

Housing, Finance and Corporate Services Policy & Scrutiny Committee

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Classification:	Public
Title:	Westminster Housing Strategy consultation responses & analysis on housing targets
Report of:	Julia Corkey – Director of Policy, Performance and Communications Ben Denton- Executive Director of Growth, Planning and Housing
Wards Involved:	All
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Report Author and Contact Details:	Kimberley Hopkins, Principal Policy Officer, Tel: 0207 641 2935 Email: khopkins@westminster.gov.uk Andrew Barry-Purssell, Place & Investment Manager Tel: 0207 641 5662 Email: abarrypurssell@westminster.gov.uk

1. Housing Strategy consultation

- 1.1 The consultation period ran from 2nd June until 31st July and responses were accepted up to two weeks after the closing date. During the consultation period officers attended twelve meetings with stakeholders to promote the consultation and to gather views.
- 1.2 Links to the draft strategy and the summary document were sent out to over 400 stakeholders including: registered providers, health professionals, business representatives, developers, think tanks, the GLA, housing applicants, and resident and neighbourhood groups.
- 1.3 Stakeholders were able to respond to the consultation face to face at meetings, by post or electronically via a dedicated email address. The strategy asked a number of specific questions about the proposals and consultees were invited to answer these, or to comment on any other aspects of the strategy, or on areas they thought should also be included.

All consultation documentation was available online via the council website, and in hard copy as appropriate and required.

2. Responses to the consultation

- 2.1 An overview of the responses received is given at Appendix 1 to this report. The consultation received 57 responses – over half of which were from residents or resident groups. Although not receiving comprehensive support from all consultees, there was general support for the objectives set out in the draft Housing Strategy.
- 2.2 In particular consultees were generally supportive of the proposal to increase the intermediate sector and for identifying types of people based on profession who should be prioritised for intermediate housing. There was also support for allocating a small proportion of social units to low income working families who wouldn't ordinarily have priority.
- 2.3 Some respondents criticised the target for affordable housing delivery in the Strategy as being unambitious and there were concerns that not enough affordable housing is being planned for or sought. The housing associations responding, however, were more likely to consider the target realistic. Some suggestions were made for ways in which delivery could be increased (development of brownfield land, increasing densities and building taller, for example). The question over delivery of affordable housing out of the borough received mixed responses. However a large proportion of consultees were pragmatic in their response about the challenges Westminster face.
- 2.4 There was overall support for estate renewal and for wider regeneration to improve local business infrastructure, retail offer and public realm. There were mixed views about retention of City West Homes as the housing management provider, and some residents made negative comments about aspects of their operation (communication with residents, meeting the needs of leaseholders and major works were among the specific concerns mentioned). There was also support for using council/estate offices to provide a range of integrated services and for housing associations to have a local presence.
- 2.5 The lack of reference to the private rented sector was raised by many consultees. The question of empty properties and the definition of affordable housing in the specific circumstances of Westminster were also raised as matters that should be covered.
- 2.6 There was recognition that the Strategy was published before the government's housing policy announcements in the Queen's Speech and Summer Budget.
- 2.7 The various housing policy announcements made by Government in the Queen's Speech and Summer Budget and the anticipated publication of

the Housing Bill that was announced in the Queen's Speech later this autumn mean that it is not practical to publish a finalised Housing Strategy to the originally planned timetable. Given this, , the Cabinet Member has agreed that a "direction of travel" statement should be published highlighting the themes and general approaches the council will be taking until it is in a position to produce a strategy.

3. Housing targets

3.1 This section seeks to answer the questions asked by the Committee about how the targets for affordable housing in the draft Strategy have been developed, and why they are presented in the way they are. As background to this it starts by explaining how Westminster (and other London boroughs) develop policies for:

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- The **total amount of housing** that should be delivered;
- within that, **the amount of affordable housing** that should be delivered; and

within *that* the proportions of **different types of affordable housing** that should be delivered.

The context

3.2 In its National Planning Policy Framework (NPPF) government sets the starting point for boroughs as seeking to meet total housing need in their area for both affordable and market housing. But the other policies in the NPPF also have to be taken into account – for example how much is physically deliverable; the resources available to fund affordable housing; policies on sustainable development; meeting the development needs of business and economic development; and protection of the historic environment. In particular, the NPPF says that local plans should be aspirational, but realistic and deliverable, with particular reference to the effects policies might have on development viability across the authority's area.

