Housing Strategy

Consultee	Comment
Mayor of London (4 July 2012 Meeting – Meeting Note 30 July 2012)	GLA broadly content with the draft strategy. Queried how home ownership could be increased in a sustainable way and noted that the Council's promoted product Discount Market Sale is popular. GLA interested in the Council's support for the 'slivers of equity' model and were keen to work with H&F to develop this further.
Housing Association Forum (6 July 2012 Meeting)	General Comments Documents were too prescriptive about what the council intended to and how they intended partners to work with them
(o cary 2012 mooming)	Allocations process potentially more time-consuming; Joint working with housing associations needs to better promoted; Documents do not identify what housing associations were doing already; On fixed term tenancies, housing associations have issues around how their policies can be aligned with different local housing authority policies. Related to this was how internal procedures can be aligned also; Large and small housing associations may have different perspectives on how local authority policies can be accommodated; Issue of proportionality: the specific changes proposed need to be worth the benefits that are being sought.
	Draft Housing Strategy
	A more general and significant question related to what the offer from LBHF is to housing associations. HAs are in a good position to deliver new affordable housing. It's an opportunity to review what has happened in the recent past and what can be improved. HAs want a new opportunity to work with the Council in what is a rapidly changing environment. There are many opportunities available in LBHF and HAs wanted a fair chance at taking them.
	HAs wish to have more opportunities to develop and want to be seen as key partners to develop a range of affordable housing types.
	Agreed that a greater focus is needed on partnership working in the document.
LBHF	Private Sector Renewal – Jane Rayner. Tracts need to be included to reflect statutory strategy and role.
Consideration of recent CLG Guidance / Proposals	Pay to Stay; homelessness order

Mencap (25 July 2012)	Additional strategy theme focused on the needs of the vulnerable, disabled and elderly.
Mencap (24 July 2012)	Housing needs of families with disabled children should feature in strategy documents.
Mencap Housing Sub Group Meeting (27 June 2012)	The group felt that compared to the last housing strategy, the profile of people with disability and Learning Disability seems to have diminished.
3	Reference to the initial impact on equality assessment: doc is all about filling the gap in the middle between the rich and the poor but instead causes more polarisation.
	The group are not comfortable with statements held within the impact assessment such as "housing officials will use their discretion to award community contribution" this is worrying. The group would request for this to be changed and that vulnerable people be exempt from this
	Michele would like to go to her local councillor and discuss the housing strategy as well as consult through the normal channels.
	Michele would also like to know what happens to people who are not a priority? The council have developed the LHC – this is an organisation who manage the housing for LBHF. How does this work. There is no clear picture of this for people who are not familiar with the system.
	Are people to be assessed constantly – if they no longer fit the criteria for their housing where will they go?
	The group make reference to the housing strategy 2007 where it states that re-housing solution services are to look at the needs of People with learning disabilities – does this still exist in new strategy? Is there still an accessible housing register?
Andy Slaughter MP	Huge shortage of affordable housing will not be helped by the housing strategy documents. Disagree with the stepping stone narrative of the strategy. Social housing only viable alternative for most. Security of tenure important, particularly for those who have had bad experiences in the PRS. Building more "truly affordable housing" is not presented as a solution.
	Challenges whether stopping people resident from outside the borough will make that much difference and will harm specific groups such as those fleeing violence.

