

Appendix 2



**Executive
27 May 14**

Draft Housing Allocations Policy

Response to Formal Consultation

1. INTRODUCTION

- 1.1 The Localism Act 2011, introduced changes in housing law giving councils more freedom to determine who can apply for council and Housing Association housing and how their applications will be treated.
- 1.2 As a result of this, Central Bedfordshire Council (CBC) proposed a number of changes to the current Housing Allocations Policy. The Policy governs who can apply to the housing register, the size of the property which a person can apply for, and the priority of housing applications.
- 1.3 CBC formally consulted on its draft Housing Allocations Policy for 12 weeks from 4th November 2013 to 31st January 2014.
- 1.4 Each of Central Bedfordshire's housing 1500+ applicants on bands C and D (medium need and low/no need), who may be impacted by a change in Allocations Policy, were written to individually to provide notice of the formal consultation and to provide information about they could respond to the consultation.
- 1.5 The formal consultation was managed via a formal consultation document. This was available in paper format; downloadable from the CBC website, or was obtainable by telephoning or writing to the contact details provided in the letters to housing applicants.
- 1.6 CBC staff and elected members were informed about the formal consultation, social media was utilised and press releases were issued to the media to raise awareness of the consultation with Central Bedfordshire residents.
- 1.7 As part of the consultation process for the proposed Housing Allocations Policy the Interim Lead Officer for Housing Needs, representatives from the Housing Register Team and the Senior Estates Officer discussed the proposed Allocations Policy and provided additional qualitative feedback.

2. RESULTS OF CONSULTATION: DEMOGRAPHIC PROFILE

- 2.1 In total, 103 people responded to the draft Housing Allocations Policy formal consultation.
- 2.2 25% of respondents were housing register applicants, 16% were council or Housing Association tenants, 6% were from Town or Parish Councils, 10% were professionals, 16% were recorded as "other" and 17% did not include this information.
- 2.3 29% of respondents were male, 67% were female and 4 % preferred not to say.

- 2.4 45% of respondents were aged 55 years or over.
- 2.5 19% of respondents stated that they had a disability.
- 2.6 78% of respondents stated that they were heterosexual.
- 2.7 77% of respondents were White: British and 13% of respondents preferred not to state their ethnicity.
- 2.8 51% of respondents' stated their religion or belief was Christian and 30% of respondents stated they had no religion or belief.
- 2.9 Appendix 1 provides a full demographic statistical profile of respondents.

3. RESULTS OF CONSULTATION: QUESTION RESPONSES

The formal consultation was designed to capture both quantitative and qualitative data from respondents, with results summarised as follows:

3.1 Q1. Do you agree that people with no housing need should be stopped from joining the housing register?

Yes	58	57%
No	40	39%
Don't Know	4	4%

58 respondents (57% of respondents) agreed with this proposal. 28 respondents, (27% of respondents) who did not support or did not know if they supported the proposal provided qualitative feedback; issues over housing affordability were raised and that not all circumstances appear to be considered in the policy as it does not allow for any imminent/foreseen changes in circumstances.

3.2 The council wants to ensure that social housing is let to people with a 'local connection' in Central Bedfordshire. It is proposing to allow people to go on the register only if they have lived continuously in Central Bedfordshire for three years.

Q2. Do you agree with this proposal?

Yes	68	67%
No	31	30%
Don't Know	3	3%

68 respondents (67%) agreed with the proposal. 28 respondents (27% of respondents), provided qualitative feedback. Respondents supporting the proposal stated that people who work within Central Bedfordshire should be able to be housed in the area, respondents who did not or did

not know if they supported the proposal indicated that 3 years was too long and that peoples individual circumstances should be considered before imposing timescales. Individual circumstances included being closer to an elderly relative or fleeing domestic violence.

Q2a. If yes, do you think that 3 years is about the right length of time?

Yes	41	60%
No	24	35%
Don't Know	3	4%

41 respondents (60%) of the 68 respondents that supported the proposed 'local connection' component agreed that 3 years was the right amount of time.

**Q2b. If no, how long do you think someone should have lived in Central Bedfordshire before they are allowed to join the housing register as a local resident?
(Please tick one box that applies).**

1 year	2	8%
2 years	4	17%
4 years	2	8%
5 years	12	50%
10 years	4	17%
Other	0	0%

Half of the 24 respondents who did not agree that there should be a local connection for 3 years, believed that 5 years was a more appropriate length of time.

3.3 Under the new Allocations Policy, people who do not live in Central Bedfordshire can be treated as having a local connection if they have been employed in Central Bedfordshire for 6 months. This is in order to encourage employers and workers into the area.

Q3. Do you agree with this idea?

Yes	68	67%
No	28	27%
Don't Know	6	6%

68 respondents, (67% of respondents, supported this proposal; 2 of these respondents, (3%), provided qualitative feedback stating that this will ensure continuity of employment.

25 respondents, (25% of respondents), provided qualitative feedback consisting of mixed opinions over the 6 month period being either too long or too short a time period. There was some support for those in employment renting from the private rented sector.

3.4 The new Allocations Policy proposes not to allow people to apply to the housing register if they have enough income to buy their own home or rent a home privately. It is proposed that different (before tax) income thresholds should apply for different property size needs as follows:-

- **Needing a 1 bed property - £30,000pa household income threshold**
- **Needing a 2 bed property - £40,000pa household income threshold**
- **Needing a 3 bed property - £50,000pa household income threshold**

Q4. Do you agree with this idea?

Yes	71	70%
No	26	25%
Don't Know	5	5%

71 respondents, (70%) supported this proposal.

Q4a. If yes, do you consider the suggested income thresholds to be fair?

Yes	53	75%
No	8	11%
Don't Know	10	14%

53 respondents (75%), supported the threshold proposals as fair.
No respondents provided qualitative feedback for this question.

Q4b. If you answered no to question 4, please give a reason for your view, if you wish.

24 respondents (24% of respondents) provided qualitative feedback.
These respondents indicated that thresholds are too high and questioned affordability.

3.5 As proposed, the new Allocations Policy will prevent people being placed on the housing register if they have savings or assets of £23,250 or more.

Q5. Do you agree with this proposal?

Yes	60	59%
No	32	31%
Don't Know	10	10%

60 respondents (59% of respondents) agreed with this proposal; 1 person referring to this being the same level as assessed for older people entering residential care.
 31 respondents, (30% of respondents), provided qualitative feedback. These respondents indicated that £23,250 is too low based on current costs of living.

- 3.6 The Council is proposing a much simpler system for banding applicants for housing. At present, applications are assessed in detail to see how urgent their housing need is and placed into one of four bands - URGENT NEED, HIGH NEED, MEDIUM NEED and LOW / NO NEED. People can move up and down within their band depending on their level of need in relation to other applicants. This makes it difficult for people to understand what is happening with their application.**
Under the proposed new system, there are two bands; one for very urgent housing need cases, and one for all other applicants. People will wait for housing, in the bands, in date order.

Q6. Do you agree with this idea?

Yes	62	61%
No	28	27%
Don't Know	12	12%

62 respondents, (61% of respondents), indicated that they agree with this proposal.
 35 respondents, (34% of respondents), provided qualitative feedback; indicating that respondents who do not support this proposal experience the current system as working well and believe that the new system may be too restrictive.

Qualitative feedback from staff supports the change in categories however raises concerns that non urgent housing needs could be a large group with varying need levels.

- 3.7 The council proposes the introduction of an 'employment priority' into its allocations, so that working households are prioritised for properties over non-working households.**
Employed people will need to prove that they are employed for at least 16 hours per week, with a contract of employment.
Volunteering and apprenticeships will count as employment provided these are similarly formalised arrangements.
As a high proportion of households on the current housing waiting list are non-working, this will not mean that non-working households cannot get a property, but they may wait longer than a working household.

Q7. Do you agree with this proposal?

Yes	67	66%
No	27	26%
Don't Know	8	8%

67 respondents (66% of respondents) support this proposal, 2 of which (3%) provided qualitative feedback that working households should be recognised.

24 respondents, (23% of respondents), provided qualitative feedback that did not support this proposal and raised issues regarding the current economic climate and that the impact of disability could affect how they will be assessed under the proposed policy.

Qualitative feedback from staff consultation included concerns of how assessments will be made with regard to people regaining employment and suggesting the inclusion of those people actively seeking employment.

- 3.8 We propose to exclude people who are bad tenants from the housing register. This includes people who have a poor tenancy history, those who owe rent from a previous tenancy, and people who have been violent, abusive or threatening. The Council will ensure that those households who are excluded will be given support to change their behaviour so that their application may be reconsidered in the future.**

Q8. Do you agree with this proposal?

Yes	82	80%
No	11	11%
Don't Know	9	9%

82 respondents (80% of respondents) agree with this proposal.

Qualitative feedback stated that supporting people to change behaviour will benefit the community.

9 respondents, (8% of respondents), did not support the proposal.

Qualitative feedback raised concerns about; where excluded people will go; the impact on any younger household members and that assessments should be made on a case by case basis.

- 3.9 Low paid workers who rent their homes from a private landlord are not treated as being in housing need in the current Allocations policy. The new Allocations Policy proposes to give people in this situation a better chance of getting a Council or Housing Association home.**

Q9. Do you agree with this proposal?

Yes	87	85%
No	12	12%
Don't Know	3	3%

87 respondents, (85% of respondents), agree with this proposal. 3 of these respondents, (3%), provided qualitative feedback stating that private tenancies are not always secure and that assessments should be based on the housing person's needs.

10 respondents, (10% of respondents), provided qualitative feedback indicating they did not support or did not know whether they supported this proposal; raising questions about whether people who had secured private rented accommodation were in housing need.

Qualitative feedback from staff contained mixed views with regard to this proposal. Support was given to the proposal due to the higher rates of rents within the private sector,, counterbalanced by issues with regard to the need to rehouse tenants that are already in adequate accommodation.

3.10 The Allocations Scheme proposes that applicants seeking older persons' accommodation have to demonstrate 'housing need' before accessing the housing register. We are aware that some older persons' accommodation, particularly some sheltered schemes and 1-bedroom bungalows attract no bids. Not being able to easily let these properties in the future is not a good use of our housing stock.

Q10. Do you agree that older people who do not demonstrate 'housing need' should be able to bid for vacant older peoples' accommodation, where these properties attract no interest / bids?

Yes	12	12%
No	1	1%
Don't Know	2	2%

12 respondents, (12%) agreed with this proposal, with 85% of consultation respondents not answering this question.

2 respondents, (2%), provided qualitative feedback and did not support or did not know whether they supported this proposal; including a raised concern that there should be a housing support need.

3.11 Q11. Please give any additional comments you would like to make on the proposed changes to the Allocations Policy.

50 respondents, (49% of respondents), provided additional qualitative feedback.

There was support for the draft policy as travelling in the right direction with regard to local connections, promotion of employment and inclusion of low income tenants currently in private housing.

