Appendix A

Lewisham Council consultation on proposed changes to the Allocations Scheme

Consultation Report

Spring 2021

Contents

1. **Context**

1.1. The demand for social housing in Lewisham continues to outstrip supply. There were 7,830 households on the housing register at the end of March 2013[1], as of March 2021 there were 10,088. The council made 1,562 lets in 2012/13. Since then an average of 1,137 lets per year have been made – a 27% decrease.

1.2. Over time the nature of this demand has changed. In March 2016 there were 1,750 households in temporary accommodation and seeking social housing through the Housing Register. By March 2021 this had increased by 42% to 2,486. Over 2,500 households approach the council for homelessness assistance every year, leading to increased pressure on ever scarcer homes.

1.3. There is also a disparity between the household need for those requiring social housing and its availability. The below table sets out social housing lets in 2019/20 against the demand for this accommodation. Many hundreds of households require larger sized accommodation yet such accommodation is in scarce supply.

Bedroom	Let in 19/20	Let in 20/21*	Number on the register in housing need as at May 21
1 bedroom	624	414	1830
2 bedroom	305	246	3588
3 bedroom	171	112	3266
4 bedroom	27	13	996
5 bedroom	1	6	334

*There may be small undercount in these figures due to some administration processes still being completed when producing this report, from lets that took place towards the end of the FY 20/21

1.4. GLA estimates indicate that around 27.4% of all households in Lewisham are social rented, approximately 32,800 homes.

1.5. The council has 100% nomination rights agreements with most of the major registered providers in Lewisham. This means that all properties that become available in Lewisham in the stock of a provider is made available to households in line with the Lewisham Allocations scheme.

1.6. This combination of scarce social housing, high and growing demand, and access via nominations agreements means that the Lewisham Allocations scheme is a crucial tool in resolving housing need.

2. **Background**

2.1. There have been two updates to the councils Allocations scheme in the past 10 years. The first was in 2012 in response to the Localism Act 2011 and the introduction of a new statutory Code of Guidance on Allocations in June 2012. The changes introduced in the 2012 scheme included substantive changes on priority bandings and other areas.

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[1] Prior to this the Council had a different scheme in place which allowed households not deemed to be in housing need to join the register and had over 17,700 households on the housing register.

2.2. The second set of amendments were in April 2017 following Mayor and Cabinet approval in December 2016. This update made changes to the council's local connection rules and provided further clarity on some areas of the scheme, but contained no changes to the priority given within the scheme.

2.3. As set out in the introduction there has been a significant shift in the nature of demand and the availability of social housing over this period.

2.4. The Lewisham Housing Strategy 2020-26 reflects on the scale of this challenge and sets out the strategic principles by which the council will deliver its vision. The strategy recognises the need for the council to support residents at times of urgent need, and one of the elements of this is 'ensuring our social homes are let in the most effective way to meet housing need'.

2.5. With social housing increasingly scarce and demand increasing it is essential that the Allocations scheme in operation effectively allocates properties to those in the most need and maximises the utility of this essential asset.

2.6. Legislation requires that local authorities provide opportunity for those affected to be made aware of any amendments that might affect them where any major changes are proposed. In order to meet this requirement the council instigated a formal consultation based on a range of proposals that are under consideration.

2.7. The proposals set out in the consultation have been developed after careful consideration of the scale of demand, the availability of accommodation and the strategic direction of the council. The proposals were drafted as a set of questions for the purpose of consultation and are outlined below:
- Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?
- Do you agree that we should not include adult children for the new 'overcrowded by three band'?
- Do you agree that we should consider moving 'overcrowded by one bed' to a new Band 4 priority group?

3. **Methodology**

3.1. A public consultation on the proposed changes to the councils Allocations scheme was launched on the 27th November 2020 to run for 12 weeks until the 14th February 2021. In responses to representations that were made by some respondents, and recognising the ongoing impact of COVID-19, the council extended the deadline for responses until the 14th March 2021. The consultation therefore ran for a total of 16 weeks.

3.2. The consultation was hosted on Lewisham's website using the online consultation portal Citizen Space. A dedicated council inbox was also made available for respondents should

they wish to make direct representations or to provide additional commentary to their consultation response.

3.3. The consultation was promoted widely including:

- **Online/Social Media**: Promotions via the Lewisham Council website including an alert banner at the top of all Housing pages, Twitter promotion, and notifications published on the Homesearch page;
- **Direct Communication**: Two texts sent directly to residents in Hostels and a text to all residents in Temporary Accommodation, an email to all residents at Lewisham Homes, direct contact with TMOs, email to all residents on the housing register, individual consultation sessions with residents in supported housing;
- **Partner engagement:** Contact with all major RPs in Lewisham, request that RPs publicise with their residents and online, engagement with representative groups and forums across Lewisham;
- **Internal Council Communication**: Included in the Chief Executive Briefing, Yammer posts published, Email tag-lines promoting the survey, direct contact with key internal partners and an intranet feature;
- **Focus Groups**: Two focus groups were held, targeted particularly towards underrepresented groups, and promoted via representative partner agencies;
- **Meetings**: Attendance at the Homelessness forum, session with RPs, two public meetings advertised through partner agencies, and held with interested parties.

3.4. Paper consultations and translations in other languages were available upon request. Those whose first language was not English and wanted to input their views were able to send us an email with their details and their chosen language, following which contact was made with the assistance of Language Line to collect their views in their desired language. This was communicated to residents throughout the consultation and was translated into a number of languages on the front page of the online consultation.

3.5. Respondents who emailed the inbox directly were invited to complete the online survey and were advised that their comments would be considered in the consultation response.

4. **Summary of findings**

4.1. Over 1,000 residents participated with the consultation either through the completion of the online survey, attending a focus group session or providing their comments via a dedicated email inbox.

4.2. 942 residents responded through the online survey of which 804 (85%) were Lewisham residents.

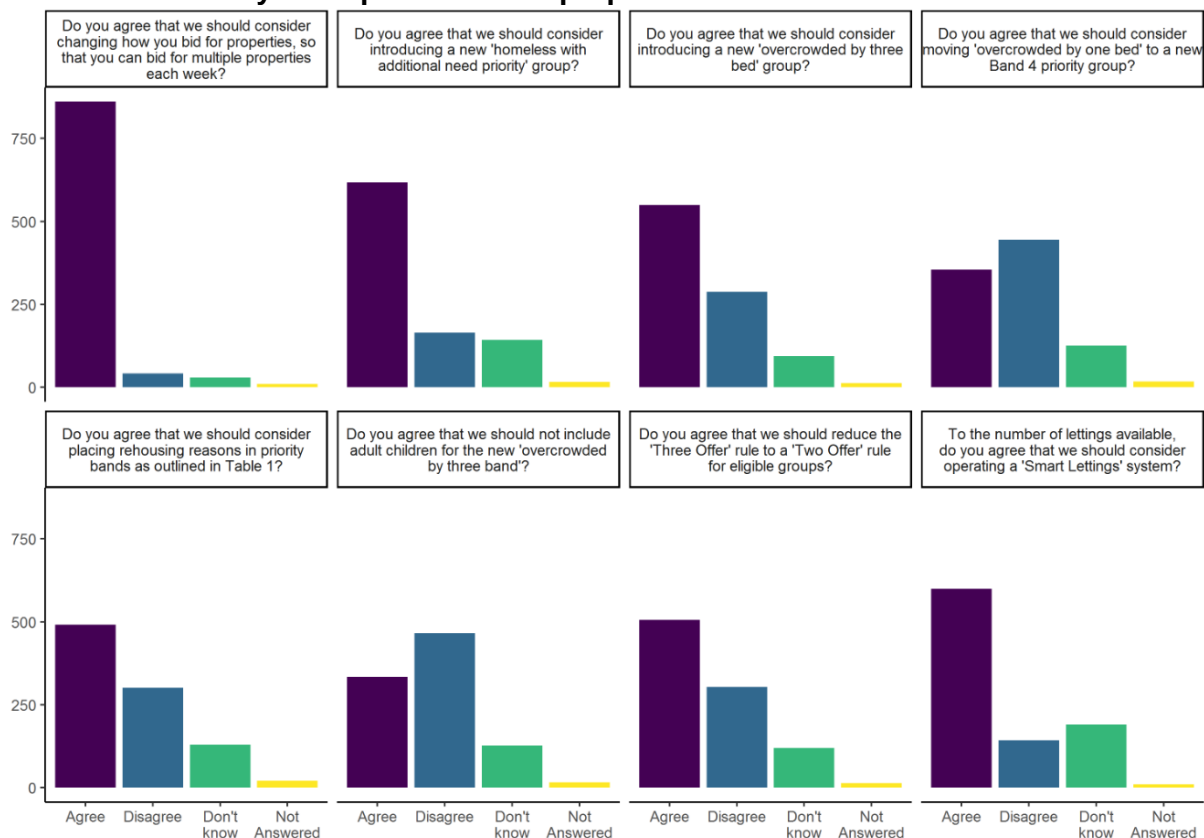4.3. Over 50% of all respondents agreed with the following questions:
- Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

4.4. More residents disagreed than agreed with the following proposals:
- Do you agree that we should not include adult children for the new 'overcrowded by three band'?
- Do you agree that we should consider moving 'overcrowded by one bed' to a new Band 4 priority group?

4.5. The below chart sets out the number of respondents who agreed, disagreed, did not know or didn't answer each question.

Chart 1 – Summary of responses to the proposals

4.6. The below table sets out the percentage breakdown of responses to each question.

Table 2 – Percentage breakdown of responses to the proposals

Survey Question	Agree	Disagree	Don't know	Not Answered
Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1?	52.1%	32.0%	13.7%	2.2%
Do you agree that we should consider introducing a new 'overcrowded by three bed' group?	58.3%	30.5%	10.0%	1.3%
Do you agree that we should not include adult children for the new 'overcrowded by three band'?	35.5%	49.4%	13.5%	1.7%
Do you agree that we should consider moving 'overcrowded by one bed' to a new Band 4 priority group?	37.7%	47.1%	13.4%	1.8%
Do you agree that we should consider introducing a new 'homeless with additional need priority' group?	65.6%	17.5%	15.2%	1.7%

Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?	91.4%	4.4%	3.2%	1.1%
Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?	53.6%	32.2%	12.7%	1.5%
To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?	63.6%	15.2%	20.2%	1.1%

5. **Consultation participants**

5.1. 804 (85%) of the 942 respondents lived in Lewisham borough. The table below sets out the responses broken down by ward.

Table 3 – Responses by ward

Ward	Constituency	Respondents	% of total
Bellingham	Lewisham West & Penge	32	3.4%
Blackheath	Lewisham East	14	1.5%
Brockley	Lewisham Deptford	68	7.2%
Catford	Lewisham East	121	12.8%
Crofton Park	Lewisham Deptford	12	1.3%
Downham	Lewisham East	43	4.6%
Evelyn	Lewisham Deptford	56	5.9%
Forest Hill	Lewisham West & Penge	66	7.0%
Grove Park	Lewisham East	32	3.4%
I don't live in Lewisham	Not Lewisham	138	14.6%
Ladywell	Lewisham Deptford	19	2.0%
Lee Green	Lewisham East	31	3.3%
Lewisham Central	Lewisham Deptford	88	9.3%
New Cross	Lewisham Deptford	99	10.5%
Perry Vale	Lewisham West & Penge	8	0.8%
Rushey Green	Lewisham East	14	1.5%
Sydenham	Lewisham West & Penge	81	8.6%
Telegraph Hill	Lewisham Deptford	13	1.4%
Whitefoot	Lewisham East	7	0.7%

5.2. Over 50% of all respondents are either currently in social housing or are in temporary accommodation. The below table sets out the tenure breakdown of all respondents.

