



NORTH NORTHAMPTONSHIRE SHADOW AUTHORITY

SHADOW EXECUTIVE COMMITTEE MEETING

3 February 2021

Report Title	North Northamptonshire Housing Allocation Scheme
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List of Appendices

Appendix A - Draft North Northamptonshire Housing Allocation Scheme

Appendix B - Detailed consultation analysis

1. Purpose of Report

- 1.1. To seek Committee approval of the draft North Northamptonshire Housing Allocation Scheme to provide a common framework for the allocation of social rented homes to households across North Northamptonshire from April 2021.

2. Executive Summary

- 2.1 The report sets out a final draft housing allocation scheme for North Northamptonshire following the conclusion of a six-week consultation with service users and stakeholders. It provides a summary of the feedback received from the consultation and explains how this has influenced the final draft scheme. The report also provides an update on the wider housing allocations project and plans for implementation of the draft scheme, subject to approval.

3. Recommendations

- 3.1 It is recommended that the Shadow Executive Committee:
- a) Approves the final draft housing allocation scheme for North Northamptonshire contained in Appendix A to this report.
 - b) Supports the aim to launch the new scheme on vesting day, 1 April 2021

Reasons for Recommendation

- 3.2 The launch of a common housing allocation scheme for North Northamptonshire on vesting day represents a first step in transforming housing services to the benefit of all local residents who are seeking social housing.
- 3.3 As well as aligning four existing housing allocation schemes into one common scheme and creating equality of opportunity to access social housing across North Northamptonshire, the recommended course of action brings with it cost savings and wider benefits to North Northamptonshire Council and its customers (see section 6.1 for further detail).

4. Report Background

- 4.1 Members will be aware that all local housing authorities are required by law to have a scheme for determining priorities and procedures when allocating social housing, including council housing and housing association properties to rent. The four sovereign housing authorities across North Northamptonshire have all operated Choice Based Lettings (CBL) schemes for some time and residents are therefore familiar with this model of housing allocation whereby applicants place 'bids' (or expressions of interest) on advertised properties.
- 4.2 Whilst the Local Government (Structural Changes) (General) (Amendment) Regulations 2018 provide a period of two years for the housing allocation schemes inherited from predecessor councils to be revised and harmonised across the new unitary authority, on 29 October 2020 the Shadow Executive Committee supported the aim to launch a new North Northamptonshire housing allocation scheme on vesting day, 1 April 2021, to supersede the existing schemes covering Corby, East Northamptonshire, Kettering and Wellingborough.
- 4.3 A draft North Northamptonshire housing allocation scheme applicable to existing housing applicants, new applicants and existing social housing tenants in North Northamptonshire who wish to transfer, was developed by a project group of officers from the four local housing authorities in North Northamptonshire. This is provided at Appendix A and proposes to retain the CBL model of allocation. The draft scheme is largely based on the existing Keyways scheme operated by the councils of Corby, Kettering and Wellingborough who share an IT system but do have some minor differences between their existing allocation policies which therefore require alignment.
- 4.4 To ensure readiness for vesting day, the Shadow Executive on 29 October 2020 approved the launch of a six-week consultation in respect of the draft housing allocation scheme for North Northamptonshire. The consultation subsequently ran from 4 November to 15 December 2020. A copy of the report taken to Shadow Executive on 29 October 2020 to seek approval to launch a consultation is provided [here](#).
- 4.5 The consultation has since concluded, and responses have been thoroughly analysed. The feedback that was received is summarised in section 6.4 alongside detail including reasons as to whether or not amendments have been made to the final draft scheme as a result.

4.6 This report proposes the final draft housing allocation scheme for adoption at Appendix A.

5. Issues and Choices

5.1 The Shadow Executive Committee is asked to provide its support to the recommendation (at 3.1 above) to adopt the final draft housing allocation scheme for North Northamptonshire in order that the project team can continue with its aim to launch the scheme on vesting day, 1 April 2021 and in order that delivery of the wider project is not compromised.

5.2 Details of the housing allocation scheme proposed for approval

5.2.1 The previous report to Shadow Executive Committee provided detail in section 5.2 as to how the draft housing allocation scheme for North Northamptonshire had been developed, essentially via a process of mapping current allocation schemes, examining housing supply and demand data and having regard to current strategic housing priorities across North Northamptonshire. It also provided a brief overview of the headline aspects of the draft scheme, which are examined in more detail in section 6.4 of this report further to the conclusion of a public consultation.

