

NOTTINGHAM CITY HOMES

REPORT OF DIRECTOR OF HOUSING OPERATIONS

BOARD
17 May 2007

LETTINGS PLAN 2007/08 AND RESPONSE TO CLG CONSULTATION PAPER ON ALLOCATIONS

1 SUMMARY

- 1.1 The Lettings Plan sets out the way vacant properties will be allocated during 2007 / 08 to meet housing need and to balance the competing priorities of applicants on the Housing Register.

The report also contains Nottingham's response to the Communities and Local Government's Consultation Paper "Allocation of Accommodation: Choice-Based Lettings – Code of Guidance for Local Housing Authorities" and summarises its implications for Nottingham City Homes.

2 RECOMMENDATIONS

- 2.1 That the Board approve the Lettings Plan contained at Appendix A.
- 2.2 That the Board note the response to the CLG Consultation Paper at Appendix B.

3 REPORT

- 3.1 During 2006/07, 3,000 lettings were made to applicants on the Nottingham Homelink housing register. There are 14,000 applicants on the register, categorised into six Bands of housing need. There is a statutory responsibility to ensure that reasonable preference is given to homeless people and those in urgent housing need.
- 3.2 Nottingham's allocations policy has used a quota system to ensure that applicants in higher priority bands are given preference. In 2006/07, the quota targets were set at a simple uniform 25% across the top 4 bands. Due to the smaller number of applicants in Band 1 (statutory homeless) and Band 2 (urgent need), this should have meant these applicants were housed more quickly. However, although vacant properties were advertised in line with the quota targets, this did not result in the desired distribution of lettings across the priority Bands.
- 3.3 To understand the reasons for this, a more detailed analysis of lettings outcomes has been carried out. The results have informed the Lettings Plan for 2007/08 at Appendix A. The Plan contains proposals for quota targets in relation to priority Bands and property size. It also explains the approach to diversity issues, arrangements for decommissioning schemes, temporary accommodation, the low demand register and local lettings policies.

- 3.4 The Plan has been drafted by NCH officers in conjunction with the NCC officers in Strategy and Housing Aid. Initial consultation with partner RSLs and tenants on the Homelink Steering Group has been favourable. However, more consultation is planned once the Board has approved the Plan.
- 3.5 Lettings outcomes will be monitored on a monthly basis and a full review exercise carried out in six months. The results will be reported to the Performance and Improvement Committee on Tenancy and Estate Management Forum. The results and subsequent consultation, together with an Equalities Impact Assessment of allocations, will form the basis for the formulation of the Lettings Plan for 2008/09.
- 3.6 In summary, the Lettings Plan proposes:-
- Changes in the quota targets to ensure 25% of vacant properties are allocated to homeless households and 30% to applicants in the most urgent housing need
 - Band 4 to receive a higher proportion of one bedroom properties within the quota to reflect the number of single households in that Band
 - Analysis of lettings to BME groups during 2007 to inform local targets in 2008
 - A reduction in the use of temporary accommodation with a view to ceasing the current arrangements.
 - A reduction in the proportion of stock covered by local lettings policies.
- 3.7 The CLG's consultation paper was issued in January 2007. A joint response has been submitted by Nottingham City Council on behalf of all partners in Nottingham Homelink. The full response is attached at Appendix B. Overall the response welcomes the general principles embodied in the Code, particularly in relation to clarifying ways of balancing choice and housing need., However, some aspects are over-prescriptive and may compromise the flexibility of CBL schemes to respond to local circumstances.
- 3.8 The key issues for Nottingham's policy and Homelink scheme are summarised below:-

Issue	CLG recommendation	Nottingham's view/comments
Supported/ specialist housing and choice based lettings	Include supported and specialist housing in CBL	Supported housing is scarce, reliant on formal referral mechanisms and needs to be carefully matched to meet the needs of the user. We include sheltered and adapted accommodation within CBL. But highly adapted properties should be matched to specific

		applicants if possible.
Bids per applicant per advertising cycle	Do not limit the number of bids per cycle because it narrows choice	We limit the number of bids to 3 per week which can be changed at any time in the bidding cycle. Limiting the number of bids leads to more thoughtful bidding, is more manageable and makes bidding feedback to customers more meaningful. It is also less likely to lead to refusal of offers.
“Backdating” of applications, ie when time waited on the list is used to separate applicants within the same priority band, and the scheme gives <i>additional</i> waiting time in recognition of specific housing needs factors	“Backdating” is not recommended because it is confusing and makes feedback information on previous lets “inherently unreliable”	Nottingham uses this approach and would argue that as long as customers can compare like with like in terms of their position in relation to other applicants it <u>is</u> reliable. The technique is explained in Plain English in the HomeLink user guide and has received no negative comment from customers.
Local connection	The code suggests that people without a local connection should be assessed for reasonable preference (RP) and should be given priority after those with RP and a local connection but ahead of those in non-RP categories with a local connection	Local members were very clear about their desire to see a robust but fair local connection policy in the City’s allocations scheme. The CLG draft guidance would wholly undermine our approach. Below the RP categories there are still a number of applicants with a significant level of housing need, who, under the CLG guidance would be by-passed in favour of higher needs applicants from outside the City. Whilst social rented housing stocks remain either static or reducing this seems unacceptable. We are aware of the Government’s desire to see greater economic and geographic mobility within social housing (as seen in

