

London Assembly Planning and Housing Committee**Combined Evidence Received:.pdf version****Investigation: Overcrowding in London's Social Rented Housing****Contents**

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Attachments: Overcrowding Monitoring Form 2009-10.xls; Tackling Overcrowding Pathfinder Programme - London Borough of Bromley; final draft Overcrowding strategy 20082010; RE: Overcrowding and under occupation report. Michel.

Further to the letter from Andrew Boff dated 21 July

Here is some info that I think will be useful for you

To get to the report follow the link and it's Allocs & waiting lists – overcrowding – CLG stats 30/6/10.

Our report only shows data for applicants in Bands A and B - i.e. those overcrowding by 2 or more bedrooms.

In terms of the questions on the second page of the letter.

1. Well it is undeniable that, at a simple level, more larger homes will help tackle overcrowding. However, in times of tight public finance (and, in reality, at any time) we should be looking to make best use of the assets available as a primary action. I.e. getting underoccupiers to down size. As social housing is becoming more like a form of welfare benefit then, like other WBs, when it is no longer needed then entitlement should cease. Perhaps not removing their security of tenure but not of the specific property they are in. Furthermore, recent changes to HB will put pressure on households seeking to rent privately in larger properties thus increasing need to make better use of what we have got - and proposals to reduce HB for social housing underoccupiers will actually make more people downsize and so the effects of this need to be factored in to any decisions about how much more new larger housing is needed. In fact more smaller units meeting the particular needs of older social housing underoccupiers might actually be needed and thereby create the amount of larger units that are needed.

2. Obstacles are grant rates, grant availability and developers not wanting this type of housing on mixed tenure developments - usually because of their views of the type of households and children who occupy such housing.

3. Mayor's target needs to be reconsidered in light of any plans to reduce HB for social housing underoccupiers as per point 1 above. In any event, a target is all very well but it takes time to have any effect given that there will be a large number of planning permissions in the pipeline for schemes not including this level of larger units.

4. Answer is same as in 1 above. Why not build good homes attractive to underoccupiers and fund practical help for them to move.

Appendix questions -

- Economics - would need a lot more grant to entice developers with existing planning permissions and land holdings all put together based on a lot more smaller units - to then switch to having less units which would equate to less profit as less units to sell. Would create unviable schemes.
- Budget reductions implications - quite simply would result in less larger unit supply - unless the underoccupation HB rules end up with a lot of underoccupiers moving.
- Mayor can seek to increase grant rate - would require a reduction in total unit target. Mayor could also fund incentives to help people move.
- Mayor needs to consider the effects of HB changes on social housing underoccupiers.
- Regional Planning policy could require a minimum percentage of larger units but takes time to develop the policy and does not overcome all the sites in the pipeline

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Grant 2007/08 Overcrowding Data Monitoring Report

Local Authority: London Borough of Bromley	Submitted by:	Date: 01/04/10
Contact Number:		

Please read the attached explanatory notes before completing this form. The numbering of the notes accords with the question numbers used in the form (shown in column A). When complete, please return this form by email to: shireen.madon@communities.gsi.gov.uk

A. Baseline Figures as at 01/04/09

Overcrowded households on waiting lists / all tenures						
1. Overcrowded households from all tenures on both LA and RSL waiting lists wanting to be re-housed as on 01/04/09			On LA waiting list	On RSL waiting lists	Total on 01/04/09	
Question 1	No. of households recorded as overcrowded by the Bedroom Standard	Total	319	0	0	
Question 1a	Of these households how many are currently living in each size of accommodation?	1 bed	total overcrowded	119		
			of whom severely o/crowded	27		
		2 bed	total overcrowded	115		
			of whom severely o/crowded	43		
		3 bed	total overcrowded	76		
			of whom severely o/crowded	25		
Question 1b	Of these households, how many are existing social tenants seeking a transfer?		230			
 of whom, the number that are severely overcrowded		86			
Question 1cand how many are new applicants seeking social housing?	from Private Rented Sector	83			
		from Owner Occupation	7			
		Check total (1b+1c)	319	0	0	
			if cell is red it's because the check total differs from the total in E12	if cell is red it's because the check total differs from the total in F12	if cell is red it's because the check total differs from the total in G12	if any of these cells are red please correct as appropriate

Under-occupied households on waiting list and wanting to downsize					
2. Under-occupied social renters on both LA and RSL waiting lists wanting to be re-housed as on 01/04/09			On LA waiting list	On RSL waiting lists	Total on 01/04/09
Question 2	No. of households recorded as under-occupied by the Bedroom Standard	Total	35	0	0
Question 2a	Of these households how many are currently living in each size of accommodation?	3 bedrooms	29		
		4 bedrooms	5		
		5+ bedrooms	1		

B. Impact on Temporary Accommodation, April 2009 to March 2010**Overcrowded households moving into Temporary Accommodation**

3. Impact on Temporary Accommodation			Quarter 1 (1/4/09 - 30/06/09) Due 28 Jul	Quarter 2 (1/07/09 - 30/09/09) Due 28 Oct	Quarter 3 (1/10/09 - 31/12/09) Due 28 Jan	Quarter 4 (1/01/10 - 31/03/10) Due 30 Apr	
Question 3	No. of overcrowded households accepted as homeless and provided with temporary accommodation during each quarter		Total				
				0	0	0	0
Question 3a	Before moving into Temporary Accommodation, what sized accommodation did these households occupy?	1 bed	total overcrowded	0	0	0	0
			of whom severely o/crowded	0	0	0	0
		2 bed	total overcrowded	0	0	0	0
			of whom severely o/crowded	0	0	0	0
		3 bed	total overcrowded	0	0	0	0
			of whom severely o/crowded	0	0	0	0
		4+ bed	total overcrowded	0	0	0	0
			of whom severely o/crowded	0	0	0	0
Question 3band what housing tenure did they come from?	Social Rented Sector		0	0	0	0
		Private Rented Sector		0	0	0	0
		Owner Occupation		0	0	0	0
		Check total (for 3b)		0	0	0	0
			if cell is red it's because the check total differs from the Q1 total in E39	if cell is red it's because the check total differs from the Q2 total in F39	if cell is red it's because the check total differs from the Q3 total in G39	if cell is red it's because the check total differs from the Q4 total in H39	If any of these cells are red please correct as appropriate

Overcrowded households in TA: when moved into settled accommodation

4. Number of homeless households moved into Temporary Accommodation in each quarter against the quarter in which they were moved into settled accommodation		Of all households moved into TA after 01/04/09, how many were moved into settled accommodation in each quarter?					Check total	
		into settled accomm. in Q1	into settled accomm. in Q2	into settled accomm. in Q3	into settled accomm. in Q4	still in TA		
Question 4	homeless households moved into TA during Q1	on Housing Benefit	N/A	N/A	N/A		0	if cell is red it's because check total differs from Q1 total in E39
		not on Housing Benefit						
	homeless households moved into TA during Q2	on Housing Benefit					0	if cell is red it's because check total differs from Q2 total in F39
		not on Housing Benefit						
	homeless households moved into TA during Q3	on Housing Benefit					0	if cell is red it's because check total differs from Q3 total in G39
		not on Housing Benefit						
	homeless households moved into TA during Q4	on Housing Benefit					0	if cell is red it's because check total differs from Q4 total in H39
		not on Housing Benefit						
							If any of the above cells are red please correct as appropriate	

C. The number of overcrowded households added to the waiting list and the number re-housed, April 2009 to March 2010

Overcrowded households added to the waiting list in each quarter

Question 5a	5. The number of overcrowded households seeking a transfer and added to the waiting list in each quarter		Local authority waiting list				RSL waiting list(s)			
			Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
			Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 5a	Total number of overcrowded social households added to the waiting list in each quarter		34	57	10	19				
 of whom, the number that were severely overcrowded		12	27	4	11				
Question 5b	Total number of households seeking social housing because of overcrowding	from Private Rented Sector	15	20	13	17				
		from Owner Occupation	0	2	0	0				

Overcrowded households re-housed in each quarter into the social rented sector

Question 6a	6. The number of overcrowded households re-housed in each quarter into the <u>social</u> rented sector		Local authority waiting list				RSL waiting list(s)			
			Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
			Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 6a	Total number of overcrowded social households re-housed in each quarter into the social rented sector		36	74	23	22				
 of whom, the number that were severely overcrowded		5	2	3	2				
Question 6b	Total number of overcrowded households from outside the social rented sector re-housed in each quarter	from Private Rented Sector	9	31	62	53				
		from Owner Occupation	0	0	0	0				

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Overcrowded households re-housed in each quarter into the private rented sector

7. The number of overcrowded households re-housed in each quarter into the <u>private</u> rented sector	Local authority waiting list				Local authority waiting list			
	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 7a Total number of overcrowded social households re-housed in each quarter into the private rented sector	2	3	3	1				
..... of whom, the number that were severely overcrowded	1	3	3	1				
Question 7b Total number of overcrowded households from outside the social rented sector re-housed in each quarter	from Private Rented Sector	9	7	1	5			
	from Owner Occupation	0	0	0	0			

D. The number of overcrowded households in the social sector who received a housing options visit, April 2009 to March 2010

Overcrowded households visited

8. The number of overcrowded households visited in each quarter	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 8a Total number of housing options visits to overcrowded social households	19	21	24	10
..... of whom, number of visits to severely overcrowded households	3	14	8	5
Question 8b Number of overcrowded social households who accepted in-situ solutions	2	6	3	1
..... of whom, the number that were severely overcrowded	2	6	3	1

E. Under-occupied households applying to downsize and the number re-housed, April 2009 to March 2010

Under-occupied households applying to downsize and the number re-housed

Question 9	9. The number of under-occupied households applying to downsize in each quarter		Local authority waiting list				RSL waiting list(s)			
			Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
			Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
	Number of households applying for a transfer due to under occupation	Total	10	7	8	12	0	0	0	
Question 9a	Of these households how many are currently living in each size of accommodation?	3 bedrooms	10	5	7	9				
		4 bedrooms	0	1	1	3				
		5+ bedrooms	0	1	0	0				

10. Under-occupied households re-housed in each quarter	Local authority waiting list				RSL waiting list(s)			
	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr

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Question 10	No. of under-occupied households rehoused into suitable accommodation	Total							
			6	14	7	11	0	0	0
		3 bedrooms	4	13	6	8			
		4 bedrooms	1	1	1	2			
Question 10a		5+ bedrooms	1	0	0	1			

F. Update figures as at 01/04/10

Overcrowded households on waiting lists / all tenures					
11. Overcrowded households from all tenures on both LA and RSL waiting lists wanting to be re-housed as on 01/04/10 (Bands A&B only)		LA waiting list	RSL waiting list(s)	Total as at 01/04/10	
No. of households recorded as overcrowded by the Bedroom Standard **NB - Currently against local standard.		Total			
		399	0	0	
Question 11a	Of these households how many are currently living in each size of accommodation?	1 bed	total overcrowded	155	
			of whom severely o/crowded	35	
	2 bed		total overcrowded	142	
			of whom severely o/crowded	55	
	3 bed		total overcrowded	90	
			of whom severely o/crowded	34	
	4+ bed		total overcrowded	12	
			of whom severely o/crowded	5	
Question 11b	Of these households..... how many are existing tenants seeking a transfer?			146	
 of whom, the number that are severely overcrowded			67	
Question 11cand how many are new applicants seeking social housing?	from Private Rented Sector		245	
		from Owner Occupation		8	
	Check total (9b+9c)			399	0
		if cell is red it's because the check total differs from the total in E133	if cell is red it's because the check total differs from the total in F133	if cell is red it's because the check total differs from the total in G133	If any of these cells are red please correct as appropriate

Under-occupied households on waiting list and wanting to downsize				
12. Under-occupied households on both LA and RSL waiting lists wanting to be re-housed as on 01/04/10		LA waiting list	RSL waiting lists(s)	Total as at 01/04/10
No. of households recorded as under occupied by the Bedroom Standard		Total		
		49	0	0
Question 12a	Of these households how many are currently living in the following accommodation	3 bedrooms	41	
		4 bedrooms	7	
		5+ bedrooms	1	

Overcrowding Pathfinder funding 2010/11

1. Action Plan

The current Overcrowding Action Plan, which has been endorsed by Members, is attached with an update on progress as at the end of quarter 3 2009/10. This shows that progress continues to be made against the action plan. The key focus continues to be engagement of the most overcrowded households to test the toolkit which has been developed in order to work with these families to consider the options available to them to either resolve or alleviate the impact of overcrowding. This focus also extends to those under occupying social housing as a means to make best use of the available accommodation.

To date, through this scheme 504 households have been assisted. This assistance has been offered in the form of moves to social and private tenancies as well as the provision of in situ solutions. This continue to be an area for development and the success of the current scheme must be adapted and continued to ensure that the best use is made of all available resources and for the benefit of those require suitable accommodation.

2. A Reduction of Overcrowded Households in the Social Sector

A) Employing and retaining a dedicated officer

Prior to receiving funding we participated in a pilot scheme in conjunction with the Bromley Federation of Housing Associations. This has enabled a review of the pilot and the establishment of the scheme in its current format. The current funding has allowed us to employ a dedicated officer who offers assistance to both overcrowded and under occupied households. The purpose of this role is to offer:

- A hand holding service providing assistance with paper work and acting as an advocate on their behalf.
- Personally taking eligible clients through the options available to them, such as moves to the private rented sector or moves out of the borough for example the “homes out of London” initiative.
- Financial assistance; for under-occupiers this is £500 for each room that they downsize as well as additional help towards removals / re-location costs. For overcrowded households this is assistance with moves to private rented accommodation such as deposits or rent in advance. As well as assistance towards storage solutions or renovations to a current home.
- Training and imparting of information to RSL partners.
- A direct link for RSL's to identify households and to co-ordinate awareness events, mail outs and advertising.

B) Running and maintaining a joint housing register

As developed within the first year of the pathfinder we now maintain a joint housing register that serves ourselves and Affinity Sutton, formally Broomleigh Housing Association. This gives the ability to record the levels of overcrowding for the largest RSL provider in the borough and those registered direct with the local authority under one assessment framework giving consistency of data.

As part of the review of the housing register and allocations policy we propose to review the options available to overcrowded and under-occupation households. The current policy gives generous priority to those that are living in overcrowded or under-occupied accommodation however many housing options are limited to those that are most severely affected. Please see progression in 2010/11 for details of the proposed changes.

C) Utilising the private rented sector:

8 x social tenants housed into the private sector in Q1/2/3 in 2009/10
6 x social tenants housed into the private rented sector 08/09.

In order to strengthen and improve links with the private sector landlords the Housing Initiatives team runs an annual landlords forum. This offers us the opportunity to keep landlords abreast of any legal or statutory updates and gives landlords the opportunity to engage with the local authority and share best practice as well as look for resolutions to common difficulties.

In utilising the private sector we have been able to avoid accepting any households as homeless on the grounds of overcrowding and have offered moves to the private rented sector as both a means to alleviate overcrowding and prevent homelessness.

We also seek to assist adult siblings living in overcrowded households to move into the private rented sector to alleviate overcrowding.

3. Making Best Use of Stock by

A) A reduction of households under occupying in the social housing sector.

Numbers visited by the Under Occupation and Overcrowding Officer:

- Qtr 1 09/10 – 7 x Overcrowded and 12 x Under Occupiers
- Qtr 2 09/10 – 10 x Overcrowded and 17 x Under Occupiers
- Qtr 3 09/10 – 9 x Overcrowded and 11 x Under Occupiers

We work closely with the SELHP's co-ordinator and since Q4 of 2009/10 have begun to use the toolkit she has devised when undertaking options visits.

Numbers housed in Q1/2/3 2009/10:

Under Occupiers:

27 x households freeing up 3 bedroom accommodation or larger

11 x households freeing up 2 bedroom accommodation

13 x households freeing up 1 bedroom accommodation

Numbers housed in first 3 quarters 09/10:

Overcrowded Households:

133 x social tenants overcrowded by 1 bedroom

10 x social tenants severely overcrowded

B) An effective allocation framework – maximising the use of chain lets from under occupation voids.

In conjunction with the Allocations policy we are able to prioritise under occupiers whose accommodation is needed to meet local demand. Following assistance, from a dedicated officer, to help them to move their property is subsequently advertised with preference given to another social tenant.

The lettings plan, which is reviewed and revised annually, also allows us to ensure that a number of suitable properties can be advertised with a preference going to those under-occupying accommodation. This in conjunction with the review of the housing register and Allocations policy will help to further increase the focus on this scheme.

The policy also enables priority to be given to under occupying social tenants from out of borough wishing to move to LBB where a reciprocal is agreed with the host borough or RSL.

C) Maximising opportunities in partnership with local Social Landlords (RSL's)

As an LSVT partnership working with local RSL's is paramount to making best use of resources. We work at both a strategic and operational level with the Bromley Federation of Housing Associations and South East London Housing Partners.

The current action plan and strategy was developed in partnership with the Bromley Federation of Housing Associations and there is an ongoing commitment to this programme within their business plan and they receive regular reports and feedback. At an operational level this is also monitored and progressed through the CBL user group.

Breakdown of spend in 2008/10

- £67,285 staffing costs
- £21,055 assisting under occupiers to move/relocate
- £7,845 assisting overcrowded households to move/relocate
- £5,100 private rented sector options
- £505.49 in-situ solutions
- £2,500 advertising / leaflets
- £9,630 projected costs for Q4
- £10,000 IT upgrade for monitoring
- £60,000 assisting works to remain in situ
- £30,000 identified for renovation/extension to current home

Total £213,920.49

Carry forward £63,920.49

Progression in 2010/11 – new areas which are currently being built into the updated action plan.

- In line with the changes to the code of guidance review the priorities awarded to overcrowded and under occupying households.
- Continue a rolling plan of visits targeting the most severely overcrowded households i.e those lacking two or more bedrooms. Continue to visit under occupiers residing in the most in-demand accommodation and those who are looking to move from general needs to sheltered accommodation. Targets for the number of moves will be based on the baseline figures gathered in Q1 2010/11.
- Through on-going liaison with the Bromley Federation of Housing Associations encourage all RSL providers to join a common housing register with the aim being to be able to have one format for assessment and to enable us to clearly identify levels of overcrowding and under occupation across the borough.
- Increase the potential for offering housing options via the Bromley Homeseekers website through the advertisement of private rented accommodation alongside advertisements of social tenancies. A module is being developed by the CBL provider and will be available to purchase in 2010/11. There is also the potential to offer a matching / mutual exchange service.
- As part of the policy review we intend to extend the sons and daughters scheme, which was previously offered by Broomleigh Housing Association, to all RSL partners. The scheme offers junior

householders in overcrowded social housing the opportunity to move into alternative accommodation in either the private or social sectors. Also exploring the possibility of junior households sharing in the private sector; this has been trialled in a handful of cases but a more extensive pilot would need to be undertaken to fully explore this as an option. Additional funding would be required to improve access to the private rented sector for junior households who would normally only qualify for band C under the current policy.

- Continue to improve links with local landlords and lettings agents through the implementation of a Housing Initiatives and Landlord focus group.
- Under Occupation and Overcrowding Officer to work with RSL's to identify all overcrowded and under occupying households not currently registered for transfer in order to contact them and explore their options to move to more suitable accommodation. This is also required to better understand the extent of the levels of overcrowding and under occupation within the borough in order to best evaluate the progression of the scheme in future years.
- Offering a selection of properties secured through the Temp to Settled initiative to overcrowded households.
- Piloting the Fraud Initiative and prioritising "more desirable" street properties for under-occupiers and overcrowded households. As part of their own fraud initiative pilot colleagues in Southwark reported that the exercise had freed up a number of "more desirable" street properties. We believe that this can be replicated within our borough and lead to a better use of the existing stock.
- To explore options with partner RSLs to fund renovation/extension work for households needing to remain in current accommodation.
- Work with Development to feed into new built schemes for under-occupiers.
- Options day and building chains of moves.

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
1	To develop the Anite Housing System to enable recording and reporting of overcrowding information	Improved data for levels of overcrowding to fulfil reporting requirements and enable targeted action	Current system does not fulfil reporting requirements and cannot provide information for all levels of overcrowding.	System development and operational by June 08	Completed	Further updates scheduled for anite including migration to Northgate. Project manager appointed / start date April 2010.	Migration to Northgate system - anticipated completion end of Q3. Roll out to remaining RSLs to complete CHR.	Head of Housing Needs / Group Manager Housing Solutions & Initiatives
2	Combine Broomleigh Housing Association and LBB Housing Register and re-register all applicants to collect required data	Improved data for levels of overcrowding to fulfil reporting requirements and enable targeted action	Information currently not held and potential duplication between systems	Re-registration and common registered work to be completed by Sept 08 as part of CBL implementation	Completed	N/a	N/a	CBL project group
3	To introduce automated housing register auto banding to facilitate roll out of the combine register to key RSLs	Improved data for levels of overcrowding showing holistic picture across RSLs operating within the borough	RSLs currently hold own waiting lists RSLs tenants can also apply to go onto the Council's housing register. Information is therefore not consistent and may involve a level of duplication.	Auto banding to be operation by Q4 2009/10	Project commissioned and action plan in place to work towards implementation in Q4	Put on hold due to proposed IT migration/upgrade. Project manager now appointed and work to commence in Q1 2010/11	Project commissioned and action plan in place to work towards implementation in Q3. Once implementation to new IT system has been completed, to commence work to encourage u/o to register.	Group Manager Housing Solutions & Initiatives.

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
4	Roll out of common register to RSLs	Improved data for levels of overcrowding showing holistic picture across RSLs operating within the borough	RSLs currently hold own waiting lists RSLs tenants can also apply to go onto the Council's housing register. Information is therefore not consistent and may involve a level of duplication.	Roll out to commence Q4 09/10	Not yet due to commence	N/A awaiting implementation of automated banding.	Roll out to RSLs - date to be agreed once migration to Northgate completed.	CBL project manager / Group Manager Housing Solutions & Initiatives
5	To research and establish information held by other RSLs and also Residential Services	To gain a wider understanding of overcrowding levels and enable future prediction of trends	Some RSL tenants already registered on LBB HR, EHS liaise on case-by-case basis.	Work to be completed by Oct 08	Protocol established and operational to refer case to Housing Needs	Ongoing	As above with a view to all major RSL tenants requiring a move being included on Housing Register in 2011/12.	Head of private sector team, Chair of BFHA
6	Establish multi-agency project board to oversee development, implementation and monitoring of Overcrowding strategy	Commitment gained from respective organisations to achieve reductions in overcrowding levels	No established leads or common approach to tackling overcrowding	Project board to be established by July 08 as sub-set of the Homelessness Forum		Ongoing	Implementation & monitoring mechanisms established through Housing & Residential Services Management Team & Bromley Federation, with no additional board now required. Revised action plan to be presented to Bromley Federation and PDS for endorsement.	Head of Housing Needs

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
7	To set targets for tackling overcrowding for various initiatives against baseline	Commitment gained from respective organisations to achieve reductions in overcrowding levels	No clear targets set, cases not monitored precisely against overcrowding levels	Produce targets and agree formal sign off through project boards and member approval in autumn cycle.	Annual Targets in place and agreed through the Portfolio Holder's annual business & performance plan.	Review currently underway to set targets for 10/11 to be signed off by portfolio holder.		Head of Housing Needs
8	Establish dedicated staffing resources for overcrowding / under occupation.	Central point of contact to undertake visiting, develop and implement options assessments to reduce levels of overcrowding against targets set.	No dedicated lead or procedures set up for visiting/options interviews especially for overcrowded households	In post by Sept 08	Officer in post.	Officer still in post	Review responsibilities / work undertaken. Looking to increase knowledge/capacity across Solutions team and RSLs.	Housing initiatives Manager
9	Undertake a review of the Allocations Policy to ensure it provides the flexibility & priority required to support the overcrowding	Increased number of households moving to suitable accommodation, increased number of properties released through	System does have reasonable preference categories for overcrowding but not monitored specifically	All overcrowded households assisted via reasonable preference and not homelessness route	Completed	Completed.	Review scheduled following publication of new Code of Guidance to commence April 2010.	Group Manager Housing Solutions & Initiatives.

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
	strategy	under occupation moves.		Policy review completed by July 08 Targets set within allocations plan to monitor move-on for overcrowding.				
10	Develop publicity, mailshot material and visiting schedule to undertake options interviews for most severely overcrowded and under occupying households.	Increased take-up of options to reduce overcrowding levels	Numbers assisted through options scheme	See annual targets	<p>Awareness raising and publicity materials in place including: Leaflets on schemes, advertising schedule within community papers, RSL magazines and attendance at various events including the older people's day, homelessness forum etc.</p> <p>Website updated to promote Underoccupation/overcrowded schemes and raise awareness of potential solutions.</p>	<p>Operated a stand at the Older Peoples day 1/10/09. Advert placed in Volunteering Opportunities and Hospital Information booklet 2009/10. Presentations made at the Homeless forum, CBL User Group and Bromley Federation of Housing Associations. U/O information in RSL newsletters.</p> <p>Content / contacts on bromley.gov website reviewed & amended.</p>	<p>Revised leaflets to be published and distributed, e.g. GP surgeries, day centres etc. Communications plan to be implemented to continue to increase awareness including booklets as before and liaising adult social care to ensure representation at all events.</p> <p>Amend / increase info on the Bromley Homeseekers website to encourage moves to more suitable accommodation.</p>	Housing initiatives Manager & Housing Solutions and Initiatives Group Manager

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
						60 visits undertaken.	All severely overcrowded and under occupying households to receive options interview / visit via rolling programme of monthly targets.	
11	Establish options toolkit for small works, prs etc to use at options interviews	Increased take-up of options to reduce overcrowding levels	Numbers assisted through options scheme 07/08	Toolkit to be developed by Oct 08	A basic toolkit approach has been established based upon the housing options process. This needs to be formalised and combined into Destin Solutions during Q2 09/10.	Formal procedure established & in place.	Review / update toolkit	Housing Initiatives Manager & Under Occupation and Overcrowding Officer
12	Training for staff overcrowding and under-occupation targets, action plan and toolkit	Increased take-up of options to reduce overcrowding levels	Inconsistent awareness	TBC	Induction & training have been completed for the dedicated post, together with sessions at the CBL user group, homelessness forum and Bromley federation of Housing Associations.	N/A - completed	Provide leaflet / guidance for Housing Register and RSL staff	Housing initiatives Manager
13	Prevent overcrowding in temporary accommodation	Ensure all long term temporary accommodation placement are initially of a suitable size	Baseline to be established from current occupancy	No households placed into long term temporary accommodation which is overcrowded form onset unless in am emergency	On-going monitoring is in place to ensure no household is placed into severely overcrowded conditions.	On-going monitoring is in place to ensure no household is placed into severely overcrowded conditions.	On-going monitoring is in place to ensure no household is placed into severely overcrowded conditions.	Group Manager Housing Options & Assessments / Team Manager Emergency Placements.

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
14	Commence work with BHA to reconfigure hostel provision	Reduce level of overcrowding in hostel accommodation, providing self contained units	Baseline to be established against current occupancy	No households to be overcrowded at time of placement unless in an emergency	Transfer to Broomleigh completed Jan 09. Refurbishment work has commenced and the project is now well underway & on track to complete against target timescales.	Decants / refurbishment on schedule.	Work due to be completed as per project plan by end 2010/11.	AD housing, BHA – Julie Schoon/Group Manager Housing Solutions & Options/Assessment
15	In liaison with planning continue to secure larger family sized units on all s106 and new affordable housing schemes	Increase the supply of larger family sized accommodation	HC target achieved	To continue to achieve at least 35% in line with the HC target	40 units completed	44 units. 33 x 3 bed and 11 x 4 bed. A further 23 expected to complete in Q4 17 x 3 beds, 3 x 4 beds and 3 x 5 beds.		Head of Development & Strategy
16	Agree protocol with Tower (local Homebuy agent for the prioritisation of overcrowded applicants or siblings sharing accommodation which is overcrowded	Reduce overcrowding through access to shared ownership for overcrowded families or adult children living sharing with families in overcrowded conditions	Data required form Tower if able to do so.	tbc	<<Update needed of timescales>>>	Through SELHP's liaison priority is given in accordance to Housing Register priority (or comparable priority if not registered) this means that where a priority is awarded for overcrowding it translates to Homebuy. Shared ownership day held.	Review with L&Q to explore further options to promote shared ownership to o/c / u/o households.	Head of Development & Strategy
17	Continue to promote the sons & daughters scheme	Reduce overcrowding by facilitating move on for adult children sharing with family in overcrowded conditions		tbc	11 achieved. Procedure to be reviewed as part of auto banding implementation during Q3 09/10	Put on hold due to proposed IT migration/upgrade. Project manager now appointed and work to commence in Q1 2010/11	To seek to roll out across RSLs once Northgate migration complete.	BHA – Julie Schoon, Group Manager Options & Assessments

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
18	Release 3+ bedroom properties through the under occupation scheme and ring fence these properties for overcrowded social housing tenants. Including promotion of SELHP scheme	Increase the number of RSL properties available for overcrowded households	3 x 4+ bed released Q3&4 07/08	5 x 3+ properties released and targets at severely overcrowded households	19 properties released.	Total of 27 under-occupiers moved in Q1/2/3 23 x 3 beds 3 x 4 beds 1 x 5 bed	Increase to 40 moves in 2010/11. Also review with SELHP to increase LBB targets in this scheme.	Group manager Housing Solutions and Initiatives & Housing Initiatives Team Manager
			Baseline form SELHP scheme					
19	Promote take up of private rented sector accommodation to relieve overcrowding through use of rental deposits/incentive schemes	Increase the number of overcrowded households moving to suitable accommodation	Baseline 07/08 figures	10	13 households assisted	11 x households accepted in-situ solutions. 133 x overcrowded social tenants moved to larger accommodation. 102 x overcrowded applicants outside of the social sector moved.	TBA - LC to include provisional targets.	Housing Initiatives Manager / Housing Solutions Team Manager & Group Manager Housing Solutions and Initiatives.
20	Explore options for funding resources including potential RSL contributions	Increase resources to reduce overcrowding levels – more households assisted into suitable accommodation works undertaken to create more space	No current funding available	Scheduled to commence Q3 2009/10	2 referrals have currently been made within architect plans and costing for larger works. These are being used to assess potential for funding	Total of 3 cases referred / assessed. Total estimated costs of total cost approximately £100,000 (2 loft conversions £15,000 - £20,000 each and a side extension - £60,000). Unable to proceed due to lack of RSL funding.	TBA - explore funding options with RSLs.	Assistant Director Housing & Residential Services
21	To seek to acquire larger family sized	Increase the number of	New scheme previously targeted		6 x 3 bed properties acquired during 2008/09.			BHA/Town & Country/Ad Housing

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
	units through temp to settled scheme	overcrowded households moving to suitable accommodation	at homeless households and smaller units		Funding for phase 2 successful and work underway to identify provider	10 x properties acquired. survey's pending. 5 x 3 beds (5 x 2 beds)	Targets to be agreed in conjunction with Property Development Service.	
22	To seek to promote specific properties for overcrowded households through CBL	Increase the number of overcrowded households moving to suitable accommodation	CBL not operational	Launch Sept 08. Target to be set within allocations plan	2009/10 Allocations plan includes targets for overcrowding & Underoccupation	Continue to monitor through implementation of annual lettings plan on conjunction with RSL provider.	Revise % of properties made available to this category of bidder.	Housing Solutions Team Manager / Group Manager for Housing Solutions & Initiatives.
23	To explore potential to promote chain moves through CBL	Increase the number of overcrowded households moving to suitable accommodation	CBL not operational	Launch Sept 08. Target to be set within allocations plan	Work to commence Q3 2009/10	Discussions held with Affinity Sutton & pilot agreed. Voids freed up as a result of Under-Occupation scheme advertised with preference to overcrowded households. Subsequent void also offered to social tenant.	Pilot Q3 2010/11 pending Northgate migration.	Group Manager Housing Solutions/CBL user group.
Targets 2010/11	Revise priority awarded to overcrowded and under occupying households.	Greater opportunity for applicants to live in more suitable accommodation and have access to more extensive range of housing options.	Needs to be reviewed	Q4 2010/11	N/A			Head of Housing Needs / Group Manager Housing Solutions & Initiatives
	Continue a rolling plan of visits to most severely affected households	Increased uptake of housing options / moves to alternative accommodation / acceptance of in situ solutions.	Previous years data to be reconciled at end of Q4 2009/10. Progress to be made with all RSL's to identify qualifying households.	Data reconciliation Q1 2010/11. Work with RSL's ongoing throughout year.	N/A			Under Occupation & Overcrowding Officer / Housing Initiatives Team Manager

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
	Roll out programme in partnership with the Bromley Federation of Housing Associations to encourage RSL's to join common housing register	Consistency of data recorded / true picture of need within the borough / one route for application	Information currently not held and potential duplication between systems	Ongoing	N/A			Head of Housing Needs / Group Manager Housing Solutions & Initiatives
	Upgrades to Bromley Homeseekers website including private rented and mutual exchange modules.	greater interaction for clients / one stop shop for information.	N/a	Possible implementation dates to be confirmed by CBL provider.	N/A			Auto-Banding Project Manager / Group Manager Housing Solutions & Initiatives
	Extend Sons & Dtrs Scheme and further widen the options available to junior households	Reduction in number of over-crowded households	To be compiled	Q2	N/A			Group Manager Housing Solutions & Initiatives / Team Manager Housing Solutions
	Improve links with Landlords & Lettings agents	Greater opportunity for moves to good quality private sector accommodation. Reduction of overcrowded and under occupied households	To be compiled at end of Q4 2009/10	Set up landlord / LBB focus group.	N/A			Group Manager Housing Solutions & Initiatives / Housing Initiatives Team Manager
	Adverts for Temp to Perm Scheme properties to be extended to include overcrowded households	More choice through social housing / increase in available stock for letting.	Funding finalised in Q4 : aiming to secure 20 properties by end of year and a further 30 in 2010/11	% to overcrowded households to be agreed.	N/A		Development in negotiation with provider for an increase to the number of units planned in 2010/11	Head of Housing Needs / Group Manager Housing Solutions & Initiatives

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
	Pilot for Fraud Initiative - properties freed up to be advertised for under occupiers and overcrowded households.	More choice through social housing / Make best use of existing stock.	N/A New pilot to commence in 2010/11		N/A			Head of Housing Needs / Group Manager Housing Solutions & Initiatives
	Continue to work closely with RSL's / SELHP's to improve options available in particular look at ways of expanding renovations / extensions to current homes.	Less disruption to households / enhancement of existing stock	To be compiled		N/A			Head of Housing Needs / Group Manager Housing Solutions & Initiatives
	Continue to work with Development to feed into new build schemes for under occupiers	Properties targetted to the needs / requirements of under occupiers thereby increasing likelihood of scheme take up	N/a		N/A			Head of Housing Needs / Group Manager Housing Solutions & Initiatives
	Organise Housing Options / Chain moves Day	greater publicity / interactive forum for eligible households / increase in take up of housing options.			N/A			Under Occupation & Overcrowding Officer / Housing Initiatives Team Manager
Completed achieved	/							

	Action	Expected Outcome	Baseline data	Target	Update 2008/09:	Update January 2010	Actions for 2010/2011	Responsible officer
Work underway & on track								
Work not yet due to start								
Behind schedule/not achieved								

London Borough of Bromley

Overcrowding & Underoccupation Strategy 2008 - 2010



1. Introduction

“Living in overcrowded accommodation can, both directly and indirectly, have a devastating effect on families. Under-achievement at school can be caused by lack of space for children to do their homework. Absence rates may be higher because of illness associated at least in part with poor living conditions. Older children may spend more time outside the home, on the streets, simply to find privacy and space. Overcrowding may exacerbate stress, depression and in the worst cases domestic violence or breakdown of relationships.”¹

The legal definition of overcrowding is quite strict and although people may feel their property is too small in relation to the number of people who live there, it may not be classed as statutorily overcrowded. However Communities and Local Government (CLG) Action Plan – ‘Tackling Overcrowding’, state that there are a number of negative social issues that can arise from overcrowding which include domestic violence and it can also lead to anti-social behaviour. Overcrowding is strongly linked with poverty and therefore requires intervention from the Government, Local Authorities, Housing associations and other key partner agencies to assist and support households to improve their housing conditions. Partnerships with Health Authorities are also crucial to support the health and wellbeing of overcrowded households.

The Introduction of Local Housing Allowance in April 2008 is one way identified by the Government to tackle overcrowding giving households the opportunity to move to more suitable accommodation, through guided rent levels for specific bedroom sizes.

2. Local

The Council along with its housing Association partners are committed to proactively tackling overcrowding. This strategy aims to ensure the delivery of a comprehensive approach to tackling overcrowding and relieving the far-reaching negative impact it can have upon families living in overcrowded conditions. This will be achieved through a number of creative and flexible initiatives including:

- Under-occupation schemes to release family sized properties
- Increasing supply through new build developments and the private sector
- Improving access across the different sectors of the housing market
- Commissioning extensions and deconversions or other works to create more space to relieve the pressures of overcrowded conditions
- Bringing empty properties back into use

3. Overcrowding within the Sub regional

2.1 In South East London, those who rent in the private sector are most likely to be overcrowded, followed by those who live in social housing rented properties. In the private rented sector, affordability would be a contributory factor causing

¹ Tackling overcrowding in England, An action plan – CLG Dec 2007

households to live in overcrowded conditions. Those in the South East, who own their own home without a mortgage are least likely to be over-crowded but one fifth are more probable to be under-occupied. BME households are much more likely to live in overcrowded conditions. 3.2% of White British households are overcrowded in the sub-region compared to 26.7% of Black African households and 13.5% for Black Caribbean.

Overcrowding/under-occupation by Tenure in South East London						
	Council rented	RSL rented	Owner Occupier (No mortgage)	Owner Occupier (with mortgage)	Private rented	Total
Overcrowded	28%	11.3 %	7.4%	22.3%	31%	100%
Underoccupied	5%	2%	43%	43%	7%	100%
Source: London and sub-regional support studies p. 275-277 (year 2005)						

4. Under-occupation

The CLG report that there are an estimated 69,000 people under-occupying properties in the Social rented sector in London. There are a number of factors to suggest that there would be quite a high number of under-occupiers within the Borough of Bromley. This would include the high number of elderly residents within the Borough who tend to remain in their homes, for many decades after the family may have grown up and left, consequently under-occupying the property. The need to free up the family homes, to let to households on the housing register is balanced against the supply and types of new properties and re-lets in desirable areas. Under occupation pilots in the Borough suggest that people are willing to move but to types of properties (houses and bungalows) and areas which are usually those in high demand. The development of the Council's Under Occupation scheme is important to create movement in social housing to free up larger accommodation.

5. Housing Supply and need of larger properties

In the London Borough of Bromley the supply/ of larger housing association properties, can be intermittent and result in households having to wait a number of years, to resolve their housing need. The table in figure 1 shows housing association lettings to 4 and 5 bedroom properties. This reveals a substantial and unmet need for larger homes and also a backlog of unmet need. There is an urgent requirement to develop options to provide larger homes. The Housing Development forecast indicates the earliest possibility of 4 x 5 bedroom, social rented properties, may be completed in the Borough by Dec 2010.

Figure 1 - London Borough of Bromley, Lettings 2009/10

	LBB Nominations	Housing Association direct lettings
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3 Bed	139	18
4+ bed	34	2
Total	173	20

5.2 Housing register applicants

Applicants on the Council's Housing register within the highest bandings waiting for larger accommodation.

3 bed	196
3 bed	120
5 bed	40
6 bed	10
7 bed	1
total	357

5.3 Housing need of BME Housing Register applicants

48.7% White British, White Irish and White (other) households on the Housing Register are waiting for a 4 or 5 bedroom property. 17.6% of households have not declared their ethnicity. However the main BME categories who are registered and waiting for 4 or 5 bedroom properties are Black British African at 12.5% and Black British Caribbean at 7.8%.

6. Establishing a baseline

In order to effectively tackle overcrowding and target resources appropriately, it is critical that the first priority must therefore be to put system in place to gain a true picture of the levels of overcrowding. Work has therefore been commissioned to further develop the Housing IT system to enable detailed recording of levels of overcrowding and under occupation for all applicants. Once this has been developed a full re-registration exercise will take place to combine the register into one common housing register for Bromley and to gather this information from existing (and new) applicants.

Work will also be undertaken to encourage Households who are under occupying or living in overcrowded conditions to register in order to get a truer picture of the total levels within Bromley. The main focus will be on those households in the social rented sector.

Colleagues in Environmental Health often identify households living in overcrowded conditions and will continue to inform the Housing Division when this arises.

The Council have commissioned a Housing Market assessment, which will include a Housing Needs survey. The assessment will give indicative levels of overcrowding within the Borough and should be completed by the end year 2008.

Baseline Data held on the Council's Housing register on 31st March 2009.

Overcrowded Households:

Current Accommodation	
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1 bed	119
Of which severely overcrowded	27
2 bed	115
Of which severely overcrowded	43
3 bed	76
Of which severely overcrowded	25
4 bed	9
of which severely overcrowded	4
Total	319

Underoccupying households:

Current Accommodation	
2 bed	21
3 Bed	29
4 Bed	5
5 Bed	1
Total	56

7. What we currently do to tackle overcrowding:

- **Underoccupation scheme**

The aim of the scheme is to free up family sized accommodation. In 2007, the Council in partnership with Bromley Federation of Housing Associations establish an Under Occupation pilot to review the current scheme in order to gain a full list of all under occupiers and to better establish what incentives, support etc. should be established to increase the level of larger properties released by moving under occupiers to suitable accommodation. The scheme commenced actively moving under occupiers during the second half of the year and released 3, 4 bed properties by the end of the year. The scheme also released additional properties through assisting applicants to move to other areas and tenures.

- **SELHP Under Occupation scheme**

The scheme operates across 5 boroughs and 12 housing associations. Since its launch in August 2007 it has achieved 22 moves.

- **Broomleigh Housing Association 'New Generation' scheme**

The scheme aims to target overcrowded households, offering move on for adult children to relieve overcrowding and prevent homelessness. Broomleigh provide these lettings from their own allocation scheme.

- **Bedroom standards and flexibility**

The current Allocations Policy bedroom standards used for assessing bedroom entitlement for bed spaces is more generous than the minimum bedroom standard set out. Overcrowded applicants requiring larger sizes may opt to take a slightly smaller property (so long as this would not leave them severely overcrowded) to speed up the rehousing process and relieve the level of overcrowding. It is also anticipated that the standards help to relieve future levels of overcrowding reducing demand for transfer in the future. The Policy

also offers the flexibility to under occupy some units to allow for changes in family composition and avoid future levels of overcrowding or child density.

- **The Allocations Policy**

The policy reflects overcrowding with the reasonable preference priorities and seeks to ensure rehousing through reasonable preference categories, thus ensuring such families do not have to present as homeless.

- **Housing Associations**

Housing Associations consider options, in partnership with the council to carry out works to relieve overcrowding such as converting 2 homes into one larger home. The Council is supporting a bid by Broomleigh Housing Association to the Housing Corporation for funding to extend 4 properties, where households are currently overcrowded. Broomleigh aim to create

- **Our private sector incentive and rent deposit schemes**

The schemes are open to all highly banded or potentially homeless clients, including those experiencing severe levels of overcrowding. The schemes also give people the opportunity to move to a place of their choice outside of London.

- **Working with Planning**

Work has taken place to establish close joint working protocols with planning to ensure the delivery of at larger family sized accommodation for all new build developments, meeting as a minimum the Housing Corporation 35% target.

8. Implementing and monitoring the action plan

A multi-agency project board is to be established to oversee the fine-tuning, implementation and monitoring of this overcrowding strategy. Progress will also be reported to DMT, within the bi-annual performance reports to Members and through the Bromley Federation of Housing Association who have included the implementation of the overcrowding strategy as a key objective within their current work plan. The Federation will also be working with the Council to meet the objectives of this Strategy and to ensure identified actions are delivered.

9. Use of pilot funding

The grants provided will be used to assist in the development of the following areas: -

- development of IT system to deliver baseline and reporting information
- dedicated staffing resources to visit and deliver housing options interview for overcrowded households
- funding of small works/items to create more space/relieve the impact of overcrowding

Existing resources will support this work through:

- Management and staffing support to develop and implement the strategy
- Private sector incentives
- under-occupation scheme

In addition a key area of work will be to explore potential sources of funding to support and further develop this area of work including potential RSL and capital funding contributions.

10. Draft - Overcrowding Action Plan 2008 – 2010

	Action	Expected Outcome	Baseline date	Target	Update 2008/09:	Responsible officer
1	To develop the Anite Housing System to enable recording and reporting of overcrowding information	Improved data for levels of overcrowding to fulfil reporting requirements and enable targeted action	Current system does not fulfil reporting requirements and cannot provide information for all levels of overcrowding.	System development and operational by June 08	Completed	Head of Housing Needs
2	Combine Broomleigh Housing Association and LBB Housing Register and re-register all applicants to collect required data	Improved data for levels of overcrowding to fulfil reporting requirements and enable targeted action	Information currently not held and potential duplication between systems	Re-registration and common registered work to be completed by Sept 08 as part of CBL implementation	Completed	CBL project group
3.	To introduce automated housing register auto banding to facilitate roll out of the combine	Improved data for levels of overcrowding showing holistic picture across RSIs operating	RSIs currently hold own waiting lists RSIs tenants can also apply to go onto the	Auto banding to be operation by Q4 2009/10	Project commissioned and action plan in place to work towards implementation in Q4	Group Manager housing Solutions

	register to key RSLs	within the borough	Council's housing register. Information is therefore not consistent and may involve a level of duplication.			
4.	Roll out of common register to RSLs	Improved data for levels of overcrowding showing holistic picture across RSLs operating within the borough	RSLs currently hold own waiting lists RSLs tenants can also apply to go onto the Council's housing register. Information is therefore not consistent and may involve a level of duplication.	Roll out to commence Q4 09/10	Not yet due to commence	CBL project manager
3	To research and establish information held by other RSLs and also Environmental services	To gain a wider understanding of overcrowding levels and enable future prediction of trends	Some RSL tenants already registered on LBB HR, EHS liaise on case-by-case basis.	Work to be completed by Oct 08	Protocol established and operational to refer case to Housing Needs	Head of private sector team, Chair of BFHA

4	Establish multi-agency project board to oversee development, implementation and monitoring of Overcrowding strategy	Commitment gained from respective organisations to achieve reductions in overcrowding levels	No established leads or common approach to tackling overcrowding	Project board to be established by July 08 as sub-set of the Homelessness Forum	Implementation & monitoring mechanisms established through Housing & Residential Services Management Team & Bromley Federation, with no additional board now required.	Head of Housing Needs
5	To set targets for tackling overcrowding for various initiatives against baseline	Commitment gained from respective organisations to achieve reductions in overcrowding levels	No clear targets set, cases not monitored precisely against overcrowding levels	Produce targets and agree formal sign off through project boards and member approval in autumn cycle.	Annual Targets in place and agreed through the Portfolio Holder's annual business & performance plan.	Head of Housing Needs
6	Establish dedicated staffing resources for overcrowding	Central point of contact to undertake visiting, develop and implement options assessments to reduce levels of overcrowding against targets set.	No dedicated lead or procedures set up for visiting/options interviews especially for overcrowded households	In post by Sept 08	Officer in post.	Housing initiatives Manager
7	Undertake a review of the Allocations Policy to ensure it	Increased number of households moving to	System does have reasonable preference	All overcrowded households assisted via	Completed	Group manager Housing Provision

	provides the flexibility & priority required to support the overcrowding strategy	suitable accommodation, increased number of properties released through under occupation moves.	categories for overcrowding but not monitored specifically	reasonable preference and not homelessness route Policy review completed by July 08 Targets set within allocations plan to monitor move-on for overcrowding.		
8	Develop publicity, mailshot material and visiting schedule to undertake options interviews for most severely overcrowded households.	Increased take-up of options to reduce overcrowding levels	Numbers assisted through options scheme	See annual targets	Awareness raising and publicity materials in place including: Leaflets on schemes, advertising schedule within community papers, RSL magazines and attendance at various events including the older people's day, homelessness forum etc. Website updated to promote Underoccupation/overcrowded schemes and raise awareness of potential solutions.	Housing initiatives Manager
9	Establish options toolkit for small works, prs etc to	Increased take-up of options to reduce	Numbers assisted through	Toolkit to be developed by Oct 08	A basic toolkit approach has been established based upon the housing options process.	Group Manager Housing Solutions

	use at options interviews	overcrowding levels	options scheme 07/08		This needs to be formalised and combined into Destin solution during Q2 09/10. Formal procedure established & in place.	
10	Training for staff overcrowding targets, action plan and toolkit	Increased take-up of options to reduce overcrowding levels	Inconsistent awareness	TBC	Induction & training have been completed for the dedicated post, together with sessions at both the homelessness forum and Bromley federation of Housing Associations.	Housing initiatives Manager
11	Prevent overcrowding in temporary accommodation	Ensure all long term temporary accommodation placement are initially of a suitable size	Baseline to be established from current occupancy	No households placed into long term temporary accommodation which is overcrowded from onset unless in an emergency	On-going monitoring is in place to ensure no household is placed into severely overcrowded conditions.	Group Manager housing Options & Assessments
12	Commence work with BHA to reconfigure hostel provision	Reduce level of overcrowding in hostel accommodation, providing self contained units	Baseline to be established against current occupancy	No households to be overcrowded at time of placement unless in an emergency	Transfer to Broomleigh completed Jan 09. Refurbishment work has commenced and the project is now well underway & on track to complete against target timescales.	AD housing, BHA – Julie Schoon/Group Manager Housing Solutions & Options/Assessment
13	In liaison with planning continue to secure larger family sized units	Increase the supply of larger family sized accommodation	HC target achieved	To continue to achieve at least 35% in line with the HC target	40 units completed	Head of Development & Strategy

	on all s106 and new affordable housing schemes					
14	Agree protocol with Tower (local Homebuy agent for the prioritisation of overcrowded applicants or siblings sharing accommodation which is overcrowded	Reduce overcrowding through access to shared ownership for overcrowded families or adult children living sharing with families in overcrowded conditions	Data required form Tower if able to do so.	tbc	<<Update needed of timescales>>>	Head of Development & Strategy
15	Continue to promote the sons & daughters scheme	Reduce overcrowding by facilitating move0on for adult children sharing with family in overcrowded conditions		tbc	11 achieved. Procedure to be reviewed as part of auto banding implementation during Q3 09/10	BHA – Julie Schoon, Group Manager Options & Assessments
16	Release 3+ bedroom properties through the under occupation scheme and ring fence these	Increase the number of RSL properties available for overcrowded households	3 x 4+ bed released Q3&4 07/08 Baseline form SELH scheme	5 x 3+ properties released and targets at severely overcrowded households	19 properties released.	Group manager Housing provision

	properties for overcrowded social housing tenants. Including promotion of SELHP scheme					
17	Promote take up of private rented sector accommodation to relieve overcrowding through use of rental deposits/incentive schemes	Increase the number of overcrowded households moving to suitable accommodation	Baseline 07/08 figures	10	13 households assisted	Housing Initiatives Manager
18	Explore options for funding resources including potential RSL contributions	Increase resources to reduce overcrowding levels – more households assisted into suitable accommodation works undertaken to create more space	No current funding available	Scheduled to commence Q3 2009/10	2 referrals have currently been made within architect plans and costing for larger works. These are being used to assess potential for funding	Assistant director Housing & Residential Services
19	To seek to acquire larger	Increase the number of	New scheme previously		6 x 3 bed properties acquired during 2008/09.	BHA/Town & Country/Ad Housing

	family sized units through temp to settled scheme	overcrowded households moving to suitable accommodation	targeted at homeless households and smaller units		Funding for phase 2 successful and work underway to identify provider	
20	To seek to promote specific properties for overcrowded households through CBL	Increase the number of overcrowded households moving to suitable accommodation	CBL not operational	Launch Sept 08. Target to be set within allocations plan	2009/10 Allocations plan includes targets for overcrowding & Underoccupation	CBL project Board
21	To explore potential to promote chain moves through CBL	Increase the number of overcrowded households moving to suitable accommodation	CBL not operational	Launch Sept 08. Target to be set within allocations plan	Work to commence Q3 2009/10	Group Manager Housing Solutions/CBL user group.

Completed/achieved	
Work underway & on track	
Work not yet due to start	
Behind schedule/not achieved	

Performance Targets 2009/10:

	2008/9 Target	2008/09 Actual	2009/10 Target
Number of RSL under occupiers moved to free up larger family sized	23	19	25

accommodation			
Number of overcrowded households moved via Housing Register	100	130 assisted form social rented housing, plus an additional 42 from the private sector who would otherwise have been accepted as homeless due to the level of overcrowding.*	200
Overcrowded by 1 bedroom			
Overcrowded by 2 bed rooms	15		25
Number of overcrowded families assisted to access private rented sector accommodation either	10	13	15
Number of households assisted through sons & daughters scheme to alleviate overcrowding	15	11	20
Number of overcrowded households assisted with options to alleviate the impact of overcrowding	2	2	16
Number of overcrowded households assisted with works to resolve the level of overcrowding	2	2 referred	5

* this data covers the period following the IT upgrade

Overcrowding Review

I am writing in reply to Andrew Buff's letter of 21st July asking for our views on four main points and some supplementary questions. We believe we can write with some authority on this issue as we are a social landlord with overcrowded residents and a developer of 800 homes pa with over 40% of the rented homes being 3-bed plus. We have also been grappling with solutions to this at a local level for some time.

1. Increasing the supply of larger family homes will only effectively tackle the overcrowding problem if the allocation of homes by local authorities also changes. Every new home/letting is an opportunity but Councils refer to us families straight out of Temporary Housing and fail to create chains of lettings. A four bed house is an opportunity to help three or four families but this is rarely taken. Chain lettings are hard work and time consuming but worth the effort. Greater intelligence is needed in the allocations process.
2. The obstacles to us providing more large homes are:
 - (i) The right land. Large homes are not always appropriate on high density schemes and on schemes without car parking.
 - (ii) Planning Policies. If we want to put a 4-bed home on a site' and a private developer wants to put a couple of flats because his/her option generates a greater land value, we are bidding for the land at a disadvantage. We need a level playing field on a site by site basis so that private and public minded developers have the same planning brief.
 - (iii) Building Standards. HAs and Local Authority developers have to achieve higher build standards than the private sector which makes us less competitive when bidding for land.
 - (iv) Rent Policies. The social rents on larger homes are not much more than smaller homes and so they are less financially viable. The rent differential needs to change to reflect better the differences in value/cost.
 - (v) Grants. The grants are also not much greater and so large homes become less viable.
 - (vi) Policies. There are supposed to be sub-regional lettings policies but these do not work well. Boroughs do what they can to avoid them and I can understand why as housing needs differ between boroughs. Overcrowding is worse in inner London and much of the land suitable for larger homes is in the suburbs. The Mayor needs to get all the boroughs to help solve London's problems and not just their own.
3. We are already meeting the Mayor's proposed target of 42% and we are building an exciting scheme at Silk Gardens in Tower Hamlets where we are delivering 3, 4 & 5 bed homes for shared ownership. However, I caution against targets applying just to social housing as this makes us uncompetitive when trying to buy land. We also think that a moratorium on small homes does not make sense as they are often the right product for a site and there also remains a demand for smaller homes.

4. The impact of building more large homes would be a small reduction in the problem. If we want to achieve a bigger impact than then the policy must be combined with changes to the Allocation Policies for letting the homes.

Supplementary Questions

Many of the points below have been made already and so I have kept my answers brief.

The Economics of this issue are: Land cost, grant levels, planning policies, planning taxes (Section 106s), planning processes (time) and rent levels are the main issues. Planning policies and grant levels having the greatest affect.

Budget reductions: These will reduce supply in proportion to the cuts unless public land is used to supplement the grant. Historically, we have also been able to cross-subsidise social housing from sales but this is difficult in the present environment.

Contribution of Mayor's Plans: He could create a level playing field on standards for both social housing and private developers now and not in 2016.

Other Options: Change the Allocation policies of homes by the Boroughs and charge higher rents on existing homes to generate greater development capacity.

Grant Rates: The Government has always been driven by units and not people housed. Grants need to be biased towards meeting housing need not units. If grants were given per person housed we would deliver even more homes.

Other Levers: Rents for larger homes need to increase to reflect the net cost differential.

Market Contribution: Planning policy needs to be more assertive on this at a strategic and site brief level.

If you need any clarification please let me know

regards

**Rapporteur into overcrowding in London's social housing, Planning and
Housing Committee OSRH003
Meeting with June Barnes, East Thames Group
2 August 2010 at 3pm in Andrew Boff's Office**

Present

Andrew Boff AM, Rapporteur, Planning and Housing Committee
June Barnes, Chief Executive, East Thames Group
Sarah Hurcombe, Assistant Scrutiny Manager, GLA
Dana Gavin, Communications Manager, GLA

1. Discussion on overcrowding in London's social housing

- 1.1 June Barnes believes that building a greater number of family sized housing is only "part of a patch-work" in tackling overcrowding in social rented accommodation. Overcrowding in London is a more complex issue and other factors need to be taken into account. These include:
- Borough/sub region and regional allocation policies which are largely set as a result of current statute and government priorities;
 - The mix and location of family sized housing in a development;
 - Housing density;
 - Lack of mobility in social housing;
 - Management of housing developments;
 - Shortage in supply. There has been a loss of homes as a result of not replacing the social housing lost through the right-to-buy scheme.

Borough allocation policies

- 1.2 June believes that building larger family sized homes without also looking at how new homes are allocated will not be enough to address overcrowding. Houses are allocated in a number of ways by local authorities. More points are usually awarded to those who are homeless/ in temporary accommodation rather than those living in overcrowded conditions as a result of statute and government policy. This can exacerbate overcrowding levels. Re-housing existing tenants who are overcrowded will still result in vacant homes and therefore not result in any loss of social housing stock available to let.
- 1.3 June would not abandon the tenancy-for-life policy but does believe there is scope to have a conversation with those who are under occupying. Unless LAs have an under occupation policy most social tenants don't downsize. Housing associations and LAs need to incentivise downsizing, for example by offering tenants:
- 1.3.1 Newly built smaller homes at a stage during the development process which would allow them to choose which unit they would like.
 - 1.3.2 Giving them an extra bedroom so for instance if a couple or a single person were moving out of a three bedroom house they can have a two bedroom flat

- 1.3.3 Providing financial incentives and help with moving.
- 1.4 June believes the Mayor could influence how LAs manage their stock and could encourage allocation policies that give more priority to rehousing existing overcrowded households through his housing strategy.
- 1.5 The ideal tenants for one or two bedroom homes are those who are downsizing e.g. those whose children have left home, rather than young families who may increase in size.
- 1.6 June highlighted a recent report of the Mobility Taskforce, led by David Orr, National Housing Federation, which recently reported to Grant Shapps, Minister for Housing:
<http://www.housing.org.uk/Uploads/File/Policy%20briefings/Neighbourhoods/Mobility%20Taskforce%20report%20August2010.pdf>

Post interview comment

We would add that we think that it is worth extending the Seaside and Country Home Scheme/retirement schemes as other ways of promoting opportunities for older people to move. We would warn that initial reading of the proposed changes to Housing Benefit rules potentially mean that older tenants who move to to home with a spare room may not be eligible for full cost of rent although their benefit will be protected if they stay in their existing home – therefore it is likely to be safer to stay in their 4 bed house than to move to a two bed home!!

Housing density

- 1.7 June believes that the ideal model for family sized housing is low-rise houses, or ground floor flats/maisonettes with gardens. High density family sized housing can have unintended consequences and can make schemes more difficult to manage in the longer term. This is due to:
- Higher service charges;
 - Increased complaints from other tenants due to the number of children using communal spaces and shared facilities such as lifts; and

Post interview comment

Increased wear and tear on shared facilities. This can be avoided in higher density schemes by making use of Lettings Plans which manage child density -with bedspace under-occupation and ensuring a mix of child ages in the scheme at first let?

- 1.8 In recent years there has been a push towards higher density housing in London, particularly around transport hubs. This has been encouraged by:
- The planning system allowing it. High density housing is in line with the London Plan;

- The Planning Inspectorate (DCLG) setting an acceptable density level which supported high density schemes;
 - Developers being willing to propose higher density housing due to the increased profit they can make from such developments; and
 - The buy-to-let market booming in this area with a significant number of units bought off-plan, particularly one and two bedroom flat which were attractive to let.
- 1.9 June believes there could be a ceiling on density rather than the current system of having a density floor to allow more flexibility within new schemes.
- 1.10 A recent report commissioned by East Thames looking at high density housing and its impact on tenants is available online at: http://www.east-thames.co.uk/assets_cm/files/pdf/ReportServiceCharges.pdf
- 1.11 A high density tool kit is available online here: http://www.east-thames.co.uk/highdensity/1_neighbourhood_amenity_and_location.asp

Management of developments

- 1.12 Developments with high levels of buy-to-let have not worked out as expected. There are a large number of different landlords who don't live on site and who don't have a personal investment in taking care of the development on a day to day basis.
- 1.13 New housing developments require a mix of house sizes to give them a balance of household types. Putting all family sized housing in one location results in a large number of children, which puts undue pressure on shared amenities and can lead to problems with anti-social behaviour.
- 1.14 June suggested her ideal mix for the family housing element of a new development would be 50 percent three beds, 25 percent four beds and maybe a few five or six beds depending on local circumstances. However, depending on the size of the development, this would need to be balanced with a mixture of smaller units to ensure overall child density wasn't too high as well as a range of tenures.

Other possible solutions

- 1.15 In addition to the issues discussed above, June felt the following measures could address overcrowding in London:
- Loft conversions and extensions;
 - De-conversions, although this would require funding; and
 - New models of ownership, such as fixed equity housing as where people cannot buy out the full equity in a scheme as alternative to shared ownership as this inevitably ends up back on the private market at some point when people have 'stair cased out'.

Obstacles to increasing the supply

1.16 The obstacles to increasing the supply of larger family homes include:

- Finding the land for more family sized housing.
- High land values/shortage of available land. Despite the economic downturn and a drop in land values in London, developers have been able to continue to sell off-plan and land is still difficult to source for new developments. Development land is still being held by owners expecting the market to improve.
- Rent accrued on a five bedroom house, in comparison to a one bed house, does not reflect the additional costs spent on the large sized housing. [National Housing Federation has done work on this- not available on website]

OSRH004

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25 August 2010

Dear Ms Hurcombe

Consultation on Overcrowding in London

Affinity Sutton Group is one of the largest independent providers of affordable housing in England. We comprise five Registered Social Landlords - Broomleigh, Downland, William Sutton Homes, specialist BME association, Aashyana, and BHT - a property management company called Grange and a specialist buildings maintenance provider, Community Building Services.

We work in over 120 local authorities including 16 London Boroughs, in which we have over 17,000 of the 55,000 properties we own and manage. These include General Needs, Supported Housing, Keyworker and Leasehold and Part Buy/Part Rent Properties.

We have an active new homes development programme and in the last two years have completed over 700 homes in the Capital.

We welcome the opportunity to contribute to the debate on how to tackle Overcrowding in London:

1. What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

Increasing the supply of larger family homes will tackle the housing problems of Londoners in overcrowded households only if Local Authority allocations policies significantly increase the priority afforded to overcrowded families wishing to transfer. When allocations policies ensure that all new and newly void family homes go to those previously living in the most severely overcrowded conditions, building larger properties will have an impact on overcrowding in the capital.

CBL systems need to be adapted to enable chain moves whereby larger homes are taken on by overcrowded households before the newly-released properties are advertised and made available to those in housing need. The Ahmad Case confirmed that Local Authorities are within their rights to do this:

“Newham are also delighted to rehouse any secure tenant who is willing to move from accommodation which is now too large, most of whom will not fall within any of the reasonable preference groups...No-one suggests that these are unlawful.” Pt.14 Judgments - R (on the application of Ahmad) (Respondent) v Mayor and Burgesses of London Borough of Newham (Appellants)

Some Local Authorities are already doing this and where we retain the ability to do some direct lettings outside of nomination or choice based lettings agreements, we try to re-house our residents who are in overcrowded properties. We also actively match those on our transfer list who wish to downsize with those who are overcrowded.

2. What are the obstacles to increasing the supply of larger family homes?

The main issues affecting the supply of larger family homes are land values and expectation of land values - in short, fewer homes would be provided if more 3 + bedroom homes are included in a development and this will not generate as high a value as owners and developers expect. Developers have tended towards provision of smaller homes to make it work financially for them.

Lack of availability of land and viable opportunities

When developing new homes we must continue to provide and combine a mix of housing types and size and also tenure. The current planning system allows Local Authorities to require mixed tenure provision and we liaise with the Local Authority regarding the mix of property sizes. Facilitated by increased funding from 2008 we have been building projects with more larger family homes.

Good design is critical for all homes but in particular for larger homes in high density areas, where internal space and local amenities are at a premium.

3. The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor’s action plan to reduce social housing**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

Increasing the supply of family-sized homes –

As stated above, this will reduce overcrowding provided allocations policies make the best use of new homes. Back-filling the voids created by the vacating overcrowded household with those in greatest housing need at the top of the waiting list will inevitably have an impact on void times but ultimately result in better use of stock.

Setting a higher target for new family homes –

While we support this concept, housing associations will find this a challenging target. Most existing planning consents will not have prioritised family size homes and the associated land value will therefore reflect smaller units, often flats, at higher densities. It will be difficult to compete for land if private developers are not also required to provide 42% family dwellings.

Temporary moratorium on the building of small homes - We suspect that developers will hold back some development if any moratorium is temporary, or will push for financial incentives to include more larger homes.

Providing opportunities for under-occupiers who wish to downsize –

Provided the homes released are ring-fenced in the first instance for allocation to overcrowded families, any opportunity for tenants to downsize will help to tackle overcrowding. Priority should be given to those wishing to downsize but should allow one extra bedroom above needs.

Full use should be made of schemes such as Seaside & Country Homes, the whole range of mutual exchange services and Choice Based Mobility which all contribute to making better use of existing stock. Financial support should be available to cover costs for those downsizing and in particular to cover 'hand holding' costs (often the most important element) to persuade older under-occupying residents to downsize.

Furthermore, if boroughs ensure that their smaller properties are desirable they could use the Seaside & Country Homes model (offering two-bed properties to singles and couples under-occupying giving priority based on the number of bedrooms being released) to reduce overcrowding. If 10% of under-occupying social tenants in London took up this opportunity 6,400 larger properties could be released to house overcrowded families this year.

Under-occupiers in family sized homes tend to be those whose children have grown up and moved out. Better use of the over-supply nationwide of retirement accommodation could be made by relaxing restrictions to allow under-occupiers aged say, over 55, to move in thus freeing up their family sized homes for overcrowded families.

Providing alternative options for overcrowded households and making best use of allocation schemes to meet needs –

Financial support to carry out extensions, internal remodelling and loft conversions on properties where this is possible (preferable to uprooting overcrowded families) and for the purchase of space-saving furniture would help in many cases.

Capital grants to enable smaller, less popular units to be converted into bigger units, for example, adjacent flats knocked-through.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

Building a greater number of larger family homes would help secure a chain of moves, releasing smaller existing social housing for new households. However, it is important that we do not return to building estates with very high child densities that may create the sort of problems identified by David Page in "Building for Communities". We also should not forget the importance of building smaller properties to encourage under occupiers to move: Some new builds should be targeted at the client group who generally under-occupy (ie older people), so that there is an attractive offer to encourage a move. Smaller accommodation could also be used to house young adults in overcrowded households, independently but in close proximity to the main family unit.

In summary, we believe that a higher proportion of family homes being built will help to address the problem of overcrowding in London provided that allocations policies are consistent and make the best use of both new and existing stock. We believe that attention should not be diverted from initiatives which are already helping under-occupying tenants to downsize and that assist overcrowded families to extend their homes and better use the space they have.

We hope that you find these comments of use in developing your approach.

Yours faithfully,

Planning and Housing Committee: Overcrowding in London Response to review -OSRH005

What are the obstacles to increasing the supply of larger family homes?

Affordable Housing Targets

- The overall national target regime is primarily concerned with the number of homes and on this basis the most significant affordable housing target for all public bodies is the number of completed homes. This target filters down to Local Authorities and the HCA and through the HCA to Registered Providers, who are currently only certain of ongoing qualification for affordable housing assistance if they achieve their HCA targets. Unless a larger family homes target is of equal significance, the industry will most often seek to provide smaller homes.
- Affordable housing that is delivered through S106 schemes has tended to be market driven and delivered one and two bedroom homes.
- The time lag in introducing policies and implementation through the planning and development process leads to a delay. The HCA and its predecessor organisations through its 2008/11 prospectus is only now seeing the result of the policy change to deliver 42% family homes coming to fruition, which can be seen in set out in appendix 1.

Cost/viability

- Benchmarks for Affordable Housing Assistance are based on a per unit rate. Registered Providers do not currently receive substantially more grant to build a larger home and thus the system encourages them to build smaller homes which are cheaper to build. Other indicators, such as a per person rate are used by the HCA, but CLG targets mean that the per unit rate is the primary benchmark. Placing more emphasis on the per person rate benchmark and perhaps adopting this as the primary benchmark, may encourage deliverability of more family homes. This does need to be managed to ensure that the homes are practical and provide places where people want to live.
- The housing densities required to recoup high land costs in London favour the development of small units. For new affordable rented housing to be viable, it is usually necessary to build some private for sale or intermediate flats on the site with values generated 'cross subsidising' affordable units. This typically necessitates a flatted development, particularly on smaller sites delivering small numbers of practical family housing at ground and first floor level in the form of maisonettes or large flats within the blocks. It is only in larger developments that a mix of

houses and flats can be developed, and these tend to be more complex and therefore slower in delivery.

- There is low demand amongst Registered Providers to manage family-sized units situated at high levels within flatted blocks. Tenants do not want this type of accommodation and housing management is more difficult. Consequently, Providers are less likely to build this type of development and less likely to purchase affordable units of this type from a Developer.
- The rent received by affordable housing providers building new larger units does not offset the increased cost of building a larger family unit: In terms of balancing income against expenditure, it is more cost-effective for Registered Providers to build smaller units.
- The service charge for larger homes, in addition to the rent can mean the home is unaffordable for social housing tenants. This is a particular issue relating to intermediate homes when there is a mortgage, rent and service charge to pay.
- Changes to the Housing Benefit (Local Housing Allowance) calculation will increase demand for permanent larger affordable housing. The Local Housing Allowance will reduce from 50% of local rent in a given area to 30% and a rent cap will be established. Rents for tenants in temporary housing will become unaffordable and consequently, Local Authorities will be under pressure to re-house tenants (who are often families, requiring larger homes) into permanent social housing. There will be an increase in demand for larger affordable homes above and beyond current demand.

Planning policy

- Planning Policy is not always sufficiently robust. Many of London's Local Authorities recognise that larger family homes for affordable rent represent the largest housing need within their area, however, this need is not always articulated within local planning policy and therefore developers receive planning permission for schemes without a significant proportion of larger family homes. The need to ensure that Local Authorities local plans generally conform to the London Plan and the Mayors Housing Strategy is therefore important.
- S106 agreements sometimes stipulate the affordable housing required on a site as a percentage of the total number of units on this site, e.g. 50% of the units of the units should be affordable. This does not impose any obligation on the part of the Developer to build larger affordable homes. A more robust S106 agreement would stipulate the affordable housing as a percentage of the habitable rooms on the site, and being clear about typologies thereby guaranteeing the provision of larger affordable homes.

- The PTAL ratings in the London Plan encourage development at maximum density. Higher density in London tends to encourage certain typologies and in turn favours the development of smaller units.
- Should the GLA affordable housing toolkit assessment reveal that the scheme is not viable, in these circumstances Local Authorities can agree to forgo larger family homes in the interests of scheme viability and of gaining some (often smaller) affordable homes.
- Incentivising larger homes on every site may appear to contradict the Sustainable Communities agenda, which argues for sustainable, diverse communities within each development, consisting of dwellings of a number of tenures and sizes.
- A greater number of larger family homes would mean an increase in child density, increasing the need for social infrastructure tailored for families, which is likely to increase S106 costs and therefore impact on scheme viability.

The Mayor has plans to tackle over crowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce overcrowding**

HCA London considers that to have a target for larger homes is important. The fact that a target was included in the 2008/11 prospectus made it clear to providers that a significant number of family homes needed to be delivered and has allowed the HCA to be more robust in prioritising the funding of the schemes which deliver family housing. In addition the HCA London is promoting a number of the schemes set out in the Mayor's Action Plan for Overcrowding as set out below.

Homes Out of London

- HCA London is managing a small programme referred to in the Mayor's Action Plan: Overcrowding in Social Housing. Homes out of London is one of a number of programmes with the ambition to move under-occupiers into smaller properties and thereby free up larger family homes. The programme kicked off in December 2009 and a review is planned once the programme concludes in March 2011. Early programme achievements (as stated in the Mayor's Action Plan) have been the acquisition of a number of homes in Kent and the relocation of economically active under-occupiers from the South East sub region. The other London sub regions are making progress with their programmes and have identified Registered Providers with which to work.