5.2.2 The draft housing allocation scheme sets out the proposed rules regarding:

- Who would qualify for social housing in North Northamptonshire
- Who would receive priority for social housing in North Northamptonshire
- How the new Council would allocate social housing and who could be considered for what type and size of property
- How applications from those in the greatest housing need, including people who are homeless, will be managed

5.2.3 The draft scheme at Appendix A contains full details of these rules but the headline proposals contained within the draft scheme are as follows:

- Some applicants will not qualify to access the scheme including:
 - Those with no housing need (some exceptions apply for example applicants eligible for sheltered accommodation)
 - Some homeowners
 - Those without a local connection to North Northamptonshire
 - Persons who have behaved in an unacceptable way
- A local connection can be established by virtue of two years' residency, family connections and employment. Special circumstances also apply for example in cases relating to domestic abuse and armed forces personnel.
- The scheme proposes an opportunity for free movement across North Northamptonshire in order that applicants can consider housing solutions across the wider geographical area in order to meet their needs however it is recognised that most applicants will likely remain keen to secure housing solutions within their existing communities and support networks. There remains a mechanism to exempt some properties or developments from this rule for example some village properties and new build schemes.

- The proposed banding criteria reflect the statutory reasonable preference categories and also local priorities which are based on housing supply and demand data across North Northamptonshire
- Five priority bands A, B, C, D and E are proposed which contain a list of criteria that satisfies each priority band. Applicants that are homeless or threatened with homelessness span Bands A – D depending on the type of statutory homeless duty owed, and other factors pertaining to the circumstances of their individual case.
- The detailed priority banding criteria are provided in Appendix A but to provide a summary of the proposed tiers of housing need:
 - Applicants awarded a Band A will receive the highest priority for rehousing and this band includes households that are owed the main statutory homeless duty, those with a severe medical need to move and those at serious risk of harm.
 - Band B priority includes applicants that are owed a homeless prevention or relief duty and that are vulnerable or have dependent children where they appear to be homeless through no fault of their own. This priority band also includes those with an urgent medical need to move and those that are overcrowded requiring additional bedrooms.
 - Band C represents those applicants with lower level housing needs and includes applicants with a less urgent need to move on medical grounds. It also includes those homeless applicants owed a prevention or relief duty who are not deemed to have worsened their own circumstances but who are not regarded as vulnerable.
 - Band D includes a limited number of applicants who must be provided a reasonable preference as homeless households but who have been deemed to have deliberately worsened their circumstances or found to be intentionally homeless. It also includes applicants who are regarded to have adequate accommodation that is shared with others but who would benefit from independent accommodation.
 - Band E includes two specific groups of applicants with no housing need but who are permitted to qualify for the scheme nonetheless, namely those seeking sheltered accommodation and those with a local connection to a rural exceptions site or section 106 site where allocation requirements are contained within legal planning agreements.
- The priority banding criteria also considers the likely wider strategic objectives of North Northamptonshire and its partners considering the role of housing in meeting health and social care outcomes. Examples of this are a high priority proposed to those requiring suitable accommodation to facilitate hospital discharge (in Band A), and a high priority for those ready to move on from supported housing or local authority care (in Bands A and B). The scheme proposes that statutory homeless applicants, and other applicants in Band A with an emergency housing need, will be provided with a suitable offer of accommodation determined by a system generated 'autobid' function. This will enable their critical housing need to be resolved at the earliest opportunity. Safeguards will be in place to ensure that any

offer of accommodation is suitable in line with statutory suitability regulations.

- It is proposed that other categories of applicants who refuse two suitable offers of accommodation within a 12-month period will have their applications suspended and be unable to participate in the scheme for 12 months.
- The draft scheme also proposes specific preference rules relating to the allocation of specialist property types in order to make best use of social housing stock to meet the needs of the existing applicant profile. Such rules apply to family accommodation with gardens (reserved for families with dependent children), properties offering disabled adaptations (preference to applicants with an evidenced medical need for such adaptations) and general needs bungalows (preference to those aged at least 60 years).

5.3 Options considered

- 5.3.1 The alternative option would be to utilise the two-year period detailed in 4.2 to revise and harmonise the existing allocation schemes into a North Northamptonshire scheme prior to April 2023 and to continue with the four housing allocation schemes currently in operation in the interim. On the basis that local circumstances in North Northamptonshire make achieving a harmonised and common scheme feasible, and due to an evidence-based desire to ensure that residents of North Northamptonshire are subject to the same rules governing the allocation of social housing, the project team committed to aiming for the delivery of a new common scheme for Day One.
- 5.3.2 The project team with their experience of operating frontline housing allocation teams and developing and delivering new housing allocation schemes across North Northamptonshire believe that continuing with four different schemes and sets of rules after April 2021 would lead to confusion and result in different levels of support and opportunity for residents depending on their current area of residence. A common scheme for Day One would mean increased simplicity for customers and ensure that applicants with the same housing circumstances and level of need would be provided the same level of assistance and opportunity to resolve their housing difficulty irrespective of their current area of local connection.
- 5.3.3 Alongside the project work to create the new draft housing allocation scheme for North Northamptonshire, are two other related projects:
- The housing allocation IT system project (see section 6.1) which consists of IT amendments in line with the draft policy and a system upgrade
 - The housing allocation processes project (see 5.3.4 below)
- 5.3.4 A **housing allocation processes project** is underway with the aim of aligning back-office processes, letter templates and operational practices that will underpin delivery of the new scheme in order to ensure clarity and consistency across local offices in delivery of the draft scheme from Day 1. The scope of this project includes staff training to ensure that existing teams are fully prepared and equipped to implement the draft scheme from Day 1, to improve

customer service and minimise the risk of issues that might otherwise be associated with the implementation of a new scheme and amended IT system. The scope of this project also includes alignment of existing Registered Provider nominations agreements to bring consistency across North Northamptonshire in the joint working arrangements with housing associations who have social housing stock across North Northamptonshire.