		<p>the Hills report), but using guidance on allocations schemes such as this is not the way to achieve it.</p> <p>All of our housing association partners within Homelink re-house people from outside the City, and we achieve a limited level of inward mobility this way.</p>
Nominations to housing associations within a CBL environment	The guidance advises retention of nomination arrangements	<p>We believe that HomeLink, with its common allocations policy rids us of the need for formal nomination arrangements. We measure housing association performance in addressing housing need by monitoring the number of lettings to high-banded applicants on the housing register.</p>

4 OTHER OPTIONS

- 4.1 Within the Lettings Plan, the simple quota targets could have been extended for a second year. This would have enabled the impact of choice based lettings on the targets to be assessed for a full year. It was not considered appropriate to delay changes given that the emergent trends have been consistent over the last few months.

5 FINANCIAL & RISK IMPLICATIONS

- 5.1 There are no additional costs incurred by the implementation of the Lettings Plan. Savings delivered by the review of the provision of temporary accommodation will be considered separately.

6 IMPLICATIONS FOR NOTTINGHAM CITY HOMES OBJECTIVES

- 6.1 The aims of the Lettings Plan are to
- ensure the outcomes of the choice based lettings demonstrates that reasonable preference is given to those in priority need
 - ensure best use is made of our housing stock
 - ensure vulnerable groups are accessing the scheme
- All the above support the delivery of a high quality, customer focussed management service, and the achievement of sustainable tenancies and consequently, decent neighbourhoods.

7 VALUE FOR MONEY & EFFICIENCY ISSUES

- 7.1 Ensuring applicants in the greatest housing need are housed quickly will reduce the periods of time spent in temporary accommodation. Aligning

the proportion of vacant one-bedroom properties to the number of single households in each Band will help reduce the potential number of refusals and/or properties with no bids. Both factors will reduce rent loss on vacant properties and improve service delivery to the customer.

8 EQUALITY & DIVERSITY IMPLICATIONS

- 8.1 The Lettings Plan sets out the general approach to diversity with the analysis showing that the proportion of lettings to BME applicants slightly exceeds the proportion on the housing register. It acknowledges the further detailed work required to devise local targets and interventions for specific BME groups.

9 BACKGROUND MATERIAL AND PUBLISHED DOCUMENTS REFERRED TO IN COMPILING THIS REPORT

- 9.1 "Allocation of Accommodation: Choice Based Lettings" Code of Guidance for Local Housing Authorities Communities and Local Government

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Nottingham City Homes' Draft Lettings Plan 2007/08

A. AIMS AND OBJECTIVES

The key aims of the allocations policy are to meet housing needs, maximise choice, improve access to housing for vulnerable people and to ensure allocations contribute towards the sustainability of neighbourhoods whilst making best use of the housing stock.

The policy is designed to be as simple and transparent as possible whilst still addressing multiple needs.

The policy sets out the way applicants will be prioritised into one of 6 bands according to the degree of housing need. Waiting time in need will subsequently order applicants within these bands.