Issues were focused on the policy not fully considering the needs of disabled people with regard to allocation of bungalows originally intended for older people.

Concerns were raised that people may not be able to continue to live somewhere that they have lived for most of their life due to not meeting the new criteria, therefore impacting on their social needs.

3.12 A full account of the formal consultation qualitative feedback is presented in appendix 2.

4. SUMMARY

4.1 In summary, the majority of the 102 respondents were in support of each of the 10 proposals put forward in the formal consultation; however question 10 recorded far fewer responses, 85% less, than others within the survey.

Whilst there was support for the proposals as being fair and welcome, the consultation raised a number of wider issues; that the current banding and assessment and banding system is fair and satisfactory, a new system may make the housing process more complicated as the current economic climate and unemployment levels may impact on the need for social housing and proposed changes to the Allocation Policy.

Appendix 1:
Results of Consultation: Demographic Profile of Respondents

12. Please tell us which type of respondent you are:

	No.	Percentage
Housing Register applicant	26	25.5%
Council or Housing Association tenant	16	15.7%
Professional	10	9.8%
Town/Parish Council	6	5.8%
Other	16	15.7%
Not recorded	28	27.4%

13. Please tell us your gender

Male	30	29.4%
Female	68	66.6%
Transgender	0	0.0%
Prefer not to say	4	3.9%

14. Please tell us your age

18-24 years	2	1.9%
25-34 years	12	11.8%
35-44 years	19	18.6%
45-54 years	23	22.5%
55-64 years	22	21.6%
65-74 years	12	11.8%
75+	3	2.9%
Prefer not to say	9	8.8%

15. Do you consider yourself to be disabled?

Under the Equality Act 2010 a person is considered to have a disability if he/she has a physical or mental impairment which has a sustained and long-term adverse effect on his/her ability to carry out normal day to day activities.

Yes	19	18.6%
No	74	72.5%
Prefer not to say	8	7.8%
Not recorded	1	0.9%

16. Please tell us your sexual orientation

Heterosexual	80	78.4%
Bisexual	1	0.9%
Gay	2	1.9%
Lesbian	1	0.9%
Prefer not to say	15	14.7%
Not recorded	3	2.9%

17. Please tell us your ethnicity

White: British	79	77.4%
White: Irish	3	2.9%
White: Gypsy or traveller	1	0.9%
White: other	3	2.9%
Mixed: White and Black Caribbean	0	0.0%
Mixed: White and Black African	0	0.0%
Mixed: White and Asian	0	0.0%
Mixed: other	0	0.0%
Asian or Asian British: Indian	0	0.0%
Asian or Asian British: Pakistani	0	0.0%
Asian or Asian British: Bangladeshi	1	0.9%
Asian or Asian British: Chinese	0	0.0%
Asian or Asian British: other	0	0.0%
Black or Black British: Caribbean	0	0.0%
Black or Black British: African	0	0.0%
Black or Black British: other	0	0.0%
Other	2	1.9%
Prefer not to say	13	12.7%

18. Please tell us whether you have a religion or belief

No religion	31	29.4%
Christian	52	50.9%
Buddhist	0	0.0%
Hindu	0	0.0%
Jewish	0	0.0%
Muslim	1	0.9%
Sikh	0	0.0%
Other	1	0.9%
Prefer not to say	16	15.7%
Not recorded	1	0.9%

Appendix 2: Results of Consultation: Qualitative Feedback

Q1. Do you agree that people with no housing need should be stopped from joining the housing register?

- I would differentiate between "need" and "deserve" People who may not meet the legal definition of "need" may still be in difficult circumstances which would be alleviated by rehousing, and may be more deserving in having lived in and contributed to the community for a long time.
- The very fact that currently those with 'no' housing need are able to secure tenancies indicates that these properties would lie dormant and unused for an indeterminate time. The fact that these properties may subsequently be separately advertised is a decent compromise on this but it would be hoped that those seeking housing advice with 'no' housing need are made very aware of this and to keep looking at these properties too.
- If a tenant is living in a 3 bedroom house but would like to re-establish their household in another area of the district for personal reasons I cannot see the justification for not letting them do this through the housing register. Subject to doing an affordability check, I would argue that they are in 'housing need' by definition of being in one of our properties; they are unable to afford a property in the private sector so cannot move. In many cases tenants wish to move to improve their situations, i.e. being nearer a family member that can provide childcare so that they can work or access a school that will suit the child of the family and thus improve their life chances. Forcing someone to stay in an area that they do not want to seems unjustified and likely to negatively affect their social wellbeing and therefore employability etc. Mutual exchanges are not always available for the exact places that all parties would like and it will be frustrating to have vacant properties come up in an area that a tenant would like to move to but they will not be allowed to bid for. We should be to reward tenants by letting them have the opportunity to move should they wish to. A tenant 'stuck' in a property and area they do not like is less likely to make a positive investment in either.
- Applicants in privately rented accommodation do not have security of tenure
- It is social housing and should be open to everybody
- I don't feel I know enough about it.
- I feel that each individual's situations should be taken into account. For example if a person owns the property jointly and the relationship collapses they may need to move so as not to develop financial problems

- I feel this is discrimination
- People could be in accommodation they can't afford.
- Even people in gainful employment struggle to find the money for the extortionate rents being charged in this region. The situation will worsen after January 1st when no doubt, thousands arrive from abroad. I know families that struggle to pay bills and buy food, in an effort to keep a roof over their heads!
- As people in those bands have very little chance of getting a home anyway are you just getting rid of "extra work".
- It may be that their circumstances are changing or due to change so are being both sensible and practical in advance. Our situation is that we are both adequately housed in two separate counties but policy and councils do NOT cooperate with each other in arranging suitable property, instead we have the equivalent of four bedrooms in two properties but only require a two bedroom property.
- I fled a violent partner and rent I have to pay a high rent and the house is not in great condition. I cannot get my ex out of the house and would have it repossessed if I lived there. If I gave up my job claimed benefit and went into a refuge I would be in a higher band. But I work and cannot get legal aid (I earn eleven pounds over) I cannot force him to sell the house. There is no equity in it anyway. I live in poverty due to my rent and have worked hard to provide a home for my kids and get no help and can not afford to heat the house or put on the immersion heater. We are poor and if I gave up my job claimed benefit and went into a refuge I would be considered. I am surely providing a good example to my children but do not qualify for consideration but I took my children away for their protection and mine.
- Why should outsiders get priority over LOCAL people
- Not a good idea if it stops younger adults getting on the register to move out of parental homes, otherwise ok
- I am single on a low income, and I get help with my rent which I am really grateful for. I am 55 years of age and renting privately. It scares me that if my landlady decides to sell her property I could be made homeless as I can not afford to rent at a higher PRICE.
- The reason we don't agree with it is because me and my partner have lived in Luton all our lives and we have to move from one place to another, we are 52 yrs of age we don't have any money to buy and private renting is not permanent so we always have this worry of some where to live...we both suffer bad with arthritis and it will get worse as

we grow older, we think it all depends on how long you have lived in this country and of course if you cant afford to buy...

- If people need to move boroughs to be closer to family they should be allowed to bid
- People who live in villages cannot afford to buy a property there or rent privately. So they have no choice but to leave their family and the village they grew up in. This is not fair. If there are council owned properties in a village then people from that village should be given priority above anyone else even if it is a 2 or 3 bedroom property and they are a single person they should be given priority over anyone from outside that village.
- The system at the minute is not that easy to work with and does not allow you to move if you only have slight need changes .This to me does make people get stuck in a rut and does hinder the customer and you weather that is through you getting rent or tax payments or the customer being more able to earn that money. For example my lifestyle requires the same size property but with direct garden space to make my life slightly simpler .I find social housing some times a good thing as it is a good first step for people with needs if they have had social issues .At the same time they can very quickly be abused by this same social system if you are working on something else and you do not fit the social trend at the time. I also think that there could be more direct communication on moving issues to make things flow better or to get the next person on the chain to get your first level of help.
- They are most likely struggling to pay private rent, have debts & child support agency to contend with or are in negative equity
- They should remain on the register because there situation could change at any time.
- It depends on the reason why they are classified as having low priority - for instance a young mother with 2 boys under the age of ten living in a first floor maisonette in Morcom Road, Dunstable. She would like a 2 bedroom house with a garden for her children but she will be classified as being adequately housed with low need. If she is working and able to pay the difference with the bedroom tax, then she should be considered for a three bedroomed house in addition to a two.
- Your definition of "Housing Needs" is very narrow. Many young people & people on a low income would struggle to raise the money for a deposit on a house, or to pay rent from a private landlord. What are they supposed to do?
- People who know that they will have a housing need in the near future (say, within 12 months) should be able to register an interest

- No I think everyone should have a chance to be able to say if they wish to stay on the housing register
- Some peoples 'housing' circumstances can change drastically so social housing can be their only hope
- Medical Grounds

There are a range of views here, with 57% of responders in support of this proposal. The Council proposes to introduce an online housing options calculator as part of the implementation of the new Allocations Policy. Where applicants are not eligible for the housing register, they will be steered towards a range of other housing options. One of these will be the ability to register for the Available Now Window. This is a window on the HomeFinder website where properties that are lower demand and have not received any bids from applicants in housing need will be made available. Clients who are assessed as not in housing need will be able to put themselves forward for these vacancies. We also plan to publicise this Available Now Window locally, with a range of employers, to give housing opportunities to other local people.

We are aware that applicants living in private rented accommodation lack security of tenure, but if we were to register applicants simply on that basis then there will be many thousands on the housing register. It is better to register them because they have another need as well as security of tenure. Additionally the draft policy makes provision for those who are struggling financially.

There will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases.

The definition of housing need used is one set down in law. We think this is a good place to start. The waiting time for accommodation in Central Bedfordshire isn't too long – less than a year on average, for those people likely to be rehoused. Those who think they have a future need can register as soon as that need arises and can still be rehoused quite quickly.

Q2. The council wants to ensure that social housing is let to people with a 'local connection' in Central Bedfordshire. It is proposing to allow people to go on the register only if they have lived continuously in Central Bedfordshire for three years.

Do you agree with this proposal?