- Nonetheless, the ambition to promote this scheme with local grant rates (i.e. within the Region of the acquisition and generally at lower levels than London) has not proved possible. Properties attractive to under occupiers have tended to be in the more expensive locations outside of London or types of properties that are also scarce in the location and therefore expensive. In general, properties can be identified which require HCA funding at the lower end of the London grant benchmarks for affordable rent. Other anecdotal evidence suggests that the small number of 4 bed+ homes in London stock means it is likely to be 3 bed properties that are vacated. At this early stage of the programme it has not been possible to ascertain if a chain of moves is initiated through this process and therefore a cost benefit analysis has not been done. However a programme like this working alongside other initiatives to support relocating under occupiers can be seen as a very useful tool to address London's overcrowding problem

The Role of Intermediate Housing

- There is demonstrable need for family sized intermediate homes in London. The GLA Strategic Housing Market Assessment showed that 86% of intermediate need is for 3 bed+ homes. Last year 8% of intermediate purchases in London were 3 bed+ homes, compared with 26% nationally and a GLA target of 16% by 2011.
- A commonly held view is that family homes are not delivered because government policy is focused on first time buyers, costs are prohibitive and targeting/marketing is ineffective. As a result it is not possible to deliver a home that is accessible to priority households and which represents good value to the public purse. HCA London with the support of the GLA and LDA intend to set up a demonstration project to deliver approximately 200 family sized Intermediate homes. It is anticipated that if we build more 3 bed+ intermediate homes that are accessible to priority households and market them more effectively to a better targeted household group, we will respond to genuine need and meet pent up demand. At the same time, this can tackle overcrowding and reduce waiting lists at a lower cost to the public purse. These products could target overcrowded households in both rented and intermediate homes and create a 'second time buyer' offer for shared owners in need of a larger home. This scheme has been approved by the HCA London Board.

The Role of the Private Rented Sector

- In terms of diversifying housing options there is a role that an expanded private rental sector could play in the housing market as it emerges from the economic downturn. Private rental property currently represents 14% of the total housing market (3m homes). Around 40% of these are likely to have been created by the buy-to-let mortgage market between 1998 and 2007. 75% of landlords are individuals, most holding less than five properties. The Rugg Review for the Government in 2008

highlighted serious concerns about the quality and letting practices of a minor but significant proportion of landlords in the sector. Compared with many European countries, very few private rental households in this country are living in professionally managed homes owned by large scale landlords. Choice for the consumer is likely to be an increasing issue as demand for rental property grows.

- The HCA's private rental sector initiative is part of the Agency's strategy to introduce new private investment and create greater choice for consumers in the housing market, reflecting the strong support for such an approach in the Mayor's Housing Strategy. Institutionally-led investment in the private rental housing market has the potential to meet the demand for new housing supply, traditionally focussed on owner-occupation, which is currently depressed due to the difficult market conditions. The establishment of the private rented sector, however, will be significant in varying the type and quality of products in the sector. A balanced approach of incentives and measures in the housing market is needed and the Private Rental Sector should be considered in the context of a wider view of the housing market.

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

- London's diverse communities have diverse housing needs so to introduce a moratorium on the building of smaller homes could impact adversely on particular groups of society for example on the housing needs of the elderly and others who require supported housing. Without providing good quality smaller homes, initiatives to deal with under occupation would also stall.
- In general terms there needs to be a link between investment in new build affordable housing to the release of under occupied homes and working with those people in social rented housing who aspire to move into intermediate housing products.

What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

- The construction of a greater number of larger homes built on the same sites, within planning density limits, would mean fewer total homes and fewer households housed.
- The housing needs of other groups would not be met, such as single, homeless young people, couples and people in need of supported housing which tends to be one or two bedroom homes.
- Providing a greater number of larger homes would have a positive impact on over-crowding, freeing up smaller homes for others in housing need.

Appendix 1

National Affordable Housing Programme analysis of larger homes provision

Introduction

This analysis has been carried out in response to the GLA Planning and Housing Committee undertaking a review of overcrowding levels in London's social rented housing.

Background

The Mayor's Housing Strategy sets out targets for allocating NAHP funding to larger homes. The target is based on allocations of grant made from the NAHP 2008-11 programme during 2008 to 2011 and set out that 42% of allocations for rent should be made to fund larger homes (3+ bedrooms). For intermediate market, the target is to deliver a step change and allocate 8% to larger homes by the end of the first year (2008-09 programme period), increasing to 12% allocations by the end of (2009-10 programme period) and a further increase to 16% by the end of the (2010-11 programme period).

Analysis

The table below shows the completion profile of allocations made since 2008 and the proportion of those homes that have 3 or more bedrooms.

From this analysis it can be seen that larger homes completions in 2009-10 met the target of 42% for rent. It should be noted that the table shows **current commitments** only and based on those commitments in 2010-11 the proportion falls to 38% and increases to 39% in 2011-12. The HCA London team will continue to allocate to new schemes, which will in turn, continue to contribute towards the overall larger homes allocation targets. These figures do not include allocations made from the previous programme (prior to 2008) where the allocation target did not apply.

Allocations by number of homes by completion year	2008-09		2009-10		2010-11		2011-12	
	Rent	Int	Rent	Int	Rent	Int	Rent	Int
No. of the above that are 08/11 allocations	2,098	472	3,694	2,462	6,704	3,291	8,843	3,715
No. of larger homes (3 bedroom and above)	649	18	1,535	121	2,550	247	3,406	415
% of comps from 08/11 allocations that were to larger homes	31%	4%	42%	5%	38%	8%	39%	11%

Source: HCA Investment Management System data as at 31st July 2010.

HCA London Programme and Information Team
August 2010

Dear Michael,

I am writing in response to Andrew Boff's letter dated 21/7/10.

The following comments are from my own perspective as sub regional housing co-ordinator. Due to time constraints and holidays I have not consulted the boroughs I represent about them - so please note that in theory there's a possibility they may not entirely reflect each boroughs' view.

1. Increasing the supply of larger family homes would without doubt make a significant contribution to tackling the housing needs of overcrowded Londoners. However it does not follow that every larger family home provided will be let to a household that is currently overcrowded. Increasing supply does not therefore necessarily always have a direct or immediate impact on overcrowding.

2. The obstacles to increasing the supply of larger family homes are broadly within 2 categories - planning and economic. Without very clear and robust requirements to develop larger family homes through the planning system it is unlikely that they would be built - with the possible exception of executive type houses in particular leafy suburban locations. For the provision of affordable larger family homes the level of public subsidy (usually in the form of grant) and rent needs to be sufficiently attractive (i.e. high) for housing associations to develop them. For all developers, whether for profit or not, the development of high density 1 and 2 bedroomed flatted developments is nearly always a better financial proposition.

3. The Mayor's action plan to reduce overcrowding in social housing includes a number of measures that if fully implemented would be more effective than for example a moratorium on smaller homes.

The various measures in the Mayor's Action Plan may merit comparison to provision of more larger family homes both in terms of effectiveness and value for money.

Provision of extensions to the homes of tenants that are currently overcrowded may in the long term be the most effective approach of all - but we have a long way to go before it is systematically pursued as an option and the future of funding programmes to both RSLs and boroughs through the Targeted Funding Stream is in doubt. Our sub regional programme has been successful because we now have some momentum - it is very easy to lose this and the effective delivery that goes with it when future funding is uncertain or stops and starts.

Freeing up existing family homes by offering alternative housing to under occupiers, and providing the necessary assistance and support, also appears to be effective. Our Perfect Fit scheme frees up family sized RSL homes at a total cost of just over £2,000 per unit. We aim to do at least 25 moves per annum through this scheme, however in early 2010-11 we were not on course to achieve this since the supply of suitable 1 but usually 2 bedroomed properties had not, at that point at least, been forthcoming.

Development of smaller homes that are attractive and suitable to under occupiers may therefore sometimes be a cost effective alternative to the construction of family sized homes. Our involvement in the Out of London scheme is a further way of testing this sort of proposition. Grant of just over £100,000 to purchase homes in Folkestone is being used to free up family sized homes in London. This does represent good value for money compared to new build of family sized homes in London but it is too early to predict exactly how good the value for money that will be achieved since it requires review of the balance of 3 bedroomed v. 4 bedroomed properties over an entire programme to establish (we contend that freeing up a 4 bedroomed home represents extremely good value for money, freeing up a 3 bedroomed home less so).

For under occupation programmes to be effective there needs to be a twin funding stream - one for supply of new homes the other for the hand holding type assistance (Perfect Fit type schemes).

The case for funding homes targeting under occupiers will be strengthened if government proposals for restricting Housing Benefit for tenants below retirement age are implemented.

Low Cost Home Ownership also has the potential to make a cost effective contribution. We welcome the HCA's Family Sized Intermediate Homes project whereby there is the prospect of increasing the public subsidy into intermediate family sized homes to ensure they are affordable to existing overcrowded tenants and tenants that currently occupy larger rented homes. £100,000 grant spent on an intermediate home may be money well spent if it frees up a larger social rented home. Our Strategic Housing Market Assessment indicates the presence of relevant households with incomes c. £35,000 for whom on the whole affordable products are not available - however we cannot yet confirm whether these households will move should the products be available, it seems sensible to test this out at the earliest opportunity.

We are in contact with CLG and HCA about relaxation of rules restricting the use of Local Authority 'Tenant Incentive Schemes' with New Build HomeBuy NBHB. The combination of Tenant Incentive Scheme and Social Housing Grant for NBHB, a so called "double subsidy", is still cost effective compared to building a replacement social rented home. As with Family Sized Intermediate Homes I believe that better targeting and calibrating of public subsidy into intermediate housing would make a significant contribution to tackling overcrowding.

Open Market HomeBuy has the capacity to make a contribution to tackling overcrowding - however once the scheme had been broadened in 2008 to "first time buyers" it failed to do so. Reintroduction of a limited programme that was confined entirely to freeing up social rented homes of a certain size would be cost effective.

There are 2 other inter related strands we have been pursuing:

- i) (RSLs) buying out under occupying leaseholders
- ii) a more comprehensive review of provision of housing for older people

It has been argued that under occupation schemes are more cost effective if they move relatively younger people - hence some interest in presenting housing options for people in their 50s, not just people at retirement age.

4. In the affordable sector the provision of more larger homes is usually effective in meeting a range of housing needs since overcrowded households moving into larger homes free up homes for smaller households in need. In theory then it would be possible to build only 4 or 5 bedroomed homes and be aware that ultimately the complete range of housing needs might be satisfied. Our Strategic Housing Market Assessment has highlighted this. In practice of course any greater proportion of larger homes being required does mean a reduction in the overall supply of new homes.

Supplementary questions:

- see above about variable grant rates for intermediate housing. The notion of higher grant rates being connected to certain outcomes i.e. freeing up social rented homes merits further investigation in my view. For intermediate housing as a whole in SE London the take up by existing social tenants is now as low as 5%, despite our efforts to target this group.
- planning policies that discourage conversions of existing properties - and adequate enforcement - would make a contribution.
- For the private sector provision of larger homes, especially flats, does not necessarily cater for families. It frequently results in under occupation or, increasingly, in HMO type arrangements.

Please don't hesitate to contact me if you have any queries or would like me to provide further detail.

yours sincerely,

I am writing in response to Mr Boff's request for assistance with a review being undertaken into overcrowding levels in London's social rented housing. This is an issue about which Hexagon is acutely aware of and committed to addressing through its development programme.

Our response to your four specific questions is as follows:

1) What are your views on the proposition that "increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding"?

Hexagon agrees that by providing more family sized homes (i.e. 3bed+) would significantly help to alleviate overcrowding in London. By providing family sized homes for residents living in overcrowded social rented homes, there is a knock-on effect of providing a home for a smaller family or couple in housing need to consequently occupy. Hexagon have over 210 households on its transfer list, awaiting a 3bed or bigger home and we are only able to meet a very small number of these requests each year, due to the lack of supply.

The housing problems in London are varied and complex, but increasing the *overall supply* of housing would help to address a major element of the housing crisis we currently face.

2) What are the obstacles to increasing the supply of larger homes?

The fundamental obstacle is the cost, and consequently the level of public subsidy that is required to deliver larger family homes. In its current 2008/11 funding NAHP programme, Hexagon has secured funding for schemes that have/will deliver 40% of family sized homes. This has been challenging and only possible due to the slowdown in the market, and deals we have been able to strike with small private developers wanting to urgently dispose of sites in the cheaper areas of London.

The problem for us is that the HCA primarily assess grant in value for money terms against the amount of grant required on a per unit basis, which fundamentally works against the provision of large family homes. This is illustrated by the following example; we have a development in Bexley known as Lower Road. It will provide 24 family sized houses with gardens, however, the grant required to deliver this project is considered too high, as on a per unit basis and it does not meet the HCA's VFM 'target'. However, if more importance was given to the grant per person grant levels as a measure of VFM (for family sized homes), the scheme would be more likely to secure the level of grant required. As a result of this situation, it is possible that the developer may instead choose to build-out the consented 51 unit 1 and 2 bed flatted scheme on the site if grant is not allocated at the levels required.

In terms of delivering affordable housing via S.106 agreements, unless the planning authority requires the delivery of a certain %age of family homes, a developer is inclined to provide smaller homes as they are cheaper and his profit margins will be greater. With the recent slowdown in developer led schemes, the number of family sized homes being delivered via S.106 is likely to take even longer to significantly add to the number of new homes required.

3) The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target of 42% of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce overcrowding in social housing**

How effective are these measures likely to be compared with other potential initiatives such as introducing a temporary moratorium on the building of small homes?

From Hexagon's perspective the target for family sized homes delivered through the NAHP was an initiative that we welcomed and we responded positively to this as outlined above. This target also made it easier to negotiate with developers in terms of what would be required to improve the prospects of securing funding. The HCA's latest London investment statement (Q4 2009-10) shows that across the 2008-11 programme 40% larger family homes have been 'delivered'. However, there is a gap in the delivery of intermediate family sized housing.

Having reviewed the Mayor's action plan, whilst the various initiatives and schemes around overcrowding and under-occupation are delivering some results (ref. the case studies), in reality the numbers of homes being provided through these schemes are very small, and therefore they cannot be relied upon to help the thousands of families in need of larger homes. We feel that this can only be effectively tackled through increasing the supply of new affordable social rented homes through grant funding.

We feel that introducing any kind of moratorium on the building of small homes could actually be counter-productive, in that it could deter developers (including some RSLs) from building any new homes as the financial viability of many sites could be threatened. Hexagon would therefore not support this approach as presented.

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's Housing needs?

The impact of this approach would be to reduce the number of homes being delivered generally, in London. As mentioned previously, it costs more to deliver family sized homes, and the density that can be achieved on sites is reduced, consequently, some sites may not be developed as it may be unviable to provide family homes on them as a priority. The RSL sector would still be well placed to continue to provide these homes provided the funding is available at the right levels (see 2) above). It must not be forgotten that London's housing needs are varied and complex, and therefore a range of homes are required to meet the capital's needs, so the danger would be that much needed smaller homes are not built and 'first-time buyers suffer the brunt of this approach.

On the supplementary questions we are able to respond to a couple of points:

Challenges to increasing supply

- The issues surrounding housebuilding economics on increasing the supply of larger homes

For RSLs the issue is one of cost of delivery and grant requirement.

- I. Residential land cost is high in London due to the severe imbalance between the supply and demand of new homes.
- II. The costs of construction are higher for RSLs due to the requirement to meet the HCA design standards.
- III. Statutorily we are restricted on the level of rent that can be charged for the homes that we build. Consequently the gap between the delivery cost and the loan that the rent can support, has to be met by public subsidy.

Therefore the only ways this equation can be 'balanced' are as follows:

- a) Land prices fall so that delivering new larger homes costs less;
- b) Design standards are reduced for HCA funded schemes so that delivering new larger homes costs less;
- c) Rent restrictions are lifted so that the rent levels can be increased to pay off the loan over 30 years; and
- d) Grant rates are increased to make the provision of large family social rented homes financially viable.

- The impact of housing budget restrictions on the provision of social rented housing in London is that the number of social rented homes that can be delivered will be reduced. Land values in London are unlikely to fall to the extent required to have a significant impact on the cost of delivering new homes and consequently the level of grant input (ref. points above).

Other measures for increasing supply:

- See our answer to question 2 above. This deals with the very important grant rate issue.
- The mayor has responsibility for planning policy in London via the London Plan, and we would expect that this be used as a mechanism for encouraging the development of more family sized homes across all tenures. It is important however, that there is a level playing field in terms of design standards across both 'public' and 'private' schemes, which would make the land market more competitive for all 'players' and more likely to deliver more homes, larger or otherwise.

I do hope our response helps you with the review, and we look forward to reading the outcome.

Yours sincerely

RESPONSE:

From

London Borough of Redbridge Housing Service to:

London Assembly Planning and Housing Committee
consultation letter of 21st July 2010

Q1, What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problem of more Londoners in overcrowding”

Q3 a The Mayor has plans to tackle overcrowding in social rented housing by: Introducing a target that 42 percent of new social rented homes should be three bedrooms or more

Q4 What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London’s housing needs?

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes? Q2 and Q3b are answered separately below

a. We would welcome the increase in supply of larger family homes, given the high demand for larger affordable homes in the Borough. However consideration must be given to the location and quality of any additional supply and the consequences of restricting the provision of smaller properties.

b. We also have a great need for smaller accommodation, which the imposed moratorium could exacerbate. This could inadvertently have an adverse impact on under-occupation schemes. For example this might restrict the availability of newer 1 and 2 bedroom properties as an attractive option for people who are currently under-occupying in all sectors, particularly older people and restrict the flow of single adults from overcrowded homes who move out to smaller property to relieve overcrowding in the family home.

c. We believe that overcrowding in social and private sector (owned and rented) are intrinsically linked, and would encourage better use of research across all sectors in the development of a holistic approach towards tackling overcrowding. When considering planning and development policy we need to balance actual need with the aspirational or expressed need of the population.

d. We are aware that the market is affected by lifestyle issues and social change.

For example

- There is an increasing need for many to work at home, likely to increase in relation to cuts and efficiency savings, where office space is of a premium.

- People live at a distance from families and there are more split families requiring temporary stays
- People have more possessions (storage) including electronic (noise pollution where someone is doing homework for example).

This all places a greater demand on space and quality and the success of communities.

Most single people or couples who are purchasing or renting aspire to at least two bedrooms, partly because of the above modern day needs, because of small room sizes in newer homes or because they plan to have a family or older relative living with them at some point. We are not just talking about younger people here as there is a high demand from middle aged singles. The most significant percentage of the Borough (here and most other probably) will be the over 60's and under 5s, so demographics and effective use of the SHMA are important. There are different but equally important needs for 1 and 2 bedroom developments.

e. We are concerned that the impediment of a moratorium would seriously hamper the continuation of existing schemes.

f. However targets have led to greater number of developments for single people, thus impacting on the sense of community, especially if younger occupiers are absent during the day. So location is as important as bedroom category, we need more family sized accommodation in Town Centres.

g. It is important to encourage community cohesion and local economic growth to ensure diversity of age and status and family size within our town centres. Redbridge has been particularly hard hit in recent years by the development of out of town shopping centres and our excellent transport links make it easier for people in the borough to both work and shop elsewhere. With the Olympic site proposals for massive retail development our major Town Centre in Ilford and all the other town centres in the Borough (which are all a couple of stops on the tube from Stratford) will continue to struggle commercially.

Q2, What are the obstacles to increasing the supply of family homes

a. Planning regulations would in some instances, need to be flexible to enable the demand for larger properties to match the need. A more holistic view on the part of planners would be beneficial in attracting investment from developers.

b. We are interested to acquire more detail of the New Homes Bonus Scheme announced by the Minister last week and hope that other factors besides numbers of properties will be taken into consideration.

c. Housing standards would need to be reviewed to ensure that larger properties are adequately built to accommodate families. All too often many of the new build properties are inappropriately designed.

The provision of open plan kitchen/living rooms is proving to be unpopular with the needs of large growing families, particularly seen within the BME community.

Additionally; ensuring sufficient space standards are applied as the provision of a 3 bedroom property where 2 or more of the bedrooms are double would be a better use than 4 bedroom property containing 1 double and 3 single rooms is an imprudent use of a valuable resource.

Equally we have seen flats built and marketing under shared ownership schemes with two bedrooms one of which is unable to contain a single bed.

d. The value of land, in the current economic climate many developers are reluctant to enter into PFI's and/or have having difficulty in obtaining financing. Issues relate to land banking, restricting the availability of suitable sites where sufficient infrastructure is available

e. The return on investment on the part of developers causes them to consider the profitability of a development rather than the longer term, lifetime home approach.

f. There are frequently local objections to larger developments or restriction in planning regulations, preventing the provision of larger properties in suitable locations. Local objection would be less likely in Town Centres where there is already a local infrastructure to support the provision of larger homes. However the issue of school places will become even more important if most of the homes provided are only aimed at larger families.

Question 3b

The Mayor has plans to tackle overcrowding in social rented housing by:

Implementing the mayors target to reduce Under Occupation within social housing

The effectiveness of implementing the Mayors action plan to reduce under occupation in social housing

a. In summary there needs to be a fully integrated approach to resolving the problem including making best use of the accommodation already available across tenures.

To concentrate on new build without giving equal (or more) resources into the existing sources of underused property is not cost effective in terms of direct costs or social impacts (i.e. is immoral and costly).

b. Yes we need to build properties but in a range of sizes with larger rooms, of good quality in the areas of most benefit to the occupants, community and economy.

However, overcrowding strategies need to be comprehensive and supported financially to provide a multi pronged approach across all sectors in order to represent excellent return on investment by meeting multiple community needs.

c. Targets without the support of additional resources would be formidable to achieve. The approach must be the development of a creative and timely strategy to provide desirable options for those currently under-occupying but not just in the social sector.

d. Action is all the more imperative because of the proposed changes to Local Housing Allowance in 2013, restricting LHA to the size of the family, would place all social landlords in a dire position without resources to assist under occupiers to move whilst managing their increasing rent arrears.

e. Examples of policy initiatives that would assist in redressing overcrowding would be greater flexibility within allocation policies and opportunities for greater national mobility. Making better use of all housing will have a beneficial effect on communities; bringing empty properties back into use; to be leased as social housing, particularly larger homes, would add to the provision of family accommodation (e.g. purchase and repair schemes, equity release schemes with funding reverting on sale of the property).

f. The benefit in achieving under occupation moves is experienced by at least two families, the person moving out to more suitable accommodation and an overcrowded or homeless family moving into the vacated property

e. Many of our older Under Occupiers want to move nearer to family who have moved out of London. This applies to public sector tenants and owner-occupiers. The GLA could take a role in linking London Authorities with the counties enabling more mobility.

g. In the case of older property owners vacating larger property, this could be released to the Local Authority for temporary accommodation (for the duration of the older person's life). This would put the council in more control of the rents, significantly reducing the cost in benefits to the public purse. The older person would receive an income and a better quality of life from the income and the move to a preferred area near to relatives. The property would be maintained (if in poor condition, through self financing renewals policy for equity release) and the area enhanced (i.e. win, win, win). A preliminary survey in Redbridge easily found 200 older people who were interested in this approach but we need funding for staff to implement this and other strands of the overcrowding strategy now that CLG funding will no longer be available.

h. A dedicated policy unit charged with coordinating the London response would be useful as Boroughs are often pitted against each other because of local market factors. The current economic climate requires the pooling of knowledge and resources between Local Authorities and Strategic Partners, standardisation of processes and synergy so that some of these ideas become the national norm, thereby achieving effectiveness and economies of scale.

Supplementary questions

Challenges to increasing supply

Impact on housing budget reductions on the provision of social rented housing in London.

- Economic issues that would increase supply include improving access to mortgages, home buy schemes do not provide a vast range of opportunities, for aspiring homeowners, particularly, those who have the means to pay.
- Allowing Local Authorities to retain the receipts of properties sold under the right to buy schemes, which could be reinvested back into social housing, either through council developments, the provision of mortgages or cash incentives.
- Budget reductions from funds that have increased the supply of accommodation, will mean less opportunities to manoeuvre creatively, for example; Capital programmes: i.e. extensions and deconversions, not only provide relief from overcrowding but also the social and medical consequences incurred. Enlarging a home is a valuable, cost effective holistic approach to redressing more than one problem.
- CLG grant funding for Tackling Overcrowding, provided the impetus needed to begin developing initiatives; the lack of continued funding may result in many programmes being unfulfilled.
- Regeneration programmes, enabled the development of improved infrastructure, without which we believe, would interrupt opportunities for continued community cohesion.

Appendix 1

Information on the waiting list for social rented housing – numbers and size of home required, including scale of overcrowding.

Total on CBL on 01/07/2010

Bedroom Size	Number of Applicants	...of which have an RP for overcrowding	...of which are overcrowded LBR tenants
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Draft Response to London Assembly
26.08.10

Studio	2922	504	0
1 bed	1075	133	7
2 bed	3793	847	59
3 bed	2117	615	139
4 bed	471	163	25
5+ bed	70	25	5
Total	10448	2287	235
%age Total Change from prev. qtr	-17.36%	-20.97%	+9.30%

Please note: that the reductions indicated above, was the result of a review of London Borough of Redbridge - Housing register, completed in Spring 2010.

From the above data we have been able to identify 2287 Overcrowded Households with a reasonable preference, their requirements are as follows

Bedroom Size	Demand
2 bed	847
3 bed	615
Studio	504
4 Bed	163
1 bed	133
5 bed	25
Total	2287

Of the above number we identified 50 severely overcrowded households; their housing needs are as follows

Bedroom Size	Demand
3	17
2	13
4	9
5	8
6	1
7	2

A POLICY AND GUIDE TO THE HOUSING ALLOCATION SCHEME

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Issue	Author	Approval Date
Original	LB Redbridge	
Version 2	Rachel Khan; Campbell Tickell	23 March 2010

1.0 Introduction

- 1.1 This guide outlines the policy and information about the Choice Homes Scheme. It tells you how to apply for housing, how we decide whom to help, what help is given and how offers of accommodation are made. If you do not understand anything in this guide and you would like to speak to someone, please call at the:

**Housing Advice Centre
17-23 Clements Road
Ilford
Essex IG1 1AG**

- 1.2 You can also write to us at this address or telephone the Housing Duty Line on **020 8708 4002/4003**
- 1.3 The 'Choice Homes Scheme' is operated by the East London Lettings Company (ELLC). They manage this on behalf of the London Borough of Redbridge and its consortium partners. The ELLC is a not for profit company set up on behalf of its member landlords to offer more choice to customers seeking affordable housing.
- 1.4 The **London Borough of Redbridge** is in partnership with the **landlords listed against the East London Letting Company** who have agreed to operate a regional lettings system.

2.0 Choice Based Lettings Policy

2.1 Aims of the Policy

The policy aims to:

- Offer applicants a more active role in choosing accommodation taking account of individual circumstances and waiting time.
- Meet the wider objectives of this district's housing needs as set out in the Authority's Housing Strategy.
- Maximise the use of and efficiently let all housing stock available to the Council. Provide applicants with sufficient information to make informed choices about opportunities for rehousing and understand the criteria and process adopted by the Council.
- Offer applicants open and fair access to housing, provide choice and recognise diverse needs.
- Promote sustainable communities.
- To reflect a balance between the housing needs of existing tenants and new tenants, whilst ensuring best use of our stock.
- Realise better service quality and deliver a Best Value lettings system.

2.2 Who can apply?

2.2.1 Anyone over the age of 16. (This includes Council Tenants).

2.2.2 Applicants aged 16 and 17 years will require a rent guarantor before taking up any property.

2.3 Exceptions to who can apply.

- 2.3.1 If you are subject to Immigration Control and your status specifically excludes you from public housing assistance, or if you are not habitually resident in the common travel area (England, Scotland, Wales, Ireland, Channel Islands and the Isle of Man) you will not be able to apply for a home under the scheme.
- 2.3.2 The Council can also exclude you from joining the Scheme if, your behaviour as a tenant or the behaviour of a member of your household is or has been in the past unacceptable (for example, if your landlord is evicting you or you were previously evicted from accommodation because of serious anti-social behaviour).

2.4 How you can apply?

- 2.4.1 All applicants will complete a 'Choice Homes' application form. You can pick one up at the one of the following offices:

Housing Advice Centre, 17-23 Clements Road, Ilford, IG1 1AG	The Orchard Housing Office 152 Broadmead Road, Woodford Green, IG8 OAG	North Housing Office 113 Manford Way, Chigwell, IG7 4BX
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- 2.4.2 A form can be sent to you if you telephone 020 8708 4002/4003.
- 2.4.3 You can also download a form from the ELLC website: www.ellcchoicetohomes.org.uk.
- 2.4.4 Once you have completed the form you should return it or post it direct to the Housing Advice Centre.
- 2.4.5 If you require assistance in completing the form or you have language or literacy difficulties you may call into the Housing Advice Centre where you will be given appropriate assistance.
- 2.4.6 We will arrange to visit applicants who have difficulty attending the Housing Advice Centre.
- 2.5 Changes in circumstances
Once your application has been assessed it is your responsibility to keep us informed of all changes in your circumstances which relate to your household and your housing application. Offers of accommodation are based on the suitability of a property for a household and it is important that this information is kept up to date.
- 3.0 How your Application will be assessed if you are eligible to register.

3.1 Reasonable Preference.

- 3.1.1 The Council will investigate your circumstances and a housing options officer will assess your needs to decide whether or not you have a **Reasonable Preference** for rehousing.

3.1.2 The law states that the Council must give Reasonable Preference to people who fall into any of the following categories. If they are:

- Homeless as defined by homelessness law.
- Homeless persons owed certain duties by any Housing Authority occupying unsanitary or overcrowded housing or living in unsatisfactory housing conditions.
- If they have serious medical or welfare problems which are directly related to their current housing circumstances.
- If they need to move to a particular locality in the district to avoid hardship, either to themselves or to others. For example an elderly or disabled person may need to move closer to a relative to enable them to give support.

3.2 The Bond Scheme

3.2.1 This is available to applicants who are threatened with homelessness; where the Council would otherwise go on to accept a full housing duty under the Housing Act 1996 Part VII, if the household were not offered assistance in obtaining accommodation in the private rented sector.

3.2.2 Applicants who qualify and accept an offer of an Assured Shorthold Tenancy from a private sector landlord under this scheme will be awarded the same level of priority as an applicant who is owed the statutory homelessness duty. **This award was introduced in** September 2009. Cases may be backdated at the discretion of the Council.

3.2.3 Applicants who are owed a statutory homelessness duty who vacate temporary accommodation for an offer of an assured shorthold tenancy in the private sector (a "Qualifying Offer"), will retain the same level of priority as applicants who are owed a statutory homelessness duty. This award was introduced in September 2009. Cases may be backdated at the discretion of the Council.

3.2.4 Existing rules within the Allocations Scheme regarding change of circumstances will continue to apply.

3.3 Cumulative Reasonable Preference

3.3.1 The Reasonable Preference categories will not be treated in isolation from one another. An applicant that qualifies under more than one category will have this taken into account when assessing their housing need.

3.3.2 An applicant who falls within two Reasonable Preference categories may be given more priority than an applicant who falls within one

3.4 Additional Preference

3.4.1 Additional Preference may be awarded by a senior officer to certain applicants who fall within the Reasonable Preference categories and have an urgent housing need, these include:

- Applicants owed a homelessness duty as a result of being;
 - A victim of domestic violence
 - A victim of racial or sexual harassment
 - A witness of crime or victim of crime who would be at risk of intimidation amounting to violence or threats of violence if they remained in their current home

Or

- Applicants who need to move because of urgent medical grounds.

3.4.2 Additional Preference will be awarded in these (and possibly other) situations, if we are satisfied that your circumstances are such that it is **impossible for you to remain in your current accommodation.**

3.5 Transitional Protection

Some applicants who were awarded overriding priority or outright medical priority under the previous allocation scheme may not have as higher priority under the new scheme. These applicants have been given an expectation that they were a high priority for rehousing. Therefore, some applicants who had overriding priority under the old allocations policy will be awarded Additional Preference in the new allocation scheme.

3.6 No Reasonable Preference

If you do not fall within the Reasonable Preference or Additional Preference categories listed above your application will receive very low priority within the scheme.

3.7 How will your Effective Bidding Date be calculated?

3.7.1 For existing applicants their registration date is the date when they first applied to the Housing Register or for new applicants when we receive their application. However, should an applicant's assessed housing need change necessitating the provision of a particular type of accommodation or property with more or less bedrooms than originally needed; the effective date will be that when the new need arose. This date is also referred to as your Effective Bidding Date.

3.7.2 Your effective date will be cancelled in the following circumstances:

- If you are rehoused by a Council or another social housing provider, such as a Housing Association. If you wish to apply for a move from your new address, then you will have to make a fresh application.
- If you become an owner of a property. If you wish to apply from your new address, then you will have to make a fresh application.
- If you do not reply to any reviews that the Council conducts.
- If you subsequently re-apply, your effective date will start again and will not be backdated to the earlier date. If you had a previous application that had been cancelled for this, or any other, reason we will not generally reinstate you on the list with your old application date unless it can be proved that an official error has occurred.

3.8 What size of property can you bid for?

3.8.1 Large homes are in short supply. We therefore have to make sure homes are fully occupied but not overcrowded. To ensure consistency we use the following guidelines to determine the size of accommodation, which will be offered to different sizes of household. The table below shows the size of home that you can normally apply for:

SINGLE APPLICANT	BEDSIT
SINGLE APPLICANT (PREGNANT) / COUPLE WITHOUT CHILDREN (INCLUDING PREGNANT)	1 BEDROOM
PARENT/S WITH ONE CHILD PARENT/S WITH TWO CHILDREN (SAME SEX) PARENT/S WITH TWO CHILDREN OF DIFFERENT SEX WHERE BOTH ARE UNDER 10 YEARS OF AGE TWO ADULTS (NOT CO-HABITING COUPLE). FOR EXAMPLE, APPLICANT AND FULL TIME LIVE IN CARER.	2 BEDROOMS
PARENT/S OF TWO CHILDREN OF DIFFERENT SEX WHERE ONE IS OVER 10 YEARS OF AGE PARENT/S WITH THREE CHILDREN PARENT/S WITH FOUR CHILDREN (except those who can apply for four bedrooms as described below)	3 BEDROOMS
PARENT/S WITH FOUR CHILDREN WHERE THERE ARE THREE CHILDREN OF THE SAME SEX AND ONE OF A DIFFERENT SEX, AND CHILD OF DIFFERENT SEX IS OVER 10 YEARS OF AGE.	4 BEDROOMS

3.8.2 In certain circumstances there may be health or social grounds to support the need for households to have additional bedrooms to the situations described above.

3.8.3 Definition of Bedroom sizes

- A double bedroom must have a minimum floor area of 10 square metres.
- A single bedroom must have a minimum floor area of 5 square metres.

3.9 Letter to confirm your registration on the Scheme

Shortly after your application has been received, you will receive confirmation in the post. The letter will advise you of your registration number, your effective bidding date, and the applicant category you have been placed in. If you are eligible to bid for properties under the scheme, it will also tell you the size of property you will be allowed to bid for.

4.0 How the Council will allocate accommodation

The Choice Homes Scheme is a 'choice based' lettings system whereby we advertise available properties and invite applicants to bid for them. Essentially this will enable applicants to choose where they want to live. However, not all properties that become available will be advertised because in certain limited circumstances we will continue to make direct offers.

4.1 Direct offers

4.1.1 Additional Preference

Where an applicant has been awarded Additional Preference s/he may participate and bid for properties under the Choice Homes Scheme. The Council will however, make one direct offer of accommodation to him \ her. If this offer is refused the applicant may continue to participate in the Choice Homes Scheme, but he/she may lose their Additional Preference.

4.1.2 Under-Occupation Transfer Group

If you have a secure Council tenancy and you are prepared to move to a property with fewer bedrooms than you have now it is in the Councils interest to ensure that you move as quickly as possible. The number of direct offers made will be at the discretion of the Chief Housing Officer. Applicants in this group may still bid for properties.

4.1.3 Police Referrals

In certain circumstances the Council may be required to provide accommodation for applicants referred by the police. Applicants in this group are excluded from the bidding process.

4.1.4 Special Schemes Group

The law allows the Council to make direct offers to certain groups of people who have been nominated to the Housing Service by other agencies because of their special needs, for example, care leavers and people with learning difficulties or those who need to move from supported lodging. Subject to identifying a suitable property, the Council will make one direct offer of accommodation. Applicants who fall within this category may still participate in the Choice Homes Scheme.

4.1.5 Sheltered Housing

Applicants for sheltered housing will continue to be made a direct offer of suitable accommodation from the relevant Registered Social Landlord (RSL), subject to their choice of scheme (This group cannot bid because at present sheltered housing will not be advertised.)

4.1.6 Can people given a direct offer choose where they live?

We have divided the Borough into seven areas, and you can choose which of these areas you are willing to move to. There is no maximum or minimum number that you must choose, although you must choose at least one area. However, the number of areas you choose will affect the length of time you will have to wait for an offer of accommodation. Obviously, the more areas you choose, the easier it will be to help you.

4.1.7 Can people given a direct offer specify the type of property and whether it is a Council or Housing Association Tenancy?

You may be offered any type of property unless there are medical grounds, which means that you can only live in a particular type of home. Medical grounds can only normally be taken into account if they have been assessed by us before an offer of accommodation is made, so you must tell us about any illness or disability that will affect the type of property you can live in.

You may be offered either a Council or a Housing Association property. Housing Associations are non-profit making organisations, which provide homes for rent in a similar way to Councils. The Council is able to nominate people for a high percentage of Housing Association properties when they become available for letting.

4.2 Local Lettings Policies

- 4.2.1 From time to time the Council in consultation with Registered Social Landlord partners and local communities may decide to adopt local lettings policies. This means setting aside properties on a particular estate or area, or certain types of property across a housing stock for applicants who meet a certain criteria defined under the policy. The purpose of such policies are to encourage residents to develop lasting connections with the area to help sustain a community; to deal with concentrations of deprivation; to create more mixed communities for example by setting aside a proportion of properties for employed applicants; or to reduce overcrowding and tackle other housing needs in the local area.
- 4.2.2 A local lettings scheme must be agreed by the Council in consultation with Registered Social Landlords and local communities. Homes will be advertised through the choice based lettings scheme as only suitable for applicants who qualify under the policy. Bidding will be restricted to qualifying applicants. Applicants will then be short listed in the normal way and homes offered in priority order.
- 4.2.3 If it is not possible to let all the available properties earmarked under a local lettings policy the remaining properties will be re- advertised and the policy criteria to qualify will not be applied. Properties suitable for applicants with high priority needs, for example with special needs adaptations, may be excluded from the policy.

4.3 Choice Based Lettings

This scheme enables all applicants who are eligible to bid for properties, which are advertised on a weekly basis in the Choice Homes magazine. To ensure that we fulfill our legal duties, the majority of properties will only be available to those applicants who have been awarded Reasonable Preference.

<i>Tenant Seeking Transfer (T)</i>	If you are a Council Tenant, you may bid for properties that are labelled in the 'Choice Homes' magazine as (T) .
<i>Priority Homeseeker (PH)</i>	If you are not a Council Tenant and have been awarded Reasonable Preference, you may bid for properties labelled in the 'Choice Homes' magazine as (PH) .
<i>Homeseeker (H)</i>	If you have not been awarded a Reasonable Preference, you may bid for properties labelled in the 'Choice Homes' as (H) .
<i>Homeless Homeseeker (HH)</i>	Occasionally the Council will ring fence properties for applicants to which it owes a homeless duty. In this case they will be marked (HH) .

4.3.1 How you can bid for a property

You can make up to two bids for any properties that are advertised fortnightly in the magazine as being available to your particular applicant category. This can be done either by telephoning the bidding hotline or over the Internet, by using the special website. The Choice Homes magazine will provide you with full details of how to make bids. You must make a bid before the closing date, which will be stated in the property advertisements.

4.3.2 How properties will be allocated

When bidding closes the system will sort the bids for each property by the applicant's priority need and then their effective bidding date. See section 3.7 to see how this is calculated. The process of sorting the list is called shortlisting.

Applicants with a preference will be ranked higher than those without one. Those with the most preferences will be ranked highest of all. The ranking order is:

- Additional Preference.
- Reasonable Preference.
- Those who have waited the longest.

This ranking is only applied where a property is labeled Homeseeker (H). If the applicant who has been offered the property refuses it, the property will be offered to the next person in line in accordance with the above formulation.

4.3.3 Offers and other factors determining priority

In addition to waiting time and housing need the law allows the Council to take into account the following factors in deciding whether to allocate a property to you. Checks are made to establish:

Income and finances – If you have sufficient resources or own your own property this may result in you receiving less priority than would otherwise be the case. A credit reference check will be done and we may ask you for evidence of your savings and investments.

Suitability to be a tenant – Unacceptable behaviour by you or a member of your household may result in you receiving less priority than would otherwise be the case. This may cover a range of things from rent arrears to antisocial behaviour. We will check with your landlord whether they are seeking a possession order. We will also check whether there are rent arrears on your rent account of £250 or more. You may be given the opportunity to clear these arrears before an offer is made.

Local connection – Consideration will be given to whether or not you have a local connection with this Borough. The Council will check whether you are normally resident in the Borough which means you must live in it for 6 months out of 12 and 3 years out of 5. If you are employed within this Borough or if you have family connections or special circumstances that require you to live locally we will also class these as a local connection. If you do not have a local connection this may result in you receiving less priority than would otherwise be the case. We use the definition of family connection as stipulated by the regulations in relation to Allocations and Homelessness. These family members must also have resided in the borough for the periods indicated above.

Invalid Assessment – All shortlisted applicants that have a change of circumstance will be reviewed. Overcrowded cases will be visited.

4.4 Refusals

4.4.1 You will not generally be penalised for refusing any offers of accommodation made to you through the Choice Homes Scheme.

4.4.2 However, if you refuse an offer of suitable accommodation which is deemed reasonable and you are a homeless applicant who has been placed in temporary accommodation by the Housing Advice Centre, action will be taken to cancel your application, evict you from your temporary accommodation and you will have to find your own accommodation.

4.4.3 Likewise if you had previously been awarded an additional preference and you refuse an offer, your application will be reviewed which may result in the removal of that additional preference.

5.0 Information on properties that have been let.

5.1 Housing Authorities operating an open advertising scheme, whereby applicants can apply for particular properties are expected to provide information about the properties, which have been let. The 'Choice Homes' magazine will provide information on properties let that were advertised in the previous issue. This will include bedroom size, number of bids for each property and the date on which successful applicants applied to join the Scheme.

5.2 Such feedback will enable you to assess your chances of success in subsequent bids

6.0 Notification about a decision and the right to a review.

6.1 All applicants have the right to information on:

- Why they have been excluded from the allocation scheme detailing the reasons.
- Any decision regarding exclusion from the Reasonable Preference or Additional Preference categories.
- Any decision on the facts considered in making an allocation of property.

6.2 Applicants also have the right to request a review in writing on any decision made by the Housing Service and are informed of the decision and the grounds for it. The local authority when informing the applicant of his/her right to a review will also inform the applicant that he/she has the right to be informed of the decision of a review and the grounds for it. If you wish to request a review, you will need to give your reasons in writing within 21 days from the date of your decision letter. An officer who is different from the one who made the original decision and more senior will hear the review. We have 56 days to write to you with a decision from the date of your review request. A review decision is final. However, where there is fresh evidence to take into account we will reassess the application.

6.3 The Council will aim to review all applications every 12 months to ensure that all the information is accurate. If there has been a change in your circumstances, your case may be reassessed.

7.0 What if you are unhappy with the way you have been dealt with?

We are not always able to help in the way you would like. If you feel that you have been dealt with incorrectly or unfairly, you should contact 'Customer Help and Information' (complaints), telephone number 020-8708 2447 and ask details of the Council's complaints procedure. Your complaint will be allocated to an appropriate manager.

8.0 Allocation of Accommodation which does not fall within the Choice Based Lettings Scheme or Part VI of the Housing Act 1996 (as amended by the Homelessness Act 2002)

8.1 Decant Group

8.1.1 In certain circumstances it is necessary for the Council to relocate residents because of the physical condition or location of their property. The Council has statutory duties to assist such residents with rehousing. The Council will therefore make direct offers to people in the following circumstances apply;

8.1.2 If you are a Council tenant living in a property that requires major repairs or rehabilitation works or living in a property that needs to be vacated as part of a regeneration or improvement scheme.

8.1.3 If you are a private sector tenant who is forced to leave your home because a compulsory purchase order has been served.

8.1.4 If you are a private sector tenant living in a property in poor structural condition which you are forced to leave because the Council has served a closing or demolition order on your landlord.

8.1.5 We may make you more than one offer. These offers may consist of temporary or permanent accommodation depending on your circumstances and the nature and extent of the works that are required in your home. You will still be able to participate in the Choice Homes Scheme.

8.2 Mutual Exchanges

Applicants participating in mutual exchanges within an RSL's stock or between housing authorities and RSL's do not fall within the scope of Choice Based Lettings.

8.3 Succession, Assignment and Property Adjustment

Where a tenant is entitled to succeed or is to be assigned a tenancy such succession or assignment does not fall within the scope of Part VI of the Housing Act 1996. Also where a tenancy is transferred under matrimonial law the transfer does not fall within the scope of Part VI of the Housing Act 1996.

8.4 Chief Officer Discretion

8.4.1 A chief officer has delegated authority to make an offer to an applicant outside the normal rules of the scheme in exceptional circumstances. The circumstances in which such authority can be exercised shall be: -

- a) Where the applicant has an exceptional need or where a combination of social/welfare/medical/ urgency/ or safety factors occur that cannot be adequately dealt with by application of the normal rules of the Allocation Scheme.

- b) Where it is in the Council's interest to award additional priority for: effective management of the housing stock; or for financial or legal reasons; or in order to support achieving key objectives; or in meeting strategic priorities; or to remedy an injustice.

8.4.2 This authority may be delegated to an officer panel by the chief officer to consider cases and decide accordingly whether they fall within the circumstances above.

KIER PARTNERSHIP HOMES (KPH) OSRH009

GLA: STRATEGIC POLICY RESPONSE TO REDUCING OVERCROWDING

AUGUST 2010

Hypothesis: If the focus of housing strategy was to shift towards increasing the supply of bigger homes, it may have a more significant impact on solving housing problems at every level than the current target-driven approach that produces more, smaller, homes.

1. Our views on the proposition that increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding

Housing need for social rented and intermediate housing remains unmet across all bedroom sizes. It could be argued that families are more likely to be overcrowded than one and two person households. However, there is little evidence that this is the case.

Whilst larger households are more likely to be overcrowded than smaller households, there are far fewer of them than one, two or three person households in housing need, so the numbers that are overcrowded could be the same or even higher for smaller households (particularly when hidden homelessness is taken into account).

The proposed planning policy of focusing on increasing the supply of affordable family housing (particularly social rented) is therefore a means of moving as many children into decent housing. It is surely a laudable aspiration for that reason, but whether it would take more Londoners out of overcrowding is difficult to determine.

When the challenges of delivering family housing in London are added to the equation (as set out in the following paragraphs) the impact of the policy could end up delivering fewer homes than anticipated.

2. What are the obstacles to increasing the supply of larger family homes?

Because of the traditionally high density, bulk, massing and height of housing in London, new developments will maximise their value by constructing similar housing.

This generally means building one and two bedroom flats. The benefits of this model is that amenity space and education contributions as part of Section 106 agreements are minimised, whilst values will be kept at relatively low levels that will attract mortgage finance and investors, and therefore purchasers.

Given that the vast majority of new affordable housing in London is delivered through the planning system, the private housing template for flatted schemes tends to be replicated in the affordable housing element for design and logistical reasons.

Family housing can be included within such developments, with 3+ bed flats and duplexes being provided. However, family social rented housing has a very low value per sqm due to the grant per unit approach taken by the HCA (see the answer to 5.ii.a below) and the inelasticity of rents for larger units.

In addition, amenity space will have to be provided for children living in family homes (meaning less space for housing) and education payments made within the Section 106 agreement.

Overall, social rented family housing is a drain on the financial viability of private developments. This is likely to become even more of a challenge as grant rates are squeezed over the next few years. All things being equal, less social rented family housing can be provided through the planning system than can be achieved through one and two bedroom flats.

Meanwhile, local authorities have long sought to move people out of homes they are under-occupying through financial incentives and the promise of more appropriate accommodation for their needs. A recent survey in the south east London sub-region identified 51,860 under-occupying social rented households, compared with 18,640 overcrowded social rented households.

The main reason it is so difficult to reduce under-occupation is because tenants of social rented housing have security of tenure and so can refuse any requests by their landlords to move. In addition, family homes (particularly in local authority stock) tend to be houses with relatively high values which tenants are loath to leave.

Other options, such as the de-conversion of flats back into houses and extensions of existing properties, tend to be expensive and at least partly reliant on public funding.

- 3. The Mayor has plans to tackle overcrowding in social rented housing by introducing a target that 42% of new social rented homes should be 3 bedroom or more and implementing the Mayor's Action Plan to reduce social housing (overcrowding). How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of smaller homes?**

The target level of 42% family social rented housing will encourage councils and developers to provide as many larger units as possible, leading to more larger homes.

However, many councils in London (and elsewhere) have planning policies that seek high proportions of family social rented housing. However, the targets are not being met, although they are leading to more family social rented housing than would have been the case with a lower percentage target.

There are also wide differences in the need for family social rented housing across London's boroughs, with broadly a greater need in central London compared with the outer London boroughs.

The policy target should allow councils flexibility in its implementation, which means that those boroughs where more family social rented housing is either not required or could not be achieved (for example due to viability issues) would not be forced to comply.

However, insisting that 42% of all new social rented homes should be family units would lead to either a reduction in all new homes being completed and/or fewer new social rented completions. This is because of viability, design and logistical issues, as covered in the previous answer.

Smaller schemes would be unable to cope with high proportions of family units, making their scale diseconomies even more problematic and limiting their ability to deliver affordable homes, especially social rented.

For larger schemes, either a large proportion of houses with gardens would be required, in which case reduced densities would risk making schemes unviable.

Alternatively, high numbers of family flats and duplexes (generally ground and first floor only) are likely to cause management issues for councils and RSLs within mixed tenure schemes, whilst placing further pressure on amenity space.

Meanwhile, placing a moratorium on one and two bedroom properties would distort the market so severely that development activity is likely to reduce to a trickle. It is also a policy that would be very difficult to implement, given that many existing planning consents would allow smaller homes to be built.

Indeed, the laws of unintended consequences dictate that such a moratorium would result in fewer family social rented homes being produced than is currently the case.

There is evidence from the market that developers are becoming aware of the need to produce housing for those currently underserved, including more family homes, especially in areas where high numbers of one and two bedroom properties remain unsold for long periods.

Perhaps more market intelligence could demonstrate to developers the over-supply of certain types of housing in particular areas and so steer them towards housing potentially in more demand, rather than directing the market through a form of central control (see the answer to 5.iii.c below).

Otherwise, the only way to encourage developers to provide more family social rented housing would be to raise the amount of grant funding relative to one and two bedroom units, possibly on a per person housed basis (see the answers to 5.i.b., 5.ii.a. and 5.iii.a in Appendices below).

4. What would be the impact of prioritising building a greater number of large homes on other aspects of London's housing needs?

An increased emphasis on producing more family social rented housing is likely to lead to fewer one and two bedroom social rented homes being produced. This is due to the economics of development, whereby as noted already, the larger the social rented unit, the lower the value per sqm. Indeed, there is an increasing reduction in value per sqm as the number of bedrooms increase.

Indeed, evidence shows that where private schemes are asked to deliver a high proportion of family social rented homes within the affordable housing content, less affordable housing overall is delivered. This is especially the case where grant funding is applied on a per unit basis and in a market that is still suffering the consequences of the recession and the banking collapse.

If the 42% policy aspiration were to be rigidly applied across London, the number of affordable homes overall would reduce, as schemes would not be built out and some would come forward with far lower levels of affordable housing than otherwise would have been the case.

However, allowing flexibility at a local level should enable more family social rented housing to be delivered where it is most needed, especially if supported by more grant funding.

Councils and RSLs should also be penalised for selling off family social rented housing unless absolutely necessary, rather than spending the necessary funds to bring them up to the Decent Homes Standard.

APPENDICES

5. Overcrowding

i. Challenges to increasing supply

a. What are the issues surrounding house building economics on increasing the supply of larger family homes?

As noted in previous sections, a combination of fixed grant rates per unit and small rent differentials for larger units means that family social rented housing has a low value compared to smaller social rented housing, shared ownership and particularly private housing.

The only way that scheme economics would not be impacted by providing more family social rented housing is if grant rates and/or rents were to increase to compensate for the lost value.

In addition, more amenity space and financial contributions for education would be required by Section 106 agreements, meaning that land take for amenity space and extra expense are likely to worsen scheme economics even further.

In the current market environment, aggressively seeking more family social rented housing through the planning system will lead to less affordable housing overall.

If then combined with councils insisting on high proportions of affordable housing overall, fewer schemes will come forward for development and achieved levels of affordable housing will fall substantially.

b. What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

When negotiating affordable housing contributions through the planning system in the post-election period, it has become standard practice to assume no grant funding. Accordingly the starting point is for relatively low initial affordable housing on-site, with the potential for more if grant is forthcoming.

In practice, the actual (and anticipated future) budget reductions are therefore already impacting on the provision of affordable housing, with overage agreements and in-lieu payments being used to enable schemes to come forward in an uncertain market.

Further cut-backs in grant funding for London, combined with continuing difficulties in the housing market are likely to place further pressures on the delivery of affordable housing of all sizes and tenures.

ii. Mayor's approach

a. To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?

Grant funding has to be applied such that it encourages developers to provide more family sized units, preferably on a person housed basis.

Additional persons housed to create family units should benefit from extra grant funding. An illustrative example might be as follows, whereby the larger the family unit, the greater the level of grant funding:

- 2 ph @ £30,000 x 2 = £ 60,000 grant
- 3 ph @ £30,000 x 3 = £ 90,000 grant
- 4 ph @ £30,000 x 4 = £120,000 grant
- 5 ph @ £30,000 x 4 + £40,000 x 1 = £160,000 grant
- 6 ph @ £30,000 x 4 + £45,000 x 2 = £210,000 grant
- Etc.

However, given the impending reductions in public spending the above model would almost certainly mean even less grant for smaller units to compensate. However, the pricing mechanism would be applied to steer developers towards providing more family social rented units.

Relaxation of amenity space standards would encourage more family social rented housing, although it is acknowledged that this could worsen the overall quality of accommodation provided, especially for younger children.

b. What other options are available to the Mayor aside from his 42% target for homes with 3 or more bedrooms and those measures contained within his overcrowding Action Plan?

The issue of under-occupying generally is a major problem in London as it appears to be more prevalent than overcrowding. Within the current system it is difficult to see how under-occupying households can be encouraged to move into more appropriate accommodation, apart from through the use of financial incentives.

Further research is needed in this area to see whether alternative inducements, such as households being offered housing located in more attractive areas (possibly on a sub-regional or pan-London basis); alternative housing with aids and adaptations for older or disabled people; alternative housing located in new developments; etc. might encourage under-occupying households to move.

In transfers or swaps outside of the borough boundary, 'host' boroughs could be compensated financially for helping to free-up under-occupied units. The mechanism for compensation would need to be considered carefully.

The introduction of new tenancy agreements providing levels of security somewhere between assured shorthold and secure tenancies would be helpful, with the understanding that households under-occupying over time would be asked to move into smaller housing. The resulting housing would effectively be a variant on social rented housing, with perhaps higher rents for larger properties.

More flexibility of leases (along with new tenancy agreements) could encourage more affordable housing for periods of 20-30 years. This should encourage investors into the market, on the basis that the properties could be sold off at the end of the lease and values would then be released.

iii. Other measures for increasing supply

a. How can variable housing grant rates encourage the provision of more family housing?

This has been covered in the response to 5.ii.a above. More grant for family homes relative to one and two bedroom properties would make it more financially attractive for larger units to be constructed, as their values would become relatively higher.

As a result, developers would therefore be more likely to produce the much-needed family social rented housing as part of private developments.

b. What other ways are there to increase the supply of larger family homes?

This question has already been covered in previous answers in this paper. The key means of achieving this are:

- Increasing grant funding for family social rented housing.
- Introducing the 42% target, but allowing flexibility at the local authority level.
- Introducing new tenancies which would reduce security of tenure for social rented tenants and enable under-occupied properties to be repossessed, as required.
- Introducing flexible leases, enabling families in need to be housed for periods of 20-30 years.
- Conducting more research into the reasons why under-occupying tenants might be encouraged to move into smaller housing.
- Encouraging developers to build more family social rented units through research demonstrating the over-supply of one and two bedroom units in particular areas.
- Compensating 'host' boroughs when allowing under-occupied homes to be freed-up elsewhere in London.

- Penalising local authorities and RSLs who sell off family social rented homes, rather than bring them up to the Decent Homes Standard.
- Increasing rents for larger units on the basis of the new quasi social rented tenancy type.

c. What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

As described in the answer to question 3 above, if there was more information available about the completion of schemes by area, including the types of homes and the number of unsold units, this would help developers to assess whether they should be seeking to provide different types of housing products, such as more family homes.

The 42% target of social rented homes being 3 bed plus should be assessed on a per person housed basis rather than by number of units. This should relate to the calculation of the level, as well as the tenure mix of affordable housing as part of Section 106 schemes.

Section 106 agreements should stipulate that families nominated into these homes will have proven track records of being good tenants. Starter tenancies should also be used where appropriate. This will give comfort to developers that undesirable tenants will be removed from their developments if their behaviour does not meet acceptable standards.

Response to London Assembly Planning and Housing Committee Review on Overcrowding in London

3 September 2010 OSRH010

Introduction

The Royal Institute of British Architects champions better buildings, communities and the environment through architecture and our members. It has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 40,000-strong professional institute is committed to serving the public interest through good design, and represents 85% of registered architects in the UK as well as a significant number of international members.

Summary

The RIBA supports the principle of building more 3+ bedroom social rented homes as an appropriate response to tackling overcrowding in London. However, we would emphasise the need for this measure to be proportionate, and question whether a London-wide target of 42% of new homes to be 3+ bedrooms is a fair reflection of local demand.

There is a need for a detailed assessment of London-wide housing provision:

- There should be a local strategic assessment of housing need to investigate what the market can deliver, and what affordable housing needs to be built.
- London's five Housing Partnerships have traditionally advised local authorities on targets for affordable housing, by recommending what types of homes should get priority and what proportion of new homes they should account for. These partnerships or local authorities themselves could continue to set local targets, rather than meeting one London-wide target.

There is a need for design quality in all new homes

- Whilst the RIBA acknowledges that overcrowding is a serious problem, providing bigger homes should not impact upon the quality of those homes. The decision to deliver more 3+ bedroom homes will only be effective in solving housing problems at every level if design, space, functionality, sustainability and maintenance standards are also met; these factors are equally crucial in creating adequate living environments. The design of these homes should make sure that they are fit for purpose and cater for the needs and lifestyles of larger households.
- Homes need to provide adequate space for furniture, storage, basic activities such as eating or relaxing, and are adaptable to changes in the circumstances of the household, and neighbourhoods need to include adequate public green spaces and good transport routes. The RIBA supports the Mayor's interim London Housing Design Guide as setting good space, functionality and design standards, as part of the solution to this problem. The positive steps taken in the publication of this Guide need to be preserved in any future housing policy shifts.

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Review response

What are your views on the proposition that 'increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding'?

Public Information line
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Registered Charity Number 210 566
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*call charged at 50p per minute

A shift in London housing policy towards increasing the supply of bigger homes – over and above increasing the supply overall – will not necessarily have a greater impact on solving housing problems at every level.

Overcrowding is only one housing problem in London. There is also a severe shortage of homes and the related issue of unaffordability. If family sized homes are prioritised at the expense of 1) delivering more homes in total and 2) meeting the needs of the growing number of single person households, then the overcrowding problem will be replaced with even longer social housing waiting lists, low income households being driven out of London, and smaller households facing serious social and economic barriers. Further, as explained above, housing design can impact upon housing problems even if the new target for family sized homes is observed. Design quality will be imperative in improving housing conditions.

What are the obstacles to increasing the supply of larger family homes?

The most important factors are the affordability of land, and the current land development system. Affordable housing providers have to juggle finances to strike the right balance between the cost of development, and the quality and size of the homes developed. The current land development model does not accrue land and house price inflations back into the public purse, so affordable housing providers have a small amount of grant with which they must compete against private developers with different business models that enable them to accrue land value profits.

- Traditionally, more small homes can be built on a site and this allows a more effective delivery of grant. Density standards therefore drive the delivery of smaller homes.
- There is the added problem that in a densely developed city like London, often the sites are small infill sites and larger homes are difficult to design on this space.

However, these are challenges that architects, planners and developers should embrace – the end result will be better quality homes and better communities. The industry should think creatively about housing density and how to deliver quality, appropriately-sized homes within the constraints of the city environment. Reports such as Urhahn Urban Design's [*Housing Intensification*](#) and MJP Architects' [*Sustainable Suburbia*](#) investigate methods of building high density housing with new typologies that fit with what consumers want and do not impact negatively on public spaces. The reports suggest housing design solutions and offer example neighbourhood streetscapes that combine sustainable living with attractive and community-orientated environments, suggesting solutions in which density is not synonymous with social problems.

The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42% of new social rented homes should be three bedrooms or more and**
- **Implementing the Mayor's action plan to reduce [overcrowding in] social housing.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

The RIBA welcomes the Mayor's action plan to reduce overcrowding in social housing and the measures he plans to take in the capital.

We would like to offer the following comments and suggestions:

-
- We wholly support plans to increase space standards in new homes; e.g. if bedrooms and other core living spaces are of an adequate minimum size, they can be used more flexibly by growing families.
 - Where extensions to existing properties or space-saving furniture are used (Mayor's Overcrowding in Social Housing Action Plan, 3.1.1), post-occupancy evaluations should be carried out to understand whether these measures do contribute to easing the problems caused by overcrowding (such as those outlined in The GLA and London Assembly Report 5, 22 June 2010, 3.8). The RIBA would be keen to support this research, not only by helping to design and undertake it, but also by communicating results and recommendations back to architects.
 - We support the suggestion that Local Authorities undertake an audit of all 2+ bedroom homes to identify definitively which are underoccupied (Mayor's Overcrowding in Social Housing Action Plan, 3.1, p31) and incentivise tenants to downsize where it is appropriate to do so.
 - We would also like to ask whether waiting lists for social housing have been analysed to ascertain whether there are more families waiting for homes than 1-2 bedroom households? And have the household incomes and circumstances of these groups been analysed to ascertain which groups are in most need of social rented homes?
 - We propose that a major study needs to be undertaken to examine in detail how households use space, and to explore the implications of London's small homes on the lifestyles and living standards of households. The Parker-Morris standards raised space standards for 20 years after their introduction in the 1960s, but these standards need updating and new research is essential to improve the design of homes today. The investigation should examine whether a lack of space and storage requires homeowners to move more frequently leading to market instability, and whether modern homes are adaptive to modern and changing needs, to whether the family sit down together at meal times and links to family and social cohesion and behaviour.

We urge against a temporary moratorium on small homes, if by small homes the Committee means 1 and 2 bedroom homes. The number of households in London continues to increase, and to stop building homes for smaller households will only lengthen waiting lists and exacerbate the already severe lack of housing supply.

What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

London's population, demography, lifestyle trends and household compositions change more quickly and differently than in other big cities and other areas of the UK. Each of London's boroughs is diverse enough to contain a range of different housing typologies and socio-economic trends. Strategic market assessments would be a more effective method of gauging what the housing needs are in each location; whether these are likely to be delivered by the market; and what must be done by affordable housing providers to bridge the gap. Targets would then be set locally, rather than 42% being compulsory across all of London regardless of local trends.

The strategic assessments could either take place at local authority level or a larger level – nationally this would equate to the potential role of Local Enterprise Partnerships, but within London this would equate to the five London Housing Partnerships. Two different examples of target setting – by a London Housing Partnership and by a Local Authority – are below:

Example one: The East London Housing Partnership's last strategy for affordable housing building (which is currently being updated) operated a priority and percentage framework to advise on the homes needed across eight east London boroughs. For example, five and six bedroom homes (to house nine to ten people) were of the highest priority (level 1) but only 5% of new homes needed to be this size. One bedroom homes were of the lowest priority (level 4) but 20% of new homes needed to be this size. This strategy, which takes into account the proportion of homes needed alongside those which are less likely to be delivered and need planning priority.

Example two: Tower Hamlets Council carried out a Strategic Housing Market Assessment in 2009, and this report was used to determine housing need. The assessment explained the predicted shortfall of housing that is likely to occur in Tower Hamlets, based on demographic predictions and population needs. The report said that 80% of new homes should have 1 and 2 bedroom overall and 20% should be 3 and 4 bedroom homes. This is because, although family homes are needed, it is the small homes that are less likely to be provided by current stock turnover.

The RIBA is still considering this question in detail, and consulting members on what strategy should be managed by local authorities and what needs to be agreed at a larger than local scale. The two examples above are both adequate responses to market analysis and strategic development, whether this eventually takes place at a local or larger than local level.

Planning and Housing Committee; Overcrowding in London – Officer Response from London Borough of Richmond upon Thames

Thank you for the opportunity for Richmond upon Thames to respond to the Planning and Housing Committee's review of overcrowding affecting social housing tenants and the potential change of focus to shift housing strategy towards increasing the supply of bigger homes. Richmond upon Thames has identified a need for and supports the development of family sized social rented homes as part of its affordable housing development programme¹ and acknowledges the need to develop larger homes as one of a number of solutions to address overcrowding.

During the past year the Council has funded an overcrowding officer to visit housing association tenants who face overcrowding, providing information and helping to identify potential housing options such as mutual exchange, private rented and shared ownership opportunities. The Council has also funded tenants to buy space saving furniture to help ease overcrowding and operates a sponsored moves scheme to enable under occupiers to down size, freeing up larger properties. This work has been carried out working closely with Richmond Housing Partnership (RHP), the largest housing association in the borough who have also carried out a number of initiatives to help residents ease overcrowding in their homes. This includes adding partition walls to allow greater privacy and identifying a number of properties for extensions and loft conversions.

Please find our response to the Planning and Housing Committees enquires on overcrowding and questions regarding the shift to larger family sized homes below.

¹ Full details of our property size requirements for new affordable housing are outlined in the South West London Investment Framework which is available [here](#).

The most up to date information on the waiting list for social rented housing in terms of numbers and size of homes required.

As at August 2010 there were 7427 households on Richmond's Housing Register. By bed size this equates to 4206 households waiting for one bedroom or sheltered accommodation, 2309 for two bedroom properties, 942 for three bedroom properties and 240 for 4 bedroom plus sized properties. In 2009/10 there were 386 lettings so demand far outstrips supply for all property sizes. The needs of homeless families, those who are overcrowded and many of those in the most housing need is largely for family sized accommodation.

Estimates on the scale and nature of overcrowding in social rented housing in your borough

There are 453² housing association households who are overcrowded in the borough of which 98 are severely overcrowded (requiring 2 bedrooms or more). This breaks down into 190 households currently occupying 1 bedroom properties, 196 in two bedroom and 67 in 3 bedroom properties. Of the total 319 are tenants seeking transfer, 55 of whom are severely overcrowded.

The largest housing association in the borough Richmond Housing Partnership has 226 of the total number of overcrowded households on their transfer list, 36 of whom are severely overcrowded.

Details of the borough's housing allocation policies and priorities

The London Borough of Richmond has a points based housing allocations scheme, which is framed to give priority to those people who fall within the reasonable preference categories. Further priority is awarded to those people who qualify under more than one category. The categories are:

- People who are homeless or threatened with homelessness
- Those occupying insanitary, overcrowded housing or living in unsatisfactory housing
- People who need to move on medical or welfare grounds or grounds relating to a disability
- People who need to move to a particular locality, where failure to meet that need would cause hardship to themselves or others

The Housing Allocations Scheme also enables priority to be awarded to people who have been referred to us from various organisations. This includes ex-offenders, care leavers, people with alcohol and substance misuse problems and people with learning difficulties. The Scheme also considers the needs of those people in need of accommodation with additional support, which is aimed at the following groups:

- people with mental health problems
- people who have a learning disability
- care leavers
- young people

² Not counting out of borough applicants, homeless households in bed and breakfast or hostels

- elderly people with personal care needs
- ex-offenders and those with a history of substance misuse

It should be noted that we are currently revising our allocations scheme to further reflect the needs of overcrowded households in the borough.

Full current scheme details are available at
http://www.richmond.gov.uk/applying_for_housing.pdf

1) What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”

Increasing the supply of larger social rented family homes would play a significant part in helping to address overcrowding in the social rented sector. For boroughs like Richmond upon Thames with more limited land supply a wider range of initiatives is however required, such as extensions and de-conversions and under-occupation initiatives in order to effectively tackle overcrowding.

Developing larger units is generally supported but provision should be local as some (although not all) overcrowded households are reluctant to move to boroughs in the sub region where it may be easier/less costly to develop family sized homes. Factors such as having children in the borough's schools, existing local family and support networks as well as high quality amenities and green space mean that many overcrowded households want to remain in the borough.

2) What are the obstacles to increasing the supply of larger family homes?

For boroughs like Richmond upon Thames the availability of land, predominance of smaller sites and high existing use values are key constraints in developing larger family homes. There needs to be flexibility over grant rates with grant per unit rather than grant per person a key obstacle. Increasing the supply of larger units also has site implications such as around play space criteria. There is potential for housing management issues if new schemes are dominated by family units rather than containing a mix of bedroom size units.

With the move towards devolved delivery and as development of family sized units increasingly becoming uneconomical in central London there could be concern and resistance towards central London boroughs developing family sized affordable housing in cheaper peripheral boroughs. There needs to be co-operation between boroughs including a strategic understanding of the potential impact on services and infrastructure of developing family homes for households in housing need in more affordable areas of the Capital.

In terms of larger intermediate units there are key issues around affordability of larger family sized units especially in high land value boroughs such as Richmond. The housing aspirations of shared owners is likely to be similar to owner occupiers, requiring 3 bedroom houses with gardens rather than 3 bedroom flats. This again has implications for density and development costs.

3) The Mayor plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42% of new build social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce overcrowding in social housing.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

The 42% target is useful as a target but boroughs have to negotiate realistic outputs for larger units depending on funding levels. For boroughs with limited development opportunities the Mayor's Overcrowding Action Plan and focus on existing stock use such as extensions and de-conversion schemes and under-occupation initiatives are key elements in tackling overcrowding.

Richmond does not believe a temporary moratorium on the building of small homes would be the best mechanism for delivering family sized accommodation. In areas with high existing use values developers may want to build flats and a moratorium may simply make developers mothball sites until the moratorium is over. This could impact on the deliverability of affordable housing via Section 106 sites. Developers may also decide to diversify, building specialist accommodation such as older peoples or student accommodation rather than general housing.

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

Any increased focus on prioritising larger homes needs to balance potential impacts especially on the development of move on accommodation for supported housing which is particularly needed in London. There could potentially be impacts on the total number of households assisted, which would be reduced and in turn may increase numbers on the borough's housing register. Any increased focus on larger homes also needs to consider the economic activity of an area, where smaller intermediate units which contain single person or couple households (who are economically active) are of importance.



The London Assembly Planning and Housing Committee inquiry into Overcrowding in London

Citizens Advice submission August 2010

Citizens Advice welcomes the invitation to contribute to the London Assembly Planning and Housing Committee inquiry into Overcrowding in London. Citizens Advice bureaux are well aware of the detriment caused by overcrowding through advice work with Londoners in housing need.

However, Citizens Advice service is not involved in the supply-side of the housing market and, therefore, can not offer expertise directly relevant to the questions posed. We are happy to contribute in the insight gained through our advice work into the issue of overcrowding, and the broader policy context, which we hope will be useful background to this inquiry.

Citizens Advice bureaux in London

There are 30 Citizens Advice bureaux in London, each is an independent registered charity and a member of the national organisation, Citizens Advice. Citizens Advice bureaux in London operate from 66 high street premises and providing outreach services from a further 257 outlets.

London CAB give advice and information in a variety of ways: face-to-face, over the phone, via email and online through www.adviceguide.org.uk and individual bureau websites.

In 2009/10, the CAB service helped people with:

- 7.1 million problems across England & Wales, of these
- **622, 289 problems** were in London.

NB: Many clients are advised on multiple issues as their problems are dealt with holistically

Housing problems seen by London CAB

The high level of housing need experienced by Londoners is reflected by the proportion of CAB clients who seek advice about housing problems. In 2009/10, 10.5% of the problems (54, 832 problems) London CAB helped with related directly to housing – almost 4 percentage points more housing problems than the average in England and Wales of 6.6%.

In addition, problems of affordability are apparent in welfare benefit and debt advice work. Housing-related debts account for a larger proportion of all debt problems in London than the average across England & Wales (11.7%, compared to 9%) and problems relating to housing benefit are also

proportionally higher in London (14.8% of all benefit & tax credit problems in London, compared with 10.7% across England and Wales).

