

Intermediate Housing Policy Statement

Planning Policy

17 November 2025

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1. Introduction

Context and purpose of this policy

1.1 This policy outlines the Council's approach to the provision and allocation of intermediate housing in the London Borough of Richmond upon Thames ("LBRuT" or "the Borough"). This policy statement includes:

- The eligibility criteria and the prioritisation of applicants for intermediate housing;
- The income eligibility range for intermediate housing schemes;
- The application process;
- The role of developers and Registered Providers (RPs) in marketing intermediate housing in the Borough.

This policy differentiates between intermediate housing products and identifies any cases where the Council's policy approach may vary.

1.2 Intermediate housing is classified within the overall definition of affordable housing in the National Planning Policy Framework (NPPF) as: "housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". Specifically, intermediate housing refers to affordable homes for rent or sale outside of the Social Rent or London Affordable Rent categories. It is targeted at people who have little chance of accessing or are not eligible for low-cost rented housing (such as Social Rent) but who also cannot afford to rent or buy a home on the open market. Intermediate housing is generally priced above Social Rent but remains below full market rates. This approach is adopted by the Greater London Authority (GLA) and forms the basis of the LBRuT Intermediate Housing policy.

1.3 The definition of intermediate housing products can vary between local authorities. For clarity, within LBRuT, intermediate housing includes:

- a) London Living Rent (LLR)
- b) Shared Ownership
- c) Key Worker housing¹

Definitions for these products are provided in the glossary. Intermediate housing is a subset of the broader category of affordable housing. As stated in the Council's Local Plan (Policy 11: Affordable Housing), the following are considered to be genuinely affordable housing products:

- a) Social Rent
- b) London Affordable Rent (LAR)
- c) London Living Rent (LLR) (when delivered in compliance with the Council's Intermediate Housing Policy Statement, as updated)
- d) Shared Ownership (when delivered in compliance with the Council's Intermediate Housing Policy Statement, as updated)

¹ In November 2024, the GLA launched a public consultation on plans to deliver a new type of intermediate housing called Key Worker Living Rent ("Public consultation on Key Worker Living Rent as a form of rent control homes for Londoners"). Though at the time of writing this tenure was not yet in place, the Council share's the GLA's vision that there is a significant demand from key workers across the capital for an intermediate rent product that they can afford.

- e) Key Worker Living Rent – this product is not yet available (see Footnote 1) but should the GLA introduce it as a new tenure it would also be considered a genuinely affordable housing product, based on recently consulted guidance (January 2025).
- 1.4 Discount Market Rent (DMR) is not typically considered by the Council as a genuinely affordable housing product, as rents can be set as high as 80% market rate, and the rates for market rent are particularly high in Richmond. As such, DMR will only be considered if the provision of all other options have been exhausted, and it is necessary in order to provide a policy compliant level of affordable housing.
- 1.5 First Homes and Starter Homes are also not considered genuinely affordable housing within Richmond due to the borough's high house prices, as explained in paragraph 17.20 of the Council's Local Plan.
- 1.6 The need for intermediate housing in LBRuT is evidenced in the Borough's 2021 and 2023 Local Housing Needs Assessments – this evidence is further explored in the accompanying Committee report to this Intermediate Housing Policy Statement.

Delivery of intermediate housing in Richmond

- 1.7 The Council's Local Plan provides the current policy on the delivery of intermediate housing in LBRuT. Local Plan Policy 11 - Affordable Housing (Strategic Policy) states:

“Where on site affordable housing is provided, the Council will require a minimum affordable housing tenure split of 70% Rented Affordable housing and maximum 30% Intermediate housing by habitable room. The Intermediate housing will be delivered in line with the Council's Intermediate Housing Policy Statement...”

This builds upon London Plan Policy H6, which states there should be “a split of affordable products that should be applied to residential development, with 30% low-cost rented homes - London Affordable Rent (LAR) or Social Rent - and 30% intermediate products - meeting the definition of genuinely affordable housing, including London Living Rent and London Shared Ownership,” and that the remaining 40% of affordable housing should be determined by the borough based on local need.
- 1.8 Within the proportion of intermediate units, the Council prioritises London Living Rent (LLR) as this tenure caters for a greater number of households than Shared Ownership, which is unaffordable to a large proportion of households in the borough. Where viability is a consideration in relation to the delivery of Shared Ownership instead of LLR, applicants should first consider if there are grant opportunities available to allow Shared Ownership units to be converted to more affordable tenures, as referenced in the GLA's *Accelerating Housing Delivery, Planning and Housing Practice Note (December 2024)*. Despite Shared Ownership not being a high priority tenure to deliver, it would be considered acceptable if the delivery of Shared Ownership housing facilitates the delivery of a higher number of Social Rent dwellings and/or habitable rooms. Developers can contact the Council's Affordable Housing Enabling Team for guidance on identifying grant funding.
- 1.9 The Council requires developers to deliver 10% of intermediate homes as M4(3) wheelchair accessible units (see Glossary), in line with Local Plan Policy 13 and London-wide standards. These units should be evenly distributed across all intermediate tenures and bedroom sizes unless local

need demonstrates otherwise. To bring accessibility standards for intermediate housing in line with those for social and affordable rent homes, the Council requires that wheelchair user units be fully accessible prior to occupation, where they are rented or purchased by wheelchair users. This ensures the homes are immediately suitable for occupation without requiring further adaptation. All floorplans for wheelchair accessible units must be reviewed and agreed with the Council's Specialist Housing Occupational Therapists. Developers should refer to the Richmond and Wandsworth Accessible and Inclusive Housing Report (May 2023) or any updated guidance² as advised by the Council's Specialist Housing Occupational Therapist (SHOT) team. Early engagement on the provision and design of wheelchair accessible units with the Council's SHOT team would be welcomed.