- People who work in the area should also be allowed to go on the register
- If someone from outside the area obtains a permanent job in the area, and meets other criteria, they should be considered for housing
- Some people are in danger in other areas. You'd be excluding people
- People may need to relocate for work/ job prospects/ families etc.
- 3 years is far too long for people in housing need to wait
- This is telling people where they can and cannot live. I don't think this right.
- I agree in principle with local housing being for local people, but there needs to be consideration of various people and exceptions made for them. People fleeing domestic violence, coming from care and a wide variety of other reasons may require housing in a different area to where they have a local connection. It is very imaginable that someone may not have a local connection with any place if the requirement is they need to have lived somewhere for the last 3 years. This is very difficult for Local Authorities to work with because each policy is local, but actually that is not the person in need's fault and exception needs to be made in that case. Something along the lines of a person showing they could not get local connection status with any area they have recently lived in and therefore should be allowed to have local connection or allowed to be on the housing register in the area they have most recently lived in (unless they are fleeing that area for some reason) should be included. With this proposal we risk excluding those who have led a transient life, either through choice or not, which is fundamentally wrong. Where else can they go if no-one will take them?
- The criteria are too strict. Local connection should also include working in Central Bedfordshire or having immediate relatives living here currently (as per current policy)
- Should be same as Hertfordshire which is 5 years local connection
- People should have a choice where they live. E.g. to be near family or to seek work
- In exceptional circumstances, some applicants may be fleeing Domestic or other forms of violence. These cases may be applying from areas outside of Central Bedfordshire.
- Because it makes it more difficult to move to the area if they find a job.

- Because of people moving to the area for work or for family reasons and three years is too long
- If you have to move to an area for employment, you would need housing, also if an elderly parent needs support they might need to move closer to family
- People often need to move to a different area to find work and they will require housing and schools etc. in that area.
- Central Bedfordshire is a small geographical area and as far as I know is part of the eastern region and United Kingdom I see no legitimate reason for a person living in say Cambridgeshire not applying for a CBC property. You cannot claim to be supporting people to get jobs on the one hand and then restricting their ability to move to get a job on the other.
- In exceptional circumstances, some applicants may be fleeing Domestic or other forms of violence. These cases may be applying from areas outside of Central Bedfordshire.
- Anyone should be able to move around their own country for a number of reasons. I find your proposal a bit offensive.
- People in the forces may wish to return to their home county but have no longer any family
- I think people should be allowed to be considered for any area as you may want to move to be closer to an elderly relative. I wanted to be closer to my father in Keston but Pilgrims took me off their list. He now has a carer paid for by the state when I could have popped round and checked on him daily if I was housed in that area or people might want to cross the border for work connections
- There may be examples of families where parents have separated (through domestic abuse, drug & alcohol addiction of one partner etc.) who have close extended family in CB which would give the much needed support network a single parent may need to prevent them from slipping into targeted children's services.
- Again if an elderly person has family living in area and they need to move to be closer to family
- If you're in an area then I feel you should be able to register.
- As I am on the Central Beds transfer list myself and have been for some time. I think if you have been on the list for a certain amount of time you should have as much rights as anyone else. I live in Luton but

Central Beds allocate properties in the Dunstable and Houghton Regis area which is just up the road from where I live.

- The question being asked is different in meaning to the definition in the proposals document. The wording in Question 2 should be kept, but with the addition of 'for any period within their lifetime' rather than 'for three years'.
- They should be allowed if they were born in Bedfordshire, not just Central Beds....
- For people who have relocated for various reasons and have no other way of being rehoused
- it should depend on somebodies circumstances e.g. a person maybe transferred in his work or found work in an area not where he was born e.g. I am a Londoner but found housing and work 34 years ago in Bedfordshire.

Responses from the consultation were mixed in their support for this recommendation, with the majority (67%) in support of the proposal. The policy defines local connection as having lived in CBC for 3 years, or having worked in CBC for 6 months, and as such the policy seeks to support wider corporate priorities in terms of the growth of the economy and sustaining employment. The policy defines local connection as living within CBC as the policy applies to the area within the Council's boundaries. Neighbouring boroughs are not included.

Members of the Armed Forces and Former Service Personnel are considered to have a local connection providing their application for housing is made within five years of their discharge. Bereaved spouses and civil partners of members of the Armed Forces will also qualify for a local connection, as too will serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result

These provisions recognise the special position of members of the Armed Forces (and their families) whose employment requires them to be mobile and who are likely therefore to be particularly disadvantaged by local connection requirements; as well as those injured reservists who may need to move to another local authority district to access treatment, care or support.

Some respondents felt that three years was too long a period, whilst others felt that five years was a more appropriate time period in which to establish a local connection. The Code of Guidance recommends that two years residency should be the minimum time frame in which to establish a connection. On balance it is felt that three years is an appropriate time.

For people wishing to move to Central Bedfordshire with no local connection, advice and assistance will be available in how to access other forms of accommodation, including private rented accommodation. Homeswap is available to assist social housing tenants wishing to relocate.

Concern was expressed that this approach would exclude households fleeing domestic abuse or other forms or harassment of violence. There are clear safeguards in law to protect those at risk of violence, including the provisions within the homeless legislation. Moreover there will be provision within the policy for dealing with exceptional circumstances.

Views were also expressed in relation to the policy failing to take account of those needing to move to the area to either give or receive support. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases.

Q3. Under the new Allocations Policy, people who do not live in Central Bedfordshire can be treated as having a local connection if they have been employed in Central Bedfordshire for 6 months. This is in order to encourage employers and workers into the area.

Do you agree with this idea?

- No - if people are in employment then they should rent from the private sector.
- I don't think 6 months is long enough. Some people would just do it to get housed.
- Should be at least 1 year
- People might take up short term employment just to get onto the list, and then drop out of work. Suggest they should work for at least 18 months.
- Employment can change so frequently, 12 months is a better suited time period
- 6 months is too long to wait for someone who gains employment in the area. They may be unable to take up a job offer if they have to wait 6 months before being able to make a housing application, bearing in mind they will not know how long they will need to wait before receiving an offer of tenancy.

- As long as the employment is permanent. I am unsure whether I agree with this morally, if applicants are working and able to help themselves they have more options than applicants that are not working. However, I do think that all applicants should be encouraged to try and help themselves in whatever way, to resolve their own housing need but we should not penalise them for trying and not achieving work.
- 6 months is too long- where are they supposed to live if they've just got a job in the area? If people are unemployed they presumably don't have an income, so how are they supposed to find somewhere to live?
- It would mean a family would have to be separated and run two homes for at least 6 months. I work in the supported housing sector, and am concerned that if employed people get priority for properties with an over 50 criteria, where we supply support, our service will be greatly diminished, these properties should be held for people with a support need. I assume the priority for employed people does not include over 60 for sheltered housing?
- I think it should be slightly longer, maybe 8 months.
- If people have to work for 6 months in the area before being eligible to live here then where?
- I think it should be 12 months not a 6 months employment period. I do not agree with "those who owe rent from a previous tenancy" because the private renting is extremely high and can cause the rent arrears
- How on earth are workers to afford to travel or keep two places to live? They should be able to move asap.
- I could not get a local job and work in Cambridge.
- This will reduce the housing stock available for CB families. Persons moving for work must make an economic assessment as to whether the move is financially beneficial for themselves and their family in the same way that everyone else will do.
- I do not believe that people who choose to live in the area purely for work should be allowed to go onto the register unless there is a clear reason (i.e. perhaps specific skills required in the area could be given dispensation - e.g. shortage of nurses or rare skill where there is a desperate need in the area). If someone chooses to move into the area to work, that is their choice. It is far different from someone who grows up in the area and is unable to leave home due to affordability.
- Because they can drive to work or get transport via train and bus
- Should be at least 5 years working there.

- There needs to be very local employers for this to happen. People are some times within this system regardless of there working lifestyle a move or home does or could enable change to earn
- 6 months is a very short time, as many employment contracts are for short term periods. The period should be a minimum of 1 year's work. Also their current place of residence should be taken into account so that if they live within a 'reasonable' commuting distance (say 30 miles/40 minutes travel) of their employment then their priority on the housing register should be lessened.
- 6 months is too short, it should be a minimum of two and a half years.
- I think that this is considered to be a good part of the allocations policy but feel that six months is not a long enough period of time.
- I think that the period should be longer - at least 12 months. This would ensure continuity of employment
- I think the time period should be 12 months from starting the employment as this gives both the employer and the person employed to see if they are suitable for the position and if not and leave this then leaves them have been allocated a house/flat they could continue to live in it an be out of work stopping another more suitable applicant from being housed.
- Priority should be given to people who live in Central Bedfordshire.
- 2 years
- It needs to be 3 yrs. MIN or it could be used as a 'loop hole' to Instant housing, then they could commute to London with a house in Beds. Nice one eh!!

In the National Housing Strategy published in Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households.

The majority of respondents (67%) supported this proposal, however there were mixed views on whether the six months is too long or short a period in which to establish a local connection.

Respondents were concerned that people could access social housing by working in the area for a relatively short period of time. However the Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Others expressed concern that six months was too long to wait, especially if this meant a household had a long commute or had to pay for two lots of accommodation. However households accepting employment offers in CBC will be aware of all of the facts when deciding to accept the offer of accommodation.

On balance it is felt that six months employment is the correct time in which to become eligible to join the register, having to wait for a longer period of time may have a negative impact upon people's ability to sustain employment.

Some respondents felt that working households did not need access to social housing as they could afford to resolve their housing situation themselves. The aim of the Policy is to support low paid workers, and support households to remain in work. In addition to this it is hoped that the Policy will create mixed and sustainable communities. This part of the policy will only apply to households on relatively low incomes, as households with incomes over the income thresholds will not be eligible to join the register.

Q4. The new Allocations Policy proposes not to allow people to apply to the housing register if they have enough income to buy their own home or rent a home privately. It is proposed that different (before tax) income thresholds should apply for different property size needs as follows:-

- **Needing a 1 bed property - £30,000pa household income threshold**
- **Needing a 2 bed property - £40,000pa household income threshold**
- **Needing a 3 bed property - £50,000pa household income threshold**

Do you agree with this idea?

- This is basically saying that anyone with a wage of 30,000pa should buy a property or rent one privately. This is surely infringing on any ones right to housing. When housing around Dunstable Houghton Regis is very low. Why aren't the new builds advertised many would wish to live in them and would be giving up there own homes
- Every person's situation is different. Some private rents are very high and would not necessarily secure a nice property. There are very few one bedroom properties for rent, or available to buy on a £30k income.
- Income threshold too low. Start at £50K for 1 bedroom.
- Even with that income it's impossible to get a home loan. The amount should be adjusted

- I believe these levels of income are not necessarily enough to allow easy renting or purchase
- Everybody should be allowed on register with priority given to those on lower income
- The threshold should be lower for those requiring a one, two or three bedroom property. As social housing should be focussing on those who are in financial difficulty. I believe that the threshold should be 1 bed property £25k, 2 bed property £32k, 3 bed property £40k.
- I think someone with £20.000 has enough income to purchase a 1 bed. £25.000 is enough to buy a 2 bed and £30.000 is enough to purchase a 3 bed
- I earn 30.000 but do not have the means to put down a deposit and am also of the wrong age to do so.
- The figures given do not represent the cost of buying property in this area.
- A low income family will require a larger property than a one-bed flat!
- Because although their income is at this figure on application it could go down if/when a child is involved
- DISCRIMINATION
- The ability to buy or rent a home based on income is flawed by too many other factors.
- If the applicant has a disability e.g. in a wheelchair and needs specific adaptations then no landlord who private rents a property will be obliged to adapt the property and if only one person on the application is a high earner due to their partner being disabled then they still might not be able to qualify for a mortgage high enough to buy a property in the area.
- Private landlords do not give long term secure tenancies.
- If a person has a good wage they would look after the property better than the council do.
- If they have a medical need for special housing they should be allowed on the housing register.
- Everyone who haven't got own house should have chance for council house

- As I have previously pointed out, DEBT is a huge issue at the moment. So even if they are earning high their outgoings are more than likely higher too. Why else would they apply for housing i.e. Divorce, debts, Child Support Agency. There are more than likely people on a high level of debt
- The cost of living is sky high !..... if you earn £30,000 per year then you have to pay tax, then you have to pay the following: council tax, gas, electric, internet/TV, water, mobile/landline, TV licence, upkeep of property, furnishing house, clothing, food, etc. etc., and what are left with, NOTHING ! And if you own a car to go to work then you can add all those costs as well!
- Property prices too high to make these figures realistic, but there should be 3-5 yr. contracts.
- Age is also an issue, over a certain age mortgages are not available.
- The thresholds should be higher and it should be noted there is no security in renting privately. Association/social housing is a better 'feeling' to be in than private. You pay rent back to 'society'.

