Housing Select Committee				
Title	Allocations Policy Review – results of consultatuion			
Key decision	No Item no 6			
Wards	All			
Contributors	Executive Director Customer Services			
Class	Part 1 16 <sup>nd</sup> November 2016			

# **Reasons for lateness and urgency**

This report is late due to a problem relating to reporting accurate equalities data from the Allocations database to inform the Equalities Analysis Assessment, which had to be rectified by the supplier. It is urgent as there is no other opportunity for Committee to consider this report prior to it being presented to Mayor and Cabinet at its meeting on 7 December.

# 1 Purpose of report

- 1.1 In January 2016 Housing Select Committee received a report outlining proposed changes to the Council's Allocations Policy. On 2 May 2016 Mayor and Cabinet agreed that officers should consult with residents and partners about the proposed changes. The consultation opened in August and concluded on 4 September 2016.
- 1.2 This report presents the results of that consultation, to allow Housing Select Committee the opportunity to scrutinise the proposed changes in light of the results of the consultation prior to these being presented to Mayor and Cabinet in December.

# 2 Summary

- 2.1 Demand has increased significantly over recent years means whilst the number of homes for social rent – either new build or re-lets – has reduced over recent years. Between 2010/11 and 2015/16 the number of households in temporary accommodation increased by 89% and over the same period there was a 39% reduction in the number of available lets.
- 2.2 There is increased demand for housing in a context of reducing supply. The council has taken a number of steps to address this challenge, including building new Council homes for the first time in a generation, so that the Council is directly providing new homes for social rent itself. The Council also continues to work in partnership with Housing Associations and other developers to build new homes

in the borough.

- 2.3 In this context, Lewisham's Allocation Policy sets out how we will allocate households as fairly and efficiently as possible to the properties that become available to the Council. It sets out the principles of how we will do this and how we will make sure we comply with legislation and court rulings in this area.
- 2.4 Demand for social housing remains far higher than the supply available to the Council. The Allocations Policy was last reviewed in detail in 2012. Since that review, the number of households on the waiting list has grown from approximately 7,800 to over 9,300. Lewisham has also seen an increase in homelessness, with the number of households living in temporary accommodation increasing from less than 1,000 in 2010/11 to over 1,750 as at September 2016.
- 2.5 For these reasons, Mayor and Cabinet considered a number of proposed changes to the policy in order to help manage demand and bring the policy into line with other London Boroughs and DCLG guidelines. The proposed amendments are presented in this report, including analysis of the outcome of the consultation and a summary of comments provided by respondents.

### 3 Recommendations

3.1 It is recommended that Housing Select Committee notes and scrutinises the proposed changes to the Allocations Policy in light of the results of the consultation, and provides commentary prior to the presentation of this report at Mayor & Cabinet on the 7<sup>th</sup> December.

# 4 Policy context

4.1 The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Sustainable Community Strategy policy objectives:

• Ambitious and achieving: where people are inspired and supported to fulfil their potential.

• Empowered and responsible: where people can be actively involved in their local area and contribute to tolerant, caring and supportive local communities.

• Healthy, active and enjoyable: where people can actively participate in maintaining and improving their health and well-being, supported by high quality health and care services, leisure, culture and recreational activities.

# 4.2 The proposed recommendations are also in line with the Council policy priorities:

• Strengthening the local economy – gaining resources to regenerate key localities, strengthen employment skills and promote public transport.

• Clean, green and liveable – improving environmental management, the cleanliness and care for roads and pavements and promoting a sustainable environment.

- 4.3 It will also help meet the Council's Housing Strategy 2015-2020 in which the Council commits to the following key objectives:
  - Helping residents at times of severe and urgent housing need
  - Building the homes our residents need
  - Greater security and quality for private renters
  - Promoting health and wellbeing by improving our residents' homes

# 5 Background

- 5.1 Housing Allocations schemes are governed by legislation which requires housing authorities to determine and publish an allocations scheme setting out how it will prioritise applications for social housing. The relevant area of legislation is Part 6 of the Housing Act 1996, which sets out the parameters for the allocation of housing accommodation. In this context, this refers to the allocation of social housing to which the Council has nomination rights. It does not cover how the Council allocates to other types of accommodation, such as temporary accommodation for homeless households.
- 5.2 It is a requirement that certain groups are given "reasonable preference" within the policy. These groups include:
  - People who are homeless within the meaning of Part 7 of the Housing Act 1996
  - Those living in unsatisfactory housing, e.g. overcrowded or lacking amenities
  - Those who need to move on medical grounds
  - Those owed a duty under other relevant legislation such as a closing order on a property.
- 5.3 Allocations scheme must give preference to these groups above others. There is no requirement to give an equal weighting to all of the reasonable preference categories.
- 5.4 A key element of the allocations scheme is the Annual Lettings Plan which should be agreed by Members each year. This outlines the distribution between applicants with differing needs of the supply of lettings expected over the coming year. The proposed Annual Lettings Plan for 2016/2017 was approved by Mayor and Cabinet on 18<sup>th</sup> May 2016.
- 5.5 Lewisham extensively reviewed its Housing Allocation Scheme in 2012 in response to changes in legislation introduced by the Localism Act, as well as the changing trends in the supply and demand of social housing. These changes were approved by Mayor and Cabinet on 20th June 2012. The changes made as part of that review included the deletion of band 4 to reflect that the reduction in the number of lets meant that people in this band were extremely unlikely to receive an offer of social housing. In 2012 the local connection rule was also introduced which meant that an applicant had to have been a Lewisham resident for two years in order to qualify to register.