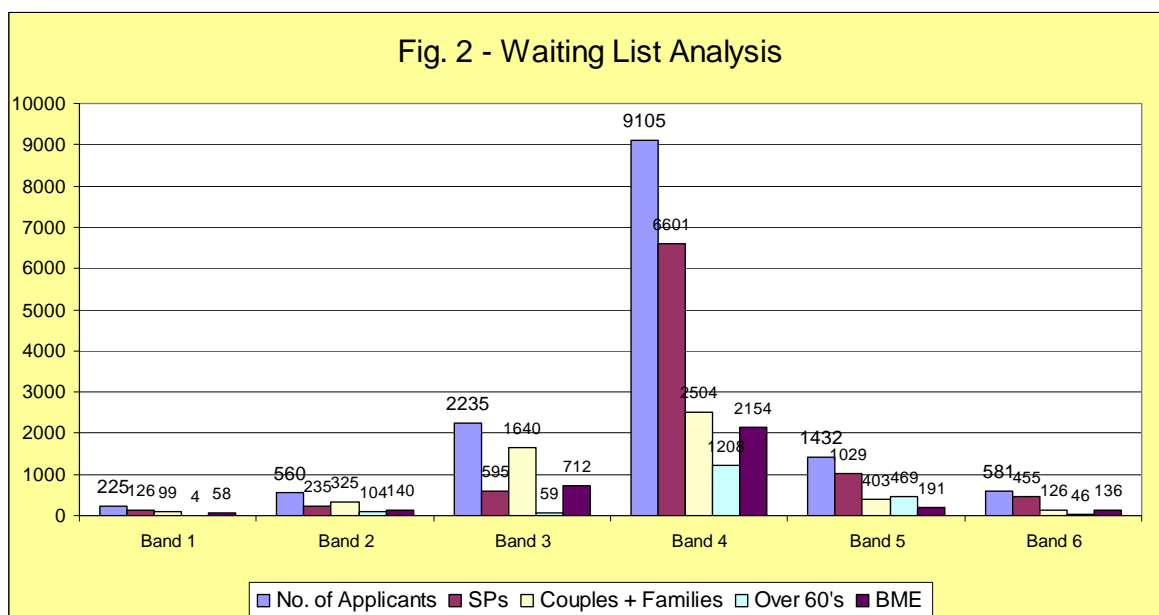
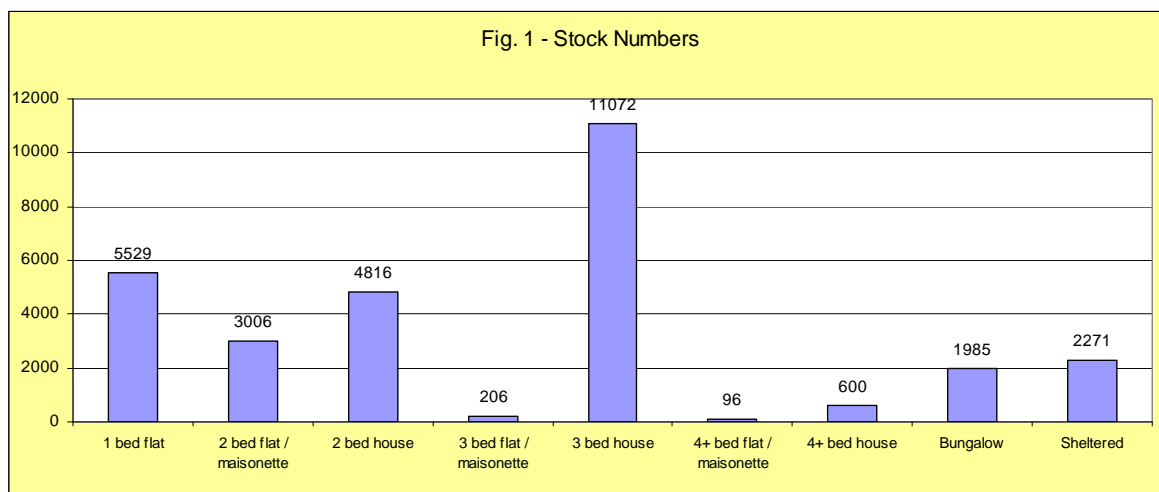
The aim of the Lettings Plan is to

- ensure the outcomes of the choice based lettings demonstrates that reasonable preference is given to those in priority need
- ensure best use is made of our housing stock
- ensure vulnerable groups are accessing the scheme

B. BACKGROUND INFORMATION

Nottingham City Homes currently manages a stock of 29,851 properties of which 40% have 3 or more bedrooms. **Figure 1** shows the breakdown of stock into property type and size. The housing waiting list contains 14,138 applicants. **Figure 2** shows the breakdown of the waiting list into household size and priority Bands. Only 6% of applicants fall into the Statutory homeless (Band 1) or Urgent need (Band 2) categories. 64% are in the low need (Band 4) category of which over two thirds are single person households. 24% are applicants from BME groups.

In the 12 months up to March 2007, Nottingham City Homes rehoused 2946 applicants.



The Quota system

The Best Value Review of Allocations in 2004 recommended that the quota system in operation at the time be continued. The quota system provided for a random selection of vacant properties to be offered across all Bands in line with annual targets. This was to enable a reasonable number of lettings to be made to all Bands of priority and for applicants from any one of the Bands to gain access to housing in the most popular locations.

The current quota system provides for 25% of all vacant properties to be offered to each of the Bands 1 to 4. Bands 5 and 6 only receive offers where there are no suitable bidders in Bands 1 to 4. In addition, sheltered properties and properties which are being advertised for the second time are advertised as "Any Band".

There is no distinction made within the quota system for tenure or ethnic group of applicant or variation according to property type. The allocation of properties is based on housing need irrespective of whether the applicant is already a council tenant, housing association tenant or private tenant. To some extent this was deliberate as part of the move to simplify the system

and to raise levels of transparency. The large numbers of vacant properties available in Nottingham enable a more general approach not afforded to those authorities with higher pressures on stock.

The policy provides for a small proportion of properties to be let outside of the choice based lettings scheme to enable responses to exceptional need by making manual offers or to better match particular properties to applicants with individual needs. The current target for properties let in this way is 5%.

C. ANALYSIS OF LETTINGS OUTCOMES JUNE 2006 TO FEBRUARY 2007

To understand whether the aims and objectives of the policy are being met through the choice based lettings scheme and the application of the quota system we need to analyse the outcomes of lettings over a period. The data in **Figure 3** relates to lettings made between June 2006 (when choice based lettings commenced) and February 2007. It shows that

In general, the higher the degree of housing need, the quicker applicants will be rehoused on average. Homeless applicants wait on average 75 days to be rehoused whereas applicants in Band 4 wait on average 10 times longer. There is only a small difference between Bands 2 (541 days) and Band 3 (590 days).