- 1.10 The Council will support innovative forms of housing that contribute to the delivery of intermediate housing, provided that all relevant planning requirements are met. This may include Community Land Trusts where homes for rent are managed by an RP and allocation criteria require prospective tenants or owners to demonstrate a link with the Borough. Where a Community Land Trust proposes to deliver intermediate housing with pricing based on local incomes, the Council will require that the housing remains genuinely affordable in perpetuity.

Intermediate housing and viability

- 1.11 The GLA introduced an Accelerated Funding Route under the current Affordable Homes Programme 2021-2026 to support the delivery of affordable housing. This route increases grant rates for London Living Rent (LLR). It also expands the scope of the Fast Track Route (see Glossary) by allowing developers to provide 20% affordable housing on site, whilst providing a further 20% through grant. These measures incentivise the delivery of Social Rent and LLR by increasing access to grant funding and supporting a higher overall quantum of affordable housing on site.
- 1.12 In addition, the GLA published their *Accelerating Housing Delivery Practice Note*³, which further increases grant rates as follows:
- a) London Living Rent: £110,000 per unit
 - b) Discount Market Rent: £90,000 per unit
 - c) Shared Ownership: £55,000 per unit.

This will impact on the viability of schemes and the probability of delivering intermediate rent over intermediate ownership units, as it could result in London Living Rent dwellings providing better returns to the developer than Shared Ownership.

- 1.13 The Mayor of London has stated his preferred intermediate rent tenure is London Living Rent (LLR), with the benchmark weekly rents published annually by the GLA⁴. There is also a proposal within emerging GLA guidance (referred to within the recently consulted on "*Key Worker Living Rent as a form of rent control homes for Londoners*") that intermediate rent levels could increase annually on the basis of either wage rises or inflation, and there is potential for more regular reviews of income caps. These caps will continue to be reviewed annually by the Council in a local context to ensure LLR is accessible to households on lower incomes within the Borough's context. Taken together, these measures give Registered Providers additional longer-term certainty for

² Such as the Habinteg Inclusive Housing Design Guide, 2024

³ [Accelerating Housing Delivery - Planning and Housing Practice Note December 2024](#)

⁴ [Accelerating Housing Delivery - Planning and Housing Practice Note December 2024](#)

intermediate rented tenures that the value of these properties will not degrade over time.

2. Eligibility

- 2.1 To be eligible for intermediate rent or home ownership properties in LBRuT, prospective tenants or buyers must either live or work in the Borough. This specifically means they must:
- Have their primary residence in LBRuT (see Glossary); and/or
 - Be employed within LBRuT (see Glossary).
- 2.2 Applicants must not already own a home. Any existing home must have been sold before purchasing or renting an intermediate housing product.
- 2.3 Households living or working in pan-London, but not in LBRuT, may still apply. If properties remain available after providers have marketed them for the period agreed with the Council and cannot be filled by applicants living or working in the borough, then the provider can consider the application. The provider must notify the Council before doing so.

Priority Cascade

- 2.4 Whilst all households that meet the core criteria in paragraph 2.1 are eligible for intermediate housing, applying households will be prioritised according to the following priority cascade. This list is hierarchical – priority is assigned in the order below:

Priority 1:

- Social Rent tenants and other tenants of Affordable Rent products living in LBRuT (see Glossary).
- Households on LBRuT's Housing Waiting List assessed as Category A or B for social housing, in accordance with the Council's [Allocations Policy](#), who have the financial means to purchase or rent intermediate rate housing.

Priority 2:

- Key Workers living or working in LBRuT as defined in the GLA's *Allocating intermediate homes to London's key workers* guidance (see Glossary).

Priority 3:

- Members or former members of the Armed Forces currently living in LBRuT or previously having lived in LBRuT for 12 consecutive months.

Priority 4:

- Households assessed by the Council as homeless or threatened with homelessness under Part VII of the Housing Act 1996, who are not currently placed in temporary accommodation.

Priority 5:

- Any other household living or working in the Borough, including those already living in intermediate or market housing, who can demonstrate overcrowding and do not have the financial resources to access appropriately sized market housing.

Priority 6:

- Households living in the private rented sector who are displaced through Council-led regeneration schemes.

Priority 7:

- Any other households with their primary residence in LBRuT and/or employed within LBRuT, as stated in core eligibility criteria.

- 2.5 Within each priority band, where two or more applicant households apply for the same scheme, priority will be determined firstly by gross household income (with lower-income households receiving greater priority) and subsequently by the date of application (with earlier applicants given priority).
- 2.6 Applicants will be required to provide evidence of how they meet eligibility criteria in the priority cascade as part of the application process. Further details are set out in Section 5 of this Statement.
- 2.7 Where reasonable efforts to obtain evidence of priority status have been exhausted and remain inconclusive, RPs may default to allocating the home to the household with the lowest gross income.

3. Income Eligibility and Affordability

- 3.1 The Council follows the headline income eligibility criteria included in GLA guidance. This stipulates the following income caps for households seeking intermediate housing:
- a) For London Living Rent, households must not have a gross annual income of more than £67,000.
 - b) For intermediate home ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of genuinely affordable housing), households must not have a gross annual income of more than £90,000.