Table 4 – Responses by tenure

Tenure	Respondents	% of total
I am currently staying with family for free	33	3.5%
I am currently staying with friends for free	1	0.1%
I am in supported housing	14	1.5%
I am in temporary accommodation	192	20.4%

I do not currently have a fixed address	3	0.3%
I live in a care facility	1	0.1%
I own my home with a mortgage	57	6.1%
I own my home without a mortgage	28	3.0%
I rent my home privately	121	12.8%
I rent my home through a housing association or other social housing provider	308	32.7%
Prefer not to say/Not answered	184	19.5%

5.3. A substantial majority of all respondents (69.7%) are female. The below table sets out the gender breakdown of all respondents.

Table 5 – Responses by gender

Gender	Respondents	% of total
Not answered	79	8.4%
Female	657	69.7%
Male	163	17.3%
Other	4	0.4%
Prefer not to say	39	4.1%

5.4. Respondents from a wide range of ethnicities completed the questionnaire. 39% of all respondents were black and 31.2% were white. The below table sets out the ethnicity breakdown of all respondents.

Table 6 – Responses by ethnicity

Ethnicity	Respondents	% of total
Asian - Bangladeshi	1	0.1%
Asian - British	6	0.6%
Asian - Chinese	2	0.2%
Asian - Indian	2	0.2%
Asian - Other	9	1.0%
Asian - Pakistani	5	0.5%
Black - African	116	12.3%
Black - British	138	14.6%
Black - Caribbean	102	10.8%
Black - Other	11	1.2%
Mixed - Other	15	1.6%
Mixed - White and Asian	4	0.4%
Mixed - White and Black African	20	2.1%
Mixed - White and Black Caribbean	32	3.4%
Not Answered	99	10.5%
Other (Please describe below)	28	3.0%
Prefer not to say	58	6.2%
White - British	238	25.3%
White - Gypsy or Irish Traveller	1	0.1%

White - Irish	12	1.3%
White - Other	43	4.6%

5.5. Over 16% of respondents have a disability, as set out in the below table. Of those who have a disability 19.7% have a longstanding illness or health condition, 18.6% have a mental health condition, 18.6% have a physical or mobility related disability, 11% have a disability not listed, 4% have a cognitive or learning disability, 3% have a visual or hearing related disability and the remainder preferred not to say.

Table 7 – Responses by disability

Disability	Respondents	% of total
Not answered	98	10.4%
No	646	68.6%
Prefer not to say	45	4.8%
Yes	153	16.2%

5.6. Almost 70% of respondents identified as straight or heterosexual. 25.1% of respondents either preferred not to say or did not answer, 2.9% are bisexual, 1.6% are gay or lesbian and 0.6% identified differently to those options available on the list. The below table sets out the sexual orientation of all respondents.

Table 8 – Responses by sexual orientation

Sexual Orientation	Respondents	% of total
Not answered	138	14.6%
Bisexual	27	2.9%
Gay or lesbian	15	1.6%
Other	6	0.6%
Prefer not to say	99	10.5%
Straight or heterosexual	657	69.7%

5.7. More respondents identified as Christian than any other religion or belief, with 45.9% of all respondents identifying as such. The below table sets out the religion or belief of all respondents.

Table 9 – Responses by religion or belief

Religion or belief	Respondents	% of total
Not answered	145	15.4%
Buddhist	7	0.7%
Christian	432	45.9%
Hindu	4	0.4%
Jewish	2	0.2%
Muslim	46	4.9%
None	196	20.8%
Other	20	2.1%
Prefer not to say	90	9.6%

5.8. 0.7% of all respondents stated that their gender identity was different to the gender they were assigned at birth. 70.6% reported having the same gender as assigned at birth and the remainder preferred not to say or did not answer. The below table sets out the gender identity in relation to that assigned at birth of all respondents.

Table 10 – Responses by gender identity

Gender Identity	Respondents	% of total
Not answered	205	21.8%
No my gender identity is the same	665	70.6%
Prefer not to say	65	6.9%
Yes my gender identity is different	7	0.7%

5.9. Over 5% (50) respondents were either pregnant at the time of completing the survey or had been pregnant within the last 6 months. 72.4% of respondents were not pregnant or had not been pregnant in the last 6 months and the remainder either did not respond or preferred not to say. The below table sets out the maternity status of all respondents.

Table 11 – Responses by maternity status

Pregnant or on Maternity Leave	Respondents	% of total
Not answered	171	18.2%
I am currently pregnant	23	2.4%
I have been pregnant in the last six months	27	2.9%
None of the above	682	72.4%
Prefer not to say	39	4.1%

5.10. Almost 17% of respondents have caring responsibilities, as set out in the below table. Over half of those who had caring responsibilities reported that these were more than 16 hours per week. 14.8% of all respondents (140) receive some form of support for the unpaid care they provide.

Table 12 – Responses by caring responsibilities

Caring responsibilities	Respondents	% of total
Not answered	180	19.1%
No	570	60.5%
Prefer not to say	34	3.6%
Yes	158	16.8%

6. <u>Consultation Detail</u>

6.1. This section sets out in detail the responses to the survey broken down by the personal and household characteristics of the respondent. Where there were a substantial number of options to select, groups that constituted less than 5% of the total response have been grouped if appropriate so as to allow meaningful visualisation of the responses.

6.2. The number in brackets at the top of the chart represents the number of respondents who answered both the personal/household characteristic question and the survey question. The decimal figures in the axis represent the response rate per individual answer and group (where 0 would be 0% of respondents from that group and 1 would be 100% of respondents).

<u>Location</u>

6.3. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the location of the respondent. Due to the number of wards in Lewisham these have been grouped by constituency to allow for clearer visualisation.

Chart 2 – Responses by location – wards grouped by constituency

If you live in Lewisham, which ward do you live in? Grouped

Legend: Lewisham Deptford (355), Lewisham East (262), Lewisham West & Penge (187), Not Lewisham (56)
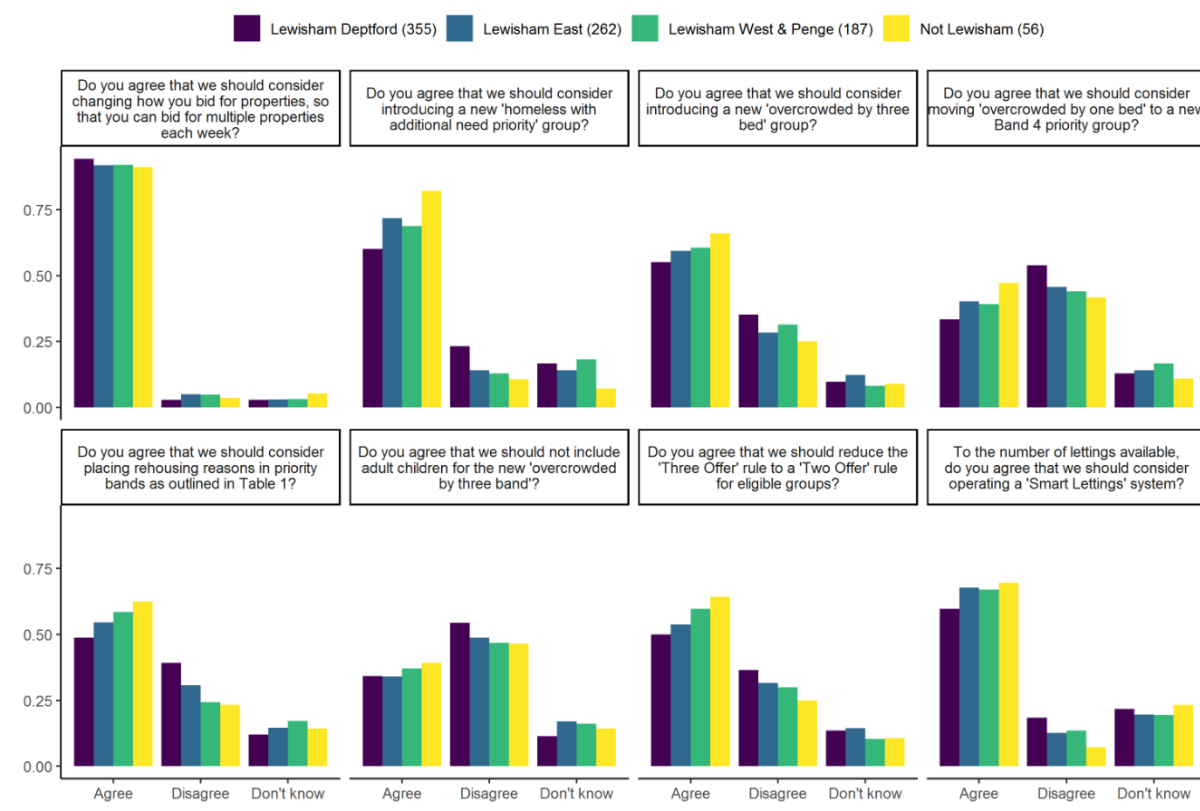
6.4. There was broad agreement to the following proposals from residents in all areas:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?
- Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.5. In each area, more respondents agreed with the proposal to place the rehousing priorities in the bands as outlined in table 1 in the consultation. However, in Lewisham Deptford this was less than half (48.9%) with 39.1% in disagreement. In all other areas more than half of the respondents agreed with this proposal.

6.6. Respondents from all areas except those from outside of Lewisham were more likely to disagree than agree with the proposal to move overcrowding by 1 bed into a new band 4. This was most prevalent in Lewisham Deptford where 53.8% of all respondents disagreed with the proposal.

6.7. Over 54% of respondents from Lewisham Deptford disagreed with the proposal to exclude adult children from the proposed overcrowded by 3 bed priority. More respondents disagreed with this proposal than agreed with it in every other constituency.

<u>Current accommodation</u>

6.8. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the current accommodation of the respondent.

