

Appendix 1: How the Housing Allocation Scheme was Developed

This document presents a summary of responses from the ‘Have your say on the Draft West Northamptonshire Council Housing Allocation Scheme’ consultation and details how we have taken them into consideration for the final version of the West Northamptonshire Housing Allocation Scheme, which is to be implemented on 1st April 2024.

Figures 1-4 show the demographic of the respondents, whilst figures 5-18 show the numbers and percentages of those who responded to that particular question. Under each figure, there is a summary of all of the comments received that highlight the general responses to that question.

The formal consultation on the draft housing allocation scheme ran from 19th July – 26th September 2023. We had a total of **732 responses** analysed, with **445 completing** the whole questionnaire from a variety of groups and individuals including residents, registered providers, voluntary and charitable organisations, statutory bodies, and parish/town councils. There were **3751 separate comments** throughout the consultation, although not all of these were completed.

Charts 1-4 shows the overall satisfaction of responses on the consultation, broken down further to reflect each section. Table 1 shows the summary of the consultation responses and how this scheme will address those comments. Table 2 shows the issues that raised the most comments.

This Scheme was developed jointly by elected members of West Northants Council, officers, local partners and stakeholders through the following channels:

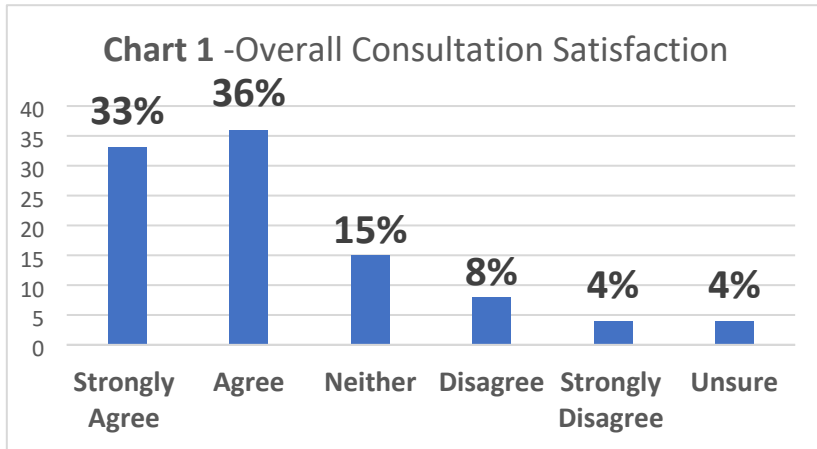
Evidence gathering – We collected a wide range of evidence across all areas which impact on Housing Allocations to understand what would be needed within a new Scheme which supersedes three existing Schemes in Daventry, South Northants, and Northampton.

Validation workshops – We held a number of workshops with different departments in the council, NPH and external organisations who will be involved with the delivery of the new housing allocation scheme to understand the context and delivery challenges they face.

Member and Scrutiny committee involvement – We attended Executive Programme Board (EPB) and Health, Education and Housing Overview and Scrutiny committee to share the draft scheme as it was developed and to receive input into the final draft of the Scheme.

Formal public consultation – We did a full public consultation to understand people’s concerns and priorities so that we could ensure the new housing allocation scheme had the right focus that matched the local housing needs of residents in West Northamptonshire.

Charts 1-4 below show the overall satisfaction from the survey questions as well as a breakdown of satisfaction in the three sections. Over two thirds of people strongly agree or agreed with all proposals within the housing allocation policy draft scheme, same can be said for the qualification, other matters, and banding sections. Only a small percentage of people strongly disagreed or disagreed with the proposals, in which table 1 at the end of the document outlines what has changed as a result of comments received throughout.



The first set of questions set out the demographics of those replying to the consultation. Figures 1-4 show who has replied.