Catalyst	Broadly supports the housing strategy approach. Wish to work with the Council on new low cost home ownership options. And would like to work with the Council on new regeneration schemes.
Octavia	Greater clarity about how need groups who have been traditionally housed by Registered Providers will be assisted in the future. Reference should be made to S106 in the strategy. RTB is referenced, but it is not clear how a replacement approach will work.
Peabody	Strongly supports overall approach. Comment the Council for their bold and exciting regeneration programme across the five transport hubs. Very concerned that proposals signal a move away from lower income or benefit dependent household need groups. Council should set out in more detail how it intends to strike a balance between aspiration and need. Third strand of the housing strategy should be more holistic. Attention should be given to supporting independent living and vulnerable residents. Reference should be made to employment and training for residents. Potential for shared services with other organisations should be explored. Council land and asset base could be used imaginatively to attract new investment.
Richard Owen (resident)	Strongly supports the objectives and the tools being used to deliver the housing strategy objectives. Considers the £40k income limit to be high. Assets of social landlords should be more actively managed.
H&F Disability Forum (27 July 2012)	Qualified approval for the housing overall strategy approach. Two major areas of concern. Firstly, will the Council be able to increase the availability of existing accessible and adaptable housing from existing social housing to meet demand over the next five years. Second, relates to the Council's strategy for increasing availability of new housing for disabled people depends on new lifetime homes with 10% at wheelchair accessible standard. This will help those who can access market or low cost home ownership housing. HFDF unsure that Affordable Rents will be affordable to disabled people who are assessed as not being able to work or can only work part time.
	Welcome the Council's support for Lifetime Homes Standard and 10% wheelchair accessible homes. Evidence needs to be provided that disable people can access home ownership / intermediate housing. Evidence needs to be provided that additional affordable/social rented (accessible and adaptable) housing isn't needed. Concerned that affordable housing derived from the current 40% target will be inaccessible to the disabled client group. Welcome the Council's commitment to improve housing management services, expecting service needs of disabled tenants and leaseholders to be improved. On HRA financial management, expect surpluses to be used to re-invest in existing council housing. Do not support disposals of council housing stock. Council should be transparent in its approach.
Centrepoint (18 May 2012)	Supports existing objectives but believes that prevention and eradication of homelessness should be added as a top priority. Disagrees with the blanket ban on applicants from outside the borough as many homeless people are displaced from their home borough and have very good reasons that cannot return.
LBHF	Email 26 - Clarifications/Comments on specific points.

Shepherds Bush HA	Strategic documents (i.e., all documents) considered to be council-centric and could focus more on the work of registered providers and other agencies. Would like a clear framework for engagement for Registered Providers to deliver new initiatives and fresh innovations that meet the needs and aspirations of existing and new households.
	Statements saying that the borough welcomes such innovations should be included. Availability of resources should be looked at jointly to meet borough needs and aspirations. Challenges whether a mix of housing provision is being delivered presently, as new affordable housing is primarily discount market sale or market rent: clearer statement needed on expectations on affordable housing and expectations of registered providers.

Housing Allocation Scheme

Consultee	Comment
Mayor of London (4 July 2012 Meeting – Meeting Note 30 July 2012)	GLA broadly content with the proposed strategy. Noted that the Council's intention to give greater allocations priority to working households which is likely to feature in the Mayor's own final Housing Strategy document. GLA is concerned about how the sub-regional scheme will operate and H&F will need to be clear how their proposed approach will work in practice with sub regional obligations. GLA expressed an interest in how the Council intends to award priority to different categories of ex-service personnel.
Housing Association Forum	Transparency in the operation of the system will be vital. HAs concerned that the system could be more time-consuming. Vital that homes available for nomination do not remain empty longer than they need to be. 14 calendar day turnaround is required for performance purposes. Needs to be stronger focus on addressing under-occupation. Agreed that financial incentives need to be introduced to help encourage people to move. £500 per room was suggested as current practice. HAs mentioned a removal project that had been sponsored by HAs in the past which could help people move. Tri-borough working could also help improve joint working as many HAs in H&F also work in Westminster and K&C. Agreed that HAs have a key role to play in helping to delivering a better housing allocations approach.
LBHF (26 July 2012)	Reference needed to ensuring that greater joint working is needed between Housing Regeneration Directorate and Adult Social Care (ASC) on future allocation processes. Greater priority should be given to those in housing need where ASC are currently providing support.
Consideration of recent CLG Guidance / Proposals	CLG Allocations Guidance of Accommodation – Guidance for Local Authorities. CLG Pay to Stay Consultation Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012
Hestia	Concerned that the documents do not adequately address the housing needs of vulnerable adults and children. Highlighted issues of inconsistencies and contradictions. Timely assessment and interventions will help pre-empt expensive, temporary solutions. Women and children suffering from domestic may suffer from the proposals.
Mencap (24 July	Amend bedroom standard to reflect the need for all disabled children to have a separate bedroom from other

