

Committee: Community and Children's Services Committee	Dated: 14/09/2018
Subject: Housing Register and Allocations	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report authors: Liam Gillespie, Head of Estates Martin Goodwin, Housing Needs Manager Department of Community and Children's Services	

Summary

This report has been written to provide detailed information about the City's Housing Register in response to Member interest. To provide context, comparison is made with other boroughs and details given about their social housing waiting lists.

The City's stock of social housing is small. One-third of the original supply has been sold under Right to Buy legislation and is now in private ownership. Inevitably, some applicants in low housing need will face a significant wait for a property to be allocated to them. Unlike many local authorities, the City accepts applicants with low, or no housing need onto its register, and these are the households that face the longest wait. Despite this, the City compares favourably to many other boroughs. Those in the greatest housing need are housed by the City more quickly than in most other London boroughs.

Recommendation

- Members are asked to note the report.

Main Report

Background

1. By law, local authorities must clearly set out procedures and priorities by which social housing will be allocated. Part VI of the Housing Act 1996 states that local authorities must give "reasonable preference" to certain categories of people. These are prescribed by the Act and are as follows:
 - People who are legally classed as homeless (or threatened with homelessness)
 - People living in unsanitary, overcrowded or otherwise unsatisfactory housing
 - People who need to move for medical or welfare reasons
 - People who need to move to a particular area (for example, to be nearer to special medical facilities) and who would suffer hardship if they were unable to do so.

2. A local authority Housing Register does not just cover its own properties, but also includes those of other housing providers to which it has nomination rights. In the City, this includes a number of properties owned by Guinness South, at Mansell Street.

Current Position

3. The City Corporation has 1,803 general needs properties as part of the Housing Revenue Account. Approximately 25% of these are in the City of London itself. Table 1 in Appendix 1 gives a breakdown of the size and numbers of properties.
4. There are 642 social housing properties in the Square Mile: 448 are managed by the City of London; and 194 are managed by Guinness South.
5. There is only one general needs housing association in the City – Guinness South – which has an estate in Portsoken (the Mansell Street Estate). This consists of 194 properties (38 studio flats, 70 one-beds, 38 two-beds and 48 three-beds). The City gets nomination rights on 50% of studios and one-bedroom properties, and at least 75% of other units at this location.
6. The City of London has nomination agreements with several housing associations based outside the City. Most of these nomination agreements cover specific properties, so the City will nominate a replacement tenant when a property becomes vacant. Nominations in recent years are shown in Table 3 in Appendix 1.
7. This report covers general needs housing only, as this is where there is most demand. However, there is data in Appendix 1 (Tables 11–13) relating to sheltered housing properties and demand. In brief, the City has a total of 81 sheltered housing units, and nomination rights to a further 19 at Tudor Rose Court, run by Hanover Housing Association. Most applicants for sheltered properties want specific schemes, and many apply well before they have a housing need, in case their circumstances change. The entire waiting list for sheltered properties, including Tudor Rose Court, currently totals 39.

The City's Housing Register (or 'Waiting List')

8. The City of London operates a points-based system for its Housing Register. This considers applicants' level of housing need and other priorities – for example, medical or welfare needs, in accordance with the "reasonable preference" definition. The higher the level of housing need and priority, the higher the number of points awarded.
9. Unlike in many local authorities, acceptance onto the City's Housing Register is not confined to those with reasonable preference. The City allows anyone who is eligible under Housing Law (and who has a local connection) to register, subject to certain conditions. A local connection, in the City, means anyone who lives or works more than 16 hours a week in the Square Mile (provided they have done so for the last two years), or is the son or daughter of a secure City Corporation tenant.

10. There are currently 695 households on the City's Housing Register.

Table 1. Applicants on the Housing Register

Year	Number on Housing Register at end of year
2014-15	693
2015-16	815
2016-17	853
2017-18	656
2018-19	(as at 01/07/18) 695

Table 2: Property size needs of those on Housing Register

Size of property	Total number on Housing Register	% of total Register	Applicants who are existing tenants wishing to transfer
Studio	293	42%	0
1 bed	105	15%	38
2 bed	201	29%	60
3 bed	82	12%	37
4 bed	14	2%	8
Total	(Including transfers) 695		143

11. Of those who are registered:

- 231 applicants have reasonable preference
- 185 of these applications show the household is moderately overcrowded (that is, lacking one bedroom)
- 32 households are severely overcrowded (that is, lacking two bedrooms)
- nine are homeless households living in temporary accommodation for over 12 months
- eight households either require management moves or will be made a direct offer (for example, care leavers or other applicants for whom a quota of properties is allocated).

