

Consultation on Trafford Council's Allocations Policy 2013

Summary of Responses

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Trafford Council consulted on its new Allocations Policy 2013 via the Council website, e - mail and post. Consultation ran for 12 weeks from 10th May until 2nd August 2013.

During the consultation period 85 people responded: 24 responses online, 1 written response, and 3 consultation events with 60 people attending.

The responses received were broadly in support of the aims and objectives of the Policy. The Policy has been amended to incorporate suggested changes.

1. Background

The Council is changing the way that social housing is allocated in Trafford.

This Allocations Policy 2013 sets out how Trafford Council will nominate households to all Registered Providers – RPs (commonly known as Housing Associations) in the Borough. It is being revised following consultation with Registered Providers, other stakeholders, and online consultation.

2. Outcome of the consultation

24 responses were received online (those responding could indicate more than one category).

Table 1: Type of respondent:

Respondent	No. of responses	% of total
Resident	10	37%
Live outside Trafford	4	15%
Registered Provider	3	11%
Council Officer	3	11%
Strategic Housing Partnership	1	4%
Other	2	7%
Not stated	4	15%

There was also a written response from the British Legion.

On the basis of these responses there is strong support for the Policy's vision and objectives. The consultation questions and the responses to them are outlined below. The percentages below relate to 24 online responses. The written response provided comments on specific points.

Do the aims of the Policy capture the main priorities?

83% of respondents feel that the aims capture the main priorities.

The move away from cumulative preference to band and waiting time is viewed as a simpler method of prioritising housing applicants.

Do you think that the Policy will lead to a more efficient use of social housing in Trafford?

87.5% of those responding think that the Policy will see efficiencies

Do you agree with the proposed Bandings?

This question received 18 positive responses (75%).

One respondent wants to see a category for people moving into the area to take up employment. The introduction of band 4 for positive community contribution which allows those applicants who don't have reasonable preference criteria some priority when applying for accommodation is welcomed. It is believed that this will assist in balancing and sustaining communities, and assist applicants wanting to move for employment and training.

Do you agree that the number of Bands be reduced from 6 to 5?

79% of respondents feel that the number of bands should be reduced.

A concern is that reducing the band size means that those in most need may end up competing with more people. A category should be included for those people moving into Trafford to take up employment.

Do you agree that additional priority should be given to social housing tenants who are under-occupying and wish to move to a smaller property?

83% agree with this additional priority, given that there aren't enough larger properties available to those who need them. It is felt that this would work if it meant that more housing was made available. One way of making this happen will be through property swaps.

Do you agree that social housing tenants under-occupying by 2 or more bedrooms should have higher priority than those under-occupying by 1 bedroom?

71% also feel that this change should take place. The inclusion in Band 1 of applicants who are under-occupying their current property by 2 bedrooms or more will reflect the changes to housing benefit brought about by the Welfare Reform Act of 2013.

Do you agree that additional priority should be given to households who are over-crowded and wish to move to a larger property?

83% agree with this change. No comments have been received.

Do you agree that additional priority should be given to former Armed Forces personnel, spouses, partners, and civil partners?

75% of those responding agree with this change. One view is that priority should be given to those who most need it, and this may be anyone. Is it possible to link categories, such as former armed forces personnel who may fall into other categories or into a category for people moving into the area to take up employment? One person suggests that fire fighters and members of the Police should have more priority than Armed Forces personnel.

However particular welcome is placed on the emphasis on ex-Armed Forces personnel and recognition of the specific circumstances they face in accessing social housing, in line with the Armed Forces covenant. The covenant makes this change a mandatory requirement of the Council. The British Legion suggested changes around: local connection being extended to include bereaved families and reservists, additional preference to include those having had dishonourable discharge, widening of the eligibility to reflect the increased role of Reservists, and income levels, with

lump sums exempted from calculations (especially around personal financial resources).

Do you agree that applicants leaving supported accommodation should get additional priority?

71% of those responding think that additional priority should be awarded to this group. One person feels that this group don't receive enough care and support so this change would help them.

Do you agree that foster carers and adopters should be given additional priority?

62.5% agree with this proposed change. For one respondent this group should be classed as over-occupying.