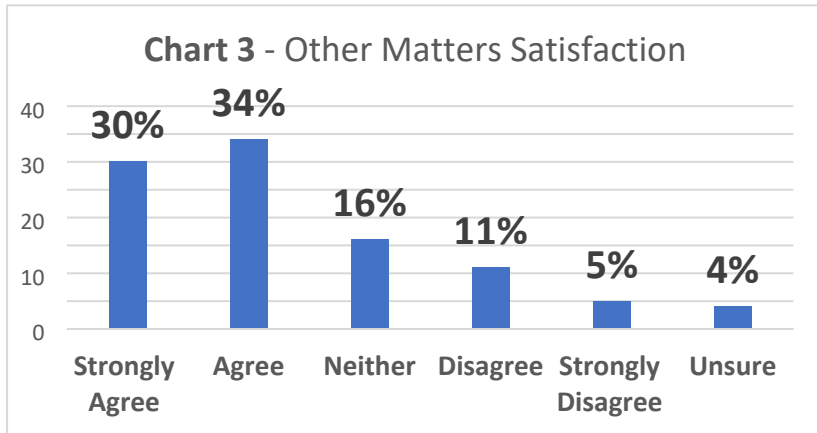
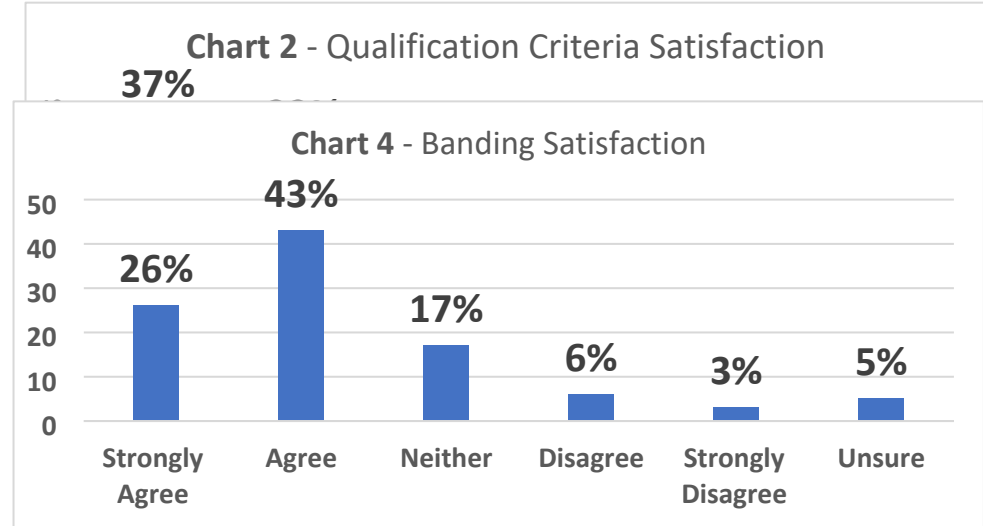


Figure 1 - Are you responding to this consultation as (select on answer):	
Answer:	Count (#)
A local resident of West Northamptonshire	624
A registered provider/housing association	18
A representative of a town/parish council	4
On behalf of a local authority	3
A representative of the voluntary sector or a community organisation	4
A representative of any other business or organisation	1
A West Northamptonshire Council councillor	3
A town or parish councillor	5
A West Northamptonshire Council employee	9
Other (please detail below)	41
Total	712
Not answered	20

Figure 2 - Are you (select one answer)		
Answer:	Count (#)	Per cent (%)
A homeowner, outright or mortgaged	70	11%
A tenant of affordable or social housing, such as a housing association tenant	200	31%
In other affordable housing such as shared ownership	4	1%
A private tenant	162	25%
A lodger or rent a room	28	4%
Living with friends or family (including parents)	100	16%
No fixed abode	31	5%
Other (please give details below)	41	6%
Total	636	100%
Not answered	96	

Figure 3 - Please let us know which of the following apply to you:		

Answer	Count (#)	Per cent (%)
I am already registered with a current Housing Allocation Scheme within West Northants	363	57%
I am thinking of registering	132	21%
None of the above	138	22%
Total	633	100%
Not answered	363	57%

Figure 4 - Are you a Northamptonshire Partnership Homes/Council tenant?		
Answer	Count (#)	Per cent (%)
Yes	132	21%
No	444	69%
Unsure	64	10%
Total	640	100%
Not answered	92	

The **Registered Providers** that replied to the consultation were as follows:

- Northamptonshire Partnership Homes (replied as a 'Local Authority')
- Northamptonshire Rural Housing Association
- Amicus Trust Ltd
- BPHA
- Places For People
- Midland Heart
- Futures Housing Group
- Grand Union Housing Group
- Anchor Homes

There were a small number of **other organisations** including parish councils that also responded, they are as follows:

- Emmaus Village Carlton
- Croughton Parish Council
- Farthinghoe Parish Council
- Old Stratford Parish Council
- Cosgrove Parish Council
- Town Council
- Change Grow live
- Northampton Children's Trust
- Resettle
- Eve
- West Northamptonshire Council

The findings from the formal public consultation are highlighted below:

Section 1 – Qualification:

Figure 5 – Qualification: Local connection		
To what extent do you agree or disagree with the local connection criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	194	34%
Agree	215	38%
Neither agree nor disagree	85	15%
Disagree	34	6%
Strongly disagree	13	2%
Unsure	28	5%
Total	569	100%
Not answered	163	

There were **264 separate comments** given on the question around Local Connection.

Most comments strongly agreed or agreed with the proposed local connection criteria, stating that local people should have priority over people moving into the area. It gives local people a better chance of securing social housing, as well as lots of comments suggesting that family support is critical.