Chart 3 – Responses by current accommodation

What type of household do you live in? Grouped
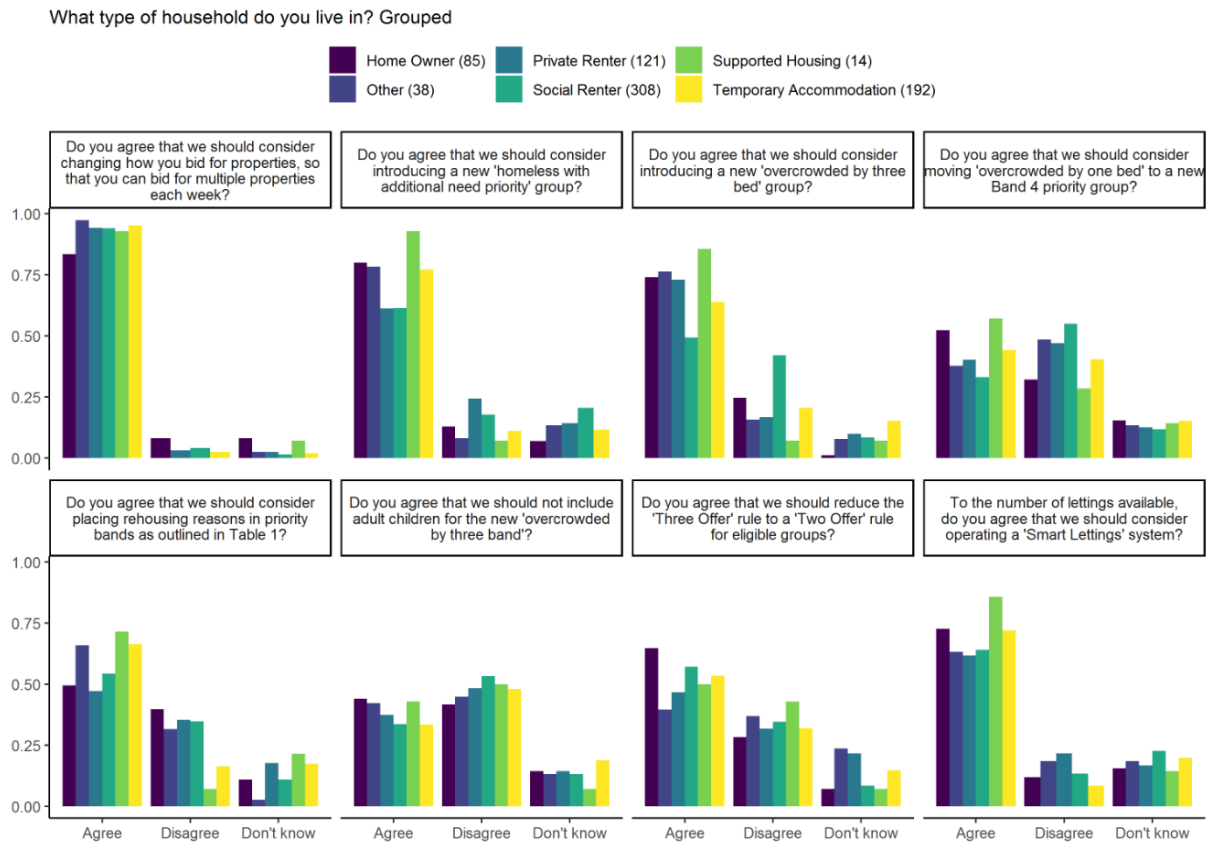
6.9. There was broad agreement to the following proposals from all household types:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.10. The responses diverged more in other areas. Over 70% of respondents not in social housing agreed with the proposal to introduce a new 'Overcrowded by three bed group' whereas only 49% of those in social housing did.

6.11. Social renters were the most likely to disagree (55%) with the proposal to move overcrowding by one band into a new band 4. Those in temporary accommodation were slightly more likely to agree to this proposal (44%) than disagree (40%) and only home owners and those in supported housing agreed by more than 50%.

6.12. All groups were more likely to agree than disagree with the proposal to place the rehousing priorities in the bands set out in table 1 in the consultation. However, slightly less than half of all home owners (49%) and private renters (47%) agreed with this proposal.

6.13. Private renters (46.7%) and those in other accommodation (39.5%) were the least likely to agree with the proposal to reduce the three offer rule to a two offer rule, but were more likely to agree than disagree. All other groups agreed with this proposal by more than 50%.

6.14. Apart from home owners, all groups disagreed more than they agreed with the proposal to exclude adult children in the proposed new overcrowded by three bedroom priority reason. 53% of all social renters disagreed with this proposal, as did 50% of those in supported housing, 48% of private renters and 48% of those in Temporary Accommodation.

Gender

6.15. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the gender of the respondent.

Chart 4 – Responses by gender
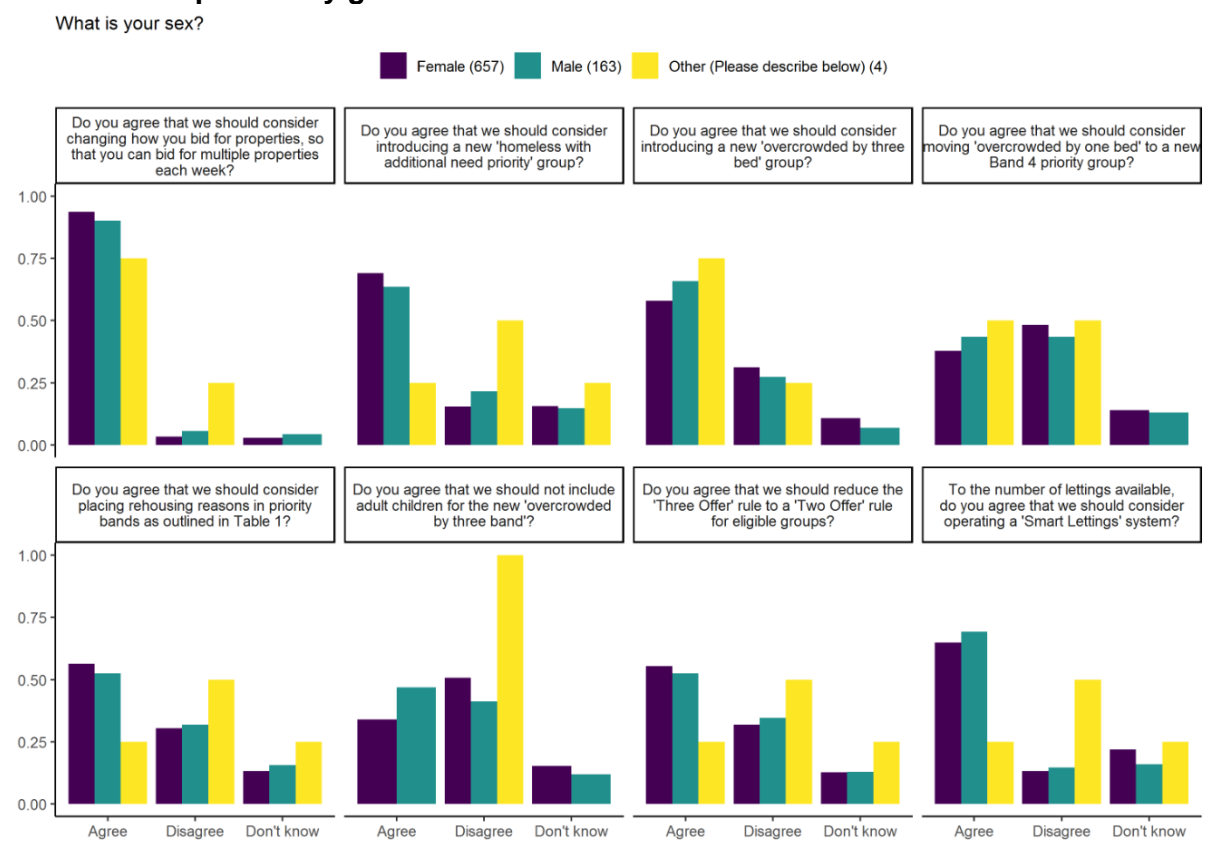
6.16. There was broad agreement to the following proposals from respondents of all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
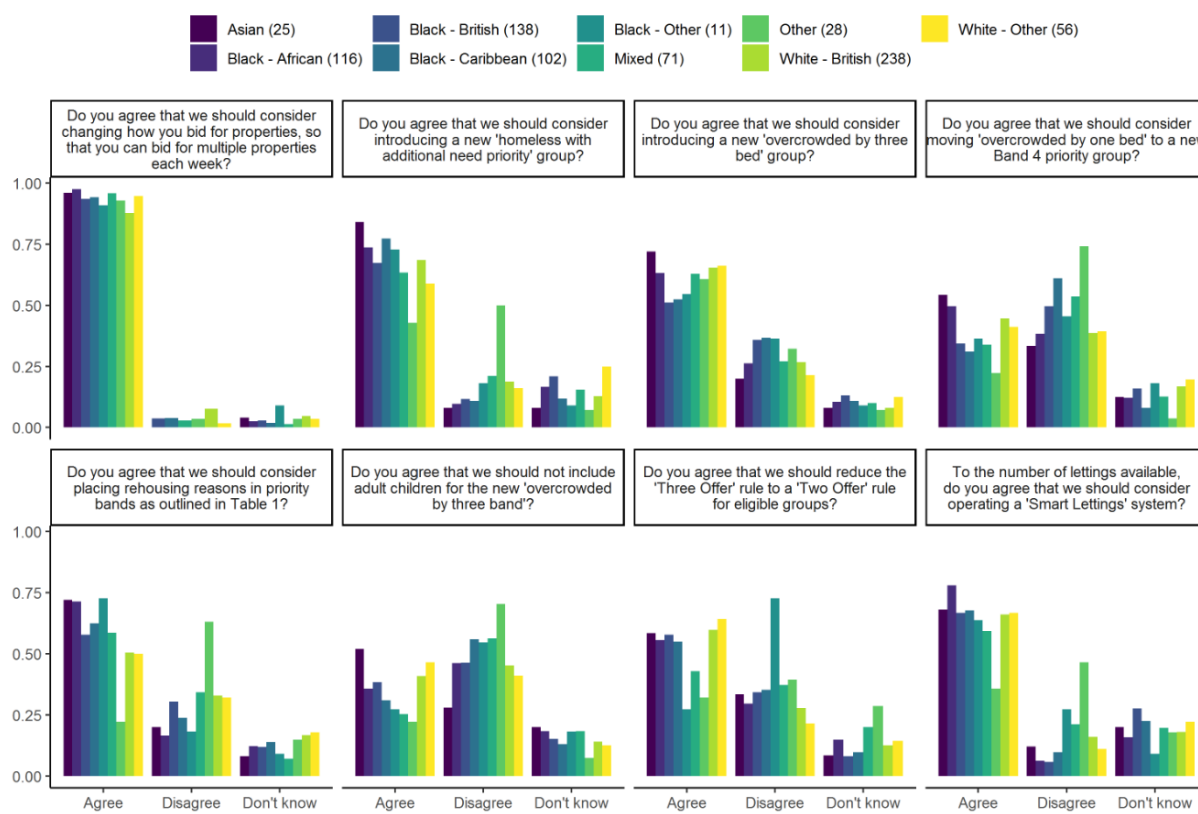- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?

6.17. Male (63.5%) and Female (69.1%) respondents were in agreement with the proposal to introduce a new category of Homeless with additional needs. 50% of those who identified as other disagreed with this proposal.

6.18. 48.3% of female respondents disagreed with the proposal to move overcrowding by one bed to band 4. An equal number of male respondents agreed and disagreed with the proposal (43.5%) as did other respondents (50%).

6.19. The majority of Male (52.5%) and Female (56.4%) respondents agreed to the proposal to set the rehousing reasons in the banding set out in table 1 in the consultation. 25% of those who identified as other agreed with this proposal, a further 50% disagreed and 25% did not know.

6.20. Males (46.9%) were more likely to agree than disagree with the proposal to exclude adult children from the overcrowded by three bed priority reason. Females were more likely to disagree to this proposal (50.8%) and 100% of those who identified as other disagreed with this proposal.

6.21. 55.4% of all females agreed that the three offer rule should be reduced to two offers for eligible groups, and 52.5% of males agreed with this proposal. 25% of those who identified as other agreed with this proposal and 50% disagreed.

6.22. Those who identified as other were more likely to disagree (50%) with the proposal to introduce a 'Smart Lettings' scheme than agree (25%). 64.9% of all female respondents and 69.3% of all male respondents agreed with this proposal.

Ethnicity

6.23. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the gender of the respondent. Due to the number of different ethnicities that were represented in the response have been grouped where appropriate and where the response represented less than 5% of all responses.

Chart 4 – Responses by ethnicity

What is your ethnicity? Grouped

Asian (25) · Black - African (116) · Black - British (138) · Black - Caribbean (102) · Black - Other (11) · Mixed (71) · Other (28) · White - British (238) · White - Other (56)

6.24. There was broad agreement to the following proposals from respondents of all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?

