



Housing Strategy
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Dear Fylde Coast Housing Providers

Re: Consultation on access to Social Housing

On behalf of Environment, Health and Housing Committee Fylde BC I am writing to formally respond to the consultation on the proposed changes to the Consistent Assessment Policy of the Choice Based lettings Scheme across the Fylde Coast, MyHomeChoice Fylde Coast.

This consultation has given us an opportunity to reflect on the role of the scheme in allocating social housing within Fylde and we would like to pass on our gratitude for the success of the scheme and the management arrangements in place that regularly review and update the scheme.

The proposed changes have been discussed at some length by Committee with feedback from the Housing Team at Fylde Council. Overall we would like to make the following comments:

1. We welcome the letting priority for households with a local connection to Fylde first and would request a period of 2 months be considered for households with a local connection to Fylde being sourced, prior to households from other boroughs being considered for accommodation. Based on the relet times we have been provided by registered providers with stock in Fylde this should not be an impossible consideration.
2. A Review of the changes after a period of two years that is informed by:
 - With the introduction of the Homeless Reduction Act the proposed changes need to enable local authorities to meet their new statutory prevention and relief duties. If in the allocation of properties local authorities are struggling to re-house households within the social rented sector the allocations policy will need to be revisited.
 - We understand a main driver for the changes in the challenges facing registered providers in allocating hard to let stock. We would recommend a review as to whether the proposed changes have improved the void turn-around times.
3. Social rented accommodation is more affordable than affordable rented tenure as the rents charged are more in line with HRA rates. In Fylde 2017/18 LHA rates are— Shared £61.50; 1

bedroom £85.00; 2 bedrooms £113.92; 3 bedrooms £130.00, and 4 bedroom £150.00. A higher percentage of social rented, as opposed to affordable rented need to be restricted for households in housing need applying for properties through that route as these households are more likely to be in receipt of Housing Benefit or the Housing Element of Universal Credit.

4. Condition properties are being re-let in needs to be considered, especially if one of the aspirations for the change is to compete with the private rented sector, where properties are often painted with carpets and curtains. This would be especially important with properties in hard to let areas. Decorating vouchers are paid, however if households are vulnerable with physical or mental health difficulties they potentially need more support to move into their new home.
5. Additional lettings restrictions on hard to let schemes need to be reviewed, for example no under 18's for 2 bedroom upper floor flats. Ruling out couples and families.
6. Where accommodation is for over 55's there is often support provided which can vary from an intercom to call centre to Scheme Manager visits. We would welcome this being means tested to some degree, to avoid households who could afford to purchase such provision off the open market accessing and removing the supply from households who are less able to afford open market provision.
7. Fylde BC does not own or manage social housing stock, however we still have a role to assess and plan for housing needs across all tenures and to make best use of existing stock to meet that need. Fylde BC will still operate with an Area Lettings Plan that will run alongside the Consistent Assessment Policy, this will be updated annually.
8. We would also recommend as part of the revised policy a marketing exercise is undertaken to promote the MyHomeChoice Fylde Coast.

In response to the individual consultation responses?

1. Do you live in:

This is a response on behalf of Fylde Councillors who represent residents within Fylde.

2. Do you agree or disagree with the revised local connection requirement?

We strongly agree with this proposal. Currently households move between the three boroughs, and could have lived in one area for several years, move out of the borough and lose their local connection. We understand that households would still need to have a local connection to Fylde to be allocated accommodations in the first instance and as in point 1 above, we would request a time period of 2 months for households with a local connection to Fylde to be sourced before the properties are opened up to households from neighbouring boroughs.

3. Do you agree with the introduction of two ways of lettings?

We agree with this proposal and would request further consideration is given to points 1 to 6 in our overall comments above.

4. Do you agree with how applicants are awarded a priority band?

We strongly agree with this proposal. It will simplify the understanding of housing need categories that gives households priority within the scheme.

5. Do you agree with restrictions on the use of the system by existing social housing tenants?

We strongly agree with this proposal. The availability of affordable housing within Fylde is not sufficient to meet the levels of housing need and existing social housing tenants should not be able to move unless they have been awarded a priority based on their current circumstances.

6. Do you agree with the priority for working applicants for some homes?

We agree with this proposal if there is a clear definition of 'working'. Within Fylde we have seen a growth in households accessing advice who are on zero hours contract, who may one week have less than 10 hours and the next week over 30 hours. In addition we are seeing a growth in households joining the register in tied accommodation.

We would advise the new allocations policy undergoes an impact assessment to ensure it is compliant with relevant legislation, such as the Equality Act.

7. Do you agree with giving more flexibility in the size of properties that applicants can bid for?

We strongly disagree with this proposal. Currently there is not enough stock within Fylde to allow households to under occupy accommodation. There is also the risk that if household's circumstances change and they need to apply for benefit towards their housing costs, they could quickly become in rent arrears and face the risk of losing their tenancy.

8. Do you think that, overall, the proposed arrangements will enable us to make the best use of the social housing stock in the area?

We neither, agree or disagree with this statement. As mentioned in our overall response we would request this policy is reviewed after a period of two years. In addition we welcome some changes such as changes to the priority banding, intention to meet the needs of households in employment and the simplification of priority bandings, but we disagree with households being allocated larger properties than their housing requirements and some allocation policies and the condition properties are re-let in need to be reviewed.

9. Do you agree with the current income and savings thresholds?

We strongly agree with the current restrictions on income and savings for social rented accommodation within Fylde. Over the past couple of years we have worked to deliver different intermediate tenures on sites such as shared ownership and discounted market sale for households who may struggle to purchase off the open market. Social rented accommodation is a restricted tenure within Fylde.

Thank you in advance for considering our response to the Consultation and we look forward to receiving a draft of the revised Consistent Assessment Policy for consideration by the Environment, Health and Housing Committee at Fylde BC.

Yours faithfully

A handwritten signature in blue ink, reading "B. Aitken". The letter "B" is large and stylized, followed by a period and the name "Aitken" in a cursive script.

Ben Aitken
Chair Environment, Health and Housing Committee
Fylde BC