Some neither agreed or disagreed stating that the local connection criteria were ok, but believed that if a property was vacant and no one from that area was moving in, then the bordering area should be able to move in.

Those who disagreed or strongly disagreed stated that the 2 years criteria are too long and that it discriminates against those who need to move to the area because of work commitments. Some also wanted a further definition into ‘family connection’. A couple of comments also suggested a 5 year local connection criteria. It was also mentioned that there is not enough social housing in areas where people grew up which is forcing them to look elsewhere, making the proposed local connection criteria difficult.

One comment suggested that these changes do not consider the local needs of West Northants and will cause an increase in demand.

Overall, the majority of comments were in support of the proposed local connection criteria.

Figure 6 – Qualification: Unacceptable or unreasonable behaviour		
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To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?		
Answer	Count (#)	Per cent (%)
Strongly agree	316	58%
Agree	161	29%
Neither agree nor disagree	32	6%
Disagree	17	3%
Strongly disagree	10	2%
Unsure	11	2%
Total	547	100%
Not answered	185	

There were **249 separate comments** given on the question around unacceptable or unreasonable behaviour.

Most comments strongly agree or agree with the proposed criteria stating that everyone should be able to live in a neighbourhood that is safe and peaceful. Good behaviour also encourages areas to be nice places to live. Some also believe that if people have these past convictions, then they need to face the consequences and leave people who abide the law to live in peace.

Some who agreed or neither agreed or disagreed were mostly in favour of the proposed criteria but had some comments around the term 'unacceptable and 'unreasonable' being too subjective and need to stick to legal terms. Some would also like to see support given to those who have been found guilty of unacceptable or unreasonable behaviour. Some were also not confident on this being adhered to with those falling under this category still managing to get themselves on the housing register.

Those who strongly disagreed or disagreed suggested that people should be given a second chance and commented that people can change and become better and should not be held to this criteria.

Comments alluded to the timescales of this behaviour, stating if it was a long time ago then it is fine, but not if it was recent.

Overall, the majority of comments were in favour of the proposed unacceptable or unreasonable behaviour criteria.

Figure 7 - Qualification: Housing related debt		
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To what extent do you agree or disagree with the disqualification for those who have a housing related debt?		
Answer	Count (#)	Per cent (%)
Strongly agree	121	23%
Agree	166	31%
Neither agree nor disagree	108	20%
Disagree	75	14%
Strongly disagree	37	7%
Unsure	26	5%
Total	533	100%
Not answered	199	

There were **297 separate comments** given on the question around housing related debt.

Those who did strongly agree or agree and made comments believed that people should clear their debts before applying to the scheme, some commented stating why should those who do not have debt and pay their rent on time be disadvantaged over those who do not pay their rent on time.

Some of those who neither agreed or disagreed, stated that it should be done on a case-by-case basis, some people get into housing related debt from no fault of their own. The circumstances as to why people are currently in housing related debt should be considered. Some want to see what an acceptable level of payment in a payment plan is, for example is £1 enough?

Most of the comments strongly disagreed or disagreed with the proposed housing related debt criteria, stating that the current cost of living crisis and current climate has made it extremely difficult for people to keep on top of things like rent. Comments also suggested that this criteria is punishing people further who are in housing related debt and won't be able to afford a home via other means. Sometimes debt is not the fault of the individual so they should not be punished and made potentially homeless. A theme of people wanting to see exemptions for various reasons.

Overall, over half of responses strongly agreed or agreed with the proposed housing related debt criteria, however the comments leaned more towards the strongly disagreed or disagreed with a strong emphasis of this being on a case by case basis due to different personal circumstances.

Figure 8 - Qualification: Breaches of tenancies		
To what extent do you agree or disagree with the breaching tenancy criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	250	48%
Agree	193	37%
Neither agree nor disagree	43	8%
Disagree	13	2%
Strongly disagree	10	2%
Unsure	13	2%
Total	522	100%
Not answered	210	

There were **250 separate comments** given on the question around breaching tenancy conditions.

Most comments were strongly agreed or agreed with the proposed criteria for breaching of tenancy conditions, stating that tenants should know and respect the rules at all times. People who do not respect the rules do not deserve to be considered for the housing register.

Some neither agreed nor disagreed stating that most of the criteria was fine, however there were a number of comments that related to repairs and concerns that repairs were not carried out in a timely manner by the landlord would jeopardise applicants place on the housing register.

Only a small amount strongly disagreed or disagreed, stating that not everyone should be subject to sanctions within the scheme, for example, living in a shared house if just one person breaks the rules. There should also be an expanded list that covers all types of breaches that occur in social and private sector tenancies. Also, that tenants need more help than they currently receive which could lead them to inadvertently breach tenancy conditions. Some people should be given a second chance.