- 5.6 The proposals outlined in this report are designed to further ensure that the Council is able to continue to best allocate our supply of social housing and manage demand fairly within the challenging housing context where demand has increased by 90 per cent over the last five years whilst supply has decreased by 40 per cent, ensuring the policy manages the expectations as well as meeting the needs of service users, that it reflects the demands on the service and fosters good working relations with our partners.
- 5.7 At its meeting in January 2016, Housing Select Committee considered the proposed changes and made the following comments:
  - It should be clarified in the report whether any of the proposed changes apply to people who are on the housing register under section 6 of the Housing Act, section 7 of the Housing Act or whether the changes would apply to both.
  - It should be clarified in the report whether the limited offers rule of one offer (paragraphs 6.9 and 6.10) and the limited offers rule of three offers (paragraphs 6.18 and 6.19), applies people who are on the housing register under section 6 of the Housing Act, section 7 of the Housing Act or whether the changes would apply to both.
  - It should be clarified in the report that the rent arrears rules (paragraphs 6.16 and 6.17) only refer to people that have current rent arrears, and not to people who have ever had rent arrears that have since been cleared.
  - It should be clarified under the section for bedroom standard (paragraphs 6.20 to 6.22) that any proposed changes allow exemptions for people with medical and/or special needs.
  - It should be highlighted in the report that there is the possibility that temporary accommodation provided outside the borough can become permanent if it is fit for purpose so people are aware of this possibility.
- 5.8 Clarification around these points has been provided in section seven where the proposed changes are further outlined.
- 5.9 The Allocations Scheme governs how the Council allocates to social housing properties which become available for let. Offers of Private Rented Sector (PRS) accommodation are governed by the PRS Discharge Policy. A revised PRS Discharge Policy was considered by Mayor and Cabinet on 19 October 2016 and will be the subject of separate consultation. This is due to commence imminently, and the results will be brought back to Housing Select Committee early next year.

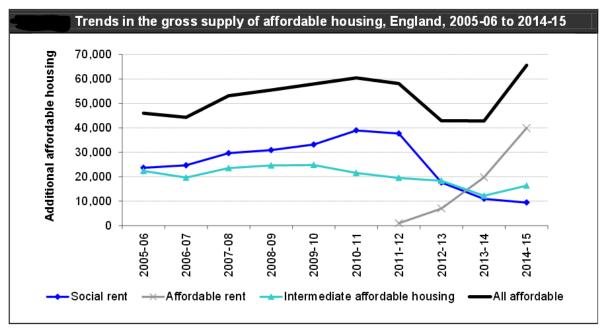
# 6 Housing supply and demand

6.1 Housing Select Committee have received a number of reports over the past years about the increased housing demand in the borough alongside the reduction in the supply of new homes for social housing and re-lets.

6.2 As of September 2016, there were over 9,300 households on Lewisham's housing register, an increase of over 1,500 since 2012. In the same period, the number of lets has reduced from over 1,500 per year to just over 1,100 per year. The tables below set this out in more detail:

2012/13	Total Lets	1562
	Number on Housing Register	7830
2013/14	Total Lets	1219
	Number on Housing Register	8294
2014/15	Total Lets	1158
	Number on Housing Register	8442
2015/16	Total Lets	1138
	Number on Housing Register	9058

- 6.3 Lewisham has also seen an increase in homelessness, with the number of households living in temporary accommodation increasing from less than 1,000 in 2010/11 to over 1,750 as at September 2016. This increased number of households in high housing need has also increased the demands on the service.
- 6.4 Based on the number of lets as at September 2016 and the number of households on the housing register as at September 2016 it would take over 4 and a half years to let a studio or one bedroom property to everyone on the register, over 9 years to let a 2 bedroom property to everyone on the register, just under 11 years to let a 3 bedroom property to everyone on the register and over 18 years to let a 4 bedroom property or larger to everyone on the register. This does not account for any new applicants joining the register.
- 6.5 Government policy over the past five years has meant that fewer homes for social rent have been built. In particular, changes in the amount of grant available had a significant impact on the tenure of new affordable housing. Whilst there was an increase in housing for social rent due to the 2008-2011 National Affordable Housing Programme, the 2011-15 programme resulted in a dramatic decrease in the amount of social rented housing completed, as shown in the chart below. There was a concurrent increase in the number of new homes for 'affordable rent'.



Source: DCLG, Affordable Housing Supply: April 2014 to March 2015 England

6.6 The last government announced a further series of policies which are likely to further reduce the number of properties available for social rent. Therefore the supply of new social homes beyond the Council's own programme and those provided by some Housing Associations is likely to remain low, which means that the ability to meet demand will remain challenging.