6.25. Respondents from most groups were in agreement with the proposal to introduce a new homeless with additional needs group, with agreement above 50% for every group except Other (42%).

6.26. The response was much more mixed regarding the proposal to move overcrowded by one bed into band 4. Respondents who are Black British, Black Caribbean, Black Other, Mixed or Other all disagreed more they agreed with this proposal. Respondents who are Asian, Black African, White British or White Other were more likely to agree than disagree with this proposal.

6.27. Respondents from most groups were in agreement with the proposal to institute the bandings as set out in table 1 in the consultation, with agreement above 50% for every group except Other (22%).

6.28. Most groups were more likely to disagree with the proposal to exclude adult children from the overcrowded by three bed priority reason. Respondents who are Black African (46.1%), Black British (46.4%), Black Caribbean (56%), Black Other (54.5%), Mixed (56.3%), Other (70.4%) and White British (45.1%) were more likely to disagree with this proposal than agree. Respondents who are Asian (52%) or White Other (46.4%) were more likely to agree with this proposal than disagree.

6.29. A majority of respondents across most groups agreed with the proposal to reduce the three offer rule to two offers for eligible groups. Whilst still more likely to agree than disagree, less than half (42.9%) of respondents who identified as mixed ethnicity agreed with this proposal, and respondents who identified as Black Other (72.7%) or Other (39.3%) were more likely to disagree than agree with this proposal.

6.30. Respondents from most groups were in agreement with the proposal to introduce a 'Smart Lettings' policy, with agreement considerably above 50% for every group except Other (35.7%), who were more likely to disagree than agree with this proposal.

Disability

6.31. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the whether the respondent had a disability.

Chart 5 – Responses by disability
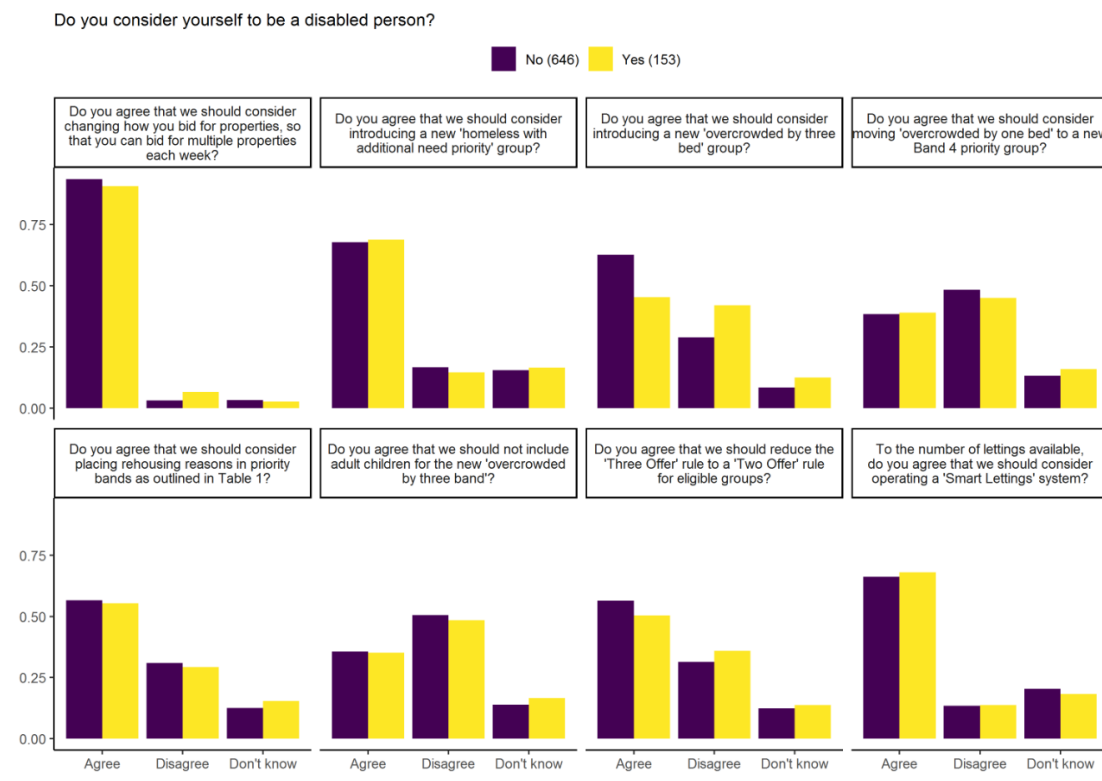
6.32. There was broad agreement to the following proposals from respondents who consider themselves to be disabled and those who do not:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1?
- Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.33. Less than half of respondents who consider themselves to be disabled agreed with the proposal to introduce a new overcrowded by three bed priority reason (45.4% compared to 42.1% in disagreement). 62.7% of respondents who do not consider themselves to be disabled agreed with this proposal.

6.34. Respondents who consider themselves to be disabled were more likely to disagree (45.0%) than agree (39.1%) with the proposal to move overcrowded by one bed into band 4. Respondents who do not consider themselves to be disabled were also more likely to disagree (48.4%) than agree (38.5%) with this proposal.

6.35. Likewise, 48.3% of respondents who consider themselves to be disabled disagreed with the proposal to exclude adult children from the overcrowded by three bed priority group. 50.5% of respondents who do not consider themselves to be disabled disagreed with this proposal.

6.36. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the disability that the respondent has.

Chart 6 – Responses by type of disability
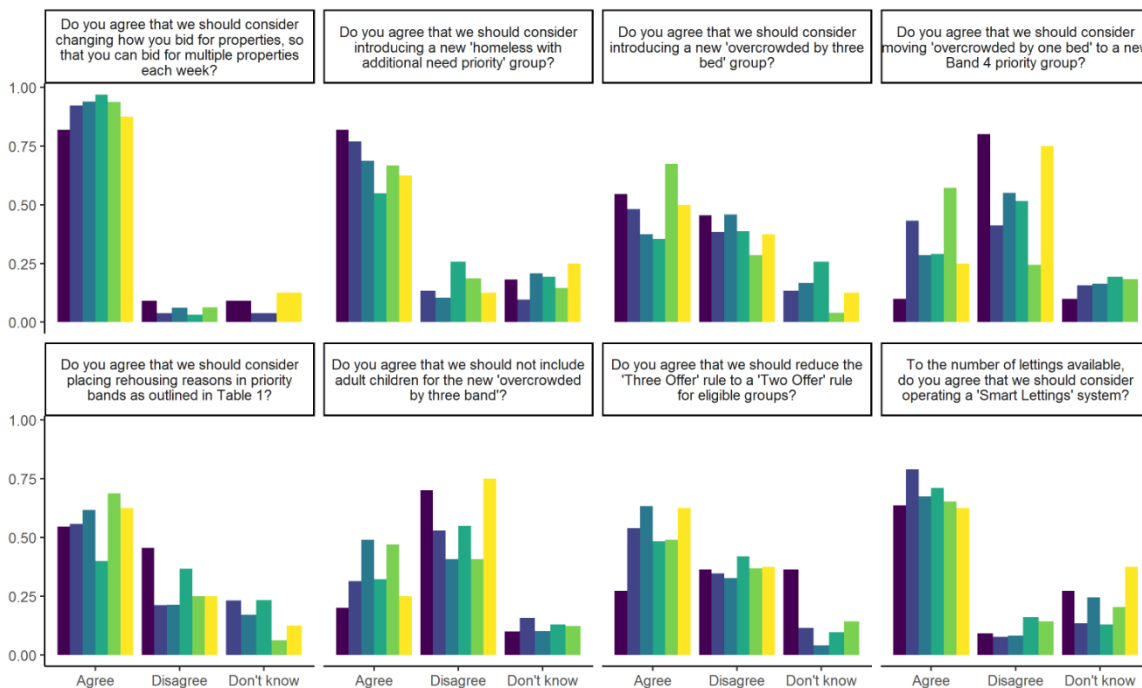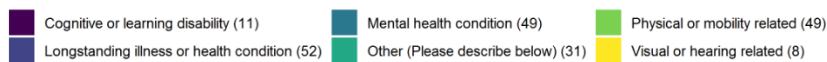
6.37. There was broad agreement to the following proposals from respondents from all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?
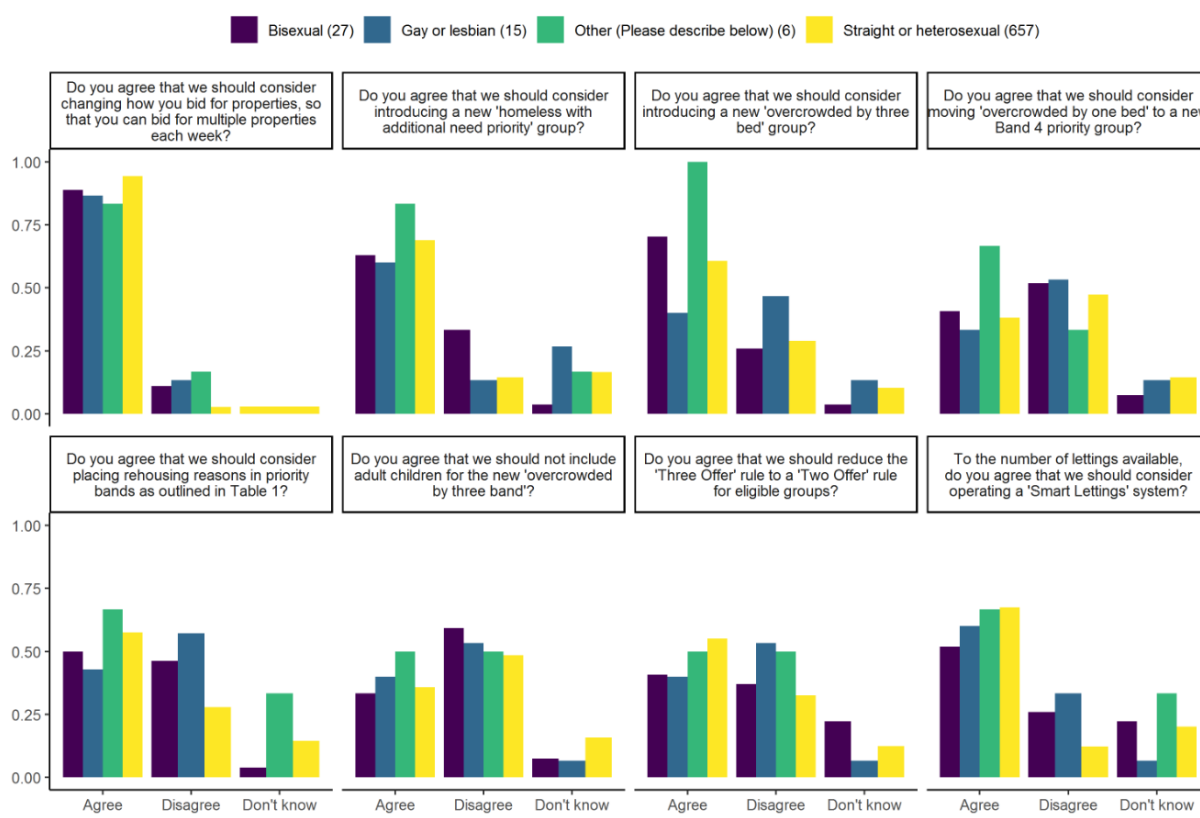
6.38. Respondents with a mental health condition (45.8%) or another condition not listed (38.7%) were more likely to disagree than agree with the proposal to introduce an overcrowded by three bed group. Those with a longstanding illness or health condition were more likely to agree than disagree with this proposal although less than half (48.1%) agreed. All other groups agreed with this proposal by more than 50%.