Comparing the number of applicants in each band to allocations made to each band (Figures 2 and 4) produces the following ratios:-

Band 1 0.5 applicants for each vacant property

Band 2 1.2 applicants for each vacant property

Band 3 4 applicants for each vacant property

Band 4 7 applicants for each vacant property

Our conclusion is that the system is ensuring that those with higher housing need are prioritised but that a greater supply of properties should be made available to Band 2 to reduce waiting time in that Band.

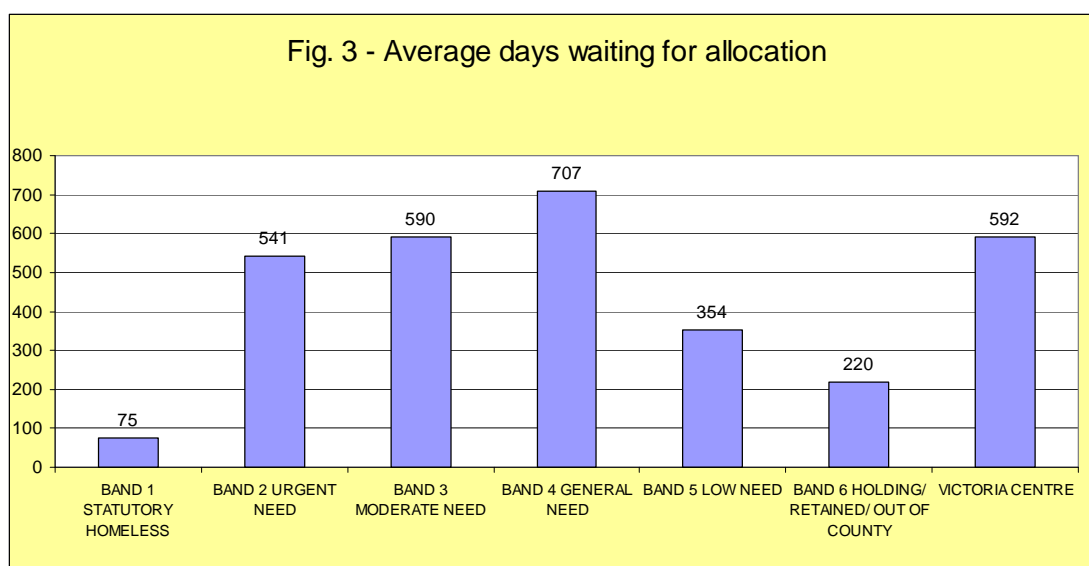


Figure 4 shows the proportion of vacant properties allocated across the Bands in this time period. It shows that

Although vacant properties are advertised according to the 25% each band quota system, the resultant lettings vary significantly from this except for Band 3. Only 17% of lettings go to homeless applicants in Band 1, 15% to Band 2 and 42% to band 4. 31% of properties are advertised as “Any Band” properties and this skews the figures.

Our conclusion is that in order to achieve quota targets a greater proportion of properties should be advertised to Bands 1 and 2 and a lower proportion to Band 4.

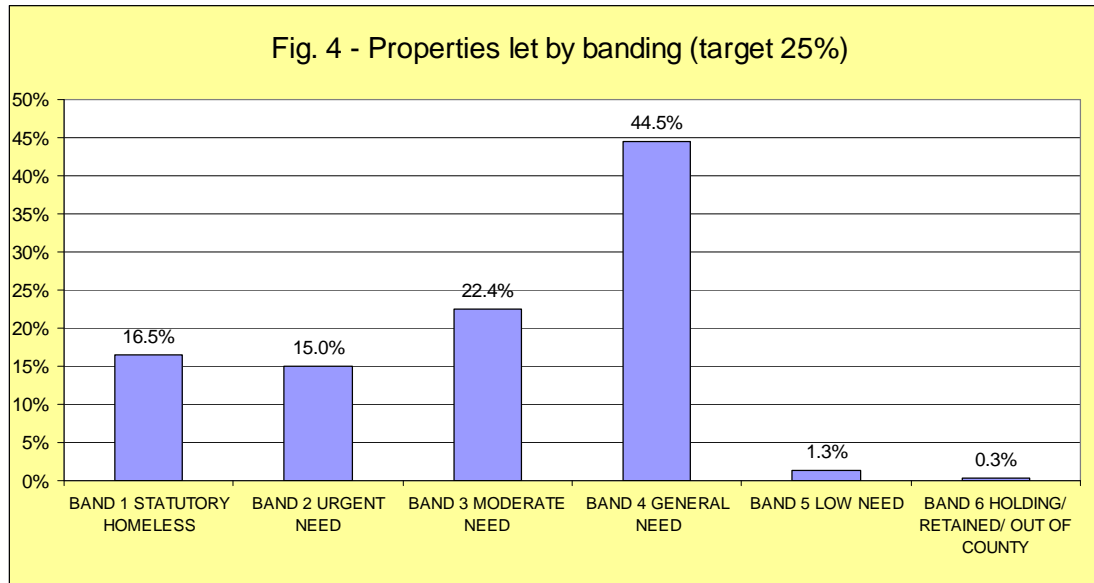


Figure 5 (TableC) shows the type and size of properties becoming available for letting between June 2006 and February 2007 and to which Band they were allocated. When considered alongside the data in Figure 2, the breakdown of the waiting list, it shows that

