meet the requirements of London's residents, providing they meet relevant planning and quality requirements including appropriate space standards.

Make best use of financial assets and resources, both Council and PRPs, to deliver more affordable housing:

- Continue to support PRPs in seeking funding from the Mayor of London's 2016 - 2021 and Addendum affordable housing programmes through continuous market engagement. In addition, to support PRP's in submitting grant applications for GLA funding from the 2021 –



Bessant Drive, PA Housing

2026 Affordable Homes Programme when the prospectus is published (expected November/ December 2020). Following the Mayoral elections in 2022, the Council will continue to lobby for our affordable housing needs to ensure the Borough receives an equitable and fair proportion of future investment programmes.

- Continue to support the payment of commuted sums for affordable housing purposes through the Council's adopted smaller sites planning policies. The Section 106 affordable housing financial contributions form an important part in the Housing Capital Programme funding stream and the Council will endeavour to utilise these more proactively and flexibly through mechanisms such as the DDAs and to support the acquisition of sites.
- Develop a policy setting out how the Council's affordable housing grant may be utilised

flexibly to support affordable housing development, for instance by facilitating the development of 100% affordable housing schemes through subsidising the receipt achieved when compared to that of a planning compliant (50/50 affordable/market) scheme. Ensure the policy allows for innovation and flexibility within appropriate boundaries.

- Continue to use the Housing Capital Programme to support a range of affordable housing opportunities. This will include:
 - The delivery of low cost rented homes;
 - Improvements to existing social housing stock to address the problem of over-crowding;
 - An ongoing programme of private sector empty homes work, and
 - Supporting 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.

- Keep under review the potential to support an affordable acquisitions programme which may involve purchase of homes on the open market to be repurposed as affordable rent housing.

As opportunities arise, continue the Council asset disposal programme, with the Council supporting the delivery of wholly affordable housing schemes on such sites.

Actively encourage dialogue with local housing providers as to how social housing accommodation can be improved through regeneration or better use of their assets. This could include:

- The regeneration of sheltered accommodation where there are shared facilities;
- Infill development of existing estates;
- Extensions and conversions;
- Reconfiguration of existing properties for a different client group.
- Where planning permission is required for short stay letting accommodation, consider the potential impact on the local housing stock and other potential detrimental impacts locally.

OUR OBJECTIVES ARE TO:

Improve conditions in the private rented sector

Continue to prioritise building safety

Secure the efficient use of existing housing stock

Ensure the housing needs of Gypsy and Travellers continue to be assessed and met through well managed licenced sites

Improve housing management standards for residents in PRP accommodation

AVERAGE MONTHLY RENT FOR A 2 BEDROOM HOUSE



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 action⁷ to improve conditions. In 2018/19 the Council's Regulatory Services Partnership (RSP) carried out formal inspections and hazard assessments under the Housing, Health and Safety Rating System (HHSRS) in 81 privately rented properties following complaints about disrepair or poor conditions from tenants.

HMOs are an important part of the private rented sector,

particularly for those whose housing options are limited and would otherwise struggle to afford other forms of housing. However, HMOs are traditionally more likely to be in a poor condition and badly managed and the Council welcomed legislation which brought about mandatory licensing of HMOs in 2006 and 2018 legislation which extended the scope of this. The Council will continue to work with private landlords to ensure HMOs are kept in an appropriate condition and would urge landlords bringing HMOs to market to review both the condition and space standards being offered, encouraging landlords to go beyond minimum mandatory standards where possible. The Council's full policy

statement on HMO enforcement is included as Appendix 4.