12. The remaining applicants who do not have reasonable preference are already City tenants:

- 19 households wish to downsize to a smaller property
- 27 households are tenants aged over 45 years who live in a studio but wish to move to a one-bedroom property.

Table 3: Current housing need (shading shows those applicants who meet the “reasonable preference” criteria)

Level of need	Studio	1 bed	2 bed	3 bed	4 bed	Total
‘Unpointed’ (awaiting allocation of points as application incomplete or needs further checks)	30	13	19	6	0	68
Currently adequately housed (includes tenants wishing to downsize or move from a studio to a 1-bed, those with low-priority need and applicants who are eligible solely on the grounds of low income or being sons and daughters of tenants)	223	79	81	12	1	396
Moderate overcrowding (needing one extra bedroom)	35	12	80	53	5	185
Severe overcrowding (needing two extra bedrooms)	0	0	16	8	8	32
Homeless and in temporary accommodation	4	0	4	1	0	9
High-priority need	1	1	1	2	0	5
TOTAL	293	105	201	82	14	695

13. The Allocations Scheme also acknowledges that most private rented sector housing is unaffordable for people on a low income by giving priority to people who earn less than £30,000 per annum, even where they have no other housing need. This includes people who are in receipt of benefits. This accounts for 208 applications (30% of the Register).
14. Anyone who lives or works in the City but earns over £30,000 p.a. and has no other housing need is still able to register for housing. This accounts for 96 applications – currently 14% of the Register.
15. More than 60 of the applicants are not yet fully registered, as they either have not provided all their information, or are not yet eligible to start bidding.
16. The length of time on the Register does not automatically entitle households to higher priority. Need is considered to be more important than length of time on the list, and it would not be appropriate for an applicant with no particular need to be given a social home above an applicant with high need. However, if two households have the same level of priority, then the offer is made to the one who has been waiting the longest.
17. Some applicants may have no housing need but are in tied accommodation that they know will eventually come to an end, so they register as an insurance for their future. Applicants whose housing situation worsens during their time on the Register may see their priority increase. Someone may have registered many

years ago but their health, or the overcrowding in their property, may worsen. As long as their bedroom need does not change, their Registration date would remain the same, but their priority may increase.

Lettings

18. The number of households on the Housing Register that can be offered a property each year depends, of course, entirely on the number of properties that become vacant during the year.

Table 4. Number of applicants successfully housed each year from the City's waiting list

Year	Applicants housed
2012-13	113
2013-14	150
2014-15	92
2015-16	145
2016-17	86
2017-18	74

19. The number of housed households includes a small number of nominations from other boroughs into City-managed housing and special projects (for example, care leavers, hostel move on). Most of these would not have been part of the waiting list.
20. The length of time that the successfully housed applicants will have waited on the Housing Register will depend on many factors, including the size of the property they need, their priority and whether they are open to being housed on a number of estates, or wish to restrict their options to only one estate.
21. Of the 74 applicants housed in 2017–18, the average number of days they had been waiting was as follows:

Table 5. Average number of days on Housing Register for successful applicants in 2017–18

Size of property	Number of days on Housing Register
Studio	681
1 bed	815
2 bed	666
3 bed	1641
4 bed	N/A

22. On average, successful applicants for studio and two-bedroom properties had waited less than two years on the Housing Register. Applicants for one-bedroom properties had waited less than three years. Applicants for three-bedroom properties had waited approximately four-and-a-half years, because of the low turnover in these flats.
23. No four-bedroom properties became available in 2017–18. Because of the scarcity of these properties (only three have become available in the last five years) applicants have waited an average of just over eight years for them.
24. Further data on the number of lettings each year, the locations and size of properties, is available in Tables 4, 5 and 6 of Appendix 1.
25. An article in *City Matters* (July 2018) quoted a Shelter figure of only 26 social housing lettings available in 2016–17. However, this figure related only to those properties let in the Square Mile in that year. The actual number of properties let by the City in that year across all its estates was 86.
26. The Shelter report stated that the City was found to be the third-worst in England for the number of lettings. Again, this was based solely on lettings in the Square Mile. When the true lettings figures are taken into account, the City performs significantly better than other London boroughs.
27. One measure used by Shelter is the number of applicants on the Housing Register, divided by the number of homes available in any one year. In 2016–17, using just the 26 lettings in the Square Mile, the figure quoted by Shelter was 33 applicants per available property. However, when the true figure of 86 lettings is used, the total is just 10 applicants per available property. This actually puts the City at the top of the comparator group.
28. Another measure used is the percentage of total stock let each year. The City's performance for this is 4.77%. Using the comparators used by Shelter, the City performs better than other London boroughs, and only local authorities outside London perform better than the City. Tables 7 and 8 in Appendix 1 give the comparative figures to demonstrate this.