3.3 The NPPF also says that planning policies should draw on evidence in two documents:

- A **Strategic Housing Market Assessment (SHMA)** identifying each area's housing needs - the scale and mix of housing the area is likely to need given likely changes in population (including migration), breaking this down by types of housing (including affordable housing and provision for groups like families with children, older people, people with disabilities and service families).

- **A Strategic Housing Land Availability Assessment (SHLAA)**

identifying the amount of land that will realistically be available, viable and developable to meet the identified need for housing.

- 3.4 We also have to take account of the **Mayor of London's "London Plan"**. This sets strategic targets for housing delivery with which Westminster's own City Plan has to be "in general conformity". These include overall targets for each London borough for delivery of all types of housing. It also requires boroughs to set an overall target for affordable housing (as a number or a percentage of all housing delivered) and separate targets for social/affordable rented and for intermediate housing.

London Plan housing targets

- 3.5 The most recent London Plan targets were formally published in March 2015 drawing on London-wide evidence of need and land availability. The targets are:
- For an annual average of at least 42,000 additional homes across London. The target for Westminster 2015-2025 is a minimum of 10,677 homes (giving an annual benchmark of 1,068 homes).
 - For at least 17,000 more affordable homes per year London-wide.
 - For 60% of the affordable housing provision to be social/affordable rent and 40% for intermediate rent or sale.
- 3.6 The London SHMA sets out evidence about London-wide housing need looking forward to 2035, drawing on the demographic and economic trends in London and developments in the housing market. There is particular uncertainty about future population and household growth at the moment, partly because of the importance of domestic and international migration in London, and partly because of the unpredictability of the rate at which new households will grow. In recent years the rate at which people move into London from the rest of the UK has increased, while out-migration has decreased (net domestic out-migration fell from 100,000 pa at the start of the 2000s to 50,000 in 2012); while there are signs that out-migration has started to pick up again as the economy has recovered the trend is difficult to predict. This uncertainty meant that the Mayor looked at three different population scenarios in developing his most recent targets, using the central one to support the London Plan. This shows London's population growing to around 10.1 million by 2036 (an annual increase of 76,000 pa), with growth in the number of households by around 39,500 pa. Taking account of the need to clear backlog need, it estimates an annual housing need in London of 48,841 homes which includes need for 25,624 affordable units of affordable housing.
- 3.7 The London SHLAA is prepared by the GLA in discussion with each London borough. It establishes how much land is available for housing in London and how much can be built on each identified site. It covers sites of 0.25 hectares and larger and makes assumptions about the numbers of

units that can be provided on smaller sites. Sites were identified by the Greater London Authority, by boroughs and by landowners and developers in response to a public “call for sites”. For each, potential constraints on development are identified and assumptions made about the timescale over which housing will be delivered. Housing potential is estimated based on public transport accessibility, London Plan standards of development density, London and local policy constraints and development viability.

- 3.8 Taking account of large sites, small sites, returning long-term vacant housing to use and student non-self-contained accommodation this found total capacity across London for 423,887 new units 2015-25. For Westminster the figures were:

Large Sites	4960
Small Sites	4667
Long-term vacants returning to use	1050
Non-self-contained student accommodation	0
TOTAL	10,677

- 3.9 The London Plan housing targets are based on developing all of the sites identified in the London SHLAA. This approach, recognising the very high level of demand compared with the availability of land to meet it, has been taken since the first London Plan was published in 2004.

Setting targets for Westminster

- 3.10 Westminster’s housing delivery policies are based on the London SHLAA and housing market assessments commissioned by the City Council. Our housing need evidence base is drawn from a [Local Housing Market Assessment \(LHMA\)](#) – which followed the approach set out in national planning guidance – and a Housing Market Analysis which has taken account of factors like the importance of migration and the effect this has on demand for housing that make the national approach less effective in Westminster. It also provided a “sense check” of the LHMA findings against housing market trends like demand for homes of different sizes. These documents both used the Mayor’s “Central” population projections – for Westminster an annual increase of 740 households between 2011-2036 which translates into a need for 1,100 new dwellings each year 2011-2016 and 800 pa 2016-21 (these include provision making up for past under-provision). The total need for affordable housing is 420 units pa. By comparison, over the past 10 years an annual average of 764 new homes have been completed in Westminster (excluding non-self-contained units and vacant homes returned to use); of these 183 (24%) have been affordable.
- 3.11 There is a range of factors other than need that have to be taken into account in going on to set targets. In addition to viability and the resources likely to be available to fund affordable housing, account has to be taken of

the other demands on land that the council has to plan for – such as the additional 655,000 sqm of office space that employment growth will require and the 604,000 sqm of comparison retail space likely to be required in the West End. Policy considerations like international, regional and local heritage designations (including the Westminster world heritage site and protected views of and across the city) also have to be taken into account.