The Energy Efficiency (Private Rented Sector) (England and Wales) Regulations 2015 make it unlawful to let residential properties with an Energy Performance Certificate (EPC) rating of 'F' or 'G' unless there is an applicable exemption. Improving the energy efficiency of local homes is an important step in addressing the climate emergency and in alleviating fuel poverty; the Climate Change and Sustainability Strategy provides the framework for work around energy efficiency and other related measures. A key action in the Strategy is the formation of the Richmond Climate Charter which partners, including PRPs,

⁷ The Council will do this using the powers set out in the Housing Act 2004 and the Housing, Health and Safety Rating System (HHSRS)



Haydon Close, RHP.

will be expected to sign up to. This will actively encourage members to conduct their activities in an environmentally, socially and economically responsible way. The Council has been successful in a bid for funding from the Green Homes Grant Local Authority Delivery grant which will be used to improve the energy efficiency of private rented and owned houses in the Borough. The Council has prioritised ensuring the necessary fire safety checks to housing stock across the Borough, both private and PRP housing, are undertaken. The Council supports PRPs' programmes of retrofitting sprinkler systems in its sheltered housing schemes and two high-rise blocks. In 2021 RHP will also be fitting a sprinkle system in the extra care scheme at Sandown Court and has started to specify sprinkler systems in most new buildings, ahead of this being a requirement under the GLA 2021 - 2026 funding programme. Locally, RHP is leading the way in such work

and the Council expects other PRPs to demonstrate the same level of proactive improvement of buildings and ensuring fire safety, including through the sharing of relevant information with the Council in order that efforts can be recognised. The Independent Review of Building Regulations and Fire Safety report was published in May 2018 setting out recommendations for a new regulatory framework covering the design, construction and maintenance of high-rise residential buildings. The Phase 1 report of the Grenfell Tower Inquiry was published in October 2019; this sets out recommendations around the cause of the fire, its subsequent development and the steps taken by the London Fire Brigade and the other emergency services in response to it.

Overcrowding remains a significant issue both locally and regionally and during 2019/20 there were 1,702 applicants with overcrowding points on Richmond's housing queues.

Due to the limited availability of affordable housing options, it is important that PRPs in the Borough utilise their existing stock effectively. This means ensuring that they are working closely with the Council in encouraging and enabling downsizing, that tenancy fraud is detected and properties are brought back into proper use to meet the priorities identified by the Council. A key element of a successful and sustainable downsizing move is having local housing offers available; there are clear links with the delivery of local affordable housing developments, some of which can be prioritised to households from PRP accommodation. The Council will work with PRPs to provide financial incentives for under-occupiers to move out of social rented accommodation into new developments by utilising grant to set rents in line with social rents, where appropriate. As set out in the Tenancy Policy, the Council expects PRPs to protect the tenancy rights of downsizers

so that moving to a different form of tenancy is not a barrier to downsizing. Higher rents payable on smaller properties can also discourage downsizing moves and the Council is keen to work with PRPs to look at how this can be addressed, through for example rent set at the social rent level rather than the (higher) London Affordable Rent level.

The Council's social housing extensions programme is also an important tool in alleviating the problem of overcrowding and making the best use of existing social stock by offering financial support to PRPs to extend and convert homes. The Council will continue to promote this in order that wherever viable PRPs take up this offer. Where appropriate the Council can consider flexibilities to the funding offered where there is

significant or added benefit, for example by enabling a disabled person to continue living in a property that was previously not fit for purpose.

The Council is conscious of the need to achieve a balance between making best use of social stock and providing people with security of tenure, either in their current home or one which better suits their needs. As set out in the Local Context, the Tenancy Strategy directs PRPs to offer fixed term tenancies of at least ten years in recognition of the reasonable degree of security this brings whilst also allowing landlords to make best use of their stock. Fixed term tenancies should not detract from maintaining stable communities and the Strategy recognises that tenants with longer fixed term tenancies are more likely to invest in their

homes and contribute to their communities.

Tackling anti-social behaviour (ASB) is a key aspect of housing management and the Council expects PRP partners to take robust, effective action against perpetrators. Positive action may include obtaining injunctions and evicting perpetrators as well as working with the police to secure closure orders for properties where criminal activity has taken place. RHP is an active partner in key Council-led forums addressing the issue and a multi-agency response to ASB will continue.