71% of respondents agreed with this proposal, and 75% considered the thresholds to be fair. Concerns were raised that the thresholds were too low, and that many households on those income levels would not be able to afford to access homeownership or private rented accommodation. The figures within the policy are well informed and have been modelled on the average property price, using property prices in the lowest end of the spectrum for each property size.

The Policy has a sliding scale of income thresholds that take into account both the family size and total income.

Assistance is available to households wishing to access home ownership through a range of low cost homeownership products including the Government's Homebuy scheme. A range of support and advice is also available for households to enable them to access the private rented market.

Views were expressed that outgoings should also be taken into account. In the interests of having a simple and transparent Allocations Policy this is not considered to be appropriate. However there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q5. As proposed, the new Allocations Policy will prevent people being placed on the housing register if they have savings or assets of £23,250 or more.

Do you agree with this proposal?

- This seems a high amount - but I am guessing that it is the same level of assets for an elderly person going into care. And I can't see a prospective tenant giving you a bona-fide savings book showing such a high level of savings!!
- This amount of savings would not necessarily be enough to secure a deposit on a mortgage.
- Savings or assets are too low. These savings are regularly for emergency funds. Why penalise savers!!! Any level should be at least £50K
- I agree with this proposal for people of working age, but someone retired with only £23k assets would be unable to buy, and this would not last long as rent.
- Tenants will be unable to receive Housing Benefit with savings, but their savings will soon deplete if paying higher private rents.
- How much you have in savings shouldn't matter.
- I think that we may be causing some people to fritter away their savings and then they may have to apply to us a few years down the line when their savings have been exhausted. This should be done on a case by case basis, for example, an older person may wish to have this money to pay for extra care should they need it.
- The savings levels will be affected by the number of people to be housed and a fixed figure for all is not applicable
- Should be open to everybody with priority given to those with lower income and/or savings
- I would be concerned for people with severe disabilities who may inherit money which may exclude them from accessing appropriate housing specifically designed for their needs. So I think there is a case for exceptions. Otherwise I think it would be fair to have savings thresholds
- I do not feel this sum is high enough.
- Some times they have to use this to live on

- How long before they drop below the limit, and then need to get on the register?
- I agree that there should be a savings/asset limit, but this amount may be insufficient - not enough to buy, unless in reasonably paid employment; could privately rent, but may not last long.
- Are we not supposed to save for old age?
- In today's world £23,250 isn't all that much. Not enough for furniture a new home, plus all the bills a figure more like £40,000 would be fairer
- Saving towards a deposit e.g. for shared ownership should be encouraged. A higher level should be set (40k) and the policy should index the amount annually to house price growth
- I think cases should be considered individually - my concern is the amount of deposit required to buy a property, and the type of employment. For example in some industries in the area it is 'standard practice' to be self employed and in this situation it is almost impossible to get a mortgage until you have at least 5 years of 'solid' accounts. Also, £23,250 is not much when you take into consideration the cost of stamp duty, legal fees, basic furniture etc. when setting up home. I think the savings cap should be more around £30,000. Also 'assets' is not the same as having actual money available.
- If they have a medical need for special housing they should be allowed on the housing register.
- Savings are savings and are not a regular source of income. Once they are gone they are gone. So if you have to put a limit on savings you should say £100,000 as savings that would prevent.
- Savings and assets should be considered very carefully because pension pots should not be included. In any event the figure you suggest is far too low.
- Actually NO I did agree but thinking about it even if someone had enough money for a deposit to buy a house what if they couldn't get a mortgage due to bad credit rating
- We would wish to see a more accurate definition of what would be included under assets. The monetary figure quoted is far too low given the current price of accommodation throughout the area.
- So if you 58yrs old and you have saved all your life and you now have £23,250 you should not be allowed on the register !... so should that person go to a bank for a mortgage ?.... what mortgage company will give him a mortgage ?... and when he retires what should he live on ?..

- Would like some greater consideration given to this clause as "assets" may not always be items which a family would comfortably dispose of in order to fund their housing needs (for example items of sentimental value). Their unwillingness to part with such items could therefore make their application to this scheme invalid.
- This penalises savers and elderly
- Your new policy precludes people who have a very low income and do not qualify for a mortgage e.g. because they are on benefits and would not be accepted by a private landlord either
- It requires further qualification, it should not preclude those who cannot obtain a mortgage or can't rent privately.
- Regarding the 'Thresholds for Income and Savings': Savings seem a bit low, knowing how hard it is to get a mortgage these days. Anyone self-employed (more and more people are) will need to produce 5 years of decent accounts to even be considered. The current threshold would mean anyone in a self-employed situation and steadily saving up for a deposit on a house will get to the point where they are penalised. We would be happier if the savings threshold is adjusted to around £30k. We are not sure if the threshold is 'household' or 'per person' – assuming it is 'household' it is a bit low.
- Ridiculous discriminating £23,250 possibly somebodies life savings yet a little to help in a pension income. Savings or assets should be much higher
- In this day and age assets of the above sum aren't very high. Owing to the view, the cost of living keeps rising.
- Both couples (man & wife) should be allowed that money each. I have worked all my life 60 yrs, saved and paid all taxes.

59% of respondents agreed with this proposal. Comments were received that this figure was too low, and that this amount of money would not enable access to home ownership, there were also views expressed that savers were penalised under the Policy. Social housing is a scarce resource. The demand clearly outstrips supply, and as such those who have the financial means to access either private rented accommodation or home ownership will not be able to access social housing.

The savings threshold relates to the savings and assets of the whole household, and is in line with tests applied by the DWP and Social Care.

This income and savings threshold will not apply to the Older Person's Housing Register.

In relation to the savings of vulnerable groups there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q6. The Council is proposing a much simpler system for banding applicants for housing. At present, applications are assessed in detail to see how urgent their housing need is and placed into one of four bands - URGENT NEED, HIGH NEED, MEDIUM NEED and LOW / NO NEED. People can move up and down within their band depending on their level of need in relation to other applicants. This makes it difficult for people to understand what is happening with their application.

Under the proposed new system, there are two bands; one for very urgent housing need cases, and one for all other applicants. People will wait for housing, in the bands, in date order.

Do you agree with this idea?

- I have disability and I have stairs in my flat. I have tried transfer and find it totally wrong housing associations don't communicate with each other for available properties. I am presently in band 3 and can't manage the stairs. I think these changes would create more people sleeping rough. I think people need to have HOPE which you will be taking away
- Presumably those prospective tenants who do not meet the criteria will not be included in the second band? And that would mean that only applicants who are genuinely likely to get a property, because of their circumstances, are banded.
- I agree in essence. However, if urgent refers to people who have just entered this country and have nowhere to live, then I disagree.
- Existing system is fairer
- Bands do not provide fair assessment of needs.
- I do worry that with having only 2 strict bands there will be applicants in need that will not be accommodated and this could impact on other services; mental health, depression, homeless housing options, financial problems with debt because they are unable to live and pay their rent.
- Steps should be taken to reduce waiting time not increase it. This could increase it.

- I understand the need to simplify the system but I do think there needs to be a balance between this and having a hierarchy of need. In practice what your proposal suggests is that those with urgent need are treated as in high need and those with low need are banished from the register, and I am concerned that those with urgent need will lose out as a result.
- I think that the current system works well and brings more social benefit to the community. It also means that hard to let, or low demand properties should still be let fairly quickly to those who choose them rather than high need applicants being dumped in them. The low need band can still have an income threshold. I believe that we have sufficient housing stock to allow a 4 band system. The proposed system is likely to leave many properties empty for longer and then perhaps go to those with no need at all through available now.
- Some harder to let properties are let to people in lower bands. Housing associations will struggle to let those properties if there are only 2 bands
- The needs for social housing are many and various and I do not believe that two bands would truly reflect all applications.
- I believe current 4 tier banding works well
- They should keep the 4 bands system
- It doesn't give any flexibility for people's circumstances.
- There are many people on the register at present who are not covered in band 1 or 2 that I feel still should be considered
- Two bands would be too generalised and those in band 2 would find it extremely difficult to be housed yet they would have strong needs to be housed
- I see no issue with the current arrangements. An open housing register must be the most transparent
- DISCRIMINATION
- Cause I've been waiting long enough to be rehoused. No one seems to care that three of us are squashed into a small one bedroom flat with rubbish heating and mould running down the walls causing health problems.
- Would the date remain the same as it is now or will they be reset? Should they stay the same then I agree with this

- I know by my own experience that we cannot trust your method of assessing the need of applicants. When your date comes round, what then. Sorry you don't meet the needs chart so you'll need to apply again?
- Each case needs to be individually assessed
- Urgent to me means damage by fire or floods NOT COMING IN FROM OUT OF THE DISTRICT like foreigners (NO I am not a racist, but charity begins at home for those that have paid their dues and taxes).
- Two bands are very restrictive; most people will fall into band 2. Although the policy refers waiting in date order this is not strictly true as the employment priority proposal will override this.
- I think people who have lived in this country for more than ten years should have highest band.
- I feel that this would make people with mental health issues even less of a priority. It's all ready bad enough for mental health sufferers to get extra medical needs points.
- A more one on one system need requirement but with banding levels for new customers
- The system is unfair, British people that were born in this country should automatically go into band 1 - 2..... Immigrants should be placed in band 3 -4....
- This is too restrictive and doesn't allow enough flexibility according to individual circumstances.
- Please clarify- is this not the same as Q1?
- But being simpler does not necessary mean less hassle/frustration for customers to be rehoused.
- Very Urgent will have to be strictly defined or, it will be used as 'almost Very urgent and flexible there fore VERY wide OPEN to be abused
- We are concerned about 'overcrowding' being in band 1, as we feel this to be an open invitation for people to get higher up the list just by having babies. Surely there should be a system whereby people can request a larger house because they wish to start / add to a family, rather than have to become a case of overcrowding first and then get bumped up the list.
- Don't know of this system is fairer, couldn't somebody be on the list for ever without being housed? Monday to Friday I live in my lorry in

motorway service stations and return to my elderly parents home 40 miles away. 7pm Friday evenings until 3am Monday morning and I was offered band D

61% of respondents are in support of this proposal. Concern was raised that people with no housing need would no longer be able to join the housing register. Whilst the current policy enables people to join the housing register in practice these individuals have very low priority. The new policy aims to be a more open and transparent system, whereby individuals are much clearer about their prospects of being able to access social housing. We feel that this new system provides a fairer and more honest service for customers, in so far as customers understand their chances of accessing social housing, and if these are poor can be supported in accessing alternative housing options.