# 7 Proposed changes and summary of consultation responses

- 7.1 The proposed changes are intended to help manage the growth of the housing waiting list within this context of housing demand increasing whilst supply reduces. To that end, the main proposed change is to increase the local connection rule from two years to five years. As this is intended to slow the growth of the waiting list, it would only apply to new applicants and will not affect those currently on the register. It will also not affect a household which approaches the Council to make a homeless application, as this is governed by separate legislation.
- 7.2 The other proposed changes aim to improve the operation of the policy, as well as incorporate changes in regulations and guidance which have been issued by the government since the policy was last reviewed.
- 7.3 The consultation opened in August and concluded on 4 September 2016 and was carried out using the council's online consultation tool and was promoted on the website and with key housing partners. 144 responses were received. Respondents were asked to give detail of the context in which they were responding to the consultation. The breakdown of responses to this is given below.

Social housing tenant/applicant	41 %
Housing Association	21%

Charity or Voluntary Organisation	2%
Local Authority employee	24%
Landlord	1%
Other	10%

7.4 A detailed analysis of the consultation and its recommendations is available as Appendix 1.

Local Connection

- 7.5 In order to qualify for social housing in the borough, an applicant must demonstrate that they have a local connection. Currently, this means that they must be resident in Lewisham and have been resident for a period of two years.
- 7.6 It is proposed to increase the Local Connection criteria to five years to help manage demand for the service as well as the expectations of service users. This is also in line with partners in the South East London Housing Partnership (Southwark, Bexley, Greenwich and Bromley), creating geographic consistency.
- 7.7 This proposal will affect all new Part 6 applicants to the Council's general housing register, but will not affect those currently on the register. It will also not affect households making a homeless application under Part 7 of the Housing Act 1996.
- 7.8 Over 68% of respondents either agreed or strongly agreed with this proposal, whilst fewer than 20% disagreed. It is therefore proposed that officers proceed to recommend that this change to the policy is made.

### Bedroom standard

- 7.9 It is proposed to adopt the Department for Communities and Local Government's guidance bedroom standard when determining the number of bedrooms required by an Applicant. This has been designed to take into account Housing Benefit regulations regarding bed sizes. The Bedroom Standard allocates a separate bedroom to each:
  - married or cohabiting couple
  - adult aged 21 years or more
  - pair of adolescents aged 10-20 of the same sex
  - pair of children aged under 10 regardless of sex
- 7.10 The policy will also be amended to note that under existing rules, applicants may be entitled for a home of one size but not be eligible for Housing Benefit at the same level.
- 7.11 DCLG has recommended that all housing authorities adopt the bedroom standard as an appropriate measure of overcrowding for allocation purposes.

- 7.12 The proposed change would allow exemptions for people with medical needs, as set out further in section 7.42 below.
- 7.13 Over 47% of respondents agreed with the changes and over 42% disagreed. Those who disagreed with the changes largely referred to concerns around privacy in their response.
- 7.14 Whilst there is a case for people over 18 to be allocated their own bedroom, the level of demand for larger properties means that requiring more bedrooms could mean that a household has to wait longer to successfully bid for a property. On balance, therefore, officers propose to recommend that this change is made to the Allocations Policy.
- 7.15 This proposal will affect all new Part 6 applicants and transfers to the Council's general housing register. It would not affect homeless applicants where they are allocated temporary accommodation under Part 7 of the Housing Act 1996.

### Rent arrears

- 7.16 Our policy is clear that a household with significant rent arrears at the time of being matched to a property must clear these before they move into a new home. However the way in which our policy is currently worded means that applicants with arrears over four weeks will be suspended. This causes administrative issues and can delay the letting of properties.
- 7.17 It is proposed to simplify this clause by amending section 2.2.4 regarding suspension for significant rent arrears. Where an offer is made in future it will be necessary for the applicant to have a rent account balance of zero as well as no outstanding former tenant arrears. The Housing Needs Group Service Manager will still retain the delegated authority to permit a 'move despite arrears' where necessary.
- 7.18 This proposal will affect all applications at the point at which they are made an offer of social housing under the Council's Allocations Scheme. It would only apply to an applicant with current rent arrears, and not to people who have ever had rent arrears that have since been cleared.
- 7.19 A large majority of respondents agree with this proposed change, with over 72% of respondents strongly agreeing or agreeing, and less than 13% disagreeing.
- 7.20 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

### Right to Move

- 7.21 New statutory guidance was introduced in March 2015 to introduce the 'Right to Move'. The intention behind this was to make it easier for social tenants to move if they need to for work reasons. The implications of the regulation is that local authorities are prevented from applying a local connection test that could disadvantage tenants who need to move across local authority boundaries for work related reasons
- 7.22 It is therefore proposed to introduce a quota ensuring that at least one per cent of all lettings are to households eligible under the 2015 'Right to Move' guidance, to publish the quota as part of the Allocation scheme and to report locally on demand and outcomes through the Annual Lettings Plan. This will build upon the provisions of section 2.2.2 of the Allocations policy which awards a local connection to those who require housing in the borough to be able to work in the borough.
- 7.23 This change would only apply to households eligible under the 2015 'Right to Move' guidance.
- 7.24 Over 71% of respondents agreed with the proposed changes around the right to move and less than 6% disagreed.
- 7.25 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

