



Housing Select Committee

Report title: Introduction of a new Location Priority Policy

Date: 20 January 2022

Key decision: Yes.

Class: Part 1

Ward(s) affected: All

Contributors: Fenella Beckman, Director of Housing Services

Outline and recommendations

Housing Select Committee are asked to review the report and the proposed policy and to provide comments.

Housing Select Committee are asked to support the approval of this policy by Mayor and Cabinet.

Timeline of engagement and decision-making

11 November 2015	Mayor and Cabinet approval of Location Priority Policy and Procurement Strategy
18 November 2019	Housing Select Committee review of Out of Borough Placements
12 March 2020	Housing Select Committee review of Homelessness in Lewisham
11 and 18 November 2020	Housing Select Committee and Mayor and Cabinet approved proposed Allocations Policy changes, with recommendation for Public Consultation
27 November 2020 – 14 March 2021	Public Consultation
7 June 2021	Allocations Policy Consultation report presented to Housing Select Committee
16 September 2021	Revised Allocations Policy presented to Housing Select Committee
6 October 2021	Allocations Policy Consultation report and Revised Allocations Policy approved by Mayor and Cabinet

1. Summary

- 1.1. This report details the reason that Lewisham is required to have a Location Priority Policy and the rationale behind the proposed policy.
- 1.2. It also contains a summary of the key changes that are proposed to the policy.
- 1.3. The proposed Location Priority Policy is included as Appendix 1.

2. Recommendations

- 2.1. Housing Select Committee are asked to review the report and the proposed policy and to provide comments.
- 2.2. Housing Select Committee are asked to support the approval of this policy by Mayor and Cabinet.

3. Policy Context

- 3.1. The contents of this report are consistent with the Council's policy framework. It supports the achievements of the Corporate Strategy objectives:
 - 3.1.1. Tackling the housing crisis – Everyone has a decent home that is secure and affordable.
- 3.2. The contents of this report support the achievement of the following Housing Strategy 2020-26 objectives:
 - 3.2.1. Preventing Homelessness and meeting housing need;

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3.2.2. Strengthening communities and embracing diversity.

3.3. The contents of this report also support the achievement of the following Homelessness Strategy 2020-22 objectives:

3.3.1. Support people to access a stable and secure home.

4. Background

- 4.1. Mayor and Cabinet approved a Location Priority Policy and Procurement Strategy on 11th November 2015.¹
- 4.2. The Council strives to make all placements in borough or as close to borough as possible. The Location Priority Policy sets out how the council will prioritise the allocation of the temporary accommodation that is available.
- 4.3. The Procurement Strategy sets out the approach that the council will take to ensure it secures enough accommodation to meet the anticipated demand.
- 4.4. There has been a substantial change in demand over this time. In September 2015 the council was accommodating 1,741 households in temporary accommodation of which 583 were in nightly paid accommodation. As of the end of December 2021 the council was accommodating 2,666 households in temporary accommodation of which 874 were in nightly paid accommodation.
- 4.5. In November 2019, Housing Select Committee reviewed a paper on Out of Borough placements and made comments on the policy and practice of the Council.
- 4.6. Mayor and Cabinet approved a revised Allocation Policy in October 2021. The report set out the need to review the Location Priority Policy and the Private Rented Sector Offer policy prior to implementation of the new Allocations Policy.
- 4.7. A number of changes to the Location Priority Policy have been proposed: due to the importance of the Location Priority Policy in the new Allocations Policy; a change in local needs; and broader changes to some of the characteristics assessed in the policy.
- 4.8. No material changes are proposed to the existing Private Rented Sector Offer policy, therefore this policy is not currently being presented for discussion.
- 4.9. An updated Procurement Strategy will be presented for discussion to a future Housing Select Committee meeting.