Figure 9 – Qualification: Property Ownership		
To what extent do you agree or disagree with the property ownership criteria?		
Answer	Count (#)	Per cent (%)
Strongly agree	220	43%
Agree	166	32%
Neither agree nor disagree	68	13%
Disagree	27	5%
Strongly disagree	15	3%
Unsure	19	4%
Total	515	100%
Not answered	217	

There were **260 separate comments** given on the question around property ownership.

There were some comments that strongly agreed or agreed, stating that if you own a property then you should not be allowed to rent a council house and should sell the house if they needed the money.

Some comments also referred to this not being polices fully and that fraudulent reports are not identified.

However, most comments suggested that this should be reviewed on a case by case basis as everyone's circumstances are different. A lot of comments leant towards those who were domestic abuse victims or those who were going through a breakup and were disabled, making it hard to find suitable properties.

Figure 10 – Qualification: Income and savings		
To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?		
Answer	Count (#)	Per cent (%)
Strongly agree	218	43%
Agree	149	30%
Neither agree nor disagree	61	12%
Disagree	35	7%
Strongly disagree	31	6%
Unsure	11	2%
Total	505	100%
Not answered	227	

Figure 11 – Qualification: Income and savings		
To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?		
Answer	Count (#)	Per cent (%)
Strongly agree	126	25%
Agree	134	27%
Neither agree nor disagree	103	21%
Disagree	81	16%
Strongly disagree	38	8%
Unsure	20	4%
Total	502	100%
Not answered	230	

There were **321 separate comments** given on the question around income and savings.

The comments were focused more around the £16k savings, those who strongly agreed or agreed suggested that if you have £16k saved up then you can at least afford to rent privately and that earning £60k is also enough to do this. Some also suggested that an increased should be applied to around £70k income and £30k savings to ensure genuine need.

Others commented that £16k would never be enough to put a deposit down on a house in today’s climate, with some suggestions that this should be raised to £25k. It was also commented that people should be able to do what they want with their money and that income and savings shouldn’t be included in the criteria. DLA and PIP should also not be included as income.

Some comments referred to a ‘large’ salary does not reflect the outgoings people may have to undertake a certain job.

Overall, most people were in favour of the income and savings proposal, however the comments lean towards £16k being outdated and needs to be reviewed.

Figure 12 – Qualification: No Housing Need		
To what extent do you agree or disagree with the disqualification of those who have no housing need?		
Answer	Count (#)	Per cent (%)
Strongly agree	133	26%
Agree	163	32%
Neither agree nor disagree	96	19%
Disagree	52	10%
Strongly disagree	37	7%
Unsure	23	5%
Total	504	100%
Not answered	228	

There were **300 separate comments** given on the question around no housing need.

The comments on this question are fairly mixed as is the overall responses. Most comments suggest that the person should be assessed for housing, and it should be based on their own personal circumstances. This who strongly agree or agree have stated that those who do not have a housing need should not even be compared to those that do have a housing need and see this questions as very straight forward.

Some have commented that the 'no housing need' has not been defined so are unable to comment on the question. Some have 'no housing need' but are constantly affected by anti-social behaviour, which is ruining their mental health, where does this sit under the no housing need criteria. Comments also suggested that if you have no housing need then you should not be allowed on to the register.

There were comments that stated people should be allowed to move if they are uncomfortable in their current home.

Section 2 – Other Matters:

Figure 13 - Other matters, Deliberately worsening circumstances		
To what extent do you agree or disagree that those who have purposely worsened their housing circumstances should be given the lowest priority?		
Answer	Count (#)	Per cent (%)
Strongly agree	171	35%
Agree	180	37%
Neither agree nor disagree	78	16%
Disagree	30	6%
Strongly disagree	13	3%
Unsure	19	4%
Total	491	100%
Not answered	241	

There were **291 separate comments** given on the question around deliberately worsening circumstances.

A high number of comments stated that people strongly agree or agree with this proposed criteria, suggesting that if you are deliberately worsening your circumstances then you should indeed be disqualified from the housing register, as other people are being honest and abide by the rules.

Those who neither agree or disagree stated that it needs to be looked into as to why people would deliberately worsen their circumstances, they could be fleeing domestic abuse or have mental health problems.

A lot of comments focused around not being able to either define what is 'deliberate' and also proving if they have deliberately worsened their circumstances. This needs to be reviewed and explained in more detail.

Figure 14 - Other matters, Number of offers		
To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?		
Answer	Count (#)	Per cent (%)
Strongly agree	118	24%
Agree	156	32%
Neither agree nor disagree	75	15%
Disagree	80	17%
Strongly disagree	36	7%
Unsure	19	4%
Total	484	100%
Not answered	248	

There were **329 separate comments** given on the question around number of offers.