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 provides funding to RHP to manage a 12-pitch site in the Borough which, through effective management, meets the needs of the local Gypsy and Traveller community. Licensing of the site ensures that it meets appropriate health and safety standards.

The Council supports social housing tenants and leaseholders of PRPs in the Borough by offering a Tenants' Champion Service, performed by





Haydon Close, RHP.

a local Councillor, for complaints resolution. The service aims to improve housing management standards and offers a mediation service to help resolve complex issues. The service is well regarded and valued by local PRPs and their residents.

The Tenants' Champion led Inter-Agency Forum provides an important platform that brings together partners from PRPs, the Council's Housing Services, Residential and Social Care Services, Mental Health Services, AfC, the London Fire Brigade, 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 restructured and ensures resources are co-ordinated and outcomes are improved for tenants and leaseholders. The Council understands the importance of openness, accountability and good engagement with its residents and communities, and expects its PRP partners to meet

high standards of resident engagement. In order to champion best practice and ensure that resident views are at the heart of decisions about their housing the Council has conducted a review of resident engagement arrangements across the Borough's social housing stock and developed a Resident Engagement Strategy that identifies what we expect from our partners and what they can expect from us. Following the review, the Tenants' Champion is leading work to develop the borough's first Community Ambassadors, a new scheme to give social housing residents from across different PRPs a greater say in things that affect them. Other measures are also being developed via an ongoing working group, involving tenants and leaseholders at an early stage in co-designing new engagement methods.

We will:

Improve conditions in the private rented sector:

- Respond to complaints of poor and unsafe housing, carrying out formal inspections, the removal of hazards and serving preliminary and statutory enforcement notices as necessary.
- Where not constrained by Covid-19 restrictions, inspect all HMOs for licensing purposes and take appropriate action to ensure that all meet new regulatory requirements. Continue to work collaboratively with councils across the region to ensure HMOs are well-managed, given that many landlords operate across borough boundaries.
- Utilise the powers under the Energy Efficiency Regulations to ensure that private landlords meet the requirements and seek to impose financial penalties on those who do not comply. Action the relevant recommendations arising



from the Climate Change and Sustainability Strategy. Utilise grant funding where possible to support private landlords to improve the energy efficiency of their properties.

- Continue to tackle rogue landlords robustly, utilising fully the powers within the Housing and Planning Act 2016 to take enforcement action as necessary and publicise our efforts and what we have achieved.

Continue to prioritise building safety:

- Ensure that PRPs operating in the Borough take a robust response to building safety issues and prepare for the changes to be brought in via the Fire Safety and Building Safety Acts, ensuring residents involvement is central.
- Work with the private sector and London Fire Brigade as appropriate to promote building safety, in accordance with the new legislative requirements.

Secure the efficient use of existing housing stock:

- Continue the Sponsored Moves scheme which offers under-occupying social tenants a package of incentives to move to a more suitably sized home that better meet their needs. Continue to promote this and similar schemes operated by partner PRPs, encouraging PRPs to do the same. Regularly review the success of the scheme and, working with PRPs, seek to improve incentives to increase moves.
- Promote the Council's extensions programme to encourage PRPs to take up this offer for as many homes as possible where extension or conversion is feasible.
- Encourage PRPs to work closely with South West London Fraud Partnership to return properties into use where fraudulent activity has been detected and ensure outcomes are reported to residents and the Council.

- Run a pilot empty homes initiative in the Borough utilising the Council's available capital housing funds to support a dedicated post and provide a budget to support empty properties being bought back into use for affordable housing purposes.