44% of available properties had one bedroom and most of these were let to single person households in Band 4. Conversely families in Bands 1 and 2 receive 53% of 3 bedroomed properties that become available.

Our conclusion is that property types allocated across quotas generally match relative demand from households within each Band.

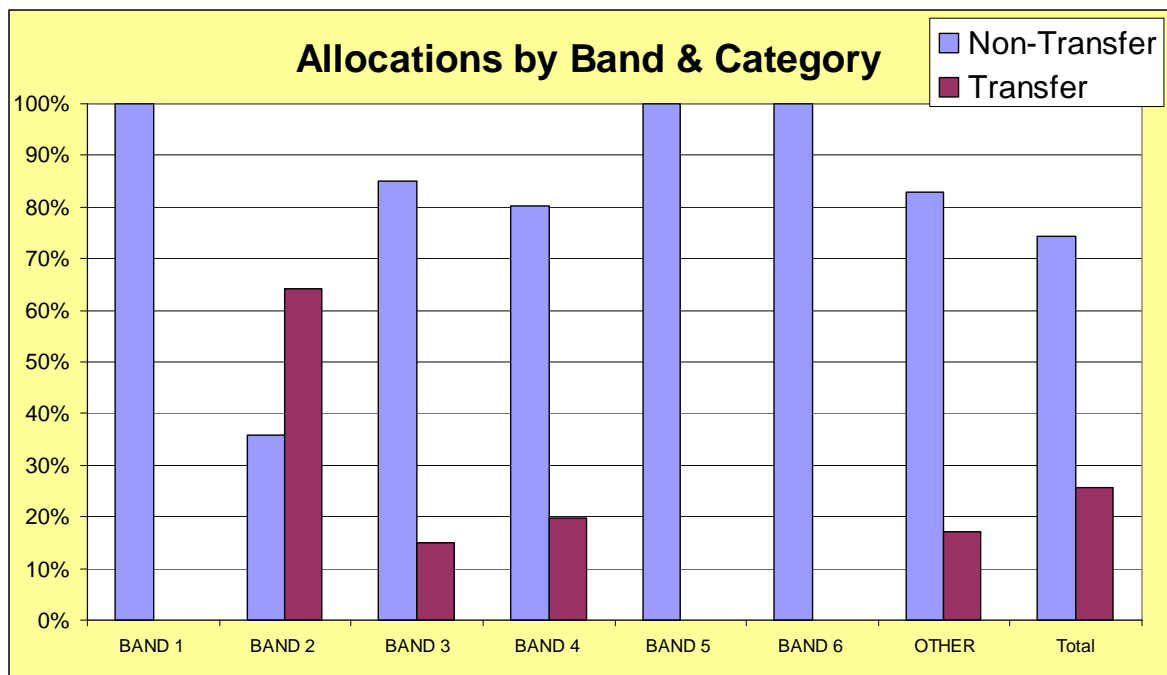
Table C - Allocations Feb 06 - Feb 07

	Band 1		Band 2		Band 3		Band 4		Total
	SP	FAM	SP	FAM	SP	FAM	SP	FAM	
1 bed flat	80		59		253		676	1	1069
2 bed flat / maisonette	42	14	37	3	90	17	186	4	393
2 bed house	68	137	14	31	5	98	33	55	441
3 bed flat / maisonette	4	1	1		3	4	9	1	23
3 bed house	21	191	16	144	7	135	26	74	614
4+ bed flat / maisonette				1	4	2	19	1	27
4+ bed house		6		12		7		6	31
Bungalow	5	2	91	6	7		23		134
Sheltered			43		12		169		224
Total	220	351	261	197	381	263	1141	142	2956

Figure 6 shows the proportion of properties allocated within each Band to transfer applicants. It shows that

Overall 26% of allocations went to transfer applicants and 74% to waiting list applicants. The highest proportion of transfers went to Band 2 applicants (68%) reflecting the categories of management transfers and medical needs within that Band.

Our conclusion is that the demand for transfers within council accommodation for those in urgent need is being met and the turnover within other Bands is enabling choice for existing council tenants. Transfers can be strictly controlled by tenancy checks and compulsory pre-transfer visits to ensure properties are left in a satisfactory condition before termination.