The types of tenure most associated with enquiries to CAB contrasts with the mix of tenure across London's housing stock overall. Private rented sector is the smallest type of housing tenure (20% of households in the capital¹), yet accounts for by far the largest proportion of enquiries to CAB (30.6% of all housing problems). Owner occupier property makes up 56% of London's households, but only 7.7% of enquiries to bureaux.

The private rented sector problems brought to bureaux generally relate to tenants' inability to enforce their rights in this relatively unregulated sector. Problems around on-going disrepair, tenancy deposits, letting agents practice, length of tenure, as well as a lack of affordability which can lead to overcrowding are all common. This has implications for the desirability of this tenure for many Londoners, heightening the importance of increasing the availability of suitable social rented accommodation.

Housing benefit cuts

The cuts to Housing benefit announced in the Emergency Budget 2010 will disproportionately affect larger households, particularly the first two cuts which will be introduced from April 2011. These will remove the five bedroom rate for Local Housing Allowance (LHA) and cap all LHA rates - the four-bedroom rate at £400 per week.

The average loss of these measures, combined with the reduction of LHA rates to the 30th percentile from October 2011, will create an average loss of £22 per week in London across all households. The DWP Impact Assessment shows larger households' housing benefit will reduce by greater amounts than those requiring smaller accommodation. London Councils figures estimates 2,648 households in four bedroom or larger properties will be negatively affected.

This will seriously affect the ability of low income households to secure affordable larger accommodation in the private rented sector. It will be vital the social rented sector is able to provide four bedroom or larger accommodation which is affordable for families on low incomes to avoid the overcrowding problems across London's housing market escalating.

¹ Housing in England 2006/07, CLG, September 2008.

Overcrowding in social rented accommodation

Citizens Advice bureaux assist Londoners living in overcrowded conditions in the social rented sector to seek more suitable accommodation. The lack of social rented housing affects CAB clients in all sizes of household.

Many CAB clients living in overcrowded situations are seeking properties with 3 bedrooms or less, and face significant delays in re-housing. For some, overcrowding has occurred when families grow or children become older.

A CAB client in inner London is living with his partner, adult son and teenage twins in a one bedroom social rented flat. He requested a transfer to larger accommodation almost 20 years ago, when his son was 10 years old, and again when his teenage twins were born. He has continued to bid for housing under the local authority scheme, but has not yet had an offer of more suitable accommodation.

A man in east London moved into a social rented studio flat when he was single. The client is now married with a baby and wishes to find larger accommodation. The flat is on the third floor of a converted house, with a steeply sloping ceiling. The CAB adviser calculated the one-room flat did not meet the space standard for a single person, let alone a family.

Other clients living with extended family in larger, but still overcrowded, properties wish to secure separate accommodation for their immediate family unit.

A young woman in north London lives in her mother-in-law's flat with her extended family. There are 18 people living in the 5 bedroom flat. The client's mother-in-law has terminal cancer and has developed significant care needs. Her sister-in-law has behavioural problems, which are exacerbated by the overcrowded conditions, making her act in a noisy and aggressive manner. The client had recently had a baby but was unable to breastfeed as her milk has dried up, she believes due to the stress of her living conditions. The client wished to move with her husband and child into separate accommodation, but did not have sufficient points to make realistic bids.

A man in south London is living with 9 people in a 3 bedroom social rented property. He has had a joint tenancy with his brothers for 10 years, and now lives with his wife and two children, his brother, his wife and two children and another brother. The client requested re-housing but has been told there are 260 people with more points on the list.

Sudden changes in circumstance also lead clients to seek separate accommodation.

A man in inner London had taken on permanent care of his three teenage children after their mother was sectioned under the Mental

Health Act. He is living with his own mother and two brothers in a 3 bedroom social rented property. There are now 7 people in the property. The client has applied for re-housing. He was told the wait for re-housing would be likely to be 1 or 2 years, despite having a letter requesting priority re-housing from the children's social worker.

For CAB clients in larger families finding suitable accommodation is particularly difficult. The lack of larger social rented homes is a problem also acknowledged by the local authority housing officers.

A man living in a 2 bedroom social rented flat with his wife and six children approached a south London CAB earlier this year. The client sleeps in the living room, and his son, now 10 years old, shares a bedroom with his mother and two sisters. Both the client and his wife suffer from depression. The family had been on the waiting list for a transfer to a more suitable property since 2001. On contacting the local authority, the CAB adviser was told the family would now be invited for interview to activate their application. The officer stated that the lack of larger homes discourages officers from inviting larger families for interview to avoid raising their expectations of a move in the near future.

A CAB client in east London lives in a 3 bedroom maisonette, with her husband and six children, four of whom are over 10 years of age. She has been referred to a hospital psychologist for depression, which she attributes to her housing situation, and is concerned her children's school work and behaviour is deteriorating due to the lack of space. The local authority accepted the family should be accommodated in a 5 bedroom property, but none are available.

From:
Sent: 02 September 2010 10:10
To: Michael Walker
Subject: Planning and Housing Committee: Overcrowding in London

Follow Up Flag: OSRH013
Flag Status: Blue

Attachments: NHH response on overcrowding.doc
Dear Michael,

In response to Andrew Boff's letter dated 21 July 2010, please find attached some notes on tackling overcrowding. I hope these are helpful to you.

Head of Regeneration

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LONDON ASSEMBLY – PLANNING AND HOUSING COMMITTEE OSRH013 NOTTING HILL HOUSING RESPONSE ON TACKLING OVERCROWDING IN LONDON

What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners”?

Simply increasing overall supply would not be effective. Consideration must be given to factors such as location and affordability. Location is of particular importance in the provision of larger family homes as proximity to existing social and domestic networks is likely to be an important consideration for potential tenants.

What are the obstacles to increasing the supply of larger family homes?

- Plot size, need for play space, need for individual amenity space – demand factors which impact on land value and act as a cost disincentive to the provision of larger family homes. This needs to be tackled through the planning system.
- Service charges, especially in city centre, high density locations – impact on the affordability of larger homes.
- HCA grant funding system which currently assesses value for money on a ‘per unit’ rather than a ‘per person’ basis – this favours the provision of smaller homes.

The Mayor has plans to tackle overcrowding in social rented housing by:

- *Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and*
- *Implementing the Mayor’s action plan to reduce social housing overcrowding*

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

As mentioned above, we would suggest that planning powers – applicable to all tenures, not just social rented housing – should be used to create a level playing field and increase the overall supply of family sized homes in the capital. Attracting families back into the inner city by providing homes of all tenures would help to drive improvements in education and social cohesion.

What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London’s housing needs?

Increased housing supply in the capital is responding to the growth in formation of small households – if less small homes are produced, demand for them will increase.

LONDON ASSEMBLY PLANNING AND HOUSING COMMITTEE OVERCROWDING IN LONDON -OSRH014

1.0 What are your views on the proposition that ‘increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding’?

- 1.1 The proposition is only partially correct. Whether increasing supply would ease overcrowding depends to an extent on the tenure of that new supply. We know that many households in the affordable rented sector and in the intermediate sector¹ are overcrowded. Substantial information is available on the needs of these households from housing association and local authority records and waiting lists. There may also be significant overcrowding in the private rented sector and in the private ownership sector, but we have less definitive information about these households.
- 1.2 So, simply increasing the supply of larger family homes is probably not enough. Overcrowded households in the affordable sector, whether in rented or intermediate housing, probably cannot afford the outright purchase of the larger homes they need. The average house price in London in 2009 was £363,043, 13.5 times the median London income of £26,910 and in 2009 first time buyers put down an average deposit of nearly £54,000 in London, equivalent to over two years' gross median earnings². Given figures like these it is easy to see that simply increasing the number of family homes available for outright purchase would not make any significant dent on overcrowding levels in social rented housing where around 60% of tenants are on some level of housing benefit.
- 1.3 So, what about increasing the supply of shared ownership family homes? It has proved difficult to make larger family homes for shared ownership, affordable. A larger home is a more expensive home, both in terms of the cost of land and build costs and even the purchase of a 25% share may be beyond the means of most or many. There are also obstacles to developing larger homes in these tenures (see section 2.0).
- 1.4 Housing associations are at the forefront of seeking solutions to the supply of family homes in all tenures. We understand that the LDA is seeking interest from housing associations for the delivery of three and four bed shared ownership homes, where the initial share purchased would be 25%. These homes will be targeted at overcrowded households currently living in social rented homes. This would release social rented homes for households on local authority waiting lists.
- 1.5 The economics of this sort of development are not without difficulty. We need to ensure that households purchasing small shares of high value homes are not over vulnerable to changes in economic circumstances. Housing associations undertaking these sorts of schemes will make a careful analysis of a household's ability to afford the total housing costs,

¹ By 'intermediate sector, we are referring to shared ownership tenures (part rent, part buy) and intermediate rented tenures, where rents are generally set at around 80% of market rent.

² Figures derived from Land Registry and from CLG data
apport

which will include mortgage, rent on the unsold portion of the homes, plus service charges.

- 1.6 So, we do need to increase the supply of larger family homes, but they need to be affordable to the range of households we know to be overcrowded. New larger family homes need to be available for social rent and for shared ownership or intermediate rent, at housing costs which reflect what households in need can reasonably afford.

2.0 What are the obstacles to increasing the supply of larger family homes?

- 2.1 The principal obstacle is cost; build cost and especially the cost of land. Other obstacles will include the availability of land and the suitability of that land for housing.

- 2.2 Most affordable housing needs some form of public subsidy. Because the Government places caps on the amount of rent which housing associations can charge for family homes, this has the effect of increasing the capital subsidy which is required for larger homes. Where capital subsidy is restricted or unavailable, there will inevitably be an impact on the number of family homes which can be built.

- 2.2 If homes and communities are to be sustainable, then we need to build homes in areas which are supported by the necessary social and physical infrastructure. Family housing will generate a higher child density than may exist in one and two bed flats in city centres. These will generally be predominantly occupied by young professional people, either as owner occupiers or as private renters. Their needs will be different to those of families. Children need schools and play facilities. We cannot build sustainable communities without the transport, amenities and other facilities which families need.

- 2.3 The calculation monitoring and reporting of the public subsidy cost of the grant per unit of affordable homes has been a major obstacle. Note that the LDA led scheme described in 1.4 analyses total grant per person, rather than per unit. This is an important step. Larger homes cost more, so for any given amount of subsidy, building smaller homes will give higher overall numbers.

3.0 The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedroom or more; and**
 - **Implementing the Mayor's action plan to reduce overcrowding in social housing**
- How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?**

- 3.1 The 42% target has been in operation for some time and is monitored by the HCA. In the 2008/11 programme to date, around 40% of allocations to

homes for affordable rent are to family sized homes. The supply of family homes for affordable rent has certainly increased following the introduction of targets by successive London Mayors. The contribution of local authorities in enforcing requirements for family homes has also been influential (in Hackney and Tower Hamlets for instance).

- 3.2 We need a combination of measures including practical measures to, (for example), encourage and incentivise under occupiers to move, freeing up homes for overcrowded households. The Mayor's action plan contains many good practice examples of initiatives which will help. It is a valuable publication and deserves to be widely read and used.
- 3.3 A temporary moratorium is likely to be entirely counterproductive. It risks driving private sector developers away and there are in any case, many national house builders that do not operate in London. We do not want to drive away those that do. Affordable family homes require a quantum of public subsidy which is higher than that required for smaller homes so it is likely that fewer affordable homes overall would be built for any given amount of public subsidy. This would have the effect of exacerbating the shortage of houses, driving up prices and making the problem even more acute.

4.0 What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

- 4.1 Prioritising greater numbers of publicly subsidised larger homes would result in a lack of subsidy to assist with meeting other needs. London needs a range of housing of different sizes, tenures and types. We need homes which can meet needs of those with physical disabilities; homes which are readily adaptable as household circumstances change; homes for elderly people who may no longer be able to maintain or afford the larger home which they have brought up a family in. These all have a priority relative to the need for larger homes. With finite public subsidy available, prioritising family homes could be at the expense of providing for other needs. We need to strike the right balance.
- 4.2 We need to make best use of the land which is available for development and this will not always be suitable for family housing. Land with a small footprint will not necessarily lend itself to family homes, which should, ideally, have ground floor access and private open space such as a garden or terrace. Some parcels of land may lend themselves to maximising the number of smaller homes which can be provided, for example, for a particular special needs client group, or smaller homes for elders. Some land may be best utilised as a mixed development, or solely for retail or commercial purposes.
- 4.3 Prioritising family homes could conceivably lead to community tensions if other competing needs are perceived to be less important.
- 4.4 However, the Financial Times on 27th August 2010 reported that housing developers in London were increasingly abandoning plans to build flatted developments, in favour of switching to the development of family sized homes. The developers are responding to a situation where the number of

first time buyers, usually be the main market for flats, has fallen to its lowest level for some time. Buy to let investors, the other substantial market for flats, have also left the market in droves. Both they and first time buyers have been hit by the lack of mortgage finance and by banks' requirements for substantial deposits. There is a chance then, that our current economic difficulties may mean more, rather than fewer, family homes. This will not though, solve the problem of affordability and so is unlikely to make a significant dent on levels of overcrowding.

I have attached the most recent information on our waiting list as requested (18082010)"QUTJ 237

I have also attached details of those overcrowded families in social rented accommodation within LBWF (1st quarter) and the LBWF Allocations policy.(housing allocations)

Additionally you have asked for our views on a number of questions :

1/ the proposition that "increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding".

Essentially any increase in the provision of larger sized accommodation will improve the circumstances of those currently living in overcrowded accommodation. However, if we are talking about social housing then this will never be the solution to all overcrowding as it would be virtually impossible to build to meet demand, especially under the current difficult market / financial circumstances.

2/ Obstacles to increasing the supply of larger family homes : This question appears to be duplicated in the appendix so please refer to the answer provided in the attached appendix (borough questions)

3/ The introduction of a target of 42 % of new social rented at 3 beds or more is to be commended and will of course increase supply.

I assume that the implementation of the mayors plan to reduce social housing is in fact the action plan to reduce overcrowding.

The overcrowding reduction plan is mainly a list of actions that are, from our own perspective here at LBWF, already being carried out. There is little if anything that is beyond our current targets and in some cases our targets are over and above those within the plan.

It is difficult to gauge the comparative impact of the above measures when assessed against the example of a temporary moratorium on building smaller units. In the borough questions appendix we address the issues related to grant and the fact that rental income does not meet the increased cost of borrowing to build the larger units. Therefore a moratorium would only work if grant rates were increased.

The main problem I can see in respect of overcrowding is the changes to HB regulations that are coming forward and the scrapping of the 5 bed LHA rate for example that is likely to increase overcrowding or the other changes to LHA HB rates that will encourage people to move out of the centre of London to cheaper areas such as LBWF where they will be in higher competition with other families and other local authorities seeking temporary accommodation.

I trust that this is helpful. Please let me know if we can be of further assistance

Regards

Appendix – supplementary questions on overcrowding in London’s social rented housing

Challenges to increasing supply

- What are the issues surrounding house building economics on increasing the supply of larger family homes?

The cost of acquiring land and building larger affordable homes compared to smaller ones is not offset with a proportionate increase in the rental income stream.

The rental income stream from a larger family sized unit simply does not cover the additional cost to a Registered Provider (RP) of acquisition, build and the cost of borrowing. It is also not reflective of the actual increase in market value between the two property types.

In the past these greater costs for the provision of larger affordable homes, and the disproportionate increase in the rental stream was recognised by the HCA in the grant rates awarded. The HCA’s new policy of assessing the vfm of grant applications on a per property basis, rather than the previous method of a per person basis, has exacerbated the problem. This policy makes the building of larger affordable rented homes almost impossible for RPs.

For example, a RP may get £80k grant for building a one bedroom flat, and £80k grant for building a 4 bedroom house. This policy is actively encouraging RPs to produce smaller units as they produce a greater return.

Previously grant awards of, say, £30,000 per person meant that a 1bed 2 person flat attracted £60k grant whilst a 3 bed 5 person house attracted £150,000. This encouraged RPs to build larger family housing units. This is no longer the case.

- What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Reduced grant funding availability is likely to see an increase in intermediate products in scheme proposals in order to ensure scheme viability. We are anticipating seeing schemes coming forward with significantly lower percentages of social rented housing and more smaller social rented units. This is contrary to our housing strategy requirements which stipulate that 60% of new social rented homes need to be 3 bed plus.

In addition, due to the lack of availability of mortgage finance, it is increasingly difficult for potential shared owners, who usually have little or no savings for deposit, to get access to mortgages, increasing the risks to the RP of providing shared ownership products. We therefore anticipate seeing more intermediate rent and rent to homebuy products in scheme proposals.

Mayor’s approach:

- To what extent can the Mayor’s investment plans be altered to increase the proportion of family sized homes?

The Mayor could prioritise the grant that is available for schemes which deliver larger family units.

Direct telephone: 020 7983 6542; **Fax:** 020 7983 4437; **Email:** michael.walker@london.gov.uk

- What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

A rent regime could be introduced whereby rents charged can increase to reflect increases in household income. Assumptions on increases, (similar to staircasing assumptions for shared ownership products), could be factored in at scheme appraisal stage to increase scheme viability and therefore enable the number of larger family social rented units to be increased.

Other measures for increasing supply:

Other measures for increasing supply:

- How can variable housing grant rates encourage the provision of more family housing?

We would support the evaluation of grant applications on a per person basis to encourage RPs to build larger homes for social rent.

- What other ways are there to increase the supply of larger family homes?

Space and environmental standards could be linked to a sliding scale of grant to encourage the construction of larger family size, environmentally efficient social rented homes.

Local authorities could dispose of land at less than market consideration to support schemes which deliver higher percentages of affordable housing.

If there is any additionality over the base level of affordable housing requirements, Local Authorities could reduce other s106 contribution requirements. However, this is likely to be difficult as larger units will cause greatest impact in terms of health and education contribution requirements.

- What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

Developers will naturally push for reduced s106 contributions to support affordable housing levels, please see comments above.

Lower percentages of affordable housing units within schemes could be delivered by the market as long as the units which are provided are all family units.

The Private Sector Rental initiative could also assist in the delivery of affordable housing units.

BREAKDOWN OF CASES ON HOUSING REGISTER - 18/08/2010

	1 BEDS & STUDIOS	2 BEDS	3 BEDS	4 BEDS	5 BEDS	6 BEDS	7 BEDS	8 BEDS	12 BEDS	TOTAL REQ 4 OR MORE	UNDER ASSESS-MENT	TOTAL ALL SIZES
HPU PERM	37	436	264	98	28	9	2		0	137	0	874
WAITING LIST	6254	4153	1804	520	171	38	17	3	1	750	59	13020
TRANSFERS	466	619	486	179	79	19	6	3	0	286	3	1860
TOTALS	6757	5208	2554	797	278	66	25	6	1	1173	62	15754

Local Authority

Waltham Forest

Total LA stock

10406

Total RSL stock

11,612

Total number of transfers registered as at 01/04/2010:

2051

1

Number of home visits

Number of Downsizees

of which are underoccupiers

Number of Overcrowded households

of which are severely overcrowded

2

Information on Allocations

Does your data reflect counts using the bedroom standard

Yes

If not, then please indicate the following:

Age at which children of different sex are separated

Age at which children of the same sex are separated?

3a

Total number of transfers registered:

Total number of Downsizees

of which are underoccupiers

Start position, 01/04/10

Occupying 2 beds

Occupying 3 beds

Occupying 4 beds

Occupying 5+ beds

3b

New Cases

Quarter 1

Quarter 2

Quarter 3

Quarter 4

TOTAL

Adjustment

3c

Rehoused

Total rehoused

Releasing 2 beds

Releasing 3 beds

Releasing 4 beds

Releasing 5+ beds

Total registered

Final position, 31/03/11

Occupying 2 beds

Occupying 3 beds

Occupying 4 beds

Occupying 5+ beds

4a

Total registered

Start position, 01/04/10

Occupying studio and 1 bed

Occupying 2 beds

Occupying 3 beds

Occupying 4 beds

Occupying 5+ beds

4b

New Cases

4c

Rehoused - Social Housing

4d

Rehoused - Private Sector Housing

5

Non-social tenants

Total approaches to Housing Options

Total assists into PRS

Total allocations to SRS

7

For the purposes of this data form, a 'downsizer' is counted as anyone who registers to move to a smaller property.

An 'underoccupier' is counted only if the household occupies a property 2 or more bedrooms in excess of their requirement.

Use this field to indicate any other changes to the totals (-/+):

These totals calculate automatically. Use the Adjustment field if you need to change the totals.

Use this field to indicate any other changes to the totals (-/+):

These totals calculate automatically. Use the Adjustment field if you need to change the totals.

Use this field to indicate any other changes to the totals (-/+):

These totals calculate automatically. Use the Adjustment field if you need to change the totals.

Overcrowding and severe overcrowding in Social Stock

Overcrowding and severe overcrowding in Non-Social Stock

119

London Borough of Waltham Forest

Housing Allocation Scheme

Version 1d 14.7.2009

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A. General Information

This Allocation Scheme outlines the policies and procedures relating to the allocation of social housing. Within Waltham Forest there is a high demand but very limited supply of social housing. For example, the number of empty properties available to let by the Council fell by 25% between 2002/3 and 2005/6.

A leaflet entitled “Housing Allocation Scheme – General Information” summarises the information given in this document and is available on the Council’s website www.walthamforest.gov.uk in Council offices or on request from the Registration Section.

Because the Council cannot offer social housing to most of those who seek it, applicants may like to consider:

- Low cost home ownership
- An exchange (there is a scheme that applies to Council and housing association tenants)
- Renting in the private sector
- Moving to other parts of the country where there is a better balance between the supply and demand of social housing

Assistance and further information about the Allocation Scheme can be obtained from:

The Housing Registration Team
Housing and Neighbourhood Services
Cedar Wood House
2D Fulbourne Road
London E17 4GG

E-mail Housing.Registration@walthamforest.gov.uk

Phone 020 8496 3000

B. Aims of the Scheme

- To meet statutory duties when allocating housing.
- To give applicants more choice over whether they are housed and if so how.
- To match housing need with housing availability.
- To reduce void times.

C. How to Apply

An applicant needs to complete a Housing Application form and return it to The Housing Registration Team (see address above). Once the Council receives a form it will assess eligibility and determine level of priority. An application form can be obtained by:

- Telephoning the Housing Registration Team
- Collecting one from any of the main Council offices
- Downloading one from www.walthamforest.gov.uk
- Emailing Registration.Team@walthamforest.gov.uk

D. Who is Eligible

Subject to the following exceptions a person aged 16 or over is eligible for social housing allocated by the Council. However, eligibility is no guarantee that an allocation will be made.

Immigration status

The Housing Act 1996 renders certain people ineligible due to their immigration status.

Unacceptable behaviour

The Council may decide that an applicant is ineligible if it is satisfied that:

- S/he, or a member of his/her household, has been guilty of unacceptable behaviour (such as non-payment of rent or causing a nuisance or annoyance) serious enough to make him/her unsuitable to be a tenant of the Council, and
- In the circumstances at the time his/her application is considered, s/he is unsuitable to be a tenant of the Council by reason of that behaviour.

E. How Needs are Assessed

Eligible applicants are placed into one of three levels of priority in accordance with the criteria set out below:

- Additional preference
- Reasonable preference
- No preference

The Council may treat an applicant as having no preference if s/he has sufficient financial resources to enable him/her to secure his/her own accommodation.

The priority of a new applicant is assessed according to the following criteria.

Additional Preference Plus

An applicant who has been awarded additional preference on two separate grounds as detailed below.

Additional Preference

An applicant has an additional preference if s/he is in one or more of the following categories:

Homelessness

1. The Council is discharging the full housing duty under s193(2) of the Housing Act 1996 by securing accommodation that is not self-contained (such as bed and breakfast, licensed or hostel accommodation).
2. The Council is discharging the full housing duty under s193(2) of the Housing Act 1996 and the lease on the secured accommodation has expired or the landlord wishes to dispose of his/her property.

Medical, social and welfare

3. A Council Panel decides that the wellbeing of the applicant or a member of his/her household is being seriously damaged or threatened to the extent that s/he needs to be rehoused urgently. Applicants from outside the Borough, other than existing Waltham Forest tenants in out-borough estates, will need to be presented to the Social Needs / Disability Panel for agreement that they not only have an urgent need but that they need to be rehoused in this Borough to have that need resolved.
4. The applicant is nominated to the Council under the Move-On scheme by an organisation from an agreed list of organisations managing supported schemes for single people and s/he is ready to move into independent general needs accommodation.
5. The applicant is approved by Children's Services as eligible for a nomination under the Foster Care Quota.
6. The applicant is a person leaving Local Authority care who in the opinion of 16+ Services is capable of maintaining an independent lifestyle.
7. The Council's Sheltered Housing Panel decides that an applicant needs accommodation with support (including sheltered and extra care scheme accommodation) on the grounds of disability, age and/or social isolation.
8. The applicant is a retiring Council caretaker in tied accommodation (i.e. Housing, Social Services and Education) and has retired on grounds of old age or ill health.

Management

9. The Council urgently needs possession of the applicant's property (such as the need to decant, redevelop, rehabilitate, refurbish, repair or demolish a property).

10. The applicant occupies:

- a) Council accommodation that is more extensive than is reasonably required by his/her household,
- b) Housing Association accommodation that is more extensive than is reasonably required by his/her household and the Council has the right to nominate a person to occupy the vacancy, or
- c) Council or Housing Association accommodation specifically adapted for wheelchair use and no member of the applicant's household has such a need. In the case of Housing Association accommodation, this applies where the Council will have been given the right to nominate a person to be a tenant of the property that the applicant vacates.

11. The applicant has succeeded to a Council tenancy but under-occupies the property in comparison to his/her assessed need.

Other

12. The applicant has, in the opinion of the Head of Housing an urgent need to be rehoused.

13. The applicant was a long-term carer for a Council tenant who has now died or moved to supported accommodation and the carer has no automatic right to succeed to the tenancy.

Time Limits for Bidding with Additional Preference or Additional Preference Plus Status

Additional preference may be limited for a period of either 3 or 12 months as set out below. At the end of that period an applicant loses his/her additional preference and will acquire either reasonable or no preference according to his/her circumstances. At any time, as is explained below, the Council may make a direct offer to an applicant.

Additional preference category	3 months	12 months unless the Provision and Choice Unit or a Panel reduces or extends this period
1. Full housing duty (not self-contained)	✓	

2. Full housing duty (lease expiring)	✓	
3. Council Panel		✓
4. Move-On scheme	✓	
5. Foster care quota		✓
6. Leaving Care	✓	
7. Sheltered Housing (excluding extra care)		✓
8. Retiring caretaker	✓	
9. Urgent Council need (decant etc)		✓
10. Under-occupation		✓
11. Succession to Council tenancy	✓	
12. Head of Housing and Neighbourhoods decisions	✓	
13. Approved Carers of Council tenants agreed by Social Need Panel	✓	
14 Additional Preference Plus		12 months from date of most recent Panel decision to award additional preference

An applicant who has an additional preference need for purpose built or wheelchair adapted property will normally retain his/her additional preference status indefinitely unless the Provision & Choice Unit or a Panel decides that reasonable offers have been refused.

At the end of the 12 month additional preference period an applicant may request that the bidding period be extended but would need to show that they have made reasonable efforts to apply for vacancies that have been advertised and have not been successful. If an applicant has restricted their bids in any way e.g. only bidding for certain areas when vacancies were available elsewhere, the Council reserve the right to refuse such requests. Requests will be referred to the officer or Panel responsible for having granted

the original priority. Priority may be reset for a further 12 months or extended for a limited period only at the discretion of the Council.

Reasonable Preference – residents in Waltham Forest

Waltham Forest tenants in out-borough properties and homeless households for whom we have accepted a duty and temporarily rehoused outside the Borough are treated as residents in Waltham Forest.

An applicant will have a reasonable preference if s/he is in one or more of the following categories. For each category the applicant is awarded 1 or 3 reasonable preference points. Where the applicant is in more than one category his or her points are cumulative.

Homelessness

1. The Council is discharging the full housing duty under s193(2) of the Housing Act 1996 by securing accommodation that is not self-contained (such as bed and breakfast, licensed or hostel accommodation) and the applicant's Additional Preference category has expired due to passage of time. (1 point)
2. The applicant is occupying accommodation that was offered as a qualifying assured shorthold tenancy under s193(7B) of the Housing Act 1996. (3 points)
3. The applicant has accepted accommodation through the Council's Rent Deposit or Self Help Scheme. (3 points)
4. The applicant is homeless, within the meaning of Part 7 of the Housing Act 1996. (1 point)
5. The applicant is:
 - a) owed any of the following duties under Part 7 of the Housing Act 1996:
 - s190(2) intentionally homeless with priority need,
 - s193(2) full housing duty,
 - s195(2) priority need and unintentionally threatened with homelessness, or
 - b) Occupying accommodation secured by an authority under s192(3) of the Housing Act 1996 – power to secure accommodation for those without a priority need who are not homeless intentionally. (1 point)

Medical, social and welfare

6. A Council Panel has decided that the health or wellbeing of the applicant or a member of his/her household is being significantly damaged or threatened to the extent that it is desirable for him/her to be rehoused on

a non-urgent basis. A Panel will award (3 points) for each circumstance that causes a person to satisfy these criteria (for example an applicant may receive 3 points on account of risk to health from the location of the property and 3 points on account of harassment from neighbours). A Panel may also award 3 points in respect of each person in the household who satisfies these criteria.

7. The Council's Sheltered Housing Panel has decided that the health or wellbeing of the applicant or a member of his/her household is being significantly damaged or threatened to the extent that it is desirable for him/her to be rehoused into sheltered housing on a non-urgent basis. (3 points)

Insanitary or overcrowded conditions

8. The applicant is:
not living in self contained accommodation (3 points), or living in accommodation that is overcrowded in comparison to the Council's size rules set out in Appendix 1 (3 points for each extra bedroom required).
9. The Council's Social Need Panel has decided that the applicant is occupying insanitary or unsatisfactory housing conditions that pose an ongoing and significant threat to health or wellbeing of the applicant or a member of his/her household. (3 points)
 - With private sector accommodation the Panel will have regard to any notice served by its Environmental Health Service and any remedial action that could be taken by the applicant or otherwise to make the property sanitary and satisfactory.
 - With Council accommodation the Panel will have regard to a report from one of its surveyors and any remedial action that could be taken by the applicant or otherwise to make the property sanitary and satisfactory.

Need to move to a particular locality

10. The applicant needs to move to a particular locality within Waltham Forest and a failure to meet that need would cause hardship to the applicant or others. (1 point)

Reasonable Preference – residents not in Waltham Forest

For applicants who do not reside in either Waltham Forest or a Waltham Forest out-borough property the criteria that are set out above for obtaining reasonable preference points apply save that each award of reasonable preference points is limited to 1 point as compared to a resident from Waltham Forest who could get up to 3 points for each award.

No Preference

An applicant will not be awarded any preference if s/he does not have a reasonable or additional preference.

F. Reviewing the Register

Once an applicant's housing need has been assessed his/her name is entered on the register. The Council may review an applicant's housing need at any time.

Unless there are exceptional circumstances an applicant will be removed from the register if:

- S/he does not respond to a request for information within 21 days of a written request being sent to the applicant, or
- S/he has changed his/her address without telling the Council within 12 weeks of the change.

Removal from the register will, in the absence of exceptional circumstances, result in the loss of any previously awarded priority and accumulated time waiting on the register if the applicant re-applies.

G. Allocations

Property Size

The size of property an applicant can bid for or be allocated is, with certain exceptions, based on the number of people in the household and their relationship to each other. The relevant rules are listed in Appendix 1.

Allocating Properties

Apart from properties where bidding is restricted or which are allocated by a direct offer, properties are generally allocated as follows:

- 1) A bidder with additional preference plus has priority over any other bidder. If there is more than one bidder with additional preference plus, priority is given to the bidder who has had the status longest.
- 2) If there is no bidder with additional preference plus, then the property is allocated to a bidder with additional preference. If there is more than one bidder with additional preference, priority is given to the bidder who has had the status longest.
- 3) If there is no bidder with additional preference, then the property is allocated to a bidder with reasonable preference.
 - a) If there is more than one bidder with reasonable preference, priority is given to the bidder with the most reasonable preference points.

- a) If there is more than one bidder with the most reasonable preference points, priority is given to the bidder who has had that number of points longest.
- b) If there is more than one bidder with the most reasonable preference points longest, priority is given to the bidder who has been on the register longest.

Some advertised properties are subject to multiple viewings whereby up to five applicants will be invited to view the property at the same time. This is done to speed up the allocation process.

The bidding process and ranking of submitted bids is explained more fully in a separate leaflet entitled “Choice Based Lettings – How to Bid”.

Restricted Bidding

With new build and ground floor properties the Council may limit bidding:

- To existing Council tenants under-occupying their present homes, or
- To applicants with mobility difficulties.

Direct Offers

In the following circumstances allocations are not made on the basis of bids because the Council may make a direct offer of a particular property to an applicant. This may happen where:

Homelessness

1. The Council is discharging the full housing duty under s193(2) of the Housing Act 1996 and the applicant has not secured accommodation within three months of bidding. A direct offer may be made before the end of any bidding period.

Medical, social and welfare

2. An applicant has particular support needs.
3. An applicant needs supported accommodation and is in temporary accommodation designed to encourage and develop living skills. In these circumstances the applicant may not bid.
4. An applicant is leaving care and s/he has not secured accommodation within three-months of acquiring that status.

5. The applicant has additional preference on account of the Move-On scheme and s/he has not secured accommodation within three-months of acquiring that status.
6. A property has particular features to meet specific needs, such as those built or adapted for wheelchair access. For these properties the Council will make a direct offer having particular regard to:
 - a) The applicant's needs.
 - b) The suitability of the property for those needs.
 - c) Whether the applicant is owed the full duty under s193 of the Housing Act 1996.
 - d) Whether the applicant cannot be discharged from hospital for want of suitable accommodation.
 - e) Whether the applicant has any additional preference and if so how long s/he has had it.
7. The applicant is a retiring Council caretaker (i.e. Housing, Social Services and Education) and has retired on grounds of old age or ill health and s/he has not secured accommodation within three-months of acquiring that status.
8. Carers' cases, after the three-month bidding period has expired.

Management

9. An applicant succeeds to a property that is too large for him/her but refuses to bid for smaller accommodation.
10. Offers made at the Council's own instigation where there are exceptional circumstances such as where it is necessary to urgently decant the occupiers of a property or a tenant needing to move urgently on management grounds such as fleeing violence.
11. In order to fulfil any other unspecified fiduciary or Housing Management duties

Sole/Joint Tenancies

If a couple specify that they are applying jointly, we will offer a joint tenancy. If not specified but where there are children in the household who are the offspring of both adults, the tenancy will ordinarily be offered as a joint tenancy.

If a household do not specify in their application that they want a joint tenancy we will offer a sole tenancy to the first applicant but offer the choice of a joint tenancy.

Where priority for a successful application has been achieved by another adult member of the household (over 16) being awarded priority e.g. via one of the Council's Panels, that person will be included as a joint tenant.

Similarly, if a three generation household apply as homeless and priority is achieved because of the presence of a child, the child's parent(s) will be included as one of the joint tenants.

If a household with joint tenants later requests that they be offered separate tenancies, such requests will be considered but only agreed at the discretion of the Council. If agreed the Council retain the right to ask the smaller household to move elsewhere if the larger family unit better suits the size of the property. Such decisions will be made by the Team Leader Allocations, Choice & Mobility or the Group Manager Allocations and Registration and in exceptional circumstances by the Social Need Panel.

After the original creation of the tenancy, requests to add a new joint tenant will be considered but will only be agreed in exceptional circumstances.

Cross Borough Bidding

There are a number of cross-borough schemes operating in London to facilitate mobility into and out of Waltham Forest. Moves and the exchange of properties between the various landlords are monitored to maintain an equal balance between the number of applicants moving into an area and those moving out.

Useful Transfer Payments

The Council wants to encourage tenants to move to smaller accommodation if some of their household have move away and they no longer fully utilise all the bedrooms. If a tenant moves to a smaller property through a move facilitated by the Housing Service, the Council will make them a useful transfer payment after they have moved. This is paid by way of a cheque but if there are rent arrears outstanding the payment will be made into their rent account.

The Council will pay £1000 for the first bedroom released, £500 for each subsequent rooms and a further £1000 for a fourth bedroom. £3000 will be the maximum payment.

In addition, the Council will pay for removal costs but only if they are organised by the Council's approved contractor

A further £50 will be paid toward disconnection and reconnection charges for electricity, gas, phones etc.

This payment does not apply when the move has been by way of a mutual exchange.

Succession to a Council Tenancy

When a Council tenant dies, it may be possible for a husband/ wife/ civil partner, or other family member to take over the tenancy. This is known as succession.

Succession can only occur following the death of the tenant. If the deceased person was a joint tenant, the only person who may be able to succeed the tenancy would be the remaining joint tenant.

A succession can only happen once. This means that if the deceased person was a successor (including a previous joint tenant), there cannot be a succession by another family member.

The Council's policy on succession reflects the legal position and the rights of successors as laid out in the Housing Act 1985. Further information regarding succession can be found in the Council's leaflet titled "Tenancy Succession – A guide for Council tenants and their families".

H DECISION TAKING

The following table shows who takes what decisions:

Eligibility for an offer	Registration Team
Priority status on Housing Register	Registration Team
Exceptions to arrears policy	Social Need Panel
Appeals against deletion from register	Group Manager Allocations and Registrations
Urgent need to be rehoused	Head of Housing
Move-On quota	Team Leader Allocations Choice and Mobility
Social Need Panel Decision	Panel consists of:- Group Manager Allocations and Registrations Principal Officer Social Services Mental Health & Housing Linkworker (or Representative) from North East London Mental Health Trust In urgent circumstances decisions

	can be made by the Panel Chairperson only but that decision will be referred to the next full Panel for ratification
Sheltered Housing Panel	<p>Panel consists of:-</p> <p>Unit Head Supporting People</p> <p>Unit Manager Sheltered Housing</p> <p>Group Manager Older Peoples Services</p> <p>Senior Occupational Therapist</p> <p>In urgent circumstances decisions can be made by the Panel Chairperson only but that decision will be referred to the next full Panel for ratification</p>
Disability Panel	<p>Panel consists of:-</p> <p>Senior Medical Adviser</p> <p>Housing Disability Adviser</p> <p>Senior Occupational Therapist</p> <p>In urgent circumstances decisions can be made by one Panel member only but that decision will be referred to the next full Panel for ratification</p>
Reviews and appeals against the suitability of offers. The Review and Appeals Officer acts as and independent arbiter of the suitability of offers and may, where they feel it appropriate make the decision themselves or refer aspects of a review to a Council Panel for further opinion.	Reviews and Appeals Officer
Requests to add additional family members to an application without losing time waiting priority.	Social Need or Disability Panel
Succession to a Council tenancy - Whether applicant meets statutory requirements	Team Leader Allocations Choice and Mobility and Group Manager Allocations and Registrations
Reviews of Panel Decisions	The review will be considered by the next full Panel. If the original decision is upheld, the applicant will be

	advised to consider pursuing the matter through the Council's Complaints Process. The complaints process will only review the administration process or adherence to procedures and/or policy etc and will not consider or comment on the panel or officers' decision.
Reviews of Officers Decisions	The review will be considered by an officer senior to the officer who made the original decision. If the original decision is upheld, the applicant will be advised to consider pursuing the matter through the Council's Complaints Process. The complaints process will only review the administration process or adherence to procedures and/or policy etc and will not consider or comment on the panel or officers' decision.
Variations to bidding periods in exceptional circumstances	Unit Head Housing Provision & Choice Group Manager Allocations and Registrations Relevant Panel

I. Information

An applicant has the right to:

1. Request such general information as will enable him/her to assess:
 - a) How his/her application is likely to be treated under the scheme (including in particular whether she/he is likely to be regarded as given an additional or reasonable preference); and
 - b) Whether housing accommodation appropriate to his/her needs is likely to be made available to him/her and, if so, how long it is likely to be before such accommodation becomes available to him/her.
2. Be notified in writing of any decision, with reasons, that s/he is a person who is not suitable to be a tenant of the Council on grounds of unacceptable behaviour as set out in s167(2C) of the Housing Act 1996.
3. Request the Council to inform him/her of any decision about the facts of his/her case which is likely to be or has been taken into account in considering whether to allocation accommodation to him/her.

J. Review s

For the following decisions an applicant has the right to be informed of the decision and of the grounds for it and to request a review of it, namely a decision:

- That the applicant is not suitable to be a tenant of the Council on grounds of unacceptable behaviour as set out in s167(2C) of the Housing Act 1996.
- About the facts of his/her case which is likely to be, or has been, taken into account in considering whether to allocate housing accommodation to him/her.
- That the applicant is ineligible for an allocation by virtue of:
 - His/her immigration status, as provided by s160A(3) of the Housing Act 1996, or
 - His/her unacceptable behaviour (such as rent arrears or causing a nuisance or annoyance to neighbours), as provided for by s160A(7) of the Housing Act 1996.

A review can be requested in writing or by telephone and when made the Council will notify the applicant:

- that s/he or somebody acting on his/her behalf may make written representations in connection with the review, and
- Of the procedure to be followed in connection with the review (if it has not already done so).

The Council will notify the applicant of the review decision within 8 weeks from the day on which the request is made to the Council, or such longer period as the Council and the applicant may agree in writing.

The review decision will be made by a Council Officer who was not involved in the original decision and who is senior to the officer who made the original decision unless made by a Panel. In the case of a Panel's decision a review is conducted by the Panel making the original decision.

Appendix 1: Allocation Property Size Rules

- A single parent household is eligible for the property size that a two-parent household (with the same number of children) would be eligible for:-
- An unborn child does not count as part of an applicant's household and after birth s/he will only count when the Council has seen the full birth certificate.
- Two children under the age of 8 are expected to share a bedroom regardless of their sex.

- Two children under the age of 16 are expected to share the same bedroom if they are of the same sex.
- The Council will disregard, save in exceptional circumstances, the existence and needs of any family member of the applicant who either:
 - needs leave to enter or remain in the UK but does not have it, or
 - has leave to enter or remain in the UK subject to a condition that s/he will not have recourse to public funds.

The table below shows examples of the size of properties that households may require. A reference to a couple means people who live together as part of the same household whether they are married, cohabiting, have entered in a civil partnership or are gay or lesbian.

Household Composition	Assessed Property Size
Single applicant (including a pregnant woman)	Studio or 1 bed
Single applicant (aged 50 years +)	Studio or 1 bed (including sheltered accommodation)
Couple (including a pregnant woman)	1 bed
Couple (aged 50 years +)	1 bed (including sheltered accommodation)
2 adults living together (not cohabiting)	2 Bed
Single applicant or couple with 1 child (of any age)	2 bed
Single applicant or couple with 2 children (mixed sexes, both under the age of 8)	2 bed
Single applicant or couple with 2 children (same sex, both under 16)	2 bed
Single applicant or couple with 2 children (mixed sexes, one under the age of 8 and one aged 8 or over)	3 bed
Single applicant or couple with 2 children (same sex, one under the age of 16 and one aged 16 or over)	3 bed
Single applicant or couple with 3 children (mixed sexes, all under the age of 8)	3 bed
Single applicant or couple with 3 children (same sex, all under the age of 16)	3 bed
Single applicant or couple with 3 children (mixed sexes, all under the age of 16)	3 bed

Single applicant or couple with 3 children (same sex, two under age of 16 and one aged over 16)	3 bed
Single applicant or couple with 3 children (same sex, one under the age of 16 and two aged 16 or over)	4 bed
Single applicant or couple with 3 children (same sex, all 16 or over)	4 bed
Single applicant or couple with 3 children (mixed sexes, all aged 16 or over)	4 bed
Single applicant or couple with 3 children (one aged over 16 and two mixed sexes, one under the age of 8 & one aged 8 or over)	4 bed
Single applicant or couple with 4 children (same sex, all under the age of 16)	3 bed
Single applicant or couple with 4 children (mixed sexes, all under the age of 8)	3 bed
Single applicant or couple with 4 children (two of 1 sex and 2 of the other sex, all under the age of 16)	3 bed
Single applicant or couple with 4 children (same sex, three under the age of 16 and 1 aged 16 or over)	4 bed
Single applicant or couple with 4 children (three same sex under the age of 8 and one opposite sex aged 8 or over)	4 bed
Single applicant or couple with 4 children (3 mixed sex under the age of 8 and one of any sex aged 16 or over)	4 bed
<p>This table is not exhaustive. The assessed property size for households with larger families than those illustrated is based on the following:-</p> <p>1 bedroom for each additional person aged 16 or over</p> <p>1 bedroom for each additional 1 or 2 children (same sex, both under the age of 16)</p> <p>1 bedroom for each additional 2 children (mixed sexes, both under the age of 8)</p>	

Exceptions

The Council may make an exception to the normal criteria set out above if:

1. A Council Panel authorises an increased size on disability, medical or social grounds. This power enables the Council to consider, for example, any specific needs of a child or adult or any need for a live-in carer.

2. The bid is for a Housing Association or local authority property (via the cross borough bidding scheme) that operates different size criteria. For example, most associations will not allow a pregnant woman to accept a one bedroom flat that would become overcrowded when the child is born. Some associations will not allow two children of the same sex to share a bedroom if they are more than a certain number of years apart in age.
3. A Council Panel authorises a 'like for like' move. This may happen where a household in need of a transfer is unlikely to be able to secure a property of appropriate size quickly enough. For example, an overcrowded household may be better off moving to a property with the same number of bedrooms if the property meets a need. Where such an allocation is accepted the applicant will retain his/her waiting time for a larger property and carry it forward to the new address.
4. The Council authorise a larger property for a person with additional preference on grounds of:
 - Under occupation (category 4) in order to release an even larger property, or
 - Urgent Council need (category 3) in order to enable the transfer to proceed expeditiously.
5. The Council authorises a direct offer of accommodation smaller than the assessed size to homeless applicants in order to minimize the cost to the Council of providing temporary accommodation and in order to make best use of available stock given the mismatch in demand and supply.
6. The Council may, from time to time, agree a local lettings policy for a specific group of properties that varies from these published rules. Information on such schemes will be explained fully when properties are advertised or allocated and will not form a greater proportion of annual lettings than 5% of available properties.
7. Specific rules apply where an applicant asks to add extra household members to their application, particularly where this affects the size of property required. See Appendix 2.

Size of Properties That Can Be Bid For

An applicant may bid for a property of the size that the Council has assessed as him/her as needing or a property with one bedroom less. This only applies to advertised Council properties and not those owned and managed by a Housing Association.

If an applicant successfully bids for a property smaller than their assessed need and later re-registers for a transfer, their new application will start afresh and not be backdated to the date of their previous application.

Whilst applicants are entitled to invite friends/relatives to stay or live with them, should overcrowding occur as a result of additional people joining the

household, it is likely that the applicant will face a longer wait for rehousing due to the limited number of larger properties that become available. See also Appendix 2.

Types of Property That Can Be Bid For

The Choice Based Lettings system allows most applicants to bid for any type of property they prefer within the limits of the bedroom criteria detailed above.

Where priority has been awarded for a specific type of property the Council reserves the right not to offer accommodation to an applicant who has successfully bid for it, irrespective of their final bidding position, if it does not meet the type of property recommended. e.g. if a ground floor flat with no stairs is recommended, a successful bid for a house may not be offered.

Applicants awarded additional preference for adapted properties, currently allocated by Council direct offers, will be able to bid for twelve months for properties advertised in the ChoiceHomes magazine, even though they may not currently be suitable. Even if their final bidding position is No 1, the Council may only allow an offer of the tenancy to be made if a Council surveyor and occupational therapist confirm that the property cannot be suitably adapted within available cost limits if funds are available to undertake the works.

Appendix 2: New Family Members Added to Existing Applications

- Where an applicant's household increases s/he will be reassessed on the basis of the new household size without affecting the date that the application was registered providing the increase is due to:-
 - A child being born to an existing household member.
 - A child of an existing household member arriving from elsewhere, (e.g. abroad) to join his/her parents. This will not apply if the child had previously been living with his/her other parent and could reasonably be expected to have continued living there.
 - A child being adopted by an existing household member.
 - a child being fostered where Social Services have confirmed the long term nature of the fostering arrangement.
- In other instances, unless there are exceptional circumstances an applicant may add an additional member to his/her household but the date of the applicant's registration will be treated as the date when the additional member is added. An example of exceptional circumstances would be where one of the Council's Panels is satisfied that an elderly person requires day to day care which can only reasonable be provided by a live-in carer.

Appendix 3: Housing Panels

Disability Panel

The Panel considers housing need, having regard to the needs of an applicant and the members of his/her household having particular regard to any disability/medical circumstances. Having regard to this assessment the Panel may:

- Determine level of priority.
- Recommend the type of property and any specific facilities required to meet a person's needs, such as central heating or an extra room.
- Recommend that a household needs to live in a particular locality.
- Assist the Allocations Team to prioritise requests for nomination to Housing Associations or other local authorities.
- Consider reviews submitted against offers of accommodation on the grounds of their suitability to meet medical and/or disability needs.
- Award a backdating of the additional preference start date in exceptional circumstances or extending the timescale at the end of the normal additional preference bidding period.

Social Need Panel

The Panel considers housing need, having regard to the needs of an applicant and the members of his/her household, having particular regard to any social issues. The Panel considers the following types of applications dealing with people:

- Experiencing mental health problems, disabling social factors, learning difficulties, drug/alcohol dependency or other social problems, including those being discharged from institutional care (other than those who will be actually homeless on discharge).
- With medical problems that are not sufficient on their own to confer priority, but where there are other relevant social factors.
- Who will only be able to cope with independent housing if accompanied by a committed package of support.
- Needing more settled accommodation in order to deal with issues arising under the Children Act.

- Families with a child with behavioural difficulties, which may require an additional bedroom or particular type of accommodation.
- Suffering domestic violence.
- Requiring additional space such as for a carer.
- To agree move on to general needs accommodation for users who no longer need supported housing, to release a supported housing vacancy.

And the Panel may consider the following type of issue:

- The risk level of a potentially vulnerable person continuing to live in his/her current address.
- The suitability of an offer of accommodation.
- The need for rehousing due to irreconcilable neighbour difficulties.
- Requests to agree exceptions to established policies e.g. rent arrears or like for like policy, where to adhere to the policy would cause special hardships.
- Requests to agree an applicant for any type of special housing provision, for example, floating support, supported housing because of a learning difficulty, mental health problems, alcohol or drug misuse, sensory difficulties, a need for low-rise or low density accommodation or accommodation in specific areas of the borough to give or receive support etc.
- Requests to agree that an additional household member can be added to an existing application without the loss of time waiting on the Register, especially if this would affect the number of bedrooms required.
- Requests for reasonable preference on the grounds that a household is occupying insanitary or unsatisfactory housing conditions, which pose an ongoing and significant threat to health and wellbeing.
- Requests to transfer following harassment including, verbal abuse, insults, intimidation, damage to property or possessions, threatening or abusive behaviour, racist, homophobic or other abusive graffiti, unprovoked assaults including common assault, actual bodily harm and grievous bodily harm, use of dogs, arson and attempted arson, threatening letters, witnesses of crime, or victims of crime, who would be at risk of intimidation amounting to violence or threats of violence if they remained in their current homes.

- Requests for priority on the basis that an applicant needs to move to a particular locality in Waltham Forest where failure to meet their need would cause hardship (to themselves or others).
- Requests for accommodation from an established carer of a Council tenant who has died.
- Award a backdating of the additional preference start date in exceptional circumstances or extending the timescale at the end of the normal additional preference bidding period.

Sheltered Housing Panel

Sheltered and extra care housing schemes for older people in Waltham Forest are managed by the Council and Housing Associations with differing styles of support:

- 1) 24 hour support service available through a scheme manager and lifeline system
- 2) Part time sheltered scheme managers
- 3) Peripatetic sheltered scheme managers
- 4) Extra care for people with additional care and support needs

The scheme manager:

- Helps in emergencies
- Helps to develop and review individual's support plans
- Gives practical support
- Makes daily visits if required
- Arranges leisure activities
- Links with health and social care

Applications for sheltered housing and extra care are assessed and prioritised by the Sheltered Housing Panel.

The Panel can recommend:

- Council sheltered housing
- Housing Association sheltered and extra care housing
- A nomination to another local authority where an applicant could receive support from a relative.

Written notification of Panel decisions are sent to the applicant by the Housing Registration Team or Allocations staff in the case of incoming nominations.

To be eligible for sheltered or extra care housing the applicant will:

- Normally be aged 50 years +,
- Benefit from the support of a sheltered scheme manager,

- Be in accommodation that is unsuitable for his/her needs, and
- Have a medical or social need for sheltered or extra care housing.

The Council's Choice Based Lettings system involving bidding for advertised vacancies applies to vacancies in sheltered housing schemes but not extra care housing. Assistance is available to any applicant who requires help to submit appropriate bids.

Appendix 4: Rent Arrears Policy

Reasonable Preference Band

Applicants in the reasonable preference band will not be eligible to receive an offer of accommodation if they have outstanding arrears to the Council of more than 8 weeks rent payments (after benefits calculated) or £1000 (whichever is the lower amount).

Although they may still take part in the bidding process, they will not be made an offer of accommodation. The property will be offered to the next eligible applicant.

Additional Preference Band

With the exception of agreed homeless cases, applicants in the additional preference band will still be eligible to receive an offer of accommodation if they have arrears. However, the Council reserves the right to exclude an applicant from receiving an offer if this will conflict with on-going eviction proceedings in relation to rent arrears. The Council may also exclude an applicant from receiving an offer of accommodation if the applicant is not making satisfactory efforts to make regular payments to reduce outstanding arrears.

The general policy of the Council concerning rent arrears and allocation of accommodation can only be disapplied (and/or modified) in circumstances that are, in the council's view, exceptional and where it is fair and just to do so. Any applicant or his or her representatives may make representations to the Council as to why the general policy of the council regarding rent arrears should be disapplied or modified.

When making offers of accommodation, the Council reserves the right to exercise a discretion (which may be exercised on a case-by-case basis or more broadly) in relation to levels of rent arrears that would otherwise prevent an offer of accommodation from being made, if it is in the interest of the Council to do so (for example, to reduce void periods of empty properties or to minimise the use of expensive temporary accommodation).

I am delighted to enclose Peabody's response to the London Assembly's Planning and Housing Committee review into overcrowding levels in London's social rented housing.

Overcrowding is one of the most difficult issues faced by some residents of housing associations in London and can have devastating consequences on families across the capital. In my role as Chair of G.15, a group of London's 15 largest housing providers, I was pleased to endorse the London Mayor's report, 'Overcrowding in social housing: A London Action Plan'. Social housing providers play a key role in alleviating overcrowding and have, over a number of years, developed innovative solutions and initiatives to alleviate the problem, but there is more to do.

Increasing the supply of larger, family homes can make an important contribution to reducing overcrowding but we maintain that a wider range of tools and initiatives are required to effectively tackle the problem. These include addressing under-occupation to increase the opportunities for overcrowded families to move, through incentives or more attractive options for 'downsizing'.

Peabody's Darwin Court is just one example of an attractive option for older people looking to downsize. It provides homes exclusively for people over 50 as well as a range of facilities and activities for the wider community. Residents have moved from much larger homes into one or two bedroom flats. We would like to invite members of the Committee to visit Darwin Court to see our work in action.

London Assembly Planning and Housing Committee – Overcrowding in London

Peabody response

1. Background and Introduction

- 1.1 Founded in 1862, Peabody is now one of London's oldest and largest charitable housing associations, providing around 19,000 homes for nearly 50,000 people across the capital. We have a powerful mission built on George Peabody's ambition to provide disadvantaged people with the opportunities they need to live a good life. We make London a city of opportunity for all by ensuring as many people as possible have a good home, a real sense of purpose and a strong feeling of belonging.
- 1.2 Overcrowding is one of the most difficult issues faced by some residents of housing associations in London. There are not enough larger family homes available to meet people's needs. Overcrowding restricts Londoners reaching their full potential and can have a devastating impact on family life. It can cause or contribute to poor physical and mental health; family breakdown; lower educational attainment due to a lack of space for children to study or relax; and disadvantage in the labour market.
- 1.3 As Chair of G.15, a group of London's 15 largest housing providers, I was delighted to endorse the London Mayor's report, 'Overcrowding in social housing: A London Action Plan'. Social housing providers play a key role in alleviating overcrowding and have, over a number of years, developed innovative solutions and initiatives to alleviate the problem. However, with London's population forecast to continue to grow and the problems intensifying, we need to do more.

2. What are your views on the proposition that "increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding"?

- 2.1 The rate of overcrowding in social housing exceeds that of owner-occupied or privately rented accommodation. It is therefore important that new, larger family homes are affordable and we welcome the Mayor's commitment in his London Housing Strategy to provide more family-sized homes, with 42% of new social rented and 16% of intermediate homes having three bedrooms or more.
- 2.2 We believe that increasing the supply of larger family homes would be beneficial to families across London and alleviate issues associated with overcrowding. The level of success might depend to what extent the size of larger homes built (i.e. number of bedrooms or bedspaces) matched the size reflected in the demand for larger properties.
- 2.3 There is, however, no "magic ingredient" to delivering affordable homes on a large scale. This requires some form of public investment, whether grant, equity or personal subsidy. Given the ongoing cuts in public spending, we question whether sufficient funding will be available to support the rapid delivery of the number of new, family-sized homes London needs.

2.4 We maintain therefore that a wider range of tools and initiatives are required to effectively tackle the problem of overcrowding. These include:

- Addressing under-occupation to increase the opportunities for overcrowded families to move – through incentives or more attractive options for 'downsizing'.

Darwin Court - Southwark

Peabody's Darwin Court is an attractive option for older people looking to downsize. It comprises 76 general needs and supported flats, built to Lifetime Homes Standard, and let to residents aged 50 or over. Darwin Court offers a number of facilities for residents and the local community, including a swimming pool, cafe, multi-purpose room, quiet areas, balconies and garden space. A number of resident-led community programmes and activities are run from Darwin Court. Residents have moved from much larger homes into one or two bedroom flats at Darwin Court.

We would like to invite members of the Committee to visit Darwin Court to see our work in action.

- Regular assessment of housing options, including clear information and advice on other tenures and markets. Peabody has carried out 'Thinking Ahead' interviews to identify how we can assist the most overcrowded families.
- Effective mechanisms for exchanging homes
- Increased mobility in the sector – supported by the allocations policies and systems operated by Local Authorities
- Making existing homes larger through extensions, conversions or additional outside space
- Practical adaptations to improve the use of existing space (e.g. flexible storage; space-saving furniture)
- Offering support in the process of moving home

2.5 Overcrowding should not be viewed simply as a housing issue. Peabody and other social housing providers play an important role in improving the life opportunities of their tenants and communities - through programmes in areas such as employment and training and health and well-being – which assist in reducing and alleviating the pressures associated with overcrowding.

2.6 The rates of overcrowding vary across London and increased supply would need to be targeted in areas of high demand – particularly if families were to retain links with their existing communities. Otherwise, this could result in

children being displaced from their schools and already marginalised families losing their social and support networks.

3. What are the obstacles to increasing the supply of larger family homes?

We note a number of obstacles to increasing the supply of larger family homes and these are set out below:

- 3.1 The Homes and Communities Agency appears to be setting a maximum level 'grant per home' and using this as the main benchmark of value for money. This increases the cost and disincentivises the provision of larger homes.
- 3.2 It is a challenge to provide adequate amenity space for larger homes in urban areas of the capital. Larger numbers of family sized homes require additional public services and facilities.
- 3.3 It is difficult to place larger properties at an appropriate floor level in block developments, due to competing requirements at the lower levels for wheelchair access properties and essential service areas, such as waste disposal facilities.
- 3.4 The cost of providing family homes in relation to the rent that can be earned is disproportionately higher than for smaller homes. Increased flexibility in the rent regime for Registered Providers
- 3.5 Land needs to be available in the right places and at the right price to provide the required numbers of family sized homes
- 3.6 It is unclear whether prospective tenants will be able to afford the target rent for larger properties with potential cuts in Housing Benefit payments.
- 3.7 Giving housing associations more flexibility and freedom in how they use their assets and around the rents they charge, could help to deliver a greater number of family homes.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

- 4.1 There are limited resources for building new homes in London. Prioritising the supply of larger, family-sized homes could negatively impact on other areas of housing need and these include:
 - 4.1.1 Housing for older people and in particular, homes that meet the access, space and adaptability needs of disabled and older people the number of older people is set to continue to grow and it is estimated that by 2031, 23% of the population will be over 65. We need to provide attractive housing options for older people, particularly if they are to be incentivised to 'downsize' and free up larger properties (see 2.4 above).

4.1.2 The number of households is set to increase by 570,000 by 2026 and the vast majority of these will be one-person households. There will therefore be continued demand for smaller properties.

4.2 There are many competing pressures on the finances and resources of housing associations. Prioritising the building of a greater number of larger homes would limit our capacity to deliver our objectives in these areas. The competing pressures include:

4.2.1 The need to carry out regular improvement works on our existing homes and communal areas.

4.2.2 We have been set an ambitious target to reduce carbon emissions and make our homes greener. This is a costly challenge across the sector.

4.2.3 Housing associations provide a wide range of community programmes and activities in the neighbourhoods in which we operate, as part of our commitment to build thriving communities. These are valued and we would like to do more.

5. The Mayor has plans to tackle overcrowding in social rented housing by:

a) introducing a target that 42% of new social rent homes should be three bedrooms or more; and

b) implementing the Mayor's action plan to reduce overcrowding

How effective are these measures likely to be compared with other potential policy initiatives such as a temporary moratorium on the building of small homes?

5.1 We welcome the Mayor's recognition of the importance of increasing the number of new social rent, family-sized homes. This measure has an important role to play in reducing overcrowding and meeting the continued demand for affordable housing. Setting a target does not, however, ensure delivery and housing associations' ability and capacity to achieve this, will largely depend upon the financial viability of schemes. As mentioned above, the rate of overcrowding varies across London and new, larger homes need to be built in the right areas and supported by appropriate local amenities and public services.

5.2 We support the holistic, multi-faceted approach to overcrowding, advocated by the Mayor's action plan. A single policy initiative is, in our view, less likely to be effective. Effective partnerships and joint-working between national, regional and local government, housing providers and key agencies are required to deliver the action plan.

5.3 It is not certain that a temporary moratorium on the building of small homes would result in a larger number of family homes. There remains a demand for smaller, one and two bedroom homes and, without a continued supply, there will be fewer options for those looking to 'downsize' and free up larger,

family homes. Population projections point to a growing number of lone households and a moratorium may store up problems for the future.

6. Conclusions

Peabody recognises that overcrowding represents a significant challenge for housing providers and one of the most difficult issues for our tenants. We are committed to delivering measures and initiatives to alleviate the problems associated with overcrowding. Peabody welcomes the Mayor's Action Plan and we would be happy to participate in further research or pilot projects in conjunction with the Committee.

Appendix – supplementary questions on overcrowding in London’s social rented housing OSRH017

Challenges to increasing supply

- What are the issues surrounding house building economics on increasing the supply of larger family homes?
- What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Our view is that The provision of larger homes delivered through our National Affordable Housing Programme (NAHP) and Local Authority New Build (LANB) programme will decline as a result of the downward pressure on grant levels (and continued measures of value for money based on unit numbers) coupled with the counting as grant the ‘mortgage’ raised through prudential borrowing to part fund LANB programmes.

Mayor’s approach:

- To what extent can the Mayor’s investment plans be altered to increase the proportion of family sized homes?
- What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

The Mayor could consider a range of incentives to encourage under-occupiers to down size thus freeing up social housing. There is already a range of incentives but the investment in this area could be increased (rewards for moving, build bungalows, moves to coastal areas etc). Also consider a large scale extensions and conversions programme to increase the size of the existing social housing stock.

Other measures for increasing supply:

- How can variable housing grant rates encourage the provision of more family housing?
- What other ways are there to increase the supply of larger family homes?
- What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

Expand and develop incentives to reduce under-occupation as mentioned above. Review criteria for NAHP funding to make it more attractive to build larger units. Consider a substantial extensions and conversion programme. Consider the building of “flexible housing” which can be adjusted to reflect the changing size in family households. A house would have adjustable partitions to enable it to be easily converted into sub-units as the children leave home and the remaining family need less space, thus freeing up

accommodation for another household. Explore ways in to encourage under-occupying owner-occupiers to make part of their home available for another household.

Extensions and Conversions Report

1. Executive Summary

- 1.1 A number of research studies that have been undertaken by various bodies reveal some of the measures proposed by Government to reduce the huge national debt and shrink the state, will both increase overcrowding and impact on our ability to continue to tackle overcrowding through the provision of new build homes.
- 1.2 The provision of larger homes delivered through our National Affordable Housing Programme (NAHP) and Local Authority New Build (LANB) programme will decline as a result of the downward pressure on grant levels (and continued measures of value for money based on unit numbers) coupled with the counting as grant the 'mortgage' raised through prudential borrowing to part fund LANB programmes. During this period of potential decline there is likely to be an increase in the demand for larger affordable homes as it is expected that the proposed local housing allowance caps will increase homelessness in the private rented sector, particularly amongst large families.
- 1.3 An increase in overcrowding will place further pressures on a range of statutory services during this period of substantial reductions in funding provision for public services. There is a clear correlation between the effects of overcrowding, the occurrence of anti-social behaviour, poor health and educational underachievement.
- 1.4 Providing larger homes through a substantial extensions and conversions programme could prevent an increase in overcrowding and contribute to tackling the current problem of overcrowding. It provides one of the quickest routes for providing larger homes and delivers value for money when compared to new build programmes. Such a programme would support the GLA to deliver on their new overcrowding action plan.
- 1.5 Also, the Government proposals to reduce local housing allowance of families who are under-occupying homes could result in the freeing up of family-sized council homes. LHA caps could also result in an increased demand for the properties which would be enlarged through an extensions or conversions programme. Further research is therefore required on the net effect of these factors on the supply and demand for large council homes before any decision is made to progress a substantial extensions and conversions programme.

Andrew Boff AM
Member of the London Assembly Planning and Housing Committee
City Hall
The Queen's Walk
London SE1 2AA

Dear Mr Boff,

Planning and Housing Committee: Overcrowding in London

In relation to your letter dated 21st July and the comments requested for 4 queries listed and other points raised, I am replying on behalf of our Director, Mike Cooke. We have sought advice from internal teams and the following represents a composite response

1) Increasing the supply of larger family homes would be effectively tackling the housing problems of overcrowded Londoners

A larger supply of large homes in the market sector (and to a great extent the shared ownership sector) will not reduce overcrowding in Camden as they will only be accessible to families with relatively high incomes.

The majority of Camden's overcrowded families are in the social rented sector, and an increase in supply of large social rented homes is the best prospect to ease these problems, assuming rents can be made affordable and within HB caps.

2) Obstacles to increasing the supply of larger units

The biggest problem limiting the supply of additional large social rented homes is the HCA grant regime (grants don't increase adequately to reflect unit size) and the rental revenue doesn't reflect the increased cost of supply.

Amenity areas for larger families in higher blocks, more common in Camden, are also likely to be in relative short supply with possible complications in the use of communal areas within blocks.

Where more larger units may reduce the overall unit numbers in blocks, this may also increase unit Service Charges and reduce affordability, especially in relation to relevant HB caps.

3) How effective would the proposed Mayor's plans be compared with other initiatives

The Mayor's target is irrelevant while the development of new large social rented homes is not economically viable.

In a brief review of the Action Plan, Camden is used twice as an example of best practice. By and large, it seems to be saying 'manage your housing stock well', which of course we try to do. The Plan is short on new initiatives.

4) What would be the impact of prioritising larger homes on other housing needs

'Prioritising' large homes has no impact on anything. Focusing grant on larger homes would logically reduce grant rates for smaller homes. This is a logical step, but there will be a need for small homes to relieve overcrowding (e.g. allowing adult non-dependents to leave family homes). Changes to housing benefit will make it more difficult to house adult non-dependents in the private sector.

In relation to the bullet points in the Appendix

Challenges to increasing supply

- *issues surrounding economics of increasing the supply of larger family homes.*

There must be a variety of ways related to development assistance and rent subsidies. Also the extent to which amenity provision and appropriate sites are made more suitable for larger families. We have not made a comprehensive assessment of the economics of dealing with relevant variations which would affect Planning Gain sought for all developments.

- Likely impacts of housing budget reductions on provision of social rented housing in London Borough of Camden

Housing budget reductions are likely to virtually halt the supply of additional social rented homes in London. Intermediate homes may see some increase as these are possible with less grant funding.

Mayor's approach

- *To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes*

It would be helpful to have funds available in Camden to combine smaller homes to create additional large homes.

- *What other options are available to the Mayor aside from his 42% target for homes with 3 or more bedrooms and measures in his overcrowding action plan*

Camden's Planning Guidance requires 50% of proposed homes to be 3B or larger. We achieved 44% two years ago but this figure has been reduced in the last year. Each site needs to be seen independently in term of Service Charges, accessible amenity space and feasibility of provision within the current grant system - which does not encourage larger units.

Other measures for increasing supply

- *How can variable grant rates encourage larger home supply*

The grant rate needs to relate to 'per person', not 'per unit' and rents (with associated HB) allowed to be adequate to repay borrowing required for larger units. Current reductions in grant rates which requires borrowing of 40+% of development costs does not allow affordable rents to be possible, unless subsidised.

- *Other ways to increase supply of larger homes*

It would be helpful to have funds available in Camden to combine smaller homes to create additional large homes. However, as the need shown below also requires about 10,000 smaller units, any initiative on larger units must also provide smaller units if overall need is to be addressed.

- *The market role for providing larger family homes and how can this be encouraged*

Large market homes in Camden will only be available to families with very high incomes, and will certainly not be generally available to families relying on 'capped' housing benefit unless they are in poor conditions and locations. There is some provision on small developments, below 10 units, but market conditions must change to bring forward development of these units.

The following current information relates to your queries on overcrowding in Camden related to **our waiting lists and allocation policies**.

1. Information on Camden's Housing Need Register: total applicants by size of home required* as of 24/08/10

Bedrooms needed*	Number of applicants	% applicants
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0	7088	33.84
1	6426	30.68
2	3569	17.04
3	2127	10.15
4	1011	4.83
5	455	2.17
6	170	0.81
7	77	0.37
8	12	0.06
9	9	0.04
10	3	0.01
11	1	0.00
Total	20948	100.00

* As defined by Camden's Housing Allocations Scheme, which holds that one room suitable for use as a bedroom (which includes living rooms not shared with another household) is needed by each of the following:

- an individual aged 11 or over or a couple
- two children aged under five
- two children of the same sex aged between five and 11
- any other child aged between five and 11.

2. Estimates of the scale and nature of overcrowding in social rented accommodation in your borough

We are able to provide information from three sources, all of which use slightly differing definitions of overcrowding, as follows:

2001 Census

2001 Census data indicated:

- 5% of households rented from the Council and 3% of other social renting households (compared to 1% of owner-occupied homes and 3% of homes rented privately or occupied rent free) were occupied at a density of more than 1.5 persons per room, and
- 32.8% of households who rented from the Council and 33.8% of other social renting households (compared to 20% of owner-occupying households and 42.7% of households renting privately or living rent-free) had one or more rooms fewer than they needed according to the Census occupancy rating.

2008 Housing Needs Survey update

Our 2008 Housing Needs Survey update assessed that there were 5,540 households living in overcrowded accommodation, using a bedroom standards that specifies that a separate bedroom (not including any living rooms) is needed by:-

- each co-habiting couple,
- any other person aged 21 or over,
- each pair of young persons aged 10-20 of the same sex, and
- each pair of children under 10 (regardless of sex), and

that unpaired young persons aged 10-20 are paired with a child under 10 of the same sex or, if not possible, allocated a separate bedroom. Any remaining unpaired children under 10 are also allocated a separate bedroom. Bedrooms include bed-sitters, 'boxrooms' and bedrooms identified as such by survey respondents, even though they may not be used in this way.

This accounted for 46.5% of all households living in unsuitable accommodation.

Although the survey update did not identify the number or proportion of social renters living in overcrowded conditions, it did assess that households living in unsuitable accommodation were concentrated in social rented accommodation, with 61.4% of those living in unsuitable accommodation living in homes of this tenure. It also established that 21.3% of those living in social rented accommodation lived in unsuitable accommodation.

Housing Needs Register

Of a total of 17,735 housing applicants who have active housing applications, 3,624 (20.4%) are recognised as either overcrowded or severely overcrowded, as defined by the bedroom standard set out Camden's Housing Allocations Scheme. The bedroom standard is set out under 1 above. Households are regarded as severely overcrowded where they are lacking two or more bedrooms.