6. Implications (including financial implications)

6.1 Resources and Financial

6.1.1 **The housing allocation IT system project:** At Shadow Executive Committee on 29th October 2020, Members were briefed that the North Northamptonshire housing allocation scheme would be delivered by making changes to, and upgrading, the existing Keyways IT system provided by Civica. Relevant approval for the accompanying IT project which supports delivery of the new scheme has been obtained. The amended and upgraded IT system, if delivered in April 2021 subject to approval of the new draft scheme, will reduce costs for North Northamptonshire Council and achieve significant benefits for customers. It will also enable the launch of the new North Northamptonshire housing allocations website to take place with the creation of the new Council.

6.1.2 The accompanying IT system policy changes and upgrade are the only components of the draft North Northamptonshire housing allocation scheme project that have associated costs, specifically a revenue cost of £87,000 for the licence and implementation costs of an amended and upgraded IT system (consisting of policy changes £19,925 and system upgrade £67,075).

6.1.3 Annual support and maintenance costs of the upgraded IT system will be £20,700 representing a saving of £16,120 per annum on existing annual support costs which will be realised from procuring one new contract with Civica to replace the four existing contracts. These savings will be reflected in the new council's budget when they are realised.

6.1.4 A separate report has been taken through the necessary Future Northants internal governance processes and the implementation costs are being funded through the Future Northants Programme budget.

6.1.5 The current version of the Civica allocations system is seven years old and a new system will inevitably offer enhanced capability and process improvements for officers working on housing applications and allocations. More importantly, however, it will enable North Northamptonshire Council to be more proactive in letting properties and securing housing solutions for residents in need and offer customers a more modern, accessible and streamlined experience with increased functionality that will help them to help themselves. Specific improvements will include:

- A more modern and accessible website that is easier for customers to navigate and use.
- A website that is readily compatible with a variety of mobile and tablet devices.

- More efficient processing and secure handling of applications leading to quicker decisions for customers
- Better adverts for individual properties with improved layouts, graphics and tailored information.
- Information on waiting times for specific property types that can be tailored to customers' individual circumstances.
- More opportunities for self-service as customers will be able to upload evidence in support of their applications and have the facility to reset forgotten login details.

6.1.6 There are no implications at this stage in relation to staff resources

6.2 Legal

6.2.1 The adoption of a housing allocation scheme for North Northamptonshire is a legal requirement and is dealt with in Section 166A of the Housing Act 1996, as amended (the Act). Section 4.2 of this report provides detail on the Local Government (Structural Changes) (General) (Amendment) Regulations 2018 which provide a two-year period in which to align existing allocation schemes in the context of Local Government Reform.

6.2.2 The previous report taken to Shadow Executive Committee on 29 October 2020 describes at paragraphs 6.2.2 – 6.2.4 how Sections 166A and 168(3) of the Act have been fulfilled in the development of the draft housing allocation scheme and the subsequent consultation, which both carry legal requirements.

6.2.3 The draft scheme has been developed to be compatible with other relevant legislation, regulations and guidance listed in section 3 of appendix A including full compliance with the Armed Forces Covenant.

6.2.4 The legal team at District Law reviewed the draft scheme in September 2020 prior to consultation and were satisfied in relation to statutory compliance. Any changes made since this date following the consultation feedback are minor and do not affect the fundamental legality of the proposed scheme.

6.3 Risk

6.3.1 There is a legal requirement to have in place an allocation scheme for determining priorities, and the procedure to be followed, in allocating social Housing. The Local Government (Structural Changes) (General) (Amendment) Regulations 2018 enable a North Northamptonshire scheme to be developed post vesting day so there remains no risk of legal challenge should members decide to continue operating the existing four allocation schemes from vesting day. However, the risks that are likely to arise by not progressing this transformational work for Day 1 pertain mainly to operational inconsistencies as detailed in 5.3.2.

6.3.2 Rather than any failure to approve the proposed scheme presenting any significant risks to North Northamptonshire Council, the transformational nature of this proposal represents an opportunity to deliver improved housing services to benefit customers of the new Council.