5. The Location Priority Policy

- 5.1. Section 208 of the Housing Act 1996 requires that 'so far as reasonably practicable' local authorities should accommodate homeless households in borough.²
- 5.2. The scale of the housing crisis is such that it is not always possible to accommodate households within Lewisham. A combination of high demand and limited supply mean that many households are accommodated out of the borough.
- 5.3. The Supreme Court judgment in the case of *Nzolameso v Westminster City Council* required local authorities to have "a policy for procuring sufficient units of temporary accommodation secondly, each local authority should have and keep up to date, a policy for allocating those units to individual homeless households."³
- 5.4. Section 17 of the Homelessness Code of Guidance sets out some of the

¹ <https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CIId=139&MIId=3861&Ver=4>

² <https://www.legislation.gov.uk/ukpga/1996/52/section/208>

³ <https://www.supremecourt.uk/cases/uksc-2014-0275.html>

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considerations that an authority should take into account in its policy, including but not limited to matters such as education, employment and medical need.⁴

- 5.5. The Location Priority Policy presently effect in Lewisham was approved in November 2015 and reflects Lewisham’s approach to allocating temporary accommodation in a manner consistent with the decision in Nzolameso v Westminster City Council.
- 5.6. The policy sets out that whilst the council will always seek to place a household in borough if possible, households may be allocated accommodation outside of the borough, and establishes criteria by which households will be prioritised for in-borough accommodation or accommodation closer to the borough.
- 5.7. Households that are prioritised for an in-borough placement under the current policy have a substantial need linked to education, health or wellbeing that cannot be satisfactorily met should the household be moved out of borough.⁵
- 5.8. Households that are prioritised for a close to borough placement under the current policy are those where the household has employment in borough or where a member of the household is in the final years of their education for certain examinations.
- 5.9. Households that do not meet these criteria are awarded no location priority policy.
- 5.10. The current policy sets out that a close to borough placement is one that is within 90 minutes travelling distance by public transport.
- 5.11. The below table sets out the percentage breakdown of location priority policy awards since the introduction of the Homelessness Reduction Act in April 2018. Over two thirds of households were assessed to have either an in-borough priority or a within 90 minutes priority in 18/19 and 19/20. This changed in 20/21 as a consequence of the shift in demand due to the Pandemic. More single households approached for support during 20/21, and they are more likely to fall into the no location priority cohort.

	A. Location Priority - In Borough	B. Location Priority - 90 mins	C. No Location Priority
18/19	21.6%	49.2%	29.1%
19/20	20.6%	52.1%	27.3%
20/21	22.8%	42.0%	35.2%

- 5.12. In reality, recent analysis suggests that far greater proportions of households are being accommodated in or close to borough when compared to their designated Location Priority. Therefore, even where the policy does currently allow for households to be located further away, in the majority of cases, accommodation is found nearer to Lewisham.
- 5.13. The below table shows all TA placements by area as at December 2021. The vast majority of placements are within Lewisham and neighbouring boroughs, with 3% outside of London.

Area	TA placements	% of total
Lewisham	1652	64%
SE London (Bexley, Bromley, Croydon, Greenwich, Lambeth, Southwark)	580	22%
Rest of London	269	11%
Outside of London	88	3%

⁴ <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-17-suitability-of-accommodation>

⁵ <https://lewisham.gov.uk/-/media/location-priority-policy.ashx>

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- 5.14. It should be noted that a number of these out of London placements include locations such as Dartford, Sevenoaks and Medway which are in relatively close proximity to Lewisham and Catford which travelling by public transport, in contrast with areas within North West London which are a greater travelling distance away. Flexibility in the policy will be allowed in order to accommodate households in areas such as Dartford, if a household wishes to be accommodated there, rather than other areas within Greater London.
- 5.15. In March 2017 Mayor and Cabinet agreed a Private Rented Sector Offer Policy that sets out how the Council will bring the main housing duty to an end for households where it has secured a suitable home in the private rented sector. The policy sets out that the council will use the Location Priority Policy when making such offers.

