

<b>Committee(s):</b>	<b>Date(s):</b>
Housing Management and Almshouses (Community and Children's Services) Sub Committee	14 September 2015
<b>Subject:</b> The City of London Corporation Housing Allocation Scheme 2015	<b>Public</b>
<b>Report of:</b> Director of Community and Children's Services	<b>For Decision</b>
<b>Summary</b>	
<p>This report presents the revised City of London Corporation Housing Allocation Scheme. The Scheme has been revised following feedback from the Housing User Board and in response to legislative developments and also to the challenges faced by the Corporation from increasing demand for its limited housing stock.</p> <p>The main changes include strengthening of the employment local connection rule. Amendment to the bands include removing from band 1 (high need) and placing into band 2 (medium need): <i>homeless households to whom the City Corporation has accepted a statutory duty to accommodate</i>. There is now also clearer recognition of members of the armed forces who may qualify without a local connection and in some circumstances given additional priority.</p> <p>A two week consultation of the proposed revisions was undertaken. Responses supported the changes proposed.</p> <p>The revised Policy supports the Department of Community and Children's Services strategic business priorities to develop strong neighbourhoods and ensuring people have a decent place to live.</p>	
<b>Recommendation(s)</b>	
Members are asked to:	
<ul style="list-style-type: none"> <li>Note the revised City of London Corporation Housing Allocation Scheme (as attached in Appendix 1 to this report) and recommend it to the Community &amp; Children's Services Committee for approval.</li> </ul>	

## **Main Report**

### **Background**

1. The City Corporation's policy on housing waiting lists and nomination to affordable housing are governed by a number of Acts and Guidance. The most important ones are the Housing Act 1996; the Housing Act 2004; the Homelessness Act 2002; Localism Act 2011 and Guidance issued in 2012 and 2013.

2. The Corporation adopted its current Housing Register and Allocations Policy on May 2014. The 2014 Policy marked a significant change of practice for the City Corporation because it enabled the Corporation to utilise the new powers and flexibilities granted to local authorities by the Localism Act 2011 and Codes of Guidance issued in 2012 and 2013.
3. The 2014 policy made use of the ability for local authorities to set local connection qualification rules, to ensure homes go to households with a housing need and to set the allocation priorities to meet local needs and circumstances.
4. A range of local qualification rules were implemented at this time including local connection, household income savings limit, no rent arrears, no anti-social behaviour, as well as some others. Waiting list households were required to have a housing need as set out in the housing need priority bands 1-3.
5. The 2014 policy has been operating for almost one year. During this time, a number of issues have arisen which need to be addressed to enable the policy to operate more fairly and consistently. Furthermore, the local and national housing market has changed. Most notably an increase in private rental costs has placed more pressure on the City Corporation's Register and Housing Needs Service. Revisions to the policy are intended to reduce pressure.

### **Current Position**

6. A number of changes were proposed to the policy and a two week consultation period was undertaken on the proposed revisions with the Housing User Board. Responses supported the changes proposed. The consultation and changes are detailed below.

### **Consultation**

7. A consultation was undertaken with the Housing User Board. This took place in August 2015. All members of the Board were invited to take part in a survey. The survey detailed the proposed revisions to the existing policy and a link to the existing policy. The survey was available on line and on request hard copies of the survey were available to post to interested parties.

### **Changes to Local Connection and Qualifying Criteria**

8. Supplementary guidance issued in December 2013, encourages local authorities to implement a two year residency test. In line with this, the twelve month City residency local connection requirement will be extended from 12 to 24 months. An extension to the length of time of employment local connection will extend from twelve to 24 months. This change reflects a need for applicants to demonstrate a stronger commitment to the City and better aligns this local connection with the residency qualification.

## **Local Connection and moving for work**

9. On 9 March 2015, the Government announced that it would introduce “Right to Move” regulations to “ensure local connection requirements do not prevent social tenants from moving into the area to take up work or apprenticeships opportunities”. This new guidance also includes “an expectation for local authorities to set aside a proportion of their lets for social tenants who need to move across local authority boundaries for work related reasons”. The guidance sets a minimum expectation of 1% of lets, although it is for local authorities to decide on the appropriate proportion in the light of local circumstances.
10. To meet this, the revised allocation scheme will allow social housing tenants without a local connection to the City, but who are seeking a move to the City of London to take up work or be closer to work to approach the City Corporation for social housing. The City Corporation will make up to one per cent of its voids available to meet the needs of this group. Where such a household is accommodated a direct offer will be made for a property suitable for the household.

## **Armed Forces Personnel and Local Connection**

11. In encouraging authorities to implement the two year residency test for social housing applicants, the guidance also states that authorities must make an exception for certain members of the regular and reserve Armed Forces. Therefore, this revised scheme now places into the priority band 3, members of the regular and reserve armed forces *without* local connection to the City or their bereaved spouses who need to move because of serious injury, a medical condition or disability sustained as a result of their service. This new revision recognises the special position of members of the Armed Forces (and their families) whose employment requires them to be mobile and who are likely therefore to be particularly disadvantaged by local connection requirements; as well as those injured reservists who may need to move to the City to access treatment, care or support.

## **Changes to the priority bands**

12. The following applicants will be removed from band 1 (high need) and placed into band 2 (medium need): *homeless households to whom the City Corporation has accepted a statutory duty to accommodate*. They will be made a single, suitable direct offer, and if their application is successful, the City Corporation will discharge its homeless duty in accordance with legislation. However, in line with its Homelessness Strategy, The City Corporation will also seek to discharge its full homelessness duty where it can secure a reasonable offer of accommodation in the private rented sector.

### **Allocations made outside the process**

13. The revised policy will raise the age of applicants entitled to sheltered accommodation from 60 years to the state retirement age for women. This will be in line with the eligibility criteria set for the City of London and Gresham Almshouses.

### **The Right to Buy**

14. The revised Allocation Scheme takes into account the changes made to the Right to Buy legislation which came into effect in July 2014. The Scheme will stipulate that households who have previously exercised their right to buy or have received a cash incentive for a mortgage and then subsequently sell their property, will not be eligible to join the City Corporation Housing Register. Exemptions to this rule the circumstance when a homeless duty is accepted by the City Corporation under Part VII of the Housing Act 1996.

### **Corporate & Strategic Implications**

15. The revised Policy supports the Department of Community and Children's Services strategic business priorities to develop strong neighbourhoods and ensuring people have a decent place to live.

### **Implications**

16. The Localism Act 2011 requires the City Corporation to publish an allocation scheme for determining priorities and the procedure to be followed in allocating housing accommodation. Guidance issued in December 2013, provides further assistance to local authorities on making full use of the flexibilities within allocation legislation to better meet the needs of their local residents. This revised Allocation Scheme aims to make better use of the assistance provided by the guidance. Specifically, this revised Scheme strengthens the employment local connection and includes some flexibility and exceptions to the local connection qualification.

### **Conclusion**

17. This report presents the revised City of London Corporation revised Housing Allocation Policy. The revisions have been informed through consultation and in response to recently introduced legislation and guidance.

### **Appendices**

Appendix 1- The City of London Housing Allocation Scheme

#### **Nina Bhakri**

Policy Officer

Community and Children's Services

T: 020 7332 1214

E: [nina.bhakri@cityoflondon.gov.uk](mailto:nina.bhakri@cityoflondon.gov.uk)