6.39. 80% of respondents with a cognitive or learning disability, 75% with a visual or hearing related disability, 55.1% with a mental health condition and 51.6% with another condition not listed disagreed with the proposal to move overcrowded by 1 bed households into band 4. 57.1% of those with a physical or mobility related disability agreed with this proposal and slightly more respondents with a longstanding illness or health condition agreed with the proposal (43.1%) than disagreed with it (41.2%).

6.40. Respondents from all groups were more likely to agree than disagree with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, although less than half of those with another condition not listed agreed to this proposal (40%).

6.41. Over half of respondents with a longstanding illness or health condition (52.9%), another condition not listed (54.8%), a cognitive or learning disability (70%) or a visual or hearing related disability (75%) disagreed with the proposal to exclude adult children from the proposed overcrowded by three bed category. Respondents with a mental health condition were more likely to agree (50%) than disagree as were those with a physical or mobility related disability (46.9% agreement).

6.42. Respondents from all groups were more likely to agree with the proposal to reduce the three offer rule to a two offer rule for eligible groups, although less than half of those with another condition not listed (48.4%) were in agreement and 49% of those with a physical or mobility related disability were in agreement.

Sexual Orientation

6.43. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the sexual orientation of the respondents.

Chart 7 – Responses by sexual orientation

How would you define your sexual orientation?

Bisexual (27) Gay or lesbian (15) Other (Please describe below) (6) Straight or heterosexual (657)

6.44. There was broad agreement to the following proposals from respondents from all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.45. Respondents who identify as gay or lesbian were more likely to disagree (46.7%) with the proposal to introduce an overcrowded by three bed category than to agree (40%) with this proposal. Over 50% of respondents in all other groups agreed with this proposal.

6.46. Over half of those who identify as bisexual (51.9%) or gay or lesbian (53.3%) disagreed with the proposal to move overcrowded by 1 bed into band 4. Respondents who identified as straight or heterosexual were more likely to disagree (47.3%) with this proposal than to agree with it (38.2%). More than half of those who identified as other agreed with this proposal.

6.47. 57.1% of respondents who identify as gay or lesbian disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation. 50% of those who identify as bisexual agreed with this proposal and more than half of those who identify as other or as straight or heterosexual agreed with this proposal.

6.48. 50% of those who identify as other disagreed with the proposal to exclude adult children from the determination for overcrowded by three beds, with the remaining 50% agreeing.

All other groups were more likely to disagree than to agree with this proposal, although less than half of those who identify as straight or heterosexual disagreed to it (48.5%).

6.49. More than half of respondents who identify as gay or lesbian (53.3%) disagreed with the proposal to reduce the three offer rule to a two offer rule for eligible households. 50% of those who identified as other agreed with this proposal and 50% disagreed. All other groups were more likely to agree than disagree with this proposal although less than half of those who identify as bisexual (40.7%) agreed.

Religion or Belief

6.50. The chart below shows the breakdown of responses to all of the questions in the survey broken down by the religion or belief of respondents.

Chart 8 – Responses by religion or belief
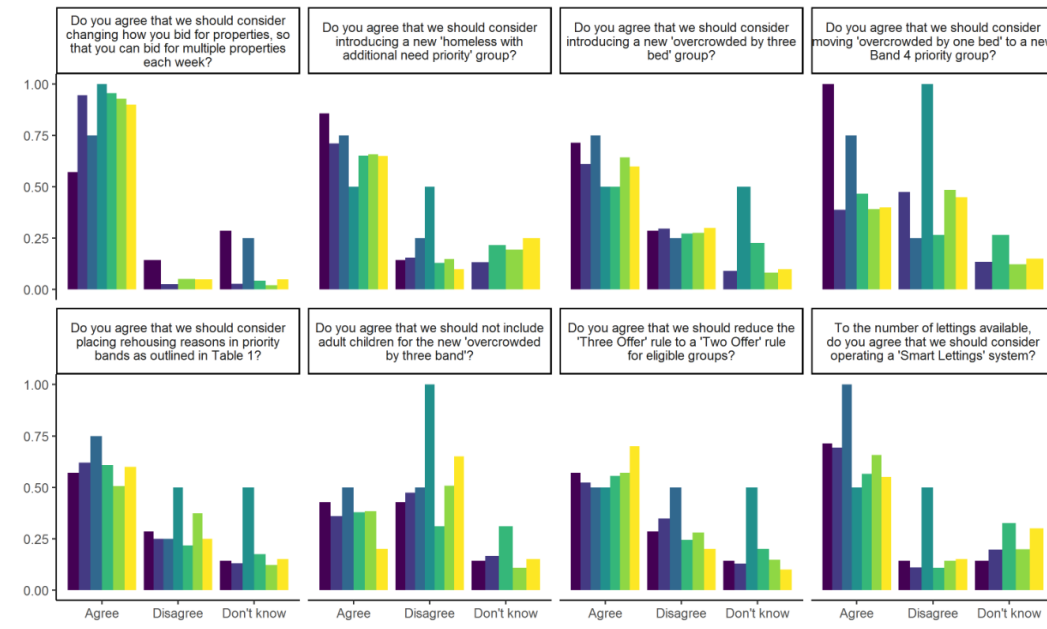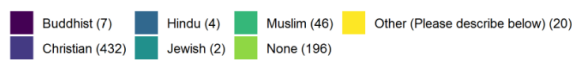
6.51. There was broad agreement to the following proposals from respondents from all groups:
  - Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
  - Do you agree that we should consider introducing a new 'overcrowded by three bed' group?

6.52. Half of the respondents who identify as Jewish agreed with the proposal to introduce a new homeless with additional need priority group with the other half disagreeing. Over half of the respondents in other groups agreed with this proposal.

6.53. Respondents who identify as Christian (47.5%), Jewish (100%), Other (45%) or having no religious belief (48.5%) were more likely to disagree with the proposal to move overcrowding by one bed into band 4 than to agree to it. Respondents who identify as Buddhist (100%), Hindu (75%) or Muslim (46.7%) were more likely to agree to this proposal than to disagree with it.

6.54. Half of the respondents who identify as Jewish disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, with the remaining 50% responding that they did not know. Over half of the respondents in other groups agreed with this proposal.

6.55. 65% of those identifying as other and 50.8% of those identifying as having no religious belief disagreed with the proposal to exclude adult children from the calculation of households overcrowded by three beds or more. Those who identify as Christian were more likely to disagree (47.4%) with the proposal than to agree with it (36%). Equal amounts of respondents who identify as Buddhist or Hindu agreed and disagreed with the proposal. 37.8% of respondents who identify as Muslim agreed with the proposal and 31.1% disagreed.

6.56. Half of the respondents who identify as Hindu agreed with the proposal to reduce the three offer rule to a two offer rule for eligible households, with the remaining half of respondents who identify as Hindu disagreeing with this proposal. 50% or more of respondents from all other groups agreed with this proposal.

6.57. Half of the respondents who identify as Jewish agreed with the proposal to introduce the 'Smart Lettings' policy, with the remaining half of respondents who identify as Jewish disagreeing with this proposal. 50% or more of respondents from all other groups agreed with this proposal.

Gender Identity

6.58. The chart below shows the breakdown of responses to all of the questions in the survey broken down by gender identity.

Chart 9 – Responses by gender identity

Is your gender identity different from the gender you were assigned at birth?
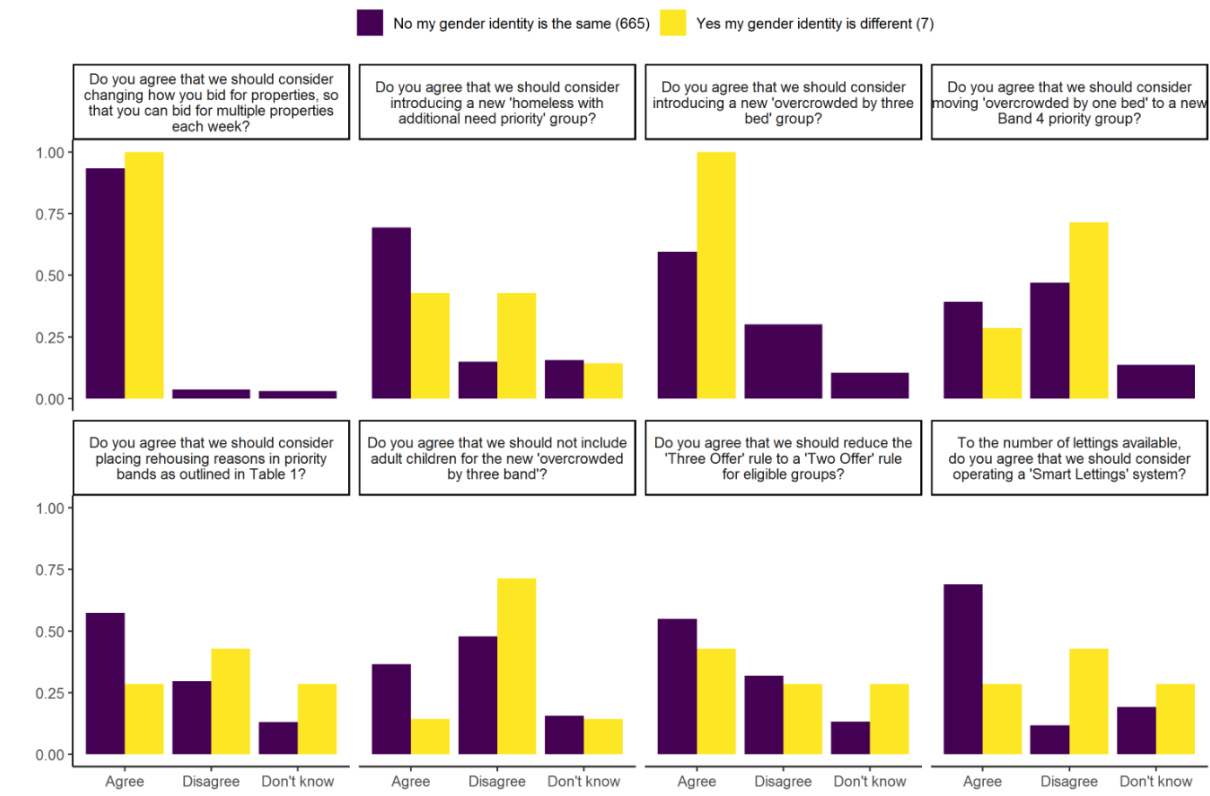
6.59. There was broad agreement to the following proposals from respondents from both groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?

6.60. 42.9% of respondents whose gender identity is different to that assigned at birth agreed with the proposal to introduce a new homeless with additional need category and 42.9% disagreed. 69.5% of those whose gender identity is the same as that assigned at birth agreed with this proposal.

6.61. Respondents from both groups were more likely to disagree with the proposal to move those who are overcrowded by 1 bed into band 4. 71.4% of those whose gender identity is different to that assigned at birth disagree with this proposal and 47% of those whose gender identity is the same as that assigned at birth agree with this proposal.

6.62. Less than half of respondents whose gender identity is different to that assigned at birth (42.9%) disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, however even fewer (28.6%) agreed with the proposal. More than half of those whose gender identity is the same as that assigned at birth agreed with this proposal.