Choice-based Letting (CBL) and Bidding for Properties

29. Most properties are let via CBL. This is a system used throughout the UK, whereby applicants bid for vacant properties, based on the number of points they have.
30. The properties available are advertised each week. The advertisements detail the property, its location, floor level, rent payable, type of heating, and so on. Applicants can bid for any properties suitable in size for their housing need. The bidder with the highest points when bidding closes is offered the property the following day. They have a window of opportunity to view and accept the offer, or to refuse it.

31. Certain categories of applicants do not bid for properties, but are made a direct offer of housing. These include some people in nominated hostels, management transfers for City Tenants, care leavers and people leaving supported housing.
32. The low number of properties in the City's stock and the existence of only two housing associations within our area (the Guinness Partnership and Hanover) means that it is difficult for us to house people with low priority. Most people housed via CBL are in one of the reasonable preference categories.
33. Most of the City's properties are accepted by the household that won the bid – if they decline the property for any reason, it is then offered to the next-highest bidder.
34. We do not compel applicants to bid. However, we make sure that all applicants are supported to do so, if they wish. We provide detailed instructions on how to bid to all applicants who can also access training from the Housing Needs team. If an applicant has difficulty in bidding – for example, if they have no access to IT, or cannot use a computer, the Housing Needs team will bid for suitable properties on their behalf. This means that those who are registered and who have never bid are likely exercising a choice rather than not being able to do so.
35. Some applicants want to live on a specific estate, or in a particular block, and will only bid on properties that match their criteria. Often, people who are registered to downsize are only prepared to bid for properties on the estate where they already live. This is understandable, but may mean they face a lengthy wait for a property.
36. Of the 695 households currently on the Housing Register, 227 general needs applicants (which is 33% of the Register) have never placed a bid. Obviously, this affects the amount of time they are on the waiting list – if they never make a bid, they will be waiting indefinitely, or until they are no longer eligible and are removed from the list.

Table 6. Waiting times for applicants who have never placed a CBL bid

Waiting time	Total number of applicants on list	Never bid	Percentage of applicants waiting for this time who have never bid	Percentage of total Register
Over 10 years	39	14	35%	2%
5-10 years	95	32	33%	5%
2-5 years	238	57	24%	8%
1-2 years	164	62	38%	9%
0-1 years	159	62	39%	9%
Total	695	227		33%

37. Table 9 in Appendix 1 shows the reasonable preference of applicants who have never bid for a property. Almost half (43%) of those who are suffering severe overcrowding have never bid for a property and half of them have been waiting

more than two years. While those who need a four-bedroom property will have a significant wait, due to the lack of stock and the small number of empty properties that become available, there have been several two- and three-bedroom properties available during this time.

38. An example of how non-bidding can affect an applicant's waiting time is as follows: one household has been registered for a four-bedroom property since 2005. They have bid only four times since then. They have been made three offers of properties, including a new-build property. They have turned down all three, either on the grounds that they were "too small" or "in the wrong area". They have, therefore, now been on the Housing Register for 13 years, which on paper reflects badly on the City but is, in fact, their own choice.

Current Waiting Times

39. Most applicants (81%) have been waiting for housing for less than five years.

Table 7. Waiting times by bed size requirement

Waiting time	Total number of applicants on list	Studio	1 bed	2 bed	3 bed	4 bed
Over 10 years	39	15	8	7	5	4
5-10 years	95	40	11	34	8	2
2-5 years	238	105	36	66	27	4
1-2 years	164	66	23	48	23	4
0-1 year	159	67	27	46	19	0
Total	695	293	105	201	82	14

40. Of households in reasonable preference categories, 78% have been waiting for less than five years. The majority of those are moderately overcrowded – that is, lacking one bedroom.