6.4 Consultation

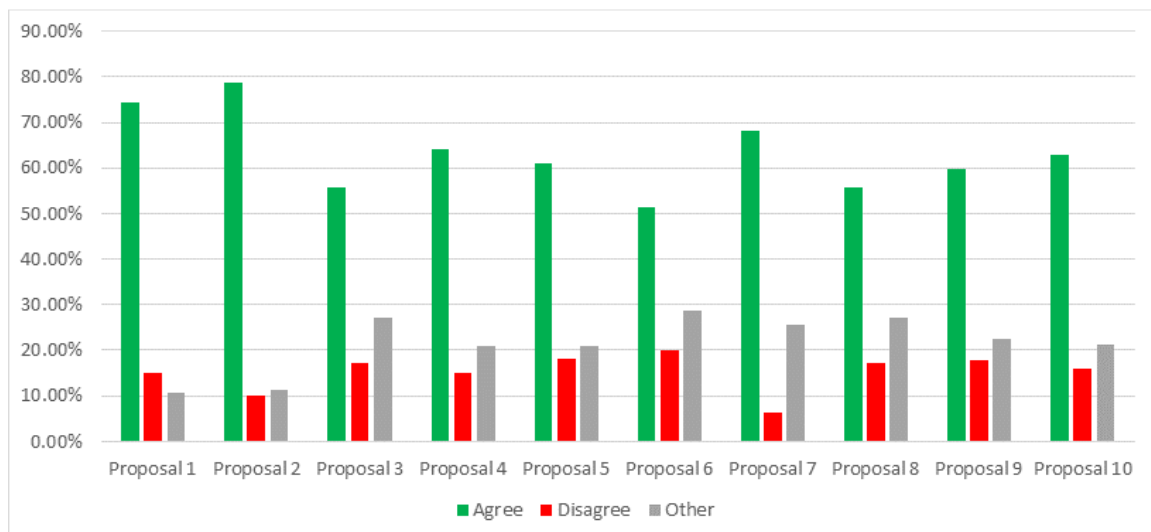
- 6.4.1 A six-week consultation in respect of the draft North Northamptonshire housing allocation scheme was launched on 4 November 2020 and closed on 15 December 2020. An online survey was made available on the Future Northants Citizen Space. Consultation survey responses were received online and via post, hard copy, telephone and email. This evidences the accessibility of the wider consultation methods that were provided.
- 6.4.2 The consultation was promoted via press release, social media announcements, website articles (on sovereign council websites and the existing Keyways and Homes Direct websites) and staff / member briefings. More importantly, all existing applicants were contacted directly via email (where provided) or letter to notify them of the consultation opportunity and the relevance of the proposed changes to the general allocation of social housing in the future. Applicants with pending and suspended (non-qualifying) applications were also contacted so as not to restrict the communication regarding the consultation only to those with a currently active application which would be likely to yield more positive feedback in terms of their experience to date. Direct communication was also provided to all housing association (Registered Provider) partners, other statutory and voluntary sector partners with an interest in housing and homelessness, and those individuals registered with NCC's Resident's Panel and Consultation Registers. Kettering and Corby Borough Councils also promoted the consultation opportunity and draft scheme detail to existing council tenants via their Tenant's Forum and Tenant's Voice Group.
- 6.4.3 The consultation presented ten key proposals and invited respondents to say whether or not they strongly agreed, tended to agree, neither agreed nor disagreed, tended to disagree or strongly disagreed with the draft proposals. It also provided sufficient scope for respondents to provide free text feedback on each proposal and on the wider draft scheme.
- 6.4.4 The ten key proposal areas on which feedback was specifically sought were:
1. The proposed inclusion of certain **non-qualifying categories** (restricting access to the housing register)
 2. The proposed **local connection criteria**
 3. The proposed **'free movement'** across North Northants (some exceptions apply)
 4. The proposed **priority banding criteria**
 5. The proposal to disallow access to those applicants with **no housing need** (limited exceptions apply)
 6. The proposed approach to allocating **village properties**
 7. The proposed **property eligibility rules** – who can be considered for what property type
 8. The proposed approach to allocating **disabled adapted properties**
 9. The proposal to **remove choice for homeless and emergency need cases**
 10. The proposed **sanctions for property refusals**
- 6.4.5 The consultation received 238 responses in total, consisting of 143 fully completed surveys and 95 part completed surveys. Responses that make up

the part-completed surveys have been included in the consultation analysis in the sections that follow. More detailed data on the consultation responses to date and demographic information pertaining to respondents is included in Appendix B with headlines being provided below.

6.4.6 Of the 238 respondents, only 8% were responding on behalf of an organisation with the remaining 92% being individuals with an interest in the proposals. Of those individuals 41% were existing service users of the sovereign council allocation schemes and there was a good representation of individuals across all four local authority areas

6.4.7 Tables 7–11 in Appendix B show the breakdown of respondents by demographic factors and illustrate a representative sample of our service users in line with the data presented in the Equality Impact Assessment which is reassuring and indicates that the consultation was widely accessible to all service users based on the protected characteristics.

