

The Common Housing  
Register Allocations Policy Consultation

Summary of Responses

## **1. Introduction**

- 1.1. Peterborough City Council is required by law to have a housing allocations scheme which shows how the council prioritises applications for housing and the procedures they follow in allocating those homes.
- 1.2. Although the council no longer owns or manages any social housing in the city it has existing agreements in place with 10 registered social landlords (RSL), which allows us to allocate their available properties.
- 1.3. The Localism Act 2011 made an amendment to the Housing Act 1996, which gave local authorities the power to set their own qualifying criteria for people who are allowed to join the housing register. This allows councils to restrict their housing register to allow entry to only those who are in the most urgent housing need as well as allowing exclusions for other reasons based on other locally set criteria.
- 1.4. Additionally, councils have the power to frame their allocations policies to give additional preference to particular groups of people. The guidance recommends councils consider how they can use their allocation policies to support those households who want to work, as well as those who, while unable to engage in paid employment, are contributing to their community in other ways, for example, through voluntary work.
- 1.5. The Homeless Reduction Act (2017) also requires Local Authorities to shift their focus to preventing and relieving homelessness. Allocating social housing is one of the tools used to prevent and relief homelessness and so it is essential that the Allocations Policy supports this.
- 1.6. On 31<sup>st</sup> August 2021 we launched the public consultation. A consultation questionnaire was published on the council website and promoted through various internal and external communication channels. Additionally, three consultation events were held; two specifically for Registered Provider partners and internal and external colleagues. We also held an evening consultation event for the public. Except for one document which was received from a Registered provider, all feedback was submitted via the consultation questionnaire.
- 1.7. The consultation process ended on 22<sup>nd</sup> November 2021.
- 1.8. We have now considered all the responses received. Chapters 2 & 3 of this document summarise the responses to the consultation. Chapter 4 highlights any changes or additions to the proposed policy in light of the consultation responses.

## **2. Summary of Responses**

- 2.1. In total we received 154 responses to the consultation. These were from representatives from our partner housing associations; other departments in the council; professionals working in a housing field and members of the public.

### 3. Responses to questions

#### Question 1:

Are you responding to the questionnaire as:

Private Rented Sector Tenant	31	Resident of Peterborough	69
Representative of a Registered Provider	2	Social Housing Tenant	35
Professional Capacity	12	Other	4

Those responding as other stated that they were:

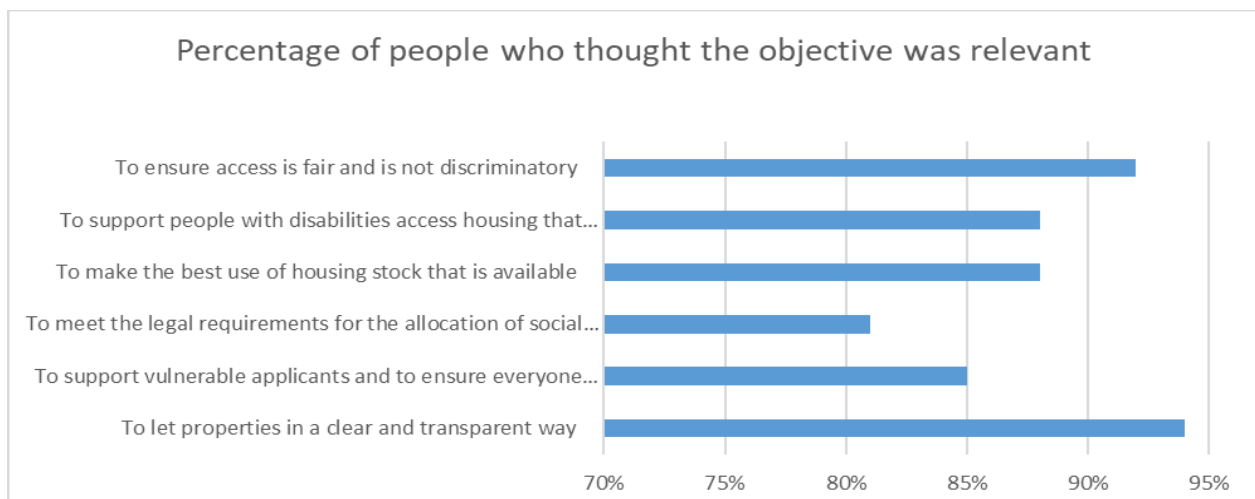
- Homeless in the next few months
- In temporary housing
- Out of area but a domestic violence housing register applicant
- Privately renting but on the housing register

### OBJECTIVES

#### Question 2:

To ensure the policy remains relevant for residents and our partners, please indicate your opinion on the relevance of our proposed objectives:

- To let properties in a clear and transparent way
- To support vulnerable applicants and to ensure everyone in need has a pathway to access social housing
- To meet the legal requirements for the allocation of social housing as set out in the Housing Act 1996 (as amended) and statutory guidance
- To make the best use of housing stock that is available
- To support people with disabilities access housing that can reasonably be adapted for their needs
- To ensure access is fair and is not discriminatory



## Respondent Comments

*“There should also be an opportunity to review the house allocated to a family if circumstances change - while this may be upsetting and difficult and would need to be approached sensitively, it is important that those most in need are catered for” - Resident of Peterborough*

*“Social housing should only be for those who could otherwise struggle to secure privately rented accommodation for various reasons such as disability needs, affordability etc. I disagree that it should be accessible to everyone” - Resident of Peterborough*

## LOCAL CONNECTION

### Question 3:

Do you believe that someone should have to reside in Peterborough for longer than 6 months to acquire a local connection regardless of a family connection?

Currently a local connection is established if -

- the applicant or a member of their household has resided in the council’s district for 6 months out of the last 12 months, or 3 out of the last 5 years and that residence is or was of their own choice, unless the reason that they came to the district was to attend an educational establishment; or
- the applicant or a member of their household works in the council’s district full- or part-time; or
- the applicant or a member of their household has immediate family (parents, children, brothers, sisters and other family members if there is a particularly close relationship) who have lived in the district for at least the previous 5 years; or
- there is a need for the applicant or a member of their household to be housed in the district because of special circumstances (special circumstances might include the need to be near special medical or support services which are available only in the council’s district).

### What we are proposing

We propose to remove the category which provides those who have resided in Peterborough for over 5 years additional preference. This would mean that they would be considered for accommodation before someone whose application was not awarded additional preference.