Table 8. Waiting times by priority (shading shows "reasonable preference" categories)

Level of need	10+ years	5-10 years	2-5 years	1-2 years	<1 year
Currently adequately housed (includes tenants wishing to downsize or move from a studio to a 1-bed, those with low-priority need and applicants who are eligible solely on the grounds of low income or being sons and daughters of tenants)	30	75	156	106	96
Moderate overcrowding (needing one extra bedroom)	4	19	79	40	44
Severe overcrowding (needing two extra bedrooms)	5	1	2	14	10

Homeless and in temporary accommodation	0	0	1	4	4
High-priority need	0	0	0	0	5
TOTAL	39	95	238	164	159

Removal from the Register

41. The Housing Needs team undertakes regular reviews of all applications on the Register. A census of all registered applicants takes place, on average, every 18 months, to ensure that all information we hold is up to date. The census identifies applicants who have lost their local connection or who have become ineligible for some other reason. It also identifies applicants who have not informed us of a change of circumstances (such as a disability or drop in income) which means their priority has increased. In addition, it allows us to give a level of scrutiny that can identify fraudulent applications and remove these from the list.
42. In 2017–18, a total of 114 applicants were removed from the list: most were because they no longer had a connection to the area; some cancelled their application; and a few were identified as fraudulent. Table 10 in Appendix 1 shows the number of applicants removed from the register in previous years.
43. In 2015, Camden Council reduced its Housing Register by more than 20,000 households. According to a spokesperson at the time, “60% of applicants on our waiting list of 30,000 never bid and 6,000 people don’t even currently live in Camden”.

Local Connection for Applicants

44. As outlined in paragraphs 8 and 9, the City does not restrict eligibility for the Housing Register to those with a reasonable preference. It also allows people with no housing need to register if they have a local connection.
45. The City’s main local connection criterion is that the applicant has lived in the Square Mile for the last two years. Most London boroughs require a period of between three and five years before they will consider an application from a resident.
46. The City is one of only three London boroughs that allows people working within its boundaries to apply to the Housing Register. The other two boroughs also insist that the applicant must have a housing need, such as overcrowding. The City does not require this – only that the applicant has worked in the Square Mile for more than two years.
47. The City also accepts applications from sons and daughters of existing tenants. We have 41 applicants registered under the “sons and daughters” priority. Three of these live in the Square Mile.

Comparisons with other London Boroughs

48. If we compare the City with some other London boroughs (see Appendices 2 and 3 for data) we can see that all face similar challenges regarding the average waiting times for social housing. The eligibility criteria for the City Housing Register is more inclusive; we allow two years' employment within the Square Mile as sufficient local connection, irrespective of housing need. No other London borough allows this.
49. Hammersmith & Fulham has 12 times more social housing than the City, and has almost twice the number of people on the Housing Register, but sets stricter eligibility criteria for their waiting list. Applicants must be resident for at least five years, and their bedroom standard does not recognise moderate overcrowding. Therefore, they are only likely to rehouse people who are in a reasonable preference group. Their average waiting times are slightly better than the City's for most sizes, but significantly better for four-bedroom properties.
50. Westminster has more than 12 times the amount of public housing, has almost five times the quantity of households on the Register, and significantly longer waiting times for most of its social housing.
51. Croydon has twice the amount of social housing, and nearly six times the amount of people on the Housing Register compared to the City. Redbridge has over four times the amount of social housing and nearly 10 times the amount of people on their Housing Register.

Table 9. Average waiting times for Croydon, Hammersmith & Fulham, Redbridge, Westminster and City of London (2016–17)

Borough	Number on Housing Register	Number of social homes	Average waiting times (in years)				
			Studio	1 bed	2 bed	3 bed	4+ bed
City of London	853	1997	1.33	1.92	2.25	2.2	8
Croydon	5,052	26,410		2.26	3.96	4.22	6.88
Hammersmith & Fulham	1,577	25,760		1	1.92	2	3.42
Redbridge	8,335	9,300	5.7	7.1	8.1	11.1	9.5
Westminster	4,222	27,440		1	10	16	34

Conclusion

52. While some households on the City of London's Housing Register will face a long wait for housing – especially those who are currently adequately housed – our statistics show that those in the greatest need are being housed faster than in

many other London Boroughs. We recognise that households on low incomes are disadvantaged by the current housing market and our Allocations Scheme attempts to assist those who find the current private rented sector to be unaffordable.

53. Our criteria for accepting applicants onto the Housing Register are less restrictive than some other councils' conditions for entry onto the register. This results in some households, which are currently adequately housed, appearing in statistics as experiencing long waits for accommodation.

Appendices

- Appendix 1 – City of London Housing Register data tables
- Appendix 2 – Comparative Housing Register statistics for all London Boroughs 2016-17
- Appendix 3 – Waiting times for a sample of London Boroughs

Liam Gillespie

Head of Estates

Department of Community and Children's Services

T: 020 7332 3308

E: liam.gillespie@cityoflondon.gov.uk

Martin Goodwin

Housing Needs Manager

Department of Community and Children's Services

T: 020 7332 3542

E: martin.goodwin@cityoflondon.gov.uk