

COMMITTEE	Agenda Item
	Brighton & Hove City Council

Subject:	Review of Allocation Plan 2020		
Date of Meeting:	18th November 2020		
Report of:	Interim Director Housing Neighbourhoods and Communities		
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Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

1.1 In December 2016 the Policy, Resources & Growth Committee (PR&G) adopted recommendations to approve a new Housing Allocations Policy for the city. This policy was referred to PR&G by the Housing & New Homes Committee on the 16th November 2016.

1.2 The first operational review of the Allocations Plan was presented to the Housing & New Homes Committee on 19th September 2018. The Housing & New Homes Committee noted the report and maintained the percentage lets to the four groups in the Allocations Plan to those agreed by the Policy, Resources & Growth Committee in 2016. It also recommended that the Committee receive a report, in two years' time, setting out the performance against the Allocations Plan, for the period January 2017-March 2020.

1.3 The allocated percentage of properties advertised remained as follows:

- Homeless 40%
- Transfers 30%
- Homeseekers 20%
- Council's Interest Queue (Social Services) 10%

The above are subject to a 5% tolerance in achieving the agreed percentages over the course of the year.

1.4 The accompanying Code of Guidance to the Housing Act 1996 Part 6 recommends that an Allocations Policy is kept under review. The Allocations Plan forms a part of the overall policy.

1.5 Housing Committee on 16 September 2020 noted:

“the temporary adjustments made within the Allocation Plan in response to the pandemic whilst aiming to achieve the overall agreed percentages in the Allocations Plan;

that the review of the Allocation Plan has been delayed due to the pandemic and subsequent pressures on the department but that this will be considered at the November Housing Committee.”

- 1.6 We are still dealing with the Covid 19 Pandemic and the full impacts on the local housing market and economy are still to play out. At the September Housing Committee, it was anticipated that the situation would be stabilising, and we would be in a position to consider the Allocation Plan in November. However, as the situation regarding Covid 19 is fluctuating, the position will remain as set out in September with the temporary flexibilities against the Allocation Plan to continue. In view of this situation, which remains very uncertain, this report provides a position statement based on performance against the Allocation Plan over the last few years. A further report will be forthcoming Housing Committee in April 2021 providing further review of the position based on the actual allocations, together with performance of a full year on from the start of the pandemic and with recommendations going forwards reflecting the position at that time.

2. RECOMMENDATIONS:

- 2.1 That Housing Committee note the current position and that a further report will be presented to Housing Committee in April 2021 when more is understood on the wider impact of the pandemic on housing need.
- 2.2 That Housing Committee agree that a review of the Allocation Policy is started in 2021/22 once more is understood about the full impacts of Covid 19 pandemic for the housing market and economy; including housing supply pressures and homelessness.

3. CONTEXT/ BACKGROUND INFORMATION

- 3.1 Councils are legally obliged, under the Housing Act 1996 Part 6, to have a policy that must be followed when they allocate social housing both within its own stock or where they nominate to a housing association. The legislation sets out certain groups that must be given reasonable priority for housing. The council agreed to implement the new policy in 2016, with amendments made in 2018.
- 3.2 The Allocations Policy introduced an Allocation Plan in 2016. This Plan introduced the concept of four queues within the policy. Each queue was given priority to a percentage of properties when advertised. As part of the Allocation Plan officers are required to provide a performance report on this area of work. The monitoring report is contained in Appendix 1ne to this report.
- 3.3 The period covered by this report is from the 3rd January 2017 to the 31st March 2020 as requested by Housing Committee and from April 2020 to the end of September 2020 Properties are advertised to one of the four queues in the policy. In order to assess the effectiveness of the Allocations Plan reporting looks at the results of each bidding cycle (every two week) regardless of when the property is let.

- 3.4 The Allocations Plan sets the percentage of the total properties allocated to each group/category on the housing register. The current annual targets are as follows:
- Homeless 40%
 - Transfers 30%
 - Homeseekers 20%
 - Council's Interest (Social Services) 10%
- 3.5 The monitoring period of this report covers the whole period since the Allocations Plan was introduced into the Allocations Policy in 2016. The plan was formally started in January 2017. This enables members to see year on year performance.
- 3.6 The table below provides a summary of actual lettings across the years. This table varies from the performance report in Appendix 1 which also include advertised properties where we do not yet have the recorded outcome. The overall percentages will therefore be lower in the appendix than in this table.