	Total	Overcrowded	Severely overcrowded	All cases of overcrowding
Council tenant	4,555	530	136	666
Housing Association tenant	1,944	251	73	324
Other	11,236	2,418	216	2,634
Total	17,735	3,199	425	3,624

Of those who are overcrowded, 666 (18.4%) are Council tenants and 324 (8.9%) Housing Association tenants. The figures for Housing Association tenants need to be treated with caution because applicants are asked to assess their own housing tenure and the Council only checks the information provided for applicants whose circumstances mean they have a genuine chance of securing social housing. (The same does not apply to Council tenants, as the Council holds tenancy records for them and can therefore identify their tenure correctly when they make housing applications.)

In addition to the 666 Council tenants registered on the Council's Housing Needs Register and entitled to overcrowding points, there are a further 892 applicants who are living in Council homes (for example, as non-dependents), registered on the Housing Needs Register, and recognised as overcrowded. Of these, 823 are overcrowded and 69 severely over-crowded. It is essential that such households are taken into account in gauging the extent of overcrowding in the social rented sector.

3. Details of the borough's housing allocation policies and priorities
Camden's housing allocation policy is available, both in full and in summary form, at <http://www.camden.gov.uk/ccm/content/housing/housing-policy-and-strategies/full-housing-allocation-scheme.en>

The 'Summary of Points' on pages 17 to 19 of the Allocations Scheme Summary sets out seven pointing groups, which reflect the priorities of the allocations policy. These include:

- securing accommodation for homeless households (Group A),
- preventing homelessness (Group B),
- enabling applicants to move from insanitary, overcrowded and unsatisfactory accommodation (Group C),
- enabling applicants with a medical need to move to do so (Group D),
- enabling applicants fleeing harassment or violence to move to safe accommodation (Group E),
- helping care leavers, vulnerable people with support needs and ex-offenders to access secure and suitable housing (Group F),
- enabling applicants who need to relocate to a particular area of the borough to prevent hardship to themselves or others to do so (Group G)

The priority of overcrowded households was increased by changes to the allocations scheme made in late 2005. Further changes made in 2007 allowed for the award of additional priority to households in particularly small accommodation.

One further priority relates to building stronger Camden communities, as set out under that heading on page 14 and in line with the Community Strategy's commitment to a connected Camden community.

Overcrowding in Camden

Camden currently has 20,852 households registered for housing with 17,633 being active and able to bid for new homes via our Choice Based Lettings Scheme (CBL). There are 3,219 inactive applications where the applicants are registered for housing but cannot bid for new homes because their cases are suspended for various reasons. For example, they have support needs and are not deemed ready for independent living.

The size of home needed by those registered for housing is as follows;

Bed Need	Total
Studio	7,019
1 bedroom	4,978
2 bedrooms	5,010
3 bedrooms	2,132
4 bedrooms	1,001
5 bedrooms	443
6 bedrooms	169

7 bedrooms	76
8 bedrooms	12
9 bedrooms	8
10 bedrooms	3
11 bedrooms	1
Total	20,852

Overcrowding in social housing in Camden

Camden defines as overcrowded any household that lacks one or more bedrooms as assessed under its Housing Allocations Scheme. Where a household lacks 2 or more bedrooms they are considered to be severely overcrowded and receive additional points priority under the Scheme. Camden currently has 952 social housing tenants registered for housing who have been assessed as overcrowded and are in receipt of overcrowding points to enable them to bid for larger homes. Of these households 715 are Camden Council tenants (LBC) and 237 are Housing Association (RSL) tenants.

The size of home they currently live in and the size of home they need is as follows;

Overcrowded Camden Council tenants (LBC)

	Bedsized needed										
Current bedsize	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed	7 bed	8 bed	9 bed	10 bed	Total
0	0	49	3	1	0	0	0	0	0	0	53
1	0	0	96	4	1	0	0	0	0	0	101
2	0	0	0	250	41	8	2	1	0	0	302
3	0	0	0	0	148	51	20	1	1	0	221
4	0	0	0	0	0	16	13	2	2	0	33
5	0	0	0	0	0	0	3	1	0	0	4
6	0	0	0	0	0	0	0	0	0	1	1
Total	0	49	99	255	190	75	38	5	3	1	715

Overcrowded RSL tenants

	Bedsized needed										
Current bedsize	1 bed	2 bed	3 bed	4 bed	5 bed	6 bed	7 bed	8 bed	9 bed	10 bed	Total
0	0	44	4	1	2	0	0	0	0	0	51
1	0	0	42	10	3	0	0	0	0	0	55
2	0	0	0	61	14	2	1	0	0	0	78
3	0	0	0	0	30	9	4	1	0	0	44
4	0	0	0	0	0	2	3	1	0	0	6
5	0	0	0	0	0	0	1	1	0	0	2
6	0	0	0	0	0	0	0	1	0	0	1
Total	0	44	46	72	49	13	9	4	0	0	237
All total	0	93	145	327	239	88	47	9	3	1	952

As a summary of overcrowded units related to applications for the past 5 years

Date	All			Social tenants		
	Applications	OC/SOC	%age	Applications	OC/SOC	%age
01/04/2006	14,890	2559	17.19%	5,480	794	14.49%
01/04/2007	15,797	2754	17.43%	5,355	720	13.45%
01/04/2008	16,419	2732	16.64%	5,691	765	13.44%
01/04/2009	17,899	3163	17.67%	5,836	783	13.42%
01/04/2010	20,052	3944	19.67%	6,469	927	14.33%

The Housing Allocations Scheme – Priorities

Camden's Full Housing Allocations Scheme (Scheme) was implemented on 1 October 2007. The Scheme focuses on meeting local Council priorities: striking an appropriate and fair balance between complex legislative requirements, the needs of Camden residents and the Council's desire to create strong, sustainable communities. Reasonable preference is given within the Scheme to those in greatest housing need as prescribed by Part VI of the Housing Act. In addition to reasonable preference the Scheme also awards additional preference to households who are severely overcrowded (lacking 2 or more bedrooms) and under occupiers wishing to move to smaller homes.

The Scheme seeks to achieve five key policy aims:

- (i) To further increase allocations to overcrowded families and the priority given to families who are severely overcrowded;
- (ii) To increase the mobility of under occupiers;
- (iii) To increase priority of households who are helping to prevent their homelessness rather than moving into our temporary accommodation;
- (iv) To strengthen local communities by increasing the housing chances of applicants with longer-term residence in Camden.
- (v) To maintain electronic Self Assessment as a better and cheaper way for customers to register for housing and to make the lettings process easier to understand and administer;

In 2009/2010 Camden allocated 988 general needs homes of which 321 (32%) were to overcrowded and severely overcrowded households.

Camden recognises the detrimental affect overcrowding has on the wellbeing of households living in such conditions and, that the chronic shortage of social

housing in the borough means that the situation cannot be resolved in all instances by an allocation of a new and larger home.

Camden was successful in being awarded Enhanced Housing Options Trailblazer status at the end of 2008 and launched its Pathways for All Service in April 2009. The Service is part of Camden's Housing Need Group and offers tailored personal advice services to Council and other social housing tenants. Personal advisers provide advice, assistance and, where necessary, personal coaching to help tenants and other adults within the family address their housing needs, explore their housing opportunities and tackle wider issues around their wellbeing, health, educational achievement, employment and life skills. The Pathways For All Service continues to develop the innovative approach to working with overcrowded tenants that we have developed over the last two years. Our approach is to help tenants move, but if this is not possible we work with the family and other partners to lessen the impacts of overcrowding such as practical home adaptations tailored to the needs of the individual families.

Camden's Full Housing Allocations Scheme and a summary of the Scheme can be found on our website at www.camden.gov.uk/housing

I refer to your letter of 27th July and would reply as follows on the points that you raise;

G15 Group

Whilst I can support the hypothesis as posed for increasing the supply of larger homes to address issues which the capital faces with overcrowding, there are constraints to which registered social landlords are currently subject which adversely affect the sector's ability to respond which are drawn out in responding to the questions that you raise.

Challenges to increasing supply

1. What are the issues surrounding building economics on increasing supply of larger family homes?

Planning density expectations in London favour flats over houses. High child density in social housing flats can without careful consideration give rise to management difficulties. Therefore, large family flats tend to be avoided. Furthermore, land values often make building low density houses in central areas uneconomic.

2. What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Social rented housing requires more subsidy to be viable given rent restrictions, this is particularly true of larger family homes and will be compounded by cost increases to meet higher space and quality standards. Budget reductions will impact on the number and/or quantity of new social homes unless additional cross subsidy from other sources such as homes for sale or S106 contributions are made available, which currently looks unlikely, or target rents are relaxed.

Mayor's approach

1. To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?

The format of setting government grant rate targets on a per unit basis tends to encourage smaller social rent homes because it makes them look more cost efficient. Setting grant targets on a per person basis would overcome this.

2. What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

No comment

Other measures for increasing supply

1. How can variable grant rates encourage the provision of more family housing?

Larger family homes suffer more from the target rent system (ie costs increase to a greater extent than rental income) and large homes are also more likely to hit the maximum rent caps. This makes them less viable to produce.

2. What other ways are there to increase the supply of larger family homes?

No comment

3. What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

No comment

The North London Sub-Region

London Assembly responses:

Overcrowding in London's social rented housing –OSRH020

1) What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

Findings resulting from collating statistics on the levels and size of social housing stock within the North London sub region boroughs show that on average, only one third of their stock consists of family sized accommodation (3 bedrooms plus), with the percentage of 4 bedroom plus stock dramatically less with a borough average around 4-5% of stock. With the 2007/8 London Strategic Housing Market Assessment concluding that around 40% of the requirement for new social housing is for homes with four bedrooms or more, it is clear that at present demand for larger family homes far outstrips supply. Therefore a scheme that will increase the supply of larger family homes and rebalance stock levels is essential, and will be welcomed by all boroughs.

However, overcrowding is a hugely complex issue which cannot solely be addressed through increasing the supply of larger homes, particularly if it is at the expense of a decline in the development of smaller one and two bedroom properties, which are just as important in tackling overcrowding through being able to house adult non dependants and previous under occupiers. Additionally, the anticipated steep increase in London's population will clearly supersede the amount of larger family housing built in the coming years, and therefore unfortunately the problem is set to continue.

It is essential that any initiative and target set to tackle overcrowding has a strong focus on making better use of existing housing stock, which is an area that local authority Pathfinderers have dedicated a lot of time and resources, with significant results.

Audit stocks within some of the North London sub regions boroughs have shown staggering amounts of under occupied properties within social housing stock, with these larger properties being occupied by not only older people, although the majority are, but also a significant amount of working age tenants.

Schemes created by Pathfinder authorities to encourage tenants to downsize from under occupied properties have been both far reaching and innovative, with boroughs offering generous incentive schemes to intensive hand holding support (the latter being shown to be the more successful approach over any amount of money offered), to 'New Generation' schemes aimed at rehousing adult non dependants, to policies on concurrent moves and dedicated mutual exchange schemes between overcrowded and under occupied households.

Partnership working between RSLs and local authorities also need to be improved to introduce common incentive schemes and hand holding support to increase the amount of under occupied moves between the organisations.

Some consideration on how to effectively prevent another generation of under occupied homes could also be given in terms of what could be included in allocation and tenancy policies to allow for the better use of existing stock.

2) What are the obstacles to increasing the supply of larger family homes?

- The lack of funding available to local authorities to build new homes
- The amount of land that is available to local authorities to build on, particularly within inner London boroughs. The infill land sites are still available for building on are also not always suitable for family homes
- The recent removal of local house building targets; this removes the statutory obligation for local authorities to build new homes, unless the Mayors target overrides this
- Conflicting priorities for local authorities requiring RSL's to building smaller properties. Most boroughs are finding that much of their one and two bedroom stock is not suitable for previous under occupiers, who usually require a certain type of property (i.e. ground floor flats with ample storage space with a separate kitchen and living room), and there is a desire for RSL's to provide these particular types of properties in order to incentivise under occupiers to give up their larger properties to allow overcrowded families to move into them. Indeed, building properties that are particularly suitable for under occupiers is just as, if not more, important in order to increase the supply of larger family homes to tackle overcrowding
- Any planning for new housing developments must keep in mind that there will always be a proportion of people who are unwilling to leave their current homes if it means moving further out of London and away from their family, friends, local schools and support networks. Indeed, there have been several reports from boroughs within the North London sub region that families will continue live in severely overcrowded conditions rather than move to a larger property in another area. These findings are echoed by the evidence provided in the recent Mobility Taskforce report, which found that nearly 90% of social tenants who moved home moved less than 10 miles

3) The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce social housing¹.**

How effective are these measures likely to be, compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

Introducing a target to build larger properties would be more effective than a temporary moratorium, as the latter doesn't *oblige* local authorities to build larger homes whilst stopping the building of smaller homes, which would make it much harder for local authorities to tackle overcrowding.

As I mentioned before, overcrowding is a complex issue, and evidence has shown that much of the overcrowding within social housing can be caused by adult children remaining in the familial home, and indeed sometimes bringing up their own families within that home, sometimes referred to as 'concealed households'. Therefore, most council's have to create initiatives that specifically target adult non dependant to ease overcrowding, through 'New Generation' schemes and concurrent move policies, whereby the adult children are given priority through the allocations system to access their own home. A temporary moratorium on

¹ http://www.london.gov.uk/sites/default/files/Overcrowding_Action_Plan.pdf

building smaller sized homes that can facilitate such initiatives would prevent local authorities from easing overcrowding in this way.

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

If prioritising the building of larger homes has an adverse effect on the number of smaller one and two bedroom homes being built then this could of course have a negative impact on single homeless individuals and those with small families accessing social housing, as well as providing properties that are appropriate for previous under occupiers, adult non dependants and 'concealed households'; please see above.

Appendix – supplementary questions on overcrowding in London's social rented housing:

Challenges to increasing supply

What are the issues surrounding house building economics on increasing the supply of larger family homes?

What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Mayor's approach:

To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?

Dedicated resources for Pathfinders to be able to continue their excellent work with making the best use of existing stock, particularly through schemes aimed at reducing under occupation as stated above, is also essential in order to increase the proportion of family sized homes in a cost effective way.

What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

Dedicated resources made available for Pathfinders to continue work with making best use of existing stock as stated above, as well as looking at policies to allow local authorities to make better use of the private rented sector in order to widen their options in order to tackle overcrowding, which I will expand on in the questions below.

The introduction of LHA caps are also of major concern to all of the boroughs within the North London sub region. Each of the boroughs are concerned that the caps will increase the polarisation of tenants on housing benefit further into the cheaper areas of the borough, and inner London boroughs such as Islington, Camden and Westminster will be particularly affected, with many of their tenants living in PRS properties unable to afford to stay there anymore. Outer London boroughs are already beginning to take the brunt of the inner to outer London migration, and are beginning to have to deal with the extra competition for private landlords in their boroughs, as well as having to deal with their own tenants who are unable to afford properties in the more expensive areas.

In summary, we are concerned that the LHA housing cuts will result in an increase in pressure on housing and support services in less expensive areas of London and possible 'ghettoisation' within certain areas, particularly within the outer London boroughs

Other measures for increasing supply:

How can variable housing grant rates encourage the provision of more family housing?

What other ways are there to increase the supply of larger family homes?

Making better use of existing stock through the many initiatives pathfinders are currently operating, some of which are described above, provide an excellent and cost effective method of increasing the supply of larger family homes.

In addition to these, flexibility within boroughs allocation policies and local lettings plans is required in order to allow local authorities to making the best use of their existing stock, for example; a) prioritising under occupiers where they are looking to downsize, b) allowing boroughs and RSL's to increase the number of and/or ring fence existing smaller homes that are particularly attractive to under occupiers to move into, thus encouraging them to move and free up their properties, c) agreements' put into place that will increase the number of chain lettings within council and RSL stock in order to tackle overcrowding and under occupation.

What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

Local authorities have increasingly been using the private rented sector as another option with which to ease overcrowding and access larger family homes which are in poor supply within their own housing stock. This has been within the form of rent deposit schemes whereby social tenants are relinquishing their tenancies to live in more appropriately sized PRS properties, aided with the help of the Local Housing Allowance, as well as through 'breathing space' initiatives that offer severely overcrowded families the chance to stay in more appropriate PRS accommodation until a suitable home can be found for them within the social rented sector, which due to the lack of stock can take several years. Therefore the caps in the LHA is of huge concern for local authorities as described above, as it will effectively reduce the flexibility that local authorities are currently able to access.

The role that Intermediate Renting schemes could play in order to tackle overcrowding could also be strengthened if some changes were made to it to make it more accessible to those on lower incomes. Feedback received from some of the North London sub regional boroughs is that where they have put economically active overcrowded households forward for the scheme, they have all been refused as their income and housing benefit was not sufficient to pay the rents demanded.

Low cost home ownership schemes also have the potential to play a role in housing overcrowded tenants, however, as the scheme currently stands, it is completely inaccessible for the vast majority of tenants. Indeed, evidence again sourced from the recent Mobility Taskforce report found that typical buyers of Low cost home ownership earn around £26,000, however statistics show that only 10% of existing tenant households take home over £20,900 a year.

In summary, the affordability of the above schemes need to be addressed in order to make them more accessible for lower income homes.

Boroughs could also be encouraged to develop more Housing Association Leasing (HALs) schemes – whereby landlords in the PRS can place their properties into a leasing scheme with a housing association to fully manage the property, whilst offering a guaranteed rent, even if the property is empty, and replacement or repair of any damage to furniture, fixtures and fittings to the original standards. Housing Association Leasing Direct (HALDs) also allow local authorities to

place families into the private rented sector through households signing a tenancy agreement with a Housing Association and thereby having access to the H.As full management service, which works with the households to resolve any issues and attempt to prevent homelessness wherever possible.

London Assembly
Planning and Housing Committee Review: Overcrowding in London –
OSRH021

Response from City of London Corporation

Key Information for the City of London

1. Waiting List Information @ 01 04 2010

	Numbers in Need
Studio / 1 Bed	847
2 Bed	213
3 Bed	132
Over 3 Bed	31
TOTAL	1,223

2. Scale and Nature of Overcrowding

Serious overcrowding is not a major issue for the City of London, but to ensure that the most up to date information is available, the City Corporation has undertaken a survey of social rented housing, including the Guinness Trust Estate at Mansell Street which lies within the City boundaries.

The survey found that almost all residents that identify themselves as overcrowded have registered for a move on the City's Housing Register. Of an overall total of approximately 1,200 households on the City's Housing Waiting List Register, most of whom are not City residents, 398 households are registered as overcrowded, of which 141 are existing City of London tenants and 20 are severely overcrowded. These families are in need of three bedrooms plus accommodation and the majority of the households are living on the Guinness Trust Estate.

3. City of London Housing Allocation Policies and Priorities

These are set out on the City of London website at:

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Housing/Council_housing/applying_for_housing.htm

4. Need for and Provision of Family Housing within the City of London

Provision of family and other housing accommodation in the City of London should be seen in the context of the City's primary role as the world's leading international financial and

business services centre. The City contributes over 4% of the UK's GDP and provides a significant source of employment for many people in London – every day approximately 340,000 people commute into the City for work, compared with a resident population of approximately 9,000. Both local planning policy (in the City of London Unitary Development Plan and emerging Local Development Framework) and London-wide policy (in the Adopted and Draft Replacement London Plan) aim to support and maintain the City's role, recognising the need to maintain strategically important globally-orientated financial and business services centres.

Whilst the City Corporation recognises that it needs to make provision for some additional housing, to address the needs of existing residents and some of the demand from workers, this needs to be considered within the context of the City's wider and primary business role.

In terms of the type of housing required in the City, the Housing Waiting List information (above) indicates that the need for housing is principally for studio and 1 bedroom accommodation, with a relatively low need for family-sized accommodation. These figures are also reflected in the make up of the City's residential stock (private, City of London and Guinness Trust accommodation). Of the residential stock of approximately 5,800 units, 98% are flats or maisonettes. Fifteen percent of the stock is studio flats, 49% one-bedroom, 26% two-bedroom and only 10% 3 bedroom or above. Sixty percent of households are single, 30% 2-person adult households and 10% adults with children.

Where larger family accommodation is required, the City has a number of ways of providing family housing. These include:

- re-lets of existing properties;
- encouraging families who under-occupy large properties to downsize;
- the provision of new family size units through s106 funding (e.g. the City Corporation facilitated the purchase of 10 family sized units by a housing association during 2009/10 to which the City has perpetual nomination rights). The City is currently seeking to develop 30 units in Southwark (of which 5 will be 3 bedroom). The City Corporation also have some nomination rights to housing associations such as Guinness Trust, and;
- seeking infill development opportunities on the City's HRA sites.

Planning and Housing Committee: Overcrowding in London

Response from Genesis Housing Group

September 2010 -OSRH022

About Genesis Housing Group

We provide homes and services to tens of thousands of people across London and the south east. The Group consists of PCHA, Pathmeads and Springboard housing associations. We also have a charitable foundation, Genesis Community. We are one of the largest and most diverse housing groups in the UK, and own and/or manage more than 40,000 homes. Our overriding aim is to put customers first and provide excellent service to all.

Executive Summary and Introduction

We welcome the opportunity to respond to the Planning and Housing Committee's review into overcrowding levels in London's social rented housing.

It is generally accepted that there is a shortage of larger family sized affordable housing, particularly in London. We support the Mayor's overall vision and commitment to halve severe overcrowding in social housing, and cut the number of social rented households under-occupying by two or more bedrooms by two-thirds, by 2016. It is estimated that 565,000 households are overcrowded in the capital, of which 234,000 are in the social sector. There is a particular concentration of overcrowding in London, where some 37% of all overcrowded households live. We are committed to tackling overcrowding because of the severity of the problem within our stock, and to this end have been involved in the data collection process across London 'Pathfinder' boroughs so we can help present as accurate a picture as possible of the levels of overcrowding and its impact on households.

Our approach to tackling overcrowding encompasses the following:

- Tackling homelessness through making overcrowding a priority. No families or households should be made homeless as a consequence of overcrowding
- Commit to Pathfinder schemes and a co-ordinated multi-agency approach
- Contribute fully to the development and implementation of overcrowding strategies in the local authority areas where we have a significant number of homes
- Develop and provide services aimed at those groups most likely to experience overcrowding
- Review the way our homes are used to meet housing need, including nomination agreements
- Give staff the knowledge and skills to understand and tackle overcrowding
- Increase communication and agree protocols with local authorities and other partners where this can help to reduce overcrowding
- Seek to provide an increased supply of properties targeted at alleviating overcrowding within our property portfolio
- Commit to reduce the number of cases who are overcrowded by two beds or more
- Incentivising under-occupying households to move to free up larger homes for larger households

We encourage the Mayor and his housing team to continue the dialogue already established with London's housing associations as more detailed plans on tackling overcrowding evolve.

Detailed response

1 What are your views on the proposition that ‘increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding’?

Increasing the supply of larger family homes encompasses a range of measures, including enabling underoccupiers to downsize, making existing homes larger and building more family sized homes. That said, it is our view that the most effective ways of tackling overcrowding is by building more family-sized homes and/or buying units of these size from the open market.

Although reversing the shortfall of new family-sized homes must be the main solution to overcrowding, this should not be considered the only way. Making better use of existing housing stock will also help tackle the problem. Increasing mobility within social housing and assisting those who want to move into the private sector can free up badly-needed larger units for overcrowded families. Since many potential moves involve low income, elderly or vulnerable tenants moving across local authority boundaries, central government, local government, landlords and funding bodies will need to work more closely together to facilitate moves, provide appropriate incentives and offer dedicated, tailored support. The Mayor can play an instrumental role in contributing to these discussions, which could touch on the following areas:

- Make moves out of areas of high demand easier and more attractive to tenants by joining up local, regional and national mobility schemes, ensuring that tenants are fully informed about what is on offer, and reimbursing recipient local authorities for the costs incurred accepting movers
- Offer more hands-on support, pay moving costs and give higher cash incentives for those vacating larger units, typically single elderly people
- Use funding from the National Affordable Housing Programme to build or purchase suitable properties in other regions for under-occupiers to move to
- Provide higher and more flexible funding for council and housing association schemes to extend existing units into larger accommodation. Even a loft conversion that adds only one extra bedroom can make a huge difference to an overcrowded family
- Where possible, prevent the sell-off of valuable family-sized homes by councils or housing associations.

2 What are the obstacles to increasing the supply of larger family homes?

The most significant obstacle to increasing the supply of larger family homes is the current funding system administered by the Homes and Communities Agency (HCA). From a development perspective, HCA grant is assessed on a per unit basis, not per person. This means that existing national policy is focused on the delivery of as many units as possible, creating a bias towards smaller units. This means that there is little incentive to develop larger units as they are perceived not to offer value for money compared with smaller

homes that need less grant, especially in areas of high land value. To enable an increase in the building of larger family homes, we believe that the HCA and CLG will need to reconsider funding regimes to incentivise this kind of housing.

That said, there is a need to get the balance right between incentives to build new larger units and incentives to make use of existing larger units, for example, through addressing under-occupation and a purchase and repair programme. Bringing new developments on site takes time, and in the short term the best way to re-house overcrowded families is by acquiring suitable properties on the open market, which will also have the added benefit of promoting mixed and balanced communities.

3 The Mayor has plans to tackle overcrowding in social housing by:

- **Introducing a target that 42% of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce social housing overcrowding**
How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

Although we would accept that more family housing is needed, we would argue that the target of 42% of new social rented homes to have three bedrooms or more should and could not be applied universally across all London boroughs, each with their own levels of housing demand and need. It also stands in opposition to the localism message emerging from central government. Within Genesis stock, we have found that significant overcrowding exists in inner London boroughs such as Westminster and Brent, whereas overcrowding rates are lower elsewhere. It would therefore be sensible for the focus on delivering larger units to remain in boroughs where the need and capacity is highest. Setting a blanket target of 42% is arbitrary and does not take account of local context.

A moratorium on building smaller homes would not be appropriate as not all locations will suit family housing. Given pressures on density in the capital, we feel that it would be more appropriate to work with the current state of housing in London instead of setting unjustifiable targets or putting a halt on the development of smaller homes

4 What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

According to the GLA's most recent Strategic Housing Market Assessment (SHMA), carried out in 2008, around 40% of the requirement for new social housing is for homes with four bedrooms or more, reflecting both high levels of overcrowding and the numbers of new family homes being built. While there is obviously a significant demand for family-sized market homes in the capital, the SHMA found little net requirement for this type of housing across London, although there are bound to be local variations. This low net requirement for family-sized homes in the market arises mainly because so much of London's future household growth will consist of single person households. In fact, of the

750,000 to 850,000 additional households that the capital will have by 2031, almost three quarters will be single person households. In light of this demographic trend, we are concerned that prioritising the building of larger homes may impact negatively on providing much-needed smaller units in the capital.

Pragmatically, we must assume that high levels of overcrowding will continue in many areas for some years to come. As well as trying to reduce overcrowding, more should be done to mitigate the worst effects on overcrowded households. Measures could include:

- Developing packages of services tailored to the circumstances and particular needs of overcrowded families
- Producing a booklet for overcrowded families containing all relevant information on the services available to help improve their quality of life
- Co-ordinating education and children's services to ensure that overcrowded households have access to Sure Start services, neighbourhood nurseries, young people's services and after-school clubs
- Improving and developing safe and suitable play and activity facilities for children and young people on estates, giving them something to do outside of overcrowded homes and reducing any resulting stress and anti-social behaviour.

It would be disingenuous not to make reference to the strains on the public purse in the current climate and how we can best achieve value for money in tackling overcrowding. Tackling overcrowding effectively will initially mean a sharp and sustained increase in the supply of family-sized homes that are affordable to overcrowded families. Whether this comes through new build, acquisitions, transfers, empty homes returned to use or helping overcrowded households access the market, the cost will probably be initially high. This is partly because overcrowding imposes costs to central and local government through its knock-on effects on other social problems: it is linked to a variety of health problems, to poor child development and educational outcomes, to anti-social behaviour in young people and to higher levels of homelessness.

However, the value gained from increasing the supply of family homes also comes from its potential to set off chain reactions of moves, as the overcrowded family that moves in leaves behind a property that is filled by another household, who may vacate a property which is filled in turn by another household, and so on. These chains can resolve several cases of need, providing huge value for the initial expenditure. Finally, the last unit vacated, for example a flat on a council estate, could be sold on the market to an economically active household, which could provide funding for the initial expenditure on new build or acquisitions while contributing to mixed communities. Enabling housing associations to adopt more flexible asset management strategies such as this will provide a spur to innovation.

Please see below the response of the London Borough of Barking and Dagenham to the Planning and Housing Committee: Overcrowding in London.

- Please see attached a recent housing register breakdown. We are not able to provide this in terms of numbers by size of home required.
- I have also attached the most recent figures we have in relation to overcrowding.
- This is the link to our More Choice In Lettings allocation policy

<http://www.barking-dagenham.gov.uk/6-living/housing/advice/pdf/allocations-policy.pdf>

1. What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

We would advocate a wider approach as we need a balanced supply of housing supply in terms of size of properties. A supply of smaller homes is also needed to meet single person household growth, and also to provide for households that are underoccupying larger family size homes.

2. What are the obstacles to increasing the supply of larger family homes?

Firstly, the challenge is the weakness of the market and the challenging conditions for developers. A certainty of lack of grant for new affordable homes post the October Comprehensive Spending Review will be a further pressure on new development.

3. The Mayor has plans to tackle overcrowding in social rented housing by:

- Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and
- Implementing the Mayor’s action plan to reduce social housing¹.

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

The Mayor’s approach is fundamentally correct as it is not practical nor correct to place a moratorium on building small homes. We should seek to encourage increase in supply of family size intermediate homes targeted at overcrowded households in social rented housing. We believe that a temporary moratorium would not help, as around 40% of our waiting list is single people.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London’s housing needs?

Again although we need more larger homes, this should not be at the expense of smaller sized homes. In spatial terms this would potentially work for outer London Boroughs such as Barking and Dagenham, which

has significant capacity for new development. It is essential to ensure that sustainable mixed communities are created.

Please let me know if you require further information.

Regards

Grant 2007/08 Overcrowding Data Monitoring Report

Local Authority: Barking & Dagenham	Submitted by:	Date: 27 Jan 2010
Contact Number:		

Please read the attached explanatory notes before completing this form. The numbering of the notes accords with the question numbers used in the form (shown in column A). When complete, please return this form by email to: shireen.maddon@communities.gsi.gov.uk

A. Baseline Figures as at 01/04/09

Overcrowded households on waiting lists / all tenures

1. Overcrowded households from all tenures on both LA and RSL waiting lists wanting to be re-housed as on 01/04/09				On LA waiting list	On RSL waiting lists	Total on 01/04/09	
Question 1	No. of households recorded as overcrowded by the Bedroom Standard		Total	1,692	32	1,724	
Question 1a	Of these households how many are currently living in each size of accommodation?	1 bed	total overcrowded	845	3	848	
			of whom severely o/crowded	69	0	69	
		2 bed	total overcrowded	700	27	727	
			of whom severely o/crowded	47	5	52	
		3 bed	total overcrowded	142	2	144	
			of whom severely o/crowded	21	0	21	
		4+ bed	total overcrowded	5	0	5	
			of whom severely o/crowded	3	0	3	
Question 1b	Of these households, how many are existing social tenants seeking a transfer?			628	32	660	
 of whom, the number that are severely overcrowded			33	0	33	
Question 1cand how many are new applicants seeking social housing?	from Private Rented Sector	1052	0	1052		
		from Owner Occupation	12	0	12		
		Check total (1b+1c)	1692	32	1724		
				if cell is red it's because the check total differs from the total in E12	if cell is red it's because the check total differs from the total in F12	if cell is red it's because the check total differs from the total in G12	If any of these cells are red please correct as appropriate

Under-occupied households on waiting list and wanting to downsize

	2. Under-occupied social renters on both LA and RSL waiting lists wanting to be re-housed as on 01/04/09		On LA waiting list	On RSL waiting lists	Total on 01/04/09
Question 2	No. of households recorded as under-occupied by the Bedroom Standard	Total	341	11	352
Question 2a	Of these households how many are currently living in each size of accommodation?	3 bedrooms	332	11	343
		4 bedrooms	9	0	9
		5+ bedrooms	0	0	0

B. Impact on Temporary Accommodation, April 2009 to March 2010**Overcrowded households moving into Temporary Accommodation**

3. Impact on Temporary Accommodation				Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	
				Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	
Question 3	No. of overcrowded households accepted as homeless and provided with temporary accommodation during each quarter		Total	6	4	5	0	
Question 3a	Before moving into Temporary Accommodation, what sized accommodation did these households occupy?	1 bed	total overcrowded	2	2	0		
			of whom severely o/crowded	2	1	0		
		2 bed	total overcrowded	3	0	3		
			of whom severely o/crowded	3	0	3		
		3 bed	total overcrowded	1	2	1		
			of whom severely o/crowded	0	2	1		
		4+ bed	total overcrowded	0	0	1		
			of whom severely o/crowded	0	0	1		
Question 3band what housing tenure did they come from?		Social Rented Sector	2	3	1		
			Private Rented Sector	4	1	4		
			Owner Occupation					
			Check total (for 3b)	6	4	5	0	
				if cell is red it's because the check total differs from the Q1 total in E39	if cell is red it's because the check total differs from the Q2 total in F39	if cell is red it's because the check total differs from the Q3 total in G39	if cell is red it's because the check total differs from the Q4 total in H39	If any of these cells are red please correct as appropriate

Overcrowded households in TA: when moved into settled accommodation

Question 4	4. Number of homeless households moved into Temporary Accommodation in each quarter against the quarter in which they were moved into settled accommodation		Of all households moved into TA after 01/04/09, how many were moved into settled accommodation in each quarter?					Check total	
			into settled accomm. in Q1	into settled accomm. in Q2	into settled accomm. in Q3	into settled accomm. in Q4	still in TA		
	homeless households moved into TA during Q1	on Housing Benefit	6	0	0			6	if cell is red it's because check total differs from Q1 total in E39
		not on Housing Benefit	0	0	0				
	homeless households moved into TA during Q2	on Housing Benefit		4	0			4	if cell is red it's because check total differs from Q2 total in F39
		not on Housing Benefit		0	0				
	homeless households moved into TA during Q3	on Housing Benefit			5			5	if cell is red it's because check total differs from Q3 total in G39
		not on Housing Benefit			0				
	homeless households moved into TA during Q4	on Housing Benefit						0	if cell is red it's because check total differs from Q4 total in H39
		not on Housing Benefit							
If any of the above cells are red please correct as appropriate									

C. The number of overcrowded households added to the waiting list and the number re-housed, April 2009 to March 2010

Overcrowded households added to the waiting list in each quarter

Question 5a	5. The number of overcrowded households seeking a transfer and added to the waiting list in each quarter		Local authority waiting list				RSL waiting list(s)			
			Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
			Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
	Total number of overcrowded social households added to the waiting list in each quarter		39	54	14		1	4		
..... of whom, the number that were severely overcrowded		0	0	0		0	1			
Question 5b	Total number of households seeking social housing because of overcrowding	from Private Rented Sector	183	196	129		0	0		
		from Owner Occupation	4	0	0		0	0		

Grant 2007/08 Overcrowding Data Monitoring Report

Overcrowded households re-housed in each quarter into the private rented sector

7. The number of overcrowded households re-housed in each quarter into the <u>private</u> rented sector	Local authority waiting list				Local authority waiting list			
	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 7a Total number of overcrowded social households re-housed in each quarter into the private rented sector	1	1	0					
..... of whom, the number that were severely overcrowded	1	0	0					
Question 7b Total number of overcrowded households from outside the social rented sector re-housed in each quarter	from Private Rented Sector	0	0	0				
	from Owner Occupation	0	0	0				

D. The number of overcrowded households in the social sector who received a housing options visit, April 2009 to March 2010

Overcrowded households visited

8. The number of overcrowded households visited in each quarter	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 8a Total number of housing options visits to overcrowded social households	47	37	34	
..... of whom, number of visits to severely overcrowded households	1	4	12	
Question 8b Number of overcrowded social households who accepted in-situ solutions	0	0	0	
..... of whom, the number that were severely overcrowded	0	0	0	

E. Under-occupied households applying to downsize and the number re-housed, April 2009 to March 2010

Under-occupied households applying to downsize and the number re-housed

9. The number of under-occupied households applying to downsize in each quarter	Local authority waiting list				RSL waiting list(s)			
	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr
Question 9 Number of households applying for a transfer due to under occupation	0	1	0	0	7	0	0	0
Question 9a Of these households how many are currently living in each size of accommodation?	3 bedrooms	0	1	0	7	0		
	4 bedrooms	0	0	0	0	0		
	5+ bedrooms	0	0	0	0	0		

10. Under-occupied households re-housed in each quarter	Local authority waiting list				RSL waiting list(s)			
	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)	Quarter 1 (1/4/09 - 30/06/09)	Quarter 2 (1/07/09 - 30/09/09)	Quarter 3 (1/10/09 - 31/12/09)	Quarter 4 (1/01/10 - 31/03/10)
	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr	Due 28 Jul	Due 28 Oct	Due 28 Jan	Due 30 Apr

Grant 2007/08 Overcrowding Data Monitoring Report

Question 10	No. of under-occupied households rehoused into suitable accommodation	Total	4	6	5	0	0	0	0	0
Question 10a	For these rehoused households what size accommodation did they vacate?	3 bedrooms	2	6	3		0	0		
		4 bedrooms	2	0	2		0	0		
		5+ bedrooms	0	0	0		0	0		

F. Update figures as at 01/04/10**Overcrowded households on waiting lists / all tenures**

11. Overcrowded households from all tenures on both LA and RSL waiting lists wanting to be re-housed as on 01/04/10			LA waiting list	RSL waiting list(s)	Total as at 01/04/10	
No. of households recorded as overcrowded by the Bedroom Standard			Total	0	0	0
Question 11a	Of these households how many are currently living in each size of accommodation?	1 bed	total overcrowded			
			of whom severely o/crowded			
		2 bed	total overcrowded			
			of whom severely o/crowded			
		3 bed	total overcrowded			
			of whom severely o/crowded			
		4+ bed	total overcrowded			
			of whom severely o/crowded			
Question 11b	Of these households..... how many are existing tenants seeking a transfer?					
 of whom, the number that are severely overcrowded					
Question 11cand how many are new applicants seeking social housing?	from Private Rented Sector				
		from Owner Occupation				
		Check total (9b+9c)	0	0	0	
			if cell is red it's because the check total differs from the total in E133	if cell is red it's because the check total differs from the total in F133	if cell is red it's because the check total differs from the total in G133	If any of these cells are red please correct as appropriate

Under-occupied households on waiting list and wanting to downsize

12. Under-occupied households on both LA and RSL waiting lists wanting to be re-housed as on 01/04/10		LA waiting list	RSL waiting lists(s)	Total as at 01/04/10
No. of households recorded as under occupied by the Bedroom Standard		Total		
		0	0	0
Question 12a	Of these households how many are currently living in the following accommodation	3 bedrooms		
		4 bedrooms		
		5+ bedrooms		

REGISTER COUNT 25.08.10

STATUS	PRORITY HOMESEEKER	HOMESEEKER	TRANSFER	TOTAL	%
ACTIVE	2251	3599	2358	8208	72.49%
SUSPENDED	913	1026	229	2168	19.15%
INCOMPLETE	15	775	59	849	7.50%
UNDER OFFER	58	4	36	98	0.86%
TOTAL	3237	5404	2682	11323	100.00%

CCY/cm

By email and post

Sarah Hurcombe
Assistant Scrutiny Manager
Planning and Housing Committee
City Hall
The Queen's Walk
LONDON SE1 2AA



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REGENERATION**

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OSRH024

3 September 2010

Dear Ms. Hurcombe,

Planning and Housing Committee : Overcrowding in London

Thank you for inviting me to comment on your letter dated 21 July 2010 in respect of overcrowding in London.

I have set out my response to reflect your numbering:

1. It is important to recognise that the overcrowding in London only applies, in significant numbers to the social rented sector. It is also important to recognise from the GLA's recent study into overcrowding that 64,000 social rented dwellings in London are under-occupied.

Therefore, one of the most significant policy changes should be to make best use of the under-occupied social rented dwellings.

Whilst we note there is some over-crowding in the private rented sector, it is important to relate this to those households potential access to social rented homes and this is further complicated in respect of migrant workers, who frequently cluster in family dwellings.

2. The principle obstacle to increase the supply of larger family homes is both the level of public sector subsidy needed to underpin such delivery for the social rented sector and affordability of large family homes in the private sector.

Again, it is important to recognise the demographic forecasts for London which indicate the need for accommodation for single person households (500,000 out of 700,000, additional dwellings by 2026).



-2-

3. The Mayor's plan to introduce a target that 42% of new social rented homes should be 3 bedrooms or more, will be exceedingly difficult to achieve. As indicated above, the anticipated restrictions on public sector funding will make the delivery of such new dwellings even more difficult than is currently being experienced. Further, the private sector's ability to continue to cross subsidise such provision will add to the burdens currently being faced in light of all the new policy proposals in the draft Replacement London Plan.

It will be totally inappropriate to introduce a temporary moratorium on the building of small homes in London. Not only does this not reflect demographic trends, it will also undermine first time buyers ability to access either shared ownership, intermediate housing or other affordable housing. The age of first time buyers in London is already 34 years.

More policy attention should be focused on making best use of existing stock. The RSL sector auctioned nearly 1,000 homes in recent years, many of which were family dwellings that they could not afford to improve. A greater focus on delivering good quality, single person household accommodation to release family homes that are being multiply occupied would help to increase the supply of family homes for the social sector.

4. The impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs will be to potentially undermine the viability of housing development and could, therefore, impact negatively on the delivery of all housing tenures. It would also undermine the need for the provision of new single person dwellings to meet demographic forecasts and the affordability of homes for first time buyers.

In respect of the supplementary questions attached to your letter, many of these matters will be covered at the forthcoming EIP and, the matters highlighted above, I believe cover many of the questions listed. I would, however, add that St George has built many large family homes for market sale in recent years. The price of such dwellings in London is, however, normally very high due to land and development costs in the capital.

I hope this is helpful.

Yours sincerely,

**London Assembly
Planning and Housing Committee: Overcrowding in London
The Hyde Group Response**

Introduction

The Hyde Group has provided a response to the questions posed by Andrew Boff AM on 21 July 2010. The main points from our response are:

- Building larger family homes will help to tackle the overcrowding in London, however, it may result in fewer social homes being built, as it is not advisable to build family homes at high densities.
- A flat rate on all social housing developments may not result in the best long term outcomes as not all sites will be appropriate for this level of family housing. Targets may be better set on a scheme by scheme basis to meet the needs of local communities, with potentially greater proportions on suitable schemes to offset lower proportions on less suitable schemes.
- Developing larger homes is expensive, and grant rates would need to reflect this policy is to be successful.
- The impact of developing large family homes would have on local services, such as schools, will have to be considered before any policy is implemented.
- Allocations policies which allow overcrowded households access to the newly developed family homes will need to be developed at a local level to ensure that the policy is successful in its aims.
- A target which aims to develop 'three or more bedroom homes' are likely to produce mainly three bedroom properties. Targets for four and five bedroom homes may also be required to meet the needs of overcrowded households.

1) What are your views on the proposition that 'increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding?'

Increasing the supply of larger family homes will certainly help to tackle overcrowding in London. It has been known for some time, and is frequently stated in Local Plans and Strategic Housing Market Assessments that although there is identified housing need for all property types in London boroughs, the presence of overcrowding means that by building larger homes will effectively meet some of the housing need for smaller properties as these will be freed up when larger families move out of overcrowded accommodation.

Many housing market assessments identify a need not just for three bedroom properties, but also for four and five bedroom homes. Setting a target for three bedrooms and above may not achieve the required number of four and five bedroom homes that are required, and targets may also be required for the larger properties.

However, building larger properties alone will not solve the overcrowding problem in London. For example, one significant source of overcrowding is grown-up children

who do not have the means to obtain their own accommodation in the market and are low priority for social housing unless their families make them homeless. Therefore local lettings plans that prioritise young single people or couples, at least one of whom is part of an overcrowded household, for smaller accommodation could also be successful.

Similarly, allocations systems do not always prioritise overcrowding as highly as other priorities, meaning that some of the larger properties may get given to homeless households who are not overcrowded instead. To successfully tackle the problem of overcrowding, simultaneous reform of allocation and lettings policies may be required.

2) What are the obstacles to increasing the supply of larger family homes?

The biggest barrier to increasing the supply of larger homes is cost. Larger homes cost more to build, and although some efficiencies will be found (such as cost per sq m); they take up more space meaning less units will be developed. The extra cost of larger homes will mean that developers may require hire grant rates to ensure the viability of schemes.

It will not always be possible to achieve both high density accommodation and larger family homes. Therefore, a flat rate target may not be suitable for all sites, as particular care needs to be taken in the design of high density accommodation for families. Good practice documents already exist, for example *Recommendations for Living at Superdensity*¹, and *Higher density housing for families: a design and specification guide*² and it is recommended that these are adopted at the same time as any blanket targets.

For larger family accommodation, houses will be more appropriate than flatted accommodation (unless well designed – see above) so sites with lower densities (likely to be houses with gardens) could have higher requirements than those with higher densities. Sites suited to houses may be likely to fall under the 15 unit threshold at which an affordable housing requirement applies, which may be worthy of further consideration. Another possibility would be to require the minimum affordable housing percentage to apply to houses as well as properties as a whole within S106 agreements. Consideration needs to be given to the effect of competition with private developers for larger sites to be provided as 100% affordable housing.

Consideration will need to be given to the infrastructure requirements of an increased number of larger homes. Access to schools, primary healthcare and other amenities (including transport) is often more critical for these households. Concentrations of family homes can also lead to high child densities have been shown to increase incidence of anti-social behaviour. Although this may not have an immediate impact on local communities, it is likely to materialise over time.

Developments which put pressure on local services are likely to be met with resistance by local people. Under the government's new planning arrangements, local communities will be able to block any plans that they do not agree with. The

¹ http://www.designforhomes.org/?act=res_item&id=6

²

<https://www.housing.org.uk/OnlineStore/Default.aspx?tabid=44&action=ECDProductDetails&args=8759>

impact that the new planning arrangements will have on fixed planning targets will have to be considered before they are implemented. There is a real danger that large concentrations of family homes in one area will prove un-popular with some communities.

3) How effective are these measures (42 % social rented homes to be three bedrooms and more; Mayor's overcrowding action plan) likely to be compared with other potential policy initiatives?

If the Mayor sets a target for only three bed homes plus, then it is likely that most of the 42% will be three bed properties. A significant proportion of London's housing need is for four and five bed properties, therefore the policy could lead to an oversupply of three bedroom properties, or families being housed in only slightly less overcrowded accommodation. However, four and five bedroom properties will be even less suitable in flatted / high density schemes.

It is therefore vital that the HCA and other grant awarding bodies continue to assess bids on a grant per person or proportion of total scheme costs basis rather than a grant per unit basis. As mentioned above, larger homes cost more and a system where financial incentives are aligned with policy objectives will not only ensure that minima are adopted where required but that larger family homes are delivered anyway, including four and five bedroom homes.

If lower density developments are more suitable for family accommodation, this may result in the location of family social rented accommodation being skewed towards suburban areas and outer London authorities. Overcrowded households may then be required to move out of their local area, which has proved unpopular in the past because of work and family ties.

Some initiatives are already working well in London, such as: the purchasing of larger homes to meet specific needs; loft conversions to create extra bed spaces; housing options advice to suggest alternative tenures; and rent deposits schemes. However, whilst such schemes are worthwhile, they are unlikely to make a significant contribution overall, and are often expensive to implement.

Policies which encourage under-occupiers downsize their home could also have a significant effect. As this will always rely on voluntary moves, it is necessary to understand what is of value to the various groups that under-occupy. One notable group is older people whose children have set up their own homes. Hyde has worked closely with Lewisham Council's under-occupation team to relocate older people in Downham from 3 bedroom houses into a purpose built block of flats at Dunn Court, Medhurst Drive.

A moratorium on small homes may result in a shortage of such properties, with increasing numbers of single households having no where to live, which may store up problems for the future.

4) What would be the impact of prioritising the building of a greater number of family homes on other aspects of London's housing needs?

Introducing a strict target on the development of larger homes will lead to a reduced number of social homes being built. A 42 per cent target may make it more difficult for housing associations and other registered providers to secure, and fund, sites that

are 100 per cent affordable, which would further reduce the number of social homes that are developed.

Similarly, the Mayor rejected the 50 per cent affordable homes target introduced by the previous administration on the basis that it reduced the overall number of social homes that were developed. A flat percentage target of larger homes for all social housing developments may produce a similar situation, and put off developers from building social homes. For the purposes of consistency, it may be more appropriate to introduce specific targets with each borough on the number of three, four and five bedroom social homes that they can develop over a set period of time.

Prioritising the development of family homes may also lead to an increase in the number of people housed in temporary accommodation, as the overall delivery of new social housing drops.

Dear Michael,

I am writing to you with the London Borough of Hounslow's response in relation to the London Assembly's Planning and Housing Committee review into overcrowding levels in London's social rented housing. Please note that our response is marked confidential.

I have provided below the requested details of our borough and views on the four questions and the additional related questions.

The most up-to-date information on the waiting list for social rented housing in terms of numbers and size of home required

As at 1st April 2010, 12,212 households were registered on the London Borough of Hounslow’s Housing Register.

Of which, 5,638 households require a 1-bedroom property, a total of 3,591 households require a 2-bedroom property, 2,261 require a 3-bedroom and 722 household require a property with 4-bedrooms or more.

Estimates of the scale and nature of overcrowding in social rented housing in your borough

London Borough of Hounslow Housing Market Assessment

The London Borough of Hounslow: Supporting Report (2008) provides the background detail for the London Borough of Hounslow Housing Market Assessment (2008). The levels of overcrowding, using the bedroom standard, have been studied using data from the housing needs surveys/assessments (Fordham Research Hounslow household survey (2008)).

The Supporting Report details that 8.8% (equating to 1,779 households) of households in social rented accommodation (total social rented stock of 20,210 in Hounslow) within the borough are overcrowded.

Overcrowding in the London Borough of Hounslow Stock

The table below illustrates the baseline date collected 1st April 2010 indicating those households, in accordance with the Council’s Allocation Policy who are overcrowded (please note that none of these households are statutorily overcrowded) within the Council’s own social rented housing stock (these figures do not include those households who are living in social rented accommodation owned by Registered Providers). Please note that at present the Council’s Allocation Policy doesn’t differentiate between overcrowded and severely overcrowded but these households have been separated for your information.

Total Number (at 01/04/2010)	Number of Overcrowding Registered (requiring one	Of which, are severely overcrowded (requiring two
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	extra bedroom)	extra bedrooms)
	604	87
Occupying studio and 1 bed	73	12
Occupying 2 beds	467	63
Occupying 3 beds	64	12
Occupying 4 beds	0	0
Occupying 5 beds or more	0	0

Details of the borough's housing allocation policies and priorities

Housing Allocation Policy

Under the Council's current Allocation Policy (2007), households are placed in appropriate bands according to the information that has been provided in the housing application form and in relation to their housing need. Outlined below are the priority bands and details of how overcrowded households are assessed in line with the Allocation Policy.

The four priority bands are:

- Band A (emergency and extreme need to move)
- Band B (urgent need to move)
- Band C (identified housing need to whom the Council is required to give reasonable preference)
- Band D (all other members)

Those households who are statutorily overcrowded as defined in Part X of Housing Act 1985 would be awarded Band B. Overcrowded households (unless statutorily overcrowded) will be awarded in Band C. These Band C households will be assessed as overcrowded if the households do not have the following minimum provision:

- For co-habiting couples, 1 bedroom
- Two children of the same gender, 1 bedroom, unless 1 child is aged over 10 years and there is an age gap of 5 years or more
- For different gender siblings where at least 1 child is aged over 7 years they should not have to share a room. The bedroom standard is 10 years of age
- For each independent adult (18 years and over), 1 bedroom. However, siblings of the same gender, who are 18 years of age or over and living as part of a larger household, will be expected to share. For example, if the resulting bedroom need is 4 or more bedrooms, it is expected that adult siblings should continue sharing

In addition, for the purposes of assessing overcrowding, a second reception room will generally be deemed as available for use as a bedroom, box rooms which could reasonable be used by a child will count as a single bedroom and single persons occupying studio flats will not be deemed overcrowding.

Review of Housing Allocation Policy

Following a Council Scrutiny Review a complete revision of Hounslow's Allocation Policy (2007) within the choice based system was undertaken in 2009 and a revised allocations policy was proposed but not implemented. This revised policy is itself now being reviewed against the Fair and Flexible guidance and a further revised policy is likely to be adopted and implemented late 2010 or early 2011. One of the aims of the revised Allocations Policy will be to enable the Council to give additional priority to those households who are the most severely overcrowded and help move those people who are under occupying family homes and would like to move to smaller homes thereby releasing larger accommodation.

Housing Strategy 2010-2015

The London Borough of Hounslow's Housing Strategy 2010-2015 sets out five key objectives as follows:

1. Ensuring well managed and good quality social housing;
2. Improving housing standards in private housing, particularly the private rented sector;
3. Preventing Homelessness and reducing dependence on social housing;
4. Increasing supply of affordable housing for families and promoting home ownership and
5. Working together to build healthy, safe and sustainable communities.

Addressing overcrowding as well as under-occupation are key priorities for the Council. Within the first objective of our Housing Strategy are actions associated with making the best use of our stock including the following action:

'To alleviate overcrowding by proactive work with both overcrowded and under-occupying households and offering a range of housing solutions. We aim to halve the number of severely over crowded tenants by 2016 and reduce under occupation by two thirds'.

The Council also views increasing the supply of affordable housing for families as a strong priority as identified in objective four. Within this overall objective are associated actions including an action to 'Promote greater supply of family housing'.

Overcrowding Pathfinder

In 2008 Hounslow became an Overcrowding Pathfinder and received £100,000 funding from CLG in 2008/09 and 2009/10 and a further £50,000 funding to date in 2010/11. This money is being used to fund two Overcrowding & Under Occupancy Project Officers who work specifically to support and find solutions for overcrowded households and support and encourage under-occupiers to move to smaller properties. These Officers have set up a 'Change-In-Space' Overcrowding and Under-Occupying Scheme offering a variety of options for households including the Trading Places Scheme, which offers financial incentives for social rented tenants (whether Council, our ALMO, Hounslow Homes or Registered Providers tenants) to downsize to a smaller property. The Officers also visit overcrowded families to offer practical suggestions to give them more usable space in their existing home, assist adult family members (e.g. adult children) to find their own accommodation and help these households to assess the moving option that best suits them.

Extensions and Conversions

The Council is also committed to carrying out a programme of extensions and loft conversions to make larger family sized accommodation using £1million from the Council's Affordable Housing Fund and money from

London Housing's Board Targeted Funding Stream allocated to West London. The £1million allocated from the Council's Affordable Housing Fund has focused on providing conversions and extensions to the current homes of overcrowded tenants living in houses. This programme has been very popular and it has been agreed to add a further £400,000, funded from Housing Revenue Account. In total, over 30 extensions and conversions have been completed or are in progress to date.

1. What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problem of more Londoners in overcrowding”?

Increasing the supply of larger family homes is an important measure to assist in tackling the problems of overcrowding but as a measure alone it will not effectively address the matter and should not be viewed as a solution in isolation from other initiatives.

Recent announcement relating to the reforms to the Local Housing Allowance, including caps on the amounts payable will increase the problem and reduce the options to meet the needs of larger families in the private rented sector and will have the effect of increasing pressure on Registered Providers to house families, particularly those very large families.

It is important to consider a range of interventions and initiatives including: maintaining funding for officers to work specifically to support and find solutions for overcrowded households and support and encourage under-occupiers to move to smaller properties, making effective use of existing social rented housing stock (both Council and Registered Providers), providing conversions and extension programmes to social rented properties and increasing opportunities for social tenants to move into alternative suitable accommodation including intermediate tenures. Due to changing demographics and increasing numbers of older persons, housing options for this client group must be considered and support provided. This would in turn enable more under-occupied accommodation to be made available.

In addition to housing based solutions, access to employment and training must be made available to enable adult members of overcrowded households to move on.

Further to this, the challenges to delivering increased provision of family housing, for example, availability of HCA grant funding and development viability, must be considered and addressed. These matters are discussed further in the questions below.

2. What are the obstacles to increasing the supply of larger family homes?

There are a number of obstacles to increase the supply of larger family homes, the main challenges are summarised below:

- Land owners expectations regarding land values creates pressure to build more smaller homes;
- Affordable housing requirements in planning policy based on units rather than habitable rooms focuses on the number of affordable housing units delivered;
- Delivering higher percentages of larger units can have a negative impact on development and affordable housing viability;
- Family housing can be difficult to provide because it triggers other Section 106 contributions such as school provision which add extra cost to a development and possibly make the development unviable;
- Larger homes cost more to build and manage and the funding regime has not recognised this

sufficiently. HCA grant funding is based on a level of grant per unit rather than per person therefore no additional money is secured for larger units. Grant levels are insufficient to make developing family sized homes, which are more expensive to build and manage, economically viable;

- Difficulties and unwillingness from developers to deliver three-bedroom or larger units on high-density sites;
- Family housing could be provided at higher densities but the required amenity space and other facilities (which are obviously important and necessary) are expensive or lacking on new developments;
- Lack of available of land or suitable sites for high proportions of larger family homes;
- Registered Providers are not always involved early enough in the planning process to influence the size of the affordable housing element of new developments;
- Difficulties in ensuring that the models for intermediate products e.g. New Build HomeBuy are affordable for family sized units in particular. It can be difficult to make shared ownership models (i.e. the % equity share purchased and rent on the unsold equity plus the service charge element) stack up for the Registered Provider in terms of their loan arrangements and for the customer to afford;
- Service charges on intermediate products can make the intermediate product unaffordable as managing agents charge per habitable room and
- Some reluctance from Registered Providers to build family units due to child density or management issues.

3. The Mayor has plans to tackle overcrowding in social rented housing by:

Introducing a target that 42% of new social rented homes should be three bedrooms or more; and

Implementing the Mayor's action plan to reduce social housing.

How effectively are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on building of small homes?

Introducing the 42% target and implementing the action plan are likely to be more effective than measures such as introducing a temporary moratorium on building of small homes. New developments including those delivering affordable housing should address the housing need of the borough including the need for a range of property types and sizes and seek to create sustainable communities.

Delivering only larger homes for a set period of time could result in difficulties in addressing housing need for smaller homes and identifying new suitable smaller properties to assist with tackling under-occupation, which should be considered in conjunction with overcrowding.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

This could potentially impact on the delivery of pipeline schemes and schemes that have recently secured planning permission requiring grant funding that have not been negotiated on the basis of 42% larger homes but will provide valuable new affordable homes for the borough to address housing needs for all household types.

Prioritisation of larger homes could stall development sites and reduce the overall number of affordable homes being delivered thereby increasing the overall level of housing need within London. Over-crowding is an important housing matter to be addressed but consideration to the range of housing needs must be given.

Challenges to increasing supply

What are the issues surrounding housing building economics on increasing the supply of larger family homes?

Increasing supply of family homes will impact on housing building economics by:

- Increasing build costs;
- Increasing land costs as larger sites will be needed;
- Increasing Section 106 contributions;
- Increasing in amenity space requirement and
- Reducing Gross Development Value.

In addition, there may be difficulties in secure sufficient finance and making the loan arrangements stack up to deliver increased supply of larger family homes.

What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

A reduction in the housing budget is likely to reduce the provision of new social rented housing and increase over-crowding within existing stock. It is likely to result in more households being directed into the private sector despite this tenure not being truly affordable for those households. This would in turn increase the demand on the housing benefit system.

Mayor's approach

To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?

Affordable housing should be considered on habitable room basis rather than calculated by units.

Greater certainty about the availability of HCA grant funding would encourages developers to invest in affordable housing and therefore support delivery of more family housing.

What other options are available to the Mayor aside from his 42% target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

The Mayor could consider specific housing need based targets for three-bedroom, four-bedroom, five-bedroom and larger properties within the overall 42% target. In our experience, a target for the delivery of three or more bedrooms properties will assist in increasing the number of three-bedroom properties but developers and Registered Providers very rarely come forward with development proposals including properties with four or more bedrooms.

Other measures for increasing supply?

How can variable housing grant rates encourage the provision of more family housing?

Variable grant rates could encourage increased provision if variable grant rates provide sufficient funding to make delivery of family homes more economically viable.

In addition, flexibility to allow grant per person rate to be considered rather than purely grant per unit rate would assist in increasing the provision of family housing. It is difficult to achieve expected grant per unit (e.g. £100k per unit) on schemes delivering a high proportion of family housing and therefore flexibility to look at grant per person rate would encourage the provision of more family housing.

What other ways are there to increase the supply of family homes?

- Deliver high proportion of family housing on HCA-owned sites/other public sector sites.
- Release of public sector surplus land for housing.
- Affordable housing requirement based on habitable rooms rather than units.
- Lower equity stakes for intermediate homes but also need considering the rental and service charge element that can make intermediate homes unaffordable.
- Encourage landowners to take a long-term view of land value and encourage landowners to lease land to developers but delay taking money for the land until the housing stock is sold.
- Encourage family sized housing on small infill sites.
- Encourage Registered Providers to use RCGF to fund family homes.
- Encourage Registered Providers to purchase family homes at nil grant for their transfer applicants i.e using their own resources.
- Local authorities to prioritise family homes when using Section 106 contributions for new additional affordable housing.
- Prioritising a % of affordable housing units on new developments through Letting Plans for under-occupiers.
- Cash-incentive schemes to assist home purchase through low-cost home ownership or low-cost market housing.
- Encourage Registered Providers Managing Boards to be more flexible in terms of loan arrangements and to deliver multi-tenure developments and deliver individual local authority priorities.

What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

The market has an important role in providing more family homes and Local authority Housing Development and Regeneration Officers should be working closely with Planning Officers (Development Control and Planning Policy) to support and encourage both private developers and Registered Providers to increase delivery of affordable housing including family size homes.

Greater certainty about the availability of HCA grant funding would encourages developers to invest in affordable housing and flexibility over the grant rate would encourage more family housing.

I hope that this information is clear. However, please do not hesitate to contact me if any clarification is needed or you have any further queries.

Kind Regards,

3rd September 2010

Dear Sarah

Re: Planning and Housing Committee: Overcrowding in London

I write in response to your letter of the 21 July requesting information on overcrowding in Harrow and related questions to inform your review.

Harrow in Context

The London Borough of Harrow is an outer London borough lying about ten miles north-west of central London. Its popularity as a residential suburb together with limited scope for development is a major factor in the affordability issues faced by its residents.

Of the 84,187 dwellings in Harrow 6% are council properties, 4.4% are housing association and 89% are privately owned of which 12% are rented privately. These levels of home ownership are much higher than the national average (72%), which puts extra pressure on the availability and affordability of rented stock.

Our 2006 Housing Needs Assessment identified that 9,964 (12.1%) of the borough households live in unsuitable housing. The most common causes are overcrowding (35.6%), housing mobility/health problems (33.5%) followed by expensive accommodation (26.8%). Of the 9,964, some 25% can have their needs met without having to move through housing support, adaptations to their property and work to bring their properties up a decent standard. Those most affected are social housing renters (26.4%), owner-occupiers with a mortgage (9.2%); two adults and two children households (15.9%) and lone parents (20.3%)¹.

Table 1 (taken from the 2006 Housing Needs Assessment - HNS) below shows the identified housing need in Harrow by tenure and confirms that there is a considerable need for affordable housing of all sizes in the borough including large family housing.

¹ LB Harrow Housing Strategy 2007-2012

Tenure	1 bedroom	2 bedroom	3 bedroom	4+ bedroom		Total
Owner Occupation	-397	520	-859	128		-608
Affordable Housing	293	1302	830	400		2825
Private Rented	-456	-873	-367	-121		-1817
Total	-560	949	-396	407		400

(-Surplus)

The anticipated supply of social rented housing by bed size for this year and next year in Harrow is as follows.

			Social Rented - Bed size				
			Studio	1 bed	2 bed	3 bed	4 bed plus
2010/11	220		0	61	58	40	61
		%	0	27.7	26.4	18.2	27.7
2011/12	137		0	22	25	46	44
		%	0	16.1	18.2	33.6	32.1

The low levels of large family housing mean that waiting times are much longer than smaller properties. Priority is therefore attached to the provision of family sized social rented housing where deliverable in the borough.

Overcrowding in Harrow

The table below shows a comparison between the numbers of bedrooms needed against current bed sizes for all households on the housing register on the 1 April 2009.

37% of Choice tenants (existing social housing tenants applying for transfer) were in need of a bedroom and 9% were in need of 2 bedrooms ("severely overcrowded").

Current Bedrooms	Bedrooms Needed				Total	%
	One Bedroom	Two Bedroom	Three Bedroom	Four Bedroom +		
One Bedroom	1118	393	54	14	1579	34
Two Bedroom	134	919	362	65	1480	32
Three Bedroom	132	214	671	340	1357	29
Four Bedroom +	40	19	24	155	238	5
Total	1424	1545	1111	574	4654	
%	31	33	24	12		

Source: LBH data – all households on the housing register (90% with bedroom known)

We are in the process of updating our information as at 1 April 2010 which will be available soon.

Harrow Housing Allocations

Harrow uses a choice based lettings scheme called LOCATA which uses bands of housing need. Depending on circumstances and the applicant's current housing situation they will be banded in priorities. The four priority bands are:-

- Band A (emergency and top priority members)
- Band B (members with an urgent need to move)
- Band C (members with an identified housing need to whom the Council is required to give reasonable preference)
- Band D (all other members).

LOCATA members will be deemed to be living in overcrowded conditions if members of their households do not have the following minimum provision:-

- Co-habiting couples – 1 bedroom
- Two siblings of the same sex, less than 5 year age gap – 1 bedroom
- Independent adult 18+, not part of larger household – 1 bedroom
- Children of opposite sex if one is 7+ years old should not have to share a bedroom
- Children of same sex if one is 10+ years old and there is a 5+ year age gap should not have to share a bedroom

Eligible members can make a limited number of bids, per edition, for properties advertised through the Locata system. All eligible bids for each property are placed into priority order. Priority is decided first by band and second by date order within each band, thirdly by registration date and finally by random selection.

Where a property has been advertised to give preference to a mobility group, bids from these applicants will be prioritised in band order above bids from members who are not in that mobility group. Every bid is assigned a random number when the bid is made. This number is used to resolve ties, the higher number gets priority.

The full allocation policy can be found via the following link:

http://www.harrow.gov.uk/downloads/file/6657/letting_and_transfer_scheme

1. Our views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding?”

We agree that this, amongst other complementary initiatives, does help to tackle overcrowding provided they are built to adequate space standards and are located in sustainable communities eg have access to schools, open space, public transport networks etc.

In 2010/11, Harrow are currently anticipating that 45% of social housing completions will be 3 bed +. This figure has grown steadily since 2008. The primary reasons for this increase in family sized housing coming forward is a mixture of the influence of housing and planning policy (locally and London wide), partnership working and funding from the HCA which considers value for money on a per person basis as well as per unit basis in order to enable the financial viability of schemes to work out in an area of high residential land values.

2. Obstacles to increasing the supply of larger family homes

In Harrow the main obstacles to increasing the supply of larger family housing are:

- Land Values – In Harrow, competition for limited residential development opportunities puts upward pressures on land value and encourages the development of smaller homes
- Site suitability – lack of large low density residential sites in Harrow and increase in higher density town centre development which is less suitable for family housing
- Grant Levels – Grant funding availability for the delivery of larger units especially when vfm considered on a per unit basis
- Despite encouragement from the Council, developers do not involve RSLs at an early enough stage to influence the mix of units on S106 sites. We find that in some instances, our partners acquire sites with an existing consent in order to avoid risk and the time consuming planning process

3. How effective are measures to introduce targets for new build 3 bed plus social family housing and actions to reduce overcrowding in social housing compared to other policy initiatives such as introducing a temporary moratorium on the building of small homes?

In Harrow, the target for family sized unit provision in the social rented sector is actually much greater than the Mayor's target – 57% - based on demand as assessed in the 2006 housing Needs Assessment.. Whilst we are not meeting our own target we have shown an improvement since 2008/09 moving from 25% family sized that year to an anticipated 45% this year in the social rented sector and therefore are likely to exceed the Mayor's target. Policy and funding are clearly key to achieving such targets. We believe that our local targets and those of the Mayor have been key to improving the delivery of family social housing.

We also agree that building new homes will never be enough to tackle the serious overcrowding problem. Other initiatives that we have introduced, some supported by the Mayor's targeted funding stream, such as conversions/extensions to existing social housing, schemes offering incentives for under occupiers to move or encouraging social housing tenants to move to larger homes in the private rented sector and encouraging empty homes to be brought back into use are equally important in offering choice and making the best use of all available opportunities.

The review asks also about the possible implications of introducing a temporary moratorium on the building of smaller homes. Introducing such a measure in an area such as Harrow may be detrimental to the supply of overall housing within the borough. Financial viability and local land value would be key in such a scenario. A private sector developer will not proceed with a scheme which is financially unviable due to an enforced housing mix and equally a scheme will not be financed where a development is not returning a sufficient profit in order to minimize lending risk. On the affordable housing side of the argument, sufficient public funding needs to be available to ensure that a Housing Association or indeed the council can support a scheme which can proceed on the required terms for that organization.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

The latest Housing Needs Assessment and draft SHMA demonstrate a continued need for smaller units in the borough as well as larger units across the open market (non private rented) and affordable housing tenures. A reduction in supply will reduce affordability and lead to a further reduction in the number of first time buyers able to access market housing in London as well as reducing opportunities for those looking to downsize from larger units to newer cost efficient housing. In particular the financial viability of sites at a local level would need to be tested.

The sustainability of a greater number of larger homes especially in high density schemes would need to be carefully considered and standards enforced in relation to dwelling size, amenity space and access to schools and other services. A one size fits all policy is unlikely to be viable or deliverable.

Added to these considerations should be the recently proposed changes to the Housing Benefit subsidy. Any reduction in the supply of smaller units to the market might have the effect of pushing open market rents beyond the upper cap proposed in the new measures and thus causing further affordability problems in the capital.

I trust that this response provides the information you have requested and please let me know if you need anything further.

Yours sincerely

Appendix – Supplementary Questions on Overcrowding

Challenges to increasing supply

The economics of delivering larger family homes and budget reductions.

As discussed in the main response document, land values and piecemeal site assembly on brownfield land can often necessitate high density residential developments in London. This is also true to an extent within Harrow.

The drive to be more environmentally sustainable is also a factor in the requirement to deliver higher density development as per the GLA housing density matrix which advises on appropriate density levels in accordance with public transport accessibility.

All of this can result in multi storey developments which are largely unsuitable for family sized accommodation both from a developer's viability perspective and also sometimes from a design, accessibility and amenity point of view.

If a blanket moratorium on the development of smaller units was brought into play, it may result in developers land banking sites which they have previously acquired on the basis of developing at higher densities.

With regards to the likely impacts of budget reductions on the provision of social rented housing in London, it is likely that whatever funding is made available will be channelled into the delivery of larger social rented units where this is a priority. The delivery of family sized affordable housing requires the largest subsidy in general as this is where the largest gap exists between development cost plus land and achievable rental income. When undertaking financial viability assessments for new schemes where there is nil grant input the level of affordable housing that is viable in Harrow falls from around 30-35% to 20% and below on average.

If the level of subsidy is to fall still further, it is likely that the use of publicly owned land and various other financial initiatives will be required to offset development costs where practicable. Other public funding constraints mean that local authorities will be less able to contribute either land or grant direct to the delivery of affordable housing. Overall the housing budget reductions will therefore mean less new social rented homes being built in London.

Mayor's approach

The Mayor has set out in August 2010 that he intends to roll out Devolved Delivery Arrangements to all London Boroughs from April 2011. Devolved Delivery Agreements should empower the boroughs in their place making and regeneration roles, drawing together place-making themes such as, employment, infrastructure, transport, economic regeneration and city centre development. They should also be the key to unlocking the potential of boroughs to contribute more to housing delivery, so delivering more affordable housing to meet London's needs, in particular social rented housing.

In Harrow the priority for family sized homes means that investment would be directed at schemes that deliver family homes. However the anticipated reductions in investment will mean overall a reduction in the delivery of affordable housing.

Other Measures to Increase Family Sized Housing Supply

The market has a definite role in the future provision of family sized homes but this must be encouraged by greater certainty in the planning system as to what will be expected in each geographical area. Local Development Frameworks and Housing Strategies must provide a long term co-ordinated direction for developers so that requirements for a much greater level of family sized housing can be factored into land values.

In terms of variable grant rates for affordable family sized housing delivery, there may be a possibility that offering incentives to provide larger affordable housing units may entice Housing Associations (and then in turn open market developers) to actively plan for the provision of larger units from the outset of scheme proposals. Where there is certainty that smaller units will not be grant funded or will receive funding below a breakeven position, this may be sufficient to encourage larger more 'profitable' affordable units which enable a breakeven position.



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Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

No. Item

1. Introduction

There is a high level of overcrowding in East London and data received from Local Authorities and RSLs in March 2010 suggests that there were around 36,500 families living in overcrowded conditions in East London. Of these, over 6,000 households live in severe overcrowded conditions, that is households lacking two or more bedrooms.