6.4.8 Overall, across the ten proposals, the consultation returned a rate of 63% of respondents agreeing or strongly agreeing with the proposals, 15% disagreeing or strongly disagreeing, and the remaining 22% of responses neither agreeing nor disagreeing or not knowing. Across all ten key proposal areas, more respondents agreed with each draft proposal than disagreed with them as illustrated by Figure 1 in Appendix B also provided below:



6.4.9 Table 1 and Figure 1 in Appendix B shows variation in agreement and disagreement between the different proposals. Proposals 1, 2 and 7 received the highest proportion of support and lowest proportion of disagreement telling us that respondents appear to feel most strongly about, and largely agree with the proposed non qualifying categories of applicant who would be unable to access the North Northamptonshire housing register, the proposed local connection qualifying criteria and proposals regarding who is eligible for what property type and size.

6.4.10 Proposal 6 (relating to village properties / connection) led to the highest rate of disagreement and lowest rate of agreement, but still only 20% of respondents either disagreed or strongly disagreed with these specific proposals. Proposal 5 (relating to the non-qualification of applicants with no housing need) led to

the second highest rates of disagreement at 18% and generated lots of free text comments examined in more detail in section 6.4.12 overleaf.

6.4.11 As the proposal that attracted the lowest rates of agreement and highest rates of disagreement, the feedback on proposal 6 was particularly closely examined. This related to the proposal to allocate village properties according to the wider scheme i.e. based primarily on housing need (priority band) irrespective of the village location, albeit the draft scheme contains mechanisms to enable village local connection preferences to be applied in accordance with planning agreements and/or when a local lettings policy is adopted. The table below provides some examples of respondent's comments in support of, and against, this proposal:

Strongly agree / Tend to agree: 51.2%	Strongly disagree / Tend to disagree: 20.1%
<i>Why should villages be exclusive to the families that already live there?</i>	<i>I think that if you have been born and brought up in a particular village or town and still wish to remain there, you should be given priority. In the grand scheme of things, the percentage of these types of applications will be relatively few</i>
<i>The need to be housed has to be the overriding factor.</i>	<i>A connection to the village should be a high factor in decision making, i.e. if someone is in a lower band of need, they should get priority for a village property if there is a legitimate connection</i>
<i>Again, opens more opportunities to new communities</i>	<i>Village Communities need social Housing for their Children particularly if they are working in the Agricultural sector</i>
<i>If somebody needs a house, then they should take priority over someone that just wants to live in a village but can't afford to buy or private rent there.</i>	<i>The lack of facilities and transport in most village locations would be alien to someone used to town and city life. In my experience like a square peg in a round hole!</i>
<i>I think you have to do this but it is tricky as public transport links are not great and some people may have a specific need to be close to family in a village for example to help with child care or medical needs. I think this needs to be taken into consideration also.</i>	<i>If a person has always lived in a town/village and is waiting for a property to arise in that specific place and then a person from another town 5/10 miles away gets it, I do not find this fair. When a person that has a lot of extended family living in a town, they should get priority over someone living in a different town.</i>
<i>"It's a matter of choice. There are people who choose to live quietly in villages provided there are social amenities and shops for their children and the houses will be cheaper. Why not?"</i>	<i>What needs to be taken into account is, age of person, and what property they are giving up. Also, if they are ill and need family who live in the village for help and to look after.</i>

<i>More options should help with less waiting time on the register to find a home.</i>	<i>Many people have been moved to [village] with no local connection and don't even want to be here then people like me don't get a look in</i>
<i>I very strongly agree with this. Say a 4 bedroom (which I need) becomes vacant in [village], I have a chance of not being allocated it just because I have no connections there its stupid</i>	<i>We believe elderly, existing village residents should receive higher priority if they find themselves in need of a bungalow due to mobility/health issues. They should be able to remain in the community.</i>
<i>There should be free access for all and no exclusions.</i>	<i>Village communities are very important and can only be sustained by allowing people to come into the area who have a desire to live there - i.e. those with a local connection. 'Outsiders' tend to treat the properties as a stepping stone and make no effort to keep them well maintained or make any effort to integrate into local society.</i>
<i>We agree to this approach, prioritising what is most important.</i>	<i>Allocating any village housing to those from outside the village does not engender a sense of community or enhance family life</i>
<i>Inescapable, given the shortage of Social Housing.</i>	<i>This is very unfair! Small towns and villages should be different. People who already live there should get priority! Unless they are nurse, Dr, fireman, teacher."</i>
<i>Nobody has a specific right to live anywhere</i>	<i>It is important for the sustainability of any village and to ensure that families can live in close proximity; therefore, where the local connection is close family, they should receive a higher priority. There may be other examples of local need, such as education, employment, caring and health that may mean the local connection is important. NNC should, as a matter of urgency, maintain a complete list of co-terminus villages and Local Lettings Policies for each parish."</i>

6.4.12 Some of the concerns from respondents who disagreed with proposal 6 can be addressed by the draft scheme which contains sufficient flexibility to enable the specific circumstances of a village to be taken into account to propose and adopt a local lettings policy. Section 7.10 of the draft scheme at Appendix A deals with this and states *"For existing communities, any local lettings policy will be drawn up in consultation with existing tenants and residents, and will have regard to housing management considerations such as the social mix of tenants, density, age range, vulnerability of tenants, for example, because of insufficient facilities for vulnerable people, as well as community stability."* It is envisaged that data on the social housing stock profile in a particular village,

alongside planning agreements, housing demand data and the views of residents and parish councils can be considered on a case by case basis rather than adopting a blanket policy to allow or disallow village connection to be adopted as an overriding factor in allocation decisions. Respondents concerns about the lack of facilities and transport links causing a potential issue for some applicants are unlikely to be an issue in practice because applicants will maintain choice by enlarge, and where this is removed such suitability considerations regarding health, education and other support networks will be a key factor in making allocations.