- 3.12 For affordable housing, need is based on an assessment of how many people will be unable to afford to meet their housing needs in the market having regard to prices and incomes and draws on evidence sources like the Council's housing waiting list. The current stock of affordable homes is subtracted from this figure to give the future requirement. The Housing Market Analysis suggested a total need for affordable housing of 422 units per year for the next twenty years, split between the types of affordable housing – 180 units of social housing pa and 240 intermediate (detailed tables from the Housing Markets Analysis showing in detail how the estimates are developed are given in Appendix 2 to this paper). National guidance requires that in setting targets the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments.
- 3.13 Taking all of this into account the housing targets that are being considered to underpin both the Housing Strategy and the City Plan are:
- The annual overall target of at least 1,068 set by the London Plan.
 - For affordable housing, given current levels of funding (and likely future constraints) and the high value of land, the 250 pa target included in the Housing Strategy. This represents a 37% increase over historic delivery.

Question 1: Why are affordable housing targets expressed by tenure?

- 3.14 The National Planning Policy Framework defines the types of housing that can be treated as “affordable” for planning purposes. These are available to different groups of eligible households defined by the council with regard to local incomes and house prices:
- Social rented housing, for which rents are set nationally
 - Affordable rented housing, intended to be let to households eligible for social rented housing at rents not more than 80% of local market rents.
 - Intermediate housing, for sale or rent, provided at a cost higher than social rent but lower than market levels.
- 3.15 It is because these types of housing are aimed at (and suitable for) different types of household with distinct housing needs that separate targets are set for social/affordable rented housing (aimed primarily at those on the lowest incomes or benefits) and intermediate (currently aimed at households with annual incomes of £18,000-£66,000 (or £80,000 for family homes)). As explained earlier, in London Plan Policy 3.11 the Mayor requires boroughs

to set overall affordable housing targets and separate ones for social/affordable rented housing and intermediate.

Question 2: Modelling undertaken on the impact of different social/intermediate housing ratios in new developments

- 3.16 The proposal within the housing strategy to require more intermediate than social housing in new housing developments which come forward was based on the independent assessment of Westminster's housing market in the Market Housing Assessment (HMA). The independent HMA explains that the intermediate tenure currently makes up just 1% of all households in Westminster (compared to 26% social rent) and that there is a demand for 1,300 intermediate homes over the next five years (compared to 1,180 social homes over the next five years). There are 4,470 applicants on the Waiting List and 3,769 on the Intermediate Housing Register.
- 3.17 The HMA pointed out that for the reasons already explained delivery on a scale necessary to meet identified need for social and intermediate housing given current funding mechanisms is impractical – although there is a clear need to maximise delivery of all types of affordable housing. It also highlights the need to address the broad range of need for housing in Westminster, including low to middle income households. Statutory responsibilities the council has to house certain types of household in need in the social sector means that there is limited scope to consider any other type of housing need through social rented housing. The intermediate sector, on the other hand, provides greater flexibility over the type of household which can be offered a property. In particular, it would allow the council to help households on lower incomes - including people vital to running the city's businesses and public services – who are ineligible for social housing and would otherwise not be able to live in Westminster. Given the rough equivalence in need for social housing and demand for intermediate, and the wide difference in the supply of each, increasing the amount of new intermediate housing coming forward is a pragmatic response.
- 3.18 In the past ten years 24% of housing completions have been affordable as defined in the NPPF. If the overall housing target of 1068 units per year is achieved and 24% is affordable this would result in 256 new affordable units being built each year. If we require 60% of these new affordable homes to be social this would result in 154 new social homes compared to 102 intermediate homes (40% of all new affordable units). If, as the Housing Strategy suggested, the ratio were to be flipped, so 60% of all new affordable units were required to be intermediate then this would mean that 154 homes would be intermediate and 102 social – so there is a potential difference of just 52 units between the two tenures.
- 3.19 The proposal to modify the ratio in this way received a large amount of support from consultees who responded to the Housing Strategy. Consultees recognise the high demand for intermediate housing and the benefits increasing this tenure can bring to Westminster such as allowing

low paid workers to live in the city, creating diversity of residents, benefits to the local economy and improved funding for affordable schemes.