# Timescales clarification

- 7.26 In certain cases, the Council operates a policy of only making one offer of social housing to an applicant. These are high priority households where it is important that the household is found stable housing quickly.
- 7.27 It is proposed to change the wording of section 2.2.3 in relation to the 12 week period in which Emergency Housing Panel and Supported Housing Priority cases may bid for themselves. The change will reflect that this does not guarantee that an offer will be made or a bid will be successful in that time, and that the actual waiting time for a property may be longer dependent on availability and demand for properties. This will provide more clarity and help to manage the expectations of residents.
- 7.28 This change will only apply to households which are Emergency Housing Panel or Supported Housing Priority cases.
- 7.29 Over 88% of respondents agreed with the proposed clarification of timescales whereas less than 2% disagreed.
- 7.30 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

Clarification of temporary to permanent scheme

- 7.31 Section 3.4.5 of the Policy allows the Council to offer a household in temporary accommodation the home they are occupying on a more permanent basis if the accommodation is suitable and it is possible to do so. Currently this only applies if the household has occupied the accommodation for at least 12 months.
- 7.32 It is proposed to amend the section 3.4.5 of the policy to allow households placed in suitable Temporary Accommodation to be signed up as permanent within as short a timeframe as is possible and appropriate.
- 7.33 Where this is an offer of social housing allocated under the Allocations Scheme, this offer would be to social housing within Lewisham. Offers of accommodation outside of the borough into private rented accommodation would fall under the scope of the PRS Discharge Policy. At the time of this report being submitted, the Council is due to consult on a revised PRS Discharge Policy imminently.
- 7.34 Over 89% of respondents agreed with this change and less than 2% of respondents disagreed.
- 7.35 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

### Facilitate chain lettings

- 7.36 Our current policy encourages 'chain lets' whereby in certain areas a large unit of accommodation household becomes available, and is let to an overcrowded household to improve their situation and the unit that has been vacated is in turn let to another household as requested to enable a further move.
- 7.37 It is proposed to amend the section relating to Chain Lettings to allow properties that become available through this means to be advertised for a specific purpose. This will encourage the best use of the stock, ensuring that the Allocations policy is responsive to the needs of customers and the demands of the service.
- 7.38 Over 76% of respondents agreed with the proposed changes and less than 3% disagreed.
- 7.39 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

### Applications suspension

7.40 Occasionally, some applicants will view a number of properties but not accept the tenancy of any of them. This causes additional cost for the Council and delays a household being able to move into a new home.

- 7.41 Therefore it is proposed to introduce a 'Limited Offer' rule, suspending applications from the register for 12 months where they have rejected three offers and to clarify the policy to note that not attending an accompanied viewing to sign a tenancy that has been offered will be considered a rejection.
- 7.42 This proposal will affect Part 6 housing applications who are not subject to the 'one offer only' policy.
- 7.43 Over 73% of respondents agreed with the proposed changes, whilst under 11% disagreed.
- 7.44 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

### Medical assessments

- 7.45 To clarify that the Council's medical advisor may recommend an extra bedroom on medical grounds.
- 7.46 This proposal will apply to all Part 6 and Part 7 applications.
- 7.47 Over 77% of respondents agreed with the proposed changes whereas under 5% disagreed.
- 7.48 There was clear support for this change in the consultation, so officers propose to recommend that this change is adopted.

### 8 Next steps

8.1 Subject to the comments of Housing Select Committee, officers propose to recommend that the Mayor approves the changes to the Allocations Scheme and agree that officers publish the revised Allocations Scheme.

# 9 Financial Implications

- 9.1 As has been previously reported, the current housing issues experienced both nationally and in the borough are putting severe pressure on the council's housing budgets.
- 8.2 The changes to the allocations policy set out in the report are expected to assist in managing those pressures and assist in officers making the best use of the resources available to them.

# **10 Legal Implications**

10.1 In compliance with section 166A,(1) (of the 1996 Act,) Lewisham Housing Authority has an Allocations Policy, "... for determining priorities,..." which sets out the procedure to be followed when allocating housing accommodation.

