

Consultation questions

Introduction

We are required by law to have a housing allocations policy. The policy sets out how we allocate the social housing that becomes available in Lewisham. The policy also outlines the procedures we have to follow to allocate these homes. The housing allocations policy is governed by legislation and guidance from the Government.

The policy makes sure we distribute the small number of social homes that are available as fairly as possible. Our approach aims to reflect local pressures and priorities, while offering applicants as much choice as possible.

We are in the process of reviewing the policy. As part of this, we are legally required to consult with the public on the proposed policy changes we would like to make.

The purpose of this consultation is to seek your views on:

- Changes to banding
- new primary rehousing reasons
- A new 'Smart lettings' approach
- The 'Three Offer' rule
- Changes to how applicants bid

Full details of these proposed changes are provided within the questions below.

Question 1: Creating a “priority homeless with additional need” rehousing reason

Our current policy:

We will assess your application based on the rehousing reasons that your household may have. You will then be placed into a priority band. The higher the priority, the more likely you will be successful in your bid for social housing.

If your household has multiple rehousing reasons, it will be placed into the highest band based on those reasons.

Properties are offered to applicants based on applications that meet the highest priority band. For example, if you are an applicant in the ‘Emergency Priority’ band, and an applicant in the ‘High Priority’ band bids for the same house, your application will be prioritised and you will receive an offer.

Each priority band contains groups of rehousing reasons. We use these to describe your housing need so that we can offer you a suitable property.

Homeless applicants are currently allocated within the Band 3 priority band category

Our proposed change:

We propose introducing a new “homeless with additional need priority” within the Band 2 category. This will ensure that we are able to respond to very specific cases of homelessness across the borough. Homeless applications without additional needs will remain unchanged within the Band 3 category.

We could use a number of criteria to determine “additional need”:

1. If you are an applicant who has been awarded ‘in-borough priority’ under our Location Priority Policy. The Location Priority Policy:
 - i. Sets out how the Borough will fairly allocate temporary accommodation within and close to Lewisham;
 - ii. ‘In-borough priority’ is given to residents who have a particular need to be housed within Lewisham (e.g. these include people: receiving specialist treatment that cannot be transferred to another location; where moving away from Lewisham would be detrimental to a household member’s health); **or**
2. If you are an applicant whose application is seen as unable to sustain a private rented sector tenancy under the private rented sector discharge policy;
 - i. The private rented sector discharge policy sets out how the Council will arrange an offer of accommodation for homeless households, as part of its main housing duty to residents.
 - ii. We will arrange a private rented sector offer of housing for homeless households, except in cases where it is not possible to house the household in this accommodation (e.g. health reasons); **or**
3. A combination of both of these policies.

Question 1a:

Do you agree that we should consider introducing a new “homeless with additional need priority” group?

- Agree
- Disagree

Further comments:

Question 1b:

How should we decide additional need for homeless applicants?

- Using "in-borough priority" under the Location Priority Policy
- Using the private rented sector discharge policy
- A combination of both of these policies
- Other (please specify)

Further comments

Question 2: Changing the priority of “overcrowded” rehousing reasons

Our current policy:

Overcrowded rehousing reasons are currently:

“Overcrowded by 2 beds”, in Priority band 2; and

“Overcrowded by 1 bed”, in Priority Band 3

Our proposed change:

We propose introducing a new “overcrowded by three bed” rehousing reason. This will help us to be more successful in allocating properties to households who are in the worst overcrowded situations.

We propose:

- the new overcrowded by 3 bed rehousing reason to be placed in band 2
- the overcrowded by 2 bed to be in band 3
- overcrowded by 1 bed to be moved to a new band 4.

Overcrowding has created a substantial pressure across the Borough. We estimate that around 160 applicants within Lewisham are overcrowded by three beds or more. That means these families may be living in one or two bed accommodation but will be in need of four and five bed properties.

Given the shortage of large properties that are available on the social housing register, the likelihood of this group receiving those properties is currently low.

To help with this issue, we propose that adult children (over 21 years old) are not considered when calculating the size of properties required for applicants in this band, unless they are dependents or have caring responsibilities.

In addition, we propose moving overcrowded by 1 bed to a new band 4. This is so that we are able to prioritise households who require larger properties.

Question 2a:

Do you agree that we should consider introducing a new ‘overcrowded by three bed’ group?

- Agree
- Disagree

Further comments:

Question 2b:

Do you agree that we should not include adult children for the new ‘overcrowded by 3 bed’ band?

- Agree
- Disagree

Further comments:

Question 2c:

Do you agree that we should consider moving “overcrowded by one bed” to a new Band 4 priority group?

- Agree
- Disagree

Further comments

Question 3: Banding reallocation

Our current policy:

We will assess your application based on the rehousing reasons that your household may have. You will then be placed into a priority band. The higher the priority, the more likely you will be successful in your bid for social housing.