Over 1,685 under-occupiers are applying to move into smaller, manageable homes from their current social homes.

In response to this, East London Local Authorities have introduced a Borough based pathfinders and sub-regional initiatives to tackle over-crowding.

We have responded to your questions in detail below.

2. Qu. 1 What are your views on the proposition that ‘increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding’?

- a. The shortage of housing is the principle structural cause of our housing crisis, and the root of many related housing challenges. Quite simply, increasing supply remains the number one priority for East London and the London Plan explicitly recognises the importance of boosting housing supply in the sub-region to meet the Capital’s economic objectives.ⁱ
- b. East London has some of the highest levels of over-crowding in the UK. Increasing the supply of family sized accommodation is vital to reduce over-crowding. Managing stock to achieve the best use of stock is also crucial in reducing overcrowding and is addressed later in this response.

Cont.

Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

3. Qu 2. What are the obstacles to increasing the supply of larger family homes?

- a. There are some non-financial barriers to increasing supply for example, planning and building regulations are complex and overlapping.ⁱⁱ However, finance is the number one issue – both the provision of subsidy to deliver affordable housing and the availability of mortgage finance to first time buyers. This is the dilemma that East London must now face: demand for affordable housing rising inexorably just as our capacity to deliver it is at its most constrained.
- b. At present our projected levels housing supply will not meet the scale or profile of demand. Even as total housebuilding recovers and accelerates the state of the public finances means – beyond a spike in completions in 2010-12 due to the current round of fundingⁱⁱⁱ – the level of new build affordable housing is likely to decelerate. This is compounded by the increase in supply of one and two bedroomed flats at the expense of additional family housing.^{iv}
- c. The draft East London Strategic Housing Market Assessment estimates that a third each of the future requirement for housing will be in the market, intermediate and social rented tenures. So two thirds of additional homes need to be affordable, compared with 40% in London as a whole.

4. Qu 3. The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target at 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to overcrowding**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

- a. Introducing a target for larger homes is a positive step for tackling overcrowding. However, to enable local flexibility, the Mayor should allow new social housing developments to provide *at least* 42% of houses with 3 or more bedrooms. East London has adopted a local target that 50% of new social rented accommodation has 3 or more bedrooms.
- b. Introducing a moratorium on the building of small homes would not help with tackling overcrowding as it would significantly distort the market delivery of new homes. Large new schemes tend to be delivered by the private sector and with mixed tenures. On these schemes the private homes are generally smaller and built for market sale. Restricting the development of these homes could lock the delivery of the social housing which is provided at those schemes.
- c. The target to halve severe overcrowding by 2016 is welcomed. However, East London believes this should be a minimum reduction. The impact of severe overcrowding on family life and child development is well documented in the Mayor's Overcrowding Action Plan and so we should be ambitious in our efforts to reduce severe overcrowding.

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Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

4. Qu 3. The Mayor has plans to tackle overcrowding in social rented housing. How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes? Cont

- d. The associated target of achieving 12,000 under occupation moves by 2016 should contribute to achieving the target of reducing severe overcrowding.
- e. There are currently over 1,685 under-occupied households on Council or RSL waiting lists, a potentially significant resource for the sub-region in tackling homelessness and overcrowding.^v
- f. Under-occupation moves to date are achieved through a range of interventions which have a cost. Under-occupation officers provide a hand-holding approach which assists under-occupiers to move into more manageable accommodation. This releases a larger home. Examples of where this approach has ensured an under-occupation move are provided at Appendix 1.
- g. Achieving the Mayor's targets will require additional funding through 2011-12 when the Pathfinder funding ends. The Pathfinder projects directly influenced nearly 200 under occupation moves in 2009-10. The case studies provided in the Appendix demonstrate the benefit of a hand-holding approach. The cost of these moves is a small fraction of the cost of providing a new home.
- h. In addition to this hand-holding approach, joint working between different landlords can achieve chain moves so that larger homes are released.
- i. *East London calls for the Mayor's target to be varied so that 'at least 42% of all new social housing contains 3 or more bedrooms'.*
- j. *East London calls for the Mayor to consider continuing the funding to the Pathfinder authorities in order to meet the target number of under-occupation moves and reduce severe overcrowding.*

Cont.

Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

5. Qu 4. What would be the impact of prioritizing the building of a greater number of larger homes on other aspects of London's housing need?

- a. The issue of over-crowding is more acute in inner London, with households in Tower Hamlets now the most overcrowded in the UK, the rate had already risen significantly between 1991 and 2001.^{vi} The draft East London Strategic Housing Market Assessment finds that nearly half of all households in housing need are overcrowded. Reducing overcrowding would address the biggest cause of housing need in East London.
- b. Overcrowding is particularly acute in East London for several reasons. Many of our homes, particularly in inner London, are relatively small. The situation is compounded by a severe shortage of family-sized new homes. There are also significant concentrations of larger households in certain areas (and often in certain ethnic groups) that buck the long-term trend towards smaller household sizes. Since 2001, privately rented housing has seen the biggest rise in overcrowding, reflecting its role as the most likely tenure for migrants and students.^{vii}
- c. Building new smaller homes which are targeted at under-occupiers can assist with reducing under-occupation. RSLs and Local Authorities can make better use of their existing stock through promoting chain lettings and supporting under-occupiers to make the move. More work needs to be done in this area to free up valuable larger homes. But in order to eradicate overcrowding, a greater supply of larger housing will remain imperative.

Challenges on increasing supply

6. What are the issues surrounding house building economics on increasing the supply of larger family homes?

- a. The London Strategic Housing Market Assessment and the draft East London Strategic Housing Market Assessment both show that the biggest demand for larger units is in the social sector. This presents a challenge for house-building economics as the most expensive form of new housing (larger homes) is in most need of public subsidy.
- b. As discussed above, the overall delivery of new homes needs to continue in order to achieve an increase in larger home provision. Larger homes can be provided on schemes where some smaller private homes are also provided.

Cont.

Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

7. What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

- a. Reducing the budget available for delivering new social homes will reduce the delivery of new social rented housing in London.
- b. Capping Local Housing Allowance rates is also likely to increase over-crowding. There are three factors that result from these changes that are likely to increase levels of overcrowding: the removal of the 5-bed LHA rate will mean that very large households will be forced to move to 4-bed (or smaller) homes; in order to remain in a certain area some households could seek cheaper and smaller accommodation which will inevitably lead to overcrowding; and, our efforts to reduce overcrowding will be undermined by a shortage of private-rented stock which meets the rent requirements under the new regime.
- c. In addition, capping Local Housing Allowance rates could increase the pressure on providing social rented accommodation.

Mayor's approach

8. To what extent can the mayor's investment plans be altered to increase the proportion of family sized homes?

The Mayor could target investment at larger family homes both social rented and intermediate. Increasing the income threshold for eligibility for intermediate housing in the Mayor's Housing Strategy increases the market for intermediate homes but therefore decreases the number of low-income households who are likely to benefit from moving into intermediate home ownership. As the need for larger homes is concentrated in the social and intermediate sector, the Mayor could focus his investment at this level.

9. What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

The action plan sets out a wide range of initiatives to reduce over-crowding. The Mayor should also remain committed to assisting under-occupiers into more manageable homes through hand-holding support. This approach is set out above and with details in the Appendix.

10. How can variable housing grant rates encourage the provision of more family housing?

If social housing grant was provided per person rather than per unit, there would be more incentive for landlords to build larger homes.

East London calls for funding decisions to be on the basis of grant levels per person, not per unit. This would allow higher grant for larger homes.

Cont.

Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

11. What other ways are there to increase the supply of larger family homes?

The Mayor could investigate alternative funding mechanisms for family sized homes for example: Community Land Trusts and nil grant schemes.

12. What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

The London Strategic Housing Market Assessment and the draft East London Strategic Housing Market assessment have both found that the demand for larger homes is mostly in the social and intermediate tenures.

ⁱ GLA, [The London Plan](#).

ⁱⁱ The Commission for Architecture and the Built Environment (CABE), [Who Should Build Our Homes? Six experts challenge the status quo](#), 2009.

ⁱⁱⁱ Homes and Communities Agency (HCA) [National Affordable Housing Programme \(NAHP\)](#) received a boost of over 12,500 homes as part of the previous Government's housing supply stimulus package.

^{iv} DCLG, [Live table 254: Permanent dwellings completed by house and flat, number of bedrooms, tenure, in London](#). In 2008/09 in London the following percentage of completions were: 1 bedroom (23%), 2 bedroom (64%), 3 bedroom (8%) and 4+ bedrooms (5%). In 1991/2 the figures were: 1 bedroom (38%), 2 bedroom (37%), 3 bedroom (17%), 4+ bedrooms (8%).

^v DCLG, *Local Authority P1E returns*; Local Authority overcrowding monitoring forms, 2009-10 Q4.

^{vi} DCLG, *Local Authority overcrowding data forms*, submitted to CLG 2009-10 Q4; Office for National Statistics (ONS), [Census 2001](#).

^{vii} *Ibid.*



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Appendix 1

Response to the London Assembly Planning and Housing Committee Review: Overcrowding in London

LB Barking and Dagenham

One officer specifically visits all tenants who have spare bedrooms and who have expressed a wish to move into a more manageable, smaller property. This officer visits tenants to find out more about their needs.

One tenant, solely occupying a four bedroom home expressed an interest to move to a smaller property. An offer was made to him in 2004 but he didn't respond to this or subsequent review letters. In 2009, it was apparent that the tenant was experiencing difficulty maintaining his home. The property had fallen into disrepair. Concerns were raised for the tenant's health and his rent account had begun to accrue arrears.

The officer provided immediate advice and support in relation to the tenant's present housing need, and to effectively arrange a seamless transition to a new home. This had to be dealt with in a sensitive manner, helping the tenant to replace essential living items which had been damaged as the property had fallen into disrepair.

Co-working with other departments ensured appropriate resolution. The tenant has since moved to a two bedroom home. The Tenancy Sustainment Team will continue to monitor the tenant's capability to manage his new home, intervening with appropriate advice and support when necessary.

The tenant said "If I had this level of support before, I would have moved long ago".

Barking and Dagenham have found that providing this 'one-to-one' support is what really makes the difference in facilitating moves of small households.

LB Hackney

LB Hackney assist applicants who are under-occupiers but want to be housed separately, by splitting up the household and providing two separate tenancies, and in some cases, at management discretion, 3 separate tenancies for applicants in 3 bedrooms and above.

For example, one elderly (75 years old) under-occupier in a 4 bedroom house wanted to move into sheltered housing but had two adult sons at home, both in their early 40s. LB Hackney carried out a home visit and explained the under-occupation scheme and available assistance. The applicant was referred for sheltered housing and accepted a property, once she accepted; LB Hackney identified two separate one bedrooms for the two sons and as a result received the 4 bedroom void.

OSRH029

London Assembly's Planning and Housing Committee:
Overcrowding in Social Housing in London
A Note by Christine Whitehead, Department of Economics, LSE

I am sorry that I have not had the time to provide a detailed evidence based response to your question. I therefore provide a short note raising issues related to your four questions concentrating on the sources of the problem in social housing and whether they imply the need to increase the new supply of large units.

1. *The nature of the overcrowding problem in social housing in London*

Overcrowding in the social rented sector arises mainly from the fact that, for many, household size increases after the initial allocation and there is very limited capacity to move to larger accommodation when these changes occur. In relatively rare instances initial allocation may itself generate overcrowding.

The position is worse in London than elsewhere in the country because initial allocations are rarely above minimum room requirements for household circumstances at the time that the household moves in. In this context for instance only 10% of two bed lettings were made to single people or childless couples between 2006/7 to 2008/9 in London as compared to 40% in the rest of the country.

Overcrowding is also a function of the mix of household types that are accommodated in London which has a generally young population with larger proportions of those of child bearing age than elsewhere in the country. This implies that the probability of the size of the household increasing is higher in London than elsewhere.

Finally overcrowding in the private rented sector, living with family and friends and homelessness are all more important reasons for priority re-housing and will include large proportions of those whose household size has not yet stabilised.

However:

- (i) Household sizes decline as well as increase – so large proportions of households will be living at lower than initial densities. Such households will have little or no incentive to move to smaller accommodation especially given the rent structures in social housing. They will also have little capacity successfully to request a move given the difficulties landlords face in managing transfers.
- (ii) Those households who do become overcrowded will not usually continue to be overcrowded for the rest of their lives. There are of course circumstances where partners or additional generations move in to a household but the much more usual picture is of a relatively short period of overcrowding followed by quite rapid decline in density of occupation. But when this occurs, there is rarely either an incentive to downsize or the managerial capacity to organise such transfers.
- (iii) As importantly, on GLA figures, although the numbers of social tenant households that are overcrowded has been increasing rapidly – in part because of the silting up of the sector the numbers in the private sector are higher. So there is a strong case for concentrating on improving access to social housing as well as simply concentrating on addressing the problems of those already accommodated, however inadequately.

The reasons why overcrowding occurs among established tenants suggest that the answer is likely to lie more in managing the stock more effectively. The suggestions in the Mayor's Action Plan are all desirable but cannot expect to be fully successful. In particular as stated above there are few incentives to social tenants to downsize – especially given what is currently on offer; probably even less for other authorities outside the capital to help households to move outside London; and little private housing which is both affordable and meets standards; and much of the housing stock especially in inner London cannot be extended. All are worth trying – but it will need more fundamental changes in rental policy and tenure security to modify the position significantly.

2. Do we need to concentrate on expanding the supply of larger new social dwellings?

The overall mix of households and dwellings in the social sector even in London is such that all households could be accommodated in non-crowded conditions if it were possible to require movement when household size changes and to require households to move between areas. In current circumstances, whether desirable or not, this is not possible, nor likely to become so. Additional supply of large units is therefore necessary if overcrowding among social tenants is to be addressed.

However this supply does not have to be new building – especially given the mix of dwellings available in the private sector, especially in Outer London. Ideally there would be a capacity for social providers to lease buy and sell properties to enable a better mix of properties to meet demand. Using the existing stock makes sense into the longer term especially with respect to very large dwellings (4 bed plus) as trends in household size suggest that numbers of households requiring that number of rooms will reduce. The position with respect to three bedroom dwellings is much less clear as general space standards improve. Given the massive increases in the proportions of two bed flats built since the turn of the century the case for rebalancing toward three bedroom units seems strong.

This is particularly relevant because 2-bed flats are extremely inflexible in terms of how the internal space can be used – so that any given extent of overcrowding may be more difficult to cope with in this type of accommodation than in larger dwellings. The emphasis on 2-bed flats

has therefore been important in worsening the problems of overcrowding among those whose household size increases by one or two after allocation. This strengthens the case for increasing the proportion of 3-bed units (either houses or flats).

It is not just new build which has unbalanced provision but the changes in the mix of dwelling stock from sales and regeneration. In this context, a further reason for increasing the proportions of 3 bed units is the extent to which the Right to Buy has disproportionately reduced the stock of larger units.

Even so, it is highly unlikely that increasing the supply of larger homes through new build will do much to solve the problems of overcrowding. If anything more larger homes may in the longer term result in greater under-occupation as tenants remain in the properties after the children leave home.

3. *The obstacles to increasing the supply of larger units*

The mix of density requirements; S106; HCA incentives etc. have clearly shifted the incentives towards smaller flatted units over the last decade. Financial incentives also point to smaller homes which cost less to build more effectively. This makes a prima facie case for attempting to increase larger, notably 3-bed units, especially in an environment where tenant mobility and the opportunities for leasing, purchase and sales by social landlords are so constrained.

In the current economic environment many developers may be happy to rebalance their projects towards those aiming to move up the market rather than to Buy to Let and smaller units. There is also some evidence that younger people may be prepared to share larger units rather than live on their own while saving to buy. This suggests that it may be appropriate to increase sizes in the private as well as in the social sector, at least in the short term.

It does not however make the case for putting a moratorium on building smaller units given the overall shortage of housing investment – rather all projects that can be made to stack up and meet minimum requirements should be enabled – even if these dwellings may be serving a different part of the market.

In the long term the most sustainable option is to increase population densities while at the same time increasing the size of units in square metre terms although not necessarily the numbers of rooms. This requires a more intensive use of land and higher planning densities – and is achieved in many other highly populated urban areas around the world. However the reasons for suggesting such this shift in emphasis are far more broadly based than the immediate issue of overcrowding.

Overall overcrowding should be addressed more by better housing management, more appropriate pricing and incentive systems and greater freedom for social owners to use the full range of options including leasing as well as purchase and sale. Decisions about the type and size of dwellings to be built should be based on more fundamental factors including the impact of rising incomes and smaller households on housing demand.

What are your views on the proposition that "increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding"?

It seems obvious that an increased supply of larger dwellings would address some of the identified shortfalls which have caused overcrowding in both the social rented and private rented sectors. However, new supply in the social rented sector is likely to end up, in the fullness of time, being under occupied as is clearly a case at the moment. The current problems with overcrowding in the social rented sector could be better dealt with by better management of under occupation within the sector. There is clearly a heavy degree of under occupation which more than outweighs the households who are experiencing overcrowding and more must be done, beyond existing measures, to ensure that there is a better match between housing need and existing social rented stock. This, of course, leads into areas relating to lifetime tenancies which are highly controversial. We recognize this but it seems that special management initiatives and new supply will not ensure that future problems in this area do not recur without more fundamental reforms of the nature of social rented tenancies. It should be at the very fabric of good housing management to identify and try to match up those who are under occupying with those who are over occupying. It is difficult to understand why it takes additional resources from DCLG and special teams to deliver what should be a basic component of good tenancy management.

There is a fundamental point here in that the proposal to deliver more family homes will, through the trickle down effect, help more households achieve better housing outcomes. However, whilst there is some truth in the proposition it ignores the fact that the overall trend of household formation is to smaller households and whilst there are acknowledged shortages in social housing for larger homes, future need remains principally for smaller dwellings.

It is a fact of life that there is a marked degree of under-occupation in both the owner occupied sector and social rented sector but appears to be not so with the PRS. Short of CPO, there would appear little that could be done about owners under-occupying their homes but that is not the case with social rented dwellings. These are provided through public subsidy at the outset and then often throughout their occupation with housing benefit subsidy and it is incumbent upon social landlords that they explore every avenue in seeking to optimise the occupation of the stock.

We have to comment that imposing an affordable housing obligation on providers of purpose built student accommodation will work against the creation of new supply. Basically more obligations on such providers will lead to issues of viability causing a reduction in overall output, which in turn will lead to students competing for, and in some places, crowding out family households in larger private dwellings.

What are the obstacles to increasing the supply of larger family homes?

Within the last decade the Mayor has successfully driven the increased densification of the inner parts of London with good transport locations. It is very difficult to secure suitable family accommodation within those environments and indeed many have argued that social rented accommodation in this situation should be deliberately under occupied to reduce child densities. Generally, the most successful model of larger family homes is the traditional terraced house with a garden. That is the aspiration of many young families and the flight to the suburbs, or beyond, once families begin to grow has been a familiar theme of the post-war era. Larger apartments, or flats, within such environments have not generally been promoted by the private sector, save in more expensive locations, where affordability is less of an issue. Marketing three bed flats has often been portrayed as two beds and a “study”. The smaller size of households has led to a reluctance to build significant proportions of flats above two bedrooms, except where market potential justifies.

The household makeup of the social rented sector and indeed the PRS may be different. Developers have accepted the mix imposed by local authorities as to the affordable housing component of new development generally without much resistance, provided the overall land take or proportion of habitable rooms has remained broadly the same. Indeed, larger family dwellings at ground level may be design benefit in accessing street level without the need for unsupervised lift journeys for children. However, child density and the implications for section 106 contributions to education have been problematic at times.

The overall demographic trend to smaller households has led to a proliferation of flatted schemes with a predominance of 1 and 2 bed flats, although where the market will bear it larger private homes, both flatted and houses, can be found. Until recently, the economics of the grant regime led to financial disbenefits in providing larger social rented dwellings. This reinforced the trend to smaller homes. A more finely tuned grant regime might lead to more larger social output but the effectiveness in overall delivery will suffer from the fact that larger homes not only need more grant because they are larger but also rents are not proportionate to the size of accommodation provided - family homes require more subsidy due to the lower effective levels of rent which can service a loan.

There are some PRS investors/developers who take the view that larger family dwellings meet a wide variety of need - families with children, working flat sharers and students are all groups that are attracted to this form of provision. Many existing and buy to let dwellings were built with the owner occupier in mind and purpose designed PRS is unusual - more robust fixtures and fittings and attention to water leaks are areas where significant long term management and maintenance costs could be reduced with appropriate design strategies. More needs to be done to encourage the PRS to take up the challenge.

The mayor has plans to tackle overcrowding in social rented by:

Introducing a target that 42% of new social rented homes should be three bedrooms or more; and

Implementing the Mayor's action plan to reduce social housing

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on building of small homes?

This new target of 42% is being phased in and that in itself is a recognition of the difficulties of imposing this as part of the section 106 requirement. A one bed flat comprises two habitable rooms, whereas a three bed home comprises a least four habitable rooms. In effect is, swapping a one bed for a three bed is doubling the burden on the developer. Planning agreements which talk only in terms of dwellings will become increasingly problematic if local authorities seek to change the underlying mix assumed in agreeing that requirement at the outset. New planning agreements will have to recognize the significant proportion of larger homes both in terms of habitable rooms and land take and thus the negative impact on viability. As mentioned earlier, higher proportions of larger homes will require other child targeted provision such as education contributions which are calculated on the mix, tenure and size of dwellings proposed. This is another burden which will cause contention with developers of larger schemes.

We are not aware that the Mayor has a proposal to reduce social housing. We believe that this is the proposal to swap the affordable housing split originally set at 70:30 in favour of social rented to intermediate, to 60:40. Generally, the industry has welcomed this as it is likely to lead to a higher level of economically active households on larger developments. Our comments above may be slightly mitigated in that the proposed level of larger intermediate homes is less than that proposed for social rented housing.

We would question what powers the Mayor has in calling for a moratorium (even on a temporary basis) on the building of small homes. It may be that the Mayor can direct a moratorium on smaller affordable homes construction but we would be very concerned were it to be proposed that an across-the-board moratorium incorporating private development could be under consideration.

What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

Clearly more larger homes, particularly in the social rented and PRS sectors in the near future would help alleviate the current unacceptably high levels of overcrowding within those sector's. However, as pointed out above they do

nothing to ensure the effective management of the existing stock where under occupation exceeds overcrowding. Unless this problem is addressed in a more robust way we will continue to build larger family homes which will become silted up and deny future suitable housing opportunities to needy households because of our unwillingness to tackle the difficult task of dealing with under occupiers.

Side benefits of such an approach could be reductions in housing benefit paid to homeless households housed within the PRS resulting from greater availability of larger social rent homes. The PRS however, must be part of the solution and were larger homes to be required across all tenures, then PRS homes with reasonable length tenancies (say, five years minimum) and rents which were pegged below the new housing benefit payments cap could be treated as part of the intermediate rental sector and thus treated as discharging part of any affordable housing requirement.

The fact has to be recognized that London's housing requirement of over 30,000 homes annually would require significantly more land and move the focus away from high density inner London sites to the outer areas of London. Houses with gardens clearly take a higher proportion of land than high density flats. While many argue that there are acceptable solutions to family housing in high density schemes, these are few and far between. It is inevitable that the focus of development to deliver a numerical housing programme, which emphasises larger family homes, would switch the geographical focus of development significantly with profound implications for physical infrastructure in the form of transport requirements and schools and other social provision.

Planning and Housing Committee: Overcrowding in London

Further to your recent request, I have responded to your queries as set out below:

1) What are our views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding ?”

- An increase in supply of larger homes, especially 4 and 5 beds will go some way to tackling the London Housing problem.
- It will address overcrowding and free up the smaller homes.
- It will create opportunities for growth within the family and accommodate growth within the family.
- This strategy will need to go hand in hand with a robust under-occupation programme i.e. encouraging under-occupiers to move to smaller homes.
- Other strategies need to be put in place to deal with the impact of an increase in the provision of larger homes, i.e. on infrastructure, transport, schools, hospitals etc.
- AmicusHorizon Limited currently have 277 households in an overcrowded environment and are waiting for 3 bed and above.
- This represents 4% of residents residing in AmicusHorizon Limited, London general needs stock.

2) What are the obstacles to increasing the supply of larger family homes ?

- Lack of land supply - the development of larger homes needs a greater footprint for development on brownfield sites, this is a problem due to land scarcity.
- Building one or two 4 bedroom houses on an infill site is very difficult to make viable.

- Rent Cap – The Rent Cap should be lifted or the Cap raised in relation to rent level, set for larger homes.
- High Build Costs - larger homes cost more for a marginal return, as certain space standards are required etc, i.e. Life for Housing.
- Low Grant Rates/Funding - Grant rates should be based on per person basis and this should link back to budget setting criteria.

3) The Mayor has plans in tackling overcrowding in Social Housing by:

- **Introducing a target of 42 percent of new social rented homes to be 3 bed and above.**
- **Implementing the Mayor's action plan to reduce Social Housing**

How effective are the above, compared to introducing a temporary stop on building small homes ?

- The Mayor's plans will be preferable and more effective than putting a moratorium on the development of small homes i.e. 1 and 2 beds.
- The Housing Strategy encourages a more sustainable mix of homes across the affordable sector and develops in the long run more balanced communities.
- For reason noted in our response to point 1 & 2, the emphasis of the building of larger homes has a positive impact on addressing housing need in the wider sense.
- In relation to the plan to reduce Social Housing - The Mayor has stated that he will abolish the 50 percent target and substitute it with a more regional target linked to Local Authority areas, taking into account the individual economic viability and likely availability of public sector investment (Social Housing Grant).
- There is still an overall commitment by the Mayor to delivering 50,000 of affordable homes by 2012, by negotiating affordable housing delivery targets with individual Local Authorities, the Mayor is confident that the 50,000 houses will be delivered.
- From 2011 local affordable housing targets will be set via the planning policy/LD Frameworks and these in turn will reflect the London Plan and 42% target for 3 bed + homes. This will ensure that the development of larger homes is integral to the local offer, affecting the increase in larger homes within the context of sustainable communities.
- The Mayor's Plan outlines a much more sustainable approach to achieving the number, as opposed to just stopping the development of 1 & 2 bed homes.

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London housing needs ?

An increase in the supply of larger family homes will impact positively on other London Housing needs such as:

- **Intermediate affordable and larger homes**
It will create the opportunity for the development of larger homes for the intermediate Market.
- **Temporary social housing**
It will free up overcrowding and families waiting in temporary accommodation for long periods.
- **Wheel Chair Accessible Housing**
It will address the demand for accessible homes within London.
- **Flexible tenures/mobility**
Due to the increase in numbers i.e. supply, there will be more choice and more opportunity for movement across regions and movement within tenures.



LONDON ASSEMBLY PLANNING AND HOUSING COMMITTEE: OVERCROWDING IN LONDON

CIH LONDON SUBMISSION TO THE COMMITTEE'S CALL FOR EVIDENCE

SEPTEMBER 2010

The Chartered Institute of Housing (CIH) is the professional body for people involved in housing and communities. We are a registered charity and not-for-profit organisation. We have a diverse and growing membership of over 22,000 people – both in the public and private sectors – living and working in over 20 countries on five continents across the world. We exist to maximise the contribution that housing professionals make to the wellbeing of communities.

CIH London is an elected voluntary committee representing 2,500 housing professionals working in London, with a mission to raise awareness of the CIH amongst those with an interest in housing.

Introduction

CIH London welcomes the opportunity to respond to the committee's enquiry into overcrowding levels in London's social rented housing.

We think that this is a significant time to be considering research into this area as overcrowding is a serious issue that affects many households in London and has negative impacts on their wellbeing.

In a survey with CIH London Members about key housing priorities, overcrowding came up as a top priority for our members.

We were pleased to give detailed and wide ranging oral evidence to the enquiry, and are happy for this to be made publicly available.

We have gathered our views and experiences from a range of housing professionals working in London to inform our views on overcrowding, and these

feed into our responses to the specific questions being considered by the enquiry.

Substantive response

Question 1 - What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

From the evidence gathered it is clear that enabling as much new affordable housing as possible and in particular larger family homes will only be one of a range of measures needed to help tackle overcrowding. This is because the scale of housing need and overcrowding cannot be matched by new supply alone. Overcrowding is a structural problem that has to do with the lack of housing in general. The best approach would be a combination of various approaches because providing choice and making best use of all options is crucial.

In the past CLG grant has been important for the majority of programmes local authorities and housing associations use but if this funding were not to continue councils they will have to return to the situation before the funding with a the focus on better use of existing properties and allocation policies.

Making best use of the existing social housing stock such as encouraging under-occupation, tackling illegal occupation, better use of space, allocation policies and mobility scheme can make a significant contribution to reduce levels of overcrowding.

Increasing the supply of larger family homes will tackle overcrowding only if coupled with allocation policies that significantly increase the priority assigned to overcrowded families wishing to transfer.

Some approaches that are being used effectively are:

- Tackling under-occupation
 - publicity and marketing
 - cash incentives
 - dedicated staff who can support under-occupying tenants to move house and assist with financial and practical arrangements
 - facilitating the moving process when offering housing exchanges for under-occupiers. Local authorities can work with many different partners to facilitate moves, e.g. occupational therapists, adult services, local libraries
 - help under-occupiers to find appropriate accommodation via choice based lettings - some housing professionals believe this is the most important factor for success
- Allocation schemes
 - share best practice amongst professionals
 - housing options services
 - give high number of points for under-occupants and for overcrowded households
- Reducing the experience and effects of overcrowding
 - de-conversions

- extensions
- portioning large rooms
- buy space saving furniture
- advice on benefits
- refer to children's services if appropriate
- small works in occupation: split one big bedroom in two; loft conversions; join the dry room of the next door flat
- Assessing overcrowding accurately using personal contact
 - focus on severe overcrowding and give households better options
 - dedicated staff
 - offer employment and training opportunities as part of the advice package – increasing households' resources to find accommodation elsewhere
 - drill down to people not too overcrowded and use preventative methods to try to prevent the situation worsening
- Making use of the private rented sector
 - moving to a bigger private property while the household also joins the register for social housing.
- Supporting longer-distance mobility
 - making use of the Seaside & Country Homes scheme, mutual exchange services and Choice Based Mobility
- Supporting adult children to move away from the family home
 - councils can offer schemes to adult non-dependants in overcrowded households who are referred to a housing association and offered training courses, internships and work placements. If accepted on the course the council proposes a one bed room accommodation with an AST and when they finish the training the housing association will help them maintain their tenancy.
- For older tenants:
 - proposing sheltered accommodation
 - relaxing restrictions to allow under-occupiers aged over 55 to move in retirement accommodation thus freeing up family sized homes for overcrowded families.

Some of the most successful approaches to tackle overcrowding we have identified are:

- local authorities visiting households, helping them to bid through the Choice Based Lettings system and taking away the hassle of moving
- providing housing options and focus on dealing with the effects of overcrowding and providing measures to make better use of space, extensions, de-conversion, etc
- make use of extensive assessment of overcrowding and build individual relations with overcrowded households and under-occupiers
- make use of the private rented sector to accommodate overcrowded households in large family homes while they also join the register for social housing.

Question 2 - What are the obstacles to increasing the supply of larger family homes?

A number of factors that impact on delivery of affordable housing in general, and family sized homes in particular. These fall within two main categories: the availability of sites and levels of funding for new affordable housing.

- The primary sources of sites for new affordable housing are those delivered through the planning system and publicly owned sites brought forward for development, including those owned by and other sites acquired by housing associations.
- There are a number of barriers to delivery of sites identified through the planning system, although economic viability is the key driver in most cases as the affordable housing relies on subsidy from the wider development. This will influence not only the overall percentage of affordable housing but the tenure split between social rented homes and intermediate housing and also the size of homes provided.
- High land values are an obstacle. As a result fewer homes would be provided if more 3 + bedroom homes are included in a development. Developers have tended towards provision of smaller homes to make it work financially for them.
- Local authorities can work with developers and housing association partners to influence the type of affordable housing schemes that come forward and, in particular support schemes that will deliver more family-sized homes.
- However, in seeking to increase the supply of affordable housing the level and amount of grant available through the HCA's National Affordable Housing Programme (NAHP) is an important factor. The HCA has recently sought to increase the percentage of family-sized units delivered with NAHP funding to meet the Mayor's targets as set out in the London Housing Strategy, currently 42%.
- The local authority new build programme has been positive for bringing forward new council houses. Local authorities developing directly have been able to define family homes as a priority. However capital resources to sustain development programmes are limited without HCA grant or other forms of subsidy.
- Local authorities that own a considerable amount of land may feel they have the power to shift the terms of the negotiations with developers and ask for more affordable family size homes.
- The HCA has been supportive of building large family size accommodation but the reality of delivery has been different as the HCA has tried to reconcile a number of priorities. The recession has led the HCA to support the construction industry by funding housing associations to buy unsold 1-2 bedroom accommodation.
- Some housing professionals feel that in the new devolved arrangements it could be easier for LAs to drive development of family homes as they will define the priorities, plan better, use available land and enter negotiations with developers with more confidence. Developers will go to the LA instead of the HCA and the LA will be able to judge which sites to develop, what tenure, look at the bigger picture, and focus there where more social benefits are created.
- The main issues when trying to develop larger homes especially in London are cost and planning. The cost of developing larger affordable homes is disproportionately higher than developing smaller homes. This is because the rent caps are in quite a compressed scale and the difference between the rent of a two bedroom house and a four bedroom house does not meet the additional cost of the development. The grant levels are higher, but again do not fully meet the extra cost of building more square metres.
- Planning has caused problems also as in the past there was an assumption of maximising density and that led to developers securing planning for high

- There is concern that the new HCA-defined standards are going to make it even more expensive to provide large size family homes. There is widespread support for high standards, but a feeling that improvement must be financially viable. Good design is critical for all homes but in particular for larger homes in high density areas, where internal space and local amenities are at a premium.

Question 3 - The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce social housing¹.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

We are clear that a temporary moratorium would prove counter. The preferred approach is to use the planning policy framework to promote the right kind of developments in the right places, with the right level and types of affordable homes.

- The economic viability of a development is critical in determining when it comes forward, if at all. The level and mix of affordable housing required will impact on the development as will the level and amount of grant available. The cost of building larger homes, the land take and the grant requirement will be higher for larger homes
- The realities of the development process mean that it can be hard to provide only family sized homes and that a mix of properties is required for viability and positive social impacts.
- Many housing associations use a development model where sales of market and intermediate properties generate surpluses which are reinvested in the business and allow social and family sized homes to be built.
- With a new focus in HCA investment priorities and clear local priorities there is a move in the right direction in terms of increasing the percentage of family sized homes.
- If new units were to be only family size accommodation new development would work against the objective of building and supporting mixed communities. It would also have costly impacts on health services, school provision etc.
- There is a view that suggests that the first reaction to a moratorium would be not to build at all. It is most likely housing associations would adapt and provide new types of products but with reduced numbers. It is also likely that private developers would hold back on development if the moratorium is temporary, or would push for financial incentives to include more larger homes.

¹ http://www.london.gov.uk/sites/default/files/Overcrowding_Action_Plan.pdf

Question 4 - What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

- Prioritising development of larger homes over addressing other housing needs would actually hinder the ability to tackle overcrowding, as well as creating wider problems for other housing issues in the capital.
- The Mayor's policies should continue to include both new build and housing management approaches to meet a range of needs, although stressing the need to focus on overcrowding would be appropriate.
- The Assembly and local authorities should look for ways to maintain funding for staff who actively support tenants to move to smaller properties - these initiatives work well.
- There will never be enough family homes to meet demand so we have to encourage downsizing and mobility.
- There is a real need for small sized properties, and supporting their development and households' access to them meets a range of needs including tackling overcrowding.

Conclusion

Overcrowding is a key concern to housing professionals in London. It impacts on their day to day working practices and experiences, and so there is a wealth of information and good practice for the Mayor and local politicians to draw on when developing policy approaches to address it.

The Assembly's inquiry into overcrowding is very welcome. We encourage the Assembly and the Mayor to take forward policies which encourage prioritisation of overcrowding and enable use of a range of tools to address it, whilst also keeping focus on other important and interrelated housing challenges in the capital. We also encourage the Assembly and the Mayor to engage with policies and debates at national level which will impact on London's ability to tackle overcrowding, in particular the recently announced reforms to housing benefit which are a cause of grave concern to housing professionals and tenants alike.

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CIH provides a wide range of services available to members, non-members, organisations, the housing sector and other sectors involved in the creation of communities. Many of our services are only available to CIH Members, including discounts. Our products and services include:

- Training
- Conference and events
- Publications
- Enquiries and advice service
- Distance learning
- Organisational development

Dear Ms Hurcombe

OSRH033

London Borough of
Southwark

London Assembly's Planning and Housing Committee – review into overcrowding levels in London's social rented housing

Thank you for the opportunity to contribute to this important review and we welcome the proposal to increase the supply of larger homes.

Please find enclosed our

- Response to the specific questions posed
- Appendix A: Up-to-date information on Southwark's Housing Register
- Appendix B: Overcrowding in Southwark
- Appendix C: Additional Information on overcrowding in Southwark and other related issues
- Appendix D: Southwark's Family Housing Policy
- Appendix E: Copy of our Lettings Policy

We shall look forward to hearing the outcome of the review.

Yours sincerely



London Assembly's Planning and Housing Committee: Overcrowding in London: call for evidence to test that if the focus of housing strategy was to shift towards increasing the supply of bigger homes, it may have a more significant impact on solving housing problems at every level than the current target driven approach that produces more, smaller, homes.

1) What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

Southwark is supportive of the above proposition.

As Southwark has a significant level of overcrowding within social housing, our core strategy and policies support the provision of larger units.

Southwark carried out a Housing Requirements Study in 2008. This revealed that around 31% of all households wanted to move, with 13% of all households saying they felt their home was too small. This study categorised over 8,000 households as overcrowded. When applying the bedroom standard, over 15% of council tenants and almost 10% of RSL tenants were assessed as being overcrowded.

In general the conclusions of the study support the Assembly's contention that producing larger dwellings is likely to filter down and free up smaller units. However it is important to note that in practice, new dwellings tend to be filled by inward migration, so housing need may not change as much as anticipated. See [Appendix C](#) which provides more detail on the outcome of the study in Southwark and the level of overcrowding.

The approach of Southwark's draft Core Strategy is to develop more family housing with 3 or more bedrooms. Developments in Southwark of 10 or more units must have at least 60% family sized homes of 2 or more bedrooms and the zones outlined on [Appendix D](#) having at least 10%, 20% and 30% of 3, 4 and 5 bedroom homes. The amount of 3 bedroom homes is linked to density, with lower density areas being more suitable for larger family homes where there is a need to provide private amenity space.

Our Housing Strategy 2009-16 states that 15% of households on Southwark's housing register require three-bedroom homes and 6% need homes with four or more bedrooms. Over recent years the majority of new homes built in Southwark have been one or two bedroom homes.

Our Annual Monitoring Report shows that in 2008/09:

- 63% of new dwellings had 2 bedrooms or more (which exceeds our policy and is 3% higher than previous year)
- Of these, 13% had 3 bedrooms or more, exceeding our policy of 10% and greater than 2007/08 (9%) and 2006/07 (8%)
- The tenure mix: 44% social housing, 3% intermediate and 7.5% market

- The largest number of 3 bedrooms plus dwellings were in social rented housing, whilst intermediate housing was a mixture of 1 and 2 bedrooms. Given the relatively low average income in Southwark, there is a particular need for larger affordable homes.

Intermediate Housing: The Housing Requirements Study shows there is a surplus of 862 intermediate homes over the next five years. Within this surplus there is still a net requirement for 3 bedroom intermediate housing and therefore there is still a case for providing dedicated housing products for those needing family-sized accommodation.

We requested additional tables from ORS following the publishing of our Housing Requirement report on existing households judged as in housing need. The bedroom estimates are based on the CLG bedroom standard, not Southwark's own standard. It shows that many households in need require fewer rooms – these are typically households who have support needs and require a move. There are also many who require more bedrooms and these are typically overcrowded households. Over 1,400 households in the backlog require 4 bedrooms plus, but none will vacate 4 bedroom homes or above.

All council tenants in need		Current home size				Less Supply	Net need of surplus	See Note A below
		1	2	3	Total			
Required	1	757	527	121	1405	2005	-600	Surplus
	2	907	1205	294	2406	3762	-1356	Surplus
	3	218	1685	869	2772	1883	889	Need for more dwelling
	4	123	345	441	909	0	909	Need for more
	5	0	0	89	89	0	89	Need for more
	6	0	0	69	69	0	0	Need for more
Total		2005	3762	1883	7650			

Note A: The end column shows what would happen if all the tenants in need were to be rehoused in the correct size of property - there would be either a net surplus or shortage, according to the bedsize. The potential supply is the people who would have moved out and freed up those dwellings. These tables are from the Housing Requirements Study, but are not published in the actual report.

Sources:

The Housing Requirements Study 2008

http://www.southwark.gov.uk/downloads/download/1994/housing_statistics

LBS Draft Core Strategy and evidence base

http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version

Southwark Housing Strategy

http://www.southwark.gov.uk/info/200141/housing_strategy

Local Development Framework - Southwark Annual Monitoring Report 5 April 2008 - March 2009

2) What are the obstacles to increasing the supply of larger family homes?

A meeting was held with Officers from Planning Policy, Strategy, Planning and Housing Options and the following was raised in relation to this:

- Our Affordable Housing Viability Study 2010 shows that whilst an increase in the proportion of family housing does have some impact on residual values, it is unlikely to be sufficiently significant to affect the ability of developers to bring sites forward
- Grants system favours more smaller units
- Difficulties in meeting affordable housing target – helpful if this calculated on number of people housed rather than number of units
- Physical space - must consider the suitability of larger units in dense developments; would all 3 bed flats in a block be a good outcome? As we are aiming to produce mixed and balanced communities, it is important that a range of housing sizes, types and tenures are achieved. Hence policy 4.3 of the Southwark Plan and Policy 7 of the Draft Core Strategy also encourages 1 and 2 bedroom homes
- Design issues - open plan kitchen/diners not popular
- Space standards important as key in order to incentivise people to move from their under-occupied property
- Play spaces, balconies, open space requirements. More limited in denser areas as these are less suitable for family homes due to need for access to private outdoor amenity space. Our current policy requires dwellings of 3 bedrooms or more to have direct access to private amenity space of a minimum of 10sqm. This is set out in policy 4.3 of the Southwark Plan and the adopted Residential Design Standards supplementary planning document 2008.
- Ongoing higher management costs for high density homes – noise issues, service charges
- Cost of intermediate homes not accessible to many Southwark residents – see Appendix C for further details
- Tenants who are overcrowded in one or two bedroom social housing home and can afford low cost home ownership are unable to access this option as there are very few three bedroom homes in sub-region

Intermediate obstacles

In practice it is difficult to deliver intermediate housing for households with incomes close to a target social rent of £15,400. Currently there are no intermediate housing products available in Southwark for households with incomes of less than £29,000 pa. On the basis that intermediate rents are set at 75% of market rents in Southwark, a household would require an annual income of £25,900 to be able to afford a 1 bedroom dwelling on the assumption they spend 25% of their gross income on rent. This is still lower than the current cheapest intermediate housing product in Southwark, but is a much more plausible solution for which intermediate housing products could be provided in the borough.

Sources:

Policy 4.3 of The Southwark Plan

http://www.southwark.gov.uk/downloads/download/2284/the_southwark_plan

Policy 7 of draft Core Strategy

http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version

3) The Mayor has plans to tackle overcrowding in social rented housing by introducing a target that 42 per cent three bedrooms or more and implementing the Mayor's action plan to reduce overcrowding in social housing. How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

We consider that a key method of ensuring effectiveness is by attaching the HCA grant to the target.

A temporary moratorium on the building of small homes may have an adverse impact on moves for under-occupiers - who are looking for smaller, good quality homes to entice them to move.

In Southwark we are aiming to produce mixed and balanced communities as referred to above and supported by policy 4.3 of the Southwark Plan and Policy 7 of the draft Core Strategy and would therefore also encourage the provision of smaller units.

Sources:

Policy 4.3 of The Southwark Plan

http://www.southwark.gov.uk/downloads/download/2284/the_southwark_plan

Policy 7 of draft Core Strategy

http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

- As above, in order to encourage under-occupiers to move to a smaller home, good quality alternative accommodation is needed. In a recent survey carried out with Southwark tenants registered with our under-occupation scheme, the second most important factor in considering a move is the condition of the property (first consideration is location)
- As concluded in our Housing Requirements Study, the building of larger homes should filter down and free up smaller units to address other needs. It is important to note that some under-occupiers require smaller homes on the ground/ low floors as do those with medical needs. However you will see from Appendix A that there are also significant numbers of applicants who are both overcrowded and have medical needs and require three bedrooms or more

Sources:

The Housing Requirements Study 2008

http://www.southwark.gov.uk/downloads/download/1994/housing_statistics

Southwark Small is Beautiful Questionnaire Report 2010

5) Challenges to increasing supply: what are the issues surrounding house building economics on increasing the supply of larger family homes?

- A flexible rent regime is needed to obtain a realistic rent back for a 4 bedroom home.
- Impact on service charges on what people can afford – high density, high degree of maintenance – stacking homes, lifts, amenities etc make expensive
- HB restrictions can lead to homes being unaffordable to people
- HB changes may also lead to increased risk of homelessness and therefore increased demand for social housing – where private landlords decide to no longer accept LHA

Also See reference to Grants system as outlined below under 'Other measures for increasing supply.'

6) Mayor's approach: To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes? What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

- We consider it is not just new build that provides a solution. Our extensions / de-conversions programme, from targeted funding streams have proved invaluable in addressing overcrowding.
- De-conversions are popular (using our existing stock) and have enabled the creation of 4-7 bed houses at less cost than new build and with a lower carbon footprint. The same applies to extensions which have also enabled us to address housing need for our tenants and allowed them to stay in their homes
- Temp to perm schemes – with properties let at market rents so eventually can be affordable
- Affordable housing in student schemes to tackle overcrowding which otherwise would have been entirely private developments. We are taking this forward through policy 8 of our draft Core Strategy. This will require student schemes to provide a minimum of 35% as conventional affordable housing, including family housing.

Source:

Policy 8 draft Core Strategy

http://www.southwark.gov.uk/downloads/download/1966/core_strategy_publicationsubmission_version

7) Other measures for increasing supply: How can variable grant rates encourage the provision of more family housing?

It is crucial for the HCA when considering investment and the value for money aspect that they consider the cost in terms of the number of people housed as well as the overall cost of the dwelling. Obviously the cost of a larger unit will be proportionality more than a smaller unit when simply considered on a cost per unit basis. However, if you factor in the number of people, then the differential is substantially reduced.

In addition, the differential in target rent levels between one and two bed homes and larger family homes do not acknowledge the proportionate increased build costs for larger homes. As RSLs have to factor in the future rental stream when assessing the viability of a scheme, this means they need to seek higher grant levels, which again needs to be taken into account when considering the value for money aspect of schemes.

8) What other ways are there to increase the supply of larger family homes?

Incentivise RSLs – acknowledging the cost of, say, a four bedroom home is higher than two bedroom.

When authorities are seeking three bedroom plus new homes – this usually means they end up with three bedroom rather than larger. We have been specific through our adopted Aylesbury Area Action Plan. Within the AAP we set out the percentage requirement of 4 bedroom and 5 bedroom units as well as 3 bedroom units to ensure we do not just get 3 bedroom dwellings.

Source:
Aylesbury Area Action Plan

9) What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

A key point in relation to the production of larger units was identified in our Affordable Housing Viability Study. The consultants tested larger room sizes for us (as proposed in our draft Core Strategy) which are approximately 10% larger than the existing standards we use in our residential design standards SPD and a requirement for more family housing, and this showed that whilst it has some impact on viability it is not a significant impact.

Our draft Core Strategy will require the policy for more family housing and larger room sizes to be applied to all tenures. In terms of encouraging larger homes and ensuring viability - we also have a study at Canada Water which shows that it is viable to have the larger room sizes and 20% family housing, and this applies to both affordable housing and private housing.

Sources:
LBS Affordable Housing Viability Assessment January 2010, BNP Paribas Real Estate and Christopher Marsh & Co.

Canada Water Area Action Plan – Financial Viability Study Feb 10
http://www.southwark.gov.uk/downloads/download/1964/financial_viability_study_feb_2010

Additional points

It is important to note that a good size and well designed 2 bed 4 person home might be better than a "small" 3 bed 4 person open plan living kit/diner property. It is not just about numbers of bedrooms but design, layout, access to amenity space, location – these are also equally important.

Larger Wheelchair adapted properties are also needed – could have overcrowded households awaiting this type of housing.

Southwark Council - Housing Register by Category/Bedsize - 5/8/10

BAND	CAT	TOT	BD1	BD2	BD3	BD4P plus
BAND 1	CAT Prop Factor	193	49	83	44	17
	CAT_Stat OC	25	7	6	12	
	CAT_Under-Occ	373	94	242	32	5
	CAT_Social Serv	9	1	1	5	2
	CAT_Sheltered	38	34	4		
BAND 2	CAT OC/Med	604	41	155	220	188
	CAT HLess/Med	219	137	41	22	19
	CAT Urg Medical	200	27	64	82	27
	CAT Move on	37	37			
	CAT Man Needs	84	17	24	22	21
	CAT SS Care	61	50	11		
	CAT OC/insanitary	1	1			
	CAT Sheltered	85	84	1		
BAND 3	CAT OC	4768	1033	1950	1270	515
	CAT Homeless	1073	384	549	101	39
	CAT Medical	1170	732	301	112	25
	CAT Rel b/down	65	44	14	3	4
	CAT Insanitary	1	1			
	CAT Sheltered	54	53	1		
BAND 4	CAT W/List	5519	4658	705	137	19
	CAT T/List	1890	1030	591	237	32
	CAT Alt L/L	84	46	27	9	2
	CAT Sheltered	21	21			
BAND O	CAT Disability	84	28	23	24	9
	CAT_ERR*	260	54	89	83	34
	CAT_EA	19	7	7	4	1

sum		16937	8663	4890	2413	971

Overcrowded applicants are highlighted in red above - a total of 5398 households. It is also possible that some of the other categories in Bands 1 and 2 and the Disability group may include households who are overcrowded.

Under-occupiers - highlighted in green. A total of 373 households are registered in our under-occupation category.

*CAT ERR - refers to applications requiring amendments in relation to change of circumstances for example

NB Southwark's policy states that a child qualifies for their own bedroom at the age of 16 (not 21). Children of different sex can share until they reach the age of 10 years. Additionally a single person's bedroom should be at least 6.5 sq metres while a double should be 10 sq metres.

Breakdown of Housing Register - overcrowded households in Southwark as at 5/8/10 – showing current bedrooms occupied by bedrooms required

Current home size	Bedrooms required	Total
Studio	1	1075
	2	413
	3	37
	4	9
Occupying 1 bedroom	2	1691
	3	245
	4	21
	5	5
	6	1
Occupying 2 bedrooms	3	1218
	4	244
	5	24
	6	4
	7	1
Occupying 3 bedrooms	4	239
	5	107
	6	16
Occupying 4 bedrooms	5	27
	6	15
	7	4
Occupying 5 bedrooms	6	1
Occupying 6 bedrooms	7	1
Total households		5398

Turnover: The following table is approximate - in that it only refers to the stock currently owned as at August 2010 – not properties that have been lost over the last five years. It does not include RSL or tenant managed co-operative homes. It does however offer a general guide to turnover. For example, out of 100 2-bed dwellings, 30 were relet over a five year period. The turnover decreases as the bedsize increases.

Turnover of dwellings, Financial Years, 2005 -2010			
Bedsize	LBS-managed Stock (Aug 2010)	Tenancy Starts in last 5 years	Tenancy Starts per 100 stock in 5 years
Bedsits	1970	941	48
1 bed	10994	4794	44
2 bed	12972	3839	30
3 bed	8581	1818	21
4 bed	2049	401	20
5 bed	289	43	15

Estimates of the scale of requirements and nature of overcrowding in social rented housing in Southwark

The following information is from Southwark's Housing Requirements Study in 2008 . The survey assessed households' needs **by a bedroom standard**, with the following results:

Overcrowding and under-occupation by tenure (Source: Southwark Household Survey 2008)

Note figures rounded to nearest 10

Tenure	Under-Occupying	Correct no of bedrooms	Overcrowded	Totals
Owned outright	7,970 (80%)	1,730 (17.4%)	260 (2.6%)	9,960 (8.2%)
Owned with a mortgage	14,440 (65.8%)	5,820 (26.5%)	1,690 (7.7%)	21,940 (18.1%)
Rent from Council	15,280 (31.9%)	25,320 (52.9%)	7,250 (15.2%)	47,850 (39.5%)
Rent from RSL	2,740 (24.7%)	7,310 (65.8%)	1,050 (9.5%)	11,110 (9.2%)
Private rent	8,130 (26.9%)	18,320 (60.7%)	3,740 (12.4%)	30,190 (24.9%)
Total	48,570	58,500	13,990	121,050

The Housing Requirements report also analyses information about existing households, available accommodation and about household formation/dissolution/ /migration in order to make predictions of what is required. Adjustments had to be made in order to align this with Southwark's allocation policy (which allows for a separate bedroom for a 16 year old rather than 21).

5-year net Housing Requirement by Housing Type and Size after allocating below intermediate rent affordability to social housing and applying new bedroom standard (Source: ORS Housing Market Model, Southwark Housing Requirement Assessment 2008). Note: Figures may not sum due to rounding)

Housing Requirement	Type of Housing			Total
	Market Housing	Intermediate Housing	Social Rented Housing	
Solving Backlog over 10 Years				
Shared housing for 25 years or under	3,020			3,020
1 bedroom	4,041	(298)	2,073	5,816
2 bedrooms	(239)	(1,579)	1,165	(652)
3 bedrooms	624	1,789	(284)	2,128
4+ bedrooms	(2,380)	(775)	3,504	349
Total	5,066	(862)	6,458	10,662

This table shows the net requirement for additional housing after the Housing Requirements model has taken account of vacancies arising within the existing stock.

Numbers of homes

The evidence shows that there is a large requirement for social housing in Southwark in the next 5 years. The requirement is concentrated upon 1 bedroom, 2 bedroom and 4+ bedroom dwellings with an apparent surplus of 3 bedroom dwellings.

The 1 bedroom requirement is primarily to service the needs of newly forming households, while the two bedroom requirement serves the needs of households with one child. Meanwhile the 4+ bedroom requirement reflects the needs of a high number of households who are currently overcrowded in smaller social dwellings.

If many extra 4+ bedroom social rented dwellings are provided, this will allow households who are overcrowded in 3 bedroom dwellings to have their needs addressed. This in turn will see 3 bedroom stock vacated which could in turn be occupied by households who are overcrowded in 2 bedroom dwellings. Therefore, the provision of more 4+ bedroom social rented dwellings could resolve more than one housing need by allowing households to move to more suitable dwellings.

If the identified requirement of 3,500 social rented 4+ bedroom dwellings is provided over the next 5 years they will create a potential surplus in 3 bedroom social rented dwellings. However, even if the larger dwellings are provided, it is likely that this surplus will only be hypothetical and that in practice these dwellings will be occupied by those who require only 2 bedrooms under the bedroom standard. It is also the case that the delivery of 3,500 social rented dwellings with 4+ bedrooms will prove to be extremely difficult in the next 5 years.

Intermediate housing

The Housing Requirements study concludes there is a surplus of 862 intermediate homes over the next 5-years.

The surplus of intermediate housing reflects households who are currently occupying lower quartile private rented dwellings who when moving can either afford to access full market housing, or who have been allocated to social housing because they cannot afford intermediate rents. Within this surplus there is still a net requirement for 3 bedroom intermediate housing and therefore there is still a case for providing dedicated housing products in the future.

It should be noted that the Housing Corporation are currently assessing the range of intermediate housing products available. Therefore, there may be more scope in the future to develop intermediate housing products which are accessible for those with household incomes below the current threshold for Southwark of £29,000.

Southwark Specific Modelling

In considering whether more larger units could help, the level of affordability by overcrowded households is of key importance when looking at intermediate housing. Figures on incomes from the study are as follows:

Appendix C

Tenure	Mean	Median
Owned outright	£33,100	£19,200
Owned with a mortgage	£64,200	£46,000
Rent from council	£14,800	£9,100
Rent from housing association	£18,500	£14,300
Private rent	£31,700	£22,200
Total	£29,800	£16,800

The survey reveals that the mean average and median incomes of Southwark residents are £29,800 and 16,800 respectively. This shows that a relatively small number of households with high incomes inflate the mean income of the borough. There is considerable variation by tenure and household type, ethnic groups and a range of other factors.

The following table shows the net requirement for additional housing after the Housing Requirements model has taken account of vacancies arising within the existing stock.

This shows that when only households who can potentially afford intermediate rent products are allocated to intermediate housing, there is now a substantial net requirement for social rented dwellings and a surplus of intermediate housing. This surplus reflects households who are currently in the lower quartile private rented sector in Southwark, but who can neither afford to access full market housing or afford intermediate rents, and will therefore be allocated to social housing when moving.

It is also noteworthy that there is a significant net requirement for larger (4+ bedroom) social housing and for smaller (1 bedroom) market housing. This result comes close to the evidence from the 2008 Greater London SHMA which found a need for small market and large social units.

5-year Net Housing Requirement by Housing Type and Size After Allocating Below Intermediate Rent Affordability to Social Housing and Applying new Bedroom Standard (Source: ORS Housing Market Model, Southwark Housing Requirement Assessment 2008. Note: Figures may not sum due to rounding)

Housing Requirement	Type of Housing			Total
	Market Housing	Intermediate Housing	Social Rented Housing	
5-year Net Requirement				
Shared housing for 25 years or under	3,020			3,020
1 bedroom	4,041	(298)	2,073	5,816
2 bedrooms	(239)	(1,579)	1,165	(652)
3 bedrooms	624	1,789	(284)	2,128
4+ bedrooms	(2,380)	(775)	3,504	349
Total	5,066	(862)	6,458	10,662

Appendix C

Annual Requirement				
Shared housing for 25 years or under	604			604
1 bedroom	808	(60)	415	1,163
2 bedrooms	(48)	(316)	233	(130)
3 bedrooms	125	358	(57)	426
4+ bedrooms	(476)	(155)	701	69
Total	1,013	(172)	1,292	2,132

The figures below are based upon solving Southwark's backlog of need over a 10 year period and compares the results of solving it over 5 years.

This change has very little impact upon the final housing requirement. This is because many of the households who form the backlog of need are already housed in either social housing or in lower quartile private rented dwellings. When they move to solve their housing needs they will also vacate a property which can be classified as affordable housing. Therefore, while the model now assumes that more households will have to move within the affordable housing sector to solve their needs, these changes are largely matched by an increase in affordable housing supply so the net affordable housing requirement does not significantly change.

10-year Net Housing Requirement by Housing Type and Size After Allocating Below Intermediate Rent Affordability to Social Housing and Applying new Bedroom Standard Using Different Periods to Solve Backlog of Need (Source: ORS Housing Market Model, Southwark Housing Requirement Assessment 2008. Note: Figures may not sum due to rounding)

Housing Requirement	Type of Housing			Total
	Market Housing	Intermediate Housing	Social Rented Housing	
Solving Backlog over 10 Years				
Shared housing for 25 years or under	3,020			3,020
1 bedroom	4,041	(298)	2,073	5,816
2 bedrooms	(239)	(1,579)	1,165	(652)
3 bedrooms	624	1,789	(284)	2,128
4+ bedrooms	(2,380)	(775)	3,504	349
Total	5,066	(862)	6,458	10,662
Solving Backlog over 5 Years				
Shared housing for 25 years or under	3,020			3,020
1 bedroom	3,912	(514)	1,250	4,648
2 bedrooms	(423)	(1,368)	1,032	(759)
3 bedrooms	511	2,064	(65)	2,509
4+ bedrooms	(2,380)	(762)	4,583	1,441
Total	4,639	(580)	6,800	10,859

Source:
The Housing Requirements Study 2008
http://www.southwark.gov.uk/downloads/download/1994/housing_statistics

Fig 3: Family Housing Policy

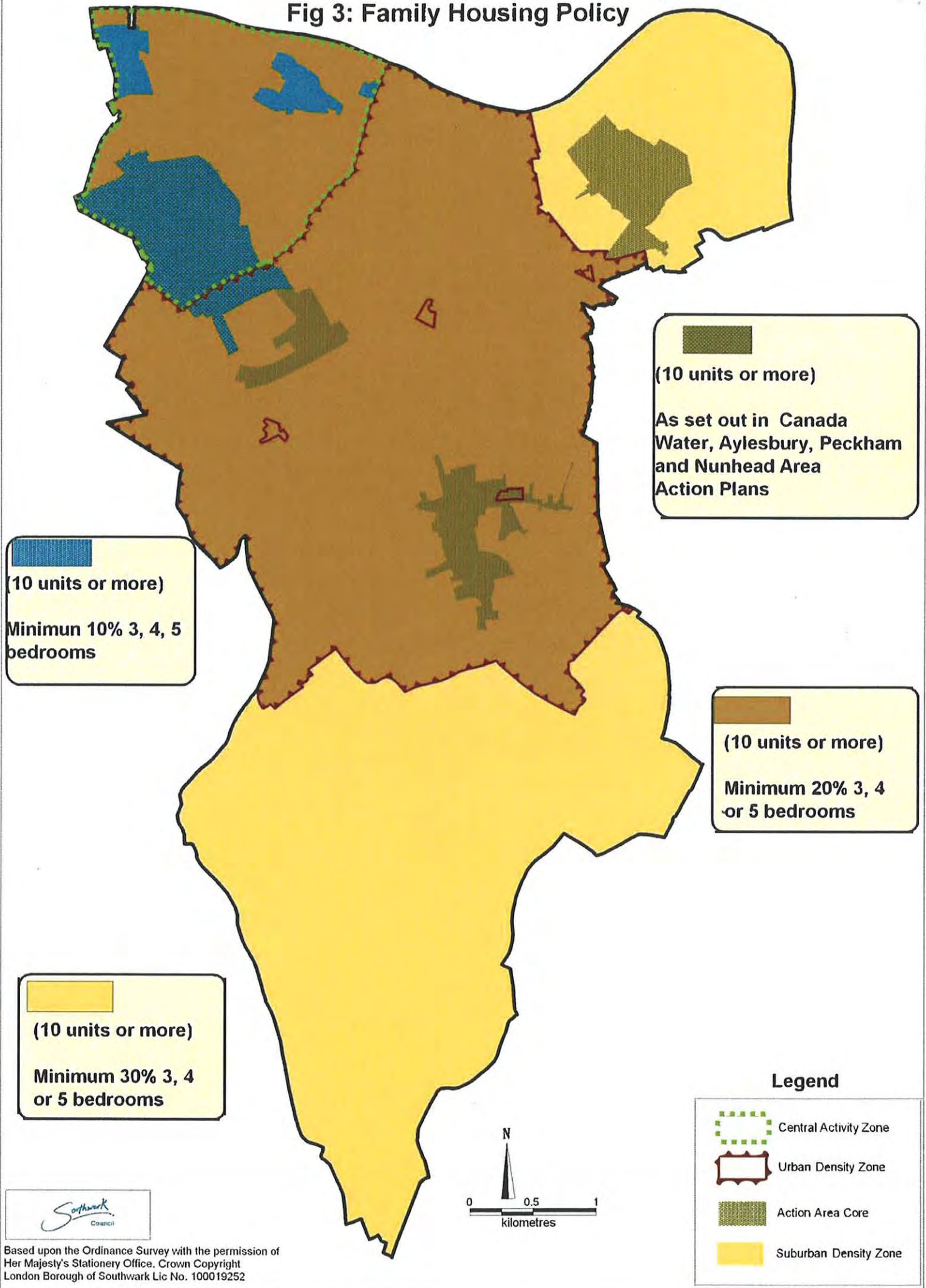
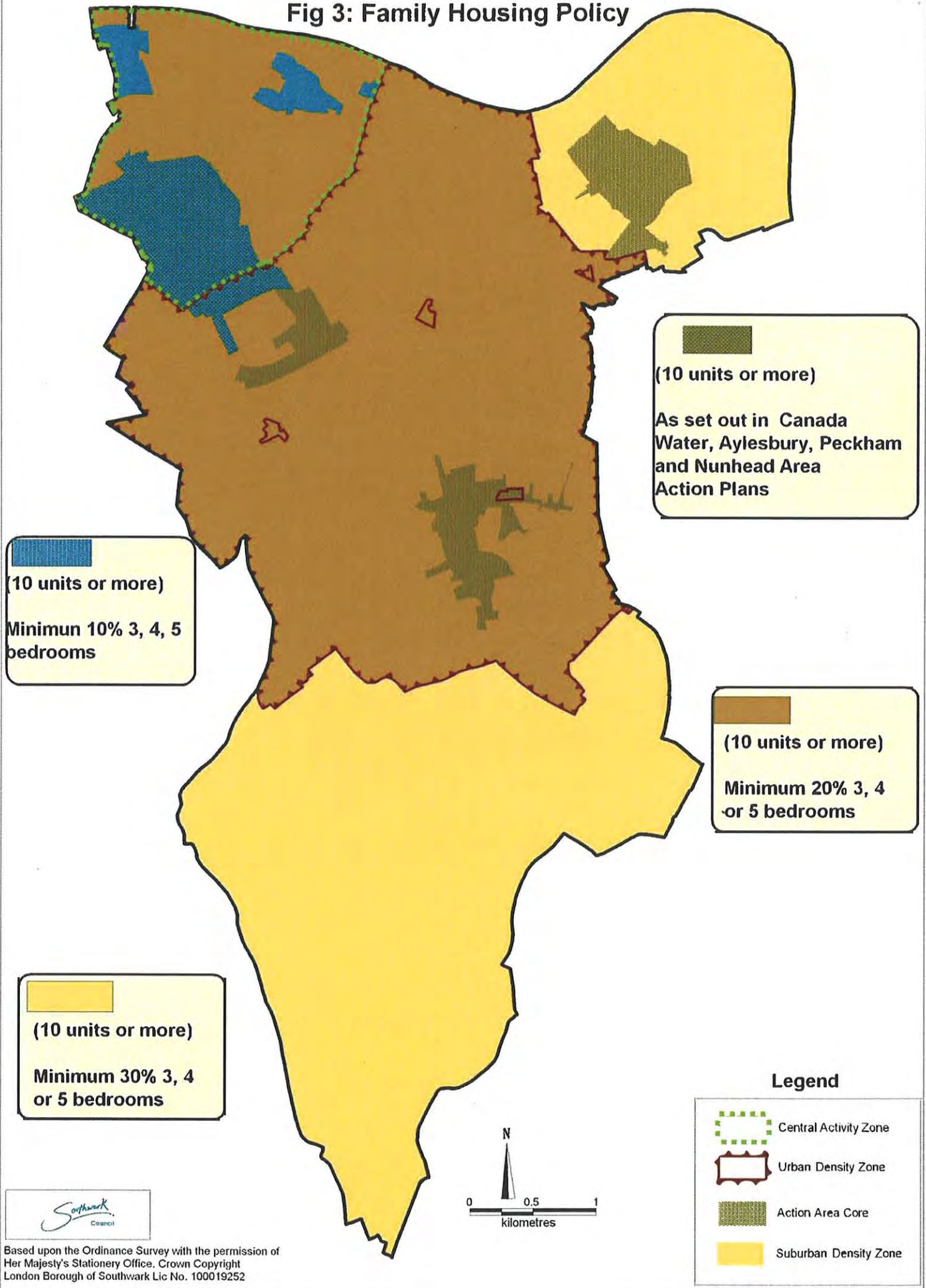


Fig 3: Family Housing Policy



LONDON BOROUGH OF SOUTHWARK

LETTINGS POLICY

Residents of Tenant Management Organisations (TMOs) **may** need to be referred to their TMO office. In all cases check the relevant TMO Management Agreement to see if service provision remains with the Council. For further clarification please contact the Tenant Management Support Team.

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See also Homelessness and Temporary Accommodation, Rent Arrears and Variation of Rent, Domestic Violence and Repairs Policies.

PART I: THE LEGAL FRAMEWORK

1.1 THE HOUSING ACT 1996 AND THE HOMELESSNESS ACT 2002

- 1.1.1 Part VI of the Housing Act 1996, amended by the Homelessness Act 2002 sets the legal framework for the allocation of accommodation by local authorities to applicants other than existing tenants. Authorities must have regard for the statutory Code of Guidance in exercising allocation functions.
- 1.1.2 The Council maintains a housing list and only 'qualifying persons' are allowed to be registered on it. The Secretary of State may define who are and are not 'qualifying persons'. Subject to the terms of the Act and related Regulations, the Council may determine who may or may not be on the housing list.
- 1.1.3 The Council has a duty under the Act to ensure that in letting its property it gives 'reasonable preference' to certain categories of housing need defined in the Act. Subject to this requirement, the Council's allocations scheme also reflects local priorities.
- 1.1.4 The Act requires that the Council publish a summary of its allocations scheme to be available free of charge on request – the Council provides summaries in leaflet form. The scheme is available for inspection at the Council's principal office.

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1.2 SOUTHWARK'S EQUALITY AND DIVERSITY STATEMENT

Equality and diversity in Southwark

The diversity of our community is one of our most valued assets. Strong communities will thrive and prosper if individuals and groups are treated fairly, with respect, and given access to rights and services. Our aim is to create an environment where this is possible and to put equality and diversity at the heart of everything we do.

We will promote equality and diversity by:

Building values of mutual respect where individuals have a sense of belonging and where individuals are encouraged to participate and gain full access to services to which they are entitled.

Recognising that some individuals and certain communities are particularly disadvantaged and will require extra recognition and support to deal with their disadvantages.

Our aims are:

To improve the quality of life by improving access to services and by reducing gaps in health, employment, education attainment and community safety – particularly with those most affected.

To improve social cohesion by promoting positive relationships and a sense of community and belonging - by reducing fear and tensions – particularly around race, faith and generational issues, - by promoting a vision in which individuals, groups and communities are properly valued.

To promote citizenship rights and responsibilities. We will do this by ensuring that the Council does all it should in providing real leadership and compliance with its duties and by encouraging its partners, particularly in the public sector to do likewise. We will also do this by acting to protect the rights of individuals and groups by ensuring that abuse, mistreatment or discrimination is recognised and properly dealt with.

To promote a workforce which understands and is committed to achieving these goals and retains the confidence of our local communities.

To deliver this vision we have created a single coherent framework to address all equality and diversity issues and have developed a corporate equalities action plan in order to communicate our intentions and to drive change.

Our policies and plans will be reviewed regularly in order to target effort and resources where it is most needed.

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PART 2: REGISTRATION

2.1 Introduction

- 2.1.1 All approved applications for housing (whether from existing tenants of the Council or new applicants) are entered onto one housing list, comprising both housing applicants and the transfer list.
- 2.1.2 The Homelessness Service will ensure that homeless households for whom the Council has accepted a full duty under s.193 of Part VII (Homelessness) of the Housing Act 1996 have completed a housing application and that any relevant medical factors are appropriately assessed. Such an application will be added to the Council's housing list.
- 2.1.3 Application forms are available for all other applicants for housing, including existing tenants of Southwark Council requiring a transfer, from one of the local housing offices, one stop shops or town hall. A registrations appointment should then be made at the Homeseach Centre to submit the application. Applicants living outside the borough should telephone the Homeseach Centre to request an application form and this can be submitted by post.
- 2.1.4 All applicants will be offered advice and assistance in completing the application form, including translation and interpreting facilities where required. A receipt will be provided when the completed application form is returned to the Council.
- 2.1.5 In addition to completing the application form, applicants should also complete a medical assessment form if they, or any person included in the application, have a medical condition which is relevant to their housing need. This also applies where an applicant is seeking to move to look after someone who is ill, disabled, or requires a live-in carer. Medical assessment forms are confidential and should normally be returned to the Medical Assessment Service in a sealed envelope.
- 2.1.6 Sometimes an applicant is not actively considered for an offer of housing. For details of when this happens (see paragraph 2.23 [Suspensions](#)).

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2.2 Who cannot register

- 2.2.1 Under the Housing Act 1996, as amended by the Homelessness Act 2002, certain categories of **persons subject to immigration control and persons from abroad** do not qualify to be allocated housing by a local authority via the housing list and cannot therefore be registered for housing.
- 2.2.2 Each person who wishes to become a tenant or joint tenant must qualify to register.

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2.3 Persons subject to immigration control

2.3.1 *Definition* - any person who is **not** a British Citizen, or a Commonwealth citizen who has the right of abode in the UK (see [Appendix A](#)), or a citizen of a member country within the European Economic Area (see [Appendix A](#)) is subject to immigration control.

2.3.2 Persons subject to immigration control cannot be registered for housing **unless** they are in one of the following categories:

- A person who has been granted **refugee status**
- A person who has been granted **exceptional leave to enter or remain in the UK prior to 1 April 2003** which is not subject to any condition to maintain and accommodate themselves without recourse to public funds
- A person who has been granted **humanitarian protection or discretionary leave** which is not subject to any condition to maintain and accommodate themselves without recourse to public funds
- A person who has **current leave to enter or remain** in the UK **which is not subject to any time limit or condition** and who are habitually resident in the Common Travel Area. However, a person who is a sponsored immigrant, who has been here less than 5 years and whose sponsor is still alive cannot register for housing.