6. Proposed Changes

- 6.1. In 2019, Housing Select Committee received a report on Out of Borough Placements and the Vice-Chair subsequently made a number of recommendations for consideration. These were:
 - 6.1.1. The Location Priority Policy is used to determine appropriateness of private rented sector discharge but it is not made clear in the Priority Policy that it will be used as such. The policy should be amended to reflect this;
 - 6.1.2. Carers who are not part of a household are afforded in-borough priority, but the cared for are not. Further to this, the policy is restricted to family members and is only applicable where the resident is in receipt of Carer's allowance and not whether the resident receives Disability Living Allowance or Personal Independence Payments at a level sufficient to trigger the allowance;
 - 6.1.3. The 90 minute 'close to borough' priority is afforded to a number of groups for whom a placement so far away may come at burdensome expense or fundamentally take too long i.e. those in employment that cannot be moved, or those in exam year at school;
 - 6.1.4. AS Levels no longer exist and the two year nature of GCSE's and A-Levels mean that households should be awarded the priority if their household has a member either in GCSE or A level year, or the year immediately prior.
- 6.2. The COVID-19 pandemic meant that this review has been paused for some time. It is now an appropriate time to review the policy, given the inclusion of the Location Priority Policy in determining priority banding for Homeless households on the Housing Register, and its role in identifying appropriate locations for discharge of duty through the use of a Private Rented Sector Offer.
- 6.3. It is proposed that the Location Priority Policy awards remain as:
 - 6.3.1. Priority A - Priority to be located in the London Borough of Lewisham;
 - 6.3.2. Priority B – Priority to be located close to the London Borough of Lewisham
 - 6.3.3. Priority C - No priority as to the location of the property.
- 6.4. A number of changes are proposed in order to:
 - 6.4.1. Make explicit reference within the Location Priority Policy regarding its use in Private Rented Sector discharges. Namely that policy will also be used to identify appropriate locations where the council will consider discharging the main housing duty under s.193 Housing Act 1986 through the use of a Private Rented Sector Offer.
 - 6.4.2. Award in-borough priority to those who are in receipt of care through a longstanding

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arrangement. Those being cared for must be in receipt of the Daily Living Component of the Personal Independence Payment or the middle or highest care rate of the Disability Living Allowance.

- 6.4.3. Move away from the Priority B 90 minutes travelling time criteria. The proposal is for Priority B, close to borough priority to be defined as within the Greater London area, with provision made for placement outside of Greater London where there are exceptional circumstances, and for a yearly review to be carried out in order to assess the impact of the policy in terms of customer satisfaction and cost.
- 6.4.4. Remove references to AS Levels and take into account the two-year nature of GCSEs and A-Levels, so that close to borough priority is awarded to households where children are enrolled in GCSE or A level courses in the London Borough of Lewisham, with public exams to be taken in the current or next academic year.
- 6.5. Officers will endeavour to place all households within or as close as possible to the London Borough of Lewisham. The policy does not prevent a household from considering other housing options, including asking the council for advice, support and assistance in relocating to more settled accommodation.
- 6.6. The Council will have due regard to the principal needs of any children in the household, and the need to safeguard and promote the children's welfare. In particular, regard will be had to any disruption to schools, medical care, social work, other key services and other support.
- 6.7. The award of any location priority does not guarantee the provision of temporary accommodation within those areas, rather priority for such accommodation should it be available and suitable.
- 6.8. This work supports the implementation of the revised Allocations Policy, alongside the recent implementation of a new integrated housing system.

7. Next Steps

- 7.1. Officers will develop a comprehensive communications plan to inform applicants about the changes. This will explain why changes have been made and set out how to make representations should they believe the change to be incorrect.
- 7.2. An updated Procurement Strategy will be presented for discussion at Housing Select Committee in March 2022 and subsequently to Mayor and Cabinet for approval.
- 7.3. Officers will continue to closely monitor the policies after implementation. This will allow any issues that arise to be addressed promptly. Officers will also continue to monitor allocations to ensure that the Allocations Policy is delivering against its objectives. An annual outturn report will be presented to Housing Select Committee for scrutiny.

8. Financial implications

- 8.1. As has been previously narrated and outlined in this report, the current housing issues experienced both nationally and in the borough are putting severe pressure on the council's housing allocations and budgets. There are significant costs associated with housing generally, including managing the allocations service, managing the provision of council housing and providing services to those experiencing homelessness or the threat of homelessness.
- 8.2. All of these are affected over time by the demand for housing. The allocations policy, which includes the Location Priority Policy, is the means by which that demand is allocated to existing properties.
- 8.3. The allocations policy, including the Location Priority Policy, assists in managing those

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pressures and helps officers to make the best use of the resources available to them.