Additional preference categories we included in the draft policy are households who can demonstrate:

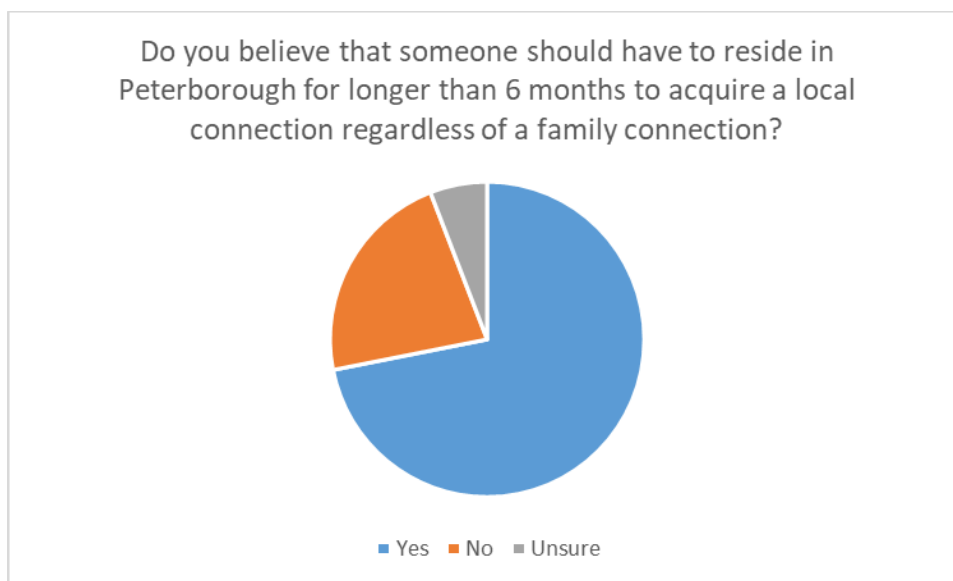
- i. they have a commitment to and contribute towards the economic growth of the council’s district as working households.
- ii. they make a significant impact by their contribution to their local community, or
- iii. they are a former member of the regular forces (where the application is made within 5 years of discharge).
- iv. They are owed a homelessness duty (prevention, relief or main duty under Part VII of the Housing Act 1996 (as amended by Homelessness Reduction Act 2017) and have a local connection to Peterborough.
- v. they are entitled to a reasonable preference and have urgent housing needs and:

- a) they are serving in the regular forces and suffering from a severe injury, illness or disability which is attributable (wholly or partly) to their service;
- b) they formerly served in the regular forces;
- c) they have recently ceased, or will cease to be entitled to reside in accommodation provided by the Ministry of Defence following the death of their spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service; or
- d) are serving or have served in the reserve forces and are suffering from a severe injury, illness or disability which is attributable (wholly or partly) to their service.

**Why are we making this proposal?**

Local connection criteria would remain in the policy which reflects the criteria in Homeless legislation. This would mean that applicants would still need to have a connection to Peterborough to be considered a qualifying person.

The other categories relating to additional preference meant that often the 5 years continuous residence criteria was not relevant as the household would qualify as they were working and making a contribution to the local economy.



- 81% of respondents agreed that someone should have to reside in Peterborough for longer than 6 months to acquire a local connection regardless of family connection.

Although it is clear that those responding to the consultation strongly believed that local connection criteria should be tightened, we do not believe that we should adopt the change in the local connection criteria. This is because the council could find itself in a position where we have a housing duty to a homeless household, but we are unable to discharge that duty as the household do not meet the eligibility criteria to join the housing register. This would leave the council open to increased costs relating to that households stay in emergency accommodation and possible judicial review or county court appeal.

## Respondent Comments

*"I think it's a bit outdated. Living and working is more transient these days so I don't really know why someone would need to have a local connection. Perhaps it could be used to prioritise but not a pass/fail type thing"* - Private rented sector tenant.

*"Only in exceptional circumstances should 6 months be enough otherwise they are jumping up the list and depriving those with stronger connections"* - Private rented sector tenant.

*"Would like to see priority given to people who have family in Peterborough and or have lived here for a long time (eg born here and grew up here) so that family relationships can stay strong"* - Resident of Peterborough.

While the overriding response from the public was that we should be giving additional preference to local people, our experiences since the previous change in the policy has meant that there are few households who qualify for additional preference, would not qualify for one of the other additional preference categories.

In addition, we want to promote additional preference for those who are making a positive contribution to the city through work, volunteering or serving our country this priority is somewhat watered down if a household who is not making a contribution to the city are awarded the same priority simply because they have lived here for over 5 years.

We have also had situations where households in the most need have waited too long for properties as they have been homeless or had significant health needs, but were being considered behind those who are not in as much need, but have lived in Peterborough for longer, which is unreasonable.

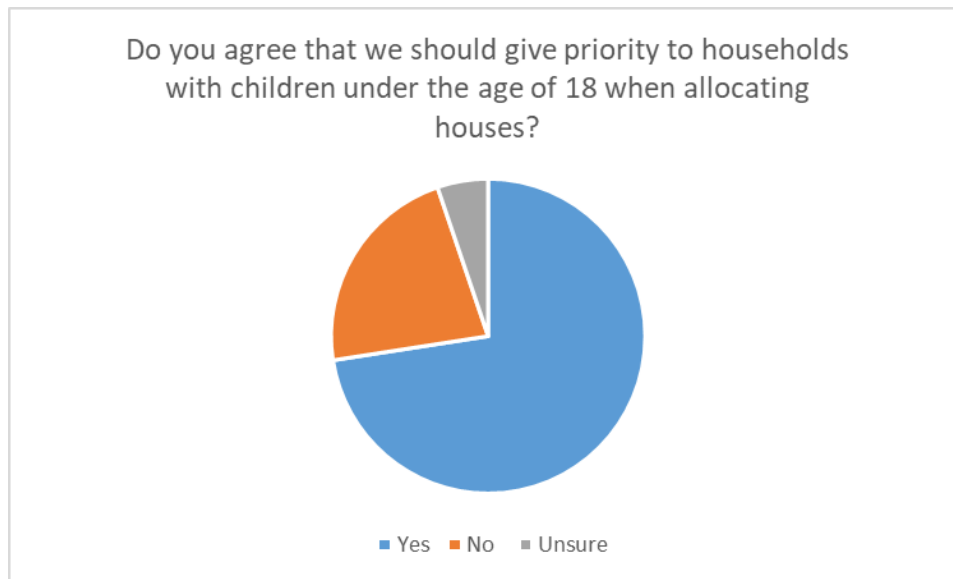
## BANDING AND PRIORITY

### Question 4:

2-bedroom houses are in high demand and in short supply. Do you agree that we should give priority to households with children under the age of 18 when allocating houses?

### What we are proposing

One of the proposed objectives is to make the best use of housing stock. We believe that we can help to achieve this by ensuring families with young children are prioritised over those with adult children for houses. Those families with adult children will be able to bid for flats and maisonettes and have the same priority for houses.



- 73% of those responding to the survey agreed with this proposal.

**Question 5:**

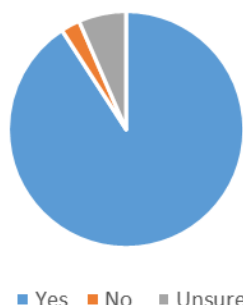
To ensure that adapted properties go to those who most need them, do you agree that properties which have high level adaptations (such as stair lifts, through floor lifts, bungalows, hoists etc) should be directly allocated to those who have been assessed as needing those adaptations?

**What we are proposing**

Currently all properties are advertised through the Choice Based Lettings system. This allows anyone who meets the criteria for the property to be able to express their interest through a bid. Although this is the most transparent way of allocating properties, it does mean that for those very few highly adapted properties which become available, may not be allocated to those households who we know have the most need for that type of property.

We propose to change this so that we run a shortlist on the system of applicants who have had their medical needs assessed and put applicants forward who have the most need for that type of accommodation. Applicants will be put forward in band, band date and additional preference order, exactly like how normal shortlisting work. By working this way, we will ensure that we make best use of housing stock and support people with disabilities access housing that can reasonably be adapted for their needs.