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2.4 Persons from abroad

2.4.1 In addition, the following persons who are not subject to immigration control but are persons from abroad **cannot** be registered for housing:

- a) a person who is not habitually resident in the Common Travel Area, **unless**
- they are a European Economic Area (EEA) national who is defined as a 'worker' for the purposes of EEC Regulations
 - they are EEA nationals who have a right to reside in the UK under an EEC Council Directive

Note: European Union Accession: nationals of the 8 new member countries (Poland, Lithuania, Latvia, Slovenia, Estonia, Slovakia, Hungary and Czech Republic) are eligible if they have been granted a UK residency order after 12 months registration for employment. Nationals of Malta and Cyprus have full treaty rights.

- b) nationals from Turkey, **unless** they are habitually resident in the Common Travel Area

c) a person who is a national of a country within the European Economic Area and who is notified by the Home Secretary that they no longer have a right to reside in the UK.

2.4.2 From time to time, the Secretary of State may define other categories of person who may or may not register for housing.

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2.5 Other exclusions from the list

2.5.1 In addition, the housing list Inclusion Panel may agree exceptional circumstances that may warrant inclusion on the list. The following persons will not usually be registered for housing:

- a) Persons evicted by Southwark Council or by any other local authority or registered social landlord for rent arrears or other breach of tenancy agreement within the last 5 years. This includes those evicted from temporary accommodation provided for the homeless for these reasons
- b) Persons who have been convicted in criminal proceedings or found liable in civil proceedings of assaulting any Southwark Councillor, officer or agent of the Council or their family.

2.5.2 The Council will of course consider each application on its merits.

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2.6 Housing list inclusion panel

2.6.1 The Inclusion Panel may consider applicants to the housing list in exceptional circumstances who have previously been evicted by Southwark Council or by any other local authority or Registered Social Landlord within the last 5 years for

- rent arrears
- anti-social behaviour or other breach of tenancy agreement

The Panel will consider individual cases on their merit for inclusion on the list.

The Panel will take account of issues such as rent paying history, repayment of any debt owing, their age and circumstances when the eviction took place.

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2.7 Who can register

2.7.1 Subject to the provisions in section 2 above (Who cannot register), anyone can register for housing if

- they are age 16 or over, and
- their current address is their only home, or sole residence, and
- they are not already registered for housing, either on their own or on someone else's housing application.

2.7.2 Southwark Council tenants within the household should be registered either as the applicant or joint applicants, so that when a new tenancy is accepted, their existing home will be vacated.

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2.8 Applicants living with council tenants

2.8.1 Where an applicant is living with a Southwark Council tenant a check will be made prior to registration that, in accordance with Clause 12 of the Tenancy Agreement, the tenant has advised the Council in writing that the applicant is living there. If this has not happened, signed authorisation must be provided by the tenant, confirming that:

- they have allowed the applicant to live in their home
- OR**
- they are asking permission to sublet part of their home.

2.8.2 This also applies to adult children, who were not part of the tenancy agreement, who wish to make a housing application.

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2.9 EXCEPTIONS AND DEFINITIONS

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2.10 Property ownership

2.10.1 Applicants who own property are allowed to register but are asked to declare any interests in land which they have. Their registration is then suspended pending investigation. They must complete a separate form with all details of their property and resources.

2.10.2 Their circumstances will be assessed by the Management Needs Panel, together with any necessary documentation. The Panel will then determine if there are sufficient funds for the applicants to secure housing themselves and assess their eligibility to be activated on the housing list.

2.10.3 The decision as to whether the applicant is eligible to be activated on the housing register is based upon

- whether or not they could reasonably be expected to occupy their property
- their available income and capital to resolve their own housing problems
- their housing needs.

2.10.4 Most property owners will be expected to sell their property and use the capital to buy a suitable property for themselves.

2.10.5 The priority to be granted to any owner-occupier accepted onto the housing list is in accordance with the criteria set out in [para. 3.2](#).

2.10.6 Normally, elderly/disabled owner-occupiers living in conditions of disrepair or in very unsuitable accommodation would be considered for rehousing, although resources available to them would be taken into account (including grants available for repair etc. and the capital value of property). Options other than rehousing by the Council may be more appropriate, and if so they will be referred to the Housing Renewal Section or other appropriate agency. Advice

will also be sought from officers who currently assess the housing needs of the elderly/disabled.

- 2.10.7 Holiday Homes: - an applicant is entitled to be active on the housing list if they own a holiday home. The definition of a holiday home for these purposes is a property not available to the applicant for their normal residence, and that can only be occupied for less than 13 weeks per year. This includes time-shares, caravans, mobile homes and chalets. Otherwise it will be classed as a second home and will need to be taken into account in their needs assessment via the Management Needs Panel.

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2.11 Residents living away from Southwark

- 2.11.1 Where the applicant has been resident in Southwark but is staying away from their home because of domestic violence, racial harassment etc. the Council will seek to verify their circumstances. (may differ for those making a homelessness application).

- 2.11.2 This also applies to applicants who would normally be resident in the borough ([see para. 2.17.3/4](#)) but who, because of circumstances, are not able to: e.g. prisoners who lived in Southwark before they were sent to prison, those in the armed service who lived in Southwark before joining (but see also para. 2.2 [Who cannot register](#) above).

- 2.11.3 The definition of normally resident is having lived in Southwark for at least 3 out of the last 5 years.

- 2.11.4 Applicants should register at the local housing office where they had previously lived.

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2.12 Non-Southwark applicants

- 2.12.1 Applicants not resident in the London Borough of Southwark will be considered for inclusion on the housing list.

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2.13 Rough sleepers

- 2.13.1 Rough sleepers are allowed to register if it can be verified that they are sleeping rough in Southwark. Verification should be by:

- an emergency hostel, or
- an agency for rough sleepers, or
- assessment by the Homelessness Service
- registration with the DSS, or
- day-centre or non-mobile soup kitchen

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2.14 Relationship breakdown

2.14.1 Applicants who are left in a Southwark Council property following a **relationship breakdown** but who are not a tenant already, will be registered in the Relationship Breakdown category for the tenancy of the same property, **providing**

- they are a 'qualifying person' under the Homelessness Act 2002, and
- they qualify to be offered the tenancy under the terms of the *Tenancy Agreement*.

See *Relationship Breakdown Policy*.

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2.15 Carers

2.15.1 Where a carer is left in occupation following the death of a terminally ill tenant **and**

- there are no rights of succession (*see Assignment/Succession Policy*), **and**
 - the original offer of accommodation was made to provide an extra bedroom for the full-time live-in carer on the recommendation of the Medical Assessment Service, **and**
 - the status of the carer is recorded on file, **and**
 - the carer has no alternative accommodation
- they can apply for registration on the housing list and bid in the normal way, providing they are a 'qualifying person' (see [Who cannot register](#) above).

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2.16 Registration without an application

2.16.1 In exceptional circumstances, the Housing Options Manager may put a person on the housing list without any application.

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2.17 Who can be registered with the applicant

2.17.1 All applicants can register the following people as part of their household:

- anyone who would live with them as a partner
- any children for whom the applicant or their partner have a parental responsibility and who live with the applicant at least 50% of the time
- non-dependants where there is an approved medical or social need (supported by the Medical Assessment Service or Social Services).

2.17.2 In addition

- Southwark Council tenants may register any person for whom the tenancy was originally granted, provided they still live there.
- Parents may include on their application non-dependant children normally part of their household in the following circumstances:

2.17.3 Where non-dependant children of the household are in prison they may be included if the expected date of release is within 52 weeks of the date of application.

2.17.4 Higher Education outside London Borough of Southwark: Where non-dependant children live away from home on a temporary basis because of attendance at college/university they may be included regardless of whether they are residing in Halls of Residence or private rented accommodation. The following information must be provided:

- Confirmation of address and course details
- A statement of intent to return the parent(s)' home on completion of the course.

2.17.5 If the applicant wishes to include other people on their housing application they may only do so where authorisation has been obtained by the Housing Options Manager.

2.17.6 Members of the applicant's household must not be registered on another housing application with the Council.

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2.18 Interviews, visits and documentation

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2.19 Interview s

2.19.1 Each applicant will be interviewed by a housing officer once they have completed their application form, the aim of the interview being to

- assist applicants who have difficulty completing the registration form. An interpreter may be arranged if English is not their first language
- ensure the details provided by the applicant are correct. This includes verifying details through documentation provided in line with current procedures
- assist applicants, if required, in making choices about the need for specialist housing such as sheltered/older person's dwelling.

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2.20 Home visits

2.20.1 All applicants who are not Southwark Council tenants will generally receive a home visit and the appropriate form be completed in line with current procedures. The registration cannot generally be entered onto the computer unless a visit form is correctly completed and submitted. The purpose of the visit is to

- check that the applicant (and members of their household) live where they are claiming to live
- check that the details relating to the applicant's present accommodation are correctly recorded on the application form
- check that the form is correctly completed in all aspects
- have the opportunity to offer assistance and advice regarding the applicant's rehousing.

2.20.2 The applicant is expected to arrange access to their home.

2.20.3 Residents in certain local hostels can have their details verified by the hostel manager instead of having a home visit.

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2.21 Document ation

2.21.1 Documentation is required from all applicants before they can register to establish:

- the identity of the applicant and other members of the family
- that the applicant is eligible to register for housing (see [Who cannot register](#) above)
- that the applicant and other household members live where they say they do and the terms on which they live there (e.g. licence, tenancy)
- that children being registered are the responsibility of the applicant or their partner
- that non-dependants have a medical or social need to live with the applicant
- proof of pregnancy.

2.21.2 One of the documents from each of the following areas is necessary to establish this:

- identity - birth certificate, passport, immigration papers;
- residence - electoral register entry, rent book/card, recent bill or credit payment book for gas, electricity or water supply, pension book, confirmation from employer or DSS, tenancy agreement, full driving licence, recent bill for Council Tax or telephone, recent bank statement;
- qualifying/non-qualifying - passport, national identity papers, Home Office documents, proof of housing benefit;

- children - Child Benefit book, Residence Order, confirmation from DSS, Social Services, Health and Education authorities, full birth certificate. Where children have previously been cared for by another person, including an ex-partner, and in the absence of a Residence Order from the courts, a combination of this evidence must be provided. The Council will consider each case on its merits in order to be satisfied that the child(ren) reside at least 50% of the time with the applicant(s).
- non-dependants - confirmation from either Medical Assessment Service or Social Services;
- pregnancy - antenatal card/book from hospital, doctor's letter;
- in cases of threatened eviction - valid Notice to Quit, Court Order.

2.21.3 If an applicant is unable to provide the necessary documents and there appears to be good reason for this, the case should be referred to the Housing Options Manager.

2.21.4 Under the Housing Act 1996 and Homelessness Act 2002, on any matter relevant to the Council's duties regarding the allocation of housing, it is a criminal offence for anyone to knowingly give false information to the Council or to withhold relevant information if reasonably required to give it.

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2.22 Entry on the housing list

2.22.1 Where the Council decides not to register an application for housing, the applicant will be informed in writing of the reasons and of their right to a review of the decision.

2.22.2 The Council will inform in writing any person put on the housing list without an application form having been submitted.

2.22.3 The Council will inform applicants in writing when they are entered onto the housing list. At the same time applicants will be told of their responsibility to inform the Council about any changes in circumstances relevant to their application for housing.

2.22.4 Applicants will be notified in writing of any amendments to their entry on the list with the exception of minor changes made at their own request.

2.22.5 Applicants will be given information about their relative priority for rehousing when their application is placed on the housing list and periodically thereafter.

2.22.6 Information on the housing list is confidential. Upon request, applicants will be supplied free of charge with a copy of their own entry on the list.

2.22.7 The fact that a person is an applicant on the Council's housing list shall not be revealed to any other member of the public.

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2.23 Suspensions

2.23.1 Suspension is when an applicant is unable to take part in the bidding process or receive direct offers of accommodation. This can happen for a number of reasons, including:

- fulfilling of residence qualification - applicants can register on the housing list immediately they move into the borough but remain suspended until they have lived in Southwark for six months
- pending a medical assessment
- property owners awaiting a Management Needs Panel decision
- investigation of inconsistent details on the application
- awaiting proof of change of circumstances before amending registration details
- applicant has notified that they are seeking their own accommodation
- applicant is exercising their Right to Buy (the suspension of a transfer application only takes place once an applicant has formally accepted the Council's Right to Buy offer)
- applicant has rent arrears (see para. 2.25 [Rent arrears](#) below)
- homeless applicants in certain forms of temporary accommodation
- out of borough applicants – whilst demand for properties from local applicants remains far higher than supply, the Council reserves the right to suspend applications from applicants elsewhere
- serial refusers – the Council reserves the right to suspend applicants for six months from the bidding process in cases where they have refused ten offers of accommodation following successful bids
- simultaneous housing list / homelessness applications – the Council reserves the right to temporarily suspend one application for rehousing in cases where an applicant makes a second simultaneous application. A housing list application will normally remain suspended until the homelessness application for the same applicant has been determined. At this point the applicant will be entitled to the highest applicable priority under the policy.

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2.24 16/17 Year olds

2.24.1 The registration of 16 and 17 year olds will remain suspended until they have reached the age of 18 unless they have a child or are pregnant, or

- they are accepted as a priority nomination from Social Services

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2.25 Rent arrears

2.25.1 In general, council or housing association tenants are not eligible for a move if they:

- Have an outright possession order against them for rent arrears
- Are in substantial breach of a suspended possession order against them
- If in Band 3 or 4, owe the Council rent or Council Tax (current or former)

2.25.2 If agreed by the Area Housing Manager, any tenant giving up at least one bedroom may be awarded a transfer even if the tenant has arrears. This will only apply where an arrangement to pay off the arrears has been kept for twelve months up to the date of transfer. (See [para. 3.4.3](#) below and *Rent Arrears and Variation of Rent Policy* also).

2.25.3 No application with former tenant arrears or Council Tax arrears from a previous Southwark Council or housing association address will be considered for a tenancy until this debt is cleared, unless they have been granted priority for registration in Bands 1 and 2. This includes arrears accrued in temporary accommodation provided by the Council.

2.25.4 Arrears due to Housing Benefit error/delay will not prevent a transfer.

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2.26 Ex-tenants of LB Southwark and housing associations

2.26.1 Before an application is registered on the system, checks are made to see if the applicant or other members of their household have ever been a tenant of Southwark Council before. If they have, the following applies:

- Applicants who take up and relinquish an LBS tenancy will not be considered for an offer within 12 months of the date of their relinquishment, unless there is a genuine acceptable reason for the relinquishment
- A check will be made for rent arrears owed if a tenancy was relinquished in the last 5 years. This applies also to housing association tenants. Arrears that have been written off will be 'written back on' (where not statute barred). If there are any outstanding arrears an offer of accommodation will not be made and the registration will be suspended until the arrears are cleared.

2.26.2 Difficult or exceptional cases can be referred to the Housing Options Manager including those who may qualify for priority in Bands 1 and 2.

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2.27 Removal from the housing list

2.27.1 Applicants can apply to have their entry removed from the housing list.

2.27.2 The Council can, at its own discretion and in line with its normal policies, remove someone from the housing list. The Council has a legal duty under Part VI of the Housing Act 1996 and Homelessness Act 2002, to remove an applicant from the Housing Register if it appears that they are not 'qualifying persons' under the Act.

2.27.3 Before removing someone from the housing list, the Council will write to the applicant requesting the information necessary to assist a decision. The applicant will be given at least 28 days to respond.

2.27.4 From time to time, the Council will review the entries on the housing list by writing to applicants to establish whether they wish to remain on the list. Applicants who do not respond will be removed from the list.

2.27.5 Applications can only be reinstated within a period of 3 months following removal. After this time, a new application has to be made.

2.27.6 Where the Council removes an applicant from the list, other than at the applicant's request, the applicant will be informed in writing of the decision and the reasons for it.

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2.28 Right to review

2.28.1 If the Council decides

- not to put someone on the housing list
- to remove someone from the list (other than at the applicant's own request) the applicant will be informed in writing of the reasons and of their right to a review of the decision and of the procedure to be followed.

2.28.2 The applicant, or someone acting on their behalf, may make written representations to the Council for consideration as part of the review.

2.28.3 Reviews will be carried out by a senior housing officer who was not involved in the original decision.

2.28.4 Applicants will be notified of the results of a review within 8 weeks of the original request for a review unless the applicant has agreed a longer period in writing.

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2.29 Difficult and exceptional cases

2.29.1 Ultimately the Housing Options Services have responsibility for deciding who is or is not entitled to register for housing. Any difficult or exceptional cases should be referred to the Housing Options Manager for a decision.

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PART 3: PRIORITY ON THE HOUSING LIST

3.1 Introduction

- 3.1.1 The Council is required by the Homelessness Act 2002 to give 'reasonable preference' to certain groups of applicants. The Council puts all applicants for housing onto one housing list, which comprises both new applicants and transfer applicants. All registered households are grouped together in four Bands according to the priority awarded. Band 1 has the highest priority and Band 4 the lowest.
- 3.1.2 The date the relevant priority is awarded becomes the registration date within that Band. For example, the date medical priority is awarded will then be the start date within Band 3.
- 3.1.3 Priority for an offer will then be determined by Band and the relevant registration date in that Band. No distinction is made between the different priority reasons within each Band, only the date registered in the said Band.

Applicants can request a review of their Band and their registration date within the Band within 21 days of the date of the letter notifying them of their registration on the housing list.

- 3.1.4 Applicants who are not normally resident in Southwark and who have not lived in the borough for the last 6 months will not normally be considered for inclusion in Bands 1, 2 and 3 (see para. 2.23 [Suspensions](#)).

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3.2 Prioritising applicants

BAND 1 includes:
UNDER-OCCUPIERS – see para. 3.4 SOCIAL SERVICES NOMINATIONS (FAMILIES) – see para. 3.6 PROPERTY FACTORS (NO RIGHT TO RETURN) - see para. 3.5 TENANTS – FIRE/FLOOD CASES - see para. 3.7 STATUTORY OBLIGATION - see para 3.8
BAND 2 includes:
SHNAG - SINGLE HOMELESS NOMINATIONS AND ALLOCATIONS GROUP - see para. 3.10 URGENT MEDICAL PRIORITY - see para. 3.9 SOCIAL SERVICES NOM (CARE LEAVERS) - see para. 3.6 PERSONAL PROTECTION/HARASSMENT – see para. 3.11 MULTIPLE NEEDS – see para. 3.12

BAND 3 includes:
HOMELESS WITH DUTY TO ACCOMMODATE – see para. 3.13
OVERCROWDED - see para. 3.14
MEDICAL PRIORITY – see para. 3.9
RELATIONSHIP BREAKDOWN - see para. 3.15
UNSANITARY CONDITIONS - see para. 3.16
BAND 4 includes:
ALL OTHER APPLICANTS

3.2.1 Applicants are prioritised in each Band according to the date they became registered in it, irrespective of their priority reason.

3.2.2 Applicants for sheltered or adapted property have separate lists. (see paras. [3.17 and 3.18](#)).

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3.2.3 Homeless applicants to whom a duty for rehousing has been accepted by the Council under Part VII of the Housing Act 1996 as amended by the Homelessness Act 2002, who then opt to move to a private rented home and become unintentionally homeless again within two years, will be granted their original level and date of priority on the housing list.

3.3 Explanation of priority reasons

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3.4 Under-occupation

3.4.1 This priority reason applies to **some** Southwark Council tenants whose present home is too big for the assessed needs of their household. Housing association under-occupiers may also be eligible for this scheme. Full details are set out in Part 6 - Special Allocations Schemes: Under-Occupation Initiative, below.

3.4.2 Participation by tenants in this scheme is on a voluntary basis and the following incentives are offered:

- An extra bedroom surplus to assessed needs as long as the new home is smaller by at least one bedroom than the home being vacated
- A grant to assist with reasonable removal expenses (subject to financial availability)
- A redecoration allowance (subject to financial availability)

3.4.3 With the agreement of the Area Housing Manager, an under-occupying tenant in rent arrears giving up at least one bedroom may be awarded a transfer, provided an arrangement to pay off the arrears has been adhered to for 12

months up to the date of transfer. (See [para. 2.25.2](#) and *Rent Arrears and Variation of Rent Policy* also).

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3.5 Property factors

3.5.1 'Property factors' priority reason applies to applicants who are living in a property, which is subject to:

- Demolition, extensive alteration as result of a regeneration scheme (see "Part 6 - Special Allocations Schemes: rehousing tenants / homeowners on regeneration schemes" below)
- Closing Order
- Environmental Health Action – as advised by the Environmental Health /Legal Departments.

and to individual council tenants whose properties are subject to

- rehabilitation
- extensive repairs

and who cannot remain in the property for the duration of the works.

3.5.2 In addition 'Property Factors' applies to tenants in properties where long leases held by the Council are coming to an end e.g. Dulwich College properties.

3.5.3 For council tenants inclusion in this category is decided by the Area Housing Manager and for non-council tenants by the Housing Options Manager.

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3.6 Social services nominations

3.6.1 Social Services priority nominations – applications referred from Social Services on an individual basis, possibly following a Community Care assessment. Inclusion in the category is dependent on the referral being accepted by the Housing Options Manager under the joint Working Arrangements between the two departments, **and** housing being deemed essential within a 6-month or reasonable period. A copy of the joint protocol with Adults' and Children's Services is available on request from the Homesearch Centre.

3.6.2 The following households will be accepted for rehousing through this procedure:

- young people or adults in council care or placement who are ready to live independently
- families who need rehousing in order to facilitate their caring for an adult previously in residential care, or for a child previously cared for elsewhere
- households who need rehousing due to complex and serious family problems.

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3.7 Tenants – Fire/Flood

Tenants of the Council who are unable to return to their tenancy due to extensive works required following a fire or flood.

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3.8 Statutory obligation

Inclusion applies to

- applicants who are statutorily overcrowded as defined in the Housing Act 1985 (Part X).
- applications where Court Order applies
- other legal obligations the Council has to discharge through urgent rehousing as assessed by the Housing Options Manager.

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3.9 Urgent medical priority/medical priority

Applicants who suffer from an illness or disability will be assessed by the Medical Assessment Service. These applications can be given the following priority:

Band 4

Households which include a person (or persons) who suffers from an illness or disability whereby a move to other accommodation would be desirable for the household, but where remaining in their present accommodation would not have an adverse effect upon the illness or disability of the person or persons concerned. Nor would remaining in the present accommodation interfere with any existing or proposed medical treatment.

In such cases, a move to new accommodation would not improve health, nor render any treatment more effective.

Band 3 - Medical Priority

Households where there is a clear objective need for a move, because they include a person (or persons) whose illness or disability is either:

- (i) made worse by their present living conditions, or
- (ii) where a move to more satisfactory accommodation is likely to result in an improvement to health.

Band 2 – Urgent Medical Priority

Households which include a person (or persons) who is suffering from a serious illness or disability, and whose needs cannot be met without an urgent move to more suitable accommodation, and where remaining in the existing accommodation would present a risk to life, or a risk of serious deterioration in health.

This category also includes persons who are undergoing medical treatment which cannot, or cannot conveniently, be undertaken or carried out in their present accommodation, and where the failure to have such treatment, or to have it fully and properly administered, places them at risk of serious deterioration.

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3.10 SHNAG – Single homeless nominations and allocations group

Arrangement whereby some voluntary sector agencies offering support and resettlement services to single homeless people can refer certain residents to the Council for permanent housing when appropriate.

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3.11 Personal protection/harassment

This priority reason applies to Southwark Council tenants who have been assessed as being at significant risk in their current home. This can be for reasons of harassment, racial harassment, police witness protection etc. Priority can only be granted by the Management Needs Panel. This panel may also consider Southwark Council tenants in other exceptional circumstances for priority with rehousing.

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3.12 Multiple needs

Applicants who qualify to be registered in Band 3 for more than one of the following points:

- Homeless or Overcrowded
- Medical Priority
- Insanitary Conditions

will be awarded increased priority for multiple needs and be registered in Band 2.

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3.13 Homeless with duty to accommodate

Applicants to whom a duty for rehousing has been accepted by the Council under Part VII of the Housing Act 1996 as amended by the Homelessness Act 2002.

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3.14 Overcrowding

3.14.1 This category applies to all applicants who are short of 1 bedroom or more in their current home.

3.14.2 Regard will be taken of accommodation available to all members of the applicant's household:

- Unless exceptional circumstances apply, the household will be assessed as if they were living in the most favourable property available to any member of the household.
- If a member of the household owns a property, they will not be included in the application for housing until they have been assessed as in [Property ownership](#), para 2.10 above.

This also applies where households are living apart.

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3.15 Relationship breakdown

This only applies to current Southwark Council tenants who have invoked the provisions of the Tenancy Agreement (Sec. 3). If the Area Housing Manager is satisfied that the tenants qualify under the criteria set out in the Tenancy Agreement, then they may be registered in the Relationship Breakdown priority.

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3.16 Unsanitary conditions

Applicants whose current home

- lacks bathroom facilities or kitchen facilities or inside WC
- lacks permanent hot water supply or electrical supply

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3.17 Sheltered housing applications

3.17.1 There is a separate list for applicants who need sheltered housing.

3.17.2 Sheltered Housing vacancies are advertised in the same way as other council housing. Applicants who have been assessed as needing this type of housing are invited to bid in the normal way.

3.17.3 Assessments will be carried out for suitability for sheltered housing before agreeing registration on the Council's housing list for this type of accommodation. Accepted applications will normally be registered in Priority Band 4 – but the Sheltered Housing Panel may agree additional priority for inclusion in Bands 3 or 2.

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3.18 Applications for adapted homes

3.18.1 There is a separate list for applicants who need adapted housing.

3.18.2 Adapted housing vacancies may be advertised and bids invited from those registered for this type of accommodation. The Council however reserves the right to make a direct offer to an applicant where the property uniquely meets their needs.

3.18.3 An assessment for an adapted home will be carried out by one of the Council's Occupational Therapists or the Medical Assessment Service before agreeing registration on the Council's housing list for this type of accommodation. Where the assessment confirms the need for adapted housing, applicants once registered, may bid for this type of unit when advertised through the Homesearch scheme. Where a property uniquely meets the needs of an applicant as agreed by the Disability Panel, then an offer can be made direct to the applicant.

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PART 4: CHOICE FOR APPLICANTS

4.1 Introduction

- 4.1.1 Southwark Council will normally advertise the vacancies that become available for letting and make these available to applicants registered on the housing list, apart from the circumstances set out below.
- 4.1.2 The Council may make an offer of accommodation directly to an applicant registered on the housing list. These circumstances will include:
- dwellings adapted for applicants with disabilities
 - National Witness Protection Scheme moves
 - tenants who need to move urgently on grounds of personal protection/harassment and who have been provided with temporary accommodation arranged through their local Area Housing Office
 - tenants and homeowners to be rehoused as part of a regeneration scheme; (see “Part 6 - Special Allocations Schemes: rehousing tenants / homeowners on regeneration schemes” below)
 - tenant to be moved temporarily to allow extensive works to take place to their home
 - in order to enable the Council to manage the supply of temporary accommodation, offers may be made directly to homeless applicants accepted by the Council under homelessness legislation, who have occupied temporary accommodation for at least 6 months
 - exceptional circumstances which fall outside the normal provisions of the Council’s Lettings Policy, as agreed by the Housing Options Manager.
- 4.1.3 As an alternative to making direct offers as set out above, the Council reserves the right to issue instead a priority card to some of the above applicants. This will allow the Council to manage the supply of temporary accommodation for homeless households as well as maximise the number of properties advertised under the Homesearch scheme.
- 4.1.4 An offer of a new home to a household on the housing list will depend on:
- an active application on the housing list i.e. one which is not suspended ([see para. 2.23](#)).
 - the composition of the applicant’s household
 - choices or bids made by the applicant
 - the priority that council policy gives to different types of housing need
 - medical recommendations following an assessment by the Medical Assessment Service and specialist assessments by the Disability Panel and Sheltered Assessment Panel (where applicable)
 - the size and availability of properties.

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4.2 Successions and assignments

- 4.2.1 The Council may from time to time allow for successions and assignments of tenancies in the circumstances set out in sections 12 and 13 of the Tenancy Agreement, and in line with current legislation.
- 4.2.2 Second Succession: In the case of an entitlement to a 'second succession' under Southwark Council's Tenancy Agreement, and providing the person is a 'qualifying person' under the Housing Act 1996, the appropriate arrangements will be made.

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4.3 Bids

- 4.3.1 In general, vacant properties will be advertised. Generally, all applicants will be able to bid for the full range of quality and type of property available. Adverts may state though if a property is targeted at certain applicants, e.g. those registered in a specific Band or over a certain age or at households with a specific medical need (for example, ground floor).
- 4.3.2 When a garden or ground floor property is advertised, advertisements may indicate that some priority will be given to those with a ground floor or garden medical recommendation from the Medical Assessment Service. This will be applied where such an applicant is amongst the first three shortlisted applicants and within the same Band as the highest application on the shortlist, or in the next Band below.
- 4.3.3 The Council may allow applicants registered on the housing list to make more than one bid in every advertising cycle.
- 4.3.4 Sometimes an applicant is suspended and therefore not able to participate in the bidding process. For details of when this happens (see para. 2.23 [Suspensions](#)).
- 4.3.5 From the bids received, the applicant in the highest priority Banding, with the earliest registration date within that Band, will be invited to view the property.
- 4.3.6 Before a bidder is invited to view a property, their rent and Council Tax account will be checked (if they are a council or housing association tenant) to ensure there are no outstanding arrears. Transfer applicants in arrears will be suspended and the next highest-ranking bidder will be invited to view. The exceptions to this are tenants registered in Priority Bands 1 and 2 (see para. 2.25 [Rent Arrears](#)).
- 4.3.7 The Council reserves the right to withdraw properties from the bidding process following advertisement.

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4.4 Viewing a property

4.4.1 Viewing takes place after the bidding process.

4.4.2 The Council may arrange for multiple viewings. This means that more than one applicant will be invited to view the same property (for example, a shortlist of the first three highest priority bidders). The applicant with the highest priority will be offered the property if they are interested. If refused, the property will then be offered to the next highest priority bidder, and so on.

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4.5 Change of circumstances

4.5.1 Checks will also be made at the time of the offer to ensure that the household details are correct and the property is suitable for the household size. If a household's current housing situation is different from their housing registration details, then a housing offer may be withdrawn. The application may be suspended until the applicant provides proof of their change of circumstances (see para. 2.23 [Suspensions](#)).

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4.6 Size of property

4.6.1 Applicants will be expected to bid only for property which suits the size of their household. The Council calculates the suitable size as follows:

- one bedroom for any person 16 or over except for those living as a couple who are given one bedroom between them
- one bedroom for two children under 16 unless they are of opposite sexes and the eldest is 10 or over, in which case they get a bedroom each
- one bedroom for any non-family member, irrespective of age

4.6.2 The size of the bedroom is also taken into account:

- rooms of less than 6.5 square metres are not counted as bedrooms
- rooms 6.5 -10 square metres are considered suitable for one person
- rooms bigger than 10 square metres are considered suitable for two people.

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4.7 Extra bedroom

- a) The Medical Assessment Service may recommend the need for an extra bedroom, e.g. where an applicant, on the grounds of their physical disability, requires a carer to live with them.
- b) Southwark Council tenants who are under-occupying large accommodation (three bedrooms plus) by two or more bedrooms will be eligible to an extra bedroom above their housing needs.

4.7.1 Households may opt to bid for a property which is smaller than the council rules as set out in [para. 4.6](#), providing they will not be statutorily overcrowded.
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4.8 Applicants who fail to bid

4.8.1 The Council may from time to time review applicants in Bands 1, 2 and 3 who have not taken part in the bidding process and arrange an interview if appropriate.
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4.9 Housing associations / co-operatives / tenant management organisations (TMOs)

4.9.1 The Council will normally advertise the vacancies that become available for nomination, apart from the circumstances set out in [para. 4.1.2](#).

4.9.2 Applicants on the housing list will be invited to bid in response to advertisements.

4.9.3 Nominations will be forwarded to the organisations as agreed under the relevant nominations agreement.

4.9.4 The organisation will normally offer the accommodation to the applicant with the highest priority, under their current nomination agreement.
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4.10 Referrals to other landlords and exchanges

4.10.1 **Cross-Borough Moves:** where Southwark is participating with other local authorities to encourage cross-authority moves, the exporting borough will apply their own lettings policy to determine the priority of the applicant referred to Southwark.

4.10.2 Details of opportunities to move out of Southwark are available at the Homesearch Centre.

4.10.3 **Seaside and Country Homes:** nominations can be made for tenants of pensionable age who wish to move to one of the properties available under this scheme.

4.10.4 **Mutual Exchange:** council or housing association tenants have the right to exchange with a similar tenant and can organise this themselves or can apply through internet based schemes. Southwark Council is a member of House-Exchange and council tenants can register free of charge on www.southwark.houseexchange.org.uk The permission of both landlords is required - see also *Mutual Exchange Policy*.
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PART 5: OFFERS AND REFUSALS

Once an offer has been made and accepted, the new tenancy offered must be the sole residence of all members of the household - any existing tenancy must be relinquished (checks will be made following acceptance of an offer to ensure that other tenancies are relinquished).

5.1 Lettable standard

5.1.1 Applicants must be advised of the minimum lettable standard at the time of receiving an offer of a property.

5.1.2 The lettable standard is the minimum required condition for properties offered for letting.

5.1.3 No property shall be let or offered unless it is/has:

Internal

- clean and free from rubbish
- in reasonable decorative order; although the Council is not generally able to redecorate vacant properties it will remove dirty, torn or stained wall coverings and apply lining paper. A decoration allowance may be offered where decoration is poor.
- no signs of dampness or mould growth in the property
- windows in sound condition, wind and weatherproof (no broken or cracked glazing), which open and close satisfactorily. N.B. Old windows will be adjusted and repaired, as necessary. Replacement is undertaken on a programmed basis.
- ground floor windows which will be lockable and upper floor windows which have restrictors
- ceilings in sound condition with no polystyrene tiles
- floors which are in a good state of repair, with carpets or laminated flooring provided by the previous occupier left in place if they are clean and in good condition. (It will be the tenant's responsibility to look after them).
- skirting boards in place throughout
- central heating throughout the property and hot water supply
- electric sockets, switches and wiring which will be tested and comply with regulations
- pipework which is safe and serviceable, with no leaks, stopcocks which work properly (the tenant will be advised of their location)
- washing machine valves in good working order and capped off
- all taps working effectively and an adequate supply of wholesome water
- all doors in good condition which open and close satisfactorily, and the front door secure, with Yale and mortice locks or an integrated/ multi-point locking mechanism for composite or upvc doors. The Council will change the Yale cylinder to the front door but will replace the back door lock only if it opens to a publicly accessible area.
- a clean and hygienic kitchen which has the following:

- sound work surfaces, tiling and flooring, two courses of tiles to work surfaces, with sound mastic joints,
- a hot and cold water supply, sink with drainer,
- space for cooker, washing machine and tall fridge/freezer, if space allows,
- gas or electric cooker point
- plumbing connections will be provided for a washing machine
- kitchen units – minimum two base units and two wall units, in satisfactory condition, with all doors and drawers matching and working satisfactorily.
- a bathroom which has:
 - sanitary ware which is clean and without cracks, a bath or shower plus W.C. and wash hand basin
 - minimum two courses of tiling to bath and washbasin, sound mastic joints and sealant around bath or shower which is clean and in good condition
 - hot and cold water supply to bath/shower
 - the W.C. pan which is firmly fixed to the floor, has a new toilet seat and the flush working effectively

External

- in sound structural condition
- effective drainage for surface, waste and foul water
- security grilles fixed by previous tenant removed
- the roof in satisfactory condition, not leaking and without missing tiles
- no rubbish in the immediate vicinity – balcony, stairwell or entrance hall
- gardens cleared of rubbish and not overgrown
- fencing - walls, fences and gates in sound condition
- no graffiti in the immediate vicinity – balcony, stairwell or entrance hall

5.1.4 Where the applicant advises that the lettable standard has not been reached, the applicant should be offered a joint inspection with a housing officer.

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5.2 Refusals following a successful bid

5.2.1 Where an applicant does not keep an appointment to view a property, or refuses it, the next highest-ranking bidder will normally be offered the property. (see para. 4.4.2 [multiple viewings](#)).

5.2.2 Where an applicant has successfully bid for a property and then refuses it, generally no penalty will apply. In most cases, the applicant will be free to bid again according to the normal bidding process. However, see [para. 2.23.1](#) regarding 'serial refusers'.

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5.3 Refusals following a direct offer

5.3.1 If a direct offer of a property is refused unreasonably, sanctions will be applied as follows:

- Adapted dwellings – no penalty
- Rehousing tenants / homeowners on regeneration schemes – possession proceedings will be considered
- Mobility scheme applicants – will not normally be considered for further offer
- Homeless – discharge duty under Part VII and applicants will lose their homeless priority
- Exceptional Circumstances: each case will be considered on merit

5.3.2 A refusal is considered unreasonable if the property offered

- Is the correct size for the households needs as per council policy
- Takes into account any medical recommendations

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5.4 Appeals

5.4.1 Applicants made a direct offer can appeal against a decision of ‘unreasonable refusal’ on the following grounds only:

- where a change in the applicant’s circumstances has not been accepted as grounds for reasonable refusal
- if there are new medical factors not previously assessed by the Medical assessment Service
- personal safety: where there is evidence that it would be unsafe for the applicant to live in the area for which the offer was made, or upon viewing the offered property the applicant or a member of their household had personal experience of an event which has caused the lack of safety
- other exceptional circumstances – for example, where there is documented evidence that it is essential that the person lives in a different area or type of property
- all homeless applicants have a right to appeal should they so wish, regardless of the reason. (This does not preclude their right to request a review of any decision that the Council has discharged its homeless duty by making an offer of permanent housing.)

5.4.2 All appeals should be accompanied by documentary evidence unless there is a good reason it cannot be provided. The applicant may have up to a maximum of 72 hours to gather their documentary evidence, the actual time allowed being at the discretion of the local housing officer and taking into account all relevant circumstances.

5.4.3 The appeal form should be completed and submitted at the time of refusal, or within 24 hours in exceptional cases.

- 5.4.4 Where there appear to be grounds for appeal, the appeal will be heard by an Appeal Panel whose decision will be final. However, if new information becomes available which was not available at the Panel, the Housing Options Manager may refer the matter to the Head of Community Housing Services for consideration.
- 5.4.5 Offers are held open during the appeals process only for applicants accepted as homeless under Part VII Housing Act 1996. Where the Panel reject an appeal from a homeless applicant, and the applicant continues to refuse, the property will be re-offered and held for a period of 48 hours in order for the applicant to re-consider their decision in the full knowledge of the consequences. For all other categories of applicant the offer will not be held open during the appeals process, other than under exceptional circumstances.
- 5.4.6 Where an applicant does not keep an appointment to view a direct offer of accommodation or otherwise indicate their intention as to the offer this will be treated as an unreasonable refusal. However, if the applicant can prove good reason for failure to keep the appointment, the offer can be reinstated at the discretion of the Housing Options Manager.
- 5.4.7 Applicants being offered housing association or co-operative housing have the same right of appeal as those offered council properties.

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PART 6: SPECIAL ALLOCATIONS SCHEMES

Special lettings schemes are only permitted with the express consent of Members

6.1 Rehousing tenants / homeowners on regeneration schemes

Further information regarding rehousing tenants/homeowners on the Aylesbury and Heygate Estates is included in paras. [6.1.14](#) and [6.1.15](#) below.

6.1.1 The Council's policy for rehousing tenants / homeowners on regeneration schemes covers all regeneration schemes where tenants do not have the option to return to their homes due to e.g. demolition, extensive alteration to the property. It sets out the rules around:

- The identification of properties affected
- The identification of replacement properties
- The priority and process for letting these properties

6.1.2 Information on this policy and any additional issues relevant to their particular rehousing scheme will be made available to the tenants in each regeneration scheme before their housing needs assessment takes place.

Each regeneration scheme will have an agreed consultation process in place prior to the start of rehousing the tenants.

6.1.3 Under this policy each tenant to be rehoused as part of a regeneration scheme can opt for:

One of the estate replacement properties to be offered to them **or**
An existing property elsewhere in the borough (normally by taking part in Southwark Homesearch bidding)

6.1.4 Tenants within a regeneration scheme who are under-occupying their property may qualify for an extra bedroom in their new home. This entitlement to an extra bedroom will be determined by the current provisions of the Under-Occupation Policy. (See sections [3.2](#), [3.4](#) and [6.3](#)).

6.1.5 Tenants in a regeneration scheme who are in arrears with their rent payments are eligible for a transfer providing:

- The tenant is complying with the terms of a suspended possession order
- No outright possession order has been granted to the Council.

6.1.6 For each regeneration scheme requiring tenants to be rehoused, the housing needs of all tenants will be assessed as part of the planning process for the scheme. Replacement properties (which can be new or refurbished depending on the nature of the scheme) for all tenants will be planned and designed based on these specific needs. Of necessity this assessment will take place some time before the new properties are ready for occupation. Every effort will be made to limit the time between the needs assessment and the start of works on the new or refurbished properties.

- 6.1.7 The final assessment of tenants' housing needs will be based on the information supplied on the rehousing application form and as agreed for registration on the housing list.
- 6.1.8 In order that the Council is able to meet its contractual obligations for the regeneration of an estate, tenants who have not been successful in obtaining a move under the Homesearch scheme within a certain period, will be made a 'direct offer' of alternative accommodation. Should the tenant not accept this offer as a reasonable one, the Council may pursue possession proceedings through the Court as a last resort. The same will apply to tenants who do not accept their allocated 'estate replacement' property. Tenants will normally be made only one direct offer, unless it is found to be 'unsuitable' under housing legislation.
- 6.1.9 If the needs of the household change between registering the rehousing application and the replacement property becoming available, the tenant can be registered for move under the Homesearch scheme. Again, if no offer of alternative accommodation is made immediately available, then the tenant will be expected, in the first instance, to move to the replacement property offered as part of the regeneration scheme. The transfer application will need to be amended with the details of the new home. Any final offer of alternative accommodation to a tenant in a regeneration scheme will need to be 'suitable' as required under housing legislation.
- 6.1.10 Replacement properties may be managed by the Council or by a partner agency, e.g. housing association, depending on the nature of the regeneration scheme. Whether or not there is a choice of landlord for individual tenants will depend on the nature of each regeneration scheme.
- 6.1.11 The development of replacement properties will usually be planned in phases (unless inappropriate). The number and size of the properties in each development phase will match exactly the assessed housing needs of all tenants to be rehoused as part of the equivalent live rehousing phase. This matching of each development phase with each part of the rehousing programme will prevent other housing applicants on the Council's housing list from being disadvantaged by the Council's housing regeneration programme. Newly developed homes not taken up by tenants to be rehoused in the relevant live rehousing phase will normally be offered to other applicants on the Council's housing list.
- 6.1.12 In appropriate circumstances the Council will take account of the rehousing needs of leaseholders or freeholders whose properties have been acquired as part of a redevelopment initiative. This will apply only if the leaseholder or freeholder is not in a position to purchase another property on the open market in Southwark. Such cases are referred to Management Needs Panel for determination in the same way as other property owners who apply for housing to the Council. Where the Panel is satisfied that the applicant does not have sufficient resources to purchase another property in Southwark they will be made a suitable offer of accommodation.

- 6.1.13 Home loss compensation and disturbance expenses will be paid to tenants having to move from their home because of a regeneration scheme. Entitlement to these payments will usually commence from the rehousing start date for blocks or parts of the estate based on an agreed phasing plan.

(See para. 6.4.3 in Rent Arrears and Variation of Rent Policy also).

Rehousing tenants / homeowners on Heygate and Aylesbury estate regeneration schemes

- 6.1.14 It may be necessary on the Heygate and Aylesbury Estates regeneration schemes for households to move to an existing property elsewhere in the borough (via the Homeseach scheme as above) followed by an offer of one of the estate replacement properties when they are ready.
- 6.1.15 For Aylesbury and Heygate regeneration schemes, any under-occupying qualifying household, including those under-occupying a two bedroom property, would qualify for an extra bedroom above need in the property they move to.

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6.2 Dulwich college properties

The following applies only to council tenants living in properties which are on lease to the Council from Dulwich College. As only a few years remain on the leases, tenants are required to move.

- 6.2.1 Tenants in College properties can bid for properties that reflect their reasonable rehousing aspirations. Any direct offers made will accord with each tenant's preferences, area of choice and vulnerability taking into account available resources. In the light of the age and infirmity of the tenants involved Social Services and other agencies to be involved as appropriate. In addition, all other tenure possibilities are to be explored.
- 6.2.2 Where the tenant is currently under-occupying, they are entitled to an extra bedroom provided that they are not in rent arrears.
- 6.2.3 Tenants are to receive up to 3 offers following successful bids. After this they may be suspended pending review of their case by the Housing Options Manager and the Authorised Officer.
- 6.2.4 No tenant is to be housed in leased property without a full explanation of their tenure rights.
- 6.2.5 None of the properties on lease from Dulwich College will be relet in the last 7 year period of the lease.

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6.3 Under-Occupation Initiative ('Small is Beautiful' scheme)

See also [paras. 3.2 and 3.4](#), and [6.1.4](#) and [6.1.15](#) above.

6.3.1 Southwark Council tenants within the borough are entitled to Under-Occupation priority in Band 1 if their present home is too big for the assessed needs of their household. Housing association tenants are also eligible for this category where their landlord agrees that Southwark will have nomination rights to the resulting void in addition to the usual nomination rights. The following categories of tenants qualify for the Under-Occupation Initiative:

- Tenants under-occupying two bedroom or larger properties and want to move to a home with fewer bedrooms

6.3.2 The following incentives are currently available to those in the scheme:

- An extra bedroom surplus to needs where the move will result in the tenant releasing at least one bedroom as a result of the move
- Reasonable removal expenses will be met on a sliding scale depending upon the size of the property **vacated** (subject to financial availability).
- Redecoration allowance on a sliding scale (subject to financial availability).

6.3.3 Any tenant qualifying under this scheme for priority rehousing will be entitled to the financial incentives applicable at the time.

6.3.4 The Housing Options Manager will consider, on an individual basis, splitting households to facilitate a move and giving both parties the Band 1 priority status. Only the tenant is eligible for the financial and extra bedroom incentives.

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APPENDIX A

DEFINITIONS OF AREAS FOR THE PURPOSE OF PART 2: REGISTRATION (2.1 - 2.3)

Commonwealth countries

Antigua & Barbuda	India	Saint Vincent & the Grenadines
Australia	Jamaica	Seychelles
The Bahamas	Kenya	Sierra Leone
Bangladesh	Kribati	Singapore
Barbados	Lesotho	Solomon Islands
Belize	Malawi	South Africa
Botswana	Malaysia	Sri Lanka
Brunei	Maldives	Swaziland
Cameroon	Malta	Tanzania
Canada	Mauritius	Tonga
Republic of Cyprus	Nauru	Trinidad & Tobago
Dominica	New Zealand	Tuvalu
Fiji	Nigeria	Uganda
The Gambia	Pakistan	Vanuatu
Ghana	Papua New Guinea	Western Samoa
Grenada	Saint Christopher & Nevis	Zambia
Guyana	Saint Lucia	Zimbabwe

European Economic Area states

Austria	Greece	The Netherlands
Belgium	Iceland	Norway
Denmark	Ireland	Portugal
Finland	Italy	Spain
France	Liechtenstein	Sweden
Germany	Luxembourg	United Kingdom

Signatory states to the European Convention on Social and Medical Assistance and the Council of Europe Social Charter

All European Economic Area states plus Turkey, Malta, and Cyprus.

Common Travel Area

United Kingdom, Republic of Ireland, Channel Islands, and Isle of Man.

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Questions on overcrowding in London's social rented housing

The hypothesis that this review is seeking to test is that if the focus of housing strategy was to shift towards increasing the supply of bigger homes, it may have a more significant impact on solving housing problems at every level than the current target driven approach that produces more, smaller, homes.

- If the focus is on delivery of new homes, then the target would achieve better results for tackling overcrowding if it was more specific. The promised delivery of 50,000 more homes needs to specify exactly how many of each sized properties are to be delivered. A target of 42% of new social rented homes should be three bedrooms or more needs to be more specific – exact percentages for houses with 3, 4, and 5 or more bedrooms.
 - The current focus for social housing is on making best use of stock, mobility among social tenants to find the best fit for the properties that we have got.
- 1) What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?
- Increasing the supply of larger family homes would improve a local authorities ability to tackle overcrowding.
 - New communities created with the provision of new housing need a mix of households to become stable and this should include small and large households, old and young, working/ non-working. Building properties with varying numbers of bedrooms is necessary to achieve this mix of households in the community.
 - Nomination agreements to the increased supply of larger units should include a balance of transfers, households who have been accepted as homeless, and other households new to social housing.
 - We hope that capital funding will continue to contribute for the extensions and deconversions project that successfully saw the creation of 90 larger properties in the last 4 years in West London. Extensions and deconversions have been viewed as very successful, with families often remaining in the same area and therefore maintaining access to their current support networks, jobs, and friends and family, with an existing infrastructure to support households.
 - The effects of the June 2010 emergency budget will need to be mapped. Reductions in housing benefit received by households to align with their current housing requirement could result in an increased demand on smaller properties. The benefit changes that affect this demand are proposed to be implemented by April 2013, and the lead up to the changes could see a period of high mobility.
 - By volume of demand, the greatest need is for supply of 2-bed units by homeseekers.
- 2) What are the obstacles to increasing the supply of larger family homes?
- Space in which to build – several London boroughs do not have the land or space in which to build any homes. Most new builds of social housing are in outer London boroughs.
 - The cost of building larger homes exceeds that of building smaller homes

- Where landlords can build, there are distribution issues among boroughs that strive to reach a sub-regional agreement on allocations.
 - HCA funding regime favours number of units rather than number of bedspaces.
- 3) The Mayor has plans to tackle overcrowding in social rented housing by:
- Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and
 - Implementing the Mayor's action plan to reduce social housing¹. (note: X assumes that this means '... reduce overcrowding in social rented housing?')

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

- Delivery of only 3+ bedrooms in a single development area will not create the necessary mix of households that create a stable community.
 - The focus on the units to be delivered needs to be more specific – exactly what percentage of 3 bedroom, 4 bedroom, and 5+ bedroom properties will make up to 42% of total, to guard against delivery of all 3 bedroom properties.
 - Overcrowding Action Plan is a welcome and necessary drive to increase the mobility of under-occupiers and overcrowded families. Providing local authority teams with the practical methods shared in the action plan should allow the best use of existing stock to be made.
 - Clients groups that still need to be catered for: careleavers, single homeless, move-on from hostels, therefore a moratorium on 1-bed would only push the stress to other areas.
 - Underoccupiers will still require a supply from new build of 1 and 2 beds.
 - If the budget for delivery is not increased then effectively there will be fewer (but larger) homes delivered. This will put increased pressure on other housing forms, namely Temporary Accommodation and the PRS.
- 4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?
- Homelessness main requirement is 2 bed, and supply was limited to non-true voids then homeless households would see an increased wait for a unit of housing whilst in temporary accommodation
 - TA caps mean that very few larger properties in the Private Rented Sector (PRS) are affordable and this also increases the requirement on supply. There would be a financial incentive for boroughs to use new larger units for homeless allocation rather than transfer applicants.
 - Less 1-bed supply, similar impact on single homeless and move-on. While PRS is affordable on LHA in more areas of London, access is often difficult because of support needs of this client group
 - Where limited capital funding is available, the priority is to allocated funding where the need is most acute, and overcrowding in social housing, families waiting in costly TA, and the lack of affordable housing in the PRS all point to a need for large properties

¹ http://www.london.gov.uk/sites/default/files/Overcrowding_Action_Plan.pdf

Additional Questions:**Challenges to increasing supply**

- What are the issues surrounding house building economics on increasing the supply of larger family homes?
- What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Mayor's approach:

- To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?
- What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

Other measures for increasing supply:

- How can variable housing grant rates encourage the provision of more family housing?
- What other ways are there to increase the supply of larger family homes?
- What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

OSRH035

London Councils
59½ Southwark Street
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SE1 0AL

3rd September 2010

Assembly Member Andrew Boff
City Hall
The Queen's Walk
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London Councils officer response to the Planning and Housing Committee investigation into overcrowding in London

Dear Assembly Member Andrew Boff,

Many thanks for your invitation to take part in the review you are undertaking into overcrowding levels in London's social rented sector on behalf of the London's Assembly's Planning and Housing Committee.

As managers of much of London's social housing stock, the London boroughs recognise the many harmful impacts of overcrowding outlined in the Mayor's recent 'Overcrowding in Social Housing' Action Plan, particularly with regard to the health and educational outcomes of young people. Many of the case studies included in the plan demonstrate how boroughs are actively working with partners to develop innovative strategies to alleviate overcrowding in their social housing stock, and we welcome the Mayor's commitment to working closely with housing providers to tackle this issue.

1. What are your views on the proposition that 'increasing the supply of larger family homes would effectively tackle the housing problem of more Londoners in overcrowding'?

London Councils agrees that increasing the supply of larger family homes would significantly help to tackle the problem of overcrowding in London, but does not believe this alone would be entirely effective. The current high levels of overcrowding in the capital have occurred as a result of various initiatives affecting housing supply and management over many years and will only be effectively tackled by looking at the effects of current housing and welfare policies in the round.

It is crucial that future supply of new housing is able to meet projected housing need as modelled in the GLA's 2008 Strategic Housing Market Assessment (SHMA):

Percentage of total net requirements for new housing in London by tenure and size between 2007 and 2017¹

	Market	Intermediate	Social	All sectors
1 bedroom	37%	-15%	0%	21%
2 bedroom	19%	2%	35%	56%
3 bedroom	5%	5%	-7%	2%
4 bedroom	-6%	-1%	17%	9%
5+ bedroom	-3%	8%	6%	11%

Over all tenures, the fastest growth in demand will be for smaller one and two bedroom homes reflecting both overall expected population growth and a shift to more single-person households, particularly of older people. The SHMA report also indicates that there is expected to be growth in the numbers of children living in the capital. Families with children on average earn more than those without, but as the report highlights there are significant numbers of families on low incomes for whom home ownership is not a viable option. Based on these projections an increased supply of larger family homes in the social sector will be needed to meet demand, but this should be delivered alongside increased supply of smaller homes in both the social and private sectors.

Delivery of enough new homes to meet the backlog of housing demand in London will take time. Clearly in the shorter term, efforts to boost delivery must also be matched with effective management of the existing social housing stock. The Overcrowding Action Plan highlights many excellent schemes run by local authorities and housing associations to extend and de-convert existing properties and to support moves by under-occupying households looking to downsize into suitable smaller homes, thereby freeing properties for other families.

As you mention in your letter, overcrowding, though most concentrated in the social housing sector, is a feature across all housing tenures in the capital.

Percentage of households overcrowded in London by tenure²

Owner occupied	Social rented	Private rented	All tenures
3.0%	12.7%	9.8%	6.8%

The demand for housing assessed by the SHMA report was based on the assumption that the future proportion of households in the private rented sector eligible for Housing Benefit would be equivalent to 2007 levels. Since the May election the coalition government has announced plans to introduce wide-reaching reforms to the Housing Benefit system, including the introduction of a cap to the amount any household can claim. London Councils estimates this will leave around 18,500 households unable to afford their current rent, and is concerned that many

¹ (Minus indicates an estimated oversupply. Figures may not sum due to rounding)

Source: GLA (2009) 2008 London Strategic Housing Market Assessment, page 58, available at: <http://legacy.london.gov.uk/mayor/housing/prices/docs/SHMA-main-report.pdf>

² CLG, live table 807(as of Aug 2010), available at: <http://www.communities.gov.uk/documents/housing/xls/table807>

households will be unable to remain in their areas and will be forced to move to outer London boroughs or outside the capital, where rented housing is less expensive. This threatens to undermine local authorities' efforts to support mixed communities, reduce those families' access to work and educational opportunities and lead to an overheating of areas where not enough suitable private rented housing is available. Local authorities expect many households to become homeless and increase the numbers of families in temporary accommodation waiting for social rented housing.

2. What are the obstacles to increasing the supply of larger family homes?

Delivering substantial levels of new affordable homes, particularly larger homes, is especially challenging in an era of reduced public spending. In 2007 the last government set out its target to build 70,000 affordable homes a year across the country; an aim supported with £8 billion of subsidy. Public investment in housing through the National Affordable Housing Programme (NAHP) and other funding streams has already been reduced by the current government and is likely to be further cut in this autumn's comprehensive spending review. These reductions will impact on the supply of larger units.

Alongside these reductions in funding for affordable housing, the existing mechanisms for securing funding through private sector development most notably Section 106 planning agreements have not proved resilient in the downturn. There are no simple solutions to overcome these barriers.

Providing more, larger affordable homes is a priority for London's boroughs. Applications from 15 of the capital's local authorities for the HCA's Local Authority New Build (LANB) programme were approved, and many of the 837 homes that were built with the funding received were larger family homes. LB Greenwich, for example, built 47 homes with the funding they were awarded from the first round of the LANB programme, all of which had at least three bedrooms and 11 of which had five or more bedrooms. The LANB programme has now closed but many councils remain committed to building new council homes and review of the Housing Revenue Account (HRA) subsidy system offers these local authorities an potential avenue to continue this work.

The London Plan, the draft revised version of which is currently undergoing Examination in Public, includes a series of targets aimed at promoting the development of new housing. These include a pan-London target for net additional affordable homes and a guide for housing densities according to the location of developments. Some argue that the existence of these targets undermines delivery of larger homes as developers are encouraged to maximise simply the number of units completed above other considerations. However, there exist many examples of larger family sized housing built to high-densities, particularly by housing associations. Such schemes demonstrate that it is possible to deliver high numbers of units, to appropriate densities and ensure a supply of new larger homes. The determining factor in achieving all these aims simultaneously is the combination of a robust understanding of local needs with investment targeted at high quality schemes.

- 3. The Mayor has plans to tackle overcrowding in social rented homes by:**
- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
 - **Implementing the Mayor's action plan to reduce social housing [sic]**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of smaller homes?

London Councils does not believe a temporary moratorium on the building of smaller homes would be the most effective approach to tackling overcrowding in the capital. Even if such a moratorium was introduced and every affordable home delivered had a least three bedrooms it would take almost eight years to build enough homes for every overcrowded household which currently lives in social housing in London.³ If this was introduced now it would last beyond the period of the SHMA report (2007-2017), which outlined that demand for smaller two bedroom homes in this period will actually be higher than demand for larger homes. Increased supply, as we outlined in our answer to your first question is absolutely key, but it must be supply that meets need across the full range of household sizes and this must be combined with effective management of the capital's existing homes.

We expect the forthcoming final draft of the Housing Supplementary Planning Guidance (SPG) to include a target for the proportion of new social housing that should have three or more bedrooms. We believe the Mayor's strategic pan-London target will be helpful, but targets in themselves do not deliver homes. The most effective way of ensuring this higher proportion of larger homes comes forward will be through negotiation with local authorities. Boroughs will have the best knowledge about the neighbourhoods where overcrowding is concentrated and the particular size of new houses that are needed. Housing investment decisions must be effectively aligned with this knowledge to ensure that specific local needs are addressed.

The Mayor's 'Overcrowding Action Plan' is welcomed by London Councils and highlights many innovative schemes developed by local authorities and RSLs to tackle the problem, a result of CLG's 2007 overcrowding pathfinder programme. As we discussed earlier, increasing the supply of new homes will be crucial to solving the problem of overcrowding in the long-term, but it will take time, and for those households already living in overcrowded homes effective housing management strategies are needed.

All of London's local authorities were included in CLG's overcrowding pathfinder programme and given funding specifically targeted at overcrowding initiatives. This funding is due to end shortly and a potential lack of future funding threatens to impact on some the successful schemes designed by the capital's social landlords.

We believe that the Mayor's approach of encouraging the supply of more, larger homes at the same time as promoting borough best-practice around housing management is the most appropriate way to tackle overcrowding. Consideration of the issue should inform ongoing policy work at both borough and Mayoral levels and other initiatives, for example the Mayor's design guide, can also play a helpful role in combined efforts to alleviate overcrowding.

³ Based on 102,000 social renting households being overcrowded (as described in the Overcrowding Action Plan) and the draft revised London Plan target of 13,200 new affordable homes each year.

4. What would be the impact of prioritising the building of greater number of larger homes on other aspects of London's housing needs?

As outlined above, the SHMA highlights that there is also need for increased supply of smaller two bedroom homes in the social sector. With an ageing population more older people, living alone or in couples, are likely to be over-occupying homes across all tenures in the future. Efforts to encourage them to downsize are dependant on a supply of suitable smaller accommodation.

Aside from the need to tackle overcrowding, London of course faces many specific housing issues, including the need to tackle deprivation and worklessness, upgrade existing homes to the Decent Homes Standard and to meet higher environmental performance levels. Prioritising overcrowding as an issue across London should not undermine efforts to tackle all of these, however, boroughs are best placed to determine which specific issues affect each areas to the greatest degree and are therefore best place to determine how housing investment should be targeted to tackle these problems in their local areas.

Yours sincerely,

Response to London Assembly Planning and Housing Committee Review of Overcrowding in London

Borough Information

The most up-to-date information on the waiting list for social rented housing in terms of numbers and size of home required

- As of 1st April 2010, there were 4,987 households on Merton's Housing Register. Of these, 15% or 901 households required 3-beds or larger homes. 23% required 2-beds and 62% needed 1-bed homes.

Estimates of the scale and nature of overcrowding in social rented housing in your borough

- Most up-to-date figures at first quarter of 2010-11 show a total of 498 overcrowded households on Merton's Transfer Register. Of these, 66 were severely overcrowded
- According to Census 2001 showed that 8% of social rented households (873 households) in Merton are overcrowded compared to 2.3% of owner-occupied households and 6% in the private rented sector
- Merton's Housing Needs Survey 2005 showed 15% of social rented households being overcrowded compared to 2.2% in the owner-occupied sector and 9% in the private rented sector
- GLA estimates show that the level of overcrowding has increased approximately a third on the number 10 years ago

Details of the borough's housing allocation policies and priorities

- There is considerable pressure to house homeless households and to prevent homelessness in Merton. Our Allocations Strategy therefore gives priority to accepted homeless households and those under threat of homelessness, targeting 46% of lettings to these households.
- The Strategy sets a target of 18% of lettings to social tenants seeking a transfer. Last year (2009-10), 80% of lettings to households seeking a transfer went to an overcrowded household
- Other priority groups include Special Registers (13%), older people (10%). 6% of lettings are targeted to those with overriding medical priority, statutory overcrowding, reciprocals and exceptional circumstances

Borough's Response

What are your views on the proposition that "increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding"? What would be the effect on overall overcrowding of achieving the Mayor's target that 42% of new social rented and, by 2011, 16% of new intermediate homes provided for families needing 3 bedrooms or more?

Whilst we believe that increasing the supply of larger family homes is key to tackling overcrowding, relying on additional supply of new build homes and achieving the Mayor's larger homes targets would have negligible effect, particularly in a borough like Merton where there is limited build capacity with a small development programme. The London Housing Strategy needs to place more emphasis on making better use of existing stock through various initiatives.

Merton has a land capacity to build 320 new homes annually between 2011-2021, and a recent local study showed that it would be feasible to build 40% as affordable housing, i.e. 128 homes. However, the calculation did not taken into account the need for larger affordable homes and was based on a build programme of 1-bed or 2-bed affordable homes only. Factoring in the need to build larger affordable home and meeting the targets set by the Mayor will reduce the capacity for building affordable homes by 23%, equivalent to just under 100 affordable homes a year.

This means that only 30 larger affordable homes could be built annually in Merton, of which 23 would be social rented, which would benefit only about 3 additional overcrowded households needing social rented homes (18% lettings to overcrowded households seeking a transfer). At the same time, many households newly moving into social rented housing will become overcrowded as their families grow in size, so overcrowding will continue to grow.

Larger affordable homes also cost more to build and reduce the capacity of the overall affordable housing programme, and it is important to note that a proportion of these new homes will become under-occupied at some stage (30% - 35% in Merton). It is therefore our view that the Mayor needs to focus more on other measures, such as ways to effectively tackle under-occupation, rather than seek to increase the build programme of larger affordable homes.

What would be the effect on overcrowding, and other housing needs in London, of increasing the supply of more family homes, over and above the Mayor's target?

Given the small housing development programme in Merton, focusing on increasing the supply of more family homes will not help reduce overcrowding in the borough. There is also the issue of deliverability. We have been seeking the delivery of 30% of affordable housing as larger-sized homes for many years with little success, and only 5%(22) of affordable homes built In Merton in the last 2 years were 3-bed plus. It will therefore be a challenge for Merton to seek an increased proportion of larger affordable homes to meet the Mayor's targets, and in our view any targets set above the existing ones in the London Strategy would not be deliverable in Merton. Boroughs with large strategic sites (e.g. the Olympic site) may be able to achieve over and above the Mayor's target, but the Mayor should ensure that overcrowded households living in boroughs with limited build capacity will have access to these new homes.

What would be the impact of a temporary moratorium on building smaller social rented homes? What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

A moratorium on building smaller social rented homes, however temporary, would have significant impact on households in housing need and on the delivery of social housing. Merton has a comparatively small social rented sector at around 14% of total housing stock, therefore cannot rely on re-lets to meet the needs of smaller households. As outlined above, 85% of households on Merton's Housing Register require smaller social rented homes, and many are homeless or vulnerable households.

Stopping the building of smaller social rented homes would mean more of these households not being able to access affordable housing. This would also result in the silting up of supported housing and increase bed-blocking in hospitals, as smaller affordable homes are needed as move-on accommodation and for hospital discharges. Attractive and well-designed smaller social rented homes are also needed to encourage under-occupiers to downsize.

We are also unclear as to how the moratorium would work in practice. Developers will be able to continue building smaller social rented homes on sites that they have already obtained planning permission. In considering new planning applications, boroughs will have to adhere to their existing planning policies (e.g. Local Development Framework), therefore not in a position to reject proposals that contain small social rented homes without justification. Larger homes also attract a lower social housing grant rate per person than smaller homes, and developers/RSLs are likely to be able to demonstrate through financial assessments that it would not be financially viable to develop larger social rented homes only on any given site.

What are the obstacles to increasing the supply of larger family homes? What are the issues surrounding house building economics on increasing the supply of larger family homes? How can variable housing grant rates encourage the provision of more family housing?

The lack of build capacity for new housing in London is a major obstacle to increasing the supply of housing in London, including the supply of larger family homes. With regards to financial issues, increasing the number of larger affordable homes in a scheme often reduce the financial viability of the scheme, as grant rates per person for larger homes are lower than the rates for smaller ones. Variable grant rates based on number of persons housed rather than number of units built will help increase the financial viability of schemes with more larger affordable homes. In relation to shared ownership homes, private funders for schemes are often unwilling to build larger homes, as they are harder to sell because of affordability issues.

What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Housing budget reductions will result in a smaller affordable housing build programme, leading to the housing needs of an increasing number of households not being met. As Merton prioritises households in temporary accommodation as well as those at risk of homelessness when letting social rented homes, a reduction in new supply of affordable homes will result in more homeless households being placed in temporary accommodation and staying there longer. This will increase financial pressure on local authorities' budgets, increase the level of overcrowding, and will have wider social impact on households in housing need, affecting their health and educational attainment etc.

What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

The private rented sector plays an increasingly important role in meeting the needs of households requiring affordable housing. In Merton, we have been assisting an increasing number of households that are homeless or at risk of homelessness to access the private rented sector through our Rent Deposit Scheme (RDS). However, the funding for our RDS is under threat due to Government budget cuts, and the proposed changes to the Local Housing Allowance (LHA) would mean that for many large families in housing needs and on low income, it would no longer be an option to access the private rented sector.

To ensure that we make best use of the supply of family sized homes in the private rented sector, Homelessness grants to London boroughs would need to be protected, and any changes made to the LHA should take into account the need for larger households requiring affordable homes to access the private rented sector. Other incentives for private landlords with larger properties should also be introduced to help increase the supply of larger private rented homes for those in housing needs.

What other ways are there to increase the supply of larger family homes? How effective is the Mayor's London Action Plan to tackle overcrowding likely to be and what would be the impact of making more, larger family homes available through other options?

Available data show that there is sufficient housing stock of the right sizes to eliminate overcrowding in London, if we were able to effectively address under-occupation. The Mayor's Overcrowding Action Plan highlighted the fact that the level of under-occupation (average 25%) across all tenures in London is far higher than the level of overcrowding (average 6.8%). This is also the case in Merton, and Census 2001 data showed that in the social rented sector, 35% of households were under-occupiers compared to 8% who were overcrowded. Results of our 2005 Housing Needs Survey showed under-occupation at 30% and overcrowding at 15%.

This means that there are at least 3,500 households living in the social rented sector under-occupying their homes in Merton, many of which are older people households. In 2009-10, there were a total of 22 under-occupation moves in Merton. This shows that a lot more will need to be done to encourage more under-occupiers to move to smaller homes.

Increasing housing choice as well as providing advice and support are all key to encouraging under-occupiers to move. Increasing under-occupiers access to attractive and well-designed social rented homes is key to addressing under-occupation, it is therefore important that smaller-sized affordable homes should be maximised within the new build programme, rather than shifting the focus to building more larger homes. Given that a large proportion of under-occupiers are older people, it is important that more housing choice are made available to them through development of designated schemes such as extra care housing schemes, which will required Government investment.

Financial incentives, such as the Hackney Council scheme that helps tenants and those on the housing register to move into private rented homes outside London with 8 weeks of local market rent paid, will also encourage under-occupiers to move. Again, this will require Government funding as not all boroughs are in a position to fund such a scheme.

Funding could also be made available for Tenants Incentive Schemes to help under-occupiers with suitable financial means to purchase homes in the private sector. This is a cost-effective way to release larger affordable homes and will provide a quicker and cheaper solution than the building of new family-sized affordable homes. The Mayor could allow boroughs to run such schemes through his planned Devolved Delivery.

With regards to the effectiveness of the Mayor's Overcrowding Action Plan, although it does contain a number of initiatives to increase the supply of larger social rented homes, such as de-conversions; extensions & conversions; mobility schemes, none of these initiatives are new and they have had little effect in reducing overcrowding so far. Nor are these initiatives on a sufficiently large enough scale and many boroughs also lack the financial resources to implement good practice identified in the Action Plan. At the same time, many households newly moving into social rented housing will become overcrowded as their families grow in size. We therefore do not believe that the Mayor's target of halving overcrowding by 2016 is achievable unless other actions / initiatives are introduced.

In conclusion, we believe that in order to effectively tackle overcrowding in London, the Mayor needs to introduce initiatives that will make best use of the current housing stock, such as addressing under-occupation and increasing overcrowded households' access to larger private rented sector homes. The Mayor's targets for larger affordable homes will have little effect in reducing overcrowding. Larger homes are more costly to build, will reduce the capacity of the overall affordable housing programme, and a sizeable proportion them will

also become under-occupied. We therefore believe it is important for boroughs to maximise build capacity and prioritise the building of smaller homes. Not only do smaller homes meet the needs of the majority of households on the Housing Register, they are also needed to encourage under-occupiers to downsize. Initiatives that help households in need and under-occupiers to access homes in the private sector should also be introduced.

Dear Ms Hurcombe,

Re: Planning and Housing Committee: Overcrowding in London

Thank you for your letter dated 21st July 2010 I enclose the information that you have requested.

The following table shows the overall demand for housing in Brent by bedsize occupied and bedsize required. This gives details of levels of overcrowding and underoccupation in the Borough for all those who have applied for housing.

	Bedrooms Needed							
Current Bedrooms	1	2	3	4	5	6	7	8+
1	4654	1570	302	37	2	2	1	0
2	271	1579	973	202	43	1	0	0
3	121	268	823	325	74	12	0	0
4	28	54	100	159	52	14	6	0
5	6	4	17	40	42	27	10	1
6	0	0	3	10	4	4	4	0
7	0	0	0	0	1	1	0	0
8+	0	1	0	3	0	0	0	1

Total on housing register 15058

Total on bedrooms known 11852

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Percent total with bedrooms known 78%

Number 1 bed overcrowded 2951 (24.9%)

Pro rated for 100% known 3749

Number 2 beds overcrowded 602 (5.1%)

Pro rated for 100% known 764

Number 3+ beds overcrowded 105 (0.9%)

Pro rated for 100% known 133

The following table gives the figures for Brent tenants;

	Bedrooms Needed							
Current Bedrooms	1	2	3	4	5	6	7	8+
1	552	175	31	2	0	0	0	0
2	104	268	355	91	23	1	0	0
3	44	73	122	55	16	3	0	0
4	8	22	7	11	2	1	0	0
5	1	1	0	0	0	0	0	0

Total on housing register 1982

Total on bedrooms known 1968

Percent total with bedrooms known 99%

Number 1 bed overcrowded 587 (29.8%)

Pro rated for 100% known 591



Brent – building a better borough

Number 2 beds overcrowded 139 (7.1%)

Pro rated for 100% known 139

Number 3+ beds overcrowded 29 (1.5%)

Pro rated for 100% known 29

I have attached a copy of Brent's Allocation Policy as requested.