- 8.4. However, the change from the 90 minutes close to borough requirement to 'Greater London', as a location could put additional pressure on the Housing services budget as Greater London rents tend to be more expensive than locations outside of the London region. This could increase the net cost of placements over time, depending on which London locations clients are placed.

9. Legal implications

- 9.1. The implications of the decision of the Supreme Court in *Nzolameso v Westminster City Council* have been set out in this report. There are two main groups of applicants to whom the Council owes a duty to source accommodation on a temporary basis, those to whom a Children Act 1989 duty is owed, following assessment, and those to whom a homelessness duty is owed, pursuant to the 1996 Act and Guidance.
- 9.2. Sections 206 and 208 of the Housing Act 1996 ["the 1996 Act"] impose distinct but related requirements upon the local authority.
- 9.3. Section 206(1) provides that the authority may discharge their housing functions only by securing "suitable" accommodation, albeit by a variety of routes.
- 9.4. Section 208(1) provides that: "So far as reasonably practicable a local housing authority shall in discharging their housing functions under this Part secure that accommodation is available for the occupation of the applicant in their district".
- 9.5. By virtue of section 205(1) of the 1996 Act, their "housing functions" refers to their functions under Part 7 to secure that accommodation is available for a person's occupation. It is clear, therefore, that these are duties owed to the individual person to whom the main homelessness duty is owed. The accommodation offered has to be suitable to the needs of the particular homeless person and each member of her household and the location of that accommodation can be relevant to its suitability; this has since been fleshed out in statutory guidance.
- 9.6. Under section 182(1) of the 1996 Act, local housing authorities are required to have regard to such guidance as may from time to time be given by the Secretary of State. The current general guidance is contained in the Homelessness Code of Guidance for Local Authorities (Department for Communities and Local Government, 2006). As to the duty in section 208(1), this provides: "16.7. Section 208(1) requires housing authorities to secure accommodation within their district, in so far as is reasonably practicable. Housing authorities should, therefore, aim to secure accommodation within their own district wherever possible, except where there are clear benefits for the applicant of being accommodated outside of the district. This could occur, for example, where the applicant, and/or a member of his or her household, would be at risk of domestic or other violence in the district and need to be accommodated elsewhere to reduce the risk of further contact with the perpetrator(s) or where ex-offenders or drug/alcohol users would benefit from being accommodated outside the district to help break links with previous contracts which could exert a negative influence."
- 9.7. As to suitability, the Code says this about the location of the accommodation: "17.41. The location of the accommodation will be relevant to suitability and the suitability of the location for all the members of the household will have to be considered. Where, for example, applicants are in paid employment account will need to be taken of their need to reach their normal workplace from the accommodation secured. The Secretary of State recommends that local authorities take into account the need to minimise disruption to the education of young people, particularly at critical points in time such as close to taking GCSE examinations. Housing authorities should avoid placing applicants in isolated accommodation away from public transport, shops and other facilities, and, wherever possible, secure accommodation that is as close as possible to

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where they were previously living, so they can retain established links with schools, doctors, social workers and other key services and support essential to the well-being of the household.”