2012)	children in their household.
Mencap (25 July 2012)	Greater consideration for people with learning disabilities. Combined NHS and Council spending on residential care for people with learning disabilities could be far better spent through a strategic approach. Parents with disabled children more likely to be badly housed. Should be an exemption for disabled people regarding the community contribution.
Mencap Housing Sub Group Workshop	How do the council support people who want to buy properties and don't have support workers?
	Some people don't read – therefore having to re-do forms every two years would be problematic, would people with LD be exempt from this EOC states that most people with LD would have a flexible tenancy for 5 years- is this correct?
	Under the new allocations scheme 50% of council and housing association properties would be at affordable rent, is this correct?
	Using welfare panels to take into account need (bedroom categories) will make re-housing easier in the long term.
	The group felt that paragraph 7 of the draft allocation scheme document was insulting because it asserts that people with learning disabilities do not contribute to the community. We would recommend a clear statement as to who is accredited to the community contribution.
Fulham Community Partnership Trust	Five questions relating to how the volunteering element of the Scheme will work in practice. Supportive of the principles, but clarification on operation sought.
Andy Slaughter MP	Concerned about ending use of the CBL approach. If this is to be done, then the Council should take great care to ensure offers are appropriate. Succession change will be a hindrance to community cohesion and stability. Questioned whether the £40,200 p.a. income ceiling was appropriate and how (if at all) it tallied with the Council's interim rent policy (5 Sept 2011). Questioned whether the community contribution approach was fair on vulnerable households who may not be able to make a contribution.
Notting Hill Housing Trust	Supports verification at registration of application; request transparency on how nominee has been prioritised; requests standard verification form for H&F to complete. If direct nominations are to be adopted, NHHT make recommendations on how they might want the system to be operated to take account void timescales.
Catalyst	Broadly support the housing allocation scheme.
Octavia	Concerned about the impact of the new additional preference groups and want to see how assessments will be consistent. Concerned that CBL will lead to a slow down in re-lets. Welcome a number of the changes: realistic

	approach to available housing options; verification on application; requiring applicants to update applications.
Supporting people Providers Workshop (17 July 2012)	Supported housing providers recognise the value of their service users engaging in meaningful activities such as voluntary and charitable work, education or paid work in their recovery and journey to more independence. Giving additional priority to individuals who are making a community contribution will reinforce the positive reasons. Due to the vulnerability of many residents in supported housing, providers seek reassurance that the definition of community contribution will be applied flexibly and that we recognise that individuals do not start from the same positions or have the same capacities or capabilities. A contribution that might seem insignificant to one person might represent a huge achievement for another.
	Providers welcome the fact that the draft housing allocation scheme indicates an ongoing commitment to providing a source of move-on accommodation for people in supported housing. There is some concern however, that making a distinction between those who do and don't make a community contribution could lead to a "silting up" of valuable supported housing resources if, for example, move on is slowed down for individuals who no longer need to be in supported housing but are not making a community contribution but have nonetheless made significant progress. This could have an unintended negative impact for the council.
	Some concern was expressed about the potential loss of access to sub-regional housing units currently available on Locata. This can be a useful source of move-on for some people in supported housing.
HAFD (27 July 2012)	Wants reassurance that properties available through the Accessible Housing Register (AHR) will be linked to the 'property pool' approach. Refers incorrectly to absence of mention of the AHR in the Draft Scheme where it is referenced in section 4.27. Welcomes the move to the Assisted Choice approach and use of discretion.
Centrepoint (18 May 2012)	Concern about ending use of choice based lettings. Concern about limiting young people's housing offers to two and consider that affordability of offered accommodation should be a key consideration. Supports the principle of giving priority to households making a community contribution, but believe greatest housing need should be the first consideration. People with multiple and complex needs will community contributions such as education and training and volunteering as unachievable goals. Officers should have discretion over younger people's cases, particularly where they are resident in supported housing. Do not believe that ex-offenders should be prevented from receiving offers of housing as this may increase the chance of re-offending. A higher cap of rent arrears than the current £100 proposed should be adopted as this can be the gap caused by a delayed HB payment.
Shepherds Bush HA	Would like to see current use of Locata retained with use improved. Will need to review whether proposal to allocate from the Homebuy Register (who don't meet the reasonable preference criteria) to social housing conflicts with their own allocations strategy.