This means that intermediate housing products must remain affordable to households on incomes up to the caps shown above⁵.

- 3.2 These caps will be updated annually and will be included in any further iterations of the Affordable Housing Update Report for Richmond. The GLA may also update their guidance on income thresholds as part of the London Plan Annual Monitoring process and the Council will review this policy accordingly.
- 3.3 As per GLA guidance, the Council has set bands of income less than the overall eligibility cap of £67,000 for intermediate rent and £90,000 for Shared Ownership. This is to ensure accessibility of intermediate housing to households with a range of incomes. The income bands are set out as follows:

For intermediate rent:

⁵ As a Rent to Buy product, London Living Rent was initially created as a product to allow tenants to save for future home ownership. Therefore, when considering affordability, some RPs may consider whether households can afford to both pay the rent and accumulate savings.

- 1/2 (one half) homes affordable to households on gross incomes of up to £50,000
- 1/2 (one half) homes affordable to households on gross incomes of up to £67,000.

For Shared Ownership:

- 1/2 (one half) homes affordable to households on gross incomes of up to £60,000
- 1/2 (one half) homes affordable to households on gross incomes of up to £90,000.

- 3.4 After three months of marketing units at the lower income bands, if units remain unsold or unlet then Registered Provider (RPs) are able to raise the price and eligibility of those units to the highest relevant income cap.
- 3.5 RPs are responsible for ensuring that intermediate homes remain affordable. London Living Rent (LLR) benchmarks are updated by the GLA annually and are based on changes in the median gross household income for London and house prices. RPs should consult LLR benchmarks⁶ when setting the rent and subsequent increases in rent for any intermediate rent products.
- 3.6 An RP may request the removal of lower income bands if their inclusion would render the affordable housing units unviable or undeliverable. This request must be submitted in writing to the Affordable Housing Enabling Officer and include robust evidence demonstrating that all reasonable options to deliver the units at the stated affordability levels have been thoroughly explored and exhausted. The Council will assess the request based on the evidence provided and may require additional data to support its decision. Each case will be considered individually, considering the specific circumstances and viability constraints.
- 3.7 RPs should also be mindful of the impact of service charges on affordability. Note that all housing providers receiving funding through the GLA Affordable Homes Programme 2021-26 are expected to sign up to the Service Charges Charter. The charter ensures RPs are meeting expectations around transparency and affordability of service charges, encourages a design approach to minimise service charges and ensures leaseholders and tenants are aware of processes around challenge and redress. More information can be found on the [Mayor of London's Service Charge Charter webpage](#).

4. Marketing of Intermediate Housing

- 4.1 Registered Providers (RPs) must submit a local marketing plan as per the requirements within the Council's Intermediate Housing Marketing Statement (see Appendices), for approval by the Council's Affordable Housing Enabling Team. A reference to the plan will be included in the S106 agreement for new developments. The marketing plan should be provided to the Council 3 to 6 months prior to the marketing of the scheme, subject to the specifics of the scheme and to be determined in consultation with the Affordable Housing Enabling Officer.
- 4.2 RPs should refer to the Council's Intermediate Housing Marketing Statement within Appendix 1, 1A and 1B, or any future updates to this statement, for guidance on the marketing plan. In summary, marketing should include the following core elements:

⁶ London Living Rent benchmark rent levels are updated annually and published by the GLA here: <https://www.london.gov.uk/programmes-strategies/housing-and-land/buying-and-owning-home/london-living-rent>. RPs should specifically consult the London Living Rent benchmark set for London Borough of Richmond upon Thames when setting rent and service charge for intermediate rent in the Borough.

- a. Primary marketing: marketing directly to LBRuT residents and workers, and especially existing Social Rented tenants. The Council recommends working collaboratively with the main stock-holding RPs in the Borough to market to their social tenants.
 - b. Secondary marketing: marketing through existing networks to organisations / parties who may be able to signpost applicants. As a suggestion, these could include Partnership forums, money advice services covering LBRuT area and community/faith-based organisations.
 - c. The marketing plan should demonstrate the following framework:
 - i. Awareness raising (e.g. features, benefits and accessibility)
 - ii. General target marketing
 - iii. Direct target marketing (further detail on target groups is in the Intermediate Housing Marketing Statement)
 - iv. Breakdown of proposed marketing channels/medium
 - v. Process for the marketing of resales.
- 4.3 During marketing, data should be collected on applicants for all schemes, in order to monitor the uptake of intermediate housing according to eligibility and income and between different priority bands and target groups. Using this data, RPs can work with the Council to review the allocations policy should they see a change in demand or types of households putting themselves forward for intermediate housing.
- 4.4 As per GLA policy, London Living Rent and Shared Ownership properties should be marketed exclusively to households living or working in LBRuT for a three-month period, prior to cascading wider to pan-London nominations, to prioritise households with a clear connection to the borough.
- 4.5 RPs have the option of marketing their intermediate housing properties themselves or partnering with a marketing agent. RPs are responsible for ensuring newly available intermediate homes under their ownership are advertised on the [Homes for Londoners](#) website by liaising with the website management company. This includes relets and resales, as stipulated by London Plan (paragraph 4.6.10).

