

<b>Committee</b>	<b>Dated:</b>
Community and Children's Services	24 July 2020
<b>Subject:</b> Proposed Local Lettings Policy	<b>Public</b>
<b>Report of:</b> Andrew Carter, Director of Community and Children's Services	<b>For Decision</b>
<b>Report author:</b> Simon Cribbens, Assistant Director – Commissioning and Partnerships	

### Summary

This report seeks approval for the introduction of a time limited local lettings policy. The policy will enhance the priority of tenants seeking a transfer through the “studio upgrade” criterion of the Housing Allocations Scheme. In doing so, it seeks to fulfil the policy objective of increasing the number of studio voids for move-on allocation to people who have been housed in emergency accommodation from the City's streets during the COVID-19 pandemic.

### Recommendation

Members are asked to:

- Approve the local lettings policy – studio upgrade enhancement

### Main Report

#### Background

1. In response to the COVID-19 pandemic the City Corporation secured emergency hotel accommodation for people sleeping rough in the Square Mile. This accommodation is likely to be available in the short term.
2. The City Corporation has committed through its Homelessness and Rough Sleeping Strategy 2019-2023 to ensure that no-one need return to rough sleeping. To meet this commitment, the City Corporation must deliver more opportunities in its accommodation pathway – including opportunities to move into a social housing tenancy.

#### Current Position

3. The City Corporation has assisted over 100 people into accommodation since the onset of the COVID-19 pandemic. To prevent their return to the streets will require access to a range of accommodation and service offers including

supporting housing, social care, private rented sector housing, social housing tenancies and support to reconnect to home areas.

4. Allocation of suitable social housing provides an opportunity to meet the City Corporation's housing responsibility to some, and to create vacancies in specialist hostel accommodation for those with support needs.
5. Where the allocation of a City of London tenancy is to a single person, the City Corporation's Housing Allocations Scheme states that they normally qualify for a studio property only.
6. There are no current developments that will provide new opportunities for studio homes. Therefore, these will only arise where a current tenant moves from their home.
7. The allocations scheme already supports a 'studio upgrade' policy for existing tenants of studio homes - providing an opportunity to those who qualify to transfer into a one-bedroom home.

## **Proposals**

8. It is proposed that a local lettings policy (Appendix 1) be implemented to help meet the City Corporation's objective that no one need return to the streets.
9. Such a policy enables housing authorities to allocate accommodation to people of a particular description outside of the priorities set in its allocations scheme, or as required by legislation. This can be done provided that overall the authority is able to demonstrate compliance with the requirements of relevant housing allocations legislation.
10. Local letting policies may be used to achieve a wide variety of housing management and policy objectives. However, they must not dominate the allocation of homes and, as such, are usually time limited, and restricted to particular properties, estates, areas and/or applicants.
11. The proposed policy would increase by 100 the points allocated to applicants to the studio upgrade scheme – increasing their chances of securing a one-bedroom home.
12. It aims primarily to incentivise the opportunity to move through the addition of a time limited points uplift. Although those who benefit from this change will secure one-bedroom accommodation, the additional points allocation does not exclude other households on the waiting list with higher points from securing a one-bedroom home. As such it would not determine that every one-bedroom home will be allocated in this way.
13. The current points allocation from the City's approved Housing Allocations Scheme is set out below. An applicant's points are determined by needs and can combine primary and secondary needs. Their total points provide their relative priority to other needs groups.

Primary Points		Secondary Points	
Management Transfer	800	Overcrowding	25
Under –occupying	400	Mixed sibling sharing teenager	10
Severe medical / welfare	275	Medical / welfare	
		Severe	50
		Moderate	25
		Low	10
Severe overcrowding	250	Sharing	
		Family	5
		<i>Non family 1 - 4</i>	10
		<i>Non family 5 - 10</i>	15
Studio upgrade	250	Lack of tenancy	5
Decants	225	Bedroom cap	50
Moderate medical / welfare	225	Long TA Stay	150
Moderate overcrowding	200	Advice and engagement	15
Homeless	140	Intentionality	Minus 50
Low income City Connection	100	Decant urgency	100 200
Sons & Daughters	50		
Low Priority	1		