Do you agree that properties which have high level adaptations (such as stair lifts, through floor lifts, bungalows, hoists etc) should be directly allocated to those who have been assessed as needing those adaptations?



- 91% of those responding agreed that properties with high level adaptations should be directly allocated to those who have been assessed as needing those adaptations.

#### **Question 6:**

Do you think that it would be beneficial to reduce the number of bands to make the system easier to understand?

#### **Why are we making this proposal?**

There are currently 5 bands and applicants who are qualifying to be on the housing register will be placed in one of the categories within one of the 5 bands according to their housing circumstance. In order to make things simpler, we propose to reduce the number of bands from 5 to 3.

54% of respondents believed that we should reduce the number of bands to make the system simpler.

#### **Question 7:**

How far do you agree with these statements:

- Those who are under occupying and moving to sheltered accommodation should be given band 1 priority.
- A multi-agency panel should agree who is ready to move on from supported accommodation settings.
- Band 1 should be kept very small in order to ensure those in this band are re-housed very quickly.
- Those who have the most urgent need of re-housing should be entitled to one suitable offer of accommodation.

#### **What we are proposing**



**Those who are under occupying and moving to sheltered accommodation should be given band 1 priority.**

As part of our objective to make best use of housing stock, we need to ensure that we encourage those people who are under occupying social housing to move to accommodation which meets their needs. Sheltered or retirement housing is less desirable in the city and often goes to clients in a lower band. We propose to support those who are under occupying accommodation and who could move to sheltered accommodation by awarding their application band 1. This would free up a property for someone who is living in overcrowded accommodation.

- 68% of respondents either agreed or strongly agreed with this proposal.

**A multi-agency panel should agree who is ready to move on from supported accommodation settings.**

In the past 6 months we have developed and implemented a successful Supported Housing move on panel. This panel comprises representatives from all the supported accommodation settings as well as Registered Provider partners. Anyone who resides in Supported Accommodation who is ready to move on is brought to the panel so that agreement can be made to award band 1 and whether any floating support is needed for them to live independently. We propose to change the Allocations Policy to reflect this way of working and ensure that only those who have been through the panel are able to apply on the housing register. This will prevent people from being housed in independent accommodation when they are not ready and then potentially failing because they still require a level of support. The aim is to reduce the revolving door of homelessness and ensure that when people move into independent accommodation, they are doing so because they are ready for it.

- 83% of respondents either agreed or strongly agreed with this proposal.

**Band 1 should be kept very small in order to ensure those in this band are re-housed very quickly.**

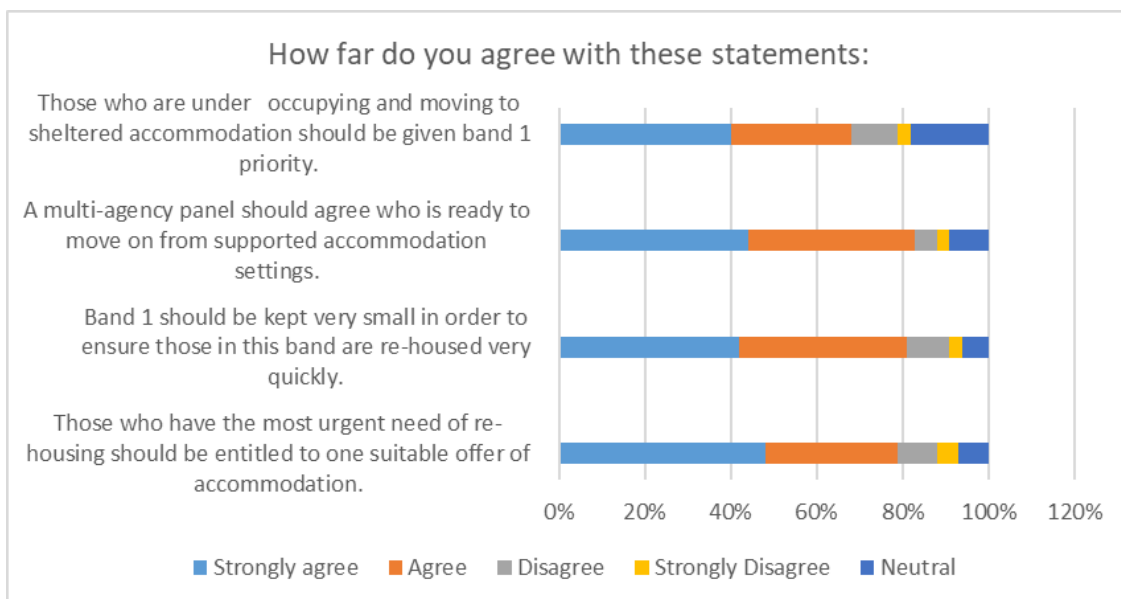
As explained earlier, demand undoubtedly outweighs supply and for general needs accommodation, only those in the highest need will be made an offer of social housing. We propose that Band 1 should be kept for those in the highest need to be re-housed. This will mean that those in band 1 should be made an offer of accommodation in a shorter time frame if a property which meets their needs becomes available.

- 81% of respondents either agreed or strongly agreed with this proposal.

**Those who have the most urgent need of re-housing should be entitled to one suitable offer of accommodation.**

We are proposing that applicants in the most urgent housing need including both, applicants in band 1 and those who are Accepted as Homeless (Band 3) will only be made 1 offer of suitable accommodation. If this offer is refused then their application will be suspended for a period of 12 months and their homelessness priority may be ended. After 12 months, assuming they still have a housing need, they can re-apply on the Housing Register. We have recognised that those in band 1 are in the most housing need and so we need to ensure that they are provided with a suitable offer as soon as possible.

- 79% of respondents either agreed or strongly agreed with this proposal.