- 10.2 The statutory guidance on social housing allocations is entitled "Allocation of accommodation: Guidance for Local Authorities in England and was revised in June 2012 Authorities are obliged to have regard to this guidance when devising and implementing their schemes.
- 10.3 The Government launched a consultation exercise on proposals to issue new statutory guidance "to help local authorities make full use of their new allocation freedoms by tailoring their allocation priorities to meet the needs of their local residents and their local communities." One of the proposals involved amending existing guidance to "strongly encourage all local authorities to adopt a two year residency test as part of their qualification criteria." Consultation closed on 22 November 2013 and new supplementary statutory guidance was published in December 2013: *Providing social housing for local people*
- 10.4 On 9 March 2015 the Government announced an intention to 'ensure local connection requirements do not prevent social tenants from moving into the area to take up work or apprenticeship opportunities.'
- 10.5 The Localism Act 2011 received royal assent on 15th November 2011. The 2011 Act introduces a number of significant amendments to Part 6 of the 1996 Act. Of particular relevance here are the following provisions: Section 160ZA replaces s.160A in relation to allocations by housing authorities. Social housing may only be allocated to 'qualifying persons' and housing authorities are given the power to determine what classes of persons are or are not qualified to be allocated housing (s.160ZA(6) and (7)).
- 10.6 Section 166A requires housing authorities in England to allocate accommodation in accordance with a scheme which must be framed to ensure that certain categories of applicants are given reasonable preference for an allocation of social housing. Section 166A(9) includes a new requirement for an allocation scheme to give a right to review a decision on qualification in s.160AZ(9), and to inform such affected persons of the decision on the review and the grounds for it. This is in addition to the existing right to review a decision on eligibility.
- 10.7 Section 166A(12) provides that housing authorities must have regard to both their homelessness and tenancy strategies when framing their allocation scheme. The requirement for an allocation scheme to contain a statement of the authority's policy on offering a choice of accommodation or the opportunity to express preferences about their accommodation is retained. (s.166A(2)). However, the requirement to provide a copy of this statement to people to whom they owe a homelessness duty (under s.193(3A) or s.195(3A) of the 1996 Act) is repealed by s.148(2) and s.149(3) of the 2011Act. This is because, following the changes to the main homelessness duty made by the Localism Act 2011, there can no longer be a presumption that the homelessness duty will be brought to an end in most cases with an allocation under Part 6.

- 10.8 The European Convention on Human Rights states in Article 8 that "Everyone has 16 the right to respect for his private and family life, his home and correspondence". The Human Rights Act 1998 incorporates the Convention. Whilst it does not, however, necessarily mean that everyone has an immediate right to a home, (because Article 8 is a "qualified" right and therefore is capable in certain circumstances, of being lawfully and legitimately interfered with,) the provision by an Authority of a relevant and considered Allocations Policy does assist to reinforce the Article 8 principles.
- 10.9 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 10.10 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
  - eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - advance equality of opportunity between people who share a protected characteristic and those who do not.
  - foster good relations between people who share a protected characteristic and those who do not.
- 10.11 The duty continues to be a "have regard duty", and the weight to be attached to it is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 10.12 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical quidance be found can at: http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-actcodes-of-practice-and-technical-guidance/
- 10.13 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
  - 1. The essential guide to the public sector equality duty
  - 2. Meeting the equality duty in policy and decision-making
  - 3. Engagement and the equality duty
  - 4. Equality objectives and the equality duty

- 5. Equality information and the equality duty
- 10.14 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <a href="http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/">http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/</a>

# **11** Crime and disorder implications

11.1 There are no crime and disorder implications arising from this report.

# **12** Equalities implications

12.1 An equality analysis assessment of the proposed changes is attached to this report at Appendix 2.

# **13** Environmental implications

13.1 There are no environmental implications arising from this report.

# 14 Background Documents and Report Originator

- 14.1 Appendix 1 Detailed results of consultation
- 14.2 Appendix 2 Equality Equalities Analysis Assessment
- 14.3 The current Allocations Policy is available here:
- 14.4 <u>https://www.lewisham.gov.uk/myservices/housing/find/Documents/Lewisham%</u> 20Housing%20Allocations%20Scheme.pdf
- 14.5 The government has published Allocations Guidance which is available here:

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/5918/2 171391.pdf

14.6 If you have any queries relating to this report please contact Genevieve Macklin on 020 8314 6057.

# Appendix 1 – Detailed response to the consultation

### Local Connection

# **Consultation Responses**

To what extent do you agree or disagree that Lewisham should increase the local connection criteria from two years to five?

Strongly Agree	32.64% - 47 responses
Agree	36.11% - 52 responses
Neither Agree Nor Disagree	10.42% - 15 responses
Disagree	9.03% - 13 responses
Strongly Disagree	10.42% - 15 responses
No Response	1.39% - 2 responses

To what extent do you agree or disagree that Lewisham should increase the local connection criteria, from two years to five?

Table .1				
	Table .2			
		% Total	% Answer	Count
	Strongly Agree	32.64%	33.10%	47
	Agree	36.11%	36.62%	52
	Neither Agree Nor Disagree	10.42%	10.56%	15
	Disagree	9.03%	9.15%	13
	Strongly Disagree	10.42%	10.56%	15
	[No Response]	1.39%		2
	Total	100.00%	100.00%	144

### Agree comments by category

Same as neighbouring	Enables more	Good but no	Will reduce
boroughs which makes	priority for	effect to	waiting list
it fair	Lewisham	residents	
	residents and	moving between	
	builds better	partners?	
	communities		
5	2	1	1

# Disagree Comments by category

No effect on problem of	Will increase	It will increase	Delays
need for housing, just	street	waiting list	inevitable
reduces demand	homelessness		

	/ rough sleeping		homelessness for people
1	1	1	1

# Other Comments by category

Will increase	5 years is too	How will it affect	What about
stay in TA and	long - 3 years	homeless persons	people with
unsuitable	would be a	leaving institutions	no local
accommodation	compromise?	who have	connection?
		previously lived in	
		Lewisham?	
2	1	1	1

Over 68% of respondents either agreed or strongly agreed with this proposal, whilst fewer than 20% disagreed.