Group	2017-18	2018-19	2019-20	2020-21 April to end of Sept	Total	Overall percentage across all years
Homeless	306 (42%)	285 (40%)	230 (40.5%)	60 (60%)	881	42%
Transfers	190 (26%)	168 (24%)	138 (24.5%)	19 (19%)	515	24%
Homeseekers	209 (28%)	177 (25%)	126 (22%)	11 (11%)	523	25%
Council's interest	30 (4%)	72 (10%)	75 (13%)	10 (10%)	187	9%
Total	735	702	569	100	2106	

- 3.7 The reporting period 2019-20 and the first half of 2020 -21 notes that there was serious disruption to the lettings process due to the Covid-19 pandemic. This was due to the challenges in repairing and enabling viewings and letting properties due to the lockdown restrictions. This was also impacted by removal companies pausing trading and our vulnerable clients shielding which rendered any moves very difficult. As a result, there are 29 properties that were advertised that do not have a result. A recovery programme is underway to let these properties as soon as they are ready. The table above also shows the position to date of advertised properties in quarter one and two of 2020-2021. A total of 79 properties are still to be let. It is clear from the allocations to date that lettings in the current year will be severely impacted by the pandemic and that in the current uncertain situation substantive changes to Allocations Plan percentages are not recommended. This position will be reviewed at the end of the year as indicated above.
- 3.8 In an emergency response to the exceptional circumstances of the pandemic to try and move on some people from temporary accommodation, the priorities under the Allocation Plan were revised temporarily.

Numbers in temporary accommodation have increased, due to a combination of lettings being paused during lockdown and more people approaching as homeless. They were just over 1700 pre Covid which increased to just over 2100 at the beginning of September 2020.

Of this total, as at 10th October, 875 people were in short term and emergency accommodation. This figure includes the additional hotels and guest houses acquired due to accommodating those at risk of rough sleeping under the "Everyone In" approach. 250 of those 875, are in spot purchase B&B type accommodation.

In addition to the 2100, we have those verified rough sleepers in the Care and Protect accommodation, which is an additional 97 people as at 20th October.

We have only recently re-commenced lettings to social housing and so have temporarily revised the percentage of properties advertised as priority to accepted homeless to 80%. This is to enable the housing pressure and associated budget pressure to be released (as reported to Housing Committee on 16 September 2020). However, because of the very low numbers of lettings so far this year and the uncertainty of future allocations during the continuing exceptional circumstances arising from the pandemic (as set out in para. 3.7 above), we may not achieve the current targets.

Officers are therefore not able to make recommendations about changes in Allocations Plan queue percentages in the current year. Overall, we are aiming to retain the agreed priorities as per the current Allocation Plan. A report will be presented to Housing Committee in April 2021 setting out the final impact of lettings against each of the four queues and we anticipate this will inform recommendations about the Allocation Plan for 2021/22 to be presented to Housing Committee in April 2021.

- 3.9 The Allocation of social housing is linked to the use of Temporary Accommodation and the corresponding budget. Since the start of Covid 19, figures in emergency accommodation have increased from 525 to the current position of 875. The estimated cost of this growth to end of October 2020 is £2.500m. This includes those at risk of rough sleeping housed in hotel and university accommodation and so the costs are higher than normal spot purchase. Usually, each placement costs an average of £900 per month. Estimated costs shown are net of any rental income or HB collected.

In relation to Temporary Accommodation, the strategy going forwards is to reduce our overall need through increased prevention and move on opportunities and to increase the percentage of temporary accommodation which is owned and managed by the council.

Following the response to Covid 19 and providing accommodation for rough sleepers and those at risk of rough sleeping, the council successfully bid for grant under the Next Steps Accommodation Program (NSAP). One of the conditions of the grant is that we move on at least 40% of those accommodated under the Covid provision as at 30th September by 31st December and those subsequently verified as rough sleeping. This is a very challenging target, equating to 148

households by 31st December 2020, and will set the direction for enabling further reductions in our use of temporary and emergency accommodation.