Tenancy Strategy

Consultee	Comment
Mayor of London (4 July 2012 Meeting – Meeting Note 30 July 2012)	GLA broadly content with the draft strategy and had no comment to make on the fixed terms and rent policy set out in the document.
Housing Association Forum	HAs concerned about how their own tenancy policies can be aligned with the Council's proposed approach. The Council is proposing 5 years as a norm with 2 years in exceptional circumstances.
	Agreed that HAs should have regard to the Tenancy Strategy (in line with legislation), but wouldn't by default have to follow individual borough strategies in detail. However, it was suggested that the Council's proposed approach was not overly onerous with some HAs already adopting five year fixed terms already.
Notting Hill Housing Trust	Supports the Council's approach to tenancy renewals; supports Council's approach to succession; have advised the Council on NHHT's own rent caps for 2012/13 which are within the Council's ceiling rents. Council proposed tenancy lengths and tenancy types vary from those adopted by NHHT and do not propose to align their policies with those of the Council.
Catalyst	Catalyst has adopted a cautious approach to rents and is concerned about affordability and collectability in light of welfare reforms. Highlights that the Mayor's Office has advised that rents should be set in accordance with their contracts with the HCA (and now GLA) and suggests that the H&F should not specify rent levels. Catalyst is using five year fixed term tenancies (plus one year fixed terms); lifetime tenancies for sheltered and supported housing. Will only use 2 year tenancies in exceptional circumstances. For five year tenancies, a presumption of renewal except in specified circumstances.
Shelter	Two year tenancies need to be granted under exceptional circumstances: unclear why being 18-25 years old should be considered exceptional. Discretion should be given to grant 5 yr tenancies for those who have demonstrated an ability to live independently. Questioned whether a two year fixed term tenancy for economically active households will achieve the set objective.
Hestia	Ladder of Opportunity needs to be extended to those who need a second opportunity. Ladder of Opportunity needs to be extended to those who need a second opportunity. Definitions needed for special housing and/or health needs. Correct (or clarify) 'unfinished question'. Ladder of Opportunity needs to be extended to those who need a second opportunity.
Andy Slaughter MP	Questioned the rationale for fixed term tenancies and whether they would alleviate the problems that the strategy identifies. Tenancy renewals will create uncertainties for the families concerned. Longer notice than 2 months needs to be given to households who are expected to move. Ex offenders need greater support from the Allocations

	Scheme.
Octavia	Octavia have yet to take a position on fixed term tenancies and reserves its position on whether it intends to follow what the council sets out in its document. Seeks clarification on whether the Strategy proposed fixed terms are intended to apply to housing associations. Income thresholds, and rationale for, should be made clearer. Highlights that HCA contracts have already been signed and therefore difficult for the Council to influence what rents should be charged. Octavia will be paying regard to the likely impact of the welfare reforms in its approach.
Peabody	Peabody has adopted five year fixed term (with one year AST starter tenancy) for all Affordable Rent properties with a commitment to renew unless certain issues have arisen, e.g., overcrowding, breach of tenancy etc. Starter tenancies introduced for all social rent lettings. Peabody questions whether the Council is striking the right balance between meeting need and choice. Question whether the two year tenancy approach meets the exceptional criteria. Questions whether identifying young people. Starter tenancies can be more effective in addressing tenancy sustainability issues. Greater clarity on what level of income is required to prompt an encouragement of a tenant to move out of social housing.
A2 Dominion	Welcomes the fact that the Council has set out its strategy principles, priorities and expectations of Registered Providers, which will help inform their own approach. A2 Dominion is considering as a pilot fixed term tenancies for 3 BR homes which will be five years with a one year starter tenancy. Existing social housing tenants and those over retirement age will be granted lifetime tenancies.
Network Group	Network policy is to use 5 year fixed term tenancies, but continue to use lifetime tenancies in certain circumstances. Affordable rent polices only to be charged on 1BR and 2BR properties. 80% of re-lets charged at affordable rents, with remainder charged at social rents.
Old Oak/Family Mosaic	Old Oak / Family Mosaic are in the process of introducing five year tenancies, with one year probationary tenancies. No intention to introduce two year tenancies. Affordable Rents will be charged in line with their charitable objectives and will have regard to welfare reforms. Wish to keep their rents as affordable as possible.
HFDF	Welcome support for secure/assured tenancies for disable tenants and commitment to retaining accessible and adapted housing. Care needed to ensure that prospective tenants can pay Affordable Rents. Additional revenues from Affordable Rent should not be used only for new low cost home ownership housing.
Aspen Gardens TA (25 July 2012)	Gravely concerned that granting of five year tenancies will have on community sustainability and discourage tenant involvement. Biggest problems on the estate come from tenants who are renting short term.
Centrepoint (18 May 2012)	Initial tenancy length of 5 years is reasonable for most formerly homeless. Longer tenancies should be granted to those with most serious and entrenched needs. Strongly disagrees with proposal to limit tenancies to two years for 18-25 year olds and do not see this as being an 'exceptional' circumstance as per CLG Guidance. If this is retained, the council should consider giving young people with additional needs priority for 5 year tenancies.