5. How to apply for Intermediate Housing

- 5.1 To register and apply for intermediate housing opportunities in the Borough, applicants must use the GLA-managed [Homes for Londoners](#) property search website. This platform enables applicants and Registered Providers (RPs) to engage directly when new schemes become available. The Homes for Londoners website advertises London Living Rent, Discount Market Rent and Shared Ownership properties.
- 5.2 For intermediate housing specific to key workers, applicants should enquire directly with RPs.
Please note: The Council do not make referrals to RPs.
- 5.3 Once an applicant has registered interest in a property via the Homes for Londoners website, the relevant RP or their appointed marketing agent will contact the applicant to verify eligibility and request any further information. Applicants will be required to provide evidence of household income and other eligibility criteria. At this stage, applicants will be assessed and selected for the

property in accordance with the eligibility criteria and the priority cascade outlined in Section 2 of this statement.

- 5.4 If an applicant is successful in securing an intermediate rental or ownership property, all future housing management matters will be handled directly with the RP as the landlord.
- 5.5 If an applicant is unsuccessful in securing a property through the Homes for Londoners website, they may choose to contact the relevant RP directly regarding other schemes. It is then at the discretion of the RP or their appointed marketing agent to contact registered households should a similar or otherwise suitable intermediate property become available.

6. Glossary

The following glossary gives a definition for the key terms used in this policy.

Affordable Rent products

Affordable rent products include Social Rent and other affordable rent tenures, such as London Affordable Rent, where rent is significantly less than 80% of market rate and is set in line with [social housing rent-setting guidance](#) published by the Regulator of Social Housing. Rent for these products is usually exclusive of service charges.

Discount Market Rent

A type of affordable home generally provided in Build to Rent schemes. Homes rented at a discount of at least 20% below market value to qualify under the government's definition of affordable housing. Rent is inclusive of service charges.

Discount Market Sale

A type of affordable home for purchase. Homes sold at a discount of at least 20% below market value to qualify under the government's definition of affordable housing.

Employment in LBRuT

Employment within the borough includes permanent employment or fixed-term employment (including zero-hour contracts) or registered within the borough as self-employed. The employment criterium will be considered by the housing provider on a case-by-case basis, should a resident's employment status differ from the above.

Fast Track Route

Under the Threshold Approach, development proposals that provide 35% affordable housing or 50% on public and industrial land (where industrial floorspace capacity is not being re-provided in line with policy E7, industrial intensification, co-location and substitution) and that meet affordability and tenure mix requirements, can follow the Fast Track Route (FTR). The FTR removes the need to submit detailed viability information and thus enables developments to progress more quickly through the planning process.

First Homes

[First Homes](#) are discounted market sale units which:

- must be discounted by a minimum of 30% against the market value;
- are sold to a people meeting the First Homes eligibility criteria;

- on their first sale, will have a restriction registered on the title to ensure this discount and certain other restrictions are passed on at each subsequent title transfer, and;
- after the discount has been applied, the first sale must be at a price no higher than an upper cap determined by the Ministry of Housing, Communities and Local Government (MHCLG).

First Homes was introduced as an affordable home ownership product by MHCLG in 2021, although it is not widely available in LBRuT.

Housing Needs Register

A register for households with open applications for Social Rent housing. Once registered, applicants are placed in a housing access queue and a points system is used to determine housing application priority.

Key Worker

Key Workers are defined broadly as those who have a direct role in providing the services Londoners rely on. The GLA defines Key Workers within the following parameters:

- occupations that are considered essential to the functioning of London in normal times.
- occupations where there is a requirement for an employee to be anchored at their workplace in London to carry out their role.
- to be eligible for intermediate housing, incomes must remain below the income caps defined for intermediate housing within the London Plan.

In a more specific definition, the GLA has chosen to adopt the Office for National Statistics (ONS) occupation-based definition of key workers for the purposes of allocating intermediate housing. This core list of Key Worker occupations is in the Appendix of the [GLA Housing Policy Practice Note 'Allocating intermediate homes to London's key workers' \(2021\)](#).

Key Worker Housing

Housing for workers providing an essential service that is also local to their place of employment. Key workers are defined by the Mayor's core list of key workers, classified by occupation, in the [GLA Housing Policy Practice Note 'Allocating intermediate homes to London's key workers' \(2021\)](#). Rent is typically inclusive of service charges.

London Affordable Rent (LAR)

Rental product for households on low incomes with rents being significantly less than 80 per cent of market rents. Since the end of 2022/23 the GLA no longer publish benchmark LAR rent levels. For subsequent years, providers should apply their own updates to the benchmarks in line with the [social housing rent-setting guidance](#) published by the Regulator of Social Housing. Rent is exclusive of service charges.

London Living Rent (LLR)

London Living Rent offers middle-income Londoners a lower rent with stable tenancies, with the aim of enabling them to save for a deposit to purchase a home. LLR levels are set at a ward level with figures published by the GLA on an annual basis. It is suggested that as LLR can be a step to homeownership, it can be considered as an affordable homeownership product. LLR is available to households with an income of up to £67,000. Rent is inclusive of service charges.

Overcrowding

Over-crowding relates to the occupancy rate of a home. The Office for National Statistics defines the occupancy rating as a measure of whether a household's accommodation is overcrowded or under-occupied. An occupancy rating of negative 1 or less implies that a household has fewer bedrooms than required according to the Bedroom Standard, so is overcrowded (for example, negative 1 means one bedroom fewer than required, negative 2 has two fewer than required).

Primary residence

A primary residence (also known as a principal residence) is where a household habitually lives for the majority of their time⁷. Applicants for Intermediate Housing in LBRuT must provide evidence of a residential address to prove it is their primary address.

Social Rent

Social rents are set based on a formula set by Government since 2001. This creates a 'formula rent' for each property, which is calculated based on the relative value of the property, relative local income levels, and the size of the property. An aim of this formula-based approach is to ensure that similar rents are charged for similar Social Rent properties. Rent is exclusive of service charges.