Improve housing management standards for residents in PRP accommodation:

- Offer mediation to resolve complaints. Work with PRPs and encourage best practice in handling and reporting of complaints including setting out what lessons have been learnt and how practices can be improved.
- Work with PRPs to encourage additional provision of activities of social value and to promote best practice around engagement, ensuring they meet the objectives set out in the Council's Housing Resident Engagement Strategy.
- Continue to work with PRPs and other relevant partners to ensure a robust multi-agency response to tackling ASB.
- Support the delivery of multi-agency training to share knowledge and best practice.
- Support the revised decent homes standard outlined in the SHGP, working with PRPs operating in the Borough to ensure that their tenants are housed in good quality homes.



THEME FOUR:

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

OUR OBJECTIVES ARE TO:

Ensure residents affected by welfare reforms have access to appropriate support

Reduce fuel poverty for low income and vulnerable households

Ensure that appropriate housing and support is available to enable older people and people with disabilities to maintain their independence

Support opportunities to improve the housing offer for older people which meets evidenced need, including tenure and level of support

Support the development of housing and an accommodation pathway that meets the needs of people with learning disabilities and mental ill health

Ensure that children and care leavers have access to appropriate support and housing that meets their needs

Achieve DAHA accreditation

Ensure the Council and partner PRPs play an active role in promoting safeguarding children and adults from harm



£125,340

COVERING SHORTFALLS BROUGHT ABOUT
BY THE BENEFIT CAP

THE 2018/19
DHP FUND WAS
£363,500.
AWARDS:



£68,816

TO MITIGATE EFFECTS OF THE SOCIAL SECTOR
SIZE CRITERIA (AKA BEDROOM TAX)

Why is this important?

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. This chapter sets out how the Council supports vulnerable⁸ residents and presents the strategic approach to meeting the housing with care needs of older people, the evidence base and context

for which can be found in Appendix 2.

Since the previous Strategy welfare reform developments, including lowering the Benefit Cap thresholds and implementing full-service UC across the Borough, mean that working with local landlords to mitigate the potential effects of these changes for their tenants remains a key focus

of the Council. The Council created the Welfare Reform Stakeholder Board which brings together key internal and external stakeholders including the JobCentre Plus (JCP), PRPs, Citizens Advice Richmond and other local advice agencies. The group meets regularly to discuss issues arising from welfare reform and works together to address these; this helps to strengthen already effective

⁸ Throughout this theme the term 'vulnerable' is used to refer to residents who have been assessed under the Care Act 2014 as having eligible needs



IN 2017/18 580 OLDER PEOPLE RECEIVED SOME FORM OF HOUSING RELATED CARE IN LBRuT

working relationships between agencies and is particularly useful in providing a direct link to the JCP. Discretionary Housing Payments (DHP) may be used to top-up a shortfall between benefit entitlement and rent in the short-term while a sustainable solution is being sought. The Resettlement Team administer the Local Assistance Scheme which, with an annual budget of £140,000, assists vulnerable residents by providing essential household items. Between 2016/17 and 2019/20 1,086 applications for support were approved.

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%⁹. Fuel poverty occurs when a household's income fails to meet the cost of heating and powering the home adequately. Residents of LBRuT can apply for Cold Buster grants and/or GLA Warmer Home grants which fund central heating, new boilers and other energy efficiency works. Commissioned by Public Health, the Wandsworth and Richmond Assessment Point (WRAP) offers home visits to vulnerable people

providing advice on reducing energy and staying warm and assisting them to access the appropriate grant(s) depending on eligibility. During 2018/19 40 Cold Buster grants were provided; between September 2018 and September 2019 there were 29 applications for Warmer Homes grants with a total value of £83,487. The Council also works with local voluntary sector partners to promote the assistance they provide to the Borough's vulnerable residents including the Hampton Fund and the Barnes Workhouse Fund.

The Council is committed to assisting older people and people with disabilities to remain living independently in their own home for as long as is appropriate. This can include aids and adaptations, making better use of assistive technology, ensuring new homes are built to lifetime home standards, and ensuring necessary support is in place to meet their assessed eligible needs under the Care Act 2014. The Home Improvement Agency (HIA) has sufficient funds in place of over £7m from 2017-18 to 2022-23 to provide Disabled Facilities Grants (DFGs), used

to fund adaptations which on average allow residents to live independently for an additional five years. Between 2014/15 and 2018/19 the Council completed an average of 108 DFGs per year and is committed to continuing to maximise the benefits that this fund provides.