4. Financial Implications

4.1 None

If you have any queries about this Report or wish to inspect any of the Background Papers please contact: Kimberley Hopkins, telephone 020 7641 2935, email khopkins@westminster.gov.uk

BACKGROUND PAPERS:

1. Full summary of responses to the Westminster draft Housing Strategy (attached at appendix 1)

Appendix 1: Full summary of responses to the Westminster draft Housing Strategy

This report covers:

Section 1 Details of who responded

Section 2 Details of meetings attended to discuss the strategy

Section 3 A summary of comments on each theme of the strategy

Section 4 Comments on topics which should be included in the strategy

Section 1: The consultees

- 1.1 The Housing Strategy consultation received 57 responses from individuals and organisations. The types of respondents are shown in table 1 below. The GLA and DCLG did not respond at this stage.

Table 1: Breakdown of responses	
Respondent type	No. of responses
Residents or individuals	21
Resident or neighbourhood groups	9
Housing associations or housing management providers	8
London Boroughs	6
Charities	6
Internal to Westminster Council (including Councillors)	5
Developers	1
MPs	1
TOTAL	57

Section 2: Meetings attended to discuss the strategy

2.1 Officers attended a number of meetings to discuss the strategy:

	Meeting	Attendees
1	Policy & Scrutiny Committee	Mix of councillors and developer/housing association witnesses
2.	CityWest Board pre meeting	Mixture of residents, councillors and independent reps
3.	CityWest managers	Mix
4.	Service Improvement Group	People in temporary accommodation and some council tenants affected by overcrowding
5.	CWH Strategic Committee	CityWest resident representatives
6.	Westminster Residents Panel	Social housing tenants and leaseholders in Westminster (including some housing association tenants)
7.	Cardinal Hume Centre	People using the service – from a mix of tenures
8.	Housing Association Chief Executive Group	Registered provider Chief Execs or nominees
9.	Health and Wellbeing board	Mix
10.	Community Network	Voluntary organisations operating in Westminster
11.	Church Street Futures Steering Group	Local residents and councillors
12.	Westminster Advice Forum	Advice agencies – mainly voluntary sector

CHAPTER 1: HOMES

Question 1. *Do you think our target of 1,250 new affordable homes over 5 years is reasonable? Do you have any ideas about ways we could boost delivery even further?*

Overall more consultees disagreed with the target than supported it; mostly on the ground that it was not high enough (although some thought it was undeliverably high. Most housing association respondents supported the target. There were also many comments about the planning system not delivering more affordable housing in new developments, a point also made at a number of the meetings. Comparisons to other London Boroughs' targets and approaches to affordable housing delivery were made. Some respondents made suggestions about how delivery could be boosted (e.g. development of brownfield land, increasing densities, taller buildings).

Question 2. *Do you agree we should focus on growing the intermediate sector in Westminster and focus on developing more products for people with lower incomes?*

There was more support than opposition for this proposal. Some consultees highlighted the benefits it could bring. Reasons for not supporting it centred on the effect it might have on supply for vulnerable people. Some consultees expressed caution that the homes would be genuinely affordable and that they would benefit the right people.

Question 3. *What are the characteristics of an intermediate home or housing product that households in this sector most need?*

There was a general view that products should be affordable to lower income and middle earners. There was a lot of interest at the meetings about how affordable intermediate housing would be, whether it would be a rented product and who it would be for. Intermediate rent was generally supported and there was interest in whether tenancies would offer long-term security or be fixed term.

Question 4. *Are there any groups of workers that particularly need to work in Westminster and should have higher priority? If so, why?*

There were many different views and suggestions on who should be prioritised – the most common response was that people working in the public sector and service industry should be supported. However there was also a view that households should not be prioritised on the basis of employment type. This opinion was echoed at the consultation meetings where people commented that workers that did not live in Westminster should not be supported as there were good transport links into the City.