Mutual exchanges

Demand for transfers is partly met through existing council tenants doing a mutual exchange. This is arranged through tenants advertising their properties and finding a potential exchange partner. The exchange is subject to normal tenancy and eligibility checks. This is a cheaper method of transfer as it avoids any rent loss or costs associated with managing the void. In October 2006 an internet based database was introduced for use by council tenants. This has increased the number of mutual exchanges by 36%, from 277 in 2005/06 to 377 in 2006/07. RSL partners will join the database in 2007/08.

Diversity issues

Analysis of ethnicity of new tenants shows that 28% of lettings city wide are made to applicants from BME groups. This figure has been fairly consistent since 2004. This compares favourably with the BME profile on the waiting list which shows 24% are from BME groups. However, analysis of bidding patterns shows that 34% of bidders are BME but they are securing a smaller proportion of lettings. We also know that there are large geographical variations in allocations and residency of applicants.

Analysis of disability levels amongst applicants shows 3.1% have declared a disability. Lettings to disabled applicants in 2007/08 stand at 2.7% with increasing figures since September 2006. However, it is too early to draw conclusions on the basis of this data as disability has only recently been actively recorded. The accuracy of the data in relation to historic figures needs to be tested and bidding patterns and outcomes analysed to inform planned actions.

Sheltered housing

The falling demand for sheltered housing is a major issue for Nottingham City Homes. There are 2,271 sheltered units and the turnover during 2006/07 was 11.3%. Although we allocated 268 sheltered properties during this period, there are still currently 103 voids, some of which have been void for lengthy periods. An ongoing focussed marketing strategy, including a series of open days, has had some success in letting longer term voids so the picture is healthier than pre-Choice Based Lettings. Several schemes have been decommissioned in recent years mainly in the North of the City. The decommissioning of a further scheme, Camrose Close, is scheduled for 2007/08 and it is expected others will be identified by the Sheltered Housing Strategy under preparation.

D. PROPOSALS FOR 2007/08

1. Quota targets

We recommend the following annual targets:-

- Band 1 25%
- Band 2 30%
- Band 3 25%
- Band 4 20%

For Band 1 we will agree the specific quota requirements with Housing Aid on a monthly basis for each 4 week period. For Band 2, we will adjust the monthly quota to reflect the needs of tenants in decommissioning schemes in agreement with the Regeneration Team.

However, to achieve these targets we will need to advertise a greater proportion of vacant properties to Band 2 & 3. This is because of the inbuilt bias towards Band 4 as a result of the larger numbers of flats and sheltered units vacant.

The suggested advertising quotas are:

- Band 1 25%
- Band 2 35%
- Band 3 30%
- Band 4 10%

2. Property size

The size of vacant properties allocated to each Band by the quota system should reflect the household size profile in that Band. This would mean one bedroomed properties apportioned in the following way

- Band 1 25%
- Band 2 40%
- Band 3 25%
- Band 4 70%

3. Local targets

It is not proposed to introduce local targets at this stage. However, outcomes will be monitored over the course of 2007/08 with a view to considering their introduction in April 2008.

4. Diversity targets

The target for 2007/08 will be to continue to achieve allocations to BME groups in excess of the waiting list profile. However, we will carry out further analysis of local variations and bidding patterns to ascertain whether specific local targets are required for 2008 and to inform the interventions needed to achieve these. This will include analysis of lettings against specific BME groups.

Similarly we are not proposing targets for lettings to disabled applicants at this point in time. A large proportion of band 2 applicants have

medical priorities and we will analyse their experience more closely to understand whether other interventions are needed to accelerate rehousing. A database of adapted properties has been established and occupational therapists are engaged to support the matching of applicants to these properties or to recommend adaptations to other vacant properties. Manual offers may be used to best match applicants with specific needs to adapted properties.

5. Age group of applicants

In 2007/08, we will analyse the waiting list by age group to inform both local lettings policies and the sheltered housing strategy.

6. The needs of the decommissioning programme

There are 3 schemes in the decommissioning programme for 2007/08. These are the Stonebridge regeneration project requiring the rehousing of 170 households by 2009 and 2 smaller sheltered complexes at Totley Close and Camrose Close involving the rehousing of 24 tenants. The increased quota arrangements for band 2 will ensure a supply of vacant properties is provided to meet the needs of Stonebridge residents. There is a readily available supply of sheltered properties to accommodate the residents of Totley and Camrose Close. Manual offers will be used where necessary to match applicants and to ensure the regeneration projects progress as planned.

7. Temporary accommodation

At any one time approximately 65 vacant properties are in use as emergency temporary accommodation for NCH tenants displaced from permanent tenancies as a result of fire, major repairs, harassment or domestic violence. This policy is under review with a view to ceasing these arrangements.

8. Low Demand Register

A register of low demand properties has been established and reviewed and currently holds 2,130 properties of which 968 are sheltered properties.

This will be used to inform marketing strategies for these properties and future focussed investment planning.