# Bedroom Standard

The current Policy sets out how many bedrooms a household is entitled to:

"In calculating how many bedrooms you need, we will allow you:

- one bedroom or a studio for you and your partner, if you have one
- one bedroom for every two children of the same sex, aged under eighteen
- one bedroom for a child of the opposite sex to another child, if the child is aged over ten
- one bedroom for any other adult"

It is proposed to adopt the Department for Communities and Local Government's guidance bedroom standard when determining the number of bedrooms required by an Applicant. This has been designed to take into account Housing Benefit regulations regarding bed sizes. The Bedroom Standard allocates a separate bedroom to each:

- married or cohabiting couple
- adult aged 21 years or more
- pair of adolescents aged 10-20 of the same sex
- pair of children aged under 10 regardless of sex

The policy will also be amended to note that under existing rules, applicants may be entitled for a home of one size but not be eligible for Housing Benefit at the same level.

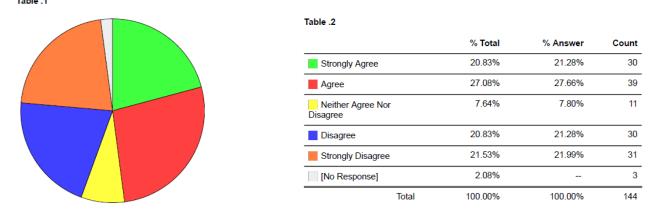
# **Consultation responses**

To what extent do you agree or disagree that Lewisham should adopt a new bedroom standard that increases the age to be considered an adult from 18 to 21?

Strongly Agree	20.83% - 30 responses
Agree	27.08% - 39 responses

Neither Agree Nor Disagree	7.64% - 11 responses
Disagree	20.83% - 30 responses
Strongly Disagree	21.53% - 31 responses
No Response	2.08% - 3 responses

To what extent do you agree or disagree that Lewisham should adopt a new bedroom standard that increases the age to be considered an adult form 18 to 21? Table .1



# Agree Comments by category

Will	Children	Prevents	More fair in	Manages
encourage	mature at	people	comparison	impact of
progression	different	having	to cost for	population
to higher	ages, 18 not	children to	comparative	increase
education	necessarily	get social	families in	and social
	right age to	housing	PRS	housing
	leave home			reduction
2	1	1	1	1

# Disagree Comments by category

No privacy/	People will	А	Will increase	We
puberty/age	remain in	person	refusals and	shouldn't
issues	unsuitable	is an	difficulty in	need to
	homes for	adult at	letting units	support
	longer	18 by		adults over
		law		18
6	2	2	1	1

# Other Comments by category

18 is adult by	Won't manage	
law and	incidents	
	between	

deserve own space	children/step children of different
	parents?
1	1

There was a range of views expressed in the consultation regarding this proposal. Whilst 47% agreed with the proposal, a significant minority of around 42% disagreed.

A number of respondents raised concerns regarding privacy as the proposed change will mean that the age at which an adult is entitled to their own room will increase from 18 to 21.

There are currently 347 households on the waiting list where there is at least one person aged 18-20 and where there is someone else of the same sex who is aged 10-17, which represents 3.7% of the housing register.

### Rent Arrears

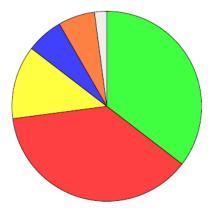
# **Consultation Responses**

To what extent do you agree or disagree that Lewisham should change the policy to require applicants to have a clear rent account at the point of offer?

Strongly Agree	35.42% - 51
Agree	37.50% - 54
Neither Agree Nor Disagree	12.50% - 18
Disagree	6.25% - 9
Strongly Disagree	6.25% - 9
No Response	2.08% - 3

To what extent do you agree or disagree that Lewisham should change the policy to require applicants to have a clear rent account at the point of offer?

Table .1



	% Total	% Answer	Count
Strongly Agree	35.42%	36.17%	51
Agree	37.50%	38.30%	54
Neither Agree Nor Disagree	12.50%	12.77%	18
Disagree	6.25%	6.38%	9
Strongly Disagree	6.25%	6.38%	9
[No Response]	2.08%		3
Total	100.00%	100.00%	144

### Agree Comments by category

Sensible incentive	Will help reduce waiting
incentive	list
1	1

# Disagree Comments by category

Individual	Adds to
circumstances	tenant's
should be	mental stress
assessed	
4	1

### Other Comments by category

Individual circumstances should be assessed	Landlords often can be the issue	Exemption policies need to be added
2	1	1

### Right to Move

### **Consultation Responses**

Under the 2015 'Right to Move' regulations, which are intended to make it easier for social tenants to move if the need to for work reasons, we are proposing the introduction of a quota ensuring that at least one per cent of all lettings are to households eligible under the 'Right to Move' guidance.