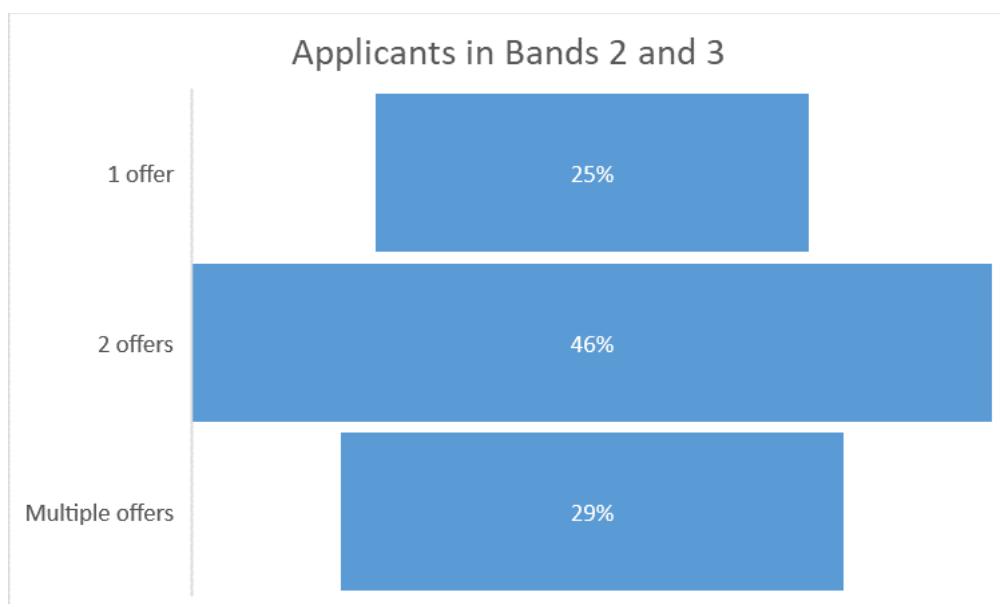
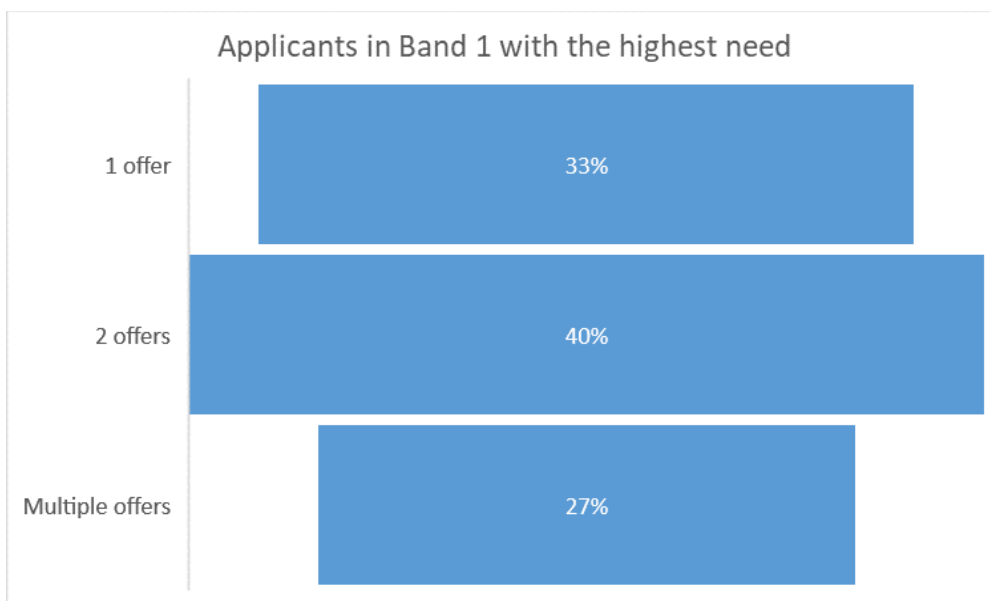
**Question 8:**

How many reasonable offers of social housing should an applicant be entitled to?

**What we are proposing:**

Applicants in the most urgent housing need including both, applicants in band 1 and those who are Accepted as Homeless (Band 3) will only be made 1 offer of suitable accommodation. If this offer is refused then their application will be suspended for a period of 12 months and their homelessness priority may be ended. After 12 months, assuming they still have a housing need, they can re-apply on the Housing Register.

Applicants in bands 2 and 3 will be considered for a maximum of 2 offers of suitable accommodation. If an applicant refuses 2 suitable offers of accommodation their application will be suspended for a period of 12 months. After 12 months, assuming they still have a housing need, they can re-apply on the Housing Register.



Although the majority of those consulted agreed that applicants should be given 2 or more offers, Homeless legislation sets out what constitutes an offer and at what point we can end our duty should an offer be ended. With social housing being such a scarce resource, we do not have the ability to make more offers than what our statutory obligations require. Additionally, we need to be encouraging those who we have recognised as having the highest housing need to accept an offer of suitable accommodation to enable them to resolve their housing situation.

**Question 9:**

We propose to award higher priority to those who are current Peterborough Homes tenants and are under occupying properties in the highest demand as follows:

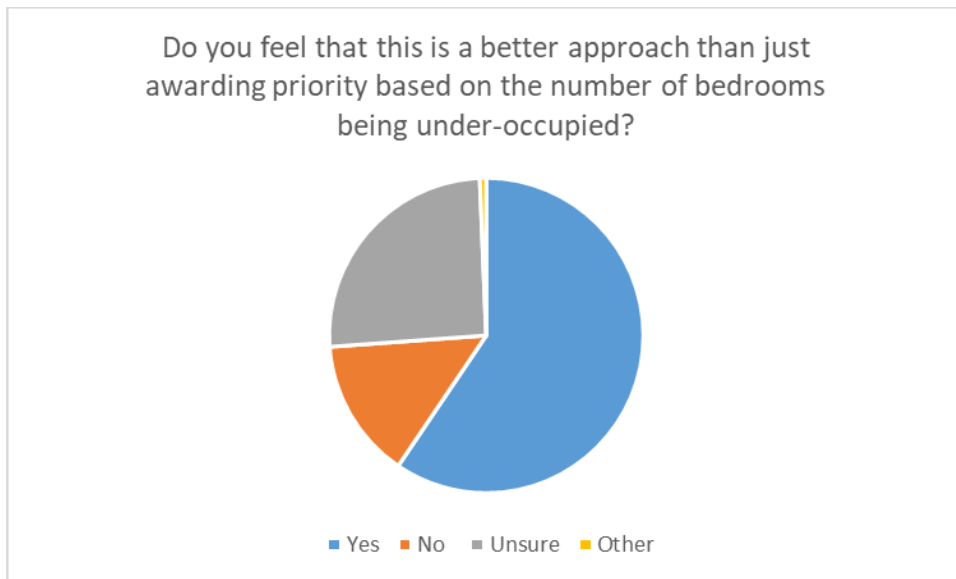
High Demand – Band 1	Low Demand – Band 2	No Demand – Band 3
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2-bedroom houses	2-bedroom flat	2 bedroom sheltered flats
2-bedroom bungalows	2-bedroom maisonettes	
4-bedroom houses	3-bedroom maisonettes	
5-bedroom properties	3-bedroom houses	
6-bedroom properties		

Do you feel that this is a better approach than just awarding priority based on the number of bedrooms being under-occupied?

**What we are proposing**

Currently, everyone who is under occupying a Register Provider property is awarded band 1. In order to try and keep band 1 for those who are in the most urgent housing need whilst balancing the need to encourage those who are under occupying properties to move; we propose that we award priority dependant on how much demand is for the property that they are residing in.



**Respondent Comments**

*“Banding should be straightforward”* - Private rented sector tenant

*“When allocating adapted housing ensure it goes to families/individuals that need it and not just on the number of bedrooms”* - Social Housing Tenant

**HOMELESSNESS**

**Question 10:**

Should the council prioritise those on the Housing Register who agree to work with us to prevent their homelessness?