Those who strongly agree or agree stated that if the person needs a house, then they should take up the offer. Responses suggested that people are on the housing register to be housed and that turning down this number of offers goes against the reason they are on the housing register in the first place.

There were concerns that the blanket approach in adopting a Scheme that allows 3 offers could have implications on trying to manage those households in temporary accommodation for those owed a statutory homelessness duty, but also could in higher refusal rates and impact on void relet time.

Other suggested that the adverts need to have more detail such as pictures of the property, everyone should be considered on a case by case basis with investigations in to why someone has refused an offer, it could be for a number of reasons such as the area not being suitable for them.

There were comments that suggested a range of alternative number of offers should be given. Some stated that people should be able to turn down as many as the like until they are offered something that is suitable for that individual, others wanted 4 or 5 refusals. Some also stated that 12 months was too long if all offers were refused and that 6 months was more reasonable.

Some were suggesting that the area needs to feel safe for them and will not accept somewhere that could harm their health. Should retain priority until a suitable property is found, most people will accept if it is suitable for them. MAPPA applicants should be given the same number of refusals.

Some stated that definitions of ‘reasonable’ and ‘acceptable’ need to be explained in more detail.

Section 3 – Prioritisation of Applicants:

Figure 15 - Prioritisation of applications, Band A		
To what extent do you agree or disagree with Band A being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	176	37%
Agree	207	43%
Neither agree nor disagree	49	10%
Disagree	24	5%
Strongly disagree	6	1%
Unsure	16	3%
Total	478	100%
Not answered	254	

There were **294 separate comments** given on the question around prioritisation of Band A.

Most people strongly agree or agree with the criteria within Band A. Comments suggest that people are happy with the criteria and that those who need housing the most should indeed be in the top priority band.

A number of comments suggested that they are surprised Homeless categories have been left out of the top band and have called to have this put in Band A.

Some have suggested that urgent medical need should be in Band A. Some have also asked how people will prove they are entitled to be placed in their bands.

There was a suggestion around making Downsizing its own band, as well as having an emergency band. Some also suggested that there is a lot of criteria in band A which makes it very difficult for anyone in the lower bands to be housed.

Figure 16 - Prioritisation of applications, Band B		
To what extent do you agree or disagree with Band B being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	122	26%
Agree	224	47%
Neither agree nor disagree	72	15%
Disagree	25	5%
Strongly disagree	6	1%
Unsure	23	5%
Total	472	100%
Not answered	260	

There were **303 separate comments** given on the question around prioritisation of Band B.

A lot of responses either strongly agreed or agreed and stated that they had no problem with what was in Band B. However, most of the comments had suggested what they thought needs to be moved around. Again, a lot of comments stated that homeless should be in Band A, and that people in Band B get forgotten due to those in Band A getting the priority.

Some have stated that fostering should not be in this band as they chose this profession and should sort their own housing, as well as stating that people could use fostering to gain a bigger house and then stop fostering once they move in. Some have also suggested that people have more children on purpose and should be placed in Band D.

Some have suggested that MAPPA should not be in Band B as this is rewarding illegal/criminal behaviour.

Others have stated that the highest medical need should be in Band A as well as care leavers.

Some have stated that priority should only be given to those who have been on the housing register the longest.

Figure 17 - Prioritisation of applications, Band C		
To what extent do you agree or disagree with Band C being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	83	18%
Agree	205	44%
Neither agree nor disagree	104	22%
Disagree	34	7%
Strongly disagree	17	4%
Unsure	21	5%
Total	464	100%
Not answered	268	

There were **308 separate comments** given on the question around prioritisation of Band C.

Most comments for Band C were around the intentionally homeless criteria, most who commented around this stated they those who are intentionally homeless should not be considered for the housing register at all. Others though have stated that certain circumstances such as domestic abuse could be a reason for this, and each case should be looked at individually.

Some asked for an example or a definition of intentionally homeless. Some have suggested overcrowding should be in a higher band.

Some clarity to be given on the medium medical welfare was suggested.

Figure 18 - Prioritisation of applications, Band D		
To what extent do you agree or disagree with Band D being awarded in these circumstances?		
Answer	Count (#)	Per cent (%)
Strongly agree	112	24%
Agree	178	39%
Neither agree nor disagree	99	22%
Disagree	29	6%
Strongly disagree	18	4%
Unsure	24	5%
Total	460	100%
Not answered	272	

There were **295 separate comments** given on the question around prioritisation of Band D.

Most people strongly agreed or agreed with the criteria in Band D, although the comments had varying suggestions.

A lot of comments stated that local connection should be placed in a higher band and that people should not be disadvantaged to live in a place where they grew up, especially in villages.

Some comments also suggested that Band D should be taken out completely as they feel people will never get housed and is pointless.

It was asked for 'deliberately' to be defined. Some have suggested that people who have deliberately worsened their circumstances should be completely disqualified.