6.63. 71.4% of respondents whose gender identity is different to that assigned at birth disagreed with the proposal to exclude adult children from the calculation for households overcrowded by three bedrooms or more. 47.8% of those whose gender identity is the same as assigned at birth disagreed with this proposal and 36.5% agreed.

6.64. Respondents from both groups were more likely to agree with the proposal to change the three offer rule to a two offer rule for eligible households, however less than half of those whose gender identity is different to that assigned at birth agreed with this proposal (42.9%).

6.65. 42.9% of respondents whose gender identity is different to that assigned at birth disagreed with the proposal to introduce a 'Smart Lettings' policy with 28.6% in agreement. 69% of those whose gender identity is the same as assigned at birth agreed with this proposal.
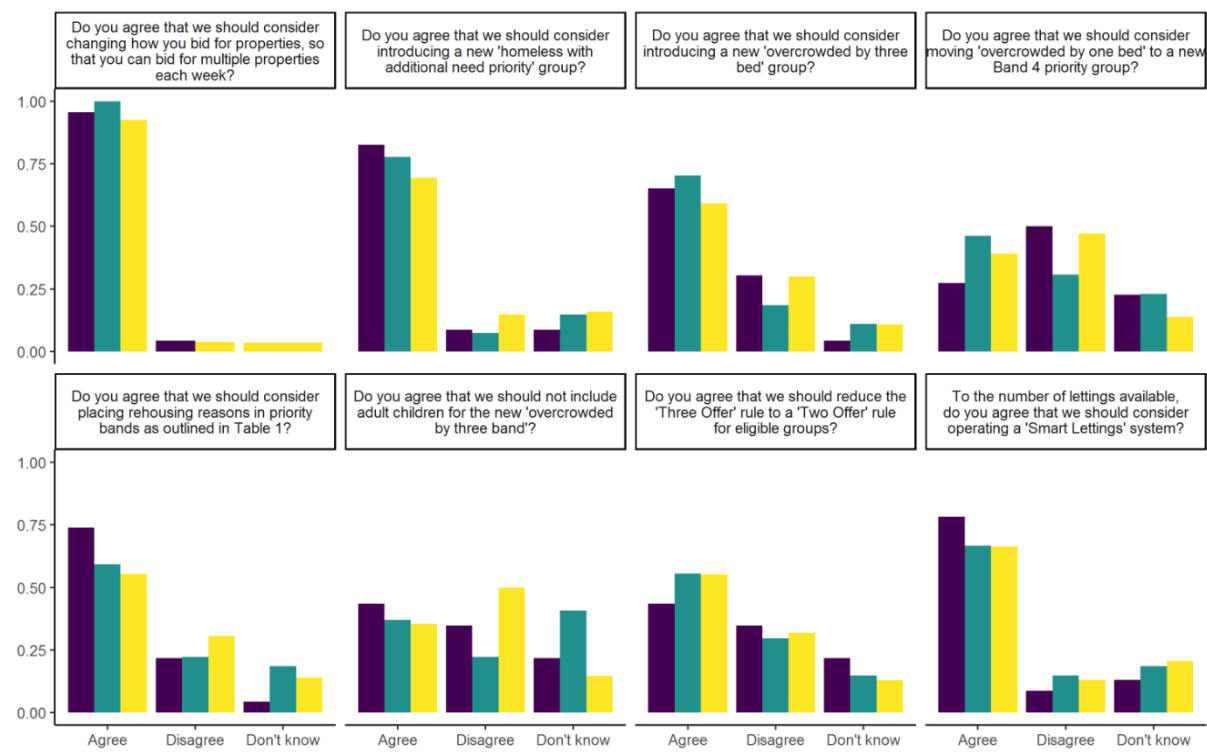
Maternity

6.66. The chart below shows the breakdown of responses to all of the questions in the survey broken down by maternity status.

Chart 10 – Responses by maternity status

Are you pregnant or on maternity leave?

■ I am currently pregnant (23) ■ I have been pregnant in the last six months (27) ■ None of the above (682)

6.67. There was broad agreement to the following proposals from respondents from all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should consider introducing a new 'overcrowded by three bed' group?
- Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.68. Respondents who are currently pregnant were more likely to disagree (50%) with the proposal to move overcrowded by one bedroom into band 4. Those who are not currently pregnant and have not been in the past six months were also more likely to disagree (47.1%) with this proposal. Those who have been pregnant in the last six months were more likely to agree with this proposal than to disagree with it although less than half were in agreement (46.2%).

6.69. 50% of those who are not pregnant and have not been pregnant in the last six months disagreed with the proposal to exclude adult children from the calculation for an overcrowded by three bed house. Those who are currently pregnant were more likely to agree (43.5%) than to disagree (34.8%) with this proposal, as were those who had been pregnant in the last six months (37% agree, 22.2% disagree).

6.70. Less than half of respondents who are currently pregnant agreed with the proposal to reduce the three offer rule to a two offer rule for eligible groups, although they were more likely to agree with this proposal (43.5%) than to disagree with it (34.8%). Over half of respondents in the other groups agreed with this proposal.

<u>Caring responsibilities</u>

6.71. The chart below shows the breakdown of responses to all of the questions in the survey broken down by maternity status.

Chart 11 – Responses by caring responsibilities

Do you provide unpaid care for anybody?

No (570)   Yes (158)
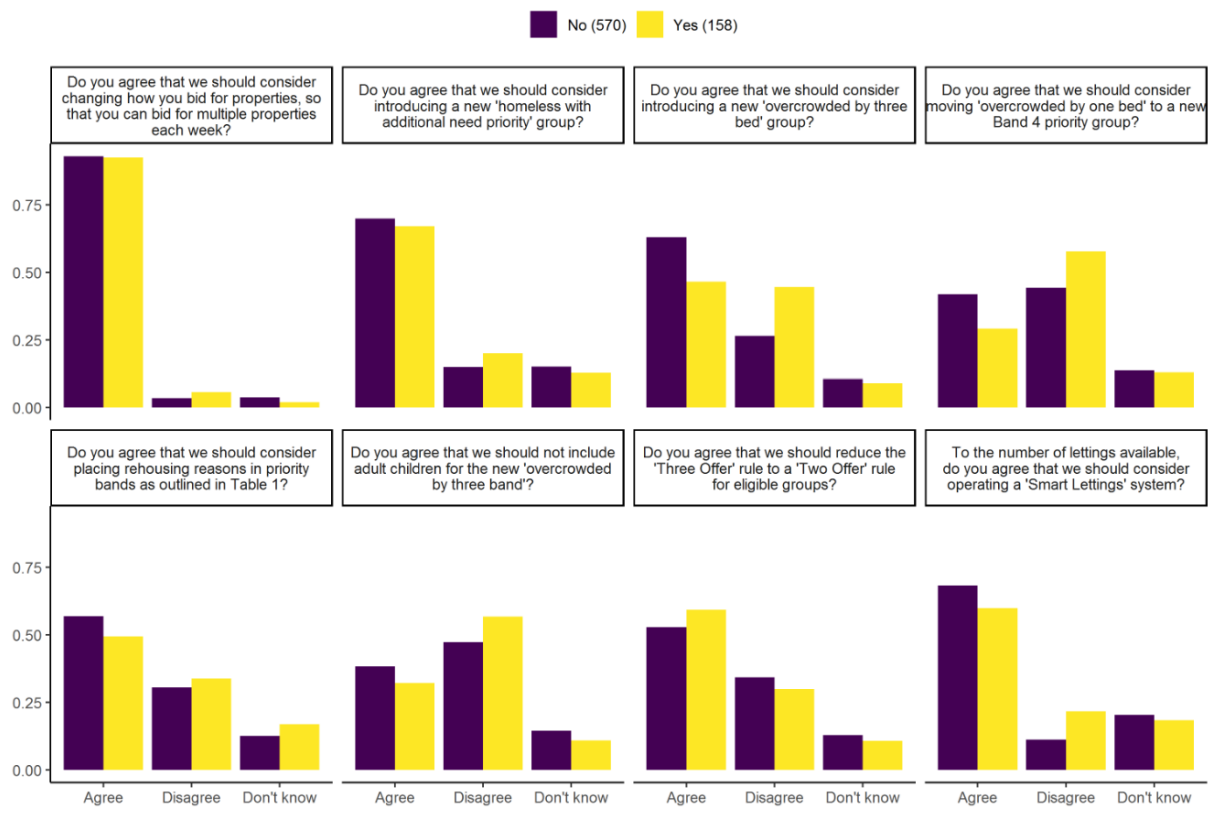
6.72. There was broad agreement to the following proposals from respondents from all groups:
- Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?
- Do you agree that we should consider introducing a new 'homeless with additional need priority' group?
- Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups?
- To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?

6.73. Respondents in both groups were more likely to agree with the proposal to introduce a new overcrowded by three bed group, however slightly less than half of those with caring responsibilities agreed with the proposal (46.5%) with 44.6% disagreeing.

6.74. 57.8% of respondents with caring responsibilities and 44.3% of those without caring responsibilities disagreed with the proposal to move overcrowded by one bed households

into band 4. 29.2% of those with caring responsibilities and 41.9% of those without caring responsibilities agreed with this proposal.

6.75. Both groups were more likely to agree with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, however slightly less than half of those with caring responsibilities (49.4%) agreed with this proposal.

6.76. More than half of respondents with caring responsibilities disagreed with the proposal to exclude adult children from the calculation for overcrowded by 3 bed (56.8%) and 47.2% of those without caring responsibilities disagreed with this proposal (38.3% of those without caring responsibilities agreed).

<u>Homelessness with additional need</u>

6.77. Respondents were asked for their views on the approach the council should take with regards any proposed homeless with additional needs category.

6.78. The majority of those who responded to this question agreed that using some combination of the council's location priority policy and private rented sector discharge policy was the appropriate approach. A substantial minority of respondents felt that just using the location priority policy would be the best approach. A smaller number of respondents proposed using just the private rented sector discharge policy or another approach.

7. **Additional comments**

7.1. There were 2,228 written responses to the proposals that the council included in the consultation. Some of the recurring themes that arose across the proposals are captured in the below bullet points:
   - Consideration should be given to those who have been waiting for social housing the longest;
   - Consideration should be given to prioritising those with multiple rehousing reasons;
   - Written responses were broadly supportive of practical initatives to improve the bidding process however stressed a demand that the policy be clearer;
   - Many respondents advocated for the prioritisation of families where there were physical or mental health needs.

7.2. Comments on each question have been assessed to better understand their general direction and the comments for each proposal have been analysed in detail and are set out below.