**What we are proposing**

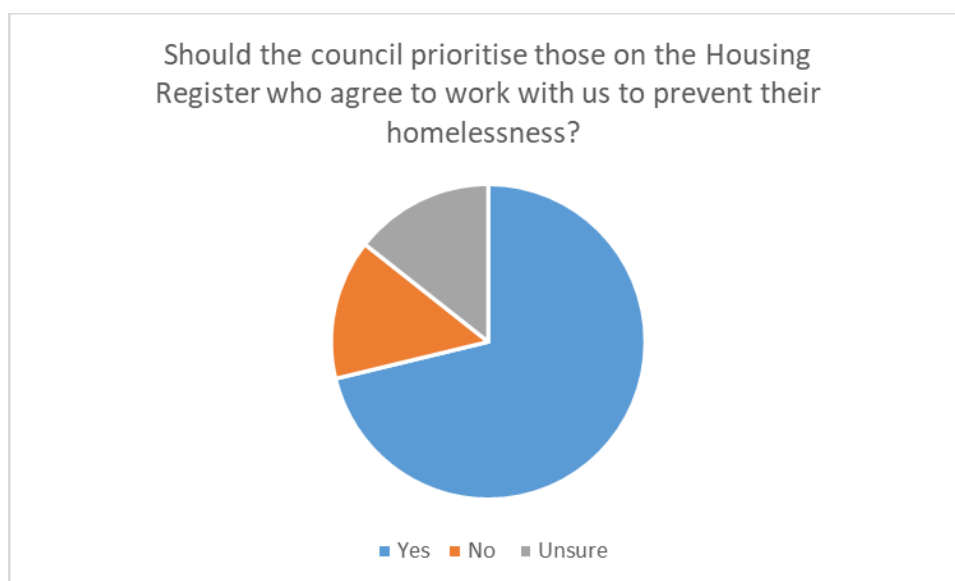
There are 3 different pathways for those who become homeless:

1. Those who are threatened with homelessness, known as the **prevention stage**. Clients can be in this prevention stage for up to 56 days or for their entire notice period if they are renting. During this time, we will support them by advocating for them to remain in their current accommodation or finding alternative accommodation before they become homeless.
2. Those who are homeless and do not have any other accommodation for their occupation, known as the **relief stage**. Clients can be in this relief stage for 56 days where we support them in finding alternative accommodation.
3. Those who are homeless and the 56 days in the relief stage has come to an end, known as the **main duty decision stage**. This decision considers whether the client is eligible, homeless, priority need, intentionally homeless and has a local connection, as per the Homeless Legislation.

Homelessness has harmful effects on households and where possible the council wants to prevent it from happening in the first place. The homelessness legislation is there to provide a safety net for households who are left with no alternative. It should not be considered as a housing option. Homelessness is not a route into social housing, and we will primarily be exploring options in the Private Rented Sector.

The Councils primary focus is on keeping people in their homes for as long as possible or by moving households to alternative accommodation before homelessness arises. We propose to give higher priority to those households who come to us early and work with us to prevent their homelessness. This will reduce the number of households entering temporary accommodation and encourage households to explore other options such as mediation, to enable them to remain in their current accommodation.

Applicants who present to the council as homeless or threatened with homelessness within the next 56 days, will be assessed to determine whether they are owed a homelessness duty under the Housing Act 1996 Part VII (as amended by Homelessness Reduction Act 2017).



- 71% of respondents agreed that we should prioritise those on the Housing Register who agree to work with us to prevent their homelessness.

**Question 11:**

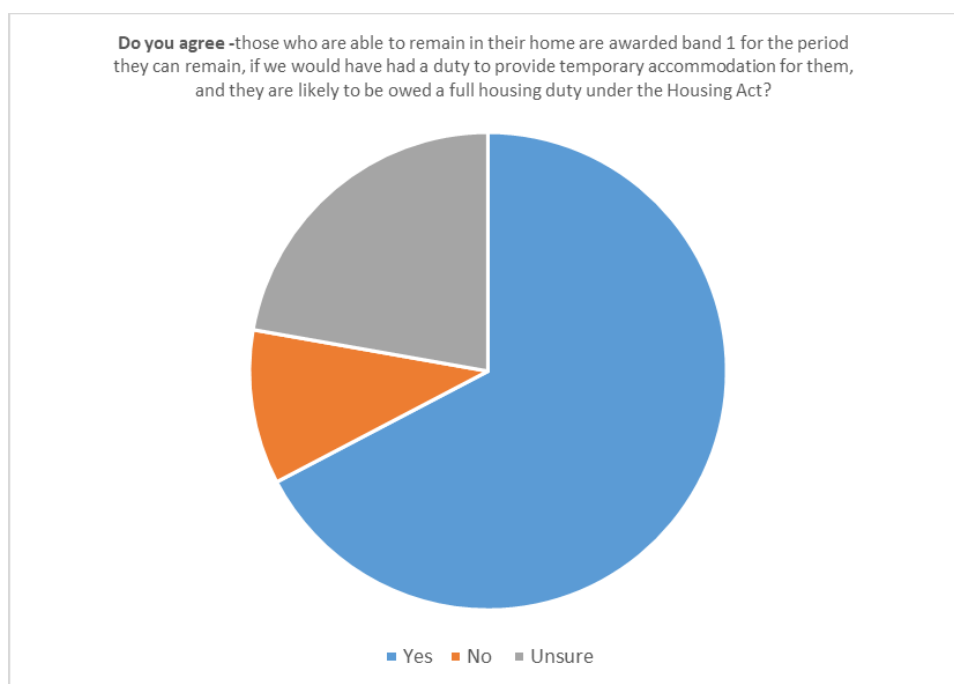
We propose that those who can remain in their home are awarded band 1 for the period they can remain, if -

- we would have had a duty to provide temporary accommodation for them, and
- they are likely to be owed a full housing duty under the Housing Act.

Do you agree with this?

**What we are proposing**

As discussed above in question 10, supporting households to remain in their current accommodation where it is safe to do so, helps prevent the harmful effects of homelessness on households. Additionally, we envisage that the number of households going into temporary accommodation will reduce as households will be more encouraged to take up alternative forms of support such as mediation to enable them to remain in their current accommodation.



- 67% of respondents agreed that those who can remain in their home are awarded band 1 for the period they can remain if we would have had a duty to provide temporary accommodation for them, and they are likely to be owed a full housing duty under the Housing Act.

**Question 12:**

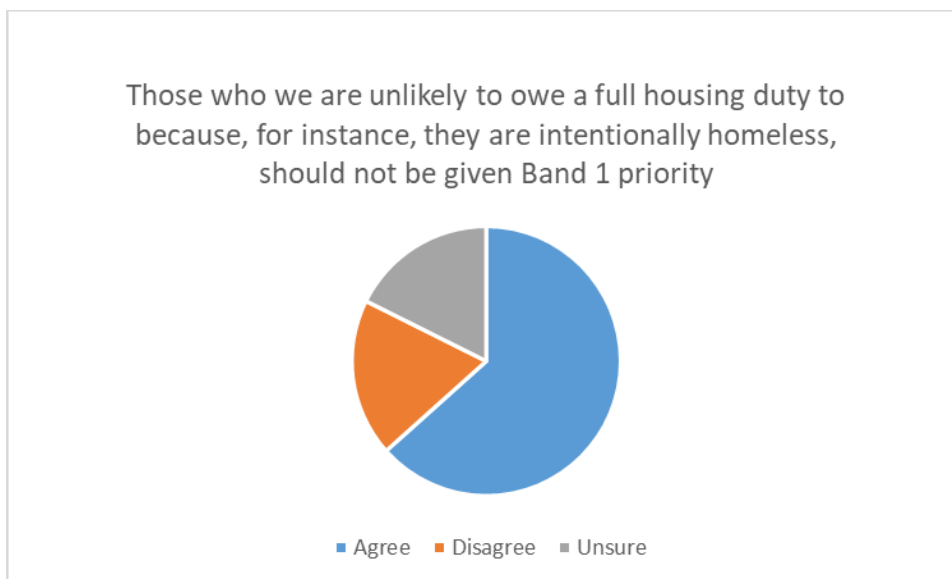
Those who we are unlikely to owe a full housing duty to because, for instance, they are intentionally homeless, should not be given band 1 priority

### What we are proposing

We propose that where it has been established that a Homeless Prevention Duty s.195 is owed **but** are **not** likely to be owed the s.193(2) Homeless Main Duty when the s.189b Relief Duty comes to an end because they are not believed to be in priority need or deemed to have worsened their housing circumstances the applicant will be awarded **band 2** priority. In all cases, we will work with households to relieve their homelessness. This requires the household to actively participate in resolving their situation during the 56 day relief period.