Shared Equity

A form of affordable home ownership whereby the equity in a home is shared between the buyer and another organisation, normally the Government, Local Authority or Registered Provider. Shared Equity schemes enable homebuyers to pay a smaller deposit towards their home (usually 5%) and then top up the deposit (usually up to 20% of the purchase price) with an equity loan. It differs from Shared Ownership because the buyer owns the entire property with a loan on part of the deposit, whereas Shared Ownership buyers only own a share of the property, with the opportunity to buy more shares over time.

Shared Ownership

Shared Ownership is an intermediate ownership product which allows households who would struggle to buy on the open market to purchase a share in a new home and pay a low rent on the remaining, unsold share. This rent is charged by the scheme owner, which in most cases would be a Registered Provider or the Local Authority. In London, Shared Ownership is available to households with an income of up to £90,000. Shared Ownership rent and mortgage charges are exclusive of service charges.

Wheelchair accessible housing

There are multiple categories of accessible housing. Those that are specifically wheelchair accessible, as defined by Building Regulations Approved Document M (volume 1), are:

- M4(3)2a: these units are wheelchair 'adaptable' and must show that adaptations can be easily adapted without moving stairs, services or walls.
- M4(3)2b: these units are designed to be accessible from the outset, are ready for a wheelchair user to move in and include features such as wheelchair charging/storage area, installed through floor lift, accessible kitchen and shower.

⁷ Taken from the [HM Revenue and Customs \(2016\)](#) definition for primary residence.

Appendix 1 - Intermediate Housing Marketing Statement

1. Introduction

- 1.1. Registered Providers (RPs) must submit a local marketing plan for approval by the Council's Housing Enabling Team. A reference to the plan will be included in the S106 agreement for new developments. The marketing plan should be provided to the Council 3 to 6 months prior to the marketing of the scheme, subject to the specifics of the scheme and to be determined in consultation with the Affordable Housing Enabling Officer.
- 1.2. The overall objective of the marketing statement is to:
- a) Raise awareness of the features and benefits of intermediate housing products in Richmond, to ensure that the service offered is inclusive.
 - b) Set out a marketing framework for RPs to help to prioritise sale to eligible people who live or work in London Borough of Richmond upon Thames (LBRuT).
 - c) Ensure that RPs adopt a standard approach to marketing, including target marketing of existing tenants in social housing; Black, Asian and Minority Ethnic households; and households affected by disabilities, mobility issues and other vulnerabilities.
 - d) To affirm collaborative working between the Council and RPs to promote intermediate housing as an option for local residents.
 - e) Ensure that the Council is able to monitor the take up of intermediate housing by local residents and capture statistical data which will inform future service provision as well as the cycle of continuous improvement.
- 1.3. The Intermediate Housing Marketing Statement aims to create a framework for RPs to ensure that the Council's priorities in relation to intermediate housing are promoted and marketed through a range of accessible marketing channels with a view to informing, engaging and empowering local residents.
- 1.4. RPs are asked to ensure that they familiarise themselves with this Statement along with other key documents relating to affordable housing development and planning in LBRuT.

2. The general approach to marketing in Richmond

- 2.1. Registered Providers (RPs) may deliver intermediate housing opportunities through a number of funding sources including the Greater London Authority 2021-2026 Affordable Housing Programme, the Council's funding support and their own resources. The Council will support RPs' bids for grant funding subject to compliance with the Council's own approach to affordability of intermediate housing and the agreed approach to marketing.
- 2.2. The Council will require RPs to submit a completed marketing plan as part of Section 106 planning agreements as a formal requirement when implementing planning permission (please see Appendix 1A and 1B below).

3. Marketing periods for intermediate housing schemes

- 3.1. As included in the main body of the Intermediate Housing Policy Statement, there is a requirement that the total marketing period should include a period of up to 3 months after practical completion of a scheme. RPs are required to market properties exclusively to households

living or working in LBRuT for a 3-month period. Thereafter, RPs should follow the cascade arrangements as included in Section 15 below, after discussion with the Council.

- 3.2. For Shared Ownership properties, the Council supports the completion of a show home prior to the commencement of marketing to help to bring the property to life and provide a useful insight into space management and ergonomics for prospective purchasers (dependent on the size constraints of the scheme).
- 3.3. In instances where the Council is supporting a development with its own funding resources, the Council may require a longer period of exclusive marketing to the Council's intermediate housing priority groups, and this will be discussed with the RP when the marketing plan is being agreed.

4. Marketing arrangements for all intermediate housing schemes

4.1. Marketing should be based on the following framework:

- a) Awareness raising (e.g. home features and benefits, debunking myths, accessibility)
- b) General target marketing
- c) Direct target marketing (e.g. Black, Asian and Minority Ethnic households, people with disabilities, specific client groups)
- d) Breakdown of proposed marketing channels (see examples in Section 14)
- e) Process for the marketing of resales.