14. The increase of points for studio upgrade to 350 would give this group of applicants greater priority than some other applicants who need a one-bedroom home – such as households with severe medical need and homeless people who have been in temporary accommodation for more than 12 months.
15. At present there are 115 people on the City Corporation housing waiting list seeking a one-bedroom property. There are currently no applicants on the housing waiting list for a one-bedroom property who fall into either the severe medical need or long-term temporary accommodation categories.
16. While the points allocation would be greater for those severely overcrowded, such households would (at a minimum) qualify for a two-bedroom property, and therefore are not affected by this policy.
17. Where an applicant benefits from this policy and transfers out of a studio, the consequent void will be allocated through a direct letting quota to those in temporary or hostel accommodation, in line with the objectives of the policy.
18. The quota will be capped at 15 properties. In 2019/20 28 studio properties were let; 33 in 2018/19; and 28 in 2017/18. The direct allocation of these studio homes will reduce the opportunities for those on the waiting list for such a property.
19. There are currently 308 applicants for a studio home on the housing waiting list. One is homeless in long term temporary accommodation, two have moderate medical needs and one moderate welfare needs. A further 45 applicants lack a bedroom (200 points). The remaining applicants fall into lower priority (below 200 points) categories.
20. The allocations scheme allows for direct offers to some groups including those defined in section 11.2.ii manage temporary accommodation:

*One direct offer may be made to homeless households where this is necessary to manage the use of temporary accommodation and to enable the City Corporation to meet its statutory homeless duties.*

21. Statutory duties include those of the Homelessness Reduction Act 2017 which encourage local authorities to take a 'flexible approach' and begin to take reasonable steps to prevent homelessness rather than waiting until the applicant meets the legal definition.
22. It is proposed that this local lettings policy be in place until 31 March 2021, at which point it must either be renewed or replaced, or the allocation of homes will be governed by the Housing Allocation Scheme. Members would have to consider whether further extension would result in the change dominating the allocation of one-bedroom homes, and whether this was a substantial change to the allocations scheme, therefore requiring consultation.
23. The proposed policy has been subject to an Equalities impact Assessment (appended). It notes that some target equality groups are over-represented on the housing waiting list and among those who sleep rough. In consideration of potential impacts, the policy has been framed so that the proposed uplift in points does not significantly disadvantage those with high housing needs. The potential for negative impacts is further mitigated by the time-limited duration of the policy.
24. The current allocations scheme, which provides for the implementation of a local lettings policy, was subject to consultation at the time of its development and approved by Members. As this change is not seen as a substantial change to the allocations scheme it is considered that further consultation would not be required.

## **Corporate & Strategic Implications**

The proposed policy is consistent with the Corporate Plan aim to “contribute to a flourishing society” and the Outcome 4 of the City Corporation’s Homelessness and Rough Sleeping Strategy 2019-2023: “nobody needs to return to homelessness”.

## **Implications**

25. The City Corporation is able to develop and implement local lettings policies. The statutory basis for this is Section 166A (6) of the Housing Act 1996 which states:
  - (6) Subject to subsection (3), the scheme may contain provision about the allocation of particular housing accommodation—
    - (a) to a person who makes a specific application for that accommodation;
    - (b) to persons of a particular description (whether or not they are within subsection (3)).

Legal implications have been included in the body of this report.

## **Health Implications**

26. Preventing people returning to rough sleeping will tackle the significant health inequalities people who sleep rough experience.

## **Conclusion**

27. The proposed policy will support the City Corporation's stated commitment to preventing a return to rough sleeping.

## **Appendices**

- Appendix 1 – Local Lettings Policy: Enhanced studio upgrade
- Appendix 2 – Equalities Impact Assessment

## **Simon Cribbens**

Assistant Director – Commissioning and Partnerships

E: [simon.cribbens@cityoflondon.gov.uk](mailto:simon.cribbens@cityoflondon.gov.uk)