In terms of the additional questions that you have asked I have the following comments.

1 "Increasing the supply of larger family homes would effectively tackle the problems of more Londoners in overcrowding?"

Clearly an increase in the supply of larger homes would be assistance in dealing with overcrowding. However, it could not be seen as the whole solution to the problem. Our own work as a pathfinder authority has shown that just rehousing cannot be seen as the full solution. Other issues such as assisting emerging households, dealing with underoccupation, building loft conversions and extensions and providing mitigation can also be part of the solution. It also has to be borne in mind that it is not just overcrowded families who need larger homes for example Brent has over 750 accepted homeless households who need four bedroom plus accommodation to be housed. Our statutory duty remains to those families and therefore we have to balance their needs against other overcrowded families.

2 "What are the obstacles to increasing the supply of larger homes"

The cost of building new larger homes is often seen as excessive by developing Housing Providers when compared with their ability to build more smaller units. The full benefit of building a larger home is not always realised in that the home may help several families to move to larger accommodation as each household upgrades to larger accommodation. In London some development sites are more suited to smaller homes, which makes the provision of larger homes more difficult. Often organisations are judged by the number of homes that they build rather than the size of the property which may encourage the building of smaller homes.

3. The Mayor has plans to tackle overcrowding in social rented housing by:

- introducing a target that 42 % of new social rented homes should be three bedrooms or more and

- implementing the mayor's action plan to reduce social housing

How effective are these measures likely to be compared to other potential policy initiatives such as introducing a temporary moratorium on the building of small homes

The percentage target would seem to be a more sophisticated way of encouraging the building of larger homes. It would make it clear the level of larger homes expected, while not discouraging

 INVESTORS IN PEOPLE	 POSITIVE ABOUT DISABLED PEOPLE	 BSI REGISTERED Number: FS35137	Brent – building a better borough
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the building of smaller homes. The correct type of high standard smaller homes can still be useful in dealing with overcrowding for example by helping to move underoccupiers. The target would have to allow for individual needs that may be required in each Borough for example a particular regeneration scheme may affect the size of property required or the development of homes for older residents may increase the need for smaller homes.

4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing need?

As stated previously the building of more larger homes and establishing mechanisms where this is more feasible would be a great assistance to those who are overcrowded and is to be encouraged. Housing Needs and meeting demand is however a complex issue and a balance has to be maintained. For example if there are not homes for new emerging households will this encourage more young people to stay at home and therefore increase overcrowding levels?

Tackling overcrowding must be a high priority for London as we can all see the stresses that overcrowding places on families in London. I would support an intelligent programme to do more for overcrowding in London while still allowing other local needs to be addressed.

Yours sincerely

MAJOR CHANGES TO THE ALLOCATION SCHEME SINCE VERSION 09

The scheme has been reviewed and updated. The main changes are :

- ⇒ The band reasons and banding scheme has been updated.
- ⇒ The position of those who live outside of Brent has been explained in more detail
- ⇒ The position of owner occupiers has been explained in more detail.
- ⇒ The assessment of cumulative housing need has been expanded and defined in more detail



1. PURPOSE

- 1.1 This Scheme document explains Council policy, practice and procedures for allocating vacant Council accommodation and for nominating housing applicants to other landlords (mainly local Housing Associations).
- 1.2 To ensure that all housing allocations are carried out in compliance with approved Council policy and practice, and in accordance with the relevant legislation.

2. SCOPE

- 2.1 The Scheme is to be used by appropriate HRC and Brent Housing Partnership staff. It provides information about the Allocations system for all Housing Services staff, particularly those who have to deal with customers. This Scheme document is a key component of HRC's quality assurance system and is part of the body of documentation required for ISO 9002 / ISO 9001: 2000 registration.

3. DEFINITIONS

- 3.1 Allocations Process means the matching of available dwellings with suitable applicants, making offers to those applicants and seeing these through to a definite acceptance or refusal.
- 3.2 Allocations System means all the arrangements needed to enable the process to take place. It therefore covers policy and practice and the detailed procedures for assessing applicants' housing needs and determining their relative priority.
- 3.3 Lettings Process is that of formally establishing a secure tenancy when applicants have accepted an offer.
- 3.4 A Reasonable Offer is one which matches an applicant's requirements according to certain criteria (Appendices 2 and 3).
- 3.5 Allocations Panel an officers panel which agrees exceptions to the normal Allocations policies.
- 3.6 Chair of Panel is the Rehousing Manager
- 3.7 SAO Senior Allocations Officer
- 3.8 HRC Housing Resource Centre
- 3.9 WI Work Instruction



3.10	CW	Caseworker (Homeless Persons Officer, Rehousing Officer or Transfer and Registration Officer).
3.11	CWM	Casework Manager (any Manager of Caseworkers)
3.12	HA	Housing Association
3.13	Homeseekers	Applicants to the Council for housing who are not Council tenants
3.14	Locata	Central Lettings Agency which processes the choice based lettings scheme
3.15	HRCPR006	Internal Quality Audits Procedure
3.16	HRCPR036	Rehousing Procedure
3.17	HRCPR052	Homeless Assessment Procedure

4. RESPONSIBILITIES

4.1	Senior Allocations Officer	responsible for allocating properties and deciding on the reasonability of offers.
4.2	Caseworker	responsible for liaising with the customer.
4.3	Casework Manager	responsible for making decisions.
4.4	Rehousing Manager	has overall responsibility for the allocations process
4.5	Housing Association / Other landlords	responsible for processing nominations and advising the Allocations section of the result.
4.6	Brent Housing Partnership	responsible for processing offers of council accommodation and advising the Allocations section of the result.

5. REFERENCES

5.1 POLICIES

5.1.1 The current Allocations Scheme was agreed by Members of the Housing Committee on March 20th 1995 and revised to reflect the 1996 Housing Act on December 16th 1996, and further revised on 22 January 1998 to reflect Housing Act changes introduced on 1 November 1997. Members agreed the introduction of the Locata scheme on 13 February



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2002 and on 18 November 2002. The Executive agreed this present scheme on 12th November 2007. Members also agree Demand Groups and Targets on an annual basis, normally in February or March.

5.2 RELEVANT LAW

5.2.1 The 1996 Housing Act as amended by the Homelessness Act 2002 and the Housing Act 2004 sets out the legal framework for operating an allocations scheme. "Reasonable preference" must be given to the following types of applicant :

- those who are homeless (within the meaning of Part VII)
- those who are owed a duty by any local housing authority under Housing Act 96 s190(2), s193(2), or s195(2) (or under HA1985 s65(2) or s68(2)) or who are occupying accommodation secured under s192(3)
- those in insanitary or overcrowded housing or otherwise in unsatisfactory housing conditions
- those who need to move on medical or welfare grounds (including grounds relating to disability)
- those who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or others).

The Allocations Scheme can also,

Give additional preference to sub-groups within the reasonable preference categories, provided they can be identified as having urgent housing need.

5.2.2 All allocations other than those specifically excluded under the Act must be made in accordance with the scheme.

5.2.3 A summary of the allocations scheme must be available free of charge to any member of the public who asks for it. A full copy of the scheme must be made available on payment of a reasonable fee (£168).

The Homelessness Act 2002 has been implemented. Amendments to Part VII and Part VI came into effect in July 2002 and January 2003 respectively. Part of this is the introduction of more Choice to applicants. Further amendments to Part VI change the categories of persons entitled to be given reasonable preference. The scheme must also include a statement on the Councils policy as regards choice Brent's response to this has been the development of the Locata scheme. The code of Guidance states that the Secretary of State believes that the providing choice is the best way to ensure sustainable tenancies and to build settled and sustainable communities.

5.3 COUNCIL POLICY

5.3.1 Allocations policy aims to achieve the following:



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- (a) justifiable and consistent decisions aimed at assisting households most urgently in need of accommodation or alternative accommodation;
- (b) fair access to our services regardless of race, gender, disability, age, religion, nationality, social background or sexuality,
- (c) the lowest possible number of households in temporary accommodation, particularly bed and breakfast;
- (d) maximum use of the Council's housing stock in terms of both empty and under-occupied dwellings;
- (e) compliance with statutory responsibilities under the Housing Act 1996 & Homelessness Act 2002;
- (f) a degree of choice of area for applicants; and
- (g) clear and published information about Council policy and practice, and explanations of decisions.

In drawing up this scheme there has been consultation with all registered social landlords with whom the Council has nomination arrangements (Housing Associations), Council Tenants, Housing Register applicants and various departments of the Council, including Social Services. Also, due consideration was given to the Council's powers and duties contained in the Housing Act 1996, Homelessness Act 2002, related legislation and guidance given by the Secretary of State and in respect of equal opportunities under various pieces of legislation.

The Council has changed the way it lets permanent housing to give people more choice. Brent together with five other London boroughs and ten Housing Associations, have joined forces to promote a new way of helping people to move or find a new home.

A Central Lettings Agency, Locata, has been set up to work with all partners to advertise and match people to homes. Movement between boroughs is possible because 1 in 10 vacancies will be available to tenants and homeseekers (including homeless households) living in any of the six local authority areas. Under the scheme tenants and homeseekers become members of Locata and actively search for a home. Vacant properties are advertised in a regular free sheet (called Locata Home) and on the Internet and members of Locata are able to bid for properties. All members are placed, in date order, into a broad needs band according to their circumstances.

The Council's lettings policy is based upon a target system with targets set for transfers and homeseekers. Targets are set and agreed annually by the Executive with each group given a target proportion of lettings. An annual review of both projected supply and demand takes place and a strategy is planned for all lettings for the coming year. There is



regular monitoring of Council lettings, Housing Association nominations and there is a half yearly review by the Executive.

Targets are set taking into account housing need, statutory and contractual obligations, the cost of temporary accommodation and other financial considerations, the Council's responsibility as a landlord and the need to make the best use of Council stock, and the housing situation within the borough.

5.4 DEMAND GROUPS AND TARGETS

5.4.1 The allocations system is based on the provision of accommodation for specific demand groups of applicants. For each of these groups there is a Committee approved annual rehousing target. The demand groups are made up of applicants, both transfer and housing register, who are either in need of urgent rehousing for various reasons or who qualify for a particular rehousing scheme. There are specific qualification criteria for each demand group. Appendix 1 shows the demand groups with their qualification criteria.

5.5 RENT ARREARS AND TRANSFERS

5.5.1 Tenants can apply for a transfer regardless of the length of their tenancy or the state of their rent account. Their applications are then processed normally. If they qualify for a Transfer their rent account may be taken into account when an offer is made. Tenants with rent arrears of six weeks or more will be suspended from receiving the offer of accommodation. Consideration will be given to varying this rule in some circumstances including;

- Tenants with urgent management or medical priority in band B or A may be transferred at the discretion of the Rehousing Manager.
- Offers of accommodation may be made despite rent arrears to Tenants who need to move because of statutory overcrowding or because of an overriding priority awarded by the Allocations Panel or where a permanent decant is essential will be transferred despite rent arrears
- Tenants moving under the Incentive Scheme subject to the above guidelines may be made an offer with the incentive payment being set off against the arrears.

5.6 PRIORITISING WITHIN DEMAND GROUPS

5.6.1 Priority within each demand group is determined by the date of qualification for that demand group. Exceptions to this rule are considered and this is dealt with below at 5.10.

5.7 OFFER POLICY



5.7.1 For those that are bidding through the Locata scheme there will not generally be a penalty for refusing an offer. However, this may be reviewed where a member is making a large number of unsuccessful bids or where there is a particular need for the member to be moved. Also, the relative priority may be reviewed where the member does not make a successful bid within a reasonable time or where they are refusing offers. Particularly where a high band is awarded applicants are expected to bid regularly and realistically as this should lead to housing. It is not expected that applicants will refrain from submitting bids or refuse offers in the hope of obtaining the ideal property. Therefore, where an applicant in a high band is not bidding or is refusing offers then the Council may fulfil its obligation to the applicant by: making a direct offer: enforcing an offer of a property for which the applicant has successfully bid, or by reviewing and reducing the priority of the applicant.

For ex service tenants specific rules apply in relation to the number of offers made and these are contained in WI 4.

To comply with a statutory duty such as a homelessness duty, Compulsory Purchase Order and other statutory duties the Council reserves the right to make offers outside of the choice based system. Such offers will be reasonable and in line with the Councils criteria.

5.7.2 For offer policy purposes, “reasonable” is defined in terms of the size, floor level, special needs features, condition and location of the dwellings being offered. Size suitability criteria are set out in Appendix 3. The other aspects of reasonableness are dealt with in Appendix 4.

5.7.3 It is policy to allow offers to be made, which do not fully match the reasonableness criteria, where there are good grounds for thinking they may be accepted.

5.7.4 Applicants will not be made an offer of accommodation if, at the time they bid for a property, any of the following circumstances exist:

- Financial resources available to the applicant to meet their own housing costs
- Applicants, own their own home, except in exceptional circumstances
- Homeseekers are found to have sufficient financial resources to obtain accommodation for themselves in the private sector
- Tenants with a current application to buy their dwelling or for a home purchase grant e.g. Homebuy, at the time a bid is made for a property
- There is reasonable evidence that the applicant or their family has given false or misleading information to the Council.

Owner Occupiers will be made aware of this policy when they register.

5.8 RESTRICTIONS ON CERTAIN DWELLINGS



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5.8.1 It is part of allocations policy that certain dwellings are only offered to particular kinds of applicant. There is also a range of dwelling types and specific blocks where some kind of age requirement applies e.g. Sheltered Housing and blocks designated for the over fifties. Appendix 4 provides a full list of the dwellings concerned.

5.9 DECISION MAKING

5.9.1 The Director of Housing and Community Care has authority, delegated by the Council, to determine housing applications in accordance with approved policy and practice and the appropriate legislation. The way in which this operates is detailed in the procedures. It is practice, however, for the decisions made by officers on particularly sensitive applications, e.g. where there is a relationship between an applicant and a Councillor or Officer, to be reported to the appropriate Lead Member (See WI.7).

5.10 EXCEPTIONS TO POLICY

5.10.1 It is an important part of allocations policy that there is a mechanism for making exceptions to normal practice where this can be justified by the particular circumstances of an individual applicant. A formally constituted panel of officers exists to consider and determine such cases and WI.1 provides guidance on the kind of circumstances which could be appropriate and gives details of the relevant procedure for referring cases to the panel. Exceptions to normal procedure are made in particularly sensitive circumstances (See WI.7 on conflicts of interest).

5.11 SECURITY AND SAFETY

5.11.1 The safety of applicants and staff is an important part of the Allocations Scheme. If an applicant is shown to be a danger to themselves or to others then appropriate safeguards will be put into place. This may include preventing the applicant from bidding for accommodation, making a direct offer and/or identifying the risk factor on the application and sharing this information with viewing officers and other landlords. Applicants within this category would include those who are referred through the MAPPA process including schedule 1 offenders. When such cases are referred to the Council a judgement will be made to establish if the client is suitable for general needs social housing. Otherwise, such clients may fall within the category of those who are ineligible for housing. Offers made to MAPPA cases will be verified as suitable with the appropriate authorities (normally the police) before being made.

5.11.2 The Council will also consider for rehousing applicants referred to it through the Multi-Agency Witness Mobility Scheme. Such cases will have been assessed and verified by the Scheme managers. There are particular confidentiality considerations for such cases and no personal information will be taken until the applicant accepts an offer of accommodation in the Borough. Any proposed offer will be checked for suitability by the Witness Mobility Scheme before the offer is made. Brent believes that there are benefits in participating in this scheme in terms of crime reduction and supporting witnesses in the legal process.



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5.12 MONITORING THE PROCESS

5.12.1 It is policy for the allocations process to be monitored at both Committee and officer level. Work Instruction 2 gives details of both processes.

6. RECORDS

All applicant files created following the Allocations process, are forwarded to the Housing Office when the applicant has been rehoused.

For applicants rehoused in Housing Association properties the files are kept by the Finance and Systems Section.



7. WORK INSTRUCTIONS AND APPENDICES

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THE ALLOCATIONS PANEL

The Allocations Panel will consider requests for exceptions to be made to normal policy and practice. All requests must be made in writing, either from the appropriate section of HRC or from the appropriate Brent Housing Partnership office. Exception requests must include full details of individual applicant's circumstances and should highlight those aspects which differentiate the individual from other applicants in the same demand group. The Allocations Panel will record its decisions and the reasons for reaching them.

TERMS OF REFERENCE

- To consider and determine applications where it is considered that making an exception to normal policy and practice should be considered.
- To consider and determine Management Transfer applications and Council tenants who are statutorily overcrowded.
- To consider and determine rehousing requests for individual cases which are not covered by the allocations demand groups.
- To consider urgent decant request.
- To determine if an applicant should be in Band A.
- To consider cumulative need which might lead to an award of Band A

MEMBERSHIP

Rehousing Manager
Senior Rehousing Officer
Other appropriate Officer

METHODOLOGY

Cases will be referred to the panel, by officers (Caseworkers, Customer Services Officers etc.) on behalf of applicants, using approved procedures (See WI 1). All panel decisions will be formally recorded with reasons.

1. TAKING CASES OUT OF ORDER

It should be borne in mind that several demand groups are by definition largely made up of urgent cases. Accordingly, it will be only the most exceptional circumstances which will justify making an offer out of date order will be extreme and rare i.e. virtually life



threatening for medical or management transfer cases. As a result making offers out of date order will be a rare occurrence and will be for exceptional cases. For less urgent groups there could be a range of possible reasons for bringing an application forward in the queue. Some of these could relate to an applicant's circumstances. Others could be based on spin-off benefits for other applicants e.g. where the dwelling released by a transfer is in particularly high demand or is being seriously under-occupied.

2. ARREARS AND LENGTH OF TENANCY

In addition to the general policy relating to transfer applicants with arrears of rent there could also be circumstances where a waiver of the normal rules on arrears could be justified. It is part of the standard allocations procedure that the individual circumstances of applicants are checked when they reach a point where non-compliance with the rules will prevent them from receiving an offer. However, there is Committee support for the idea that the general prohibition on offers, in rent arrears cases should not preclude permitting of offers of transfers where these would be in the Council's overall interest. Examples of this include where a transfer to a lower rented dwelling could help reduce arrears, situations where there is serious under-occupation of accommodation, or where the dwelling released by the transfer is needed for an applicant with a high level of housing need.

3. UNDER-OCCUPATION INCENTIVE SCHEME

This scheme provides for under-occupying tenants to move to smaller dwellings, mostly applicants are giving up two bedrooms or moving to a one bedroom or studio flat. However, there may be occasions, where the dwelling released is so large and/or so valuable for reletting purposes, that an exceptional offer of two or three bedroom accommodation could be justified (See WI. 5).

4. ELIGIBILITY FOR THE HOUSING REGISTER

Although a person may appear to be ineligible for the Housing Register (other than for reasons relating to ineligibility because of immigration status) (see Appendix 6) there may be circumstances where an exception needs to be made e.g. where undue hardship would be caused to the applicant or member of their household or other exceptional or extenuating circumstances. Officers who come across such a case should prepare a report for the Allocations Panel.

5. TWO INTO ONE TRANSFERS

Periodically we are asked to move two tenants into one property. Such requests must be considered by the Allocations Panel. The report should include :

- Address of both parties
- Size and detail of accommodation
- Existing priority
- Any other relevant Management issues
- Details of other landlord



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- Area Office recommendation.

Applicants must maintain their existing tenancies until a decision is made by the Allocations Panel.

6. SOCIAL WELFARE FACTORS –THE WELFARE PANEL

It will be appropriate sometimes to consider whether particular individual social factors, are not adequately catered for in the normal assessment process alone, should influence the priority given to an application. This needs to be borne in mind for all demand groups except Management Transfers where exceptional social circumstances are one of the qualification criteria. Work Instruction 3 which deals with Management Transfers provides some guidance on the kind of social factors which could be relevant.

The Welfare Panel set up to consider such social or welfare factors and is able to award Band C or B in terms of priority.

Band C Reasonable Preference

Band C will be awarded where housing is required to address some social or welfare hardship affecting the applicant. Examples include situations where accommodation is required to assist Social Services to deliver a Care Plan or to enable an applicant to move in order to be able to access support or services or to accommodate a carer, as agreed with Social Services.

Although it is acknowledged that some households might experience hardship if not located within a particular area either to receive or to provide support, it is also recognised that Brent has excellent transport links across the Borough and that it will be unusual that a move would be the only way that such support could be accessed.

Band C will be awarded to assist disabled people access services by the provision of improved housing. However this will only apply where the current housing is inadequate and where priority has not already been awarded for this reason on other grounds.

Band B Severe Social Hardship

Band B will be awarded in circumstances where an applicant has an urgent need to move due to severe social hardship. Such severe hardship includes an urgent need to provide or receive support, including from Social Services: child protection reasons or other urgent welfare issues which if unmet could result in severe hardship.

If the Welfare Panel considers that a particular case might warrant the award off Band A then responsibility for this decision will be passed to the Allocations Panel.

Guidance to the Welfare Panel – Composite Assessment of Need



In making its decisions the Welfare Panel (and Allocations Panel, if appropriate) will have regard to the following guidelines;

- 1 When considering an application which falls into a Band for more than one reason, or where an application has characteristics which brings it more than once into bands B to C, consideration should be given as to whether the higher band more appropriately reflects the circumstances of the household, and if it does whether or not to place the application into a higher band
- 2 The Welfare Panel will consider multiple or cumulative needs of a household, both in terms of the combination and degree of each of the different factors and evaluate the impact of the applicant's housing conditions overall on the applicant or any member of the family, to determine if a higher band should be awarded.
- 3 It is recognised that each band covers a range of housing need and simply having, for example, two reasons for being in band C, an applicant would not simply be moved up to band B. However, the Panel will look at each reason for being in band C, and consider the degree or severity of each need, before reaching a decision on the appropriate overall priority to be awarded.
- 4 Although an applicant's household may present with multiple needs, these needs will often be of a minor nature so that even looked at cumulatively, they will not justify placing the applicant into a higher Band. For example an applicant awarded reasonable preference, Band C, because they are homeless, who also has some minor medical or welfare need, will not necessarily be placed in band B.
- 5 It is necessary rather to consider and evaluate the severity or degree of the different types of need and to assess the extent to which these individual issues impact negatively upon the health or welfare of one or more members of the applicant's household. By carrying out a composite assessment of need it is envisaged that the highest priority is given to those in greatest need.



WORK INSTRUCTION 2 - ALLOCATIONS MONITORING

CURRENT ALLOCATIONS MONITORING ARRANGEMENTS ARE SET OUT BELOW.

1. All allocations procedures are monitored through the internal quality audits required for ISO 9002 / ISO 9001:2000. Details of this process are contained in Internal Quality Auditing procedure HRCPR006.
2. On a monthly basis target break down comparisons are produced by the Systems Manager. These reports allow the Allocations section to monitor their performance against the annual targets set by the Executive
3. An annual report is sent to the Executive for approval (the Supply and Demand Report) which outlines the position for supply and demand within the Borough. It also gives details of any particular needs that might arise over the coming year so that adjustments can be made to the allocations targets and processes.



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WORK INSTRUCTION 3 - MANAGEMENT TRANSFERS

POLICY

1. In the past, rehousing policy for Management Transfer applicants has differed from that for other types of transfer applicant. However, from March 1995 when the Housing Committee approved the review of Allocations policy and practice, rehousing policy for this demand group has been the same as for all the other transfer groups, i.e. one reasonable offer, although more offers could be made through the Locata scheme.

IDENTIFICATION OF POTENTIAL CASES

2. Appendix 1 defines the qualification criteria for the Management Transfer demand group. There are two basic types of case. One is where there is violence or threat of violence including racially motivated acts. The second is where there are exceptional social, educational or economic circumstances, which are having a major, adverse effect on a household but which are unable to be resolved other than by rehousing. In either case it is important that all possible solutions to the applicant's problems are explored before rehousing is considered. A transfer should be regarded as a solution of last resort and it should be clear that moving will significantly improve the applicant's situation. There should be a degree of urgency involved and 'exceptional' means circumstances which are rare and are unlikely to apply to more than a small number of transfer applicants. Some examples are set out below.

Households who have experienced a particularly traumatic experience at their current home.

A Neighbour dispute where all avenues to resolve the dispute have been exhausted and a transfer is the only solution.

3. In violence/fear of violence cases it is important to distinguish between isolated or one-off events, which would not normally justify a management transfer, and incidents which form part of a sustained campaign of action. However, it could be that a single incident is so severe and exceptional that a transfer would be appropriate. Very extreme cases, where tenants or members of their household feel unable to stay in their home, are dealt with according to assessment arrangements for homeless households.

PROCEDURES

4. Management Transfers are initiated by Brent Housing Partnership according to the approved procedures and a standard report format is used. When this has been completed and approved by the Housing Manager it is submitted to HRC's Rehousing Team for submission to the Allocations Panel.



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5. The Rehousing Team make a preliminary assessment of applications to decide whether a medical assessment is needed and whether it would be appropriate to request a report on the mental health aspects of the case.
6. When all the relevant information is to hand the Allocations Panel considers the application and wherever possible reaches a clear decision. Further information or clarification is sought, however, if the panel feels this is necessary. The decision and reasons are recorded on the form and on the panel's record system.
7. The Rehousing Team arranges for the panel's decision to be reported to the appropriate Housing Manger who is responsible for informing the applicant.
8. The decision on a Management transfer will cover which band the applicant is to be awarded. The criteria for bands A and B are explained in appendix 1.



WORK INSTRUCTION 4 - FORMER SERVICE TENANTS

CREATION OF SERVICE TENANCIES

1. The Housing Management Sub-Committee on August 7th 1985 recommended that no new service tenancies should be created without the prior approval of the Sub-Committee. This was later ratified by the Housing Committee. Any requests, therefore, for the creation of a new service tenancy should be referred to the Head of HRC before approval is sought from the Committee. On 13 March 2002 Corporate Deciding Committee decided that no new service tenancies should be created without express permission of the Chief Executive and the Borough Solicitor.

REHOUSING FOR SERVICE TENANTS

2. The Housing Committee reviewed rehousing policy for residential employees in July 1990. The policy agreed is set out below. The Deciding Committee in March 2002 determined that this policy would not apply to non Education residential staff.

3. Residential Employees with at least five years service and employed prior to August 1st 1990 who retire due to old age or medical reasons, or who are made redundant as part of a Council decision, are entitled to a dwelling which matches their household size or a two bedroom dwelling whichever is the larger. They are also entitled to up to three offers in their area of choice. If, after a three month period from either the retirement date or the application approval date whichever is the later, it has not been possible to make an offer in the area of choice, then up to three offers will be made in the nearest area where properties are available within the next three month period. If the applicant refuses these properties the Council will be deemed to have met its obligations and eviction can be implemented if the applicant does not move voluntarily.

4. The Housing Committee also approved arrangements for an Appeals Panel to consider cases where an employee considered that the actions of Housing Services were in any way not in accordance with this policy. The membership of the panel (which would be an ad hoc Sub-Committee of the Housing Committee) would comprise three members of the Housing Committee, one member of Human Resources and one Union representative as an observer.

5. Residential employees employed prior to August 1st 1990 with at least five years service who leave of their own free will are entitled to up to three offers of property of a size which matches the needs of their household.

6. Residential employees employed from August 1st 1990 with at least five years service, are entitled to rehousing in accordance with the rehousing policy operating at the time of their termination of employment with the Council.

7. The rules set out above apply to all residential employees except school caretakers for whom the policy has changed in May 1991 and amended further in April 1995. The current policy for this group is set out below.



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8. School caretakers employed prior to August 1st 1990 who meet the requirement of paragraphs 3 or 5 above, are entitled to up to three offers in their area of choice on a 'like for like' basis i.e. a dwelling which is comparable to their former accommodation in terms of number of bedrooms, size and nature. Officers are authorised to enquire whether a dwelling falling short of these criteria might be acceptable in order to avoid delaying rehousing.

9. For school caretakers employed from August 1st 1990 Council policy is exactly the same as for all other residential employees of the Council.

OPTED - OUT SCHOOLS

10. In April 1995 the Ad-Hoc Allocations Sub-Committee reviewed the policy for school caretakers in the context of opted out schools which had previously been run by the Council. The policy agreed, and subsequently ratified by the Housing Committee, is that caretakers of grant maintained (opted-out) schools, including North West London College, have the same rehousing rights as caretakers of schools still under Council control. This includes caretakers appointed after the school opted out but only in cases of retirement.



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WORK INSTRUCTION 5 - UNDER-OCCUPATION INCENTIVE SCHEME

POLICY

1. This scheme, approved by the Housing Committee in June 1985, is for Council tenants who are under-occupying their existing dwelling and are willing to move to a bedsitter or one bedroom dwelling and those who are moving to a property with two bedrooms less than they currently occupy. They are entitled to an incentive payment of £4000 plus free removal. Through the Locata scheme offers may be possible in other Boroughs. The amount of payment is currently set at £4000, but this may vary in the future at Officers discretion. Free removal is also provided to tenants transferred within Brent to permanent social housing.

2. Rent arrears will not prevent a move but the grant payment, or part of it, will be credited to the applicant's rent account to clear any arrears, or reduce them if they exceed £4000.

3. Although the scheme is basically aimed at achieving moves to bedsitters and one bedroom dwellings and those underoccupying by two bedrooms, the Housing Committee in July 1995 agreed to give officers discretion to offer larger accommodation if a bedsitter or one bedroom or two bedrooms short would not be accepted. The arrangement agreed was that 3 bedroom accommodation could be offered to tenants in 4 bedroom dwellings, and 2 bedroom accommodation could be offered to tenants in 3 bedroom dwellings. This discretion needs to be used sparingly. The scheme should always be promoted on the basis of bedsitter/one bedroom and two bedrooms less offers but the option to offer something bigger is available if it is the only way to achieve a move from an under-occupied dwelling which is badly needed to meet priority demand.

4. In October 1996 the Under-Occupation Incentive Scheme was extend by the Housing Committee. Payments can now be made to three other types of tenant who are under-occupying.

(1) Tenants moving out of Brent through the scheme to another Borough will receive £4,000.00.

(2) Tenants moving into Private Sector Housing through the scheme will receive £4,000.00.

(3) Housing Association tenants moving into smaller bedsit or one bedroom property or giving up two bedrooms can receive £4,000.00 where the Council obtains nomination rights for the resultant vacancy.

PURPOSE OF WORK INSTRUCTION

The purpose of this work instruction is to ensure that tenants moving through the Under-Occupation Incentive Scheme receive their incentive payment six weeks after tenancy termination.

RESPONSIBILITIES



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- | | | |
|----|------------------------------------|---|
| 1. | Transfer and Registration Officers | Are responsible for ensuring that all Under Occupation Incentive scheme cases are registered on the Rehousing list "IN" |
| 2. | Systems Manager | Is responsible for producing a list of those rehoused through the Under occupation Incentive Scheme |
| 3. | Rehousing Manager | Is responsible for sanctioning the payment of the Under-Occupation Incentive Scheme. |
| 4. | Finance Manager | Is responsible for processing the Incentive Scheme payment and issuing the cheque. |

DEFINITIONS

- | | | |
|----|---|---|
| 1. | Under-Occupation Incentive Scheme payment | A payment of £4000 to be given to those tenants meeting the criteria of the scheme. |
|----|---|---|

DETAILS OF WORK INSTRUCTION

1. All tenants that qualify for the Under-Occupation Incentive Scheme must be registered on the Rehousing list "IN" by the Transfer and Registration Officers.
2. At the time of the offer the Senior Allocations Officer ensures that the Incentive scheme priority is clear to the viewing officer and that the tenant is entitled to free removal and incentive scheme payment. The Housing Office are responsible for the free removal while HRC deal with the Incentive Scheme payment.
3. Each month the Systems Manager will produce a list from First Housing of all those tenants who have signed tenancy agreements for properties and who were rehoused through the Under-Occupation Incentive Scheme. The list will cover Council and Housing Association properties. This is then given to the Rehousing Manager.
4. The Rehousing Manager will issue a memorandum to the Finance Manager for any tenants who have accepted properties that month within the Incentive Scheme category. The memorandum will indicate if the tenant is in arrears and if part of the payment should be offset against their rent account.
5. The Finance Manager will then process the payment and a cheque will be raised and sent to the tenant.
6. For those tenants moving independently into the private sector or out of Borough the Housing Office will advise the Rehousing Manager if they feel that a payment may be required and this will then be considered and processed if the tenant qualifies.



WORK INSTRUCTION 6 - CONFLICTS OF INTEREST

1. Where staff have any personal involvement in a case with which they are dealing, or expecting to deal with, they must inform their manager as soon as possible. The relevant manager will then either take personal responsibility for the case or delegate to another appropriate member of staff.
2. Approval decisions on applicants who are Councillors, immediate relatives of Councillors, Senior Officers in the Council or Housing Services employees (including private contractors) must be reported to the Rehousing or Assessment Manager. He/she will notify the Head of HRC who will decide whether it is appropriate to report the decision to the Lead Member or Councillors.
3. The Rehousing Manager will monitor the progress of all the approved case types identified in 2 above and consult the Head of HRC before a decision is made on non-accepted offers (refused or failed to view). The Head of HRC will decide whether the final decision made on these cases should be reported to the Lead Member or Councillors.



APPENDIX 1 - CURRENT DEMAND GROUPS

Demand Group	Band	Qualification Criteria
Former Service Tenants	A	Council employees who have been a service tenant for at least five years and need to be moved from accommodation which goes with the job in accordance with WI 4
Decants	A	Brent tenants where the property is imminently required because of lease expiry or for essential work. (eg. Redevelopment scheme) as agreed by the Director of Technical Services or Regeneration Manager
Medical Housing Register	A	Emergency banding granted only in exceptional circumstances as recommended by the Medical Officer, when the applicant or member of their household has a life threatening condition, which is seriously affected by their current housing.
Medical Transfers	A	Emergency banding granted only in exceptional circumstances as recommended by the Medical Officer, when a Brent tenant or member of their household has a life threatening condition, which is seriously affected by their current housing.
Management Transfer	A	Agreed in exceptional circumstances by the Allocations Panel due to significant and insurmountable problems associated with a Brent tenants occupation of a dwelling and there is imminent risk to the tenant or their family if they remain in the dwelling.
Exceptional Social Grounds	A	Agreed in exceptional circumstances by the Allocations Panel due to significant and insurmountable problems associated with the applicants occupation of a dwelling other avenues to housing have been exhausted
Homeless	A	<p>1. Landlord wants the property back OR</p> <p>2. Property not suitable to meet applicant's or a member of the applicant's household's needs.</p> <p>AND the only prospect of meeting these needs is by permanent accommodation e.g. where they have</p> <ul style="list-style-type: none"> ➤ obtained employment & are experiencing severe financial hardship ➤ severe medical or disability reasons ➤ severe harassment ➤ severe violence ➤ severe disrepair ➤ An exceptional number of TA placements ➤ A very long waiting homeless household in comparison with other families <p>Applicants who were placed in supported housing where they are ready to move on and it is not possible to meet this need through further temporary accommodation. All homeless applicants in this category are owed a full homelessness duty by Brent Council.</p>
Statutory Duty	A	Closing Order issued (i.e. Properties unsuitable for human habitation as advised by Brent's Private Housing Service where there is no alternative measure to render the property habitable) or Similar duty where emergency re-housing is essential .e.g. CPO To enable site clearance for a road widening scheme
Social Services-Children In Need	A	To enable fostering where agreement has been reached to provide permanent accommodation on the recommendation of Brent Children's Services



Release Adapted Property	A	At Brent's discretion where there is an unmet need for the property occupied e.g. tenant does not require walk-in shower &/or wheelchair accessible features
Underoccupation £4000 Incentive Scheme	A	Brent tenant is willing to move to smaller property under Incentive Scheme. moving to studio or one bed or giving up two or more bedrooms in accordance with WI 5.
Unauthorised Occupants/ Succession to tenancy	A	Occupants of Brent Council property approved by Allocations Panel for an offer of smaller accommodation in line with succession policy
Decants	B	Brent Council tenants who need to be moved to allow major repairs or full scale rehabilitation/conversion work to be carried out.
Medical Transfers	B	Band B status for Brent tenants with medical need as recommended by the Medical Officer will only be given where an applicant's or a member of the household's current housing conditions are having a major adverse effect on their medical condition. It will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable.
Medical Housing Register	B	Band B status for medical need as recommended by the Medical Officer will only be given where an applicant's or a member of the household's current housing conditions are having a major adverse effect on their medical condition. It will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable.
Homeless	B	Accepted as Homeless and in priority need by Brent Council and making own arrangements, or accommodated in B&B, or in Hostel. Where an applicant is assessed as suited for supported housing then the banding will be band C (for example those aged under seventeen years and six months who have been accepted as homeless and in priority need). Once an assured shorthold or non-secure tenancy is offered such homeseekers move to band C until such time as the landlord wants the property back or their needs can no longer be met when their banding may be reviewed.
Management Transfer	B	Brent tenants where urgent rehousing needed due to violence or reasonable fear of violence, or due to exceptional social, educational or economic circumstances. This includes situations where the household or a member of the household is the victim of systematic and co-ordinated racial attack or harassment and a move away from the immediate threat is considered to be the only solution (See WI. 3).
Unauthorised Occupants/ Succession to tenancy	B	Occupants of Brent Council property approved by Allocations Panel for an offer of smaller accommodation in line with succession policy requiring 2 bedrooms or larger.
Statutory Overcrowding	B	Brent Council Tenants who have been assessed as being statutorily overcrowded in accordance with Part X of the Housing Act 1985
Housing Register	B	Severe Social Hardship Those with cumulative need that has been assessed by the Welfare Panel as severe enough for band B (WI 1) Urgent need to move agreed by housing in liaison with social services/police/other welfare agency, to give or receive care or support for child protection reasons or other urgent social/welfare reasons as assessed and agreed by the Welfare panel
Transfer List	B	Other underoccupying Brent tenants moving to smaller accommodation but requiring 2+bed and relinquishing only one bedroom.
Children Leaving	B	Young people referred by Brent Social Services who are unable to make alternative arrangements.



Care		
Probation Service	B	Applicants nominated to the Brent Council by the Probation Service to avoid the risk of reoffending and where housing is a particular issue as judged by the Probation Service in Brent. Also, those applicants assessed by the MAPPA meeting as exceptional and requiring rehousing.
Social Need-Children In Need	B	Existing tenants and non-tenants referred by Brent Social Services where accommodation is needed on grounds of children's welfare e.g. child protection cases.
Adults Social Care		To release supported housing and approved for independent living by Brent Social Services and The Housing Department.
Severe Social Need		Multiple needs that warrant high priority.
Voluntary Organisations	B	Single people or couples, referred from a number of voluntary organisations within Brent which assist homeless people, who do not qualify under homeless legislation; are aged 18 or more; have lived in London through the previous 12 months; have a local connection; are unable to obtain housing outside the public sector; and appear capable of coping with independent living (See Appendix 5).
Stonebridge Regeneration	B	Tenants of the Stonebridge Regeneration Scheme nominated to the Council through the nominations agreement.
Homeless	C	Homeless who are owed a homeless duty by Brent who are occupying temporary accommodation provided under Housing Act 1996 Part VII section 193(2) or Homelessness Act 2002. Other homeless households as assessed by Brent Council. Former homeless households who have accepted qualifying private sector offer as part of a discharge of their homeless duty.
Transfer List Housing Register	C	<p>i) Overcrowding Households who do not have the following minimum provision</p> <ul style="list-style-type: none"> ➤ Co-habiting couples - 1 bedroom ➤ Each independent adult (18yrs +) - 1 bedroom. However siblings of the same sex who are 18+ and living as part of a larger household, will be expected to share ➤ Children of opposite sex where at least one child is aged over 7 years should not have to share a bedroom ➤ Two children of the same sex - 1 bedroom unless one child is aged over 10 years and there is an age gap of 5 years or more. <p>N.B For this purpose:</p> <ul style="list-style-type: none"> (a) Second reception room will generally be deemed as available for use as a bedroom. (b) Box rooms which could reasonably be used by a child will count as a single bedroom (c) Single persons occupying studio flats will not be deemed overcrowded <p>ii) Insanitary conditions that cannot be addressed by Housing Office action including Lacking one or more of the following:</p> <ul style="list-style-type: none"> (a) Food preparation facilities (i.e. sink and space for a cooker) (b) Inside WC (c) Bathing and personal washing facilities



		<p>iii) Poor Conditions in private sector accommodation As assessed by Environmental Health or other appropriate officer</p> <p>Band C status for medical need will be given where an applicant's or member of the household's current housing conditions are having an adverse effect on their medical condition which creates a particular need for them to move as recommended by the Medical Officer</p> <p>Social welfare hardship Accommodation required to assist Social Services in delivering a care plan or to relieve other social welfare hardship as agreed between social services and housing and agreed by the Welfare Panel.</p>
Contributions to Mobility	C	Incoming nominations accepted by Brent.
Sheltered Housing	C	Those who require sheltered housing. Those currently in sheltered housing will not receive this priority
Extra Care Sheltered Housing	C	Those who require extra care sheltered housing. This will be assessed and agreed by the Extra Care Sheltered Panel. Applicants must be eligible for a care package from Social Care, be in housing need, willing to accept the facilities within an Extra Care scheme and not able to resolve their housing issues.
Transfer Housing Register	D	All other transfer and Housing Register cases



APPENDIX 2 - ALLOCATIONS DWELLING SIZE CRITERIA

When working out the number of bedrooms required by a household, the following applies:

1. CURRENT POSITION

- One double bedroom for a cohabiting couple
- One double bedroom for two additional persons/children of the same sex and generation.

Note: Where a child is expected and this will make a difference to the bedroom size an extra bedroom will only be allocated when the child is born (Birth Certificate needed).

- One double bedroom for two children of the opposite sex, where both children are under 7 years.
- One double bedroom for two children of the same sex unless one is over 10 years of age and there is an age gap of more than 5 years.
- One double bedroom for two dependents of the same sex over 18 years of age.
- One single bedroom for each person who the Council's Medical Officer considers should have their own bedroom on health grounds.
- One single bedroom for any other person included as part of the household.
- Single people will normally be considered for Bedsit accommodation.
- A couple or single parent with a child under two years of age can be offered a one bedroom property.

Under the Locata scheme applicants will have more choice regarding the size of accommodation that they wish to be offered. Properties will be advertised with a maximum size of household which will allow applicants to overcrowd themselves according to the Council's standard.

2. ROOM SIZES

Double bedrooms are defined as being 110 square feet or more in area. Single bedrooms must be at least 50 square feet. Rooms smaller than this do not count as a bedroom.

In July 1998 the Housing Committee reintroduced the policy of offering a one bedroom property to couples or single people who are expecting a child or who have a child under two years of age at the time of the offer. This policy applies to all cases on the Housing Register Points Scheme (not to tenants). It applies to cases approved before and after the decision was taken.



APPENDIX 3 - CRITERIA FOR REASONABLE OFFERS

A reasonable offer is one where the dwelling concerned is appropriate in terms of its size, floor level, special needs features, condition and location. The criteria used to assess appropriate size are set out in Appendix 2. This Appendix deals with the other four aspects.

1. Floor Level - for most applicants' floor level is not a factor in determining reasonableness.

2. Specific Needs - for offers to applicants with specific needs to be reasonable the rules set out below have to be complied with :

(a) The dwelling should have no physical characteristics which make it unsuitable for any member(s) of the applicant's household. Judgement of unsuitability is based on Occupational Therapist advice in the case of physical disability, on Medical Assessor advice in the case of medical factors and the Mental Health Support Team in the case of mental illness.

(b) Accommodation adapted for people with disabilities should only be offered to appropriate applicants. Dwellings can be adapted to suit the particular needs of individual households.

(c) On the basis of Medical Assessor advice, certain types of dwellings can be regarded as unsuitable for particular applicants.

(d) For visually impaired people with guide dogs an exception is made to the tenancy condition which prohibits dogs in flats or maisonettes. This means that an offer of these dwelling types is reasonable. Restrictions in the Conditions of Tenancy on the keeping of pets are not acceptable as grounds for claims that offers are unreasonable.

3. Condition - The condition of an offered dwelling is considered to be reasonable if it either:

(a) matches the ready to let criteria specified in the voids procedure; or

(b) fails to match the ready to let criteria but the work necessary to achieve compliance has been specified and details of this are available to the applicant.

Where internal decoration is required, this would only be included in the works specification where applicants, due to age or disability, could not decorate for themselves or where the decorative condition is particularly bad. In all other cases the availability of vouchers under the 'Get You in Service' is considered to be sufficient to make an offer reasonable in terms of its internal decoration.

4. Location - WI 8 explains how the choice system operates.



APPENDIX 4 - DWELLINGS WITH ALLOCATIONS RESTRICTIONS

Over 50's Blocks - At Elms Gardens, Macmillan House, Midlothian House Bellamy House and John Perrin Place dwellings are only let to people who are 50 or older.

Sheltered accommodation and bungalows - let to those aged 60 years or older, although there is discretion to allocate flats to slightly younger applicants if necessary.

Lodge Court, Manor Court, Wembley Central - no children under 16 years old allowed. This restrictive covenant was included when the leasehold title was drawn up and overrides normal council policy.

Crispian Close, Neasden - no children under 16 years old allowed above the ground floor. A maximum of 10 children under 16 years are allowed in the ground floor properties. These restrictions were imposed at the planning stage because of the high level of traffic and the close proximity of the road which could be a danger to children.

Private Finance Initiative Properties The Executive agreed on 8th October 2007 to amend the Allocations Scheme to allow for the introduction of a temporary to permanent scheme within the Borough. The advantage of such a scheme is that it avoids some of the uncertainty that can occur for homeless households by having to move on a regular basis. The scheme allows for homeless households to remain in their temporary accommodation and for it to be converted into a permanent assured tenancy with a registered social landlord. Such lettings are therefore not advertised through Locata. All lettings will be made in accordance with the eligibility criteria which will ensure that the appropriate size and type of property will be offered to households where there is a full and continuing duty to house.



APPENDIX 5 - VOLUNTARY ORGANISATIONS

THE SCHEME

This scheme was introduced as a method of allocating difficult to let bedsit and one bedroom properties not in demand from priority cases. The aim of the scheme is to provide accommodation for non-priority single homeless people or couples who do not qualify for assistance under the 1996 Housing Act Part 7. The demand from this group is potentially vast and, in order to achieve confinable numbers, referrals are accepted from a variety of organisations specialising in the field of single homelessness. Usually the organisations chosen run short stay accommodation for their clients as this will generally represent the last resort for people who have often been homeless for some time and who will therefore be most dependent on the Council's help.

GUIDELINES GIVEN BY THE COUNCIL TO NOMINATING ORGANISATIONS

To ensure that those people referred by the organisations have connections with Brent and that the nominee could cope with the accommodation offered to them, which is mainly in high-rise blocks on high density estates, the Council has given criteria to all the organisations which all their nominees must fulfil before they are offered accommodation by the Council. The quota to each organisation is split between bedsit (studio) and one bedroom accommodation. The organisation is responsible for deciding which applicants should be nominated for each type of accommodation and explaining the position to those who are nominated for bedsits. Those who are nominated for one bedroom accommodation can also bid for bedsit properties, but those who are nominated for bedsit accommodation will not be eligible if they bid for one bedroom accommodation. If they require one bedroom accommodation then the nomination should be withdrawn and consideration given to renominating for a one bedroom when a quota place becomes available.

THE CRITERIA ARE SET OUT BELOW:

- (a) The nominee must have resided in London throughout the last 12 months.
- (b) The nominee must be 18 years or over.
- (c) The nominee must have an established and stable connection with the area of Brent e.g. in the form of residence or employment.
- (d) The nominee must be unable to secure housing outside the public sector.
- (e) As far as can be determined, the nominee should be capable of coping with independent living in social housing.

None of those people referred to the Council by the organisations should be in a priority group under the terms of the 2002 Homelessness Act because of vulnerability. Any clients of the organisations that are vulnerable are dealt with under the homelessness procedure.

THE ORGANISATIONS



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A number of different organisations have access to this scheme and the number of organisations with nomination rights may vary from year to year depending on their requirements and projections of supply. Decisions on which organisations receive a quota and how much this will be are made in consultation with Brent's Supporting People Team.



APPENDIX 6 - Eligibility for the Housing Register

The following people are eligible for inclusion on the Housing Register:

- People over sixteen years of age
- People in hospital, prison or the armed forces whose last address was in the Borough.
- People over sixteen and rehoused temporarily outside the Borough under our interim duty to provide temporary accommodation for homeless applicants.
- People resident outside the Borough.
- People who the council considers should be qualifying persons, on a case by case basis, because of exceptional circumstances or special needs
- Other persons who are qualifying persons by law
- People referred by another Borough under the homelessness rules where we have a duty to assist.

The following people are not eligible to appear on the Housing Register:

Homeseekers/tenants will be excluded from the scheme if:-

- a) they are ineligible under the law due to their being subject to immigration control or being a person from abroad, who is ineligible for housing assistance
- b) they, or any member of their household:-
 - have been guilty of serious anti-social behaviour and a possession order is being sought or has been obtained
 - have assaulted a member of staff and an injunction is being sought or has been obtained
 - knowingly give false or misleading information or withhold information that has been reasonably requested

Homeseekers/ex-members have a right to ask for a review of a decision to refuse or to terminate or to re-include their inclusion on the Housing Register:-

A fresh application will be considered if:-

- i) the applicant's immigration status has changed,
- ii) the applicant can demonstrate good behaviour for at least a year

Where an applicant or any member of their household knowingly gives false or misleading information or withholds information that has been reasonably requested a fresh application will not be accepted for one year.



Out of Borough Applicants

Applicants can apply to Brent who are not living in the Borough in line with the legal position. However, there is a severe shortage of housing within the Borough and as a result the Council is unable to prioritise those who live outside of Brent. Each application will be assessed in accordance with the Allocations Scheme. However, the maximum priority that will be awarded to such an applicant will be band C to recognise the applicants' reasonable preference for housing. Out of Borough applicants can bid for housing in the usual way, but such cases will be considered after Brent applicants in the same band. So if an Out of Borough applicant is in band C they will be considered after Brent applicants in band C but ahead of Brent applicants in band D. This Out of Borough policy will not apply to those applicants to whom Brent has accepted a duty and who have been placed outside of the Borough (for example accepted homeless households and care leavers). The Out of Borough policy will apply to those who are in other Boroughs in the West London area and apply to Brent including on any bids that they may make on the Cross Borough page.

Multiple Registrations

The Law allows applicants to apply to any Borough that they wish to. If applicants apply from outside of Brent they will be subject to the Out of Borough policy as outlined above. However, it is also important that applicants who apply to a number of the Locata partners do not receive an advantage over other applicants. If applicants apply from another Locata Borough they will be advised that they should in the first instance register with their own Borough as they will receive the advantage of being registered as an in Borough applicant with them and not as an out of Borough applicant with Brent. If the applicant wishes to move to Brent they can bid on the cross Borough section of the Locata Home magazine. If the applicant lives in Brent and is a tenant of one of the Locata Housing Associations they will be advised to register with them as the tenant has the advantage of bidding on both the Council and Housing Association pages. If a Locata Housing Association tenant is already registered on Locata then they will not be allowed to register on Brent's list as well as they already have access to Brent's properties through their Housing Association registration. If applicants insist on being registered with more than one Locata Borough then adjustments will be made to their registrations to ensure that they do not gain an advantage over others by being able to bid more than three times per edition.

Owner Occupiers

The housing position within the Borough is such that the Council is unable to assist home owners with housing accommodation. Such applicants will be expected to make their own arrangements to resolve any housing need that they have. This includes co-owners, keyworker and shared ownership housing. If it is demonstrated that there is exceptional need (equivalent to band A) and there is no prospect of resolving the issue in any other way then the case will be considered by the Allocations Panel. However, there is still no guarantee that housing will be offered. Owners will be advised when they register of the Council's position.



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APPENDIX 7 – LOCATA OPERATION

Locata Scheme

The Council provides that most applicants will have access to housing through the Locata Scheme.

Eligibility for membership of the Locata Scheme (Transfers and Homeseekers)

All homeseekers registered on the Housing or Transfer registers of any partner local authority or housing association are eligible for membership. Partners are:-

1. London Borough of Brent
2. London Borough of Ealing
3. London Borough of Harrow
4. London Borough of Hillingdon
5. London Borough of Hounslow
6. London Borough of Hammersmith & Fulham
7. Catalyst Community Housing Association
8. Paddington Churches Housing Association
9. Paradigm Housing Group
10. Acton Housing Association
11. Notting Hill Housing Association
12. Shepherds Bush Housing Association
13. Stadium Housing Association
14. Thames Valley Housing Association
15. Westway Housing Association
16. Inquilab Housing Association

1. Registration and initial assessment

An initial assessment is made based on the information on the application form and any other information available. All eligible homeseekers will be assessed, placed in the appropriate bedroom category and in one of the four priority bandings in date order of registration or of qualification for the band.

Eligible homeseekers will be notified in writing that they have been registered as either a homeseeker or a transfer and that they can bid for homes using Locata Home (the free sheet advertising available properties) and including the following information:-

- Locata Identification Number (LIN)
- band
- priority date
- bed size



Homeseekers and transfers will also be advised that they will be sent coupons for bidding, a list of outlets and explanation of the bidding process.

2. Priority bands (See also Appendix 1 for full listing of bands)

The four priority bands are:-

- band A (emergency and top priority members)
- band B (members with an urgent need to move)
- band C (members with an identified housing need – reasonable preference)
- band D (all other members).

3. Priority dates

The principle to bear in mind is that no-one should overtake existing homeseekers in a band. When moving up a band it will be the date that the higher priority has been given. When moving down a band the new priority date reverts to the date that applied when the member was previously in that band or any earlier date when they were in a higher band. The principle is that when moving down they should be awarded the earliest date that they were in the new lower band, or in a higher band.

Example 1	Priority Date
Member applies to register in January and is awarded band D	January
In February member is awarded band B	February
In March member is awarded band A	March
In April member is down graded to band C	February

Example 2	Priority Date
Member applies to register in January and is awarded band C	January
In February member is awarded band B	February
In March member is awarded band A	March
In April member is down graded to band C	January

Example 3	Priority Date
Member applies to register in January and is awarded band C	January
In February member is awarded band A	February
In April member is down graded to band B	February

Example 4	Priority Date
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Member applies to register for sheltered accommodation in January and is awarded band C	January
In February member changes his mind and wants one bed non-sheltered and is down graded to band D	January
In April member is awarded medical priority - band C	April

Example 5	Priority Date
Member applies to register in January and is awarded medical priority – band B	January

Band A rating will generally be given for a time-limited period (at the registering body's discretion) and in any case will be reviewed at regular intervals to check, for example, whether failure to apply for properties indicates that a member's case is not a genuine emergency.

Priorities within bands will be on a date order basis, according to the date the member was placed into that band.

There is a residual discretion for households whose defining features are deemed to be so exceptional that a higher priority is deemed to be necessary.

The relevant dates for the four bands are as follows:-

Band A

Emergency Medical – date approved as emergency

Management transfer – date approved as emergency

Ex-service tenants – registration date

Urgent permanent decant – date agreed move is urgent

Homeless in Temporary Accommodation – date agreed person is priority

Statutory duty – date of Closing Order or similar

Fostering/Adoption - date of approval of referral from Children's Services

Adapted Property Release – date transfer application agreed for this priority

Non Statutory Successor – date approved for rehousing

Underoccupier – date transfer application (for smaller property) registered

Band B

Medical Hardship – date medical assessment completed by Medical Adviser

Homeless – date of homelessness acceptance or date moved into band B

Statutory overcrowding – date became statutorily overcrowded



Unauthorised occupants (non statutory successor) – date approved for rehousing

Underoccupier – date transfer application (for smaller property) registered

Management transfer – date approved for management transfer

Permanent decant – date tenant agreed for decant

Supported housing release – date verification completed

Young People Leaving Care and other quotas – date accepted as quota

High Priority hardship – date high priority agreed

Severe Social Hardship – date high priority agreed

Bands C & D

For Homeless applicants date accepted as homeless (section 184). For others registration date unless moving from band D to band C because of newly unsatisfactory housing conditions, new medical needs, becoming eligible for sheltered accommodation or new Care Plan when the date of the new assessment is used.

4. Assessments

Following the registration a decision will be made on what follow up action is appropriate, e.g. referral to the Medical Adviser; the Occupational Therapist (OT), Environmental Health Officer (EHO), Homeless Prevention Team if there is threat of homelessness, Social Services and/or the Welfare Panel where there are exceptional circumstances which may need to be considered.

a) Medical Officer

Homeseekers or tenants who indicate that they have an illness or disability, which is affected by their current home, or who may be vulnerable on physical or mental health grounds and in need of settled accommodation are referred to the Medical Adviser.

- (i) Such applicants are requested to complete an Application for Medical Assessment which is referred to the Medical Officer who may consult their General Practitioner or hospital consultant, as appropriate. The Medical Officer may request a report from the Occupational Therapist.
- (ii) Assessments are made in relation to the effect of present housing on the state of health of the homeseeker or members of the household. If there is an adverse effect on the housing of the whole household, the Medical Adviser will consider whether the overall effect on the household is sufficiently severe to warrant the recommendation for inclusion in a higher band.



In each case the recommendation is based on a judgement of need. Applicants will be placed in one of the following bands:-

Band A – Emergency Medical, to be recommended where the homeseeker or a member of the household has a life threatening condition which is seriously affected by their housing or homeless households in temporary accommodation which is unsuitable due to a medical condition.

Band B – Medical Hardship, to be recommended where the current housing conditions are having a major adverse effect on the medical condition of the homeseeker or a member of the household.

Band C – Medical Need, to be recommended where the current housing conditions are having an adverse effect on the medical condition of the homeseeker or a member of the household which creates a particular need for them to move.

Where a household is overcrowded, the medical assessment will take into account the effect of the overcrowding on the health of the household. Overcrowding (unless it is statutory overcrowding which applies to Council tenants only) places homeseekers into band C. The Medical Adviser, in his/her recommendation, will consider whether a household which is overcrowded and contains someone whose health is adversely affected by their housing should be placed in a higher banding (i.e. given extra priority) because of the additional impact on the health of the household.

Medical points into bands

Existing transfer applicants and homeseekers will be placed into the new priority bands, which reflect to a large degree existing priorities. The existing criteria for medical assessments are largely unchanged. Homeseekers and tenants with medical points will be placed into the appropriate band as follows:-

Transfer points	Housing Register points	Band
25 & agreed by the Allocations Panel	25 & agreed by the Allocations Panel	A
25	25	B
20, 15, 10 or 5	20, 15, 10 or 5	C
0	0	D

- The medical Officer will also consider and award an extra bedroom for a carer if required.

b) Occupational Therapist

Where an applicant or a member of the household, has a substantial and permanent physical disability which may place them in disability levels 1. or 2., a referral should be



made to the Occupational Therapist. The OT will visit and carry out a full assessment of the disability and housing needs. The OT, Medical Officer or Housing Officer will place the applicant in one of the following mobility groups (disability levels) :-

1. Wheelchair user indoors and outdoors
2. People who cannot manage steps or stairs and may use a wheelchair some of the time.
3. Independent but can only manage one or two steps.

c) Private Housing Officer

A referral may be made to the PHO for an assessment where a homeseeker has indicated that he/she is living in insanitary conditions, including lacking one or more of the following:- food preparation facilities (i.e. sink and space for a cooker), inside WC, bathing and personal washing facilities.

Where there is a statutory duty to rehouse, homeseekers will be placed in band A. This would only arise in the following circumstances:-

- (i) where the EHO has notified that he has issued a Closing Order (i.e. properties unfit for human habitation where there is no alternative measure to render the property fit) or
- ii) where emergency rehousing essential, e.g. Compulsory Purchase Order to enable site clearance for a road widening scheme

d) Welfare Panel

The purpose of the panel, which is chaired by the Senior Rehousing Officer or Senior Homeless Persons Officer is:-

- **to consider and award priority to homeseekers and tenants.**

Three levels of priority banding will be considered and the homeseeker will be awarded the appropriate band on the merits of their circumstances.

Band B – Homeseekers and tenants

Severe Social Hardship

Those with cumulative need that has been assessed by the Welfare Panel as severe enough for band B (WI 1)

Urgent need to move agreed by housing in liaison with social services/police/other welfare agency, to give or receive care or support for child protection reasons or other urgent social/welfare reasons as assessed and agreed by the Welfare panel



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Band C – Homeseekers

Other social/welfare hardship, e.g. accommodation required to assist Social Services in delivering a Care Plan or to relieve other social/welfare hardship as agreed between Social Services and Housing.

Band C - Tenants

Where a tenant needs to move for social reasons, including for care and support.

The Panel will consider all the details of current care arrangements as requested in the report. This would only apply where the household was not entitled to a separate bedroom under current policy.

e) Learning Disabilities

Cases where the applicant or any member of the household has a learning disability will be identified on First and a referral made to the Learning Disability Officer for consideration and recommendations. Also, they will establish if support is required with the Locata process.

Review

If an applicant disagrees with the assessment of their priority they are able to request a review of their priority. This can be achieved by submitting more information for appropriate consideration. If the applicant is still dissatisfied with their assessment they should write to the Senior Rehousing Officer who will arrange for a Panel consideration of their circumstances so that we can ensure that they has been a fair assessment of the application against the Councils scheme. The result of the review will be provided in writing to the applicant.

5. Rent arrears policy (Homeseekers)

➤ Homeseekers in temporary accommodation

Homeless households in temporary accommodation may be advised that, if they fall into rent arrears, their housing register application may be suspended.

Applications may be suspended when a homeseeker either

- a) refuses to pay the rent
- b) fails to make a commitment to repay arrears or



- c) fails to provide supporting information for a Housing Benefit claim.
- d) accrues an excessive level of arrears
- e) is in arrears such that the landlord is taking action to end the tenancy

If a homeseeker falls into arrears, their application may be suspended. The application will remain suspended until the arrears are cleared or an agreement has been reached to clear the arrears and this agreement has been kept to for an agreed period. Depending on the amount of the arrears and the nature of the agreement, discretion may be exercised to review cases and lift suspensions. Exceptions may be agreed to this policy, in particular for those cases in bands A or B.

➤ **Homeseekers in the private sector**

Where a homeseeker is in the private sector then any arrears will not be taken into account. However, where they have lost their previous accommodation through the non-payment of rent or they were previously Council or Housing Association tenants and who have been found to be intentionally homeless they will be treated as ineligible for offers. This decision must be reviewed at regular intervals, or at least once a year.

6. Verification

All homeseekers eligible to bid for properties must have their circumstances and housing conditions verified usually by home visit.

- a) Homeseekers placed in bands A and B and those homeseekers in band C who have been waiting the longest will be notified that a visit is to be arranged.
- a) Homeseekers with medical needs that appear to qualify them for band A or B are to be visited and verified.

The Transfer & Registrations Officer will amend and update the application as appropriate ensuring that all necessary information is noted on the system. Unverified members who bid for property will not be allowed to sign the tenancy. If the property becomes ready and it is not possible to verify the applicant then the property will be withdrawn and offered to the next applicant.

The scheme will be fully explained to the homeseeker at the visit. It should be stressed that homeseekers will no longer be able to wait for an offer – they must actively homeseek if they are to be rehoused.



a) Unauthorised occupants (Non Statutory successors)

Unauthorised occupants for the purposes of this scheme are persons not entitled to take over a tenancy from a secure tenant by succession or assignment who meet the following criteria:-

- persons who would have qualified for succession had there not previously been a succession, are not in priority need but have been living with the deceased tenant continuously for 20 years or more.
- (i) The applicant must complete an application form which is referred by the Housing Office to the Allocations Panel who will determine if the applicant appears to meet the criteria.
- (iii) Unauthorised occupants in priority need approved for move to studio or one bed or giving up 2 or more bedrooms will be placed in band A.
- (iv) Other unauthorised occupants, approved for move to smaller accommodation but requiring two bed or larger and/or relinquishing only one bedroom will be placed in band B.
- (vi) Unauthorised occupiers must be advised that they have 6 months from date of acceptance to exercise choice by bidding for appropriate properties. If they fail to do this they may be made one offer only in line with current policy. If this is refused possession proceedings will be commenced.
- (vii) Although underoccupying accommodation, unauthorised occupants will not be eligible for the underoccupation incentive scheme.

7. Housing for the elderly

Brent has access to three types of accommodation specifically for the elderly. These are:-

Older Persons Dwellings

These are specifically designated for elderly people who can live independently and do not need the services of an Elders Officer. Homeseekers for these units should be aged fifty or over with fairly good mobility as many of the flats are on the first or second floor without a lift.

Sheltered Housing



This type of accommodation is for elderly people aged sixty or over who can live independently but require an element of support.

Extra Care Sheltered Housing

This type of accommodation provides a higher level of support than sheltered housing. There will be on site support workers who will provide care to the tenants. Therefore, applicants who are offered this type of accommodation must require the support that is available. To ensure that offers to this accommodation are appropriately made there is a joint assessment of applicants and decision on eligibility and offers are made through the Extra Care Panel, which consists of Housing and Community Care Officers and officers from the Extra Care providers. Given the additional assessment involved such properties are not advertised through Locata.

8. Processing applications from the elderly

Elderly People may indicate on the application form if they wish to be considered for sheltered accommodation but they may also be referred by relatives, social workers, doctors or sheltered accommodation may be recommended by the Council's Medical Officer.

- (i) Following registration and notification a home visit is arranged for verification for Homeseekers, while Brent tenants are considered by the Housing Office.
- (ii) The Transfer & Registration Officer will advise homeseekers explain how to bid.
- (iii) Homeseekers agreed for sheltered housing will be placed in band C, unless they qualify for a higher band.
- (iv) Elderly homeseekers who do not want sheltered accommodation will be placed in band D unless they qualify for a higher band for other reasons.

9. Labelling properties for advertising

The Allocations Team will describe and label properties which are ready to advertise as being for Transfers or Homeseekers or both, taking into account targets, and set the eligibility criteria for the properties, such as :-

- minimum and maximum numbers of persons in the household
- if children are allowed or required
- if there are age-limits
- the mobility group, if applicable

These are:-

1. Wheelchair user indoors and outdoors



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2. People who cannot manage steps or stairs and may use a wheelchair some of the time
 3. Independent but can only manage one or two steps
- if applications are restricted to special cases such as Quota/ Homeless/ Decant/Key Worker/ same estate
 - if pets are allowed
 - whether it is available for cross-borough bids
 - sheltered
 - Over 50s
 - who owns the property and whether it is a specialist landlord
 - the weekly rent including any other charges

10. Advertising properties

Partners and associates will advertise their vacant properties in a regular free sheet called Locata Home. All properties will be labelled as at 9 above. The freesheet will be made available at various places including housing offices, One Stop Shops and public libraries across the 6 boroughs. It will also be available on the internet at www.locata.org and may be posted directly to homeseekers on payment of a small subscription. Locata, the Partnership's Central Lettings Agency will co-ordinate the freesheet.

11. Bidding for properties

- (i) Eligible members can make up to three bids, per edition, for properties advertised in Locata Home by sending in their completed coupons. They are able to bid by telephone, text, coupon and online via the website, www.locata.org. All members will be sent coupons and more can be obtained by contacting their housing authority. Members who make more than three bids will have the additional ones disregarded.
- (ii) Members with support needs and those who have difficulty with written English will be assisted and encouraged to read the freesheet and choose properties.
- (iii) Members who urgently need to be moved and who do not bid regularly or make appropriate bids for properties may be allocated accommodation directly.
- (iv) Locata checks that all bids for a property meet the eligibility rules. They exclude from consideration all those who are ineligible. Members who consistently bid for properties for which they are ineligible may be contacted to discuss how to bid.

12. Time limits for bidding for properties

Time limits may apply:-



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So that the Council can ensure that properties are allocated as effectively as possible time limits may apply to clients who do not make active bids for properties. In such circumstances the case may be reviewed and action taken. This could include;

- Making bids on an applicant's behalf
- Making a direct offer
- Reducing the priority for that client
- Giving extra assistance to help people bid

13. Eligibility rules

To be eligible, a bid must satisfy the following rules:-.

Rule	Notes
Not offered elsewhere	Making an offer to a member makes all other bids from that member ineligible whilst the offer is live. A person who is eligible for more than one property may be considered for another offer at the landlord's discretion
Not suspended	
On partner's list	If a property is not cross-partner the member must be on the property's partner's list
On correct housing list	The member's housing list (Homeseeker or Transfer) must match that of the property
Bid before cut-off	The bid must be processed before the short list is closed
First three bids	Only the first three bids from a member for each free sheet are eligible
Maximum persons	The members household must have no more than the maximum number of persons for the property
Minimum persons	The members household must not have less than the minimum number of persons for the property
Maximum beds	A member cannot bid for a property with more bedrooms than they are assessed as needing*



Adaptation Required	If the property cannot be adapted to meet the applicants needs then the offer will not be made or it will be withdrawn.
Medical Criteria	Although applicants can bid for properties which are not within the Medical Officers recommendations offers may not be made or be withdrawn if the Council feels that the property is sufficiently beyond the Medical Officers recommendations as to make it unsuitable.
Minimum age	The member must satisfy the age requirement on the property label
Specific Advertised Criteria	The member must satisfy the specific advertised criteria requirement on the property label
Disability Criteria	The member should satisfy the disability criteria as advertised.

- This does not apply to underoccupiers who are allowed to overoccupy by one bedroom in some cases.

14. Selection

All eligible members are placed into priority order. Priority is decided first by band and second by date order within each band, thirdly by registration date and finally randomly. Every bid is assigned a random number when the bid is made. This number is used to resolve ties, the higher number gets priority.

For Family sized property if the property is to be offered to an applicant in band D then priority will be given to cases that include a child or a pregnant woman.

The prioritised list is referred to the landlord for offer.

If there are no eligible bidders for a property, it is referred back to the landlord.

15. Offers

In order to minimise delays the landlord authority may arrange multiple viewings for several members per property. Members are required to bring proof of identity to the viewing. Unverified members may be advised to contact their Housing Officer within 24 hours in order to arrange for verification and confirm their eligibility prior to the viewing date. The detailed procedure for processing offers and nominations is contained in the Allocations Team procedure.



- (i) The Rehousing Officer carries out any further eligibility checks considered necessary, maintaining contact with the exporting landlord throughout the process.
- (ii) The member is offered the property and invited to sign for the tenancy.
- (iii) If the member refuses, the next person is selected. A member is not penalised for refusing properties although checks are likely to be made if several properties are refused.
- (iv) Members who fail to have their verification completed before the viewing date will not be offered the property.

If the previous tenants stated that they were victims of racial harassment, prospective tenants of ethnic minority origin must be advised of this after they have viewed the property and expressed an interest in it, but before they formally enter into a tenancy.

Bed size eligibility

The maximum number of bedrooms for which members are eligible to bid is determined by the size of their household but, as there is a shortage of large homes, members may be advised to bid for smaller accommodation than they would prefer. Where a property has two living rooms and one can reasonably be used as a bedroom, it will be labelled on that basis.

Maximum bedroom eligibility is determined using the following guidelines:-

Lone person	Studio flat or one-bedroom
Couple without children	One-bedroom
Pregnant woman (with or without partner)	One-bedroom
Parent/s with child under two	One or two bedrooms
Parent/s with child over two	Two bedrooms
Parent/s with two children under 10 (see separate group below for sex separation)	Two bedrooms
Parent/s with two children, same sex where at least one child is 10 and there is an age gap of 5 or more years	Two or three bedrooms
Parent/s with two children of opposite sex (one over seven)	Two or three bedrooms
Parent/s with three or four children	Three bedrooms
Parent/s with five or more children	Four bedrooms

An additional bedroom will be allocated where the Medical Adviser recommends this as essential.

Who can be considered part of an applicant's household



a) Other members of the household

- Homeseekers: persons who were part of the household at the date of registration, and are still in occupation.
- Tenants: persons who were part of the household at the start of the tenancy, and are still in occupation.

b) Partners

- A partner who is living in a permanent relationship with the homeseeker or tenant and can prove that they have done for at least twelve months or are married.

c) Children

- Homeseekers: children born since the registration date and dependent children (under 18) joining the household where it can be proved that the homeseeker is the sole legal guardian and that there is no other option for re-housing. Where there is another legal guardian a decision will be made on a case by case basis to agree where it is reasonable to expect the child to be part of the household.
- Tenants: children born since the start of tenancy and dependent children (under 18) joining since the tenancy started.

d) Dependants

- A dependant relative who has joined the household because they are unable to live independently and there are no other options for the family, e.g. the relative owns a property or occupies a property large enough to accommodate the family. Appropriate professional advice will be sought on whether the relative needs to live with the family. Where this is not considered essential, other options, such as sheltered housing, will be discussed with the family before a decision is made by the Housing Assessment Manager as to whether the relative should be included in the application or advised to make a separate Housing Register application.

e) Carers

- A carer, where the homeseeker or tenant can demonstrate that a live-in carer is essential, one has been identified and has moved in with the household or is ready to do so when accommodation is made available and the Housing Assessment Manager (in consultation with the Council's Medical Adviser or Social Services as appropriate) agrees that a carer is essential.