It is vital that the needs of the Borough's older people are understood and that these are reflected in the housing options available. In 2017/18 580 older people received some form of housing related care in LBRuT: 53% were in residential care, 40% were in nursing care, 9% were in an extra care placement and 3% were in a supported living placement. The Council's Adult Services Department assess older people's housing needs and, while these evidence bases focus solely on social care clients they are useful in setting out the social care picture in the Borough and where resources are likely to be needed in the future. The Older People's Housing Care Needs evidence base¹⁰, found that, whilst there may not be immediate pressure for additional accommodation providing extra care, it is estimated that by 2035 there will

⁹ Department for Business, Energy & Industry Strategy – Sub Regional Fuel Poverty England (2015 data)

¹⁰ The Older People's Housing Care Needs evidence base was produced in November 2019 and is yet to be published. Note: this is based on current social care use and projections from the ONS and Public Health England. It DO NOT reflect housing demand in relation to the whole population, but focuses on social care clients only, excluding self-funders. A whole market analysis is outstanding.



Badger House, social housing for clients of the Council's specialist autism services

be a need for additional extra care, nursing and residential places. The Council actively promotes extra care housing as an alternative to residential care, a position set out in its [Market Position Statement 2018](#). A need for additional 'dementia friendly' accommodation has also been identified. In 2017/18 a total of 152 people were in specialist dementia placements for some or part of the year and this number is projected to increase by at least 33% by 2035.

To meet the current and predicted housing needs for older people the Council will ensure that any new accommodation proposed meets the evidential need in the Borough as highlighted in the Older People's Housing Care Needs, the Retirement Housing Review, other evidence bases as they are developed and the Council's Planning Policies. Permission for such accommodation should be given after due consideration of this evidence, including the need for

different tenures such as shared equity housing and housing for affordable rent. An Extra Care Strategy is being developed that will provide clear guidance relating to specific housing needs for some older people, including tenure, and will assist Planning in considering new schemes, particularly when these are wholly private so may not meet a local need for affordable extra care accommodation.

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. Schemes with shared facilities should be modernised to provide accessible and self-contained accommodation.

Alternative housing provision for older people should also be explored to ensure that there is a full range of options available. There are over 150 almshouses in the Borough, the majority

owned and run by The Richmond Charities, which provide low cost accommodation through granting a licence, rather than a tenancy. The Council is aware that, whilst this type of housing may not be suitable for everyone and does not meet the National Planning Policy Framework definition of affordable housing, almshouses offer significant benefits and there may be opportunities to work with almshouse charities to increase this provision if it is felt these benefits could outweigh other policy requirements. The Richmond Charities has increased the number of almshouses in the Borough significantly over the last three years and continues to expand. Almshouse charities provide independent living for the elderly within supportive, secure and caring communities.

The accommodation needs analysis for older persons identifies the need for improving housing options for other vulnerable people who have other 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 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 need for additional 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. This could be using either re-lets from social housing stock or cluster nominations to new build schemes.

The Department is currently in the process of seeking DAHA accreditation which recognises best practice in dealing with

domestic abuse. DAHA's mission is to improve the housing sector's response to domestic abuse through the adoption of an established set of standards. Nationally there is a shortage of refuges for people fleeing domestic abuse and the upcoming Domestic Abuse Needs Assessment undertaken by Community Safety will include reviewing local refuge provision to understand whether need is currently met locally and to support any future funding bids in this area.