We want to try and keep band 1 as small as possible. For those who are unlikely to be priority need, we do not propose to award band 1 as they would not be offered temporary accommodation. As our aim for these proposals is to reduce temporary accommodation usage to prevent the harmful effects of homelessness on households; we do not feel that we need to award the same priority to these households.

Additionally, for those who are likely to be intentionally homeless, we do not want to award band 1 where they have caused a deliberate act or omission which has led to the loss of their last settled address.



- 63% of respondents agreed that those who we are unlikely to owe a full housing duty to because, for instance, they are intentionally homeless, should not be given band 1 priority

### Question 13

For clients who are still homeless, after we have tried to prevent their homelessness and have worked with them to find alternative accommodation through:

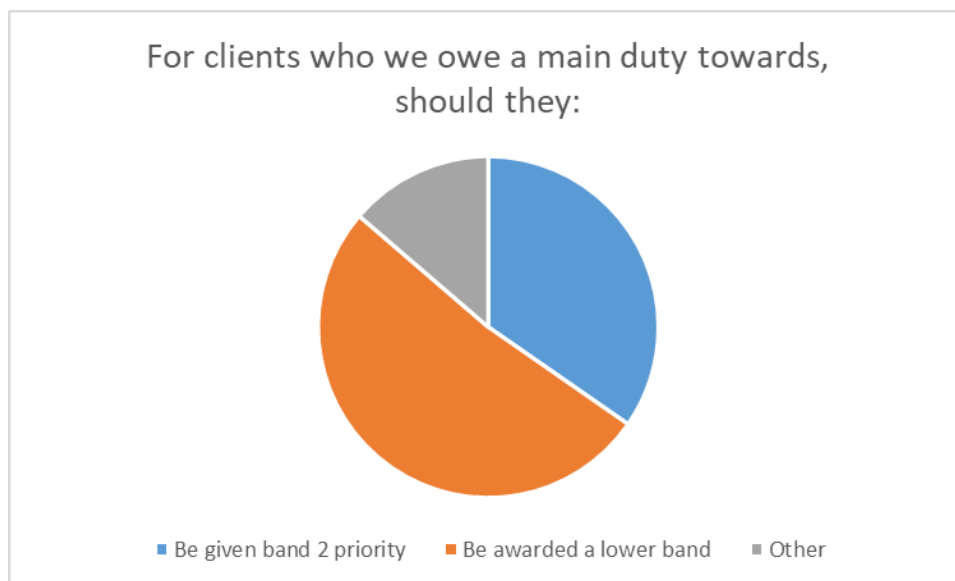
- the entire prevention stage **AND**
- the 56 day relief period **BUT**
- we have a full housing duty towards them

Should they:

1. Be given band 2 priority or
2. Be awarded a lower band or
3. Other

### What we are proposing

Currently, households who are accepted as homeless and so we owe the main housing duty to are awarded band 1. We propose that those cases who are owed a full housing duty under s.193(2) Housing Act 1996 (as amended by Homelessness Reduction Act 2017) will also be placed into in **band 3** but their band effective date will be backdated to by 3 months. This is to really encourage people to work with us at the earliest opportunity to prevent their homelessness where it is safe to do so.



- 52% of respondents agreed with our proposal to award band 3 to those who we owe a main duty towards.

### Question 14

For clients who are still homeless, after we have worked with them to find alternative accommodation through:

1. potentially a 56-day prevention stage **AND**
2. a 56-day relief period **AND**
3. we do not have a full duty towards them because for instance they are intentionally homeless

Should they:

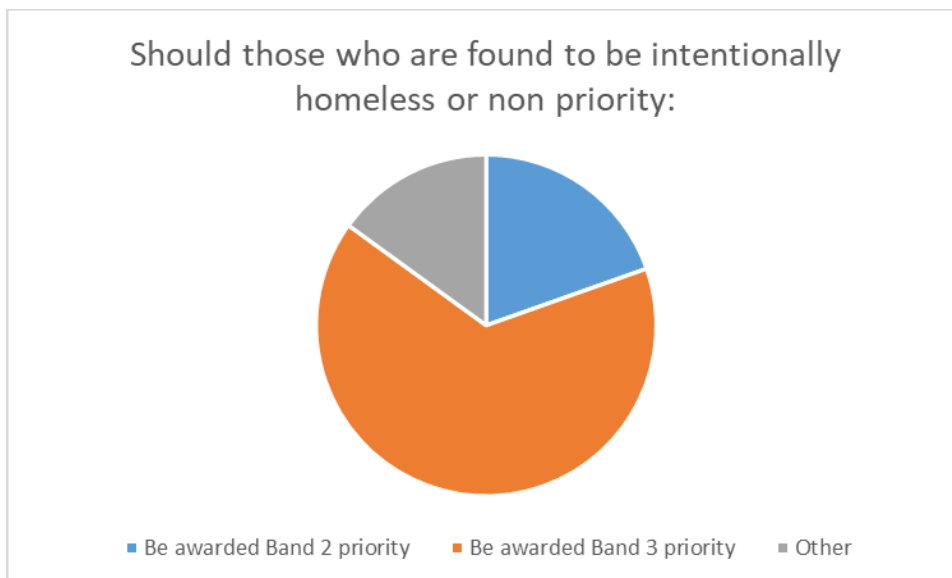
- Be awarded band 2
- Be awarded band 3
- Other

### What we are proposing

In all cases, where accommodation has not been found and the 56-day relief duty period has come to an end, an assessment will be undertaken to determine whether the applicant is owed a full housing



duty. Applicants who are not deemed to be in priority need as defined by s.189(1) of the act, are found to intentionally homeless and owed a duty under 195(5) or refuse an offer of suitable accommodation while owed a prevention or relief duty will be placed into **band 3**. These cases are more likely to be offered accommodation in the Private Rented Sector.



- 65% of respondents agree that those who are found to be intentionally homeless or non priority should be placed in Band 3.

### Respondent Comments

*"If people are not willing to work with the council to help themselves then they are removed from the register" No help given – Resident of Peterborough*

*"If they have made themselves homeless then no they shouldn't be made a priority" – Private rented sector tenant*

*"If people are intentionally homeless the council should not be obliged to assist them" - Professional Capacity*

## ARREARS

### Question 15

How far do you agree with the below statements in relation to former and current rent arrears?