Social housing is a scarce resource; demand outstrips supply, and therefore social housing needs to be targeted at house holds in housing need.

Whilst there is support to continue to have 4 bands, the current position is unsustainable. The current housing register continues to grow annually and is largely made up of individuals with no prospect of being rehoused.

In order to ensure that all social housing, including low demand properties, are let in a timely manner an Available Now window will be introduced. These properties will be made available to individuals who are not on the housing register.

The new policy is not anticipated to lead to an increase in waiting times to access social housing; there will be fewer individuals on the housing register and as such less bids for each vacancy. Applicants will still need to actively bid for properties to ensure access to social housing.

Applicants eligible to join the new housing register will retain their existing joining date. Within each band, priority will be giving to those who have been in the band the longest. Those in employment will be given priority over households not in employment as defined within the Policy.

In response to concerns that the policy provides no flexibility to consider individual circumstances there will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

**Q7. The council proposes the introduction of an 'employment priority' into its allocations, so that working households are prioritised for properties over non-working households.
 Employed people will need to prove that they are employed for at least 16 hours per week, with a contract of employment.
 Volunteering and apprenticeships will count as employment provided these are similarly formalised arrangements.
 As a high proportion of households on the current housing waiting list are non-working, this will not mean that non-working households cannot get a property, but they may wait longer than a working household.**

Do you agree with this proposal?

- Again discrimination. If in employment in the area then try letting agencies but still allow them some banding so as to get into CBC. Also making sure the work is consecutive during the 45 wks of the year. This will not be cost effective for council and will push council who are already dealing with fraudulent claims etc. to their limits by making sure this person is going to be working solidly....If agency work it may only be temporary then what??
- In some cases stabilising people who are not working by providing a settled home may be an incentive to find work
- This discriminates against people who are unable to work e.g. due to health and disability reasons etc.
- Unemployed people are penalized enough.
- Social Housing should be provided for those who are most in need of housing and cannot get it through other means. This proposal means that those most in need, i.e. those who are not able to fund their own accommodation through work, lose out to those who are working and could potentially find their own accommodation, not least because they could have assets up to £23k and still qualify! Your proposal leaves leeway for those with 'disabilities'. Closer inspection shows this to mean people who receive the ESA support component. This therefore excludes a large swathe of people who the DWP consider to not able to work due to illness or disabilities and has placed them in the Work Related Activity Group. Whilst the Work Related Activity Component is meant to be for those who can't work now but could maybe work soon, that group in reality is shunted to JSA and then cannot claim because they are too ill to work, so have to appeal and get their decision changed at a Tribunal. This is not your system, but it is broken and you should not rely upon it. In other words I think you should consider those in either ESA group as not able to work and therefore give them Employment status, if you are to go ahead with prioritising those with Employment status for housing. You also have not considered that sustainable housing is often a prerequisite to sustainable employment.

In summary, I think this particular part of the policy is fundamentally flawed. The private sector by and large shuns those reliant on benefits, so the social housing sector, being state led and not market led, MUST provide that gap.

- This is a bit 'chicken and egg'. It is a simplistic way of looking at allocating social housing. While the idea of 'something for something' is laudable it does not address the complexities of individuals applying for social housing. I believe that it is difficult for someone to sustain employment while they are in housing need. For many people I believe that they should be able to establish secure and suitable housing before they can concentrate on employment, this policy will discriminate against those individuals that require more support in this area.
- Social housing should be more for people that cannot obtain housing any other way. Working households stand more of a chance in buying or renting privately. Also discriminating against people that CANNOT work for medical reasons etc. Everyone deserves a second chance. People may get penalised for bad behaviour when it may not have been directly their fault i.e. in a bad relationship or they may have been young, naïve or vulnerable at the time. Should be given the chance to demonstrate their behaviour has improved.
- Each application should be taken on its own merits and non working applicants should not be penalised if they are unable to find work. This will also push non working households into private rented property thereby increasing the amount of Housing Benefit claimed.
- Many people would like to work but cannot gain employment for various reasons.
- Would applicants that have been made redundant be considered?
- I don't see why people should be penalised because they are unable to work or find employment
- I don't agree. The purpose of council housing should be to assist those with the greatest need. Especially in a poor economic climate.
- Surely people that are unemployed will be needier of a property. At best I don't think it should.
- Most jobs advertised now are part time or zero hours. Where will non working people live who need to be housed? You can't get a job without a permanent address!

- So what is the proposal for these non working households? The streets, a workhouse? Whilst there are no doubt a proportion of these people that can work and choose not to.
- May be difficult to monitor if applicants are in and out of work. What will happen to very urgent?
- To discriminate by income is a crime surely. If not it should be. I thought your role was to provide for the people that appear to need and not only for those that can afford to pay there own way. Where do those people without a wage go from here?
- Employed people will pay their way AND look after a property whereas unemployed don't look after properties; also have to be subsidised by the council.
- This is not equal opportunity, CBC are penalising those people who do not have a job. In the current climate a job is not always easy to achieve. This is a fundamentally unfair criterion. From a voluntary sector viewpoint Volunteers do not have 'Contracts' because of employment law this would not be a term used in any arrangements we with volunteers. This would put both volunteers & us in an entirely different legal relationship. The VS might use the term roles and expectations, (not job descriptions for example), and would not have the normal expectations required of an employee – e.g. in terms of hours, regularity, fulfilment of actions etc.
- I am assuming this does not include people past retirement age. Extra support means spending more money!!!
- I don't agree with this some people are unable to work due to medical grounds. My husband had to.
- Agree in principal that working households should be recognised for their status but, thereafter, individual circumstances (such as ill health) should be taken into account.
- If someone is in work, they are more likely to be able to afford to rent privately or to buy. Council housing should be reserved for those who are not able to do so for whatever reason.
- Yes in principal providing the reason for not working is properly assessed.
- Secure & certified Employment must be for a MIN of 6- 18 months and not just a 6 months short term shortcut to housing.
- I lean to the idea that 'working households' should be priority in housing. But every case should be looked at individually.

66% of respondents agreed with this proposal. Concern was expressed that often individuals who were out of work were in the greatest need. In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Households not in employment will be given advice and support to access employment. The housing options team will work closely with partner agencies to ensure that targeted advice is given to households in housing need wishing to access employment.

The Policy will not discriminate against households who are unable to work due to medical reasons. Those in receipt of DLA because they are unable to work will receive same priority as working households.

In order to ensure that the Policy is not abused, people's circumstances with regard to continuing employment will be regularly reviewed. All Housing Register applications will be reviewed annually. Moreover verification checks will be made at the point of offering a property.

Q8. We propose to exclude people who are bad tenants from the housing register. This includes people who have a poor tenancy history, those who owe rent from a previous tenancy, and people who have been violent, abusive or threatening. The Council will ensure that those households who are excluded will be given support to change their behaviour so that their application may be reconsidered in the future.

Do you agree with this proposal?

- Needs to be looked at on a case by case basis.
- I don't think the council should be responsible or spend their budget on having to improve a person's behaviour it should be common sense to each person how to behave.
- Those in this situation are most likely to have a high need for help. There may also be reasons why they behave that way, e.g. difficult upbringing.
- The council must see that whilst being a bad tenant cannot be condoned. There seems very little thought as to what to do with these people. "Support to change their behaviour" is great but where will they live for this support to be given

- Although I agree that these people should be excluded from the housing register, the new housing allocations scheme needs to define who will be deferred from the register. If the allocations policy does not go into detail and each case is considered on its own merits, it will take the housing register team a lot longer to come to a decision on each application.
- You already do this. I mean exclude applicants. What future and when? I think there are many considerations that should affect this attitude.
- Although in principle I agree with this statement, there are concerns for families where one partner falls into this category and all the family including the children suffer. There needs to be flexibility and individual case reviews.
- I feel people need to live somewhere and the stagnant system does not help with these issues.
- We are concerned that there should be very robust support for those being excluded. It is also suggested that, in line with the Council's intent on giving support to those who change their behaviour, after the words 'abusive or threatening' should follow 'within the 5 years immediately prior to their application'.
- This is all very well, but where are such people to go? Private landlords will not take them if they are aware of their behaviour or rent arrears.
- Frustrating knowing that the council manage to successfully evict a tenant who breaks their tenancy and then they come straight back into the system. They need to learn in order for us to reconsider them; they need to change their behaviour.
- I would say YES only if they, and ALL members of the Family have continually changed there ways for 9 - 18 months for ALL of the Family and not just the parents.

80% of respondents agreed with this proposal. Views were expressed that applicants should be considered on a case-by-case basis and that there would be a need for flexibility and individual case reviews. The Policy states that cases will be assessed on their own merits. Applications will usually be reconsidered after 12 months. Earlier reviews may be considered in exceptional circumstances.

A detailed procedure guide will accompany the Allocations Policy, which will ensure a fair and consistent application of this and all parts of the Policy.

Households will be supported in changing their behaviour and there will be close working with key partners to access appropriate support.

Concern was expressed in relation to where individuals excluded from the Housing Register will live. The housing options team will continue to provide advice and assistance to households to enable them to access appropriate accommodation and support.

Q9. Low paid workers who rent their homes from a private landlord are not treated as being in housing need in the current Allocations policy. The new Allocations Policy proposes to give people in this situation a better chance of getting a Council or Housing Association home.

Do you agree with this proposal?