Question 5. *What is the best approach to ensuring that receipts from disposal of affordable properties in Westminster are re-invested in Westminster? Is it more important to ensure the London-wide supply of affordable homes is increased?*

There was much support for disposal receipts being re-invested in Westminster but also a view that this was hard to achieve practically and that a pan-London approach to housing delivery would increase supply. This support was often qualified by concerns about concentrations of social housing being created.

Question 6. *Do you think Westminster should be using its resources to deliver homes outside the borough boundaries?*

Views were mixed, with almost equal support and opposition. Most of the opposition came from residents or members of residents' groups, while most of the support came from housing associations. There was a view amongst some that it is better to move into a secure tenancy in outer London than wait for many years in temporary accommodation for a home in Westminster. There were also mixed views at the meetings – while there was often a view that a new approach was needed – the need for strong local communities was also emphasised and that people (particularly the elderly) needed to live near to care and support networks.

Question 7. *Do you agree that we should continue with our current housing management model, and retain CityWest Homes as our housing management provider?*

Support and opposition for retaining CityWest Homes was fairly equal, however there were a number of negative comments about CityWest as a housing management provider – these mainly came from residents.

Other comments not relating to the questions:

Housing management

Suggestions for improvements included:

- sharing more services with smaller housing associations;
- co-locating services ;
- improving resident engagement – perhaps the drawing up of a 'residents' charter';
- training front-line staff to offer broader care and support to customers;
- introducing damp and cold as a performance indicator.

CHAPTER 2: PEOPLE

Question 1. *What do older people want and need in terms of housing in Westminster?*

The general view was that older peoples housing should include a range of provision and services alongside it to provide for social interaction as well as just a home. It was also felt that studio accommodation is not appropriate and that the strategy should also recognise that not all older people need care and should consider their wider housing needs and a range of housing products/tenures to match. There were concerns raised about younger members of families having to move away from the older generation because of the cost of housing and suggestions for multi-generation housing to be developed as part of estate renewal.

Question 2. *How can housing services best help to reduce the burdens on adult social care and health services?*

A number of improvements were suggested to the housing stock such as improving energy efficiency and installing high speed broadband. A joint approach to preventing the need for care services was strongly supported by Adult Social Care. Residents that responded emphasised the need for families to stay close together and for older people to stay in their own homes for as long as possible.

Question 3. *Are there better ways to address London's homelessness problem?*

Charities, housing associations and other London Boroughs tended to support a London-wide debate on the issue and there was recognition that the current system didn't work well. A number of suggestions were made about how to address homelessness such as making use of vacant and empty homes.

Question 4. *What is the best ways of getting people's views about housing policies?*

A variety of methods were suggested, but face to face consultation received the most support. The importance of early consultation and involvement was also emphasised. There was also a view that consultation could be more extensive, in plain English and that it should be advertised in more public areas e.g. GP surgeries and libraries.

Other comments not relating to the questions:

Overcrowding

There is a proposal in the strategy on overcrowding but not a direct question. Some consultees felt that letting just 60 units a year to overcrowded households is too low and that the problems with overcrowding in Westminster are hindered by: the failings of housing associations; the system of prioritisation which should be revised so that length of time on the waiting list is given a higher priority; and too many small units being built. Solutions such as the sale of smaller units to fund delivery of larger ones and introduction by housing associations of space for homework clubs (to alleviate the problems children face in crowded homes) were welcomed.

Housing quality

The proposal in the strategy to address damp and cold in council homes were generally welcomed, although some consultees would have liked it to provide more detail about how it will be implemented. Pressure by the council on housing associations and private landlords to address damp and cold and other quality issues in their own stock was suggested. There was a view that the strategy was too focused on the social sector and that many vulnerable residents are at risk from poor quality housing in the private rented sector too. Some consultees would like to see the council lobbying government for more energy efficiency funding.

CHAPTER 3: PLACES

Question 1. *Are there any estates that you would suggest for inclusion in the future estate renewal programme?*

Overall there was support for more estate renewal and also support for wider improvements beyond housing supply. A number of estates/locations were suggested for renewal:

- Churchill Estate
- Millbank Estate
- Lillington Estate
- Ebury Bridge Estate
- Harrow Road
- Victoria Fire Station
- Queen's Park (for intensification)
- Brunel Estate

Question 2. *Involving residents in estate renewal plans*

Responses mainly came from residents and housing associations. A variety of approaches were recommended, overall face to face consultation was supported the most, along with wider advertising of consultations.