General Comments

There were **415 separate general comments** at the end of the consultation.

A lot of the general comments alluded to that respondents' personal circumstances, however there were a lot of suggestions and overall thoughts about the scheme as a whole.

Overall comments are positive, people have stated that bringing the scheme under one WNC scheme will benefit the area. It is very important to keep local family connection when considering the content of the scheme.

There were a lot of comments that suggested research needs to take place into the individual circumstances before making any decisions, an emphasis within the comments stated that people need to be listened to more, especially around refusing offers. Some people cannot help their situations and should not be punished for this.

Some comments alluded to the timeframe in which this scheme is being worked on, asking why this is coming down to the final months before it needs to be implemented when the council has had 3 years to complete it.

People's mental health needs to be taken into consideration a lot more when making decisions. Some people commented that homeless applicants should not be allowed to refuse any offers at all.

People should be allowed to move up priority bands after a certain timeframe of being in a particular band.

Some also suggested that more work should be focussed on building social housing rather trying to place people into bands.

Table 1: Summary of consultation comments and how the housing allocation scheme is responding

	You said....	Summary	We did...
Section 1 – Qualification			
1	Family Connections should be made clearer in the scheme document.	<p><u>Question 1 (Figure 5)</u> To what extent do you agree or disagree with the local connection criteria?</p> <p>Questions were asked in the consultation feedback around making the ‘family connection’ criteria clearer within the scheme document.</p> <p>The consultation draft scheme provided a definition of family associations and explained this is limited to immediate family members.</p> <p>It also set out the qualifying criteria for employment and family connection</p>	<p>Based on the consultation responses, the definition of family association (now referred to a ‘close family connections’, and the criteria around employment has been rewritten to define them much more tightly.</p> <p>The definition of ‘close family’ has been more narrowly defined to include ‘spouse or partner, mother, father or other legal guardians, brother, sister or adult son or daughter.</p> <p>Change to draft Scheme.</p>
	Local connection of 2 years is too long.	<p><u>Question 1 (Figure 5)</u> To what extent do you agree or disagree with the local connection criteria?</p> <p>The consultation draft Scheme set out that a local connection can be established by virtue of two years’ residency, close family connections and employment</p>	<p>The Scheme needs to match demand to supply, and this is balanced against limited supply of affordable housing. Applying a local connection criteria can support this. The local connection criteria being proposed is in line with neighbouring local authorities. There are also some exceptions to the local connection – see section 5.3.4</p> <p>No change to Scheme</p>

2	<p>People with convictions should be disqualified from the scheme if they are serious and recent.</p>	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>The meaning of unacceptable behaviour for the purpose of this scheme will apply where an Applicant, or any member of their current or prospective household, has determined that, in the view of the Local Authority, makes then at the time of their application, or since their applicant, unsuitable to be a tenant.</p> <p>The Scheme will not take account of any behaviour relating to a spent conviction. Unacceptable behaviour is set out on section 5.4.1 of the Scheme.</p>	<p>The Rehabilitation of Offenders act 1974 prohibits any organisation or person taking account of spent convictions any person might have.</p> <p>It is considered that the final draft Scheme is comprehensive around unreasonable behaviour, however some minor changes to wording has been made.</p> <p>Change to draft Scheme.</p>
3	<p>People should be helped with their unacceptable and unreasonable behaviour; they might have acted this way due to a number of reasons such as mental health.</p>	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>The Council will provide general advice and assistance and has a duty to provide information and help to any person who seeks it, regardless of if the person is an applicant of the housing allocation</p>	<p>Each application will be assessed on a case-by-case basis, and the assessing officer will determine whether an applicant should not qualify based on their unacceptable behaviour.</p> <p>No change to Scheme.</p>

		scheme or intending to make an application.	
4	<p>What if I feel like I my previous unacceptable and unreasonable behaviour has been dealt with.</p>	<p><u>Question 2 (Figure 6)</u> To what extent do you agree or disagree with the disqualification for those guilty of unacceptable or unreasonable behaviour?</p> <p>Housing allocation law allows any person that might have been previously declared as ineligible or disqualified from joining a housing allocation scheme, to reapply at any time when the matters that caused them to be ineligible and or disqualified, are no longer relevant. Therefore, applicants can reapply to the Scheme at any time they believe their conviction(s) are no longer relevant.</p>	<p>Applicants cannot be permanently excluded from applying to or joining a housing allocation scheme.</p> <p>No change to Scheme.</p>
5	<p>What actually is housing related debt and can this be made clearer in the scheme document.</p> <p>Concern that people with housing related debt will not be able to afford a home via other means.</p>	<p><u>Question 3 (Figure 7)</u> To what extent do you agree or disagree with the disqualification for those who have a housing related debt?</p> <p>The consultation draft Scheme outlined details of housing related debt, and the categories of debt that would be disregarded. t. The emphasis on housing related debt was around an applicants' willingness to address the debt and provide evidence of regular affordable payments to reduce the debt.</p>	<p>Based on consultation responses it was recognised that this part of the Scheme may be difficult to understand, and it was felt that clearer criteria was required.</p> <p>The final draft Scheme set out an approach depending on the level of debt and the decisions that will be made in relation to housing related debt.</p> <p>The Scheme still retains the emphasis on the evidence that the applicant is maintaining regular / consecutive affordable payments to reduce the debt.</p>