9. Local lettings policies

A significant proportion of the housing stock is covered by local lettings policies. These policies relate to age or household size restriction to help manage potential lifestyle clashes or child density issues. They also include sensitive lettings policies designed to minimise anti-social behaviour (ASB) in certain areas by restricting allocations to those with a history of crime or ASB. The policies are reviewed biannually and changes recommended to the City Council. We are awaiting the outcome of recommendations made during 2006. If agreed, this would reduce the coverage of local lettings policies to 10% of the stock.

E. REVIEW OF THE LETTINGS PLAN

Allocations outcomes will be a regular agenda item on the Allocations Steering Group comprising tenant representatives and officers from NCC, NCH and partner RSLs. The data will be fully reviewed in September 2007 with an Equalities Impact assessment scheduled for November 2007. The findings will inform preparation for the 2008/09 Lettings Plan.

NOTTINGHAM HOMELINK CHOICE BASED LETTINGS PARTNERSHIP

JOINT RESPONSE TO CLG CONSULTATION PAPER, “ALLOCATION OF ACCOMMODATION: CHOICE BASED LETTINGS – CODE OF GUIDANCE FOR LOCAL HOUSING AUTHORITIES

This is a response from Nottingham City Council to the Communities and Local Government department’s draft code of guidance on allocations and choice based lettings, which was issued for consultation in January. It represents the views of all the partners in Nottingham’s CBL scheme, “HomeLink”. HomeLink is operated on behalf of the partners by the City Council’s ALMO, Nottingham City Homes.

Generally, the Code of Guidance is welcome as the 2002 Code was in urgent need of updating in order to reflect the increasing use by housing authorities of choice based lettings as the principal method of allocating rented homes.

The document as a whole is helpful in bringing clarity to a number of problem areas, and for the most part deals well with the thorny issue of balancing choice and need. There are however certain aspects of the draft code which we feel are either over-prescriptive or represent a rather subjective view of good practice in operating CBL.

Other comments are offered as suggestions to improve the code.

Chapter 1 – Purpose of the Code

1.3

It is stated that the guidance is supplementary to the 2002 code. Are there any plans to combine the two documents? Staff would probably prefer to not have to refer to two separate codes of guidance.

Chapter 2 – Overview of the legislative provisions and the Government’s “choice based lettings” policy

2.1 Typo – “Housing authority’s”...surely *housing authorities’* ?

2.8 This could be referenced by the 2006 report on monitoring the longer term impact of CBL.

Chapter 3 – Choice based lettings: general

3.2 Whilst it is a laudable principle to include supported accommodation in CBL, the practicalities of this unfortunately mean that it is very difficult to do so. Such accommodation is often tied into formal referral relationships involving social care agencies which means that choice is automatically limited. The HomeLink Partnership does advertise all sheltered accommodation, and most adapted properties. However, highly adapted properties can be manually allocated if the adaptations uniquely match the

needs of a disabled applicant. Advertising such a property would be merely “going through the motions”, and colleagues in Occupational Therapy and the Adaptations service were very anxious during the consultation for HomeLink to ensure that the appropriate and efficient allocation of significantly adapted properties was not undermined by CBL.

3.12 It should be a matter for individual schemes whether to limit the number of bids applicants can make per cycle, and we feel that the guidance should not make recommendations one way or another. It is clear from the exchanges on the “Choice Moves” CBL forum that opinion is evenly divided on this issue, so it seems odd that one view should be favoured in this document over the other.

The reason why we chose to limit the number of bids (to three per week) was to encourage more meaningful, considered and disciplined bidding, and also to make the system more manageable from an IT perspective. Ironically, it has been recommended in a recent review of HomeLink by a prominent consultancy firm that feedback should be given on failed bids. This would be totally impractical if we had unlimited bidding.

Chapter 4 Choice based lettings: policy content and scheme design

4.18 This statement is one of a number in the document which represents a subjective view, not necessarily backed up with evidence, eg customer surveys etc. How do we know that customers find it easier to understand schemes with a large number of bands rather than ones with a smaller number of bands and mechanisms for determining priority within them?

4.22 This paragraph assumes that authorities have within their scheme a “cumulative” and an “additional” preference band although there is no actual requirement to do so! It also seems to be advocating the (undesirable in our view) intervention of officers at the shortlisting stage to decide (which) “...applicants have the most pressing needs”.

4.31 The negative view of what is described here as “back –dating” is not shared by the partnership. This is again a rather subjective view, which suggests that customers do not have the capacity to understand the concept.

In a system which has time as the secondary “currency” after banding, it makes sense to award additional time to applicants in order to prioritise them. Furthermore, it enables a scheme to give priority to certain applicants *across all bands*. To illustrate this we would cite Nottingham’s policy of “local area preference”: In order to promote sustainable communities, local members wished to see applicants receive additional priority for properties in their local area if they had children at the local school and/or gave/received support in the area. The creation of another band would not be a satisfactory mechanism to achieve this because it could be applied to people in any of the bands. Therefore it was agreed to award additional waiting time within their band to those concerned. This practice was widely consulted upon and attracted no particular comments from either customers or stakeholders about being difficult to understand. The City Council has used the mechanism of what we would call “acceleration” for many years, specifically for hostel residents ready to move on and in order to determine differing levels of medical need. So the

practice is embedded in Nottingham, people seem to understand it and it does not appear to be a problem. It offered a practical solution to the recognition of composite/cumulative need without having to radically alter either the allocations policy or the IT system.

