

Report on the outcome of consultation: Housing Strategy 2012/15, Tenancy Strategy, Tenancy Policy and Housing Allocations Policy

Introduction

1 In January 2013 Cabinet approved the drafts of the Housing Strategy, Tenancy Strategy, Tenancy Policy and the Allocations Policy Review for consultation with stakeholders. The consultation period ran for eight weeks from 4 February to 2 April 2013.

This appendix summarises:

- The key proposals from the documents
- Feedback from the consultation process
- Changes to the documents proposed after consultation.

Methods of consultation

2 This summary presents the views of 404 residents and service users and of a number of organisations and groups. Several methods of consultation were employed to reach statutory consultees, residents and stakeholder organisations. The Localism Act 2011 required the Council to send a copy of the Tenancy Strategy to private registered providers of social housing in the borough, giving them an opportunity to comment. Registered providers had been involved, at a consultative workshop in October 2012, in shaping the content of the Tenancy Strategy. The Council also sent a copy of the Tenancy Strategy to the Mayor of London for his comments

3 The four documents were made available to the general public on the Council's web site in week commencing 4 March. Anyone wishing to respond to the consultation was invited to complete an on line survey form, send in a response to the Customer Engagement Team's postal or email address or call to make a telephone response. Invitations to respond to the consultation were sent to over 200 partner organisations, voluntary groups, BME representative groups, developers, health professionals, local authorities and tenants and residents associations. (See Annex A for a full list)

4 A message was placed on the Locata website inviting bidders for social housing from the Council's housing register to respond to the public consultation. Members of the public, including those approaching the Council for housing assistance, were interviewed in person at three locations in the borough. Copies of the documents were made available at the Civic Centre and at Libraries. The documents were presented and discussed at a number of meetings with stakeholder organisations, Council tenants, partners, residents associations and staff.

5 A survey was promoted to over 1,700 residents on the Customer Engagement team's mailing list, and to the Tenants and Residents groups on

council-owned estates. Some face-to-face interviews were also conducted at local libraries.

6 Overall, there were 404 complete responses to the consultation, of which:

- 373 were completed online and 31 were completed via face-to-face interviews.
- 52 (13%) of respondents are tenants of Registered Social Landlords (RSLs) – they rent their homes from either the council (8%) or a housing association (4%).
- 309 (76%) are owner occupiers – they own their home either outright (47%) or are buying on a mortgage (29%).
- 34 (8%) are on the housing register.

Programme of consultation 4 February to 2 April 2013

Week	Consultation activity
W/c 4 Feb 13	Documents available for comment on the Council's web site. Copies available from the Civic Centre and libraries.
W/c 4 Feb 13	Copies of documents sent to The Mayor of London and social housing providers
W/c 11 Feb 13	Invitations to comment sent to over 200 partner organisations, voluntary groups, BME groups, care homes, churches, housing developers, health professionals, neighbouring local authorities, schools, service users and tenant and residents associations. (See Annex A for details) Comments made on line, via email or written submission or by telephone.
W/c 11 Feb 13 to 18 Mar 13	Meetings where views on the documents were sought: Hillingdon Voluntary Services Health and Social Care Forum Hillingdon Wellbeing Board Management Group Private Sector Landlords Forum Hillingdon Alliance of Residents Associations Hillingdon Housing Services Senate Carers Strategy Group Disabilities Assembly Older Peoples Assembly Steering Group Older People's Assembly Hillingdon Disabled Tenants and Residents Group Social Services, Health and Housing Policy Overview Committee Housing Support Services Client Forum Social Care Staff Housing Options Staff

W/c 11 Feb 13	Invitations to comment sent to Council staff
W/c 25 Feb 13	Comments invited from housing register users of Locata.
W/c 11 Mar 13	Survey forms sent to 1800 residents
W/c 18 Mar 13	Personal interviews with residents and service users.

7 For each of the four strategy and policy documents this report provides the following:

- A brief reminder of the key proposals
- A summary of the results of the consultation process, including comments made
- Proposed amendments made to the document as a result of the consultation

Outcomes of consultation

8 The responses recorded under this heading for the four documents report views expressed during the consultation. Officer comment has been avoided in reporting results,

Housing Strategy

Housing Strategy - key proposals

9 The Housing Strategy contains a number of proposals to deliver future housing services which are aligned with the Council's strategic priorities and the national housing agenda. They are:

Homelessness prevention - There will be more advice and support for people needing help with their housing problems including residents whose housing benefit payments will fall as a result of planned Government changes.

Homelessness duty - The Council is investigating how good quality private rented housing can be secured for households to whom we have accepted a housing duty. Currently, such households are able to refuse suitable accommodation in the private rented sector that is offered as a settled home. New legislation means that the Council is able to discharge the duty with offers of suitable accommodation in the private rented sector, without requiring the applicant's agreement.

Allocation of social housing - The allocations policy review explores whether some non-priority households should be able to apply for housing. Access may be increased for some local preference groups. The aim will be to focus future effort on those in greatest housing need and ensure that residents are fully aware of the likelihood of being rehoused.

New housing provision - A minimum provision of 5,475 additional homes is planned until 2026, based on known sites coming forward to be developed. Affordable housing should reflect the need for family sized homes. High quality design is a priority for housing in all tenures.

Flexible social housing tenancies - The Council's Tenancy Strategy sets out how the flexibilities in the Localism Act 2011 will be used in Hillingdon. It will be possible to move away from long term secure and assured tenancies and ensure that social housing is available to people for as long as this is required which may be for shorter periods

Energy efficiency - The Council will continue the very successful strategy to access resources for energy efficiency work. This includes assessing how local residents and landlords can best be supported to benefit from the Government's Green Deal when it is fully introduced.

Council housing stock condition - The Council's Asset Management Strategy, determining how future investment in Council housing is made, will focus on maintaining the Decent Homes standard, supporting independence at home for older and vulnerable residents, energy efficiency measures and improving estates and shared spaces.

Mobility and choice - The Council will continue the mobility schemes enabling existing Council tenants to move to more appropriate accommodation within Council owned stock or the social rented sector. The Council will take part in the Mayor's pan London mobility scheme which prioritises under occupiers and helps social tenants to move in order to find employment.

Supported housing - The Council is considering plans to deliver (in partnership with registered providers) a programme of supported accommodation over the next three years to meet identified need. The Council's first two social rented extra care schemes together provide 95 extra care places for older people, including people with learning or physical disabilities.

Housing Strategy - outcome of consultation

10 Responses to the online consultation were largely in favour of the measures outlined to manage demand, supply and support. Measures with the highest degree of support were:

- Reviewing the allocation policy to ensure that we allocate housing fairly and transparently (88%)
- Work with housing associations and developers to deliver new homes, including affordable homes (88%)
- Plan the redevelopment of RAF Uxbridge to include over 1,200 additional homes to be built before 2019.
- Use HCA funding allocation to bring empty property back into use as affordable housing (75%)

11 In discussion at the stakeholder meetings which took place during the consultation, the following points were made:

- The disparity between how many dwellings are shown to be needed [by the Housing Market Assessment] and the *minimum* number that will be provided on sites identified for residential development needs to be expanded upon and clarified in the final version of the strategy to prevent confusion.
- Support was given to the proposal to lobby government to enable greater freedom in the use of the Housing Revenue Account.
- A request was made to address the housing issues relating to older home owners and children leaving care
- A general point was made about the cost to the Council of temporary accommodation. The Council was asked to purchase more properties as this would save money compared with leasing them.
- The Council was asked to ensure the continued provision of care and support for vulnerable people e.g. people with a learning disability or who are frail elderly who are faced with payment of housing benefit to them in future rather than direct to the landlord.

Other comments received on Hillingdon's Housing Strategy 2012-15, Tenancy Strategy, Tenancy Policy and Review of the Housing Allocation Policy

12 A written submission was received from Labour Councillors and made the following major points.

13 The Labour Group does not agree with the Council discharging its duty to re-house into the private sector whilst only retaining a duty of care for 2 years and are concerned about proposals to procure housing outside the borough, away from support networks.

14 Labour Councillors also oppose on grounds of affordability the introduction of the Affordable Rent programme which defines affordable housing at 80% of market rents, noting that the original proposal was to set at between 65% and 80% of market rents. They would want to see no more than 35% of household income spent on rent. The Labour Group does not agree with the abandonment of lifetime tenancies, specifically not for the proposed five year length. A ten year rolling tenancy is suggested as the minimum.

15 Other comments made by the Labour Group include the following:

- An increase in truly affordable housing is supported but the figures for the gross housing requirement identified and the lower figures for housing which can be built on identified sites appear not to agree.
- The proposed 10 year continuous local residency criterion for access to the housing register could be at odds with equalities legislation and, where asylum seekers are concerned, in breach of the Geneva

Convention. The general fairness of allocating social housing other than by need is questioned.

- The Labour Group supports the proposal to lobby government to remove the borrowing cap from the HRA, so that more money is raised to provide more affordable homes.
- The changes to the right of succession are not supported.
- The omission of social housing tenancy exemption for carers is not supported.
- The Council should create a properly monitored register of private landlords as one of the ways to protect households increasingly living in private rather than social rented accommodation.
- The Council should run a lettings scheme to match households on waiting lists with private landlords.

Proposed amendments to the Housing Strategy

16 This section presents the amendments to the Housing Strategy which are proposed as a result of consultation:

17 Text has been inserted to explain the disparity between how many dwellings are shown to be needed (by the Housing Market Assessment) and the minimum number that are planned on sites identified for residential development.

Tenancy Strategy

18 Before the Localism Act, social landlords were normally only able to grant long term secure and assured tenancies. Provisions in the Localism Act allow for more flexible arrangements for people entering social housing in future.

Tenancy Strategy - key proposals

19 The Tenancy Strategy proposes tenancies for a fixed length of time with the expectation that, after an introductory tenancy, five years in Hillingdon will be the norm but with a minimum period of two years in exceptional circumstances.

20 The strategy proposes the following as exceptions to the five year norm:

- **Lifetime tenancies** for older people in sheltered and extra care schemes
- **Two year tenancies** where fostering or adoption is the main reason for tenancy allocation
- **Two year tenancies** where this will enable an individual to work to gain greater independence e.g. some specialist housing schemes for care leavers
- And for individuals in supported housing, shorter tenancies to enable them to move on at the appropriate time, enabling **a more tailor made**

approach to suit the individual concerned. Tenancies could be from six months to two years or longer

21 At the end of the fixed term, the household's circumstances will be reviewed and if the household still needs the accommodation, the tenancy can be renewed.

22 The strategy also sets out the Council's position on Affordable Rent, introduced by the Government as a means of funding future affordable housing. The average household income used is £35,000 - this is the income level proposed by the Universal Credit cap being introduced in 2013. The majority of homeless households for which the Council accepts a duty are dependent solely on income from benefits.

23 No more than 40% of income should be spent on housing costs. In this case if housing providers set rents at 80% of average market rents only one or two bedroom homes are affordable. If rents are set at 67% of average market rents, three bedroom homes are affordable but four bedroom homes are not. The Council wishes to see homes with three bedrooms or more developed at 55-60% of market rent.

24 Registered social housing providers (including the Council in its landlord role) must publish a tenancy *policy* before they can use flexible tenancies and in doing so should have regard to the Council's tenancy *strategy* for the Borough.

Tenancy Strategy - outcome of consultation

25 The majority of those who responded to the consultation (67%) agreed with the proposed change from a lifetime tenancy to a tenancy limited to a length of five years. Just under a quarter (23%) disagree and 10% are not sure.

Of those agreeing with the proposal, the following are representative comments:

- Under the present system homes pass from present generation to next generation - even if the next generation is very well off and doesn't require housing. This system is utterly wrong.
- The housing needs of people need to be assessed continually so that those who require the space are able to get it.

Of those disagreeing with the proposal, the following are representative comments:

- I don't think tenants should have to worry about being out on the street after 5 years. Tenants are entitled to peace of mind and security. What happens after 5 years? Will they be subject to a review? I appreciate there are bad tenants who are undeserving of housing but

safeguards should be in place with those in authority making the decisions showing empathy, helpfulness and understanding. There should be no place for rigid interpretations.

- If we decide that social housing is a short term solution then people that make use of it will see it as temporary. People tend not to treat temporary accommodation in the way they would treat permanent accommodation. This may mean that we have increased maintenance costs for our housing stock as well as lack of cohesion in the local community.
- I would like all tenants to be reviewed and their tenancies increased if they or their families have not caused any trouble or antisocial problems.

26 There was very strong agreement (90%) with the proposal to retain lifetime tenancies for older people in sheltered and extra care accommodation. Only 7% disagree.

Typical comments from those in agreement were:

- It is important that our elderly citizens are looked after and comfortable in their environment for the latter years of their lives. They are not so adaptable to change and many of them are traumatised by events such as moving home.
- I disagree in principle - everyone should be regularly re-assessed as to whether they still need the benefit, but realistically that age group are unlikely to have sufficient change in circumstances to be removed from the list, so to save paperwork and the cost of reviewing, I agree with this proposal.
- It would be unfair to do otherwise

Typical comments from those who disagreed were:

- I am over 70, so it may seem strange to disagree. But it should say tenancy will continue as long as the tenant is capable of looking after themselves.
- Nothing is for life

27 There was similar strong support (80%) for varying the length of tenancy in specialist housing where, for example, people with a disability might be helped to live independently. Just 8% disagree.

Typical comments from those who agreed were:

- Providing their situation is assessed regularly
- This assessment needs to be carried out by a qualified health care professional, using a standardised, evidenced based assessment. An occupational therapist or social worker would be ideal for carrying out this assessment

- Specialist housing should be just that. If people's circumstances change, then they should be prepared to move on to make room for someone who is in greater need.

In discussion at the stakeholder meetings which took place during the consultation, the following points were made:

- There was comment and discussion regarding the affordability of the Affordable Rent product at 80% of market rent (even 65% is unaffordable in some instances)
- The various exemptions to the five year term were welcomed by stakeholders.
- The position of carers with reference to tenancy succession was raised by respondents. Comment – either elaborate on this one slightly or drop I would suggest
- There was concern about the five year tenancy length for older people in general needs housing, but acceptance that the end of the tenancy would be an opportunity to access sheltered or extra care accommodation if needed.
- Respondents made the point that in extra care accommodation, lifetime tenancies should be granted not just to older people but to younger people who are placed in extra care because they have a disability. The view was that parents and other family will want reassurance that they are permanently housed, especially if the tenant has moved into extra care from residential care.
- Respondents said that the strategy states that rents will be set at an affordable level, and that affordable means no more than 40% of income is spent on housing costs. Spending 40% of a higher income on housing costs has a significantly smaller impact than spending 40% of a lower income. The view was that a more flexible sliding scale would be more appropriate.

Proposed amendments to the Tenancy Strategy

28 This section presents the amendments to Tenancy Strategy which are proposed as a result of the consultation:

29 In extra care accommodation, lifetime tenancies will be granted not just to older people but to younger people who are placed in extra care because they have an enduring disability and were previously housed in residential care. Parents and other family will want reassurance that they are permanently housed, especially if the tenant has moved into extra care from residential care.

Tenancy Policy

30 The Tenancy Policy shows how the Council, as a registered provider of social housing, will allocate and manage social housing tenancies. The

Council's Tenancy Policy reflects the flexibilities included within the Tenancy Strategy.

Key proposals

31 Flexible (fixed term) tenancies are recommended after one year probationary tenancies. Five year tenancies are proposed as the norm, with two year and secure and assured tenancies offered for individual household and property types. If the household still needs the accommodation the presumption will be that their tenancy will be renewed.

32 Formal tenancy reviews are proposed no later than seven months before the end of the tenancy. The tenant would receive six months written notice of intention to reissue a tenancy for the household's current home or not to reissue a tenancy but to assist in finding another home before the current tenancy ends.

33 The Localism Act makes changes to the statutory right of succession for new secure and assured and fixed term tenancies starting after 1 April 2012. From the date of the Tenancy Policy's introduction, in accordance with the Act it is proposed to limit succession for new tenants to one succession which can only be taken up by the deceased tenant's spouse (husband, wife, common law partner or partner from a civil partnership). There will also be one succession for existing tenants, but this can be taken up by the broader list of family members which is currently in use in Hillingdon.

34 The Council could decide to increase the rent for a Council property to 80% of market rent, or possibly full market rent in cases where the tenant's income is higher than a threshold set by Government. The reasoning behind this is that the household could afford either to rent privately or purchase on the open market. Guidance has not yet been published but Government consultation has set the possible figure at £60,000 or above. This income threshold is included in the review of the Allocations Policy. The additional rent would be used as a contribution to the cost of new affordable homes.

Outcome of consultation

35 79% of respondents agreed that a fixed term tenancy would not be granted if a household had sufficient income or assets to meet their housing needs on the open market.

Typical comments from those who agreed were:

- Government support should be reserved for those whom it is necessary. We all have the possibility of our circumstances changing for better and for worse and should be equally concerned for the welfare of each other by ensuring the support is available when necessary.

- Only if these people can afford either mortgages or deposits for private housing renting. By making people go into private housing renting, you do not enable them to save to buy their own property.
- I think they should pay a full rate of rent if they can afford to do so.
- Access to social housing should not be available to people on income that is sufficient to support private rent or mortgage. It should be means tested and income should be regularly reported via the tax system to ensure that once income reaches a certain level tenants are supported to move to private accommodation.

Typical comments from respondents who disagreed or who were unsure :

- Social housing stock should not be sold under right to buy or any other scheme; we need to keep a level of stock that prevents local authorities paying high rent to private landlords who then make huge profit at the whole community's expense!
- Agree with fixed term tenancy and review and encouragement to buy or rent in the private sector but not with discounts for buying and further depleting the housing stock

36 75% agreed that a tenancy would not be granted if the property were larger than was needed by the household.

Typical comments from those who agreed were :

- Those who rely on social housing should not be in a roomier accommodation than those who purchase their own home and cannot afford to buy a bedroom for each occupant.
- It may not always work but as a principle it should be adopted.

Typical comments from respondents who disagreed or who were unsure:

- If people have paid their rent without any trouble for a number of years, they should not be forced to move out, just because their family has grown up. Just increase their rent a bit if necessary.
- This is more difficult to set in stone. There could be many reasons for a need for a larger property. Each case would have to be looked into on its own merits. I do not think there should be a blanket rule.

37 A very high percentage of respondents (86%) agreed with the proposal that a fixed term tenancy would not be granted if tenants had not met the standard conditions of a previous tenancy.

Typical comments from those who agreed were :

- People should understand that responsibilities go with privileges.
- Hopefully this will keep and raise standards and let people have pride where they live respecting other residents

Respondents who disagreed typically felt that there should be some lee-way:

- I think circumstances should be taken into account and help and support given to improve a situation before ending a tenancy. A set of criteria could be inserted into the tenancy agreement advising tenants what could happen if they breach this criteria. I don't think it should be one strike and out. Everything must be done in the first instance to resolve conflicts. If these have been exhausted then regrettably a tenancy could be terminated. But safeguards should be in place.

38 In discussion at the stakeholder meetings which took place during the consultation, the following points were made:

- Concern was expressed that because first succession can be between spouses following a death, some people may not realise that the only tenancy allowed has taken place and children will not succeed after a second death.
- The continuing first succession by a wider group of relatives in the case of current tenants was welcomed by respondents. They pointed out that the situation where a surviving spouse remarries and neither the new spouse nor children can succeed makes no sense in terms of the expense of making them reapply for housing or the cost of temporary accommodation if duty is accepted by the Council.
- Those attending accepted as fair that there should be an income level above which the Council may charge 80% of market rent or market rent, as long as this is set at about £60,000 or above.
- There was general acceptance that the Council and other providers must manage the scarce subsidised resource of social housing as well as possible. Accepted too was that the needs of some on the housing register may be higher than those of the children of a number of current tenants
- Interest was expressed in whether the households who would in future be charged an Affordable Rent (80% of market rent) when their income is above the designated threshold would also be charged a lower/social rent if their income falls below the threshold at a later date.
- Some respondents raised an issue regarding households in private rented accommodation that the council are paying the rent for and suggested that it would make more sense for the Council to buy these properties and pay the mortgage on them.

Proposed amendments to the Tenancy Policy

39 This section presents the amendments to the Tenancy Policy which are proposed as a result of the consultation:

40 In line with the Tenancy Strategy, the Tenancy Policy has been amended to include lifetime tenancies for those under 60 with a serious and enduring illness that were previously resident in residential care.

Allocations Policy

41 The Housing Allocations Policy has been reviewed and revised to reflect local need, giving priority to certain household groups, reflecting local need and to build more sustainable communities. The nationally recognised 'reasonable preference groups' are still at the heart of the policy. The policy aims to ensure that the scarce resources of social housing is used flexibly and not provided to those households who do not require it

Key proposals

42 The policy continues to give reasonable preference to households most in need. They are homeless or overcrowded households, households living in unsatisfactory conditions and those with medical and welfare needs

43 The council wants to operate a more focussed waiting list which is better understood by local residents. Currently anyone can join the Council's housing register – most will be classified as Band D, the lowest of four bands in terms of assessed level of housing need. The proposal is to **exclude people from the register where they have no housing need**. To do so will help to manage unrealistic expectations by people who have little or no hope of being allocated social housing. They will however receive help and advice from the Housing Options service.

44 **Ex-service personnel** – recent government guidance recommends that members of the armed forces should not be disqualified on residency grounds. The policy also recommends that further priority is given to members of the armed forces (and their families) who have continuously lived in the Borough for 10 years before signing up for the service and have not been dishonourably discharged.

45 **Rewarding those who work** – additional priority will be awarded to those in housing need and working.

46 **Introducing a residency criterion** - applicants would be required to demonstrate that they have been living in the Borough for a minimum of 10 years in order to join the housing register, regardless of their other needs.

47 **10 year continuous local residency** – Households in housing need who have lived in the Borough continuously for a minimum of ten years at the time of applying for re-housing will be awarded additional priority.

48 **Financial circumstances** – households with sufficient income or assets would be excluded from the Housing Register. This will apply to any household which owns or has an interest in a property, has a gross income above the level required for low-cost home ownership and/or has savings or assets of or above £30k. For homeless households, an affordability test will continue to be applied to ensure consistency.

49 **Other specific local priorities** – couples over 21 years who have no children and are working will be awarded additional priority.

50 **Encouraging personal responsibility** - applicants who bid for and refuse more than 3 reasonable offers within a 6 month period are suspended from bidding for a period of 6 months. It is also proposed that where homeless households in temporary accommodation do not bid over a period of time, a direct allocation can be made by the Council.

Outcome of consultation

51 Just over half (55%) of respondents agreed with the proposal that households with no priority need would no longer be able to join the housing register.

Typical comments from those respondents who agreed were:

- Seems little point in joining the register if they are having to wait 13 years for a property.
- I agree that if these people are on a list with no possibility of housing they may as well not be on it. People currently on the list should be advised of options.

Typical comments from those who disagreed or were unsure were:

- All citizens should have the right to join the housing register, especially those who were born here or who have contributed through paying tax and NI contributions providing they qualify for a suitable residency period.
- Removing them just hides the scale of the demand

52 77% of respondents agreed that households must have been resident in Hillingdon for ten years in order to join the housing register.

Typical comments from those respondents who agreed were:

- Nobody moving into the area should have more rights than those who have been members of the community for years
- I think there should be exceptions for example: How would that work if for instance an elderly person wanted to move to the area to be nearer family for support in remaining independent but were only able to afford social housing? Remaining independent would be saving state resources and giving them the support they require whilst providing a mixed and supportive community.
- This gives long term residents priority, but 5 or 7 years might be a more appropriate period.

Many of those who disagreed or were unsure thought ten years was too long, suggesting anything from one to five years as a residency criterion.

Others put forward suggestions for exceptions:

- People have little choice but to move to where the work is. In the modern era, there are few jobs that people have for 5 years. This policy reflects the world of the 1950s not the 21st century where we need a flexible workforce.
- What about individuals who have a connection with the borough e.g. born in the borough/parents still live in the borough?
- Priority professions, such as teachers, nurses, should be allowed to join the housing register if moving to Hillingdon to work in the borough.

53 There was overwhelming majority agreement (84% of respondents) with the proposal that recent former members of the armed forces should receive additional priority for social housing. 66% agreed that working households should receive additional priority, but only 41% agreed that working couples aged over 21 should do so.

The following are typical of the range of comments made:

- Everybody needs somewhere that they can call home. Some people may not be clever enough to earn a lot of money, but they still need a home. That's what social housing used to be about. We owe it to members of the armed services to look after them.
- Working couples with children should have priority over no children couples.
- Working couples over 21 with no children should have sufficient funds to rent privately.

54 The proportion of respondents who agreed with the proposal that the council would be able to house homeless households in private rented accommodation, even if the household wanted to wait for suitable social housing to become available, was 64%

Typical comments from those respondents who agreed were:

- If people are homeless they are probably jobless so they should not be able to dictate to the council their requirements. They should be grateful that the council are willing to help them. There is a fair proportion of people out there who think the council owes them a living and they do not have to pay anything for it. This causes bad feeling amongst people who are trying hard to raise families and look after themselves on a limited budget
- The council needs to only pay private landlords the same rent as council rents. Private landlords should not profit from taxpayers and those who contribute towards the local economy.

Typical comments from those who disagreed or were unsure were:

- I am uncomfortable with social engineering and breaking up support/family networks

- If homeless people are willing to wait for suitable social housing this should be allowed. They may not want to be moved outside of Hillingdon.
- These property owners could push up their rental prices forcing the private rental market higher.

55 85% of respondents agreed that households on the housing register which made bids and then refused an offer of a social rented home three times should not be allowed to bid for six months.

Typical comments from those respondents who agreed were:

- This holds up the process for others who are in genuine need. Those in need should appreciate what has been offered, rather than have the luxury of being able to pick and choose.
- I agree that 3 offers is fair and one must be suitable if not why bid on it?
- If social housing is a matter of 'need' then choice is immaterial as long as the property is of decent quality and suitable size.

Typical comments from those who disagreed or were unsure were:

- People should be removed permanently in these circumstances
- If you turn down properties you should go to the back of the queue

56 63% of respondents agreed that homeless households in temporary accommodation for longer when compared with others in the same priority and bed size can be directly allocated a settled home. Some respondents commented that the settled home should suit the family in terms of size and location:

Typical comments from those respondents who agreed were:

- Within limitation i.e. if they have school children that has to be taken into consideration
- Homeless families should be housed in the first available, suitable property, period. Need outweighs choice.

57 Among those who disagreed or were unsure, some respondents commented that this seemed unfair on those abiding by the procedure :
Typical comments from those who disagreed or were unsure were:

- If they don't bid, they are refusing to help themselves
- I agree they need to be moved from temp accommodation ASAP but if they are not willing to follow the process why should they be directly allocated in front of other households who do follow the process?

58 In discussion at the stakeholder meetings which took place during the consultation, the following points were made:

- There was concern about housing people outside the Borough. It was felt that this should be kept to a minimum and as close to Hillingdon as possible and vulnerability should be taken into account
- It was felt that allocation should be by housing need rather than local criteria
- Concerns were raised that there were legal issues relating to the 10 year residency requirement. The ten year residency rule to get on to the housing register runs the risk of challenge if adopted.
- One group was interested in plans to mitigate risk, and how proposed changes can be made in such a way that households will not have problems later and again be the Council's responsibility?. This includes those people most affected by benefit changes.

Other comments

59 A detailed response was received from the Royal British Legion on the review of the Allocations Policy. The Legion drew attention to the circumstances in which local housing authorities must not disqualify the serving or former members of the armed forces or family members on the grounds that they do not have a local connection. Hillingdon's requirement for the death of the spouse or partner to have been "wholly or partly attributable to their service" was felt to be an additional qualifier which does not comply with the relevant regulation.

60 The Legion considers the requirement for ten years residency in the borough to be high, and does not support the exclusion from additional priority of those who have been dishonourably discharged. A minimum length of service criterion is felt to be more appropriate.

61 The Legion makes a case for disregarding military compensation payments when considering financial eligibility for social housing, as is already done for the calculation of housing benefit and will apply under the rules for Universal Credit later in 2013. The case is also made for a returning injured service personnel to be given additional medical priority and allowed to join the housing register even if they retain a small financial stake in a home in which they can no longer live.

Proposed amendments to the Allocations Policy

62 This section presents the Allocations Policy which are proposed as a result of the consultation:

- Disregard military compensation when assessing the assets of former service personnel
- Add reference to assets abroad resulting in prevention to access to social housing
- Amend the reference to the use of Locata to make clear that choice based lettings will continue to be used by the Council

List of organisations invited to respond to the consultation

Organisation name

A2 Dominion
Acton Housing Association
Afghan United Community Association of London (AUCAL)
Afghan Women's Group
Age UK Hillingdon
Alzheimer's Society - Harrow & Hillingdon Branch
Anchor Trust
Angolan Civic Communities Alliance (ACCA)
ASRA
Bell Farm & Stockley Tenants & Residents Association
Bell Farm Christian Centre
Bennetts, Hawes & Kemps Residents Association
BME Forum
British Polio Fellowship
Brunel University
Catalyst Community Housing Association
Catalyst Housing Group
Central and NW London NHS Foundation Trust
Christ Church
Christ Church (Harlington)
Citizens Advice Bureau (Hillingdon & Ealing)
Citizens Advice Bureau (Ruislip)
Citizens Advice Bureau (Uxbridge)
Cobden Close Riverside Residents Association
Coldharbour Lane Baptist Church
Colham Green Residents Association
Community Cancer Centre
Connaught
Cornerstone Centre
Cowley Tenants and Residents Association
Crane Youth and Community Association
Crown Centre for the Deaf
Croyde Avenue & Cranford Drive Residents
Daryeel
Disabled Tenants & Residents Association
Disablement Association Hillingdon (DASH)
Domestic Violence Outreach Project
EACH
East Africa Community Support
East Africa Mother of London
Eastcote Conservation

Eastcote Residents Association
EDF Energy
Elderly Accommodation Counsel (EAC)
Enara Community Care
Eurosom Health Support Services
Fairview New Homes Limited
Family Mosaic
Garden City Estate Residents' Association
Gatehill Residents Association
Genesis Housing Group
George Wimpey - West London
Grange Park Baptist
Greater London Forum for the Elderly
Guinness Trust
HARA and Northwood Residents' Association
Harefield Baptist Church
Harefield Tenants and Residents Association
Harlington Hospice
Harmondsworth & Sipson Residents Association
Haydon Drive Residents Association
Hayes & District Scottish Association
Hayes Elim Christian Centre
Hayes End Methodist Church
Hayes Town Chapel (Congregational)
Highgrove Residents Association
Highpoint Village Residents Association
Hillingdon Action Group for Addiction Management (HAGAM)
Hillingdon AIDS Response Trust (HART)
Hillingdon Alliance of Residents Associations (HARA)
Hillingdon Asian Women's Communication Service (HAWCS)
Hillingdon Asian Women's Group (HAWG)
Hillingdon Assembly of Muslim Youth (HAMY)
Hillingdon Association of Council (Domestic) Leaseholders
Hillingdon Association of Voluntary Services (HAVS)
Hillingdon Autistic Care and Support (HACS)
Hillingdon Borough Central Mosque & Community Services
Hillingdon Carers
Hillingdon Chamber of Commerce
Hillingdon Chinese Community
Hillingdon Community Health Services
Hillingdon Community Health, NHS Hillingdon
Hillingdon Community Transport
Hillingdon Crossroads
Hillingdon Cruse
Hillingdon Disabled Tenants and Residents Association
Hillingdon Drug and Alcohol Service (HDAS)

Hillingdon Hindu Cultural Association
Hillingdon Hospital
Hillingdon Interfaith Network
Hillingdon Law Centre
Hillingdon LINK
Hillingdon Mind
Hillingdon MIND Asian Project
Hillingdon Muslim Council
Hillingdon Narrowboats Association
Hillingdon Park Baptist Church
Hillingdon Pentecostal Church
Hillingdon Primary Care Trust
Hillingdon Samaritans
Hillingdon Sikh Welfare Association
Hillingdon Somali Consortium
Hillingdon Women's Centre
Hindu Society (Hillingdon)
Holy Trinity Church (Northwood)
Home Group Limited
Homefarm Residents Association
Home-Start Hillingdon
Horn of Africa Youth Association (HAYA)
Ickenham Residents Association
Ickenham United Reformed Church
Immaculate Heart of Mary
Inquilab Housing Association
Islamic Cultural & Muslim Burial Society (Middx)
Islamic Education and Cultural Society Hayes
Job Centre Plus
Kingsborough Family Church
Live at Home Northwood
London and Quadrant Housing Trust
London Borough of Brent
London Borough of Ealing
London Borough of Hammersmith & Fulham
London Borough of Hammersmith & Fulham
London Borough of Harrow
London Borough of Hounslow
London Cyrenians Housing
Look Ahead Housing & Care
Majesty Christian Centre
Malayalee Association of Harefield
Management committee of Community First Responders
Mencap
Metropolitan Home Ownership
Metropolitan Housing Trust

Metropolitan Police
Middlesex Association for the Blind
Multicultural Group
Nav-Jeevan Asian Society
Navratri Garba – Adhya Shakti Mataji Temple
NHS Hillingdon
NHS London
North Uxbridge Resident Association
North Uxbridge Residents Association
Northwood & Pinner Liberal synagogue
Northwood Hills
Northwood Hills Residents Association
Northwood Methodist Church
Northwood Residents Association
Notting Hill Housing Trust
Oak Farm Residents Association
Older People's Welfare Committee
One Step at a time
Orchard & Shipman
Our Lady Of Lourdes & St Michael
P3
Pakistan Association for Culture, Knowledge & Information (PACKI)
Paradigm Housing Group
Parish of West Hayes
Places for People
Princes Park Lane Tenants & Residents Association
RAF Northolt
Ramgahria Sikh Association
Refugees in Effective & Active Partnership (REAP)
Relate & Family Mediation London Northwest
Rethink Hillingdon Carers Service
Richmond Fellowship
Royal Borough of Kensington & Chelsea
Ruislip Baptist Church
Ruislip Manor Methodist Church
Ruislip Methodist Church
Ruislip Residents Association
Sahan Society Centre Limited
Salem Baptist
Salvation Army
Sanctuary Housing Association
Service Users (Disability Steering Group)
Shepherds Bush Housing Association
Shree Kutch Leva Patel Community
Slough Council
Social Activities for multiple sclerosis (SAMs)

South Buckinghamshire Council
South Ruislip Christian Fellowship
South Ruislip Methodist Church
South Ruislip Residents Association
Southwark & London Diocesan H.A.
Spelthorne Council
St Bernadette's
St Catherine's
St Giles' Church
St Gregory The Great
St Herome
St John The Baptist
St Laurence Church
St Margaret's Church
St Martin's Church (West Drayton)
St Mary's Church (Harefield)
St Matthew's Church
St Mungos
St Raphael's Catholic Church
St Thomas More RC Church
Thames Valley Housing Association
The Abbeyfield Society
The Chimes, Capital Shopping Centres Group
The Community Voice/Ruislip Residents Association
The Crown Church
The Glebe Tenants & Residents Association
The Mall Pavilions
The One Stop Service, Sunrise Pilot and interpreting and volunteering
service (Refugee Council)
The Pension Service
The Salvation Army
The Stroke Association
Three Rivers Council
Town & Country Housing Group
Trinity Homeless Projects
United Response
Uxbridge College
Victoria Climbié Foundation
Vision and Voice
Waterloo Road Church
West Drayton Baptist Church
West London Malayalee Association
West London Sudanese Community Association
West London YMCA
West-London Somaliland Community
Womens Pioneer Housing Ltd

Yarrow Housing
Yiewsley Community Involvement Group