- If people already have a suitable, decent home, why do they need to be on a Council register?
- They have a right to bid on properties as some properties will never be there own. Some private landlords do not allowed decorating etc. How will these people feel secure as the tenancy could be taken away from them with in 3 months WITHOUT them being proved bad tenants? Also low paid workers means just that low paid. Not a lot of landlords want low paid. They insist on a months rent plus a months in case of damage etc.
- Because most of the low paid workers are not from this country
- Should be based on housing need
- If they are in private rental accommodation and not struggling with the rent/bill why would they need to be given a higher priority? Surely they are adequately housed in accommodation they have chosen. However if they are in private rental accommodation and just about paying their rent with no money to live then yes their priority should be higher. I agree that people that live in Central Bedfordshire should have a local connection because they have lived continuously in Central Beds for a period; but what about applicants that have moved to the area and have been living in the area for work 6-12 months (3 years is a long time to wait before you are eligible for housing if you are in need). It does seem unfair that family local connection has been removed from the policy because applicants sometimes need to move back to the area for family support/child care/elderly vulnerable applicants needing family support
- Those reliant on benefits - particularly through illness or disability, may not be able to manage their tenancies in the private sector if their rent is above the relevant Local Housing Allowance. Exception should be made for this group also. But overall it is good that some people will be allowed to move in from the private sector.

- Contradicts the proposal of those in private rented not being a priority
Some people need/ want to move to an area for family support etc. so should be allowed on the register if they can demonstrate this.
- No, they are currently adequately housed.
- Housing should not be based on ability to pay but on social need.
- Not sure on this as surely they were low paid prior to taking on the commitment of a property.
- What do you consider low paid? How much better chance?
- Just because they are low paid doesn't mean anything.

85% of respondents agreed with this proposal. There was a view that households in the private rented sector were adequately housed. However the Council wishes to support low paid workers who are struggling to make ends meet in the private rented sector. A low income is defined as an income less than £24,000 per annum.

In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

Concern was raised that households in the private rented sector unable to work due to health issues or disability may also be struggling financially. There will be provision within the policy for dealing with exceptional circumstances. We appreciate the Allocations Policy cannot be drafted to take into account every possible circumstance. The Housing Needs Panel will look at truly exceptional cases

Q10. Do you agree that older people who do not demonstrate 'housing need' should be able to bid for vacant older peoples' accommodation, where these properties attract no interest / bids?

- I do agree with this, but wanted to say that only if there is a support need.
- Why would anyone that does not need a bungalow want to bid? I think your interrogation process will establish if they saved for there retirement or have a house or a villa in Spain. Give me one of these places.... Yes please!!!

Of those respondents that answered this question 80% agreed with this proposal. Housing related support will be provided to those households where a support need is identified.

Q11. Please give any additional comments you would like to make on the proposed changes to the Allocations Policy.

- Why has it taken you so long to come up with half decent proposals to focus on need as opposed to allowing the abuse of the system by spongers?
- A lot of these changes will cause a lot of problems. I don't work and disabled and only in band 3 my housing association has never contacted me although I have been on the transfer list for over a year now. I would like a 2 bed because I receive DLA I think we should be considered allowed to bid on 2 bed. Especially if it is hard to fill. After all our DLA is to help us with our disability and I am epileptic and suicidal tendencies and would be willing to pay for that extra bedroom.
- The income bands are set too high. Someone earning £30K can easily rent a one bed house in the private sector
- Your threshold earnings are far too generous. They should be set lower. For instance I have people renting one bed houses at £400 to £475 per month. This is good enough to pay a mortgage a £30,000 income threshold is too generous and allows too many well paid to compete for a limited resource when they should be in the first time buyers market.
- The new proposals seem sensible and solve some of the issues previous policies have not addressed. I assume that the current allocations policy for affordable housing with priority to people in that particular parish getting priority will be continued.
- Ethnic Brits should have priority over immigrants who have not been UK residents, working and making a contribution, for less than 5 years.
- If the older person's accommodation is difficult to let why would there be restrictions on the older people accessing the housing register, surely you would need as many older people on the register so that the difficult to let properties are filled quicker.
- I would like to see a bit more help for people like me and my family when it comes to anti social tenants. We moved through the choice based lettings scheme, to get away from such people, only to be told that one of those families is to put on the village where we have moved to. Nobody cares about the situation that we are being placed in. We have been very happy where we now live, but when this family are moved in, we are going to go back to being miserable again, and my

children not being able to walk down the street in peace, having to put up with verbal abuse, and more.

- I believe for sheltered /supported housing the age should go back to 60 years. I know of schemes where 55 is allowed now, the people in them still work and do not even have supported calls so surely do not need this type of home. This age group also do not mix in with the community as once they come home they just close the door on the outside world.
- I am concerned that this is just about reducing the number of people of the housing register regardless of the detrimental effect on members of our community who apply for social housing. Statistics should not come before the benefit of the community and the individuals within it. I am also concerned that this will increase void periods of many social rented properties.
- It would be interesting to know the reasons for the proposed changes to the Allocations Policy. These should be published alongside the consultation document.
- Get rid of the bad tenants have a zero tolerance policy and stop being so liberal its very nice in Grimsby send all the criminals, druggies and low life up there. Stop allocating traveller sites to gypsies that no longer travel rehuses them in Bedford town centre.
- I am particularly concerned about older and more vulnerable people accessing social housing, and also the impact of bedroom tax leaving our housing association at least with a complete imbalance of 2 and 3 bed houses. I believe the current policy works fine and should be left as it is.
- Stay with the original 4 banding process. I agree homeowners should be excluded unless they are being repossessed or due to the home no longer being suitable due to deterioration in health. I think anybody with ASB in the past or present should be excluded from joining the register as I don't think it is fair to other council tenants who pay their rent on time and are peaceful tenants to have to put up with problems neighbours. I think if anybody has any type of housing debt they should be excluded from the register until all the debt has been cleared.
- I would like to see priority for housing being given to citizens who are British and have lived in this country, and worked in this country for a period of 10 yrs. I am very concerned about the amount of people from EU countries who are being given new properties above UK citizens who have lived here for a long time. I constantly see Polish and Eastern European Citizens getting brand new houses and flats in my area and we are really sick of this. There will be social unrest in this country if this carry's on. Would we be given new flats and houses if we went to their country? I think not. They are very nice people however;

they should not be able to jump the queue for housing above British people....

- Your basic problem is that there aren't enough houses, particularly not for people needing social housing. You should only give planning permission for new developments if at least one third of the properties are available for rent by people in housing need. Your current proposals are merely shifting the deckchairs on the Titanic.
- I am concerned over the older people section. I do not feel that Extra Sheltered should be the only new build for this section. I believe bungalows should be increased in the whole of Bedfordshire. I also believe all Retirement people should be able to apply for two bedroom properties especially bungalows. Bungalows in this area generally small and virtually impossible to have guests. In this day and age when we actively encourage inclusion and with families not staying in the same area we should help people to not feel isolated. I hope if a working person over 50 would not take priority over a retired person wanting to down size to a bungalow? How would a retired person stand if living in there own property but requiring a level access property due to health needs? I really feel that Bedfordshire should be looking at the housing stock and allocations more thoroughly for the increased elderly population due in the coming years and not just Extra Care as I state above.
- I have been on the list for 3 and a half years, living in 3 rental properties in this period with my 2 daughters aged 11 & 6. I work part time; I pay my bills & have a good credit history. I have always impressed these points when bidding on the system. As far as I can tell, the new proposals will actually benefit me. I am fully aware of people in other positions being advised to quit their jobs, claim every benefit they can to enable them to further their applications, & actually being rewarded with a council property. I do not see how this is fair, unfortunately it is the system, People should be encouraged to earn their own money & pay their way in society, set an example to their children. Work should reward, not benefits.
- Please make sure that 50+ tenants are treated fairly and able to bid on properties even though they may not be working.
- This survey looks like the council want to make political ideological changes hidden behind a poor economical climate as an excuse.
- I see this council discriminates against people still, just like they have my dad , and where is he now been homeless for nearly a year and he works in your area , have left him out to freeze still when he is ill, what a disgrace , we would like to know where he is as we haven't heard from him since he contacted you in Feb or March and told us you wouldn't help him such a disgrace of a council

- Do married couples get more priority than none married?
- I think all the proposed changes to the housing register would be fair to all good applicants.
- I do feel that the overcrowding does need to be addressed a little bit more, my own personal circumstances are that we live in a 2 up 2 down property with one bathroom and 6 people living here, 2 adults, 3 girls (21) (7) & (5 1/2) they all share the same small bedroom then our 4 year old son shares with us this has enormous problems and does have an effect on family life, we have been on the register since June 2011 and nothing There always seems to be loads more people with more needs as we currently only have 2 needs so hopefully this may make a difference (hoping)
- I am not expecting anything you read from this exercise will have any affect on the conclusions you give us.
- I agree with most of this..... but there are people who might need to move due to circumstances. and might need to go on the bidding system, as some people are on the exchange list and not getting anywhere as the exchange website are not going anywhere fast and bidding might be the only way they can move.
- Consider that not just the elderly need bungalows for accommodation. Some applicants are wheelchair bound and are not being offered properties of the right specification because they are not the age specified. Disabled people should be assessed for their housing need and taken into consideration for over 50 and 55 properties if these fulfil their needs. Adapting a general property for disabled person requirements may end up costing central Bedfordshire council and social services more money in the long run than offering them suitable accommodation that is already adapted.
- The introduction of Housing Transfers should be reintroduced. Instead of working purely on points the Council needs to work on common sense needs as well.... we have a three bedroom property in Letchworth and a one bedroom property in Potton, we only want a two bedroom property but common sense does not prevail when different authorities will NOT work together creating homes that are needed and allowing those wishing to marry to downsize.
- I am a single parent of two children and would like to live closer to help an elderly relative. I work and rent privately as I wanted to show my kids a good work ethic but this does not help much as we live in heat poverty and my daughter has cried as their has not been much food in the cupboard. I am disadvantaged because I work and rent privately.
- Elderly in privately owned properties who wish to downsize (due to death of one of the parties or ill health) SHOULD BE ALLOWED (AT A COST TO THE COUNCIL OF 10% OF THE SELLING PRICE OF

THEIR OLD HOME) to go on a housing list AND be marked as priority as this would allow a family to move into their old home. Too many unmarried mothers are given priorities. There are too many elderly homes being pulled down to make way for unmarried mothers in Biggleswade. Where can the elderly go now, not many vacancies elsewhere AND WHY SHOULD WE MOVE OUT OF THE AREA WE

- I personally feel this Housing Allocations Policy needs more work on the impact assessment of the different circumstances of people and families. One instinctively feels it will penalise some families who should not be penalised and may lead to more money being spent by CBC through needing to provide other council services. HAVE LIVED IN ALL OUR LIVES??
- No mention of allowing very local e.g. village ties to provide some priority in allocation. I would like to see more housing available on a very local basis to people who have lived a long time in a particular location. Village exception schemes are NOT enough.
- I am very concerned about the next generation not being able to live in their 'home town/village' because they would not be eligible. I welcome the proposed opportunity you are giving to people in that situation to be able to put their names on a list. I also wonder if some sort of 'start up' scheme could be introduced so that young people starting out can have accommodation with very cheap rent for the first 5 years to enable them to save up and get off the social housing requirement (freeing up space for the next person). Perhaps you could also consider a scheme where two young people could apply for a two bedroom start up so that two friends (or siblings?) could share the cost. I would also like to point out that under the 'Statutorily overcrowded' definition, people can still get to the top of the list simply by having babies. This system needs to be improved - those who wish to increase the size of their family should be able to put themselves down on a list for a bigger property (and be considered under 'level 2' not 'level 1' in terms of priority) and then - once they have the room - have more children. The council should allow people to do this by having a way for them to state they wish to have another child and therefore would like to have a bigger property if it becomes available. If one does not become available, they should have to put up with being 'overcrowded' or delay having another baby until they have the room.
- I think people who have lived in this country for more than ten years who are over 50 should be.
- Please give maximum priority to people who live the closest/ have grown up and have family there and need their own place. Also be more understanding of people with mental health problems such as depression, social anxiety and Obsessive Compulsive disorders. Thanks.