6.4.13 It is important to point out that for every proposal, the consultation attracted more positive support than comments disagreeing with proposals, but particular focus was given to the latter to understand respondent's concerns and to see if any action could be taken to mitigate those.

6.4.14 Officers have carefully considered every comment received from the consultation. Many relate to very specific sets of circumstances or raise concerns that the draft scheme detail actually addresses, but the information in the table below summarises some of the more common and general comments received alongside commitments to make changes and/or take action in relation to the draft scheme and its delivery. Whilst some comments pertained to the detail of the draft policy itself, many others pertained more to the accompanying processes, the future housing strategy of North Northamptonshire and some to central government policy (e.g. right to buy, insecurity of tenure in the privately rented sector and increasing the supply of new affordable homes) which are issues that cannot be addressed via the allocation scheme but which are useful as North Northamptonshire Council develops its strategic housing vision.

Proposal	Theme / comment	Response	Action
5	<p>Non-qualifying those with no housing need, particularly those who privately rent</p> <p>Those that disagreed with this proposal felt that everyone should have a chance to access the waiting list. Specific reasons related largely to those with low earnings who cannot access home ownership thus their viable option is to privately rent which is expensive and</p>	<p>The draft scheme is framed to provide everyone in need the opportunity to move to more suitable housing. It has been proposed not to allow those with no housing need to qualify because:</p> <p>a) Demand is high from those in housing need</p> <p>b) Staff resources would be spent administering applications for those with very little or no prospect of being housed</p> <p>c) Allowing everyone to access the list irrespective of housing need would also serve to create false hope when data tells us that such customers have very little prospect of being housed. The proposed approach aims to be open and transparent regarding opportunity at application stage in order that applicants explore more viable housing solutions instead</p> <p>The difficulties of raising a deposit</p>	<p>We will commit to continuing to review the lettings and local housing market data annually to monitor the impact of the draft scheme, and continue to work with our RP partners to develop and deliver low cost home ownership (intermediate market) products alongside the delivery of more affordable homes to rent. We will ensure that this feedback is provided to strategic housing</p>

	<p>compromises residents' ability to save for a deposit to access home ownership. Respondents also spoke about the insecurity of private tenancies</p>	<p>whilst funding private rent levels is recognised and symptomatic of the wider housing market. Unfortunately, whilst the difficulties are recognised, the private rented sector plays an important role in meeting housing need including for homeless households. There are a high number of applicants in significant need of accommodation who must legally be provided priority access to social housing and for whom such affordable rent levels are their only viable option. The Council would like to provide private renters with access to social housing for the reasons provided by these respondents, but unless there is a housing need, the demand / supply data tells us that this cohort of applicants are highly unlikely to secure an offer of social rented housing.</p>	<p>colleagues to reflect in any future Housing Strategy for North Northamptonshire</p>
8	<p>Disabled applicants should not be experiencing significant waiting times for suitable housing</p>	<p>The draft scheme proposes that we will allocate adapted properties to those that have an evidenced need for those adaptations so that applicants with some disabilities do receive preference. The Equality Impact Assessment provides more detail on this. The banding system is framed to reflect medical need across the top three bands – A, B and C, depending on the severity of the medical need (severe, urgent or non-urgent).</p>	<p>We will continue to regularly monitor the needs of applicants on our waiting list particularly those that require more specialist property types including disabled adapted properties, and use this data to inform our strategic response to meeting housing need including future development and enabling opportunities.</p>
General	<p>Processing times:</p> <p><i>“There should be a deadline that the council should work towards for urgent cases”</i></p>	<p>If the comment is in the context of the time taken to process an application then the draft scheme includes service standards against which performance will be monitored; If it refers to time taken to secure a housing solution via the housing allocation scheme then the Council's ability to adhere to such deadlines is restricted by housing supply.</p>	<p>Ensure that performance indicators in the newly developed allocation processes monitor application processing times</p>
3 and 9	<p>Free movement and suitability of property offers</p> <p>A high number of</p>	<p>The CBL scheme means that many applicants will have choice over the areas in which they reside, and even when choice is removed (homeless applicant's for example) the Council</p>	<p>Closely monitor complaints and reviews relating to the suitability of property offers,</p>