There are several strands to achieving this 40% reduction. More detailed information on the council's response to requirements under the Next Steps Accommodation Programme (NSAP) are set out elsewhere on the Housing Committee agenda.

- 3.10 The allocation of social housing is governed by the Housing Act 1996 -part 6. This sets out certain groups that must be given reasonable or additional preference for housing. The accompanying Code of Guidance recommends that an existing Allocations Policy should be reviewed if there has been a significant change in legislation. In 2018 the Homelessness Reduction Act came into force. Now that this legislation has bedded in, and following the impact of the Covid 19 pandemic, it would be timely to review the policy and to ensure it aligns with the Council's new Homelessness & Rough Sleeping Strategy 2020-2025. It is proposed that this review is considered during 2021/22 for reasons outlined in para 2.2 above. When there is greater clarity about the impact of the pandemic a report will be prepared for Housing Committee in 2021 for members to consider the scope of such a review; resources required to undertake the review and to implement any agreed changes; timescales, and citywide consultation. The review of the Allocations Policy would be subject to a full Equality Impact Assessment.

4. ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS

- 4.1 Changes can be made to the Allocations Plan and to the percentage of lets to each of the four queues. Making changes will alter the number of properties advertised to each group by this percentage i.e. an increase in the percentage to one or more groups will have the result of decreasing the percentage of lets to the remaining groups.
- 4.2 When deciding to make changes to the Allocations Policy or the Allocations Plan the council will have to have due regard to the provisions of the Housing Act 1996 Part VI and the statutory Code of Guidance issued by the Secretary of State of the Ministry of Housing, Communities and Local Government. It must consider the impact of any changes where it is required to give a "reasonable or additional" preference to certain groups designated by legislation.
- 4.3 The Allocations Plan Review appendix contains various options that the committee may wish to consider in setting the percentage of lettings to the four queues in the Allocations Plan

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Due to the restrictions of the Covid 19 lockdown and the pressures that this has placed on services no direct community engagement or consultation has taken place.

5.2 The service did however carry out a full consultation in the development of the Council's Homelessness & Rough Sleeping Strategy that was agreed in July 2020.

5.3 Should the committee agree to a review of the full Allocations Policy then this would be subject to a full community engagement & consultation exercise.

6. CONCLUSION

6.1 The Allocations Plan has performed well and in line with the targets agreed by Housing Committee in December 2016.

6.2 Due to the serious longer-term implications on Housing in the city, due to Covid 19 and the exceptional circumstances of the pandemic it is noted that the performance on lettings has resulted in not being able to fully report on the 2019-20 financial year.

6.3 As the pandemic is still live and we are yet to see the impact for housing flowing from the impact on the economy and on the housing market, it would not be prudent to adjust the Allocation Plan at this time.

7. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

7.1 There are no direct financial implications arising as a result of the recommendations contained in this report. Any changes to the way social housing is allocated between the four queues will have different cost implications depending on which was increased or decreased, and this will need to be considered as part of the future report to Housing Committee.

Finance Officer Consulted: Monica Brooks

Date: 09/11/20

Legal Implications:

As the Committee with overall responsibility for housing, including homelessness, it is appropriate for the Housing Committee to receive this report. However, there are no significant legal implications to draw to Members' attention at this stage.

Lawyer Consulted: Liz Woodley Date 09/11/2020

Equalities Implications:

7.2 The Allocations Plan was formulated to enable a greater input as to where scarce resources are allocated. With demand for social housing exceeding supply it is necessary that these resources are delivered to those most in need of housing.

The Allocations Policy itself must follow legislation. The Allocations Plan has four queues. In each of these queues there will be applicants or members of their households that have protected characteristics under the Equality Act. The Policy has to give reasonable preference to certain groups of people including the homeless and those with a need to move due a medical reason or disability.

If the Allocation Plan is changed significantly there will be a need to carry out an Equality Impact Assessment. As part of any changes made to the Allocation Policy following that review, an Equality Impact Assessment will be undertaken and can encompass the Allocation Plan.

Sustainability Implications:

7.3 None

Any Other Significant Implications:

7.4 None

SUPPORTING DOCUMENTATION

Appendices:

1. Operational Review of Allocations Plan

Documents in Members' Rooms

None

Background Documents

1. None