			Change to the Scheme.
6	Repairs are always left unattended to by the Landlord, and it is the tenants who are punished, how can this be emphasised in the scheme document in terms of repairs under this section.	<p><u>Question 4 (Figure 8)</u> To what extent do you agree or disagree with the breaching tenancy criteria?</p> <p>The consultation draft Scheme set out the areas where an applicant may have breached tenancy conditions which includes purposely failing to report repairs or failing to allow contractors to enter a property to carry out maintenance.</p>	<p>It is considered that the final draft Scheme is reasonable in its approach to possible breaches of tenancy</p> <p>No change to Scheme.</p>
7	Some people lie about not owning a property when they actually do.	<p><u>Question 5 (Figure 9)</u> To what extent do you agree or disagree with the property ownership criteria?</p> <p>The consultation draft Scheme included the consequences around withholding / providing misleading information on the housing register application.</p>	<p>The final draft Scheme includes a section (11.3) on Fraud and advice about offences in relation to applications if they deliberately withhold information, provide misleading information etc. Further information in relation to fraud has been added</p> <p>Change to Scheme.</p>
8	It needs to be clearer in the document what the exemptions are for people who already own a property.	<p><u>Question 5 (Figure 9)</u> To what extent do you agree or disagree with the property ownership criteria?</p> <p>The consultation draft Scheme provided information with regards to property ownership and what exemptions applied. See section 5.7.1</p>	<p>Exemptions to disqualification due to homeownership are set out at section 5.7.4 of the draft Scheme.</p> <p>No change to Scheme.</p>

9	Some disagree with the earnings and savings limits that are outlined in the scheme document.	<p><u>Question 6 & 7(Figure 10 & 11)</u></p> <p>To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?</p> <p>To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?</p> <p>These limits are in line with central government’s policies.</p>	<p>The Department of Work and Pensions (DWP) use the £16,000 savings threshold when determining claims for welfare benefits. The Scheme also sets out that this upper savings limit will change in line with the DWP Benefit and Pension rates.</p> <p>An income cap of £60,000 is used by DLUHC and the regulator of social housing for their policy to determine affordable rents.</p> <p>No change to Scheme.</p>
10	It would great if the scheme document outlined what income is relevant and what is not.	<p><u>Question 6 & 7(Figure 10 & 11)</u></p> <p>To what extent do you agree or disagree with the disqualification of those earning £60,000 or more?</p> <p>To what extent do you agree or disagree with the disqualification of those with savings of £16,000 or more?</p> <p>This is outlined in Appendix E on what will be considered as income.</p>	<p>No change to Scheme.</p>
11	What does ‘no housing need’ actually mean and can there be a clear criteria.	<p><u>Question 8 (Figure 12)</u></p> <p>To what extent do you agree or disagree with the disqualification of those who have no housing need?</p> <p>The consultation draft Scheme provided information on ‘no housing need’.</p>	<p>The final draft Scheme has incorporated more clarity on ‘no housing need’ and sets out that if none of the circumstances as defined in the priority bands are relevant to the applicant then they will be regarded as having no housing need.</p> <p>Change to Scheme.</p>
Section 2 – Other Matters			

1	There needs to be a definition and a clear formula of what deliberately worsening circumstances actually means and how it is evidenced.	<p><u>Question 9 (Figure 13)</u> To what extent do you agree or disagree that those who have purposely worsened their housing circumstances should be given the lowest priority?</p> <p>There is a section on deliberately worsening circumstances, this will be made clearer in the draft scheme.</p>	<p>The final draft Scheme has been changed to make it clearer on what circumstances could be considered as deliberately worsening circumstances – see section 7.22.</p> <p>Change to Scheme.</p>
2	If the applicant has evidence that shows why they refused offer, this should be considered.	<p><u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?</p> <p>The consultation draft Scheme sets out that when an offer is refused, an assessment will be made as to whether the offer was suitable. The circumstance of each refusal will be considered on a case-by-case basis. Section 9.4.3 of the Scheme sets out that Applicants have a right to request a review if they disagree with a decision.</p>	<p>The final draft Scheme is proposed to be a choice-based lettings scheme which means that many applicants will have choice over the areas in which they reside The draft Scheme has been updated to provide clear rules that apply and the process if an Applicant refuses on offer of accommodation</p> <p>Change to Scheme.</p>
3	There are risks of adopting a Scheme that allows 3 offers – this approach could result in higher refusal rates and impact on void relet time. There would also be an impact on trying to manage temporary accommodation for those owed a statutory homelessness duty.	<p><u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property?</p> <p>The consultation draft Scheme was proposing that most applicants would</p>	<p>The final draft Scheme has been amended based on consultation feedback and the risks of adopting this approach. The draft Scheme now proposals that most applicants will be entitled to two suitable offer of accommodation, except for certain exemptions: Applicants owed any of the statutory homeless duties / and those applicants who are subject to</p>