We will:

Ensure residents affected by welfare reforms have access to appropriate support:

- Utilise DHP to provide short-term financial assistance to households adversely affected by welfare changes, allowing them time to find a long-term solution such as more affordable housing.
- Continue to facilitate and participate in forums bringing together stakeholders in the Borough to ensure a joined-up effective approach to mitigate any negative effects of welfare reform.
- Continue to commission the Citizens Advice Richmond to provide an advice service to residents around financial inclusion, benefits, moving into work and budgeting. Signpost people as necessary to this service.

Reduce fuel poverty for low income and vulnerable households:

- Continue to promote Cold Buster and Warmer Homes grants through the Resettlement Team, Family Support Team and the Family Information Service to ensure vulnerable households are aware of this assistance.
- As applicable, refer people to partner agencies including WRAP, the Hampton Fund and the Barnes Workhouse Fund to access the support provided by these services.

- Work in partnership with the Mayor of London to support the agreed objectives set out in the [Fuel Poverty Action Plan](#) and take any relevant actions to increase energy efficiency and support those in fuel poverty.

Ensure that appropriate housing and support is available to enable older people and people with disabilities to maintain their independence:

- Maximise use of DFGs to fund adaptations which support residents to continue living in their own home.

- Continue to work in partnership with the Joint Health and Wellbeing Board to support the Better Care¹¹ and [Prevention Framework](#)¹² which sets out actions and prioritises resources across a range of service areas that can defer the need to access care and support.
- Ensure that extra care housing is a truly effective alternative to residential accommodation by supporting schemes which give due consideration to the full range of support for example 24-hour waking provision.

¹¹ 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.

¹² Soon to be refreshed



Clearwater House sheltered housing



Northumbria Court sheltered housing

- Encourage and support partners to develop the use of assistive technology in their housing schemes to help residents remain safe and independent in their homes. To progress work to establish the Joint Control Room across Richmond and Wandsworth, providing the 24-hour Careline service.

Support opportunities to improve the housing offer for older people which meets evidenced needs, including tenure and level of support:

- Work with Planning Services and Adult Services to identify the need for different types of older people's housing through consideration of

available evidence bases. Support proposals which meet evidenced needs, including around tenure and support needs.

- Ensure effective partnership working between health, housing and social care partners continues through the Housing Strategy Group which meets regularly to review provision in the Borough.
- Work with PRPs to identify opportunities to remodel and/or replace existing supported housing schemes, including sheltered schemes that might require modernisation or regeneration.
- Explore how the Council might develop constructive

partnership working with local almshouse charities to increase provision of housing for older people in the Borough.

Support the development of housing and an accommodation pathway that meets the needs of people with learning disabilities and mental ill health:

- Work in partnership with PRPs to meet specific identified needs for young adults with complex needs, including through the disposal of land to enable the delivery of supported housing.
- Continue to work with RHP on a 23-unit development in



Teddington on land disposed of by the Council. This will include 15 general needs affordable homes, three independent flats to support those with learning disabilities towards independent living as well as a shared house for five service users with higher support needs.

- Continue to review all new build schemes to identify opportunities to increase self-contained units of accommodation that can meet the needs of people with lower support needs.
- Work 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.

- Following the Accommodation-Based Care Commissioning Strategy, review current accommodation to ensure that it is suitable and meets evidenced need in the Borough across a range of client groups. This includes providing a sufficient supply of step-down accommodation to support recovery and to ensure that high support places remain available to those who require them.
- Support people to access the right accommodation at the right time to help them manage their mental health through the joint (Richmond and Wandsworth)

Accommodation and Projects Team. Focus on promoting independence and building resilience, rather than just treating or managing symptoms.

- Provide support via the Resettlement Team who can help set up benefits/bills, access to 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.

Ensure that children and care leavers have access to support and housing which meets their needs:

- Assist as necessary AfC's development of a six-bedroom children's home in the Borough which will ease the over-reliance on out-of-Borough placements for children looked after.
- Continue to work closely with AfC to ensure young care leavers are able to find settled accommodation when they are ready for independent living, including where appropriate priority via the social care queue.
- Support care leavers to access financial support including the Leaving Care Grant/Setting Up Home Allowance and once settled into accommodation



Craig Road supported housing for young people with learning disabilities and autism

ensure on-going support is in place from the Resettlement Team or AfC.