- I feel it was right when I was issued it was not easy and is still hard work now I feel that the issues surrounding moving or getting a property after a year or two that is more suited to your needs has really let CBC down and has made me loose money and has made you lose money I feel it has been a waste of two years that was vey wrong. But at the same time there are very few properties in this area that do meet these other needs.
- I think the policy should have stayed as it was and be able to have as much rights as anybody else even if you live out of the border.as I have already explained some of the areas for central beds are only up the road from where I live.
- People apply like myself as they have no other option and cannot buy a property and are struggling paying high private rents. We are on reasonable pay, but have been declined a mortgage due to not enough deposit, poor credit rating and the amount of outgoings i.e. Loans, car payments & Child Support Agency (Crippling amounts), solicitor fees (divorce). We are struggling to live day to day after paying the outgoings and the extortionate private rent that we have to pay. But we have to pay it as we work in the area and our family are here. We have no holidays, don't go out and yet we could afford to pay a housing associations rent where as people on benefits are living rent free and have holidays etc.
- This policy should not just give priority to Central Bedfordshire residents, but should be refined to favour those in the immediate area where they live, work or have supported family. We are concerned that the policy directs elderly people to access information about available properties via the internet. Many elderly people do not have access to computers or have support networks to assist them to do so. Elderly applicants should be notified in hard format of any available properties fitting their requirements, or additionally an 'auto-bid' system should be set up so that once an elderly person has registered their need and type of property required, the system automatically 'bids' on the behalf, removing both the need for that elderly person to access the internet each time and the delay in response time this would invoke.
- There is a lack of housing and the main reason for this is immigration. 10% of all our housing stock has gone to immigrants and this is not fair. Immigrants should be placed in band 4 no matter what their circumstances. Once they have been here for 10yrs and worked full time during this period then they should be allowed to go into band 3 or even 2..... British people that have been born here and paid into the system are being treated unfairly. British people should go into band 1.... We are the ones that have lived here all our lives, our parents have lived here and our grand parents, we go back generations... example: if a single person who was born in Britain is currently living in a bedsit or with parents, that person will automatically go into band 4.... If an immigrant man comes here with his wife and 4 children and has

no where to live, the first thing the council does is to put this family into emergency accommodation. The immigrant family automatically become a priority and go into band 2 or even band 1.... the whole system is unfair, British people are being penalised while immigrants are given flats/houses... why doesn't central beds council put British people first instead of bending over backwards to help immigrants all the time.... British people that were born in Bedfordshire feel like second class citizens because of the way we are treated when it comes to social housing !.... no wonder there is so much animosity towards immigrants!

- I believe the proposed changes to be good and much fairer to people. I currently am on a lower wage and my husband and I, whom is a fire-fighter, pay a high rent to a private landlord and constantly struggle, month to month. I hope and want the new proposed changes to help people like us who work hard, enjoy our jobs but don't earn a great deal off the back of it.
- I think that this Allocations Policy is a step in the right direction and allows for those who genuinely have a housing need to bid and it will also help make many areas safer.
- On behalf of the members of the Sheltered Action Group, we do not agree with the current age limit for Sheltered Properties 55+. Once the review of the Sheltered Schemes has completed, any remaining Sheltered Schemes should have the age limit increased to 60+. Any remaining Schemes could they be used for 50+ housing as there is a huge shortage in suitable properties for that age group. Allowing people 55+ to move into Sheltered Accommodation drastically changes the ambience of the Scheme and seriously affects the 'Community spirit and involvement' 55+ do not wish to mix with older residents some of whom are well into the 80s and 90s.
- Having read the Policy Document I consider that you have taken account of most of the situation that can arise in the allocation of Council properties, however there need to be a system in place that can check the a person assets are within the figure you have stated, this then looks like a means test would be needed and would people perhaps not be willing to go along this part. If they did not want to be means tested you could not allow them to be considered for allocation of a property.
- I am nearly 37 years old and have been ill with Chronic Fatigue Syndrome, and unable to work for the last 16 years. As a result, I am still living with parents, but my father is 37 and will not be able to look after me for much longer, so I need to find somewhere of my own. My father has recently gone round old people's homes on my behalf, to ask if they would take me at 40 years old, but they only admit people aged over 55 or 60 years old. He has also phoned social services on my behalf to ask what accommodation they provide for people in my

situation, basically nothing. They said that I should contact you. I have some savings, but not enough to buy out right and would not qualify for a mortgage as I am on benefits. My parents live in an isolated village with an infrequent bus service and no shop, post office, bank doctors or dentist. I would struggle to survive if anything happened to them, as I find it difficult to get out with help and would find it almost impossible to get out and do anything on my own. Please tell me where I am supposed to live? How can I survive if no one is prepared to help me? Where do I go from here?

- Agree on the whole with the new changes, but simpler does not always mean less frustrating for customers. If customers are not in the urgent need band, then this could cause more resentment and customers trying to increase their band no matter what. I have tenants in my job already that put pressure on their social worker to get them an urgent band, when they do not need it. I think the amount of bands we have is ok, just need the fine tuning of the current changes.
- With the rapidly growing number of OLDER people, who live in small towns and Villages wanting to down size, they should be considered for a special category of OLDER PERSONS AFFORDABLE Needs. Pregnant teenagers should be refused any housing and only qualify for Social support. They should be encouraged to stay with their parents... Live alone pensioners, War pensioners and disabled should be helped to downsize within their Local Community, where family support and friends are already available...thus less strain on CBC adult services and making it easier to 'Live in the community with established friends / family' Planning permission should be REFUSED for developers and others buying village bungalows and the like and instantly extending and developing them into a 4/ 5 bed high profit units, depriving the village of an asset for locals. The 80 units available at PRIORY VIEW, the new occupants who vacate their present accommodation, that accommodation should be offered to local OLDER PERSONS, rather than developers and get rich quick sharks.
- For decades many have argued yet been ignored as 'racist' by the establishment that immigration causes/creates and makes worse the housing situation for this over crowded country, especially social housing for the low paid indigenous population. I believe all social housing should be for the indigenous i.e. English population only!
- My medical condition which is emphysema which will never improve. Living in my lorry Monday - Friday is not helping my medical condition. I have been divorced for 12 years and have two sons aged 15 - 13 the youngest one is disabled and has severe learning difficulties. I have fortnightly access to my children, but I have no accommodation in which to take them. For the past 5 years I rented privately in Leighton Buzzard, but due to rent increases and utility increases I gave up my flat so as not to incur a large debt. I was born in Leighton Buzzard and lived there for 47 of my 49 years. I have worked for an Eaton Bray

Haulage Company for over 25 years. All that I was offered from Central Bedfordshire was a Band D

- We have been on the list for 15 yrs and have been offered two properties and taken away through the amount of savings we had. We are both disabled and have medical problems, and registered disabled.

This section below only responds to comments not covered under questions 1-9. Where comments relate to the consultation questions, they are covered within that subject heading.

The development of the new Allocations Policy has taken considerable time; this was to ensure that the new Policy is a robust and detailed document that meets the housing needs of Central Bedfordshire's residents. It was critical that the views of applicants, tenants and stakeholders informed the development of the Policy. Engagement has underpinned the development of the Policy.

The key objectives of the draft Allocations Policy are to:

- ***Help applicants in housing need to find suitable housing.***
- ***Provide housing applicants in Central Bedfordshire with a fair and transparent system.***
- ***Provide an incentive for applicants to seek employment.***
- ***Create a simpler system.***
- ***Make efficient and best use of social housing stock in the area.***
- ***Encourage applicants to take a measured and long-term view on housing options and to take responsibility for planning their own housing provision.***

More specifically the policy seeks to achieve the following outcomes:

- ***Encouraging applicants who are out of work to seek employment.***
- ***Balancing reasonable preference with local priorities.***
- ***Providing support for low paid workers in the private sector.***
- ***Practical help for those threatened with homelessness.***
- ***Supporting households who work locally.***
- ***Offering choice.***

Some homes in rural areas will be subject to a rural exceptions agreement, which means that these homes will be let in a different way. This is outlined in appendix 1 of the Allocations Policy.

The Policy proposes to have a separate Older Person's Housing Register for applicants over the age of 50 who wish to apply for sheltered accommodation for older people and designated older persons accommodation. Vacancies that fall within this category will only be open to this group of applicants. Older people wishing to apply for general needs vacancies or older persons designated bungalows who are in housing need may also apply for accommodation through the General Needs Housing Register.

In order to ensure that all social housing, including low demand properties, are let in a timely manner an Available Now window will be introduced. These properties will be made available to individuals who are not on the housing register.

The Banding scheme has been designed assist households impacted by the bedroom subsidy rules by giving priority to those tenants who need to transfer because they cannot afford to remain in their current accommodation.

Central Bedfordshire Council continues to work with key partners to develop units of affordable housing.

The policy does not differentiate between married and unmarried couples.

A full equality impact assessment has been undertaken to ensure that no groups are prejudiced as result of the new policy. This document is available upon request.

Support is available for vulnerable households and other households unable to access ICT. Support will be given with both the application process and bidding. There will also be an auto bid function which will place bids on available properties that match the applicant's requirements at the beginning of each bid cycle. Auto-bidding is available to applicants who are unable to access any methods of bidding and do not have a representative who can place bids on their behalf.

Further response received from Clophill Parish Council is documented below:

Housing Allocations Scheme - Response to Central Bedfordshire Council's Consultation Draft

1. Introduction

- 1a.** This paper is the response by Clophill Parish Council to Central Bedfordshire Council's Consultation Draft for its Housing Allocations Scheme.

2. General

- 2a.** Clophill Parish Council considers that the draft for the Housing Allocations Scheme is, within the constraints of its permitted legal framework, a

sensible and caring proposal. It addresses well the many varied and difficult issues and Clophill Parish Council congratulates the authors.

- 2b.** Clophill Parish Council has two concerns, described below. However, it appreciates that they are most concerned with the practical application of the Scheme, rather than in the wording of the Draft. However, these concerns are addressed below, with the hope that the draft might be strengthened to meet these concerns.