Strongly Agree	25.69% - 37
Agree	45.83% - 66
Neither Agree Nor Disagree	19.44% - 28

#### Table .2

Disagree	3.47% - 5
Strongly Disagree	2.08% - 3
No Response	3.47% - 5

Under the 2015 'Right to Move' regulations, which are intended to make it easier for social tenants to move if the need to for work reasons, we are proposing the introduction of a quota ensuring that at least one per cent of all lettings are to households eligible under the 'Right to Move' guidance.

Question responses: 139 (96.53%)

#### Table .1

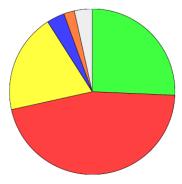


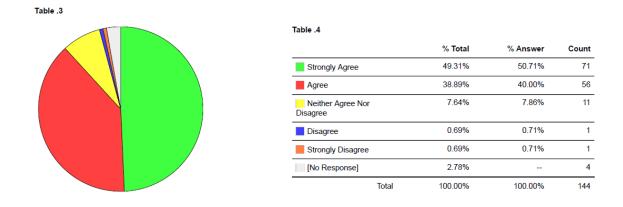
Table .2			
	% Total	% Answer	Count
Strongly Agree	25.69%	26.62%	37
Agree	45.83%	47.48%	66
Neither Agree Nor Disagree	19.44%	20.14%	28
Disagree	3.47%	3.60%	5
Strongly Disagree	2.08%	2.16%	3
[No Response]	3.47%		5
Total	100.00%	100.00%	144

# **Timescales** Clarification

### **Consultation Responses**

Clarify the likely timescales for Emergency Housing Panel cases to receive an offer. This would help manage expectations of service users and clarify timescales.

Strongly Agree	49.31% - 71
Agree	38.89% - 56
Neither Agree Nor Disagree	7.64% - 11
Disagree	0.69% - 1
Strongly Disagree	0.69% - 1
No Response	2.78% - 4



# Clarification of the temporary to permanent scheme

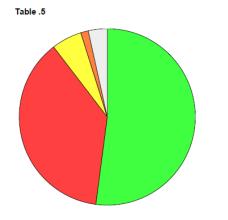
# **Consultation Responses**

Clarification around the temporary to permanent scheme allowing households to be moved into properties more quickly.

Strongly Agree	52.08% - 75
Agree	37.50% - 54
Neither Agree Nor Disagree	5.56% - 8
Disagree	0.00% - 0
Strongly Disagree	1.39% - 2
No Response	3.47% - 5

Clarification around the temporary to permanent scheme allowing households to be moved into properties more quickly.

Question responses: 139 (96.53%)



#### Table .6

		% Total	% Answer	Count
Strongly Agree		52.08%	53.96%	75
Agree		37.50%	38.85%	54
Neither Agree Nor Disagree		5.56%	5.76%	8
Disagree		0.00%	0.00%	0
Strongly Disagree		1.39%	1.44%	2
[No Response]		3.47%		5
	Total	100.00%	100.00%	144

# Facilitate Chain Lettings

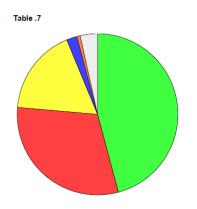
### **Consultation Responses**

Allow officers to facilitate 'chain lettings' which free up larger properties for large households.

- Large majority for agree Over 76% agree
- Less than 2% disagree

Strongly Agree	45.83% - 66
Agree	30.56% - 44
Neither Agree Nor Disagree	17.36% - 25
Disagree	2.08% - 3
Strongly Disagree	0.69% - 1
No Response	3.47% - 5

Allow officers to facilitate 'chain lettings' which free up larger properties for large households.



	% Total	% Answer	Count
Strongly Agree	45.83%	47.48%	66
Agree	30.56%	31.65%	44
Neither Agree Nor Disagree	17.36%	17.99%	25
Disagree	2.08%	2.16%	3
Strongly Disagree	0.69%	0.72%	1
[No Response]	3.47%		5
Total	100.00%	100.00%	144

# **Allocations Suspension**

# **Consultation Responses**

Allow applications to be suspended if applicants on the waiting list continually reject offers, causing delays in letting the properties and creating additional cost.

Strongly Agree	46.53% - 67
Agree	27.08% - 39
Neither Agree Nor Disagree	14.58% - 21

Question responses: 139 (96.53%)

Disagree	6.25% - 9
Strongly Disagree	4.17% - 6
No Response	1.39% - 2

Allow applications to be suspended if applicants on the waiting list continually reject offers, causing delays in letting the properties and creating additional cost. Question responses: 142 (98.61%)

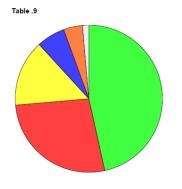


Table .10			
	% Total	% Answer	Count
Strongly Agree	46.53%	47.18%	67
Agree	27.08%	27.46%	39
Neither Agree Nor Disagree	14.58%	14.79%	21
Disagree	6.25%	6.34%	9
Strongly Disagree	4.17%	4.23%	6
[No Response]	1.39%		2
Total	100.00%	100.00%	144

# Medical Assessments

# **Consultation Responses**

Clarify that medical assessments may recommend an extra bedroom only on medical grounds.

