

Analysis of proposed changes to CHC Allocations Policy

| Proposed change | Benefits | Issues to consider |
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| <p>New build properties and local connection. <i>To introduce a local connection criteria whereby on new build properties and first let only successful applicants would be able to demonstrate a connection to the town that the property is being built in.</i></p> | <ul style="list-style-type: none"> • Applicants who are struggling to be allocated a property near to their work, support networks or where they have previously lived will have a greater chance of being allocated a property in the locality that they have a connection instead of having to move further afield. • Some areas in CE have high house prices which can exclude people from securing properties in areas where they have a connection. This policy change would increase their chances of securing a more affordable property in a location that they have a connection. • Turn over of stock for Housing Providers could be lower as people are accessing accommodation where they have links and therefore are more likely to stay put. | <ul style="list-style-type: none"> • The scheme must be framed so as to give reasonable preference to applicants who fall within the categories set out in s.166A(3), over those who do not. We need to ensure that introducing this policy change does not place us in contravention of this legal requirement (legal advice) • Social housing is aimed at delivering housing for people in housing need. We would essentially be prioritising local connection over and above need if we were to introduce local connection to all areas. This may have legal implications (same as above) • This change may decrease the chance for households who need to move as a result of fleeing violence, access new employment opportunities or to meet our obligations to rehouse homeless households under Part VII of the Housing Act. • Could limit the availability of options available to people in Band A and B who have an urgent need to move and could result in people being in unsuitable accommodation for increased periods (this will incur additional costs to CEC where a household is in Temporary Accommodation or Bed and Breakfast under a homeless duty). • The Allocations scheme currently enable customers to have significant choice over where they live in the Borough. This policy would change that position and would limit all applicants choice (change the policy to reflect the updated position in relation to choice) • This policy change would incur additional costs to both CEC and partners due to increased costs due to the need to verify evidence to demonstrate people's connection to the area |

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| | | <p>which they are interested in being rehoused. This would delay assessment and allocation processes potentially increasing void costs for providers.</p> |
| <p>Key workers <i>To introduce a keyworker scheme so that applicants who can demonstrate that they are a keyworker would be given preference on new build properties at first let only.</i></p> | <ul style="list-style-type: none"> • Attracts and retains a vibrant workforce • Key Workers have a fundamental role to play within our communities but high house prices often exclude key workers from living in the community in which they serve. • Local Plan Strategy specifies under Policy SC4 – Residential Mix that the mix of housing will be expected to include properties for key workers | <ul style="list-style-type: none"> • Currently no evidence that this policy change is needed. (data gathering exercise to be completed) • If approved, the number given would need to be proportionate to ensure legal requirements for giving reasonable preference to certain households in Sectn 166A of Housing Act Part VI are still met (legal advice). • Additional costs to CEC and Housing Providers due to detailed assessment and verification to be carried out. • Detailed work to be carried out to determine who will count as meeting the criteria for key worker e.g. weighing up does an agency worker at a hospital receive the priority or only if the applicant has a permanent offer. |
| <p>Capital limits and income checks. <i>To introduce checks and assessments to ensure that applicants who hold significant capital are given reduced preference for social housing. To introduce affordability checks</i></p> | <ul style="list-style-type: none"> • Households who are able to afford an alternative within the open market are prevented from taking up the valuable and scarce resource of social housing, thereby leaving social housing accommodation as more accessible to people whose other options are limited. • Ensures that households can afford the property that they are | <ul style="list-style-type: none"> • Would need to ensure that the capital limit and income limits that we are looking to set are fair and in line with other capital and income limits (e.g. HB limit of £16,000 capital) and is not set at a level that would leave households with no other housing option (financial impact assessment to be completed). • The income checks would need to ensure that they are reasonable and again, take into account a household's ability to afford alternative properties either in the private sector or under low cost home ownership options. (as above) |

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| <p><i>to ensure that households can afford the property they move into.</i></p> | <p>moving into so doesn't lead to eviction at a later date due to rent arrears.</p> | <ul style="list-style-type: none"> • Additional costs to CEC and Housing Providers due to detailed assessment and verification to be carried out. |
| <p>Eligibility. <i>To ensure that the policy is conforming legally to who should be allowed access to the housing register.</i></p> | <ul style="list-style-type: none"> • Ensures all applicants accessing the housing register and being allocated a property are entitled to do so. • Ensures applicants have means to pay for their accommodation. | <ul style="list-style-type: none"> • Make sure policy is in line with current Government guidance and legal changes. (legal advice) • Make sure Policy is clear around those EEA nationals who are not entitled to housing benefit but may be eligible for an allocation of social housing. Cannot exclude them from the register but would need to evidence that they can self fund their accommodation. • This will incur additional costs to CEC and Housing Providers due to detailed assessment and verification to be carried out. |
| <p>Bankruptcy and debt relief orders <i>To ensure that applicants who no longer have any debt attributed to them are awarded the appropriate level of priority on the housing register.</i></p> | <ul style="list-style-type: none"> • Applicants who no longer have any debt attributed to them can receive a banding priority to reflect their housing need (rather than being allocated a Band E for reduced preference) | <ul style="list-style-type: none"> • Need to ensure that applicants can evidence that the debt is no longer theirs. • Need to ensure that applicants can evidence that they can manage finances and a property going forward. |
| <p>Care leavers <i>To give care leavers a better</i></p> | <ul style="list-style-type: none"> • Care leavers up to the age of 26 will be given additional priority | <ul style="list-style-type: none"> • None |

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| <i>chance of being rehoused by awarding additional priority for a longer period of time.</i> | | |
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