	<p>applicants have expressed concern that the free movement proposal coupled with the removal of choice for some applicants will lead to unsuitable offers of accommodation away from current communities</p>	<p>will have to have regard to statutory suitability regulations when providing 'one reasonable offer' of accommodation to discharge such statutory duties. Suitability considerations include regard to the geographical location of the property as well as the property attributes, in the context of health, education, employment and support needs as well as other factors prescribed in statutory regulations. In the main, it is expected that such property offers will remain in an applicant's current locality or area of connection. If an applicant is offered a property which they feel is unsuitable for any reason, then they have a legal mechanism available to request a review of suitability in the case of homeless households (section 202 Housing Act 1996, as amended) and a mechanism in the draft housing allocation scheme to request a review of the allocation also. Refusal sanctions do not apply to refusals of unreasonable offers or unsuitable properties where there are genuine and evidenced factors that render a property and/or its location unsuitable.</p>	<p>and 'cross-boundary' moves in order to inform future annual reviews of the allocation scheme.</p> <p>Maintain the IT functionality to identify an applicant's locality connection which will future-proof the IT system should the evidence base obtained from this monitoring mean that we need to amend the proposed free movement rules.</p>
General	<p>Processing and monitoring</p> <p><i>"As with any process, the people delivering it are the key to success. Training needs to be thorough (it's quite complex!) and there need to be checks / audits of cases to determine if delivery has met the standards."</i></p>	<p>The Council will be subject to audits. Internal back office processes need to include periodic audits by managers to ensure consistency and accuracy in the application of the draft scheme. An allocations processes project to underpin the delivery of the draft scheme, if approved, is underway.</p>	<p>Ensure that the allocations processes project encompasses arrangements for robust staff training, and the development of a suite of procedures to support staff. Ensure that performance management arrangements include regular case file review samples to monitor adherence to the scheme.</p>
6	<p>Accessing village properties</p> <p>Some respondents spoke about the</p>	<p>The additional difficulties faced by those seeking affordable housing in rural locations is recognised. There is typically less housing stock for affordable rent and alternative housing solutions are at the less affordable</p>	<p>Ensure that the upgraded IT system provides customers with annually updated data on stock</p>

	difficulties they faced accessing housing in their villages of birth even with a recognised housing need	end of the housing market. Even where a priority band does apply to such a case, the low housing stock and turnover of stock in villages would likely mean that rehousing in a village would take an extended period of time.	levels and turnover by property size, type and location in order that service users can make informed choices on their housing options based on the likelihood of them securing a social housing solution in their area of preference.
7	Age criteria for bungalows An applicant commented on the lack of clarity as to whether both individuals in a couple need to be at least 60 years old to receive preference for a bungalow	Section 7.6 of the draft scheme deals with bungalows and that applicants over 60 receive preference for general needs bungalows without adaptations. This section doesn't clarify whether one or both people in a couple need to be aged 60+ so we have added some clarity to that in the final draft scheme. In respect of sheltered housing, the rules regarding the age of both individuals in a couple will depend on the policy of the individual social landlord.	The draft allocation scheme has been amended at section 7.6 to clarify that only one applicant in a joint application needs to be at least 60 years old to receive preference for general need bungalows
4 and 6	Neighbourhood Plans <i>“Consideration should be given to treating sites allocated for housing in Neighbourhood Plans in a similar way to Rural Exception sites which may act as an incentive to parishes to allocate sites in rural areas, thereby increasing overall supply”</i>	It is a possibility to include sites allocated in Neighbourhood Plans in the Band E exceptions, but this would require more consideration in terms of how this would be managed practically and supported by the IT system. It would be helpful to understand data as to how many Neighbourhood Plans apply and how many sites / affordable housing properties this applies to currently to determine whether, or how many, vacant properties it might apply to per annum for example.	Having regard to the timescales and the belief that this applies to very few properties / sites currently, we propose to proceed on the basis of the draft scheme if approved and gather relevant data on Neighbourhood Plans to inform our first annual review relating to this.
Sections 4.6 and 5.11 of the draft scheme	Children and U18's in the context of housing allocations One respondent working with young offenders	The move to a unitary council will ensure closer joint working with Children's Services and the project group notes the particular points relating to: <ul style="list-style-type: none"> • Guarantors for U18's • Children in temporary care These points will be fed into the Housing and Children's Services joint	Commitment to build upon existing joint working relationships with Children's Services, develop processes for common scenario's and

	requested clarity on this matter and the joint working of Housing and Children's Services referencing a specific scenario	working project group	provide clarity in future allocation schemes as necessary
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6.4.15 The table above shows that most feedback has not necessitated a change in the draft housing allocation scheme itself and explains the reasons for this. One change has been made to section 7.6 in order to provide clarity that was previously lacking as highlighted by one respondent. Although no further changes have been made to the draft scheme, the table above details how the feedback will inform future monitoring and reviews of the scheme and/or be fed into the workstream that is considering the future Housing Strategy for North Northamptonshire and the project team dealing with the new allocation processes.