Strongly Agree	43.06% - 62
Agree	34.03% - 49
Neither Agree Nor Disagree	15.28% - 22
Disagree	4.86% - 7
Strongly Disagree	0.00% - 0
No Response	2.78% - 4

Clarify that medical assessments may recommend an extra bedroom only on medical grounds.

Question responses: 140 (97.22%)

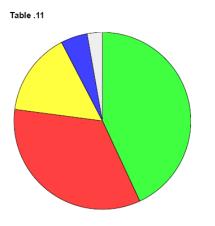


Table .12			
	% <b>T</b> i	otal % Answer	Count
Strongly Agree	43.0	6% 44.29%	62
Agree	34.0	3% 35.00%	49
Neither Agree Nor Disagree	15.2	28% 15.71%	22
Disagree	4.8	36% 5.00%	7
Strongly Disagree	0.0	0.00%	0
[No Response]	2.7	/8%	4
Тс	tal 100.0	00% 100.00%	144

# **Equalities Information of Respondents**

# Age Group

18-24	5.56% 8
25-29	15.28% 22
30-34	12.50% 18
35-39	16.67% 24
40-44	5.56% 8
45-49	11.81% 17
50-54	9.72% 14
55-59	6.94% 10
60-64	4.86% 7
65+	0.69% 1
I'd rather not say	6.94% 10

Please select your age group

Table .1

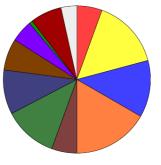


Table .2	
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	% Total	% Answer	Count
Under 18 years	0.00%	0.00%	0
18-24	5.56%	5.76%	8
25-29	15.28%	15.83%	22
30-34	12.50%	12.95%	18
35-39	16.67%	17.27%	24
40-44	5.56%	5.76%	8
45-49	11.81%	12.23%	17
50-54	9.72%	10.07%	14
55-59	6.94%	7.19%	10
60-64	4.86%	5.04%	7
65+	0.69%	0.72%	1
I'd rather not say	6.94%	7.19%	10

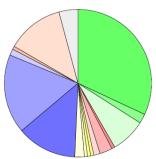
# Ethnicity

White English/Welsh/Scottish/Northern Irish/British	31.94% - 46
Irish	2.08% - 3
Gypsy or Irish Traveller	0.00% - 0
Any other White background	7.64% - 11
White and Black African	0.69% - 1
White and Black Caribbean	2.78% - 4
Any other mixed/multiple ethnic background	1.39% - 2
Bangladeshi	0.69% - 1
Pakistani	0.69% - 1
Indian	0.69% - 1
Any other Asian background	2.08% - 3
African	13.19% - 19
Caribbean	17.36% - 25
Any other Black/ African	1.39% - 2
Other ethnic group	0.69% - 1

I'd rather not say	12.50% - 18
No Response	4.17% - 6

#### What is your ethnic group?

Table .1



	% Total	% Answer	Count
White			
English/Welsh/Scottish/Northern Irish/British	31.94%	33.33%	46
<b>I</b> rish	2.08%	2.17%	3
Gypsy or Irish Traveller	0.00%	0.00%	0
Any other White background	7.64%	7.97%	11
Mixed/Multiple Ethnic Groups			
White and Asian	0.00%	0.00%	0
White and Black African	0.69%	0.72%	1
White and Black Caribbean	2.78%	2.90%	4
Any other mixed/ multiple ethnic background	1.39%	1.45%	2

	% Total	% Answer	Count
Chinese	0.00%	0.00%	0
Bangladeshi	0.69%	0.72%	1
Pakistani	0.69%	0.72%	1
Indian	0.69%	0.72%	1
Any other Asian background	2.08%	2.17%	3
Black/ African/ Caribbean/ Black British			
African	13.19%	13.77%	19
Caribbean	17.36%	18.12%	25
Any other Black/ African/ Caribbean background	1.39%	1.45%	2
Any other ethnic group			
Arab	0.00%	0.00%	0
Other ethnic group	0.69%	0.72%	1
I'd rather not say	12.50%	13.04%	18
[No Response]	4.17%		6
Total	100 00%	100 00%	144

# <u>Gender</u>

Male	20.83% - 30
Female	63.19% - 91
I'd rather not say	9.03% - 13
No Response	6.94% - 10

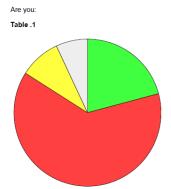


Table .2			
	% Total	% Answer	Count
Male	20.83%	22.39%	30
Female	63.19%	67.91%	91
I'd rather not say	9.03%	9.70%	13
[No Response]	6.94%		10
Total	100.00%	100.00%	144

# Disability

Yes	8.33% -12
No	77.78% - 112
I'd rather not	9.72% - 14
say	
No Response	4.17% - 6