Support victims of domestic abuse to access and/or remain in appropriate accommodation:

- Achieve DAHA accreditation.
- Continue to operate the Safety First scheme in partnership with the Police's Community Safety Unit. This 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 safely in their homes.
- Support Community Safety colleagues in developing a Domestic Abuse Needs Assessment and work

collaboratively to meet needs identified by this analysis.

Ensure the Council and partner PRPs play an active role in safeguarding children and adults from harm:

- Demonstrate continued commitment to protecting the welfare of children and vulnerable adults as a regular partner on both the Adults and Children Safeguarding Boards.
- Keep under review joint working protocols including those between housing and AfC and the mental health and hospital discharge protocols in order to ensure that they accurately reflect the collaborative working taking place and that officers carry out their roles with regards to these.

- Continue to complete an annual safeguarding audit to ensure the needs of children and vulnerable adults are being considered through Council processes and procedures.
- Continue to ensure PRPs are involved in the appropriate sub-groups, have access to training and that Council staff complete safeguarding and refresher training every three years.

Additional glossary terms

Social Rent

Housing owned by Registered Providers for which guideline target rents are determined through the national rent regime. These are exclusive of service charges, which are usually low.

Affordable Rent

Introduced in 2011 for new build rented housing, affordable rents can be set at no more than 80% of the local market rent and are inclusive of service charges. In practice the rent will vary for each scheme with rents set by agreement between developers, providers and the Mayor of London for GLA funded schemes.

London Affordable Rents

Introduced by the Mayor in 2027/2018 for new build affordable rent housing in GLA funded programmes with Registered Providers. These replace the Affordable Rents above and are set annually by the GLA each September.

To note, for schemes with affordable rents that are allocated GLA funding in the new 2021 – 2026 affordable homes programme, the rent levels will be set at social rent levels and no longer London Affordable Rent levels.

Intermediate Housing

Intermediate homes are homes available for sale or rent, with those for rent having rents above social rent levels but below open market rents. The

Council requires all shared ownership homes to be marketed exclusively for a three month period to households living and/or working in the borough

The three main types of intermediate housing are detailed below:

Shared Ownership

Shared ownership gives first time buyers the opportunity to purchase a new build or resale property. The purchaser pays a mortgage on the share they own (currently has to be a minimum of 25% and maximum of 75%, although the Government intends to decrease the minimum share to 10%) and pays rent to a Registered Provider on the remaining share (up to a maximum of 2.75% of the unsold equity). The purchaser can 'staircase' to 100% ownership.

For GLA funded shared ownership the GLA require the homes to be affordable to household incomes of up to £ 90,000 pa, assuming housing costs (rent, mortgage and service charges) are no more than 40% of net income with net income being assumed as 70% of gross income. The Council sets its own affordability criteria for shared ownership housing that currently requires two thirds of the homes to be affordable to households on

incomes of up to £50,000 pa with the remaining third up to the aforementioned GLA household incomes.

London Living Rent

These properties are aimed at middle income earners, who want to build up savings to buy a home. The homes are initially let at a discounted market rent for a minimum of three years and tenants are supported to save and given the option to then buy the home on shared ownership terms. It is expected that conversion to shared ownership will occur within 10 years.

The GLA set annual London Living Rent levels by ward level for each borough. For Richmond London Living Rent levels for 2020/21 range from £214pw to £321 pw for a 1 bed and £285 pw to £428 pw for a 4 bed, but in any event, must be affordable to household incomes of no more than £60,000 pa.

Intermediate Rent

A rented product let on assured shorthold tenancies with rents set (inclusive of service charges) at a minimum of 20% below open market rents. The intention of intermediate rent is to provide discounted rented housing for households that do not wish to enter home ownership but cannot afford to rent in the private rented sector.