7.3. The below chart sets out the general themes of the comments in response to the banding structure proposal.

Chart 12 – Comments on the proposed banding structure

Do you agree that we should consider placing rehousing reasons in new priority bands?
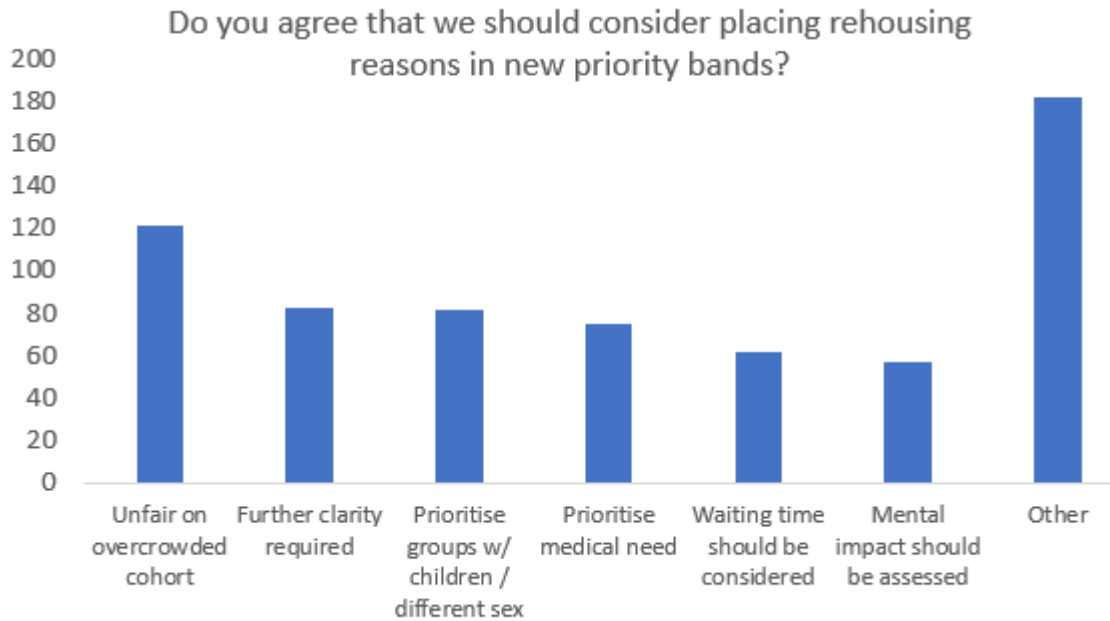
7.4. The most prevalent theme was a concern regarding the impact of the proposed banding on households that are overcrowded. This can be seen in more detail in response to the specific proposal regarding households that are overcrowded by one bed. A number of residents felt that more clarity was required on this proposal whilst others felt that there needed to be nuanced approaches that prioritised households with children of different genders or those with medical need.

7.5. An example of a typical response is given below.

Typical response:

I agree , however I do have concerns regarding the O/C by 1 beds.

As it is they rarely get to move , so by being pushed down a further BAND - to BAND 4 may make them feel that they will never move , unless they have another child , pushing them up to a BAND 3.

I understand that this group is looked at , at a low priority, however most of these tenants are in 1 and 2 bed properties and if more focus was aimed at moving these tenants , then their vacant properties could then be given preference to Homeless groups? and would also create a churn.

7.6. The below chart sets out the general themes of the comments in response to the proposal to introduce a new overcrowded by three bedroom rehousing reason.

Chart 13 – Comments on the proposed overcrowded by three bed rehousing reason

Do you agree we should consider introducing a new overcrowded by 3 bed group
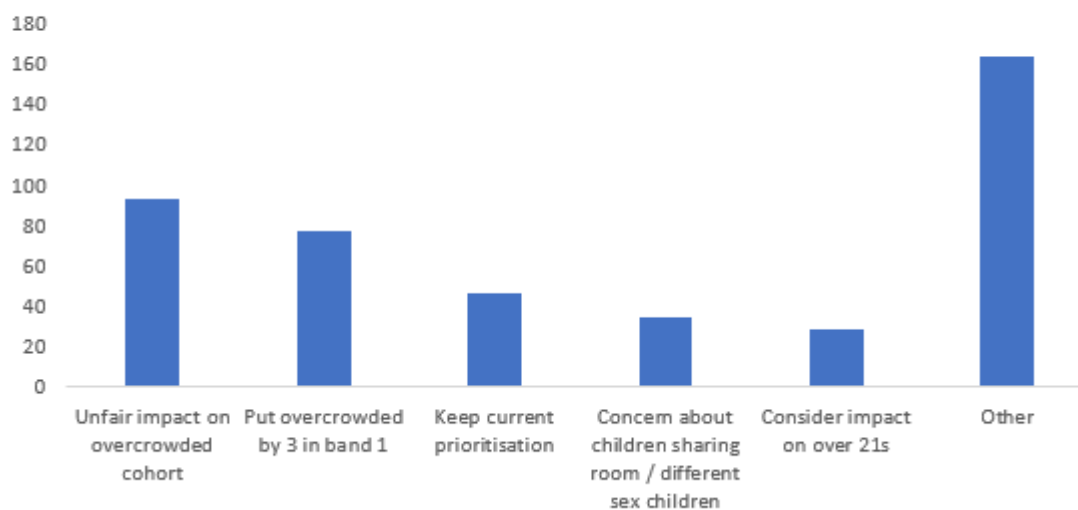
7.7. The most prevalent theme was a concern regarding the impact of the proposed change on overcrowded households. Many respondents commented that overcrowded by 3 bed should be placed into band 1.

7.8. An example of a typical response in support of the proposal, and a typical response in opposition to the proposal, are included below.

Typical response:

I disagree with this because you don't take into consider how many people are sharing the room you only looking at the bedroom need. I currently have a 17 year old daughter sharing with her 15 and 2 year old brothers. By changing my banding your pushing further back on the waiting list. I have been on the waiting list since 2006 and I believe this will be your 4th change. With every change you have made this has pushed me further back on the waiting list and get nowhere even though I bid every week on properties I don't even want.
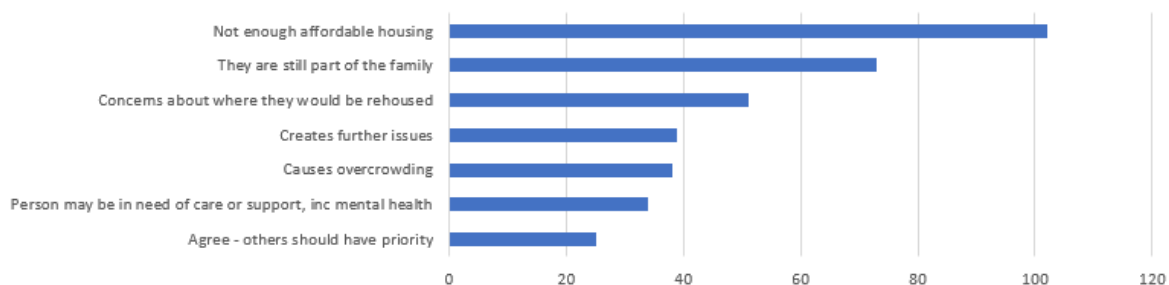
Typical response:

I think this should have been done a long time ago.
I have 3 children and at the moment my daughter is sharing with my son, my daughter is 15 years and my son will be 11years , my other son is sharing with me and he will.be five.
I do understand that there are not enough properties however, the property that I am living in is way too small and my daughter is becoming a young women and my youngest son shouldn't be sharing a room with his Mother at the age of 5.

7.9. The below chart sets out the general themes of the comments in response to the proposal to exclude adult children from the calculation for overcrowded by three bed households.

Chart 14 – Comments on the proposal to exclude adult children from the calculation for overcrowded by three bed households

Do you agree we should not include adult children in the new overcrowded by 3 group?

Not enough affordable housing	
They are still part of the family	
Concerns about where they would be rehoused	
Creates further issues	
Causes overcrowding	
Person may be in need of care or support, inc mental health	
Agree - others should have priority	

(Horizontal axis: 0, 20, 40, 60, 80, 100, 120)

7.10. More respondents disagreed with this proposal than agreed with this and there are a wide range of comments in response. The most prevalent theme was a concern that there is not enough affordable housing to accommodate residents as it is and so excluding individuals from any application would exacerbate this issue. Many respondents also felt that it was not appropriate to exclude adult children from the household as they are still part of the family.

7.11. Examples of typical responses to this question are included below.

Some respondents emphasised that this may cause issues in the system elsewhere, and that the cost of renting in London is prohibitive

Where does the Council expect these adult children to go when there is a shortage of truly affordable housing? It would be ethically wrong to make them homeless in their own right and put them to the bottom of the list. Families should be supported to stay together where they want to be especially as older children may be provided care needs and contributing to household income & Financial help should be offered to young people wanting to move out to ease over-crowding.

Given how unaffordable housing has become, no single person earning less than £30K can afford to rent most properties other than a room in a house - often with no other living space included (I have seen ex-council properties which have been bought (under right to buy) then rented where the owner is so greedy they have converted the lounge to another bedroom! over the past decade - urgent action to turn this around is needed now!

One respondent emphasised the role adult children play in some households

"In same households the adult children support their parents financially with what they earn working… [this will also] create a major childcare issue with some single parents becoming unable to work."

7.12. The below chart sets out the general themes of the comments in response to the proposal to move overcrowded by one bed into band 4.

Chart 15 – Comments on the proposal to move overcrowded by one bed into band 4

Do you agree we should move overcrowded by 1 bed to Band 4?
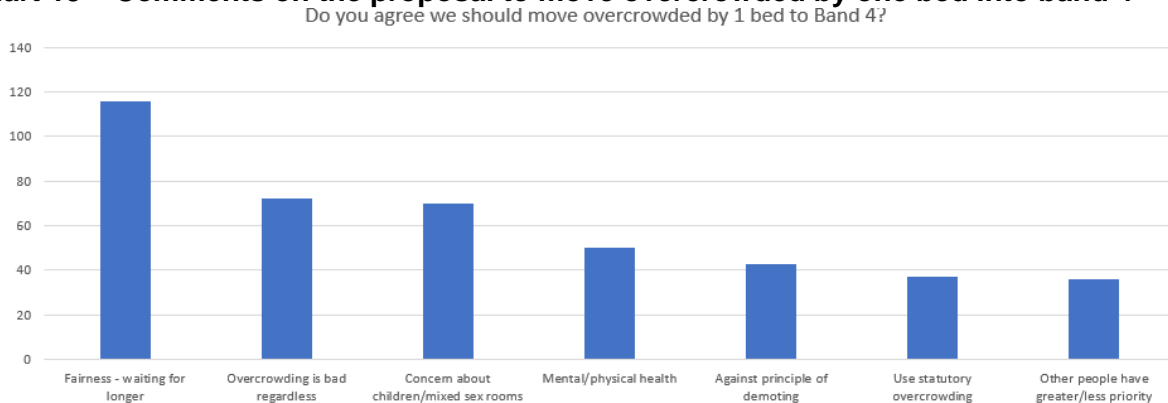
7.13. More respondents disagreed with this proposal than agreed with this and there are a wide range of comments in response. The most prevalent theme was a concern was that this was not fair and would result in many households waiting for longer than they already have. There were also strong concerns expressed that overcrowding is an issue and needs resolving regardless of how many rooms the household is overcrowded by, and reflecting on how household composition is not sufficiently taken into account in this approach.

7.14. Examples of typical responses to this proposal are included below.

This will mean longer waiting times	**Consider statutory overcrowding:**
"This could potentially mean a couple with 3 children in a 2 bedroom property for a long period or time (say on average 9 years) before they are rehoused. With the new rules waiting by time to be rehoused will probably be an average of 15 years. This is not right for the families mental well-being." I think the number of years on the register should be considered as priority for all overcrowded homes	Using the measure of "overcrowded by 1 (or 2, or 3 etc.) bedrooms" ignores factors such as the size of the bedrooms and whether the living room is separate from the kitchen. Simply counting the bedroom number means that a family with an 11 year old girl and boy in a 2 bed/4 person flat and a separate living room and kitchen, have the same priority as a family with a 16 year old girl and two younger boys in a 2 bed/3 person flat with an integrated kitchen living room.

7.15. The below chart sets out the general themes of the comments in response to the proposal to include a homeless with additional need category and how to establish additional need.