The draft guidance goes on to claim that “back-dating” “is likely to make monitoring and feedback information inherently unreliable”. This is not necessarily the case. As long as the applicant knows what their waiting time is, with or without acceleration, they are capable of comparing themselves to the successful cases in the feedback because they are comparing like with like.

The ability for customers to understand potentially complex concepts within allocations policy such as acceleration of waiting time can be influenced by the way in which they are communicated and explained. All the literature used within HomeLink, including the summary of the allocations policy has been awarded a crystal mark by the Plain English Campaign.

4.34 The guidance seems to be suggesting here that allocating outside the advertising scheme is preferable to taking into account different degrees of priority than “back-dating”, which seems perverse. Surely it is better to have a mechanistic way of dealing with this which eliminates officer discretion?

4.41 This guidance presents some difficulty for the City Council and its ALMO. For RSLs with a national or regional focus, less so.

We (NCC/NCH) do not have the resources to properly assess reasonable preference for applicants who do not live in our local area, and we are sure we are not alone in this. Therefore, unless a case has been nominated to us by another local authority via a “reciprocal” arrangement, we do not formally assess applicants from outside the City, and instead place them in a band below cases from the City of Nottingham. However, they are allocated a “virtual” banding for the purposes of bidding for RSL properties. There is still the opportunity to bid for NCC properties in band 5, but it is only if a property cannot be let to an applicant within the City that such applicants would be considered. We are sure that such an approach is common.

This guidance in this paragraph is therefore impossible for us to comply with within our current policy. It feels like CLG is attempting to deliver regional/national CBL schemes via this guidance rather than the more structured approach of sub regional partnerships . This takes on added significance in the light of the abandonment of the main mechanism for people in housing need to move to another area of the country, namely the HOMES Mobility Scheme, and the failure of the Move UK project.

4.72 This is a non sequitur. Why should giving opportunity to non-priority applicants to bid for higher demand properties automatically result in concentrations of homeless families in unpopular/deprived areas? Surely the reverse could be argued ie, a scheme in which all popular properties went to high need, reasonable preference applicants might lead to over-concentrations of vulnerable people in specific areas and imbalanced communities.

4.74 (i) It seems highly unlikely that any authority other than one with very low demand would be able to meet the needs of its own customers without a local connection policy of some sort.

4.74 (iii) This is precisely the kind of scenario that the HOMES Mobility Scheme was there to address, and we would ask whether CLG is attempting to compensate for its loss by introducing new requirements in the allocations guidance.

Generally on this point, everyone would agree that council housing needs to be a tenure which is more effective in promoting mobility. The Hills report highlights the current failings of the sector in this area. But it cannot be achieved via guidance on allocations schemes whilst authorities struggle to meet the needs of “home grown” applicants as council stocks shrink. Suggestions such as that at 4.74 (v) therefore seem unlikely to be achievable.

Within the HomeLink Partnership, the RSLs provide opportunities for inward mobility. Beyond their 50% nominations obligations most of them consider applicants from outside the City, and the City Council is happy with this. The reason they are able to do it is clear: They do not have the same local accountability and obligations towards the local community that the Council has.

Chapter 5 – Managing a Choice Based Lettings Scheme

5.11 There is a practical difficulty with providing feedback on unsuccessful bids even when the number of bids is restricted. Elsewhere in the code, no restriction on the number of bids is recommended. Here, authorities are being encouraged to provide personalised feedback. How can these be reconciled?

Chapter 6 – Delivering choice in partnership with registered social landlords and private sector landlords

6.5 It is clearly important to monitor RSL performance in meeting housing need, but this seems to be bringing unnecessary complication from a customer perspective. Does the applicant care whether the RSL vacancy they are bidding for is a “nomination” or not? Part of the beauty of CBL in partnership with RSLs via a common housing register is that it rids us of the bureaucracy of the old nominations system. This suggestion seems to add to it. We must however be able to identify specific addresses, ie new build, in which there is a nomination requirement on first letting.

The next two paragraphs headed “Common housing registers” fail to adequately promote the benefits which such an approach brings, ie an end to the bureaucracy of nominations. This is particularly the case in a scheme like Homelink where we effectively have a common allocations policy also. This means that with close monitoring we can easily identify which RSL allocations have been made to applicants in housing need, ie cases which would be considered to be “nominations”.

Paras 6.18 -6.22 Where do Arms Length Management Organisations fit into these provisions? The guide needs to be explicit about what the relative duties/responsibilities are in an ALMO situation.

Finally, we suggest that the code could contain appendices which give more detailed advice about some of the practicalities developing CBL. There is a lot of learning which could be summarised in such appendices, eg problematic issues such as Information Technology, sharing costs etc.

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