When considering if someone should be accepted as part of a household it is expected that the household member will have an established and permanent housing link with the applicant. They should have been resident as part of the household for an extended



period. They should not have other accommodation which they could occupy. For example children who are shared with two parents will only be considered as part of one household. Extended family members such as cousins, nephews, aunts and uncles would not normally be included as part of a household.

16. Ineligibility for an offer

Members will not be made an offer of accommodation if, at the time they bid for a property, any of the following circumstances exist:-

- (i) The financial resources available to a person to meet his/her housing costs
 - Homeseekers who are found to have sufficient financial resources to obtain accommodation for themselves in the private sector. This would be subject to review
 - Home owners as outlined above.
 - Tenants who have a current application to buy their dwelling or for a home purchase grant e.g. Homebuy, at the time a bid is made for a property.
- (ii) Behaviour of a person which affects his/her suitability to be a tenant
 - Tenants who have any rent arrears, although consideration will be given to varying this rule in band A cases or where other exceptional circumstances apply. (See Rent Arrears Policy).
 - Homeless homeseekers placed in temporary accommodation who have rent arrears. (see rent arrears policy). Consideration will be given to varying this rule, where exceptional circumstances apply or, depending on the level of arrears, if they have made a satisfactory agreement to clear the arrears and have kept to that agreement for at least three months.
 - Tenants upon whom the Council/RSL has served notice of its intention to seek possession or obtain an injunction, due to breach of one or more of the tenancy conditions.(except rent arrears - see above).
 - Ex tenants, who have deliberately lost their accommodation e.g. eviction due to rent arrears.
 - Tenants who have wilfully damaged or neglected their property or are refusing to allow repairs to be carried out
 - Tenants or new homeseekers or any member of their household who have attacked or threatened staff or with a history of anti-social or criminal behaviour related to housing
 - Households who are under investigation for fraud



- Households where they are being investigated as possibly intentionally homeless
- Households who are pending a homelessness decision as this may affect their banding.

17. Review of members ineligible for an offer

Members in categories (i), & (ii) above will remain in their priority bands and date appropriate to their housing circumstances, but they will not be made an offer. The landlord or local authority, in reviewing the decision will determine whether the ineligibility should continue to apply. Under 16(ii), the member would need to demonstrate, for example, that they have modified their behaviour e.g. by paying off rent arrears, remedying damage or allowing repairs to be carried out. If legal action has been withdrawn or a court order has been given in favour of the tenant, then the local authority will carry out a review.

18. Direct lettings

In certain limited circumstances, partners may use their discretion to allocate properties directly to the following members:-

- “special circumstances”, e.g. multi agency protection panel cases. One offer in line with policy will be made which if refused, members will lose their priority
- homeless & quota homeseekers, who have failed to exercise choice by bidding for properties or where there is a specific need to make an offer, will be made one offer before duty is discharged and will lose their priority
- under-occupiers in very desirable properties, who have highly specific requirements
- ex-service tenants, who have highly specific requirements or who have failed to exercise choice by bidding for properties will be made two offers. If these are refused their case will be referred to a review panel
- transit properties for temporarily decanted tenants. If the offer is refused possession proceedings will be commenced.



- tenants who are reluctant to be decanted. If the offer is refused possession proceedings will be commenced.
- unauthorised occupants who have failed to exercise choice. If the offer is refused possession proceedings will be commenced.
- Other urgent cases that are unable or unwilling to take part in the Locata system.
- If a similar property was previously advertised then this shortlist may be used to reduce void periods.
- If properties ready and just missed the deadline for advertising then a direct offer may be made often by using Locata shortlist for a similar property.
- If a property is proving difficult to let then a direct offer may be used although the applicant offered will need to have the appropriate priority.

In the above cases, a reasonable offer will be made. A reasonable offer of accommodation is one which so far as possible is in an area which the applicant has chosen and matches the size and type of property the applicant is eligible for.

19. Refusals following direct lettings

The applicant is required to complete a Refusal of Accommodation form giving reasons. This is faxed by the Housing Office or Housing Association to the Allocations Team.

If the offer is to a homeless household the reasons for the refusal must be considered in conjunction with the Resettlement Team.

The Caseworker will consider the reasons for refusal. If there is a clear mis-match e.g. where the applicant or property details were recorded incorrectly, the offer will be withdrawn and the applicant notified by letter.

The Allocation Team will decide whether the offer was reasonable and the Caseworker will inform the applicant by letter. If the offer is not reasonable, they will withdraw the offer and reinstate the priority.

If the offer is reasonable, the Caseworker will advise the homeseeker of the Manager's decision and the effect this has on their application.



20. Feedback on Let Properties

All properties let through Locata are listed in a future copy of the Locata Home. This will show the number of bidders for each property, the band and registration date of the successful member. This will allow members to judge which properties they are likely to be successful in bidding for. It will also allow members to judge the waiting period and priority required for a particular property. From this they will be able to make judgements regarding the property that they should bid for if they are to be successful in being rehoused. For some members the feed back will show that they are very unlikely to be successful as there will always be other members who have a higher priority bidding for properties. These applicants will be able to consider alternatives to permanent housing including options in the private sector, home ownership and out of London opportunities.

21. Housing Association Tenants

Brent continues to aim to work in co-operation with its Housing Association partners to meet housing need across the Borough. The introduction of the Locata scheme and the fact that many of the Boroughs Housing Associations have joined Locata is an indication of this co-operation. Those Housing Associations that have joined Locata have also agreed to assess their tenants in accordance with Brent's Allocation Scheme. As a result Brent will allow tenants of Locata member Housing Associations to bid on Brent's page for properties that are advertised. If a tenant from one of these Housing Associations reaches the position where an offer might be made then a verification will be requested from the Housing Association. For the offer to proceed it will need to be established that the client has been assessed in accordance with Brent's scheme (to ensure consistency and fairness) and that if the tenant is housed that the Housing Association will give the resultant void to Brent as a 100% nomination (a reciprocal). If either of these criteria are not met then the offer will not be made.

21 Sustainability and Lettings Plans

The Council is keen to ensure that the lettings it makes are sustainable and provide long term housing solutions for applicants. The provision of choice based lettings assists in this aim by allowing applicants to make a positive decision to live in a particular area. In addition Brent aims to contribute to the establishment of sustainable communities which will thrive and be positive places for the people of Brent to live in. Therefore, Brent will sometimes use a lettings plan to set parameters for the letting of larger schemes. Issues that the Council might include within such a plan would be the child density and consideration to not filling every property to its maximum, the mix between existing tenants and homeseekers, the method of advertising and letting to ensure that applicants have full information. Brent's policy has not been to place restrictions on lettings in terms of the economic activity of the applicants. It is believed that such issues are better resolved by the tenure mix within a scheme and support to new tenants to assist them in becoming more economically active. Lettings Plans will be developed and agreed with the Housing



Number: FS35137

Associations where it is felt that a plan is necessary taking into account the general policy and housing need within the Borough.

22 Regeneration

Brent has an excellent record in the regeneration of its estates and communities. The Allocation Scheme aims to assist in this process. This can be achieved by sometimes restricting properties so that they are only available to tenants or Homeseekers in a particular estate or area. For example the Council may advertise a property in South Kilburn with priority for South Kilburn tenants or for a particular phase within the Regeneration scheme. Prioritisation will still occur within the general criteria of the Allocations Scheme but those applicants who are identified will be offered accommodation first. The major regeneration of South Kilburn is currently progressing and Committee has already agreed to prioritise tenants within the initial specified blocks for housing as decants. Although, most tenants will be housed, within the area, in the new schemes which are currently being developed some will be housed outside the area. This will mean restricted access for other applicants so that the regeneration of this area can be progressed. There may also be cases made offers who are part of a larger household where separating the household will aid the Regeneration process. All such cases will already be part of the household.



Number: FS35137

AH038

Planning and Housing Committee – Overcrowding in London Response from GLA Housing Unit

Assembly hypothesis:

To test whether, if the focus of the housing strategy were to shift towards increasing the supply of bigger homes, there would be a more significant impact on solving housing problems at every level than the current target driven approach that produces more, smaller homes.

Q1 *What are your views on the proposition that ‘increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding’?*

Increasing the supply of family-sized homes across all tenures will help tackle overcrowding. However, the picture is complex and, in social rented housing, the levels of overcrowding are so great that the provision of larger numbers of new homes cannot, of itself, wholly tackle the problem. This is why, in addition to adopting a stretching target for the delivery of new family-sized social rented homes, the Mayor has also recently published an Overcrowding Action Plan. This brings together best practice examples from across London to demonstrate the many innovative ways that boroughs, housing associations and other partners are working together to tackle overcrowding.

This can be found at the following link:

http://www.london.gov.uk/sites/default/files/Overcrowding_Action_Plan.pdf

Q2. *What are the obstacles to increasing the supply of larger family homes?*

The main drivers for building smaller as opposed to larger homes are different in some respects in the market and affordable sectors. But in both, it is viability that is the key determinant.

With regard to market housing, developers are primarily driven by commercial considerations, based on their analysis of the market into which they are seeking to sell these homes. The dominant market view is that, in London, they can generally make more, and quicker, profits from delivering primarily one and two-bedroom homes than from larger family-sized homes, especially on flatted developments. In the social rented sector, the proportion of family-sized homes built is mainly dependent on the viability of these homes, which is fundamentally dependent on the level of grant and future rents, which determine how much they can borrow to support development. Intermediate housing is somewhere between the two, as it is part grant funded, with housing associations also using the revenue surpluses generated from intermediate housing to part finance the further development of affordable housing.

Overlaying these factors are the drivers towards more units as a result of the Treasury and central government setting targets primarily in terms of “units delivered” rather than the size mix of those units. This feeds down throughout the development process in terms of decisions on both planning and on housing investment.

These arguments are also reflected in the report '*Think Big: Delivering family homes for Londoners*', jointly published by London Councils and the National Housing Federation. This set sets out twelve factors inhibiting the delivery of more family homes. The top three are: the need for developers of new housing to get the best value for the land they purchase, creating an incentive to build more, smaller homes; the fact that local authorities do not make the requirement for family-sized homes clear enough in their planning policies; and the economic viability of developing family-sized homes for housing associations when rents and grant levels are not high enough.

This report can be found at the following address:

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Q3. The Mayor plans to tackle overcrowding in social rented housing by:

- ***Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and***
- ***Implementing the Mayor's action plan to reduce overcrowding in social housing***

How effective are these measures likely to be compared with other policy initiatives such as introducing a temporary moratorium on the building of small homes?

[The response below assumes that the proposed moratorium is intended to apply to social rented homes, rather than being a moratorium on all new one and two bedroom homes, including those in the market sector.]

As mentioned in response to question one above, overcrowding in social rented housing is a complex issue and requires a range of approaches to tackle it. These include making better use of the existing stock, as set out in the Mayor's Overcrowding Action Plan. It also requires the delivery of a full range of new housing – both small and family-sized as discussed above.

The GLA's 2008 London Strategic Housing Market Assessment showed that 58% of the need for new social rented homes is for one and two bedroom homes and the provision of these smaller homes plays an important role in tackling overcrowding and other housing need, including:

- Providing better options for underoccupiers who may wish to downsize, thus freeing up family-sized homes to help meet housing need
- Providing options for concealed households within overcrowded households – for example non-dependent children who could have a tenancy of their own
- Making the greatest contribution to reducing the number of households in temporary accommodation

Introducing a temporary moratorium on the building of small homes would have no immediate effect in terms of delivering additional larger homes, because, in most cases, it takes a number of years for new homes to go from the first planning application stage to completion. However it would have an immediate effect on delivery of the current housing pipeline, as it would stall the development process on many schemes. The

moratorium would result in some sites with planning permission losing their ability to attract HCA funding, creating a significant delay while new plans would have to be prepared and taken through the planning and housing investment processes.

Another issue to consider here is the mix of homes that would be created through new schemes that come forward during any such moratorium. In these schemes the intermediate and market housing would continue (one assumes) to be mostly one and two bedroom homes and the social housing would be all family housing. Given the shortage of family-sized social rented housing and the consequent priority given to families in greatest need, the resultant child densities would not be a recipe for a cohesive community.

Q4. What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

Prioritising the building of a greater number of larger homes would have a beneficial effect on tackling overcrowding as set out above, but would be most effective as part of a wider set of actions that can be taken to tackle overcrowding.

However, within a given amount of funding for affordable housing, any increase in the number of larger social rented units will have a negative impact on one of the other priorities for affordable housing – whether this be the need for one and two bed social rented homes; the desire to assist Londoners to become home owners through low cost home ownership products; the quality and environmental standards of the new homes and the desire to promote mixed communities. While it may be determined that tackling overcrowding is a high priority, refocusing resources to tackle this issue means inevitable trade offs with other Mayoral priorities.

Planning and Housing Committee – Overcrowding in London

Response from GLA Housing Unit - Supplementary questions

Q5. What are the issues surrounding house building economics on increasing the supply of larger family homes?

The key points that would be made here have been made in answer to question two above.

Q6. What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

Reducing the availability of public funding for social rented housing will have an impact upon delivery of new homes. However the extent of this impact is difficult to estimate, as public finance is only one of the variables affecting the supply of such homes, including:

- Planning requirements – aside from the impact of the tenure and mix of homes required by the planning authority, viability is affected by a borough's S106 requirements. In addition to seeking affordable homes through a S106 agreement boroughs will often ask for contributions towards education, local transport and infrastructure, all of which impact upon the number of social homes that can be built and/or the amount of public subsidy required.
- Availability and cost of other finance – public sector subsidy is only one element in the package of funding that is needed to develop a scheme. Equally important is the availability and costs of borrowing from banks and other lenders to fund the development. As we saw during the credit crunch a shortage of loan finance has a detrimental effect upon residential development even where public subsidy is available. Developers are still finding it difficult to secure the construction finance needed to start construction. Also with so much of London's social housing being built on mixed tenure developers the lack of buyers for the open market homes, due to the difficulty of obtaining mortgage finance, has further undermined the viability of many developments.
- Development costs – land, infrastructure, construction, and dealing with any abnormal site conditions all impact upon the viability of a development and hence the need for public investment.
- The revenue costs of repaying the private sector loans, managing and maintaining the homes – most social housing is developed on the basis that it will take 35 - 40 years before the scheme breaks even, ie the loans are repaid and rental income is sufficient to meet the annual running costs. There is already some evidence that uncertainty about future housing benefit levels, rent levels etc are making public sector developers more risk adverse.

The impact of a reduction in public subsidy will also differ over time.

In the short term, the key factor is that in 2008 – 11 there was a large increase in the amount of public finance available for new affordable homes, resulting in a big increase in starts on site. Because public subsidy is in two tranches (at start on site and at completion), significant commitments have been built up on sites that have started

already but will not complete until after April 2011. These will need to be funded in 20011/12 and 2012/13 from what is likely to be a significantly reduced housing budget. As a result, there is likely to be very limited capacity to fund new starts on site.

In the medium term (2014/15 onwards) the impact of a reduction in funding new developments, that is starts on sites in 2011 – 2013, will begin to feed through and may result in a downturn in the number of completions. But, again the extent of any downturn will depend upon what has happened more widely in the housing market, and is difficult at this point to estimate.

In the longer term it is very difficult to estimate, because delivery of social housing is affected by a wide variety of variables in addition to levels of grant.

Q7. To what extent can the Mayor's investment plans be altered to increase the proportion of more family housing?

2010/11 is the last year of the 2008-11 investment round, and we are already nearly half way through the financial year. So, in reality, there is little or no opportunity to make any significant changes to this plan.

However, the Mayor is currently engaged in negotiations with central government on the Comprehensive Spending Review for the period after April 2011. This will require the Mayor to review and revise his current strategic investment priorities for the next spending round in light of the resources available. This will include the overall quantum of affordable housing to be delivered and the size mix and design/eco-standards of these homes.

Q8. What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?

As noted above, the Overcrowding Action Plan includes a very wide range of actions that can be taken to tackle overcrowding, and was developed in partnership with London's boroughs and housing associations.

Q9. How can variable housing grant rates encourage the provision of more family housing?

Variable grant rates already exist, around a target average grant rate, which is expressed both per unit and per person. HCA London is using this flexibility to deliver the current Mayoral targets on the mix and quality of homes – within the 50,000 affordable homes target.

Q10. What other ways are there to increase the supply of larger family sized homes?

The London Plan encourages the supply of family-sized homes through a number of policies including the promotion of mixed and balanced communities, promotion of choice which includes different tenures and size mixes for a range of different households and partnership working, through Opportunity Area Planning Frameworks, to take account of different housing types required. London boroughs could make

greater use of their planning powers to encourage the provision of more family-sized homes.

Q11. What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

The market sector does not provide large numbers of new family sized homes. This in large part reflects developers' assessment of the market (as referred to earlier) but also reflects the fact that London has a very large number of family-sized market homes in its existing stock. In fact, whereas 64,000 (8%) of households in social rented housing are underoccupied (compared to 100,000 or 13% that are overcrowded); nearly ten times as many households, 638,000 (37%) in owner occupation are underoccupied (compared to 50,000 or 3% that are overcrowded).

Planning and Housing Committee – Overcrowding in London Response from GLA Housing Unit –OSRH038 contd

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Planning and Housing Committee – Overcrowding in London Response from GLA Housing Unit - Supplementary questions

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Q6. What are the likely impacts of housing budget reductions on the provision of social rented housing in London?

It is difficult to predict what will happen to affordable housing supply before the outcome of the CSR is known. The Mayor is making the case in the CSR process to retain the maximum possible amount of funding, and affordable delivery will depend not just in the quantum of funding available but also its phasing and what happens more widely in the housing market, which is again difficult at this point to estimate.

Q7. To what extent can the Mayor's investment plans be altered to increase the proportion of more family housing?

2010/11 is the last year of the 2008-11 investment round, and we are already nearly half way through the financial year. So, in reality, there is little or no opportunity to make any significant changes to this plan.

However, the Mayor is currently engaged in negotiations with central government on the Comprehensive Spending Review for the period after April 2011. This will require the Mayor to review and revise his current strategic investment priorities for the next spending round in light of the resources available. This will include the overall quantum of affordable housing to be delivered and the size mix and design/eco-standards of these homes.

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Q10. What other ways are there to increase the supply of larger family sized homes?

The London Plan encourages the supply of family-sized homes through a number of policies including the promotion of mixed and balanced communities, promotion of choice which includes different tenures and size mixes for a range of different households and partnership working, through Opportunity Area Planning Frameworks, to take account of different housing types required. London boroughs could make greater use of their planning powers to encourage the provision of more family-sized homes.

Q11. What role is there for the market in providing more family sized homes and how can this be supported and encouraged?

The market sector does not provide large numbers of new family sized homes. This in large part reflects developers' assessment of the market (as referred to earlier) but also reflects the fact that London has a very large number of family-sized market homes in its existing stock. In fact, whereas 64,000 (8%) of households in social rented housing are underoccupied (compared to 100,000 or 13% that are overcrowded); nearly ten times as many households, 638,000 (37%) in owner occupation are underoccupied (compared to 50,000 or 3% that are overcrowded).

PLANNING AND HOUSING COMMITTEE: OVERCROWDING IN LONDON OSRH039

Response from the Royal Borough of Kingston upon Thames

The information required is presented below under each of the questions asked.
The text of the questions is shown in bold italics.

As part of this review we are seeking to establish the scale and nature of London's overcrowding with additional information from the boroughs. Could you therefore provide details for your borough of:

- ***The most up-to-date information on the waiting list for social rented housing in terms of numbers and size of home required;***

Table 1: Number of overcrowded households on Kingston's Housing Register by bedroom size required as at 1 April 2010

Bedroom size required	Number of overcrowded households on Housing Register
2	688
3	335
4	166
5+	122

- ***Estimates of the scale and nature of overcrowding in social rented housing in your borough; and***

Table 2: Number of overcrowded social housing tenants on Kingston's Housing Register by bedroom size required as at 1 April 2010

Bedroom size required	Number of overcrowded social housing tenants on Housing Register
2	68
3	266
4	72
5+	12

- ***Details of the borough's housing allocation policies and priorities***

Kingston's Housing Allocations policy is based on a banding scheme primarily operated using Choice Based Lettings.

The Allocations Policy can be viewed at:

http://www.kingston.gov.uk/browse/housing/housingstrategies_and_policies/allocations_policy.htm

Your contribution is also being sought on the following four questions:

- 1) What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?***

The Council's current Affordable Housing Supplementary Planning Document (SPD) specifies a tenure split and dwelling mix for new developments as follows:

Tenure split

70% social rented

30% intermediate

Dwelling mix

Social rented	1 bed	24%
	2 Bed	34%
	3 bed	30%
	4 Bed	10%
	5 bed	2%
Intermediate	1 bed	50%
	2 bed	41%
	3 bed	9%

The Affordable Housing SPD can be viewed at:-

www.kingston.gov.uk/browse/environment/planning/supplementary_planning_documents/affordable_housing_spd.htm

However, the Council will review its affordable housing planning policies as part of its establishment of a Local Development Framework and revised Supplementary Planning Documents for the Borough.

The Council has received CLG funding to support its development of an Overcrowding Strategy for the Borough. The latest version of the Overcrowding Strategy can be viewed at:-

www.moderngov.kingston.gov.uk/mgconvert2PDF.asp/ID=5323&T=10

2) What are the obstacles to increasing the supply of larger family homes?

The Council suggests that a number of issues could be considered as part of the London Assembly's investigation:-

- a) Differential grant rates by property size/type.
- b) Developers' concerns about the inclusion of a high proportion of large family social rented units in mixed tenure schemes.
- c) Difficulties in boroughs with a high proportion of small sites and/or high land costs.
- d) Potential for acquisitions to make a greater contribution to the supply of large family units.
- e) Design guidance to facilitate the inclusion of large family units in high density/town centre schemes.

3) The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce social housingⁱ.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

The Council would prefer to receive details of the other potential policy initiatives before commenting on their comparative merit.

4) What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

The Council would prefer to receive details of specific funding priority proposals before commenting on their potential impact.

Comment [H1]:

Department of adult services and housing
Housing needs and renewals division
14th floor Taberner House
Park Lane
Croydon CR9 3JS
Tel/typetalk: 020 8726 6100
Minicom: 020 8760 5797

Sarah Hurcombe
Assistant Scrutiny Manager
City Hall
The Queens Walk
London
SE1 2AA

Contact:
@croydon.gov.uk

Your ref: **OSRH040**
Our ref:
Date: 23 September 2010

Dear Sarah Hurcombe

Planning and Housing Committee: Overcrowding in London

I write in reply to your letter of 21 July. May I first apologise for Croydon's delay in replying. I have set out our responses to your questions below:

- **The most up-to-date information on the waiting list for social rented housing in terms of numbers and size of home required;**

The table sets out applications as at 28.2.10. Many of these cases remain "unverified", and the bedroom need may change as a result of these verification checks.

	Housing register	Social housing transfers	Total
Sheltered	219	98	317
One bedroom	4769	490	5259
Two bedrooms	2656	582	3238
Three bedrooms	1596	708	2304
Four bedrooms +	633	230	863
Total			11981

- **Estimates of the scale and nature of overcrowding in social rented housing in your borough;**

Details as at 30.6.10 Total registered	Number of Overcrowded registered	of which are severely overcrowded
Start position, 01/04/10	740	115
Occupying studio and 1 bed	107	24
Occupying 2 beds	500	53
Occupying 3 beds	121	31
Occupying 4 beds	12	7
Occupying 5+ beds	0	0

- **Details of the borough's housing allocation policies and priorities**

<http://www.croydon.gov.uk/contents/departments/democracy/pdf/617342/hsgallocrev04.09>

What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

For some years the London Borough of Croydon has worked actively with RSL development partners to encourage a greater supply of larger family homes for social rent. Croydon, like many London boroughs has seen an increase in overcrowded and severely overcrowded households on the housing register and increasingly long waiting times for larger properties. The borough's position continues to be that a significant increase in larger social rented properties will promote transfer chains that will both benefit overcrowded households and, in turn, free up smaller properties for social rent. Thus an increase in larger units will, in our view, address local housing needs more effectively, as long as a sufficient supply of one bed properties to meet move-on and independent living needs is also maintained. Over the last few years we have aspired to delivering 30% of the social rented programme as 3 bed properties and 20% as 4 or more bedrooms (and 30% as one bed units). These targets have been reflected in the borough's assessment of bids for affordable housing grant, which gives strong preference to schemes which provide larger homes for social rent. The result has been a dramatic increase in the proportion of social rented homes of 3 or more units, from 19% in the 2004/6 programme, to 42% in the 2008/11.

Clearly the achievement of this level of increase was supported by other key drivers, in particular, the focus within the NAHP in London on delivering larger social rented homes. The introduction of targets for larger social rented homes (initially 35%, then 42%) has been significant in pushing RSLs to develop more schemes incorporating larger homes, in the knowledge that schemes of only one or two bed units are unlikely to be recognised as a priority for funding. This target has also strengthened the local authority's position in negotiations with private developers who have been advised in recent years that the affordable housing provision should include larger units.

The greater emphasis placed on grant per person levels in assessing affordable housing funding bids has also been instrumental in enabling RSLs to promote schemes with a higher element of family housing. Following the credit crunch, many RSLs preferred to develop smaller schemes of mainly family housing for social rent rather than large one and two bed flatted developments. In some cases these were purchased off the shelf from private developers. This was made possible by a grant regime that took account of grant per person, rather than grant per unit rates.

- **What are the obstacles to increasing the supply of larger family homes?**

The main obstacles are:

- The imposition of a fairly inflexible grant per unit ceiling over the last 12 months has significantly reduced the scope to bring forward schemes with a high proportion of larger units, as they are no longer viable for RSLs to produce. In Croydon, a number of schemes offering high levels of 3, 4 and 5 bed houses were dropped by RSLs, given the unfavourable funding regime.
- The target rent formula, which allows only marginally higher rents on larger properties compared to one and two bedroom properties, makes them relatively uneconomic to fund
- In some locations, where high density schemes may be considered appropriate and desirable, the provision of affordable family homes may be constrained due to lack of amenity space, service charge levels, car parking, etc. There may be a trade off between maximising the supply of affordable homes to meet local and regional targets and optimising the development of family homes. Recent studies in our borough suggest that the provision of a large number of family homes on key sites may erode the total dwelling capacity of the sites by as much as 50%. Creative and innovative solutions will be required on such sites coupled with an approach that maximises larger family units on lower density developments.

The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce social housing¹.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

We support the target that 42% of new social rented homes should be 3 bedrooms or more, although not on every scheme.

A moratorium on the production of smaller homes would be counter-productive. The secret to tackling this lies in giving greater flexibility to local authorities to make decisions about the best way of developing a balanced programme in their borough, taking account of local development conditions, available sites, etc, and not through the centralised and rigid imposition of a larger homes only regime. This would lead to many sites not being developed at all or to inappropriate developments of family housing, resulting in unbalanced and unsustainable communities. Scheme costs and grant requirements would soar if only larger homes were developed.

We believe that the transfer of freedoms and responsibilities to London boroughs, through devolved delivery arrangements, offers the best means of achieving the mayor's targets. This will give boroughs greater flexibility to develop their own strategies and policies for meeting the need for larger homes,

¹ http://www.london.gov.uk/sites/default/files/Overcrowding_Action_Plan.pdf

compatible with their local place-making objectives. They will have greater freedom to support schemes that maximise larger family homes in locations and on sites deemed most appropriate for this whilst also seeking to optimise the level of family housing on more constrained sites through developing new and creative approaches.

At borough level, this should be supported by strong local planning frameworks (LDFs) that articulate clear strategies for achieving housing growth, including the development of larger family homes, based on an understanding of their local places and the level and type of housing development that should be pursued in each. Local authorities can use their LDFs to promote very high levels of family homes, particularly on smaller developments, in those locations most suited to meeting this need. They can also seek to generate innovative approaches to optimising the provision of family homes in more constrained developments, which have traditionally yielded very little family housing.

- **What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?**

We already give a high priority to schemes that provide a significant proportion of larger homes and will look creatively at how larger homes can be integrated within high density schemes. However, we also recognise that there is a well-established need for one bed units and a need to look at each individual site and how its development will support local and borough place-making plans. Boroughs need sufficient autonomy to decide how and where to prioritise larger family homes rather than being subject to blanket rules or restrictions that curb their ability to support the right kinds of development in the right places.

Challenges to increasing supply

- **What are the issues surrounding house building economics on increasing the supply of larger family homes?**
- **What are the likely impacts of housing budget reductions on the provision of social rented housing in London?**

The immediate impact, as detailed above, has been a reduction in the provision of larger family homes which require a higher grant per unit than smaller homes. Schemes comprising a significant number of larger houses are now too costly to attract grant. It is likely therefore that RSLs will focus on smaller units again which will bring schemes in at a lower grant per unit level. There is a real danger that we will see a reversal of the progress made in recent years in achieving higher numbers of larger homes.

Mayor's approach:

- **To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?**
- **What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?**

The current grant regime, in our opinion, does not give sufficient recognition or weight to the additional costs to development partners of providing larger family homes for social rent. We believe there should be greater flexibility to fund packages which allow schemes of predominantly high-grant family homes to be balanced by schemes of low grant one and two bed flats, where appropriate.

Devolved delivery arrangements will enable local authorities' greater scope to develop a balanced programme of affordable housing for their boroughs, which will have the potential to promote larger family homes. Boroughs should be asked to demonstrate through their devolved delivery agreements how they will achieve a high proportion of family sized homes through their development programmes.

Other measures for increasing supply:

- **How can variable housing grant rates encourage the provision of more family housing?**
- **What other ways are there to increase the supply of larger family homes?**
- **What role is there for the market in providing more family sized homes and how can this be supported and encouraged?**

A major impediment to the development of larger homes is the target rent formula. This effectively curtails the level of rent that can be charged on larger family homes at a level that is disproportionately low relative to the rent levels charged on smaller properties and relative to the cost of construction of larger properties. This ensures that the grant level required for larger homes is much larger than it need be.

We believe that in future, with the likelihood of a reduction in grant availability and levels, RSLs will have to find alternative ways of cross-subsidising the cost of providing family homes for social rent in future, through for example, including market sale and rent properties within affordable housing schemes. We think that greater emphasis should be given to developing a spectrum of intermediate housing options and products for families in order to maximise choice and address different affordability levels. We support moves to promote an increase in family sized shared ownership dwellings. We also believe that intermediate rent housing for families represents a viable and attractive option to enable families to move from existing social tenancies or to attract housing applicants that would otherwise face long waits for rehousing.

We think that there is a strong need for larger family homes across all housing tenures and that the focus should not just be on larger social rented homes. We frequently find that developers will provide larger homes only for social rented housing whilst continuing to emphasise smaller units among the private dwellings. This potentially results in an unbalanced residential community in areas where the only larger homes provided are in the form of social rented housing. Therefore, we will seek to promote the development of family homes across all tenures through planning policies and targets to be set out in our emerging LDF.

Yours sincerely

Housing needs and renewals service development manager



Response to the London Assembly's Planning and Housing Committee review into overcrowding levels in London's social rented housing

Places for People

October 2010

1.0 Introduction

- 1.1 Places for People is one of the largest property management, development and regeneration companies in the UK. We own and manage more than 62,000 homes and have assets of £3.1 billion.
- 1.2 Our vision is to create and manage places where people want to live and our approach looks at all aspects of communities rather than focusing solely on the bricks and mortar provision of homes. Places for People's innovative approach to place management and placemaking allows us to regenerate existing places, create new ones and focus on long-term management.
- 1.3 Our response to the London Assembly's Housing and Planning Committee's review is closely aligned with our recent submission to the Government's Comprehensive Spending Review. In this response, we therefore set out the economic context and outline what we feel the Government should do to safeguard a sustainable mixed-tenure housing supply into the future, including larger family homes, which will be crucial to combat overcrowding.
- 1.4 In section 4 of this response we deal specifically with the questions raised in the Planning and Housing Committee's review.
- 1.5 Any queries with regards to our response should be addressed to:

Research & Planning Director

Places for People
305 Gray's Inn Road
London
WC1X 8QR

Tel:
Email:

2.0 Context

- 2.1 Over the next five years, getting the right balance between dealing with the legacy of debt whilst stimulating economic growth is going to be critical. In a recent statement, the Minister for Housing and Local Government laid out the conflicting

challenge of the need for provision of housing and the Government's desire to address the fiscal deficit.

- 2.2 Demand for housing is projected to remain strong, with population and households estimated to grow by another 8m and 5m respectively by 2026. This implies the construction of over 300,000 new houses per annum over the next sixteen years. However, the number of housing completions as reported by the CLG has not broken the 200,000 barrier since 1980 and stood at 127,440 in 2009.
- 2.3 Minimal growth in real disposable income levels combined with continued growth in house prices means that demand for affordable housing will continue to rise and the size of the housing market that cannot afford to buy outright at market levels is likely to increase substantially from its current level of 6.8m households (2.6m who receive some form of benefit and 4.2m who are not on benefit but cannot afford to buy a house at lower quartile prices).
- 2.4 In Places for People's recent submission to the Comprehensive Spending Review, we urge the Government to enable Registered Providers to deliver additional housing by enabling the existing social housing grant to be redefined as equity.

3.0 Our proposal: redefining social housing grant

- 3.1 We believe that the Government's best option to safeguard a supply of affordable homes, including larger family homes, is to release the latent assets held on the balance sheets of Registered Providers. The existing social housing grant would be redefined as equity and the private sector would be enabled to provide funding for social housing.
- 3.2 By redefining the existing £35bn social housing grant in the sector and permitting rents to rise over a period of time, the Government would enable Registered Providers to restructure and take advantage of the remaining equity on their balance sheets.
- 3.3 Initial modelling that we have undertaken estimates that redefinition of the social housing grant would release sufficient funding to build 214,000 new affordable homes. As affordable housing would not be delivered as a mono tenure offering, the provision of affordable homes at this level would also lever in market sales. An increase in house building would, we believe, also have an important knock-on impact on the economy in terms of job creation and skills development.

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- 3.4 In order to yield a return to make it attractive for institutional investors, there would need to be a phased increase in rents of 4% in real terms in each of two separate years to generate a sufficient level of return to bring in private sector funding.
- 3.5 If the Government were to go ahead with this proposal, an additional 214,000 houses would be provided at a rent level which is slightly higher than current social rents but cheaper than private sector rented housing. We have calculated that the additional increase in housing benefit from increasing the rents by two amounts of 4% during a 10-year period is £0.55bn per annum in real terms. However, this increase in housing benefits could be outweighed by potential savings in benefit payments due to the difference between these rent levels (£78 per week) and the Local Housing Allowance.
- 3.6 Redefining social housing grant would not only help the Government to meet an increasing demand for affordable housing from a growing part of the population who cannot afford to buy or rent at market levels, but also reduce its housing benefit bill over the longer term. Put simply, meeting the short- and long-term demand for affordable housing is crucial as the more people are forced into more expensive private rented accommodation, the more strain there will be on housing benefit payments.

4.0 Response to the questions raised in the Planning and Housing Committee's review

General comments

- 4.1 As the Mayor acknowledges in his Overcrowding Action Plan, overcrowding not only causes management problems for landlords but also results in a range of problems for communities and individuals, such as lower educational achievement and antisocial behaviour. It also has a marked impact on health and wellbeing and generally on quality of life. These problems have a wider societal and economic impact in that they put a strain on local authority and Government resources. We are pleased, therefore, that overcrowding is high on the Mayor's agenda and that the London Assembly's Housing and Planning Committee is conducting a review of this issue.
- 4.2 Overcrowding is set to become more significant following the recent changes to housing benefit announced in the Emergency Budget. Due to heightened affordability issues in London, overcrowding is likely to increase there more than elsewhere in

the country. The caps on the maximum Local Housing Allowance (LHA) payable by property size in particular will have an impact in terms of households being forced to live in smaller properties where they can still cover the rent using LHA. Naturally, the effects of this will be felt in the private rented sector, although social landlords could see an increase in demand from people unable to afford to stay in their privately rented homes.

- 4.3 GLA 2008 Round Demographic Projections¹ state that the majority of the projected household growth in London will be made up of one-person households, and the average household size will fall from 2.34 persons in 2006 to 2.23 in 2031. However, a paper published in 2008 by the Cambridge Centre for Housing and Planning Research² points out that overcrowding problems in London are compounded by the fact that London households in social housing are on average larger than those in the rest of the country, whilst its social housing stock has a larger proportion of smaller 1- and 2-bedroom homes.

- 4.4 In tackling overcrowding, we feel that a balance needs to be struck between a new and more sustainable system of long-term housing supply, as set out above, as well as managing use of the existing housing stock.

1 What are your views on the proposition that “increasing the supply of larger family homes would effectively tackle the housing problems of more Londoners in overcrowding”?

- 4.5 We feel that an increase in the supply of larger family homes is part of the answer. As set out in section 3 above, it is our view that Government needs to redefine social housing grant in order to enable Registered Providers to build more homes. These homes would be in a mix of tenures and sizes, to meet local and national housing demand.

- 4.6 Places for People agrees with the Mayor that there is a significant undersupply of larger family homes in London's social rented sector to meet the demand of larger households requiring affordable homes. We therefore welcome the Mayor's target that 42% of new affordable rented homes should be three bedrooms or more. However, we also feel that existing stock needs to be used more efficiently, through tackling under-occupancy and

¹ GLA Data Management and Analysis Group Briefing 2009-02, March 2009

² Cambridge Centre for Housing and Planning Research: *Affordable Housing in London: Needs and Provision, Aspirations and Realities*, January 2008

fraudulent tenancies. Given that local authorities via nomination arrangements are the main beneficiary of homes repossessed for tenancy fraud, it is important that current initiatives to support Registered Providers in this area of work are continued.

2 What are the obstacles to increasing the supply of larger family homes?

- 4.7 As stated above, there is a larger problem in meeting the demand for housing in the UK, with house building levels having been below the Government's targets for many years. We feel that this problem needs to be tackled in a more fundamental way, through redefining social housing grant in the way set out in sections 2 and 3 of this response.
- 4.8 An added obstacle to increasing the supply of larger homes in London in particular is the high land values in the capital, and the lack of suitable sites for larger, mixed-use developments.
- 4.9 In our view, the solution should be sought both in the changes to the funding model for social housing as explained above, as well as an innovative approach to building which needs to be adopted in order to enable larger homes to be built on a limited land supply.

2a Supplementary questions:

- **What are the issues surrounding house building economics on increasing the supply of larger family homes?**
 - **What are the likely impacts of housing budget reductions on the provision of social rented housing in London?**
- 4.10 Due to high land values in London, it is more financially viable for developers to build smaller units, especially flats. London boroughs could help to mitigate against this by making disused public land available at lower cost, specifically for larger family homes.
- 4.11 Places for People has long acknowledged that traditional grant funding for affordable housing is not a sustainable model. In the current economic climate, the sector cannot rely on traditional funding if it is to survive. This is why we feel that a new model needs to be implemented which moves the sector away from its dependence on grant. In our view, if the Government were to adopt this model, the impact of the impending cuts to the Government's housing budget will be less keenly felt by the sector, and it will be better able to continue to build much-needed affordable homes, including larger homes.

3 The Mayor has plans to tackle overcrowding in social rented housing by:

- **Introducing a target that 42 per cent of new social rented homes should be three bedrooms or more; and**
- **Implementing the Mayor's action plan to reduce overcrowding in social housing.**

How effective are these measures likely to be compared with other potential policy initiatives such as introducing a temporary moratorium on the building of small homes?

4.12 As said above, we welcome the 42% target. However, the target is less meaningful if a sustainable overall supply of affordable (mixed-tenure) housing cannot be guaranteed. We would therefore urge the Mayor to support Places for People's proposal to change the way social housing is funded in the UK.

4.13 The actions outlined in the Mayor's Overcrowding Action Plan are sensible. In our view, Registered Providers should receive more incentives to tackle under-occupancy and tenancy fraud, so we can more effectively deploy our resources to deal with these issues. We welcome the Mayor's commitment to finding ways to encourage under-occupiers to downsize.

3a Supplementary questions:

- **To what extent can the Mayor's investment plans be altered to increase the proportion of family sized homes?**
- **What other options are available to the Mayor aside from his 42 per cent target for homes with three or more bedrooms and those measures contained within his overcrowding action plan?**

4.14 As set out above, we feel that a new equity funding mechanism is crucial in ensuring that enough affordable homes are built in coming years to meet the growing demand for homes in London and the rest of the country. This would ensure that the Mayor's 42% target achieves real outcomes in terms of tackling overcrowding.

4 What would be the impact of prioritising the building of a greater number of larger homes on other aspects of London's housing needs?

-
- 4.15 London, as well as the rest of the UK, needs more homes in a range of tenures and sizes. The affordability gap is bigger in London than elsewhere, and is set to continue to grow with real disposable incomes due to go down even further. This means that the proportion of people able to rent or buy at market rates will get increasingly small, and an increasing number of people will require some form of affordable housing. In our view, the 42% target needs to be part of a balanced approach which encourages house building across a range of tenures and types.

5.0 Conclusions

- 5.1 Places for People welcomes the London Assembly's Planning and Housing Committee's review into overcrowding levels. In our experience in creating and managing sustainable communities, we recognise the far-reaching effects which overcrowding can have on health, educational attainment, crime and general quality of life.
- 5.2 We feel that there should be a balanced approach between encouraging the building of new homes and managing existing housing stock more efficiently. This is acknowledged by the Mayor in his Overcrowding Action Plan, which we support. In our view, tackling under-occupancy and fraudulent tenancies is crucial.
- 5.3 We emphasise the need for a review of the way social housing is funded in the UK, to make sure that the 42% target for larger family homes in London is meaningful and has a real impact in tackling overcrowding. As we argued in our submission to the Comprehensive Spending Review, we feel that social housing grant should be redefined as equity. Coupled with a rise in social rents, this will enable Registered Providers to build a significant amount of new affordable homes.
- 5.4 High land values in London often discourage developers from building larger homes, as smaller flats are more financially viable in most circumstances. London boroughs could encourage developers to build more larger homes by making available disused public land for this purpose at lower cost.
- 5.5 With the affordability gap set to rise across the whole of the UK and especially in London, we feel that the Mayor's 42% target needs to be part of a balanced approach which encourages house building across a range of affordable tenures and types.

RE: Tackling Overcrowding

I am very pleased to see that you are leading an investigation on behalf of the Committee to examine overcrowding in London.

I am piloting a housing and training/employment project which tackles overcrowding in social housing and ten months into the scheme we have achieved a 60% reduction in the overcrowding status of our participating families. The scheme works on the simple principle that we support the adult non-dependents of the overcrowded social household into a housing association flat for two to three years on an Assured Shorthold Tenancy (AST). Flats are supplied by us and partner associations and they are authorised to count as 'borough nominations' so there is no loss of stock to associations.

A condition of the project is that clients are in, or get into employment and training, and sustain this. For clients who are not already at college or working, we support them into it. The purpose is to build up a client's earning capacity and aspirations so they are no longer reliant on social housing by the end of the three years. We then support clients to move into private accommodation and to consider shared ownership for the future. Since January 2010 we have housed 49 clients and have another 28 waiting for viewings. The pilot scheme is funded by the CLG and the participating local authorities in west London.

Early findings of the scheme indicate a range of interesting facts: the average age of clients is 23; there has been a significant reduction in unemployment of 'NEET' clients and the incentive of a temporary self-contained flat away from the overcrowded household for a number of the clients been the motivating factor to get into work or training. Partner housing associations are happy to contribute and allocate flats on an AST as it remains within their borough quota arrangements; self-referrals are proving an increasingly popular source of referrals. For 'severely overcrowded' households we have seen a reduction of 50% in their 'severe' status.

We are certainly not making an argument to stop building larger affordable homes in London, but we do argue that larger homes should be prioritised for families with younger children who are less likely to become under-occupiers in the medium or longer term. We have recently written a very detailed report for the CLG on the savings the project is making to welfare benefits and have enclosed a copy for your information. If you would like to discuss the project in more detail please do not hesitate to contact me. I would be most interested in the findings of your investigation and please do let me know if you will be holding any events to share the findings.

Yours sincerely



Savings to the national budget as a result of the InComE project

Contents:

1. Executive summary and introduction
2. Benefits of tackling overcrowding through the InComE project compared to HCA capital grant in building larger homes
3. Savings procured by the InComE project by reducing Housing Benefit and Job Seekers Allowance and increasing tax revenues
4. How intervention is reducing the public finance costs of 'NEETS' (clients not in education, employment or training)
5. Savings in local education, NHS and police budgets by reducing overcrowding via the InComE project route
6. Equal opportunities data – reversing national trends
7. Conclusions

Appendix

Appendix 1: Case studies of individual clients

Appendix 2: Equal opportunities data: breakdown of ethnicity, gender and age

Appendix 3: Average Local Housing Allowance over 25 and under 25 per west London borough plus JSA breakdowns

Appendix 4: House type breakdown for clients (studios, flats and houses)

Section 1

Executive summary

The purpose of this report is to demonstrate in real terms the savings that the InComE pilot project is achieving by tackling overcrowding in an innovative way. Based on 38 clients that we have housed in the 10 months since the project started, an actual saving of £1.5m can be demonstrated. Based on the intervention of the project we can also show the projected savings achieved by supporting NEETs (people not in education, employment or training) into study or work. The lifetime costs associated with NEETs are huge, and we have shown in our report (section 4) that we can achieve a saving of £12m¹ through intensive support and early intervention.

If the scheme was rolled out to 100 clients an actual saving of £6m to the public purse would be achieved and a further £35m if we take in to account the lifetime costs of NEETs.

To date the project can also show a 60% reduction in overcrowding for those households where a client is housed by the project.

To calculate these savings we have analysed the project's early findings from four perspectives:

1. Savings to welfare benefits
2. Reduction in the demand for bigger homes and thereby a reduction in HCA grant
3. Tailored training and employment support which is increasing earnings capacity per client and decreasing the public finance costs associated with each 'NEET' client
4. Savings made to the local NHS, police and education budgets through tackling overcrowding via the InComE project

There is no reason why this model could not work in other areas of London and indeed in other parts of the country where overcrowding is causing critical housing pressures.

¹ Based on 38 clients at an 80% success rate of reducing NEETs

Introduction

The InCome (independence, accommodation and employment) project works on a simple integrated model. It aims to tackle overcrowding by offering housing and training and employment support to adult non-dependents living in overcrowded social housing. The objective is to break a dependency on social housing and benefits and increase people's aspirations and career expectations. Clients are offered an Assured Shorthold Tenancy (AST) for two to three years in a housing association flat. The only condition is that they are in, or willing to start college/training or work. We want to reward clients who are doing their best to move forward and incentivise them by providing a housing association flat on a temporary basis; they are only rewarded with a flat once they are in employment or training. There is no upper age limit, our eldest referral is aged 38, but the average age of clients is around 23. The aim of the project is to build up the earnings capacity of each client so that by the end of the scheme they are independent and no longer reliant on social housing. This means that they should be able to move out into the private sector and will have no, or reduced need, for housing benefit top up to cover private sector rents. In the months coming up to the end of their AST in the housing association unit, the caseworkers support the clients to move into private rented flats, in the same way that any other young person in London would be looking for housing.

It has quickly become apparent for some of our clients that the complexity of the welfare benefit system has created the dilemma of 'making work pay'. In addition the severity of the housing benefit taper pushes some of our clients to the margins of their income as they juggle between moving from college, to an apprenticeship or entry-level job whilst paying their rent.

Flats for the project are provided by a pool of housing associations on an AST. These flats have been authorised to count as 'borough nominations' so associations can include them within their existing local authority quota arrangements. Each local authority has set its own borough quotas for the project to reduce overcrowding in its stock and increase employment.

How the scheme works for the client

The project has three stages which each client moves through:

1. Assessment of skills and career aspirations for each client; a family visit, confirmation of family's overcrowding or severely overcrowding status, training and employment support to ensure the client is going

to/at college, university, on an apprenticeship or working. We call this stage '**Control Group 1**'².

2. '**Ready to view**': once a client is enrolled on an appropriate career-linked course or in a job that has good career prospects, caseworkers contact partner housing associations to identify a suitable one bedroom flat or studio. The project has a bank of clients in this category and we arrange multiple viewings. Benefit calculations are undertaken to ensure clients can afford the rent and utility bills.
3. '**Housed clients**': caseworkers provide tenancy support, there is a £750 furniture allowance per client which the caseworker oversees, clients are supported in organising utilities, direct debits and top-up housing benefit or full housing benefit is organised where relevant. Caseworkers provide on-going monitoring of the tenancy and attendance and performance at college and work. Towards the end of a client's time on the project, the caseworker discusses the move on options, supporting them into full independence. On-going training and employment mentoring is also provided.

Allocating larger family homes to younger families

Large family social housing units are at a premium in London, indeed in the country as a whole. Yet an unintended consequence of the social housing allocations system is that bigger family units are often given to families whose children have grown up but are still living at home. In a short period of time these parents can then become under-occupiers as the adult children move out, often into their own social housing units, with low aspirations to break the cycle of dependency on benefits and social housing. Meanwhile, families with younger children who are desperately overcrowded join the transfer queue for a larger home; this in turn can take years as the system is blocked by the families with adult children. Our project seeks to incentivise the adult children supporting them to move out and build up their independence and earnings capacity - with one result being that the original home is no longer overcrowded. In turn the larger units can then be allocated to the younger families who have minimal alternative options instead of being given to the household with adult children. These households also often use their overcrowded status as a means to barter for social housing units for their non vulnerable adult children who are not entitled to social housing in their own right. They can often offer to come off the list for a larger unit in return for their adult child being given their own one bed flat.

² CLG definition meaning supported by the scheme but not yet ready for housing or don't want to be housed by the project.

Financial assumptions for this report

The project is expanding continuously and we have based the financial evidence at the point of 38 clients housed. By the time of this report going to print, the project had reached 49 clients housed and 13 ready to view, a total of 62.

Section 2

Benefits of tackling overcrowding via the InComE project compared to HCA grant expenditure in building bigger homes

How the project is reducing capital costs

Most of the overcrowded families we are working with were waiting for 3 or 4 bedroom homes before we helped move the adult non-dependents into their own flat. Some families had been living in extremely cramped conditions, sometimes waiting for larger family units for over 10 years. Building bigger family homes costs a significant amount of government capital funding from the Homes and Communities Agency (HCA).

Figures from the Connected Partnership³ show that HCA grant for a 3 or 4 bedroom home in London is approx £70,000 – £90,000 per unit.

Since the project went 'live' in January 2010, overcrowding of participating households has been reduced by 60%⁴. **In terms of a net saving of grant made by the project through reducing the demand for bigger units, this calculates as a saving of £1.1m to date:**

£80,000 grant (mid-point between £70k and £90k) x 60% no longer requiring bigger units = £1,120,000.

Reducing overcrowding on a rolling programme

To date, 38 people have been moved out of severely overcrowded or overcrowded homes through the InComE project. Initial indicators show that only 40% of families we are working with are still waiting for a bigger family home. But even with severely overcrowded families we can support the younger siblings – once they become eligible – to move out into their own

³ Connected Partnership is a development consortium between Shepherds Bush Housing Association, Octavia Housing and Origin Housing.

⁴ 14 out of 23 (60%) LA households no longer overcrowded, feedback from 5 of the 7 participating local authorities

flat on an Assured Shorthold Tenancy and receive support to improve their long term job prospects. Since the project started five out of ten severely overcrowded households now require a smaller unit and are considered as overcrowded rather than severely overcrowded, this is a 50% reduction of severely overcrowded homes⁵. As the project continues to expand, the demand for bigger units is reducing all the time. Given that the project works on a rolling basis, with new people moving out of overcrowded homes, the project becomes cheaper and cheaper with each person assisted as the project costs are spread per person.

This is not an argument to stop building bigger social housing units. We know that the failure of housing supply to match demand has led to increased overcrowding in London⁶. Instead, offering a model like the InComE project, which focuses on adult non-dependents, helps to ensure that bigger, more expensive family homes are available to those whose children are younger and where there are minimal alternatives.

The value for money argument is simple. The annual costs of the InComE project are less than the amount of HCA grant it takes to help build 3 four bedroom homes.

Table 1: Comparison of project costs to HCA grant

InComE project costs for 1 year	Amount of grant required to build 3 four bedroom affordable homes
£180,500	£240,000
Target for people housed in 1 year = 60	Maximum number of people housed in 2 four bed units = 21

The accommodation costs to the InComE project are non-existent as the one bedroom flats supplied by the partnership of housing associations count as 'borough nominations' so associations can include them within their existing local authority quota arrangements. Additionally, these flats can be re-used for the project as they are rented out on an AST for a maximum of three years and can then be recycled for a new client.

⁵ To date 10 severely overcrowded households referred to the project, of these 5 are no longer severely and instead are classed as overcrowded. Awaiting data from Royal Borough of Kensington and Chelsea

⁶ Around 207,000 of London's households are overcrowded, an increase of approximately a third on the number ten years ago, with overcrowding affecting one in eight social renting households and one in ten in the private rented sector,

<http://legacy.london.gov.uk/assembly/bmac/2010/jun29/item09.pdf>

Section 3

Savings procured by the InComE project by reducing Housing Benefit and Job Seekers Allowance and increasing tax revenues

The scope of this section looks at the project's savings to the taxpayer through benefit reductions and increased tax revenue by creating job opportunities.

One obvious progression route for unemployed adult non-dependents living in overcrowded social housing is to move out and claim housing benefit on a privately rented flat. The individual would be entitled to draw down both housing benefit and Job Seekers Allowance (JSA). Given that 69% of housing association tenants are 'economically inactive'⁷ this route out of overcrowded housing is probably one of the most likely scenarios.

In Kensington and Chelsea for example, a person aged 25 years and over could claim £298 a week in housing benefit⁸. In addition the individual could also claim Job Seekers Allowance at £65.45 a week. The total cost per week per person would be £363.45 in welfare benefits.

If this cost is spread across the 10 month period January 2010 (the month the first InComE project client moved in) to October 2010 this bill would total: **£15,628 per person**. If we extrapolated this figure across the 10 Kensington and Chelsea clients we have on the project this would total: **£156,284** over the same period.

In contrast the project's costs in the borough are significantly lower. The average rent for the project is £97 a week, and only those studying at college 16 hours a week or less receive JSA (currently applies to 13 clients out of 38 housed). In addition not all our housed clients claim housing benefit; 10 pay their own rent, 7 of the clients receive partial entitlements and the remaining 21 claim full housing benefit. We anticipate that housing benefit claims will continue decreasing as more clients complete their training, improve their earnings capacity and gain higher paid work.

⁷ http://www.housingcorp.gov.uk/upload/pdf/Tenant_survey.pdf

⁸ An average across the Broad Market Rental Area (BMRA) for the Local Housing Allowance which informs housing benefit entitlements per borough. The anticipated cap on the Local Housing Allowance is likely to bring this figure down to £240 per week.

We have calculated the costs associated with each route:

- **Table 2** shows the welfare benefit costs if adult non-dependents move out of home into private rented accommodation and claim housing benefit and JSA. In order to have a fair comparison we have reflected the exact details of the project by matching housing benefit and JSA costs for the precise number of people we have on the scheme allocated by referring borough, so that housing benefit differential per borough is accurately reflected.
- **Table 3** shows the actual welfare benefit costs of the scheme based on the current number of people housed through the project. The reduction in JSA is due to the training and employment support of the project and the motivation of individual clients. The rent of £97 per person per week is based on the real average clients are currently paying host housing association landlords (the rents vary per landlord as opposed to per borough).

Table 2 – welfare benefit costs of 38 people moving into private flats and claiming JSA

Calculated over the period of January 2010 – October 2010 ('live' time of the project)

Borough	Housing Benefit costs*	Job Seekers Allowance*
Brent x 3 people	£28,348	£8,443
Ealing x 5 people	£44,402	£14,072
Hammersmith and Fulham x 15 people	£179,955	£42,215
Harrow x 2 people	£14,792	£5,629
Hillingdon x 1 person	£7,009	£2,814
Kensington and Chelsea x 9 people	£115,326	£25,329
Hounslow x 3 people	£25,977	£8,443
Total	£415, 809	£106, 945
Total benefit cost for 38 people: £522, 754		

*Taken from an average BMRA per local authority of Local Housing Allowance, 25 and over age group

*For housing benefit and JSA we have used the category of benefit for people aged 25 and over as the average age of clients will be 25 or over towards the end of their time on the scheme

Table 3: InComE Project welfare costs based on actual data from 38 people housed on the scheme to date

Calculated over the period of January 2010 – October 2010 ('live' time of the project)

Borough	Housing Benefit*	Job Seekers Allowance*	Disability Living Allowance

Brent Full HB-3, Partial HB- 1, JSA-2, DLA-0	£13,760	£5633	£0
Ealing Full HB-3, Partial HB- 1, JSA-2, DLA-0	£13,760	£5633	£0
Hammersmith and Fulham Full HB- 5, Partial HB- 5, JSA- 4, DLA-0	£27,090	£11266	£0
Harrow Full HB- 2, Partial HB- 0, JSA- 1, DLA- 0	£8,342	£2795	£0
Hillingdon Full HB- 0, Partial HB- 1, JSA 0, DLA-1	£1,247	£0	£2144
Kensington and Chelsea Full HB- 8, Partial HB- 0, JSA- 4, DLA-0	£33,368	£11266	£0
Hounslow Full HB-0, Partial HB-0, JSA-0, DLA-0	£0	£0	£0
Total Full HB- 21, Partial HB- 8, JSA- 13, DLA-1	£97, 567	£36, 593	£2144
Total benefit cost for 38 clients £136, 304			

*8 clients receive partial housing benefit based on individual wages and circumstances; we have averaged this out at a top-up of 30% of the rent. The average rent for the scheme is £97 a week.

*For housing benefit and JSA we have used the 25 and over allowance as the majority of clients will be 25 or over by the end of the scheme

Conclusions:

- Net savings on the welfare benefit bill made by the InComE project in comparison to the welfare benefits costs if unemployed adult non-dependents moved into private flats: **£386,450 just in a 10 month period.**
- Increased revenue to the Exchequer raised through payroll taxation and national insurance contributions for employed clients has been estimated at **£67,726 per annum** based on the actual number of working clients⁹. This is based on an estimated average salary of £14,000 per annum and allows for personal allowance deductions¹⁰. We have not captured tax revenue data on the 12 clients working part

⁹ This includes 10 clients in our 'housed' category, and a further 26 in 'waiting to view' and Control Group 1 categories who are working.

¹⁰ Median average salary of the housed clients who are working full time.

time as they are likely to be earning money below or around the personal allowance threshold.

Section 4

How intervention is reducing the public finance costs of NEETS (clients not in education, employment or training)

A critical part of the project is the training and employment support provided to each client. Whilst our client group is not defined as 'vulnerable', we provide an extra layer of training and employment support alongside the tenancy support. For our NEET clients this support is essential. It involves one to one sessions with clients whilst they are in the Control Group 1 stage¹¹ of the project by identifying career aspirations, encouraging clients to attend college open days, supporting them to apply for jobs and motivating them before and after interviews, and in the early months of a new job. This tailored support continues once a client moves into housing. The case studies in appendix 1 demonstrate the value of this intervention; caseworkers have been involved in everything from arranging literacy assessments through to coaching and mentoring in the workplace.

We aim to support a range of clients from those with strong career aspirations who are attending university, to those who are unclear, unsure and demotivated about their future prospects. The level of support varies from client to client and the case studies give a flavour of the low to high needs reflected in the client group.

Providing this support to NEETs makes strong economic and social sense, as illustrated by our work with Patrick, our first client to be housed. He was unemployed at the time of signing up to the project and the pressure of living in overcrowded accommodation was having a serious impact on him and his family. His mother said that he spent most of his time in the bedroom and recalls 'at one point he would just wait for his giro and disappear for the weekend. I thought that he would turn to drugs. He was really depressed, everyone was worried about him, we couldn't see a way out'. His caseworker found a job vacancy for a Maintenance Administrator at a private firm, helped Patrick to apply and mentored him in his first few months in the role and then housed him via the project. He's now been with the company for almost a year. His mother reports: 'he is so different now, back to his old self'.

¹¹ CLG definition meaning supported by the scheme but not yet ready or don't want to be housed by the project.

The costs of not engaging young people like Patrick can be enormous. Research for the Department for Education and Skills in 2002 looked at the public finance and resource costs associated per NEET person. In 2010 these figures were updated for the Audit Commission. This report estimates the impact on public finances per 'NEET' person at **£99,590** over a lifetime. The report calculates an additional resource cost of **£264,303 per NEET**, which accounts for the estimated loss of earnings, low skills base, criminal careers, social housing, impacts of smoking/ alcohol/ drug misuse, premature death and intergenerational impacts.¹²

Initial indicators from the InComE project data identifies a 90% reduction rate for clients who were defined as 'NEETs' and are now housed and in work, training or studying. For clients in Control Group 1 (receiving training and employment support but not yet ready or wanting to be housed via the project) the reduction rate has been 68% (see table 4 below). For some, the prospect of being housed by the project has been enough to motivate them to enrol at college or find a job.

Table 4 Reduction of NEETS through intervention of the InComE project

Client group	No. of NEET clients when they joined the project	No. of NEET clients at present (20/09/2010)	Reduction in percentage of the no. of NEET clients since joined
Housed Clients	20	2*	-90%
Ready to be housed Clients	2	0	-100%
Control Group one Clients	19	6	-68%

*The project is working intensively to get these 2 clients back into employment or terminate their housing and support them to return home or into private accommodation.

If we calculate the public finance cost of NEETs against the number of clients identified as NEET when joining the scheme but now no longer in that category **we can demonstrate a saving of £12m** (projected saving over the

¹² Page 17, "Estimating the Life-time Cost of NEET: 16-18 year olds not in education, employment or training," Christine Godfrey et al, Department of Social Policy, Social work and Health sciences, University of York", 2010. While the report defines NEETs as aged 16-18, it incorporates costs associated in the medium and longer term life span per capita.

lifetime costs of these clients using government figures, see p11) by using the unit cost as a proxy:

33 clients no longer 'NEET' due to project intervention x £363,893 per person of public finance and resource cost = £12,008,469¹³.

Whilst this figure represents a broad whole life cost per capita, it helps to demonstrate that up-front intervention at a young age saves huge costs further down the line. Early intervention with NEETs is by far the cheapest option for public finances and resources in both the medium and long term.

Section 5

Cutting the public finance costs of the local education, NHS and police bills by reducing overcrowding

Analysing actual overcrowded households in west London, our project can demonstrate real costable reductions to the local education budget, NHS and front line police. There are some costs such as lost employment productivity and stalled career development due to overcrowding that are harder to quantify. But the scope of this section looks at robust data sources and extrapolates the savings achieved by assisting young people out of an overcrowded council or housing association home.

Table 4: **Breakdown of overcrowded and severely overcrowded client households prior to being ready for housing/housed by the project**

	H&F	RBKC	Hounslow	Brent	Harrow	Hillingdon	Ealing
Severely overcrowded	4	2	0	2	0	0	1
Overcrowded	13	8	7	1	2	1	10

Ten months in to the project, early findings show that 60% of council client households are now no longer overcrowded because of the project's intervention. We will report on the full local authority picture and housing association referrals by the next report deadline of March 2011.

¹³ Note this is based on 2008 figures, so we would anticipate the savings would now be higher. We have taken the mid-point figure for NEETs as the 2008 report for the Audit Commission identifies a low estimate and a high estimate of costs for the NEET population (page 18 of report).

Improvement in educational achievement

The National Child Development study has linked overcrowding to poor health and an increased number of school days missed. Typical problems are: sharing a room with older/younger siblings that go to sleep at different times, leading to sleeplessness and poor classroom performance; a lack of quiet private space to do homework; arguments caused by forced sharing of bedrooms¹⁴.

The situation with Stephanie's family shows how the project can prevent this link from causing too much harm to younger siblings. Stephanie slept on the sofa in her family home but in August this year the project supported her into her own flat. Since moving out Stephanie's household is no longer overcrowded and her younger siblings now have their own space to study. This is particularly important for Stephanie's 11 year old brother as he started senior school in September. Stephanie's mother describes a definite decrease in the strain on the household since Stephanie left.

The difference in educational attainment (in terms of GCSEs, A levels and degrees) between children living in overcrowded housing and those not living in these conditions in terms of loss of future potential earnings equates to £3083 per dwelling in the total housing stock¹⁵.

The project is soon to reach its current capacity at 60 clients housed, with a current overcrowding reduction rate of 60% we can calculate that £110,988 of forecast earnings will not be lost to younger siblings in overcrowded homes.

Reductions in costs for the NHS

The caseworkers on our project complete a family questionnaire with one or both of the parents before we agree to house the adult non-dependent. The stress, depression and anxiety that comes from a family living in cramped conditions, is very often raised by the parents. When we ask 'what would make you happy?' the answer is usually: 'space'.

Poor housing conditions have been proved to lead to more GP consultations, associated treatments, hospital in-days and hospital out-day referrals. The Human City Institute estimates that poor housing conditions specifically

¹⁴ Social Impact of Poor Housing, Danny Friedman, ECOTEC, 2010

¹⁵ Counting Costs: The Economic and Social Impact of Reduced Mobility in Social Housing' Kevin Gulliver, Human City Institute and Circle Anglia Housing Association, July 2010

related to overcrowding, costs the NHS annually £172 per overcrowded dwelling¹⁶.

Using this unit cost as a proxy to demonstrate the savings the project will make reductions to the local NHS in west London:

£172 x 60 housed clients @ 60% reduction in overcrowded family homes =
£6,192 reduction in local NHS costs per year of the project.

Reduction in tangible crime costs

Hussein grew up on the White City estate in west London in a severely overcrowded home. He shared the home with his parents, one sister, two brothers and his brother's wife and child in a four bedroom property. He said he had to queue for the bathroom, queue for the internet, that it was easier to go out on the streets. Two of the other adults in the house were unemployed, one of them for five years. Hussein was enrolled at college but he said there was nowhere to study properly at home. When he first joined the scheme he reported he 'would like to be very independent and not rely on anyone but I need the right advice'. In an overcrowded home, Hussein spent more time out on the streets as somewhere to have space. In an area where crime is high and gang affiliation strong, Hussein was a risk of becoming involved in criminal activities. He was our second client to be housed, and he now lives in his own flat, in the same borough but not the same neighbourhood and studies a construction trade at the College of North West London. Hussein has since been interviewed by Shepherds Bush Housing Association's maintenance contractors for a work placement.

There are about four clients on the project who told their project caseworkers about low level criminal records (street fighting, anti-social behaviour and minor drug crimes) prior to being housed. Visits by the caseworkers check that the tenancy is being properly sustained, detailed support plans are written and regular checks with host housing associations pick up quickly on any issues. To date no continuation of criminal activities have been reported and the clients are all in training or work.

A Joseph Rowntree Foundation study identified poor housing and disadvantaged neighbourhoods as risk factors signalling future criminal and anti-social behaviour. Friedman in his recent report '*Social Impact of Poor*

¹⁶ Page 18, Counting Costs: The Economic and Social Impact of Reduced Mobility in Social Housing' Kevin Gulliver, Human City Institute and Circle Anglia Housing Association, July 2010

Housing' (2010)¹⁷ has reviewed the evidence and found that police response to crime in neighbourhoods of poor housing equates to a bill of £200m per year spread across all unfit dwellings in England. With overcrowding representing one third of all housing assessed as inadequate this has been calculated as a single unit cost of Criminal Justice System costs related to overcrowding as £124 per dwelling¹⁸ per year.

With the InComE project achieving a reduction in overcrowding of 60% to date, a strong economic case can be made to show that when the project reaches its capacity of 60 clients it will save the police a bill of £4,464 per annum.

Note: the unit cost of £124 per dwelling per year is exclusively related to the costs of police response to crime. It excludes; costs of court, prison and probation service, victim compensation, physical and health costs resulting from the trauma of being a victim; and capital and revenue costs associated with estate security and crime prevention¹⁹.

Section 6

Equal Opportunities Data – reversing the national trend

One remarkable aspect of the project is that the intervention provided to the clients on the scheme is starting to reverse national unemployment trends for young black and mixed ethnic people. Data analysed from the Labour Force Survey in January 2010 revealed that almost half of black people aged 16–24 are now unemployed²⁰. The housing benefit and JSA costs associated with this significant spike in unemployment can be very significant. Yet, the intervention and support provided by our scheme illustrates that young black and mixed ethnic men and women are successfully completing training courses, degrees and maintaining work. The up-front costs in tailored support pays long-term dividends for the taxpayer.

Clients such as Ashley and Jason are both young black men who demonstrate the value for money argument that tailored training, employment and housing intervention is delivering. We are supporting both Ashley and Jason

¹⁷ Social Impact of Poor Housing, Danny Friedman, ECOTEC, 2010

¹⁸ Counting Costs: The Economic and Social Impact of Reduced Mobility in Social Housing' Kevin Gulliver, Human City Institute and Circle Anglia Housing Association, July 2010

¹⁹ Page 7, Social Impact of Poor Housing, Danny Friedman, ECOTEC, 2010

²⁰ <http://www.ippr.org.uk/pressreleases/?id=3846>

to invest in gas engineering and electrical installation respectively, ensuring that they will have a trade for life. The trade body for plumbers states that the average self-employed plumber should expect to earn approximately £30,000 – £50,000 a year²¹. Both Ashley and Jason will have earning capacity that will mean they can afford a mortgage in the future, pay bills, support a family and avoid the benefits trap of short term low skilled jobs. Last month they started paid apprenticeships with Shepherds Bush Housing Association's maintenance contractor.

The percentage of clients who the project has housed and are employed and come from a black, mixed ethnic or Asian background is 54%. For our clients who are studying or working and waiting to view properties, the percentage of black, mixed ethnic and Asian is 60%.

Section 7

Conclusions

Total savings achieved by the project based on:

1. Table 1: actual savings to date based on 38 housed clients over a 10 month period = **£13.5m**
1. Table 2: projected savings based on 60 housed clients, project target end of year 1 = **£21.m**
2. Table 3: projected savings based on the project being rolled out to 100 clients = **£35m**

Table 1: actual savings to date based on 38 housed clients, savings at 10 months

Category of actual public finance saving	Amount of public finance saved
HCA grant	£1,120,000.
Welfare benefits (HB and JSA)	£386,450
Costs associated with NEETs* over their lifetime	£12,008,469
Local NHS	£3922
Local Police	£2827
Total savings	£13,521,668

*33 clients out of 41 no longer NEET, 80% reduction

²¹ <http://plumbing.train4tradeskills.com/index.html>

Projected costs for younger siblings based on 38 clients not being supported out of overcrowded homes

Projection of forecast earnings lost to younger siblings*	£70,292
Projected tax revenue missed from the loss of earnings of younger siblings	£23,446
Total	£93,738

*younger children in overcrowded homes are projected to lose £3083 in future earnings per home based on educational underachievement due to overcrowding (*Counting the Costs*, Human City Institute)

Table 2: projected savings based on 60 housed clients, project target end of year 1

Category of public finance saving	Amount of public finance saved
HCA grant	£2,880,000
Welfare benefits (HB and JSA)	£732,221
Costs associated with NEETs* over their lifetime	£17,466,864
Local NHS	£6,192
Local Police	£4,464
Total savings achieved	£21,089,741

*based on 60 clients at an 80% reduction rate

Projected costs for younger siblings based on 60 clients not being supported out of overcrowded homes

Projection of forecast earnings lost to younger siblings*	£110,988
Projected tax revenue missed from the loss of earnings of younger siblings	£37,020
Total	£148,008

*younger children in overcrowded homes are projected to lose £3083 in future earnings per home based on educational underachievement due to overcrowding (*Counting the Costs*, Human City Institute)

Table 3: projected savings based on 100 housed clients if the project was to be rolled out to more clients

Category of public finance saving	Amount of public finance saved
HCA grant	£4,800,000
Welfare benefits (HB and JSA)	£1,220,368
Costs associated with NEETs* over	£29,111,440

their lifetime	
Local NHS	£10,320
Local Police	£7440
Total savings achieved	£35,149,568

*based on 100 clients at an 80% reduction rate

Projected costs for younger siblings based on 100 clients not being supported out of overcrowded homes

Projection of forecast earnings lost to younger siblings*	£184,980
Projected tax revenue missed from the loss of earnings of younger siblings	£61,170
Total	£246,150

*younger children in overcrowded homes are projected to lose £3083 in future earnings per home based on educational underachievement due to overcrowding (*Counting the Costs*, Human City Institute)

The model for this project is robust because it simultaneously reduces overcrowding whilst increasing the skills of individual clients, making them less reliant on social housing in the future. As more clients are supported into career-based employment, payroll tax revenues are also increased. If this project was rolled out across London it would have significant impact on reducing costs to tax payers as well as helping to decrease the welfare benefit bill.