		receive 2 offers of accommodation, with the penalty on the refusal of the 3 rd offer	MAPPA will be made one suitable offer of accommodation, either through auto-bidding or a direct offer. Change to Scheme.
4	The amount of time an applicant suspended from the housing register after refusing more than 2 offers should be 6 months and not 12 months.	<u>Question 10 (Figure 14)</u> To what extent do you agree or disagree to limit the number of times an applicant is able to refuse a property? The consultation draft Scheme was proposing that following an Applicant exhausting their offer threshold, their application would be given a reduced priority – moved to Band D.	The final draft Scheme has been amended based on consultation feedback, and now proposes that once an Applicant has exhausted the applicable offer threshold, if they refuse a final suitable offer, they will be disqualified from Housing Allocations Scheme for a period of 12 months. Change to Scheme.
Section 3 – Banding			
1	There are so many categories in Band A, those in any of the other bands will never be housed.	<u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band A being awarded in these circumstances? Band A includes housing circumstances that are exceptional and an immediate need to move. Although there are a number of categories in this priority Band, the percentages of people in Band A should be relatively low.	Band A includes housing circumstances that are exceptional and an immediate need to move. Although there are a number of categories in this priority Band, the percentages of people in Band A should be relatively low No change to Scheme.
2	People in temporary accommodation should be moved into Band A.	<u>Question 11 (Figure 15)</u>	Following consultation feedback, those households who are owed a main homeless duty under s.193

		<p>To what extent do you agree or disagree with Band A being awarded in these circumstances?</p> <p>The consultation draft Scheme proposed that most statutory homelessness, including those in temporary accommodation would be placed in Band B.</p>	<p>and owed a relief duty under s.189B (2) and likely to be owed a main duty if the relief duty ends unsuccessfully and the applicant is accommodated in interim temporary accommodation are now placed in Band A.</p>
3	MAPPA applicants should not be included within the scheme.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The consultation draft Scheme had MAPPA applicants within band B.</p>	<p>MAPPA applicants will remain in Band B as their criminal involvement has to be relevant to the housing register only. This will be made clear in the new scheme document.</p> <p>No change to Scheme.</p>
4	Care leavers should be moved into Band A.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The draft consultation Scheme had care leavers in Band B,</p>	<p>The final draft Scheme has changed the priority banding for care leavers who have a duty of care accepted under the Children’s Act by the Local Authority and are ready for independent living are to be moved into Band A from Band B</p> <p>Change to Scheme.</p>
5	Why are there no homeless categories in Band A, they need to be moved here.	<p><u>Question 11 (Figure 15)</u> To what extent do you agree or disagree with Band B being awarded in these circumstances?</p> <p>The draft consultation Scheme placed all of the homelessness duties into Band B.</p>	<p>Following consultation feedback, those households who are owed a main homeless duty under s.193 and owed a relief duty under s.189B (2) and likely to be owed a main duty if the relief duty ends unsuccessfully are to move up into Band A, and the other homelessness duties remain in Band B.</p> <p>Change to Scheme.</p>

6	Band D should be removed as no one will ever be housed in this band.	<p><u>Question 11 (Figure 15)</u></p> <p>To what extent do you agree or disagree with Band D being awarded in these circumstances?</p> <p>The consultation draft Scheme included those applicants, Band D will need to remain for those people who do not fit into any of the other categories.</p>	<p>Band D incorporates a number of different categories including those applicants who are demoted. In some cases, people in band D can be housed. This band will need to remain for those people who do not get matched into any of the other bands.</p> <p>No change to Scheme.</p>
4. General			
1	Will there be some form of FAQ's set up?		FAQ's will be available for applicants which outline answers to the frequently asked questions relevant to the new housing allocation scheme document.
2	What happens if people do not bid on properties?		Section 9.2.3 of the final draft Scheme sets out that applicants are expected to bid regularly. If an Applicant does not bid, contact will be made to assess the reason and where necessary auto-bidding may be applied. Applicants who fail to respond may be removed from the Scheme

Table 2: Issues that raised the most comments