Should the Policy contribute to the Council's objective of a strong local economy and active community by giving additional priority to those in work or who make a positive contribution to their community (Trafford Positive Community Criteria?)

83% of respondents feel that a positive contribution to the community should be rewarded.

The introduction of band 4 for 'positive community contribution' which allows those applicants who don't have reasonable preference criteria some priority when applying for accommodation is welcomed. It is felt that that this will assist in balancing and sustaining communities, and will assist applicants to move for employment and training.

However, people who work and have children do not always have the time to help the community. How will this be assessed?

There is a perception that presently the policy actively discriminates against people in full time employment, and that it is easier for those out of work to be given a higher band. One respondent says that greater emphasis / priority should be given to working households, and that this is particularly important for low income households needing access to affordable housing, especially in a high cost area like Trafford. Another suggestion is that additional bands should be considered in order to differentiate between working and non-working households. This would help to achieve a better overall mix and a better deal for low income households.

Do you agree that 20% of properties advertised to Band 4 applicants should only be available to households in work or seeking work (including voluntary work)?

71% feel that this is a positive change. One respondent states: 'With reservation. Consideration should be given to people wanting to work or volunteer who may only reasonably do so after moving to a new home. Reading the document it was not clear about any preference given to those SEEKING work.'

2 respondents think that the percentage should be more than 20%, as this will produce more considerate tenants less likely to cause nuisance and anti-social behaviour. 1 respondent thinks it should be less than 20%.

Do you agree that households with the financial resources to find their own housing solutions in the private sector should be given less priority?

62.5% agree with this change.

Respondents feel that it is difficult to estimate what amounts to sufficient "financial resources".

However, there should be a threshold, and if people are earning enough to be able to afford to buy or rent in the private sector then they should have less priority. 1 respondent states that private rental is not a reasonable option. Additionally, some people might have a bad credit rating or debts, which they are struggling to pay off and private renting won't help solve this problem.

The issue of high property prices and the amount of deposit required was raised. Working people, on a good salary, 'in this day and age are unable to save up for a deposit, so realistically are no better off than people on benefits.'

Many households do not necessarily have the resources to pay rent whilst also saving up for a deposit.

One respondent feels that this change is not before time. Some tenants appear to be evicted time after time because of anti-social behaviour, for example, only for them to be re-housed and causing the same problems another local community. Those who can afford to buy or rent privately should not be given a high priority. One person asks if we are proposing to give those who are working, and therefore financially better off than those who are unemployed, a higher priority. They ask how this can be justified. Also, any profits made as a result of discounts through right to buy should be re-paid, or taken into account in individual cases which should lead to people being refused housing, except in exceptional circumstances.

1 person feels that a higher priority should be given to single parents earning a low wage.

Do you agree that either of the following financial resources should be taken into consideration when giving less priority to an applicant: Household income of £50,000 per annum; Household assets or equity of 40% and / or savings of £16,000

54% feel that household income of £50,000 per annum should mean that a household receives less priority, with 25% stating that assets or equity of 40% and / or savings of £16,000 should be taken into account. One person says: 'If you can earn £50,000 then you are more than able to source your own housing.'

However, 1 respondent places a caveat on this by saying '...household income of £50,000 should mean they can get a good mortgage - but depends on other debts etc. if they own a property or have assets over £40,000 then this should all be taken into account.'

Whether the amounts should be higher or lower, one person said: 'I do not think that they should be higher, although, like any figures which can be affected by inflation and changing markets, they should be kept under review.'

One respondent stated that the amount of household income should be lower: 'Those with income of £40,000 or even lower than this, should not be able to remain in their rented homes, and should certainly be given a low priority rating as they can afford to buy their own properties or rent privately or (access) shared ownership.'

Do you agree that less priority should be given to households guilty of having committed serious unacceptable behaviour?

87.5% agree with this proposed change. One respondent asks why should people be rewarded for bad behaviour? Those that do cause nuisance should not get a high priority, whatever their circumstances.