Stoll Foundation (17 July 2012)

It would be inappropriate to distinguish between differing members of the Armed Forces as they are all making a considerable community contribution and to disentangle who made more would be difficult and hard to justify. I do not think it would be in the spirit of things to have a less deserving ex-serviceman or woman if, for instance they had not been in combat or had not been on a tour of Afghanistan. There is also the issue of length of service which has not been considered. Will there be a discrepancy between full-time service personnel and reservists? This is especially pertinent as the Armed Forces evolve in coming years. With limited housing stock, if H & F are going to make a tangible difference in terms of serving personnel then they should source accommodation from Stoll and this should be through a formal agreement, preferably names within the Allocations Scheme. There is an issue we have already spoken about whereby those who have lived in the Borough for 6 months prior to service will qualify for a community contribution but may not get a local connection. Housing have to give advice and assistance under the 2002 Act and Veterans have access to considerably more free resources than civilian personnel and there should be a conduit to Stoll and support services through the housing team.

Mencap Housing Sub Group Meeting (27 June 2012)

Concern about the format and writing style and whether people with learning disabilities can understand what is being proposed.

Concern expressed about the fixed term tenancy and how this would work for people with Learning disabilities. It does state that proposed tenants who have special housing or health needs should be granted secure or assured tenancies. How will special housing or health need be evaluated? Who will do this? Will it be part of the existing health questionnaire that doesn't make provision for people with Learning Disabilities in the first instance?

The community contribution again came into question. The group feel that people with Learning Disabilities and profound needs and autism should be exempt from this from the outset. How will community contribution be evaluated? What if the person is unable to volunteer because of their disability or impairment? What about other ways they may contribute, will these go un-noted?

The ladder of opportunity seems to have no real relevance to people with Learning Disability and it is worrying that the proposed housing strategy will no longer be based on need but aspiration.

It is also a worry that in paragraph 5.5 it states that if a disabled person no longer lives within a property, which is adapted, that the council are obliged to move the remainder of the family out. This means that if a family have lost their cared for person, they will also lose their home. Although the group understand this, how will it be done?

Paragraph 5.9 states that local authority rent levels are likely to change following the implementation of the housing revenue account self financing regime. Will this be in line with council tax caps?

The overall concern is that the does not seem to be any /or very little mention around people with disabilities and learning disabilities. There are 1.5 million people in London with some sort of impairment and by the nature of disability it is a certainty that we are talking about 1.5 million different impairments, however this strategy only seems to make reference to those who use wheelchairs, why?

People with learning disabilities needs are perceived to being overlooked. Systems in place are already failing and with the new strategy being implemented it will only get worse for her and people in her situation.

Supporting people Providers Workshop (17 July 2012)

Some queried whether making a distinction between the length of the fixed tem tenancy for most 18-25 yr olds and those who were previously in the care of the local authority and entitled to receive services under the Leaving Care Act, might act as a perverse incentive for more homeless 16/17 yr olds to opt to be accommodated under S.20 of the Children Act, than is currently the case?

Many vulnerable people are likely to need help to submit their tenancy renewal. It will be essential that there is the appropriate help and support available to prevent possession proceedings being instigated. There will need to be checks and balances in place to ensure vulnerable people do not lose their accommodation solely because they are not in a position to complete the form by required deadlines e.g. if they are in hospital. It will not be in anybody's interest to progress possession proceedings simply because an individual has not been able to complete the form in time.