- If you have any current or former rent arrears you won't be considered for an offer
- If you have debt between £1 and £500 you should be allowed on the housing register if you have made 13 consecutive payments to clear the debt.
- If your rent arrears are above £500 then you should not be allowed on the housing register.

### What we are proposing

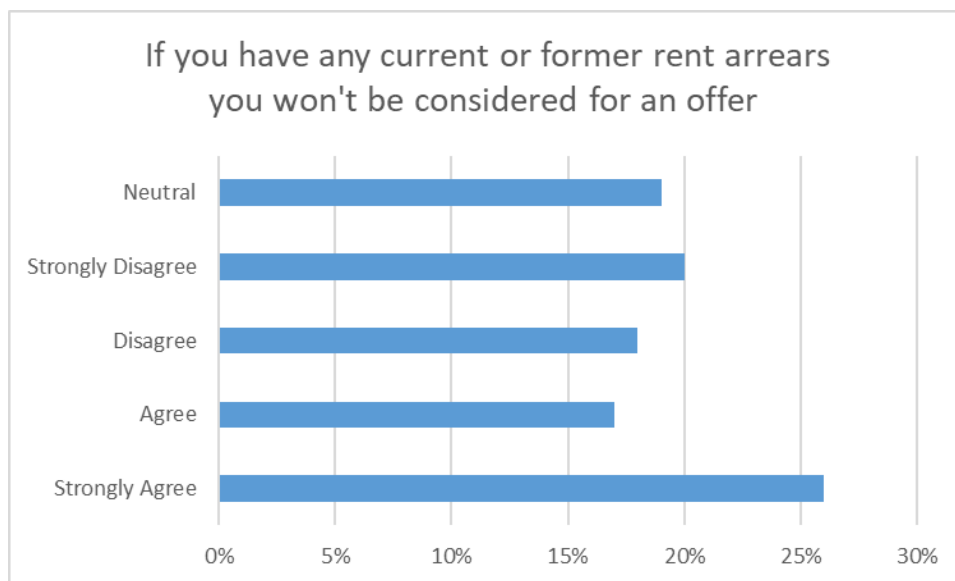
Currently anyone with any level of former rent arrears are not qualifying to be on the housing register. Households with current arrears of more than 8 weeks rent are also deemed non qualifying.

We propose to change this so that applicants with any current or former rent arrears who have not paid 13 weeks of consecutive payments will be deemed to be non-qualifying.

Applicants with any current or former rent arrears who have not paid 13 weeks of consecutive payments will be deemed to be non-qualifying.

Applicants who owe £500 or less and have paid 13 weeks of consecutive payments will be eligible to apply. Prior to shortlisting for a property, they must have continued to make regular payments. If their payments have stopped or their debt goes over £500 then they will be deemed to be non-qualifying. Once the debt is reduced to under £500 and 13 consecutive payments have been made towards the arrears then they will be able to re-apply.

Amount owed	Eligible to join?	Conditions	Eligible to shortlist?
£1-500	Yes	Must have made at least 13 consecutive re-payments	Must have maintained re-payments
£500 +	No	Not eligible until the debt is reduced to under £500 and 13 consecutive re-payments made	No



- 43% of respondent's either agreed or strongly agreed that if you have any current or former rent arrears you should not be considered for an offer. 38% either disagreed or strongly disagreed with this.

### Respondent Comments

*“Those who are struggling with debt are likely those in high need of support with affordable housing”*  
 – Resident of Peterborough

*“It’s about ability and effort to pay what is owed”* - Professional Capacity

*“If someone has payment plan then they should be allowed to be housed”* – Private Rented Sector Tenant

*“13 consecutive payments could be 13 x £1 and therefore any re-entry into the housing register should be subject to a RSL panel review”* - Representative of a Register Social Housing Provider

## **UNACCEPTABLE AND ANTISOCIAL BEHAVIOUR**

### **Question 16**

Which of these statements do you agree with?

If you have been evicted from any tenancy for Anti Social Behaviour:

- You should not be able to join the housing register
- You should be able to join the housing register, but only once you have successfully held a tenancy or resided in supported or temporary accommodation for 6 months
- You should be able to join the housing register, but only once you have successfully held a tenancy or resided in supported or temporary accommodation for 12 months

### **What we are proposing**

We propose that an applicant is not a qualifying person if they are guilty of unacceptable behaviour or if they are the subject of an anti-social behaviour injunction.

Local Authorities, housing trusts and other housing organisations or companies who are landlords can apply for an injunction against a person or a member of their household to stop them behaving in a way which causes nuisance or annoyance to other people living in, or visiting, the rented property or the area itself. These are known as "injunctions against anti-social behaviour".

Anti-social behaviour can include noise, harassment, drug dealing, racial threats, violence or using property for immoral or illegal purposes.

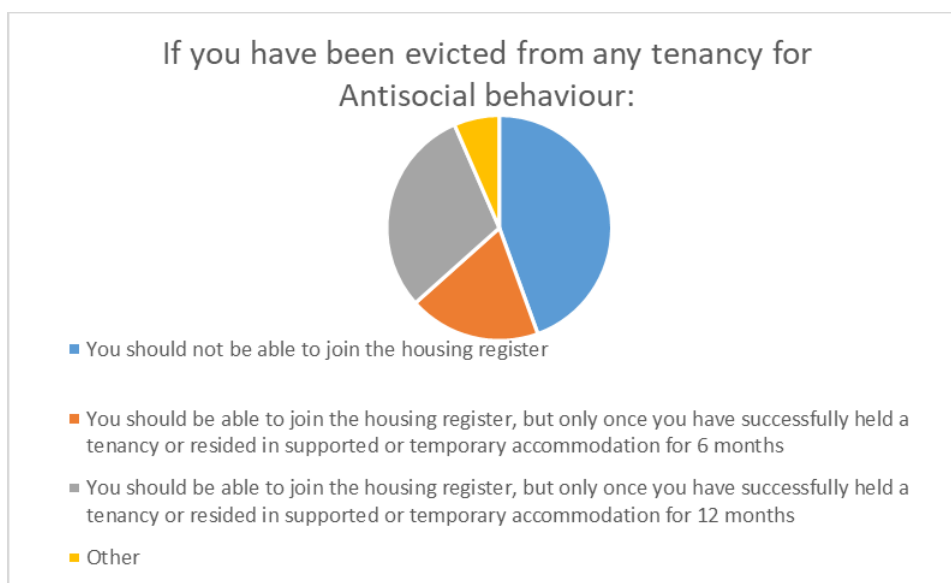
Unacceptable behaviour is behaviour of the applicant or a member of their household which would entitle the council to obtain at least a suspended possession order on any of grounds 1 – 7 of the Housing Act 1985 if the applicant were a secure tenant of the council. Such behaviour may include:

- i. failing to pay the rent.
- ii. breaking the terms of a tenancy agreement.
- iii. causing nuisance to neighbours or anti-social behaviour.
- iv. being convicted of using the home for immoral or illegal purposes.
- v. being convicted of an arrestable offence committed in, or in the vicinity of the home;
- vi. causing the condition of the property to deteriorate by a deliberate act, or by neglect; and
- vii. making a false statement to obtain a tenancy

If an applicant is not guilty of behaviour that would not reach the threshold of a suspended possession order, then their application would not be disqualified.