5. Marketing: role of Registered Providers

- 5.1. It is expected that all Registered Providers (RPs) take primary responsibility for the marketing of intermediate housing developments in LBRuT. All intermediate homes are required to be added to the [Homes for Londoners](#) website by liaising with the website management company. This includes relets and resales, as stipulated by London Plan paragraph 4.6.10.
- 5.2. The Council wishes to prioritise the sale and letting of new intermediate homes to Richmond Borough residents and local borough workers. RPs should therefore restrict marketing to eligible households in accordance with this marketing statement for the first three months of any marketing period.
- 5.3. RPs are expected to ensure that the marketing of intermediate housing incorporates the following core elements:
 - a) Primary marketing: marketing direct to the residents of LBRuT and those employed within LBRuT.
 - b) Primary marketing: marketing directly to existing social tenants.
 - c) Where an RP does not have a large stock holding in the Borough, the Council recommends that primary marketing includes working collaboratively with the main stock holding RPs in the Borough to market to their tenants. This should include Richmond Housing Partnership and PA Housing as they hold the majority of the existing social rented stock in the Borough.
 - d) Secondary marketing through existing networks to organisations and parties who may be able to signpost applicants, e.g. partnership forums, local businesses, money advice services or credit unions covering LBRuT. This could also include attending fairs and events even if not directly relevant to intermediate housing, because it will facilitate networking with partners to gain additional secondary marketing channels (i.e. to their clients).

6. Pre – meetings

6.1. Registered Providers (RPs) are expected to meet with the Housing Development Team at least 3 months prior to marketing commencing. RPs will be expected to provide the following information at this stage:

- a) Key contact details
- b) Details of unit schedule and phasing schedule
- c) Branding details
- d) Demonstrate how unit(s) meets the Council's intermediate housing priority tenures
- e) Local Marketing Plan (for schemes with units of 10 or more).

6.2. During the preliminary meetings RPs will be supplied with the following:

- a) Guidance on use of the Council's logo/endorsement
- b) Guidance for development of marketing plan including timeline/schedule
- c) Clarification of the role of the Council in relation to supporting the marketing process for unit(s)/scheme(s)
- d) Guidance on the completion and submission of outcomes relating to take up (including the overall take up and take up amongst minority groups).

6.3. The Council is prepared to allow some degree of flexibility in relation to pre-meetings especially where there are only a few units in development.

7. Marketing framework for small scale developments (less than 10 dwellings)

7.1. The Council considers small scale developments as developments comprising of less than 10 units.

7.2. For Registered Providers (RPs) delivering fewer than 10 units, the expectation is that they follow the Council's marketing checklist (see Appendix 1A). Where an RP is likely to deliver 10+ units as part of a programme over 12 months, a marketing plan will need to be produced (see Appendix 1B).

7.3. RPs are expected to market small scale developments to ensure that potential purchasers are made aware of new schemes.

7.4. Appendix 1A sets out the minimal marketing activities required by RPs in the form of a quick reference checklist. All RPs are expected to ensure that all minimum marketing activities are completed.

8. Marketing framework for large scale developments (10 or more dwellings)

8.1. The Council considers large scale developments as developments comprising of 10 or more intermediate units.

8.2. Registered Providers (RPs) delivering 10 or more units are expected to ensure that the checklist used for small scale developments in Appendix 1A is fully actioned prior to the completion of a detailed marketing plan.

8.3. Further to preliminary discussions with the Council, RPs are expected to provide the Council with a completed marketing plan for large scale developments. A marketing plan template can be found in Appendix 1B.

8.4. Marketing activities may commence up to 6 months prior to practical completion date, however marketing activities must begin within 3 months of completion. The timescale for the development and submission of marketing plans is negotiable and will be discussed and determined during pre-meetings (see Section 6).

9. Marketing information

9.1. The Council is keen to ensure that borough residents have sufficient information about intermediate housing in order to make informed decisions in relation to the different products available. Registered Providers (RPs) should aim to ensure that marketing information contains the following broad elements:

- a) Property specification/overview
- b) Location
- c) Eligibility.

9.2. RPs are expected to ensure that all properties marketed on websites are accompanied by a clear disclaimer which stipulates that the property description acts as a guide only. RPs must have due regard to the Digital Markets, Competition and Consumers Act from 6 April 2025.

9.3. RPs should include the following information when marketing units or schemes on websites:

Basic marketing information

9.4. The following is regarded as the minimum level of marketing information which should be available on any websites:

Property specification/Overview	Location	Eligibility/costing/additional information
<ul style="list-style-type: none"> • Status i.e. under construction/under offer • Property type • Bed size • Floor level • External and internal photographs or Computer-Generated Imagery [CGI] • New build or resale • Viewing arrangements 	<ul style="list-style-type: none"> • Postal address • Postcode 	<ul style="list-style-type: none"> • Eligibility criteria • Full market price • Share price (for Shared Ownership units) • Monthly rent • Service charge • Length of tenancy available for intermediate rent • Whether the scheme has mixed tenure types.

Additional marketing information

9.5. The following is regarded as additional information which may be available on a website or available upon request:

Property specification/Overview	Location	Eligibility/costing/additional information
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<ul style="list-style-type: none"> • Floor plans/detailed layout • Design specification e.g. kitchen, appliances, shower, bathroom etc. • Parking facilities including garage, permits etc. • Energy source; gas/electric • Energy performance, including for resales • Garden: sole use or communal • Outside storage facilities • Internet connectivity 	<ul style="list-style-type: none"> • Local Authority • Council tax band • Map of local area and amenities including schools and transport links 	<ul style="list-style-type: none"> • Minimum deposit/rent in advance • Recommended/required income level • Years on lease (resales) • Web link to energy calculator • Sinking fund (as applicable) • Frequently asked questions • Recommendation that prospective buyer obtains independent financial advice
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10. Marketing to minority groups