Chart 15 – Comments on the proposal to include a homeless with additional need category and how to establish additional need

How should we decide additional need for homeless applications?
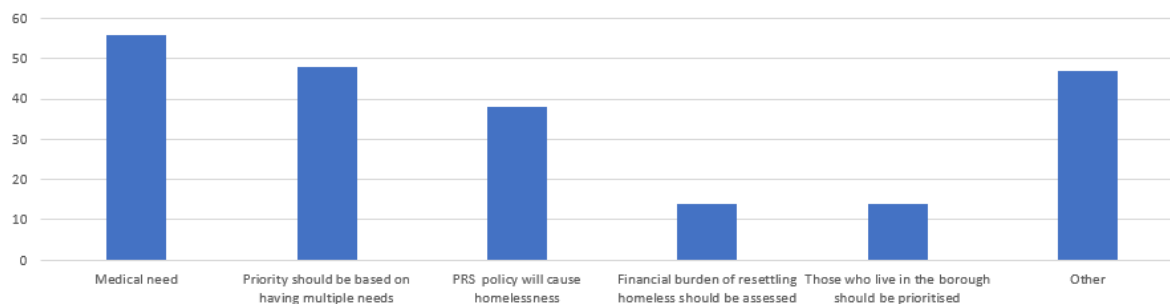
7.16. Where respondents had commented on how best to account for additional need in a homeless with additional need category, the comments primarily focussed on including medical need in that assessment and on the importance of prioritising those with multiple needs. A number of respondents reflect on concerns that the PRS policy of the council and felt that this would cause homelessness.

Examples of some of the range of responses are included below.

How will proving additional need work?

"We are concerned that this may create a 'two-tier' system of priority homeless applicants, who will have to prove additional need in order to be allocated a higher priority band. Proving this needs to be straightforward and accessible for this group, with access to dedicated supports as needed beyond a website FAQ."

LPP is preferable to PRS:

In regards to PRS, we know that many properties are unsuitable for our client group, both in terms of amenities and support. Providing opportunities to access alternatives is key. However, the reasons for why a PRS offer may not be suitable need to be really clear and making this request an easy process for the household.

A combination of both policies would be best to ensure the needs of this group. We would also like to have rough sleeping specifically identified as an additional need.

7.17. A substantial majority of respondents were in support of the proposal to allow multiple bids per property per week. There were some comments from housing providers regarding the technicalities of how this might operate. An example of this is included below:

> **Other improvements to bidding:**
>
> "In principle agree. [However] our residents have raised concerns about the bidding process. This includes ease of access and times properties are added on the system for bids- both of which make it harder for some people to make bids. Residents also raised concerns about multiple viewings and how these can be hard for some people to attend and that the likelihood of being made an offer if they accept could be clearer."

7.18. The below chart sets out the general themes of the comments in response to the proposal to reduce the three offer rule to a two offer rule for eligible groups.

Chart 15 – Comments on the proposal to reduce the three offer rule to a two offer rule for eligible groups

Do you agree that we should reduce "Three Offer" rule to "Two Offer" for eligible groups?
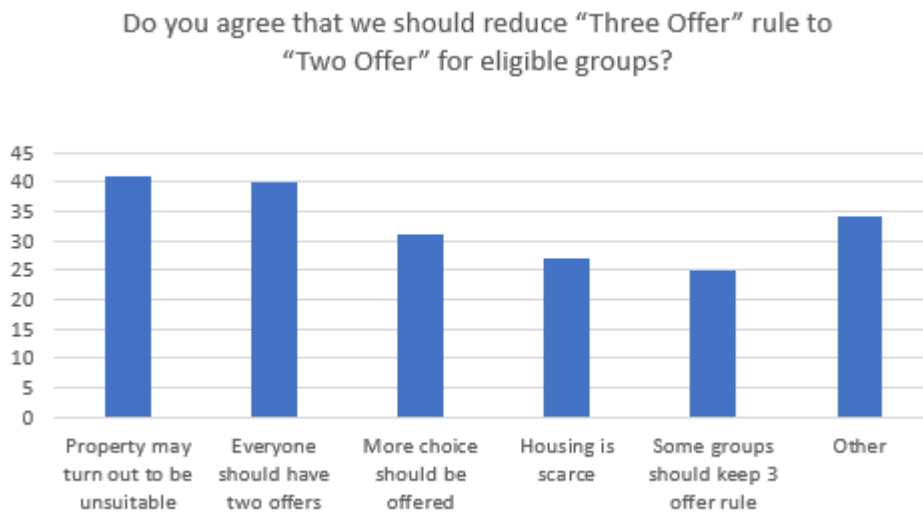
7.19. The most prevalent themes amongst those who commented were that there was a risk in reducing the amount of offers that households are eligible for as households often turn out to be unsuitable upon inspection, and a concern that some households are only eligible for one offer only.

7.20. A typical response is included below.

> **Problems with reducing the number of offers:**
>
> "Whist the resident has bid, they have done so without seeing it, without necessarily knowing the immediate and/or surrounding area very well and without having met or been exposed to neighbours. These are all factors that would normally be able to be considered when relocating. I fully understand that when you are in need it may be argued that you should take what you get, but that may not be the fairest system. Could there be a system which requires the applicant to justify their refusal before the 12 month ban?"

7.21. The majority of respondents agreed with the council proposal to introduce a 'Smart Lettings' policy to generate increased churn for residents on the housing register.

7.22. 45 respondents who opposed this approach made comments reflecting a concern that households already in social housing were being prioritised for housing under this approach.

8. **Written responses**

8.1. An email inbox was highlighted so that respondents and organisations who wanted to email in could do so. Throughout the consultation period 40 emails were sent to this inbox that expressed some view on the consultation. The extent and detail of these written contributions varied, however the key themes are captured below alongside the views of those who contributed at virtual meetings and those who engaged directly in phone consultation with officers.

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

8.2. A number of responses reflected that they were in broad agreement with the proposals in the scheme. Some residents expressed agreement with the banding given the increased priority it would give to some in temporary accommodation, and agreed with the rationale for many of the priority rehousing groups remaining the same.

8.3. There was feedback that it may be required to provide additional clarity on what each group entailed and how someone might qualify for it. A number of contributions also stressed the importance of factoring in multiple needs, and to ensure that households with children were given the highest possible priority.

8.4. The council received some responses from partner organisations that expressed some concerns around the proposed banding. One registered provider suggested that whilst they understood the rationale behind the approach, they felt that the introduction of a band 4 would create unrealistic expectations of rehousing amongst those clients in that band. Another response highlighted a concern around the use of the bedroom standard solely as a mechanism for determining overcrowding and raised the possibility of a more nuanced approach which factored in statutory overcrowding.

8.5. Some written responses from residents and some contributions in the virtual meetings reflected on the length of time it currently took for those on the register to be successful in bidding and noted that these proposals would exacerbate that for some groups, raising fears that they might be on the housing register for longer than they already had been.

<u>Do you agree that we should consider introducing a new 'overcrowded by three bed' group?</u>

8.6. Generally, respondents who wrote in expressed agreement with this proposal where it was explicitly referenced. Respondents recognised the impact of such severe overcrowding and felt it appropriate that some priority was given.

8.7. Respondents did however express some concerns around the proposed overcrowding approach more generally, which is largely addressed under other questions. The concerns in relation to the adoption of this rehousing reason were that the proposed bandings for various groups had a negative impact on other overcrowded households.

<u>Do you agree that we should not include adult children for the new 'overcrowded by three band'?</u>

8.8. Written responses generally disagreed with the proposal to exclude adult children from the proposed overcrowded by three bed category.

8.9. Responses from partner organisations reflected on the confusion that might arise where a household that is assessed as overcrowded by three beds has a child who turns 21 and then they are no longer assessed as such. Other responses from partner organisations suggested that this might not be lawful if applied to homelessness.

8.10. One partner response that suggested some agreement with this proposal did stress that it would require very careful consideration. This response noted that there is a chance that such households might evict adult children in these circumstances and thus have a perverse negative affect on the councils approach elsewhere.

<u>Do you agree that we should consider moving 'overcrowded by one bed' to a new Band 4 priority group?</u>

8.11. There was strong disagreement in the written responses to the proposal to move overcrowded by one bed into a new band 4 category.

8.12. Responses from partner organisations raised concerns about the wide range of overcrowding that can exist within the overcrowded by one bed range and the very challenging circumstances that all overcrowded households live in. Many expressed concern that such a large number of households would be de-prioritised in this approach.

8.13. A number of partners expressed a preference that some consideration be given to the inclusion of statutory overcrowding in any calculation of overcrowding. Others added that the scale and prevalence of overcrowding in Lewisham and the impact on particular groups warranted a more substantive consideration in the proposed scheme. It was recommended that the council undertake a comprehensive equalities analysis assessment before considering this option.

8.14. Many written responses from residents noted that they had been on the housing register for some time and had been unsuccessful in applying for a property despite actively bidding. They added that this proposal would have a substantial impact on the possibility that they might ever secure housing.

8.15. A small number of responses reflected positively on this approach, one example noting that if the council deemed this the correct approach then it was appropriate to do so and that the framing of band 4 as a low priority group would help residents to better understand their likelihood of success.

<u>Do you agree that we should consider introducing a new 'homeless with additional need priority' group?</u>

8.16. Respondents broadly welcomed the proposal to introduce a new 'homeless with additional need' priority, and agreed with the council's intention to find a better way to support homeless households through the register.

8.17. However, there was some concern regarding the proposed mechanisms for doing so. Some partner organisations felt that the options outlined (using the location priority policy, the private rented sector discharge policy, or a combination of the two) were defined too narrowly or in such a way that did not sufficiently prioritise homeless households within the proposed group. There was a concern expressed that this might restrict access to this group for many homeless households meaning longer times in temporary accommodation or increased use of the private rented sector discharge policy.

8.18. Many respondents felt that those with medical needs should be given priority within this cohort, and more generally that medical need plus other housing need should be a determining factor in increased priority.

<u>Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week?</u>

8.19. This proposal was widely support in written responses and in the virtual meetings that were held with residents.

8.20. Respondents on the whole felt that this approach gave applicants a much greater amount of choice when selecting their properties and took away the need to think tactically about where they might place their bid. There was a sense that this might also lead to a decrease in rejections of offers.

8.21. Some comments expressed the need for this to be very carefully considered so as not to create an extensive administrative burden that would undermine the principle of the approach. Similarly it was noted that whatever approach was implemented would need to be very clearly explained and as straightforward as possible to minimise the issues that might arise from multiple selections.

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

8.22. There was a mixed response to this proposal from the written responses and virtual meetings that were held.

8.23. At the virtual meetings that have been held, a number of residents noted that properties are often found to be unsuitable upon inspection and that this proposal might be to the detriment of those households who reject properties that are unsuitable and thus are only left with one further offer. There was concern as to how rejections would be considered in this approach so as not to penalise those who are offered unsuitable properties.

8.24. Other responses reflected on the appropriateness of this proposal given the lack of social housing that is available and the need to ensure properties are let as quickly as possible. A partner organisation noted that this proposal was well aligned with the multi-bid approach, as residents should and can in future apply for any number of properties and so it is perhaps more appropriate that residents bid for properties they definitely would like.

<u>To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system?</u>

8.25.   Respondents were broadly in agreement with the principles set out in the 'Smart Lettings' proposal although some concerns were raised.

8.26.   Many respondents felt that this proposal would benefit a wide range of groups on the register and generate additional churn, which was welcomed. One of our partner organisations suggested that the percentage of properties allocated through this approach could be set even higher to maximise this approach.

8.27.   Some responses however did note that this might be perceived as benefiting those already in social housing to the detriment of others, and allowing some households to 'jump the queue'.