Some caution is recommended though, as 'children, or less culpable members of the household, may suffer as a result of the anti-social behaviour of a member of the household.' Additionally, 'people with mental illness and other medical problems cannot help the way they behave and so consideration must be made for this type of household.' For example, 'the family with ... a child with ADHD should not be penalised for this.'

Do you have any further comments on our proposed priority groups?

One respondent is concerned that allocations of properties to people with substance misuse issues and who are likely to cause problems for their neighbours. They should be first required to undergo a probationary period. This will ensure that the situation does not result in homeless people congregating and living there, which may cause anti-social behaviour.

1 respondent would like to see an option to review cases that fall outside the criteria. An applicant who "has special circumstances that give rise to a local connection" may allow for this.

1 respondent suggests that as ex- Armed Forces personnel appear in each of the banding criteria; it may prove useful as an additional note to state that Armed Forces are considered within the criteria in each band without consideration of local connection. Whilst this is stated for Band 1, it is less clear in the other Bands and may be interpreted as all ex-Armed Forces go into Band 1.

Another query concerns under-occupation. Will Band 1 priority be given to applicants under-occupying by 2 bedrooms but whom, when bidding, bid for a property where they are still under-occupying, but by 1 bedroom, or will Band 1 only be given to those applicants who are bidding for a property where there is no under-occupation. This point will be clarified in the final version of the Policy.

Another concern expressed relates to medical assessments. 1 person states that: 'There should be more specialised people examining medical aspects of a case. It appears that there is no assessment of Autism, which is a serious hidden disability that appears to not be understood by Trafford Housing Trust of the board of HOST.'

Do you agree that the Council, when appropriate, should discharge its housing or homelessness duty with an offer of a tenancy with a social landlord or an approved private landlord?

75% of respondents state that this change should take place. 1 says that a 'home is a home. It doesn't matter who with.'

Do you agree that applicants awarded Exceptional Circumstances and Homelessness Priority should have to choose a minimum of 3 areas for a limited period of 8 weeks, after which time regardless of whether suitable properties have become available in those areas, the Council is then entitled to make a direct offer in either the social or private rented sectors, anywhere in Trafford?

62.5% also agree with this proposed change. 1 respondent says that housing applicants may 'have friends or links to certain areas and it is cruel to treat people similar to the workhouse mentality, where people were sent miles away, without thought or a little kindness. Never should we return to those old values...'

Do you think there is a potential adverse or positive impact of the Policy on these different Equality target groups?

Respondents feel that the Policy will affect peoples' housing applications based on their sexual orientation (8%), gender (8%), age (21%), disability (25%), race (4%), and religious / faith groups (4%).

It is suggested that mental health problems may not be fully accounted for, especially if social isolation is a factor.

Another respondent says that there could be a detrimental affect for households with disabilities, 'as they may have to accept a property that is not suitable for their needs.' There may also be a cost issue here, as there will be a need to adapt the property which is offered.

One respondent says: 'I would also like to add that people in work who end up homeless are not really catered for by this policy.'

Do you have any further general comments on the Policy?

A number of other comments were received in conclusion:

I am glad to see that under occupancy is being taken into account, not before time.

There does not appear to be an option to consider medical / health grounds for someone living outside of Trafford.

I think the policy is fantastic, due to my own circumstances, and struggled with the banding policy, as I didn't 'fall' into any particular bracket, this policy is a LOT clearer and will no doubt assist people and your staff in the banding process.

Bullet point under-occupancy perhaps should read under-occupancy by 1 bedroom as it says this in the explanation at 6.51.

Would there be clear communication between HOST and housing providers as to the properties that will be advertised as "require working households only" as part of

20% nominated properties?

Who would be the “decision makers “on the properties to be identified and who would monitor that 20% of nominated properties are going to working households”

Any delays could result in increased void times and therefore an adverse impact on performance.

Consultation Events

A Trafford Youth Cabinet meeting with 16 young people discussed the proposed changes, with the majority in favour, with one person thinking that the Policy will result in quicker allocations being made.

Trafford Housing Trust held consultation events with 33 staff and customers who attended 2 half-day workshops and a workshop with young people from the Trust’s Youth Board. Overall those attending were happy with the proposed Policy. Attendees felt the aims of the policy to be comprehensive.