- 10.1. The Council is keen to ensure that Registered Providers (RPs) actively engage with groups who are under-represented as homeowners such as those with a disability and Black, Asian and Minority Ethnic households. RPs should adopt a standard approach to marketing including direct target marketing to the following groups: existing tenants in social housing; Black, Asian and Minority Ethnic households; households affected by disabilities and other vulnerabilities; and those who are found to be under-represented in the intermediate housing tenure group. Examples of direct target marketing may include advertising in specialist or culturally specific press and radio stations.
- 10.2. The Council is also keen to ensure that RPs take reasonable steps to promote and raise awareness of the features and benefits of intermediate housing amongst the target groups listed above.
- 10.3. Where possible, RPs should work collaboratively with local community-based organisations, with a view to promoting intermediate housing to a specific customer base.
- 10.4. RPs are expected to give due thought and consideration to marketing imagery, for example, imagery which depicts households of various diverse identities.
- 10.5. RPs are expected to contact the Housing Enabling Team for an updated list of community and local organisations with a view to target marketing.

11. Marketing wheelchair accessible units

- 11.1. The Council remains committed to meeting the intermediate housing needs of all local people including those who require wheelchair accessible properties. The Council aims to continue to work collaboratively with Registered Providers (RPs) to ensure that we effectively promote intermediate housing products to wheelchair users and households affected by mobility issues.
- 11.2. All RPs are reminded that wheelchair accessible units must be developed in accordance with the Council's Local Plan policy requirements. These requirements are also stated in paragraph 1.9 of the Intermediate Housing Policy Statement.
- 11.3. RPs are asked to consider marketing wheelchair accessible units at the earliest opportunity. An awareness raising campaign of accessible units should begin 9 months before practical completion and should include a basic description of access features and adaptations. RPs should aim to

contact the Council's Specialist Housing Occupational Therapist team and specialist organisations in LBRuT who may have wheelchair users as part of their client base.

- 11.4. RPs are expected to ensure detailed property specification descriptors are disseminated to potential applicants as part of marketing, including details such as room sizes and specific features, for example wet rooms, movable kitchen worktops and electric wheelchair charging points.
- 11.5. RPs should aim to liaise with the Council with a view to utilising the Council's existing marketing vehicles such as the Council's website, free newspapers and internal and external publications and platforms as appropriate.
- 11.6. If, after 6 months of marketing, there is no take up of wheelchair adapted properties, RPs should aim to market and sell units to general needs, i.e. households without a need for an accessible unit.
- 11.7. The Council's expectation is that any subsequent resale of the property should be subject to parallel marketing: marketing to both wheelchair and non-wheelchair users. However, priority must be given to wheelchair users.
- 11.8. RPs are expected to give due thought and consideration to marketing imagery, for example, imagery which depicts wheelchair users/non-ambulant households.
- 11.9. In some instances, the Council may be able to identify a potential purchaser who has sufficient priority and therefore would require an RP to design an intermediate housing unit to meet the specific needs of a specific wheelchair user.

12. Marketing of extra care shared equity (age appropriate) housing

- 12.1. The Council anticipates that the demand for extra care shared equity products in LBRuT is likely to increase given the continued trends in relation to the needs of an ageing population and societal changes. The Council remains committed to increasing the housing options available to older people and maintaining older people's independence in the home.
- 12.2. The Council recognises that the marketing of extra care shared equity requires a broader set of parameters given that the product focuses on Shared Ownership coupled with a service element i.e. care and support.
- 12.3. All Registered Providers (RPs) developing extra care shared equity schemes in LBRuT will need to produce a marketing plan as detailed above. It is anticipated that close consultation and liaison with the Council's Adult Social Care Service will be required as part of the marketing framework. Along with standard marketing information related to the property specification, the marketing plan will need to include marketing relating to the quality and consistency of the service element. Adult Social Care Service will have input to the prioritisation of applicants for extra care homes.

13. Marketing of resales and relets

- 13.1. The Council recognises that reselling Shared Ownership properties (resales) and reletting intermediate rent properties (relets) is important to Registered Providers (RPs). The Council also recognises that many leaseholders have a "nomination period" built into their lease: usually 8 weeks, when RPs can market a property to potential buyers (nominees) from their waiting list before the property is put on the open market. The Council will therefore take a flexible approach

to resales and relets; however, RPs are expected to ensure that reasonable levels of marketing activities are undertaken and the Council's priority to provide home ownership opportunities for those living or working in LBRuT is met. For example, the following would be considered reasonable steps:

- a) Actions from the checklist in Appendix 1A are completed
- b) Properties are listed on the RP's website
- c) Properties are listed on Homes for Londoners website

14. Recommended marketing channels

14.1. To ensure effectiveness, Registered Providers (RPs) should aim to adopt a blended approach to the use of marketing channels. Using a variety of marketing channels will help to ensure a broad range of residents are reached. Examples of recommended marketing channels include:

Print	Digital and Interactive	Social Media	Other
<ul style="list-style-type: none"> Newsletters and newspapers e.g.: Richmond and Twickenham Times, London-wide newspapers Flyers/posters Specialist papers Press release 	<ul style="list-style-type: none"> Added onto Homes for Londoners website Registered Providers website Rightmove/Zoopla or similar 	<ul style="list-style-type: none"> Facebook X LinkedIn 	<ul style="list-style-type: none"> Special events in LBRuT Road shows Local Radio YouTube

15. Cascade information requirements

15.1. The Council recognises that on rare occasions it may not be possible to successfully market intermediate housing to households living or working within LBRuT. Under such circumstances, applications from qualifying households who do not live or work in LBRuT may be sought – this is known as cascading.