Many vulnerable people will feel anxious and alarmed at the prospect of their tenancy not being renewed and therefore it will be essential to communicate information accurately and sensitively. We must be careful not to unduly worry people, who are adhering to the terms of their tenancy, that their tenancy is at risk.

Homelessness Strategy

Consultee	Comment
Mayor of London (4 July 2012 Meeting – Meeting Note 30 July 2012)	GLA broadly content with the proposed strategy. GLA wished to see inclusion of requirements on quality of private rented accommodation, as set out in the recently published CLG Homelessness (Suitability of Accommodation) (England) Order 2012 consultation document. LBHF agreed that this should be included. GLA also wish to see reference to the Mayor's rough sleeping reduction targets. GLA referenced its support for direct housing benefit payments to private landlords who are accredited. H&F acknowledged the rationale for such an approach, but given the demand for private rented accommodation in the borough, it was unlikely that such an approach could be adopted. The Council is supportive of the Mayor of London's target whereby no-one should spend more than one night rough sleeping, and supports initiatives such as No Second Night Out' that will assist meeting this objective.
Housing Association Forum	HAs keen to see more examples of existing good practice.
Shepherds Bush HA	Reference to needs of rough sleepers needs to be made and related issues of complex medical needs that requires specialist provision need to be considered. Homelessness approaches are likely to increase and therefore supply needs to be planned for.
Consideration of recent CLG Guidance / Proposals	CLG Homelessness Order Consultation
Shelter	Need to monitor consequences where the discharge duty has been accepted and then a decision review overturns the allocation on suitability grounds. Need to consider financial consequences of tenant entering a 12 month tenancy which is accepted as unsuitable by the local authority. Authority has a choice as to whether discharge into the PRS: needs to consider whether this will be appropriate for specific cases, e.g., disabled applicant need adaptations.
Homelessness Strategy	Does not support use of PRS housing outside the borough. Displacement of households from family, friends, networks etc. creates huge family costs. Vulnerable single people who have been homeless and are accommodated in the PRS are more likely to return to hostel accommodation. Does not agree that there is a perception that a homelessness application is a quick route to obtain a social housing tenancy.
Catalyst	Broadly support the strategy.
Octavia	Would like to understand more the work of the HB Assist Team and its impact. Issue of 'silting up' in hostels of

	applicants who are ready for independent living need identified measures/ interventions. Impacts of changes in Supporting People funding need to be considered. More reference to the work of Registered Providers needs to made.
Centrepoint	Appropriateness of allocating homeless young people to PRS housing outside the borough will depend the location and circumstances of the person involved. Transport costs a key consideration. PRS housing is not suitable for everyone and that existing research indicates that such tenants in PRS are twice as likely to return to hostels or the streets than those allocated to social housing tenancies. Tackling 'perverse incentives' to seek a social housing tenancy should not be to the detriment of genuine homelessness cases.
Mencap Housing Sub Group Meeting (27 June 2012)	The documents were not specific enough with regards to possible exemptions for certain groups from the stated strategy e.g. would there be any exemptions for people with Learning Disabilities in the case of fixed term tenancies?
	Disability is broadly mentioned but it is done so in a general way, which does not necessarily take into account the actual needs of people with Learning Disability. More focus needed on the varying groups that fit into the disability category. The strategy simply refers to 10% of people using wheel chairs, what about everyone else?
	Groups and individuals have been working towards increasing awareness of the needs of people with Learning Disabilities so that, for example, housing officers and council officials can improve the services offered to people with Learning Disabilities. These advances were not apparent in the document overall. No real recognition of Learning Disabilities or their specific needs; if there is no recognition in the documents then this will be reflected in day to day practice.
	By not considering people with Learning Disability more closely there is the possibility of policy change that could be positive impacting negatively e.g. The community contribution: People with LD contribute positively to our community in a number of different ways, but, if the criteria for what contribution to community actually is, is too rigid (20 hours a month), then they may miss out on these benefits. A more flexible approach to people with LD needed.

Housing Strategy Annex

Consultee	Comment
LBHF Planning	Corrections/Update
LBHF Performance and Information	Corrections/Update

Equalities Impact Assessment

Consultee	Comment
Mencap	Seeking an independent EqIA to be undertaken.
HFDF (27 July 2012)	Greater attention and evidence needed for the EqIA. Helpful guidance given on where additional information and guidance is required.