- 9.8. This has since been expanded upon. Under section 210(2), the Secretary of State may by order specify (a) the circumstances in which accommodation is or is not to be regarded as suitable, and (b) the matters to be taken into account or disregarded in determining whether accommodation is suitable for a person. During the passage of the Localism Act 2011, the Government undertook “to remain vigilant to any issues that arose around suitability of location”. It had come to light that some local authorities were seeking accommodation for households owed the main homelessness duty “far outside their own district”. The Government was therefore “willing to explore whether protections around location of accommodation need to be strengthened and how this might be done” (Department for Communities and Local Government, Homelessness (Suitability of Accommodation) (England) Order 2012 – Consultation, May 2012, para 38). A full consultation exercise showed widespread support for strengthening that protection (Department for Communities and Local Government, Homelessness (Suitability of Accommodation)(England) Order 2012 – Government’s Response to Consultation, November 2012): “Government has made it clear that it is neither acceptable nor fair for local authorities to place households many miles away from their previous home where it is avoidable. Given the vulnerability of this group it is essential that local authorities take into account the potential disruption such a move could have on the household.”
- 9.9. The method chosen was to make it a matter of statutory obligation to take the location of the accommodation into account when determining whether accommodation is suitable. Hence, in October 2012, shortly before the decisions were taken in this case, the Secretary of State made the Homelessness (Suitability of Accommodation) (England) Order 2012 (SI 2012/2601).
- 9.10. Article 2 provides: “In determining whether accommodation is suitable for a person, the local housing authority must take into account the location of the accommodation, including - (a) where the accommodation is situated outside the district of the local housing authority, the distance of the accommodation from the district of the authority; (b) the significance of any disruption which would be caused by the location of the accommodation to the employment, caring responsibilities or education of the person or members of the person’s household; (c) the proximity and accessibility of the accommodation to medical facilities and other support which - (i) are currently used by or provided to the person or members of the person’s household; and (ii) are essential to the wellbeing of the person or members of the person’s household; and (d) the proximity and accessibility of the accommodation to local services, amenities and transport.”
- 9.11. The Government’s response to consultation had emphasised that the Order “does not prevent or prohibit out of borough placements where they are unavoidable nor where they are the choice of the applicant”. However, the Department also issued Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation) (England) Order 2012 (November 2012), which strengthened the obligation to secure accommodation as close as possible to where the household had previously been living:
- 9.11.1. “48. Where it is not possible to secure accommodation within district and an authority has secured accommodation outside their district, the authority is required to take into account the Page 9 distance of that accommodation from the district of the authority. Where accommodation which is otherwise suitable and affordable is available nearer to the authority’s district than the accommodation which it has secured, the accommodation which it has secured is not likely to be suitable unless the authority has a justifiable reason or the applicant has specified a preference.

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- 9.11.2. 49. Generally, where possible, authorities should try to secure accommodation that is as close as possible to where an applicant was previously living. Securing accommodation for an applicant in a different location can cause difficulties for some applicants. Local authorities are required to take into account the significance of any disruption with specific regard to employment, caring responsibilities or education of the applicant or members of their household. Where possible the authority should seek to retain established links with schools, doctors, social workers and other key services and support.” (Emphasis supplied).
- 9.12. The guidance goes on to deal with employment, caring responsibilities, education, medical facilities and other support, and also with cases where there may be advantages in the household being accommodated somewhere outside the local authority’s district, including employment opportunities there.
- 9.13. The effect, therefore, is that local authorities have a statutory duty to accommodate within their area so far as this is reasonably practicable. “Reasonable practicability” imports a stronger duty than simply being reasonable. But if it is not reasonably practicable to accommodate “in borough”, they must generally, and where possible, try to place the household as close as possible to where they were previously living. There will be some cases where this does not apply, for example where there are clear benefits in placing the applicant outside the district, because of domestic violence or to break links with negative influences within the district, and others where the applicant does not mind where she goes or actively wants to move out of the area. The combined effect of the 2012 Order and the Supplementary Guidance changes, and was meant to change, the legal landscape as it was when previous cases dealing with an “out of borough” placement policy, such as R (Yumsak) v Enfield London Borough Council [2002] EWHC 280 (Admin), [2003] HLR 1, and R (Calgin) v Enfield London Borough Council [2005] EWHC 1716 (Admin), [2006] HLR 58, were decided.
- 9.14. An applicant who is dissatisfied with any of the local authority’s decisions listed in section 202(1) of the Act can request a review of that decision. The decisions listed do not in terms include a decision to place “out of borough” despite section 208(1). But they do include, at (f), any decision of a local housing authority as to the suitability of accommodation offered in discharge of their duty under, inter alia, section 193(2). They also include, at (b), any decision as to what duty (if any) is owed, inter alia, under section 193(2). It is common ground that (b) includes a decision that the duty is no longer owed because it has been discharged.
- 9.15. Under section 204, an applicant who has requested a review under section 202 and is dissatisfied with the decision may appeal to a county court “on any point of law arising from the decision” (alternatively, if the review decision has not been notified within the prescribed time, arising from the original decision).
- 9.16. The position with respect to the Councils duties pursuant to ss17 and 20 of the Children Act 1989 are that:
- 9.16.1. (s17) It is a general duty of every local authority (a) to safeguard and promote the welfare of children within their area who are in need; and (b) so far as is consistent with that duty, to promote the upbringing of such children by their families, by providing a range and level of services appropriate to those children’s needs. These services can include accommodation.
- 9.17. Before giving any assistance or imposing any conditions, a local authority shall have regard to the means of the child concerned and of each of his parents.
- 9.18. Children in need are those who are unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority; whose health or development is likely to be significantly impaired, or further impaired, without the

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provision of such services; or who are disabled.