15.2. Cascading is permissible where an RP has marketed for a period of no less than 3 months after the practical completion date specifically targeting households that live or work in LBRuT but has been unsuccessful in selling or letting all or their properties. The RP must then meet with the Council to discuss cascading arrangements. The Council will respond within 2 weeks of the date of the meeting, assuming all information as listed in paragraph 15.4 have been provided.

15.3. RPs are asked to provide the Council with the following information which helps to capture key trends as well as aid the cycle of continuous improvement in relation to the marketing of intermediate housing in LBRuT:

Property specification:

- a) Unit(s) address including post code
- b) Name of overall scheme
- c) Unit(s) specification including bed size and floor level
- d) Details of any unusual features of the unit(s) which may make it challenging to sell (if applicable)
- e) Which units, if any, are wheelchair accessible
- f) If any units are resales or relets
- g) Status of scheme: % of units available at the time of cascade

- h) Status of scheme: % of units sold or let at the time of cascade
- i) Status of scheme: % of units under offer at the time of cascade

Marketing activities to date

- j) Details of marketing activities to date
- k) Whether the minimal marketing actions have been completed (see Appendix 1A)
- l) Whether all approved marketing plan actions have been completed
- m) Whether the unit(s) have been marketed for at least 3 months after completion
- n) Details of any additional measures used to market the unit(s)

16. Monitoring: Outcomes and Diversity

- 16.1. Registered Providers (RPs) are expected to produce a monitoring spreadsheet which details outcomes in relation to the take up of intermediate housing. This monitoring spreadsheet should be provided to the Housing Enabling Team after the site has been fully completed, ensuring GDPR requirements are met.
- 16.2. The Council aims to use this monitoring information to help inform policy and support service improvements. The monitoring spreadsheet should give details relating to successful and unsuccessful intermediate housing enquiries. The Council will use the information supplied to help determine if there are different intermediate housing success rates.
- 16.3. Equality and Diversity Monitoring: the Council is keen to ensure that it monitors the take-up of intermediate housing and is able to capture both qualitative and quantitative information relating to Equality and Diversity, along with sales outcomes. The completed monitoring spreadsheet should be returned to:

Housing Enabling Team

Email: Amelia.Brennan@richmondandwandsworth.gov.uk

Appendix 1A – Marketing Checklist

Checklist for Registered Providers

The following actions are considered to be minimum marketing activities relating to small scale developments and provide a quick reference guide to Registered Providers.

Item No	Marketing action required by Registered Providers (general needs units and wheelchair accessible units)	Please delete as necessary
1	Production of scheme brochure/property pack	[Yes] [No]
2	RP contact details including phone number and website appear on all hoardings/billboards associated with scheme	[Yes] [No]
3	Details of scheme appear on RP website/website of channel partner	[Yes] [No]
4	Details of scheme (including resales and relets) appear on relevant websites including Homes for Londoners	[Yes] [No]
5	Details of scheme featured in RP tenants' newsletters and channel partners' newsletters where RP is marketing to tenants of other RPs	[Yes] [No]
6	Basic details of scheme made available to the Council for inclusion in main Council website	[Yes] [No]
7	Details of scheme featured in local newspaper/press e.g., Richmond and Twickenham Times or a press release	[Yes] [No]
8*	(*Wheelchair accessible units only requirement) RPs are expected to liaise with the Council's Housing Enabling Team to ensure that enquiries can be made where necessary with the Specialist Housing Occupational Therapy team and Adult Social Care team.	[Yes] [No]
9*	(*Wheelchair accessible units only requirement) RPs are expected to contact special interest organisations in LBRuT who work with wheelchair users to provide details of wheelchair units	[Yes] [No]

Appendix 1B: Intermediate Housing Marketing Plan Template

Marketing Plan

ONLY to be used for major developments consisting of 10 or more units

1: Contact details	
Please provide organisation name and contact details	
Organisation:	
Address:	
Contact name of Lead Officer:	
Email address:	
2: Marketing plan objective: Summary	
Please use this space to outline the desired results for this marketing plan including what new or renovated intermediate housing products are being planned.	
3: Details of the scheme	
Details of Scheme:	
Scheme address:	
Description of products included:	
Outline of features (such a PTAL rating, proximity to transport links, schools etc.)	
4: Please use this space to give summary of any positive aspects of scheme i.e. Unique Selling Points	
Key features (e.g. includes river access, communal amenity space etc.)	

5: Please use this space to give summary of any negative aspects of scheme i.e. things that may make units challenging to sell	
Constraints (could include lack of nearby transport links etc.)	
6: Wheelchair accessible units	
Does the scheme include wheelchair accessible units?	[Yes] [No]
If YES: please provide details below, e.g. number of units and bedroom sizes.	
7: Resale and relets	
Are any of the units resale or relets?	[Yes] [No]
If YES: please read Appendix 1 and use this space to outline marketing methods to be used for the marketing of resale units	
8: Key criteria: Please use this space to detail which specific marketing methods you will use to market the scheme to those who live and work in the borough.	
9: Direct target marketing: Please use this space to outline the marketing channels you intend to use to target specific customers for example: existing social housing tenants. Black, Asian and Minority Ethnic households, wheelchair users, households with vulnerabilities etc.	
10: Marketing start date (DD/MM/YYYY)	
Please kindly attach a copy of your implementation plan which details key milestones and deadline dates. The completed Marketing Plan should be submitted to: Amelia Brennan, Housing Enabling Officer, via email (Amelia.Brennan@richmondandwandsworth.gov.uk)	