6.5 Consideration by Overview and Scrutiny

6.5.1 None.

6.6 Environmental Impact

6.6.1 None.

6.7 Community Impact

6.7.1 There are currently almost 3900 applicants registered to and active on the existing four housing allocation schemes across North Northamptonshire. The draft North Northamptonshire housing allocation scheme has the potential to have a positive impact on existing applicants' prospects of securing accommodation as applicants will have access to a greater number of properties across North Northamptonshire under the new scheme.

6.7.2 The most noticeable change will be experienced by the 1,239 applicants to the existing Homes Direct scheme in East Northants as it is proposed that they will move to an amended version of the existing Keyways scheme utilised by the other three councils in North Northamptonshire. This will involve for example, existing applicants moving from a priority system of bands 1, 2, 3, 4 and X with a 'Priority Card' option, to a new system of Bands A – E. In practice, the comparison exercise that mapped out the various aspects of the four existing allocation schemes shows that many aspects of the Homes Direct scheme are broadly similar to the other Keyways schemes and there is unlikely to be a significant impact on any one group of applicants in relation to losing or gaining relative priority for an allocation of housing. This is largely because the draft scheme is framed on statutory reasonable preference categories which existing schemes also reflect. This means that the following categories of applicants must receive a priority for housing, and this will not change:

- People who are homeless as defined in Part 7 of the Housing Act 1996;

- People who are owed a particular statutory duty by any local housing authority under certain provisions of homelessness legislation;
- People occupying insanitary, overcrowded or otherwise unsatisfactory Housing;
- People who need to move on medical or welfare grounds, including grounds relating to a disability;
- People who need to move to a particular locality within the district to avoid hardship to themselves or others.

6.7.3 Existing applicants to the East Northants Homes Direct scheme will also experience slightly more disruption in relation to the reapplication process associated with the proposed new scheme and IT system. Whilst all existing applicants will need to take some action in order to have their personal and housing circumstances assessed in line with the new housing allocation scheme, Keyways applicants in Corby, Kettering and Wellingborough will experience this to a lesser degree as some of their existing details can 'transfer' to the amended and upgraded IT system. Applicants in East Northants will need to reapply in full to the new scheme. However this is not an unusual requirement with the delivery of a new allocation scheme and bespoke IT system and also acts to replace the annual renewal process whereby applicants are required to check and confirm the details on their applications each year anyway. In order to counteract this additional inconvenience for East Northamptonshire applicants as much as possible, the new application will include a field to note existing Homes Direct application reference numbers in order that a process of manual cross referencing can take place by back office staff avoiding the need for customers to provide extensive duplicate information and supporting evidence. Officers will ensure that sufficient opportunities for accessing help and support with the reapplication process are available and communicated to applicants.

6.7.4 A particular impact on current housing applicants to Corby Borough Council is that those with no housing need seeking general needs housing (a group of 555 households as at 10 December 2020) will not qualify to access the new North Northamptonshire housing register if the draft scheme is approved. In practice, and as the demand for social housing continues to increase, the impact would be minimal as is illustrated by the fact that only two Band E applicants were housed via Corby's scheme in 2019/20 – a figure that would be further likely to reduce with the adoption of a combined North Northants housing register.

6.7.5 There are many individual details of the new draft scheme which have been considered and harmonised. Section 6.6.3 in the 29 October 2020 report to the Shadow Executive Committee provides a summary table of some of the main variations between the existing allocation schemes alongside the proposals to align any differences. The project team have retained a detailed matrix and record of all decisions made should further information be required on specific detail. Unsurprisingly on the basis that the Localism Act enables local authorities to determine their own rules around who qualifies for their housing registers, the most significant changes that are required to align the existing schemes relate to who qualifies to access the housing register. Reassuringly, this aspect of the draft scheme was the part that received the highest rates of positive feedback and agreement from respondents who took part in the consultation (see section 6.4.9 of this report).

6.8 Equalities

- 6.8.1 An Equality Impact Assessment in respect of the draft North Northamptonshire housing allocation scheme was completed and made available alongside the consultation. Minor changes have been made to this Equality Impact Assessment further to some feedback obtained during the consultation and a revised version is available at ([link to web](#)).
- 6.8.2 Members will see from this assessment that there are two negative impacts noted in the assessment, based on age and socio-economic factors. Firstly, the equality impact assessment sets out how some young applicants, particularly those aged under 18 years, may be negatively impacted by the draft scheme but it provides the reasons for this and sets out in detail mitigations that have been built into the draft scheme to minimise such potential impact on this group of applicants. The draft scheme also negatively impacts homeowners and other applicants with significant earnings and/or savings however on the basis that such applicants will be evidenced to have alternative viable housing solutions available to them, this negative impact is felt to be necessary in the context of allocating the limited supply of affordable housing to those most in need and with few alternative housing options.

7. Background Papers

[Report taken to Shadow Executive on 29 October 2020](#)

Equality Impact Assessment ([link to web](#)).

Consultation responses