- 9.18.1. (s20) Every local authority shall provide accommodation for any child in need within their area who appears to them to require accommodation as a result of (inter alia)— the person who has been caring for him being prevented (whether or not permanently, and for whatever reason) from providing him with suitable accommodation or care.
- 9.19. It is of note that the facts of the Westminster case are significantly stark: the parent had health issues, and it may seem to observers that the decision to refuse accommodation pending appeal, under their housing duties, and then to refuse accommodation to the family pursuant to s 17 Children Act 1989, restricting their support to the children alone under s20, then to split the sibling group and commence care proceedings, should have prompted a review of the family's situation as a whole focussing upon the children's welfare. However, that is not the course that Westminster pursued, with good cause or not. The Supreme Court did not comment upon the child protection issues, if any. They did however consider the issues relating to the children's welfare very strongly in the light of the overall duties owed to the children flowing from s11(2) Children Act 2004, which states that the Local Authority, in the discharge of their functions, (in this case their housing function under the 1996 Act) must make arrangements for ensuring that they have regard to the need to safeguard and promote the welfare of children, including in their arrangements with other agencies.
- 9.20. Thus s11 imposes a similar duty upon a local authority to carry out their functions in a way which takes into account the need to safeguard and promote the welfare of children.
- 9.21. The Supreme Court in Westminster laid emphasis upon that need to promote as well as safeguard the welfare of children flowing from s11.
- 9.22. It is also the case that there will almost always be children affected by decisions about where to accommodate households to which the main homelessness duty is owed. Such households must, by definition, be in priority need, and most households are in priority need because they include minor children. The local authority may have the invidious task of choosing which household with children is to be offered a particular unit of accommodation. "This does not absolve the authority from having regard to the need to safeguard and promote the welfare of each individual child in each individual household, but it does point towards the need to explain the choices made, preferably by reference to published policies setting out how this will be done" (my emphasis)
- 9.23. Such a duty under s11 is therefore a "have regard" duty. It is arguable (and will no doubt be subject to further litigation) the extent to which such a duty is owed to any individual child.
- 9.24. However, as things stand, any policy in relation to the procurement, allocation and eligibility of temporary or more settled housing for families, should have due regard to the general duties imposed under s11, as well as the assessed individual needs of each child under s17 Children Act 1989.

10. Equalities implications

- 10.1. A draft Equalities Analysis Assessment has been completed and is included at Appendix 2. It will be finalised prior to the report being presented to Mayor and Cabinet for approval.

11. Climate change and environmental implications

- 11.1. There are no anticipated climate change and environmental implications.

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12. Crime and disorder implications

- 12.1. There are no anticipated crime and disorder implications.

13. Health and wellbeing implications

- 13.1. The Location Priority Policy gives in borough preference to residents with medical need, classified as under-going treatment for a physical or mental health condition, which cannot be transferred. It also gives preference to children subject to a Child Protection Plan, an Education Health and Care Plan or a Statement of Educational Needs in the London Borough of Lewisham, which cannot be transferred to another local authority. Those in receipt of care or those caring for someone outside of their household through longstanding arrangements are also given preference for allocations in-borough.

14. Appendices

- 14.1. Appendix 1: Proposed Location Priority Policy
14.2. Appendix 2: Equalities Analysis Assessment

15. Background papers

- 15.1. Current Location Priority Policy – approved by Mayor and Cabinet in 2015

16. Report author and contact

- 16.1. Fenella Beckman, Director of Housing, 020 8314 8632;
Fenella.Beckman@lewisham.gov.uk
- 16.2. Comments for and on behalf of the Executive Director for Corporate Resources:
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