Other comments not relating to the questions:

Use of council buildings and housing associations having a local presence

These proposals were generally supported at the meetings. However some (particularly housing association) respondents made the point that having a local physical presence was against the general direction of travel of moving to a more self-service approach among registered providers.

Partnership working

Where it was addressed, the preferred partner approach suggested was welcomed. There were suggestions that the Council could join forces with neighbouring boroughs to develop a preferred partner scheme as many housing associations work across boundaries.

CHAPTER 4: PROSPERITY

Question 1. *What other approaches could we consider to help address long-term unemployment and help local people access the economic opportunities in the West End?*

Some respondents thought the topic did not belong in a housing strategy while others welcomed its inclusion. Consultees criticised the Strategy for not being clearer on what sort of people would be helped into employment. Partnerships with other services,

organisations and established charities were suggested to solve long-term unemployment.

Question 2. *Should we allocate some social housing to low income working households that wouldn't ordinarily have priority? If so, what should be taken into account when deciding when to do this?*

Although there was some concern however about how the homes would be allocated and who would have priority, there was supported for this proposal. Some consultees considered that this would be unjustifiable in the face of such high need for social housing.

Section 4: Comments on areas not included in the strategy

National policy changes

A number of consultees commented on the announcements and suggest the final strategy is not published until the full impact is known. There is a lot of concern about the changes and their impact particularly on Westminster's social mix.

Private rented sector

The lack of reference to the private rented sector was commented upon by many consultees and at three of the consultation meetings. It was felt that the draft strategy is too focussed on social housing and given that the council discharges its duty to some residents on its waiting list by placing them in the private rented sector, and because of the sheer size of the sector in Westminster, it merits reference in the Strategy. Respondents pointed out that users of social housing experience similar problems to those in the private rented sector and suggested that a private renter's forum could be set up to enable clear dialogue with renters across the city.

Some respondents thought the strategy should address high deposits and letting agency fees (proposing that the council might act as a guarantor), tenancy length and standards of accommodation. There was also a view that the London Rental Standard and London Landlord Accreditation Scheme should be promoted by the Housing Strategy.

Empty homes

Some consultees felt that the number of empty homes, or homes bought as an investment and then left empty is unacceptable and should be addressed. It was suggested that the council should lobby for the disclosure of empty property ownership; owners of properties which are not occupied should be penalised financially; the properties used as temporary accommodation for those on the waiting list; and incentives offered to bring empty properties back into private use. Some consultees strongly opposed "buy-to-leave investments" and thought that the council should prevent off-plan sales to foreign markets.

Definition of affordable housing

Some consultees considered that the Strategy should be clearer about what is meant by 'affordable housing' and, in particular, about what 'affordable' means in a Westminster context. There was a lot of interest in the cost of affordable housing at the meetings.

Appendix 2: Estimates for social and intermediate housing need

1. Estimate of the Annual Need for Social Housing Over 20 Year Period

		Per annum 2015-35
A	Backlog excluding transfer tenants	135
B	Newly arising need (on the basis that 30% of new households need subsidised rent reflecting current 25% population on Housing Benefit plus an estimated 5% to reflect numbers placed outside the borough)	272
C	Newly arising need (on the basis that 89% need subsidised rent based on modelling in Housing Market Assessment)	712
D	Mid-point newly arising need (average of B+C, to take account of different methodologies used in the two reports)	492
E	Existing households falling into need (net growth in waiting list)	166
F	Supply (excludes transfers but includes supported housing)	610
G	Shortfall (A+D+E+F)	183

2. Estimated Annual Demand for Intermediate Housing

		Per Annum 2015-35
A	Current demand: Intermediate Waiting List (households living in Westminster only)	91
B	Newly arising need – new households: GLA household projections x 23% (estimate based on % of Westminster households 'stable' in private rented sector and not on Housing Benefit – this is used as a proxy for intermediate families. "Stability" is derived from population turnover)	183
C	Supply: Average number of re-sales or re-lets of intermediate housing over last 3 years	32
E	Shortfall: A+B-C	242

Source for both tables: Westminster Housing Market Analysis: Final Report (December 2014)