3. Concerns

- 3a.** Clophill is a Conservation Village with a tight Settlement Envelope. Land within this envelope is sold at very high prices. As a consequence, developers seek approval only for expensive, executive homes. Over time, the village is losing its historic, valuable mix of residents. The Parish Council owns no more land within the envelope which it can sell to potential developers of affordable housing at required low prices. Even when legally required to provide a percentage of affordable housing, a developer was recently able, legally, to "buy-off" this requirement with CBC. Clophill Parish Council would like to see the need for affordable housing to be emphasised in the Scheme. However, it is appreciated that this might not be possible within the restrictions of this consultation.
- 3b.** "Trading Down". Several years ago when new, affordable houses were available in Clophill and, exceptionally, reserved for Clophill residents and those with links, a widow who had occupied a three-bedroomed council-linked house was not allowed to trade down to a two bedroomed house, despite yielding a three-bedroomed dwelling. She has since left the district. The Parish Council notes that the Consultation permits such "trading down", but suggests that this should be given more emphasis as this will produce more needed dwellings and be more energy-efficient.

4. Suggestion.

- 4a.** The Parish Council suggests that future developments contain a higher proportion of two-bedroomed dwellings over single-bedroomed dwellings. It is suggested that two-bedroomed dwellings are more flexible and more useful for both occupants and for CBC. The predominance of elderly occupants frequently leads to the need for relatives or, in more severe cases, carers produces situations where existing occupants require rehousing. CBC will also benefit from the additional flexibility of being able to allocate the dwellings to a wider range of applicants. However, it is again appreciated that this suggestion may be outside the terms of reference of the Consultation.

Whilst this suggestion is outside of the remit of the development of the Allocations Policy, it is noted.

5. Conclusion

5a. Clophill Parish Council welcomes and supports the proposals of this Consultation. It congratulates those responsible on its content and proposals. The Parish Council appreciates that its concerns and suggestion may be outside the immediate terms of reference. However, if this is the case, it hopes that more emphasis on the points made be added to the Scheme when finally issued.

Clophill Parish Council

28th January, 2014

Further response received from a parish councillor is documented below:

Housing Allocations Scheme – Response to Consultation

It is felt that the formulation of this Policy should give consideration to older / retired people who live in rural areas, the opportunity to downsize from their current council property which may now be too large for them, to move to a smaller property but in the same locality.

It is here where they will have a group of friends and possibly family who can assist them in their needs on a day to day basis if required. This will take some of the burden off the Social Care requirements for the council in the early years of retirement.

However to make this happen the Council will need to make persons aware of the chance to downsize and the application system simple. Many older people who have never touched a computer can easily be put off applying because of this type of application process.

The need to provide a range of alternative methods of applying for housing for some client groups has been picked up by the EIA. The main alternative way will be by phone, or if required home visit.

The idea of enabling older people to stay within their locality as they move is an interesting concept and the council will explore opportunities for doing this. One such way is to introduce a locality priority for older people, giving those that already live near to a vacancy priority for that vacancy, over others who live further afield. This concept will be explored as par of the policy development process.

Qualitative Feedback and Recommendations from Staff.

Work as a Basis for Housing Allocation.

This is the central theme of the new policy and it is recognised that Members want to reward people in work with additional priority for housing. The policy also makes it clear that it is intended to support people into work. However as the policy stands it will actually exclude many people looking for work from being on the register. They will only be able to register once they have work. This seems counter intuitive as an incentive to work as the applicant has the potential reward of housing only if they actually working and not be rewarded for seeking work.

This approach does not therefore recognise that many people e.g. those that have lost jobs, find it difficult getting work because of their protected characteristics (e.g. BME and disabled applicants) or those just unable to secure work due to poor skills or qualifications, despite their trying are overlooked.

One way to be more equitable is to allow people onto the register if they are actively seeking work and can demonstrate their activity by reference to Job Centre Plus. Where people comply with their JSA conditions e.g. completing their work search activities, attending appointments with advisers or training sessions they should be included on the register. If on the other hand they have been sanctioned by the DWP or have lost their job through being sacked they should not be allowed on the register.

The absence of supporting the genuine aspiration of people on full housing benefit and adequately housed in the private rented sector could be challenged as discriminatory at worst (should they be a disadvantaged group) or at least seen to condemn people with little income to a poverty trap.

In addition the policy awards people who have found their own solution to housing through the private sector but then makes it difficult for them should they subsequently lose their employment. The policy then suggests that an assessment of their likelihood of getting back into work is made. This will entail best guesses or arbitrariness in deciding what chance these people have of regaining employment. This makes the policy seem a very hard one as it will not support people who have fallen on hard times.

The policy tries to address the issue of hardship. In doing so it suggests that if you are working it is not acceptable to have to suffer financial hardship but if you are not in work this hardship is somehow acceptable. Within the private rented sector people who are unemployed may suffer more hardship than

people working. I would expect that people working to pay their rent can afford to do so – should they not then they will either seek alternative solutions or approach the Council as homeless (where they will either be accepted or not). I would also imagine that people working feel they are better off working than if they were not. Without an assessment of this we are guessing people's circumstances.

It is interesting to note that currently we house lots of people from private sector lets. These will often be working and in band 3. If we think people should be removed from the private sector into social housing because we believe rents are too high for working households why are we supporting it for homeless households (and who may well be workers)?

Hardship applies to working households and unemployed households alike. If we look to support households suffering hardship this should be applied to all applicants in a clear and understandable test based upon income and expenditure as notional rents do not tell the whole story. Having said this, this would create more administration and will be subject to challenges.

Recommendations:

- **allow anybody onto the register who can demonstrate that they are working or actively seeking work that are not subject to DWP sanctions or have lost work through their own fault**
- or
- **exclude all adequately housed households in the private rented sector on the basis that they are adequately housed**

This latter option fits in with the Council's support for using the private rented sector to house homeless households as discharge of duty

Households not in employment will be given advice and support to access employment. The housing options team will work closely with partner agencies to ensure that targeted advice is given to households in housing need wishing to access employment.

In the National Housing Strategy published Autumn 2011, the government recommended local authorities to consider giving additional priority for social housing to working households. The Policy aims to support working households and to support wider corporate priorities in terms of the growth of the economy and sustaining employment.

The Council wishes to support low paid workers who are struggling to make ends meet in the private rented sector. A low income is defined as an income less than £24,000 per annum.

The Policy will not discriminate against households who are unable to work due to medical reasons. Those in receipt of DLA because they are unable to work will receive same priority as working households. It

would be difficult in practice to verify if an applicant was actively seeking work, or that they have not lost employment through their own fault. To ensure the Allocations Policy remains simple and transparent it is considered appropriate that households in the privately rented sector who are working are able to join the register, whilst those who are not working cannot join.

The Council will review the policy after it has been in operation for a period of six months. This will be an area that will be reviewed and the impact assessed.

Forming Households and Removal of Bands 3 and 4

Is there a distinction between non working and working forming households living with friends and relatives? What if they are adequately housed – we have doubts as to whether they should be on the register as they could make their way via the private rented sector as a means to get on the register.

If the policy is seeking to reduce the amount of people on the register the inclusion of forming households and working households in the private sector will allow lots of people into band 2. This will make band 2 large and with the demise of multiple needs in band 3 and band 4 itself will lead to many cases of allocation being decided by officers.

There is an argument for putting some applicants in a new lower band i.e. households at home and adequately housed working households (and those seeking work – notwithstanding the recommendation above about working households). This would recognise them within the scheme but also does not accord them the same priority as other groups.

We support the removal of composite banding but having only two bands makes it too narrow a field and lumps most people in together creating virtually a waiting list and not a register based primarily on housing need. This will also give some distinction between those in housing Reasonable Preference Categories and those as local priority groups.

Recommendations:

If we accept forming households and adequately housed working households in the private rented sector put them in a new band below the proposed band 2.

Noted – the notion of forming households having priority has been removed from the policy after discussions with staff groups of the policy has been taken out after consultation feedback

Available Now Window

The intent behind this suggestion is clear in that should properties not be bid for they need to be let quickly. There is no question that delays to letting need to be minimised. However it is our view that the mechanism as proposed poses operational difficulties and is a roundabout way to house those not in housing need. Having done away with band 4 and part of band 3 this seems counter productive as we will once again be encouraged people to approach the Council for housing even if the chances are low.

If we have a register on the basis that we accept it is those on it that have housing need (or other special reason i.e. local priority groups) then we should be seeking to ensure that these people are being housed. Therefore we think that the Available Now idea is extended beyond the homeless households' pool to include all existing applicants. Therefore should there be any properties left unbid for after advertising, we make direct offers to people who have not bid for them in accordance with their needs. This approach will ensure that those in need are either being housed (the purpose of the register) or they are down banded or removed from the register should they refuse the offer. This will help impose a discipline upon those on the register to bid and reduce properties going to those without a recognised need.

This approach will also be easier to administer. We are concerned that to enable the proposed Available Now approach will require some form of registering people outside of the main policy to bid on properties when they become available. To enable this will require administration both in terms of setting them up but also in terms of selecting and verifying bidders. If we are of the view that we do not want to band applicants that are currently in band 3 or 4 then having the Available Now window is effectively a return to this by another route.

We have recently undertaken reviews of band 1 and band 2 applicants who have not been bidding. This has shown that many applicants are just inactive on the register waiting until such time they believe something they really want crops up. We believe this is not what the register should be about and that it needs more active management. The ability to make direct offers after bidding rounds will enable this intervention to take place and is administratively easier and quicker. The end result is the same i.e. that 'hard to let' properties are let but with the advantage it is to people in need.

Recommendation:

Change the Available Now approach from being only applicable to homeless households and then open to public 'non register bidding' to one that will be based upon direct lets to non bidders on the register.

Noted - we have worked with staff to make this part of the policy much clearer and together we have developed a good process for capturing applicants data so it can be used in the available now window. The new policy sets this out.

Banding of workers and non workers

The policy says that all workers in each respective band will be shortlisted above all non workers in each respective band. This in effect gives rise to four bands as follows:

- Band 1 (workers)
- Band 1A (non workers) could be called band 2
- Band 2 (workers) could be called band 3
- Band 2A (non workers) could be called band 4

Notwithstanding previous recommendations should the scheme proceed on the basis of prioritising workers over non-workers, in terms of administering the scheme it will be easier technically to denote each group as a separate band to aid the short listing process. It will also be easier for applicants to understand the process.

Although there will still be four numbered bands the register will be quite different from the existing one in that some adequately housed groups e.g. non workers and tenants will be excluded and composite needs will also have disappeared.

By having four distinct bands the appearance of a waiting list is also reduced and idea that different needs have greater priority is recognised easier.

Recommendation: Split the proposed two bands into four bands to enable clear distinction between workers and non-workers.

This proposal would not have an impact upon who is successful in getting a property, and in order to ensure a simple and transparent Policy the Council feels that a two band system meets its objectives, and the needs of applicants.