If your household has multiple rehousing reasons, it will be placed into the highest band based on those reasons.

Properties are offered to applicants based on applications that meet the highest priority band. For example, if you are an applicant in the 'Emergency Priority' band, and an applicant in the 'High Priority' band bids for the same house, your application will be prioritised and you will receive an offer.

Each priority band contains groups of rehousing reasons. We use these to describe your housing need so that we can offer you a suitable property.

Our proposed change:

Table 1, below, shows the proposed allocation of rehousing reasons within the proposed new banding structure.

We believe that, given the shortage of properties and the high housing need within the borough, this proposal will help target those in most need.

Table 1: Proposed group reallocation

Proposed new band	Rehousing reason
Band 1: Emergency	Decants
	Emergency Priority
	Exceptional Medical circumstance
	Leaving Care
	Management Discretion
	Occupier no longer requires specialist unit
	Discretionary succession
	Retiring Lewisham Council residential employees
	Starred decant priority
	Succession to large property
	Tenant-free Special Unit
	Under-occupied property
	Former armed forces personnel with housing need
Band 2: High	Priority homeless with additional need*
	Supported housing move on
	Medical high
	Overcrowded by three beds*
Band 3: Medium	Priority Homeless with no additional need
	Management Discretion 2
	Overcrowded by two bed
	Request to return following a decant
	Medical
	Prohibition order
	Welfare - give or receive support
Welfare - housing for older people	
Band 4: Low**	Overcrowded by one bed

* indicates proposed new rehousing reason

** indicates proposed new band priority

Question 3:

Do you agree that we should consider placing rehousing reasons in priority bands as outlined above (Table 1)?

- Agree
- Disagree

Further comments:

Question 4: “Smart letting” properties

Our current policy:

We already make provision to reserve up to five per cent of its properties for pan-London mobility arrangements.

Section 3.4.6 of the 2017 Allocation Policy also makes provision for us to ‘set a target for the number of properties for the number of homes to be let to ... priority groups’. It also removes a number of properties from being advertised to applicants.

Our proposed change:

Within the new policy, **we propose ring-fencing up to 20% of properties** to applicants who are currently living in social housing and who have a housing need. We would call this “smart letting” properties.

We would make sure that the social housing property vacated by the applicant is ring-fenced to someone who is in need and living in private rented housing or temporary accommodation.

For example, if you are already living in social housing and are on the register, you could bid for one of the properties within the ‘smart letting’ scheme. The property that you vacate would then be ring-fenced for another individual or family with a housing need. This individual or family would not currently be in social housing, and would move from temporary accommodation or the private rented sector.

Aside from building new social homes, this is a key way for us to make best use of the available social housing with the resources that we already have. For each property, we could solve two households’ needs. The approach makes sure that we are fairly allocating the available housing to all applicants.

Question 4:

To the number of lettings available, do you agree that we should consider operating a “smart letting” system?

- Agree
- Disagree

Further comments:

Question 5: Changing the 'Three Offer' Rule

Our current policy:

You are within your rights to refuse a set number of suitable offers of a property that you have bid for and have been subsequently offered. This set number varies according to the primary rehousing reason that has been allocated to your application. For further information, please see section 2.2.3 and 2.2.4 of the current allocations policy.

The set number is either once (the 'One Offer' rule) or three times (the 'Three Offer' rule). If the number of suitable properties that you have refused exceeds the rule for your housing reason, you may be disqualified from the housing register for 12 months.

Our proposed change:

We propose reducing the 'Three Offer' rule to a 'Two Offer' rule. If you are an applicant living in under-occupied properties, this will not apply to you. We are not proposing to amend the primary rehousing reasons that the 'Two Offer' and 'One Offer' rules apply to – applicants currently eligible for three offers will move to two offers, while applicants eligible for 'One Offer' will remain the same.

We believe that a 'Two Offer' policy is reasonable, given that:

- i. there is a lack of housing available
- ii. there is a need for us to let properties as quickly as possible
- iii. there is an administrative burden for us for those who refuse offers
- iv. the resident has bid for the property and indicated preference for that property

Question 5:

Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?

- Agree
- Disagree

Further comments:

Question 6: Changes to how applicants bid

Our current policy:

The current system allows you to bid for one property per week. You will then be offered an interview/viewing of a property.

Our proposed change:

To make the bidding process more efficient for users and for us, we propose increasing the number of bids you can make so that you can bid for multiple properties. This is beneficial for applicants as you will be able to express preference for more than one property and not be constrained by the system.

You would be able to bid throughout the week for these properties and, if successful, you would then be offered **one** viewing.

Question 6:

Do you agree that we should consider changing how you bid for properties so that you can bid for multiple properties each week?

- Agree
- Disagree

Further comments: