

**APPENDIX 1 - SHROPSHIRE AFFORDABLE HOUSING ALLOCATION POLICY AND SCHEME: CONSULTATION FEEDBACK**

1 SHROPSHIRE AFFORDABLE HOUSING ALLOCATION POLICY AND SCHEME : CONSULTATION FEEDBACK						
	Strongly Agree (SA)	Agree (A)	Neither (N)	Disagree (D)	Strongly Disagree (SD)	Comments
1	<p><b>Local Connection</b>                      The new Shropshire Affordable Housing Allocation Policy and Scheme retains an open housing register (any eligible person can put their name on the Register) but allows preference for housing to be given to people with a local connection to Shropshire.</p>					
	2			1	1	<p><b>(SA)</b> Because of mutual cross-generation support and stability (hence reducing government and family costs) : more likely to integrate and take part in the community: BUT 'other people 'necessary too: you've a difficult job to try to please everyone</p> <p><b>(D)</b> The above statement is too simplistic. The policy should be based on need irrespective of the applicant's location</p> <p><b>(SD)</b> I feel the policy should be flexible to allow specific cases to be assessed on a need by need basis eg where a family does not fit the criteria but have relocated owing to harassment, domestic violence etc</p> <p><b>Response:</b>                      The Policy refers to the ability to give preference to applicants with a local connection, it does not give priority to these applicants. Cases can be assessed individually and their full circumstances taken in to account.</p>

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2	<b>Financial Resources</b> The new Shropshire Affordable Housing Allocation Policy and Scheme targets affordable housing in Shropshire towards those households unable to afford open market housing. Reduced preference may be given to households whose income and / or capital resources exceed £63,000					
	2	1			1	<p><b>(SA)</b> This figure should be lower – it is galling to see ‘Council’ properties built with parking for <u>4</u> cars!</p> <p><b>(SA)</b> - But still look at that income ‘person/family’s’ circumstances as a balance of need : may live in an area of high cost housing and genuinely can’t afford home in the area</p> <p><b>(SD)</b> This statement is also too simplistic. You quote a figure of £63,000 but you do not know what financial commitments they have at the time of application</p> <p><b>Response:</b>            The proposal is to give ‘reduced preference’ within the same banding to applicants with resources / income exceeding £63,000. This does not exclude people and still allows assessment of individual circumstances.</p> <p>The figure of £63,000 is aligned with Planning Policy relating to financial eligibility for Single Plot developments</p>

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3	<p><b>People Under-Occupying Affordable Housing</b>            The new Shropshire Affordable Housing Allocation Policy and Scheme gives Gold Band priority to people under-occupying affordable social housing. The rules with respect to direct management lets have also been changed to allow people under-occupying social housing to be allocated a property without that property being open to bidding. The resulting vacancy will be advertised as normal for bidding.</p>					
	3	1				<p><b>(SA)</b> Agree but in exceptional circumstances this may not be an acceptable solution eg two old ladies living together and separated in properties some distance from each other; a son/daughter who helps his/her mother living next door and needs to be within reasonable distance when needing help</p> <p><b>(SA)</b> If it is what the namely only occupant wants and can afford excess payments on bedrooms: uprooting people because of the above could potentially cause psychological damage to tenant. Contact them <u>now!</u></p> <p><b>(A)</b> Social housing should be proportionate to the needs of the tenant</p> <p><b>Response:</b>            The proposals allow people to move more easily, they do not require people to do so.</p>

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4	<p><b>Properties with Disabled Adaptations</b>            The new Shropshire Affordable Housing Allocation Policy and Scheme allows landlords to give priority for adapted properties to people who need the existing adaptations, either on a long-term basis or for shorter periods, as required.</p>					
	3	1				(SA) It is surely the <u>most logical</u> (and humane) thing to do
5	<p><b>Target Allocations</b>            The new Shropshire Affordable Housing Allocation Policy and Scheme includes two additional groups for targeted allocations, where a percentage of overall allocations will be targeted towards Former Members of the British Armed Forces (5% target) and also for Community Benefit eg. key workers (5% target)</p> <p><b>Former Members of the British Armed Forces (5%)</b></p>					
	2	1		1		<p>(D) I disagree with the British Armed Forces ruling as this favours a specific group and equally, or by extension, would be seen to discriminate against other groups.</p> <p>(SA) Because: rough sleepers have a high percentage of ex-service personnel (with health issues too)</p> <p><b>Response:</b>            Shropshire Council is a signatory to the Military Covenant and as such has undertaken to endeavour to ensure former members of the British Armed Forces are not disadvantaged with respect to access to affordable housing and to ensure a reasonable supply of affordable housing is made available to them.</p>

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	<b>Community Benefit eg key workers (5%)</b>					
	1	2		1		<p><b>(SA)</b> Key workers are quite simply KEY to the area and benefit everyone</p> <p><b>(A)</b> I agree with community benefit' ruling as I can understand, and agree with, the logic / justification</p>

#### FEEDBACK FROM OPEN WORKSHOPS / CONSULTATION EVENTS

These events (2) were attended by representative from partner organisations and stakeholders. Some had carried out consultation with their own stakeholder / customer focus groups.

- **Local Connection**

- Remind people of how Shropshire is being defined (ie excludes Telford and Wrekin area) – will there be a 'blurred border' for people living within say 5 miles of the boundary?
- Provide more guidance about the employment criteria: how would seasonal workers and zero hours contracts be considered / what does casual mean?

**Response:**

- Accepted the notion 'very close proximity' to the Shropshire border – to be defined in Guidance Notes
- Guidance Notes to be prepared with respect to interpretation of this and other relevant aspects of the new Scheme

- **Financial Resources**

- This element was widely accepted, but there was a query as to whether it should be restricted to 'general needs' properties, rather than sheltered or other specialised accommodation

**Response:**

- The impact of applying this across the board will be monitored as this element does not exclude people from housing and includes a wider assessment of the ability to meet housing needs within the open market.
- **Under-Occupation.**
  - Enabling people to move more easily through direct lets / management transfers was welcomed
- **Target Allocations**
  - Some stakeholders (landlords) wanted a 'catch all' approach, to enable them to target allocations in a way they think appropriate rather than being restricted to certain groups/types. This would enable them to more easily balance meeting housing needs with meeting the needs of communities / 'place'.
  - There was some concern that targets may become problematic for sheltered housing and housing for older people and other types of housing where there is a relatively high turnover
  - An alternative model was discussed (Wrekin Housing Trust model) where there are targets for allocations but these are based on targets for different levels of need (% urgent, % needing, % wanting) rather than types of tenancy (eg transfers) or specific types of circumstances (moving on from supported housing)

**Response:**

- No change to the proposals at present but operations / impact will be monitored. The Policy /Scheme is subject to annual review and it is anticipated this aspect will develop over a period of time
- **Hard to Let and For Sale Properties**
  - The current proposal is that subject to any Planning Conditions, 4 weeks elapse from the first advertisement with Shropshire HomePoint to the landlord being able to advertise outside Shropshire HomePoint. It was proposed this be reduced to the property being advertised over two 'bidding cycles' (two weeks) before advertising elsewhere.

**Response:**

- It is assumed that accommodation is provided in recognition of housing need. There is considerable flexibility within the existing and proposed new Policy and Scheme to enable targeted advertising, open days and so on within the Shropshire HomePoint framework. The 4 week period is considered reasonable and will help to maximise the proportion of property allocated to people registered with the Shropshire Affordable Housing Register.

## FEEDBACK FROM SHROPSHIRE HOUSING GROUP : LOCAL KNOWLEDGE AND EXPERIENCE

- **One Bid Per Property Cycle**

- This may disadvantage people in priority need where a number of properties may be suitable or there could be situations where people in priority need all bid for one property and not others, so only one person is rehoused from that cycle.

**Response:**

- Maintain current approach but evaluate at annual review

- **Offers of Accommodation**

- Insert 'who have failed to make contact' about offers as well as refused offers

**Response:**

- Accepted

- **Sheltered Accommodation for Older People**

- There is a proposal to introduce landlord specific criteria to this section and also to para 3.8 of the Silver Band criteria.

- **Response:**

- The current wording is clear that some landlords may have additional criteria they wish to apply. High medical and/or support needs will be picked up elsewhere and reflected in the final banding eg high medical in Gold Band applying for sheltered housing will need the sheltered accommodation assessment, This assessment will not define their banding but will enable access to sheltered housing. Including specific landlord variations in a Countywide policy/scheme would over-complicate the scheme.

- **A move is needed to give support to... Gold Band (2.11)**

- The main recommendation and concern is regarding the new Gold Band Criterion of 'A move is needed to give support to, or receive support from, close family members and / or move closer to local facilities'. If adopted, with the current figures this would place an additional 456 into the Gold Band, as well as challenging to administer, with many applicants using this criterion to unfairly increase their banding.

- It is recommended to use instead 'A move is needed on Hardship Grounds' in line with the new Allocations Code of Guidance and use as a Silver Band Criterion.
- P.18 Remove '...' and replace on P. 21 'Applicants in or due to be...' with

- **A Move is Required on Hardship Grounds.**

This would only apply where not moving would cause physical, emotional or financial hardship, such as excessive travelling to work, further education, where there is an ongoing need to give or receive care or to access specialist medical treatment.

Travel is expected to exceed one hour each way. When required to take up or remain in employment or further education, this must be of 20 hours or more per week. This is not a definitive list and will be at the discretion of Shropshire HomePoint.

Available methods of transport and duration of journey during normal travel conditions will be taken into consideration.

Verification of the suitability of property will be confirmed at point of offer by the Landlord.

Under this heading, Silver Band is awarded by Shropshire HomePoint.

- **Response**

- The proposed rewording reflects the current Scheme which places the need to move to give and/or receive support in Silver Band, aligned with hardship caused through travel etc. The new Draft Scheme specifically seeks to separate these two elements of 'hardship', and to facilitate and support informal care and support, including support with childcare and care for older relatives. There will therefore be no change to this separation at this stage.
- There is concern that this may be difficult to administer and that applicants may attempt to manipulate their banding. Placing this criteria in Gold Band or reducing it to Silver Band does not increase or decrease administration or the need for applicants to provide robust evidence of this need.



- **P. 16 Insert new Gold Band Criterion after ‘Moving to Independent Living’ criterion.**
  - **Verified Complex Sheltered Need** This applies where the current accommodation is unsuitable and there is a complex range of support needs requiring intensive and regular support to enable independent living. An assessment carried out by the Sustain Consortium and confirmation of eligibility is required before bids will be accepted. Under this heading, Gold Band is awarded by Shropshire HomePoint.
  
- **P. 19 Insert new Silver Band Criterion after ‘Relationship Breakdown’ criterion.**
  - **Verified Sheltered Need** This applies where the current accommodation is unsuitable and there is a need for ‘overseeing support’ to enable independent living. An assessment carried out by the Sustain Consortium and confirmation of eligibility is required before bids will be accepted. Under this heading, Silver Band is awarded by Shropshire HomePoint.
  
- **Response**
  - This would reflect a move where more supported housing / living arrangements are required. This is worthy of consideration but may need careful evaluation. The current proposal restricted to sheltered housing and assessments undertaken by one named housing support consortium. This is too narrow for a Countywide scheme, however does represent an area for further work and possible inclusion in the next annual review of the Scheme.

## **FEEDBACK FROM SHROPSHIRE COUNCIL: PRIVATE SECTOR HOUSING**

- **Gold Band Awarded on the basis of Cat 1 Hazards**

- The current approach to class all Category 1 (Cat 1) hazards equally resulting in the award of Gold Band is too general. The HHSRS provides a means of assessing dwellings which reflect the risk of any hazard and allows a judgement to be made whether that risk is acceptable or not. It is important to consider that some deficiencies may be easily, quickly and cheaply remedied, but while such deficiencies are present, the threat to health or safety can be considerable. Consideration should therefore be given to revising the system to separate the dwellings with the more serious Cat 1 hazards under the rating system from the less persistent Cat1 hazards. Many of these latter hazards are remedied by the landlord and the housing needs assessment system should reflect that the hazard has now been dealt with, rather than leaving the applicant in Gold Band on the basis of hazards which no longer exist
- It is suggested that the addition of statutory overcrowding should be included in the bedroom entitlement in the award of Gold Band
- Amended wording will be proposed.

**Response:**

- Accepted. A mechanism will be put in place to review property condition to identify where remedial action has been taken

### **ADDITIONAL CONSULTATION PERIOD**

During the additional two week consultation period one direct response and four on-line responses have been received. The direct response suggested that child protection be added to the allocation criteria. This has been considered but the view taken that as assessment is on a case by case basis this would be unnecessary. Of the on-line feedback received, the four responses either agreed or strongly agreed to all proposed changes to the original draft policy with particular support for the 5% target for former members of the British Armed Forces.