Currently, if an applicant is guilty of unacceptable behaviour, they are deemed to be non-qualifying on the housing register. Some clients spend a considerable period in temporary accommodation, sometimes which is self-contained and manage very successfully. Alternatively, some clients go into supported accommodation where they successfully reside for up to 2 years. We therefore propose to change the policy so that these periods of successful tenancy management can be considered.

Therefore, we are proposing that applicants who have previously been guilty of unacceptable behaviour but can now demonstrate an ability to successfully maintain a tenancy without issue for a period of at least 12 months will be able to re-apply on the register. This includes those who have successfully resided in temporary accommodation provided by Peterborough City Council or supported accommodation provided by one of the Councils partners who work with us as part of the Supported Accommodation Pathway.



- 44% of respondents do not believe that you should be able to join the housing register if you have been evicted from any tenancy for Antisocial Behaviour.
- 49% of respondents believe that you should be able to join the housing register after either 6 or 12 months of successfully holding a tenancy or residing in supported or temporary accommodation.

**Respondent Comments**

*“There needs to be proof of reformation before subjecting other neighbours to that sort of behaviour”*  
 - Resident of Peterborough

*Tenants who have been evicted for Anti Social Behaviour are given numerous chances to change their behaviour and are only evicted as a last resort so allowing them to move elsewhere to another social housing property will only move the anti social behaviour on to another area. This is a waste of money and resources”* - Resident of Peterborough

*“Six months gives them an opportunity to reflect on the past and change”* – Professional capacity

### Question 17

Do you have any other thoughts?

The below are a few of the comments from this question:

*“Recognise mental health is as much disability when the housing situation is directly affecting the client's mental wellbeing and causing serious issues for the client. Priority should be given to people who have never had a council house or rent arrears and were born in the area”* - Resident of Peterborough

*“All too often the Allocations Policy is applied to the applicants without giving too much weight to their personal circumstances. Discretion should be applied where appropriate, particularly when the applicant has shown commitment to improving their situation”* - Professional Capacity

*“I would like to see more houses offered to key workers who can't get a mortgage or to people on lower incomes that are working rather than people who are not willing to work. If you are giving people a house in a new area where other people already living there have to pay a yearly management fee then this should also apply to those in social housing. I would also like to see more inspections of the property as they do in the private sector”* - Resident of Peterborough

### Respondent Comments

#### HOMEOWNERS AND THOSE WITH SUFFICIENT FINANCIAL RESOURCES

Currently, an applicant is not a qualifying person if they own a freehold or long leasehold interest in a residential property, which it would be reasonable for them to occupy or they have sufficient resources to secure their own accommodation by purchase or by renting privately.

An applicant is also not a qualifying person if their household's gross annual income is in excess of £40,200 per annum, or has savings or assets totalling more than £16,000. They will be considered to have sufficient income to secure a suitable home by purchase or by renting privately.

We propose to change these limits to reflect more accurately the costs of either privately renting or having the resource to be able to obtain a mortgage.

Therefore, an applicant would not be a qualifying person if their household's gross annual income exceeds the following limits -

Size of accommodation required	Minimum Gross Annual Income
1 bedroom	£33,488
2 bedrooms	£43,108
3 bedrooms	£49,452
4 bedrooms	£62,400
5 bedrooms	£105,872

These figures have been calculated on the assumption that 30% of a household's net income should be used for housing costs. The formula used is detailed below

Average monthly rent by property size x 12 (months) ÷ 30% (minimum net income level) + 30% to include for deductions (Tax & NI) = Minimum Gross Annual Income

EXAMPLE: 1 bedroom need

Average monthly rent £644 x 12 months = Annual rent £7,728  
Annual rent £7,728 ÷ 30% = Net Income level £25,760  
Net Income Level £25,760 + 30% = Gross Annual Income £33,488

These figures will be reviewed annually in April to ensure that they reflect up to date average income and average rental rates in Peterborough.

### **Feedback received**

Many of those who attended the consultation events agreed that the size of accommodation required should be considered when looking at whether an applicant has sufficient resources. Some felt that the minimum gross annual income figures were too high and needed to be reduced.

Additionally, there was some feedback via the consultation questionnaire:

*My thought is that when applying for Universal Credit applicants aren't able to claim it if they have over £16,000 in savings as they're deemed to have enough to live on. So I was thinking that this should also still apply to joining the Housing Register as Applicants would have enough to rent privately with, as is in the current guidance – Professional Capacity*

## **4. Next steps**

In the light of consultation, we have decided to recommend the following additional changes to the proposed policy.

### **Rent arrears**

Feedback from the consultation events was that there is such disparity in rent per month between a 1 bedroom and a 4-bedroom property and so instead of the limits being by amount of rent arrears, it would be fairer to be how many weeks rent were owed.

We therefore propose to change the policy as follows:

Applicants who owe 4 weeks rent arrears or less and have paid 13 weeks of consecutive payments will be eligible to apply. Prior to shortlisting for a property, they must have continued to make regular payments. If their payments have stopped or their debt goes over 4 weeks rent arrears, then they will be deemed to be non-qualifying. Once the debt is reduced to 4 weeks rent arrears or less and 13 consecutive payments have been made towards the arrears then they will be able to re-apply.

Additionally, there was feedback from Registered Partners that panels work effectively to discuss households who are in arrears who wish to re-join the housing register. The benefits of this are that those cases where there are exceptional circumstances or a composite housing need, can be considered. In order to balance this alongside ensuring effective use of officer and Registered Provider time, we propose that applicants who owe over 4 weeks rent arrears must make 13 weeks consecutive re-payments. After this time, the proof of these repayments must be uploaded to the applicants account alongside a request to go to Registered Provider Panel (RPP). At the RPP the clients circumstances will be taken into consideration and a decision made whether the client is able to join the housing register.

Registered Provider Panel will be held monthly and there must be at least 3 Registered Providers in attendance for a decision to be made.

To summarise:

Amount owed	Eligible to join?	Conditions	Eligible to shortlist?
4 weeks rent arrears or less.	Yes	Must have made at least 13 consecutive re-payments	Must have maintained re-payments
Over 4 weeks rent arrears	Not until approved at Registered Provider panel	Not eligible until 13 consecutive re-payments have been made. After this point a Registered Provider panel referral will be made.	No

### **Registered Provider Lettings Policies**

Feedback from the consultation events was that providers wished to make it clear in the Allocations Policy that they also have their own Lettings Policy which applicants must qualify so they can be considered for an offer. This criteria is individual to each Registered Provider and may differ from the criteria in the allocations policy.

Therefore, there are examples of clients who are a qualifying person in accordance with the Peterborough Homes Allocations Policy but when they are shortlisted for a property, the Registered Provider refuse them as they do not meet their own Lettings Policy criteria.

We have therefore added the following into the draft policy:

Peterborough Homes Landlord may have their own lettings policies which are separate to this policy. Applicants who are deemed a “qualifying person” in accordance with the Peterborough Homes Allocations Policy can be shortlisted for any Peterborough Homes Landlord property that meets their need. If a Peterborough Homes Landlord assesses that they do not meet the criteria of their own individual Lettings Policy, they will contact the applicant directly to explain the reasons why and the appeal process.

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