



Listening Learning Leading



**Vale
of White Horse**

District Council

Draft Housing Allocations Policy

CONSULTATION SUMMARY

**A review of the feedback on the proposed changes to the draft
Housing Allocations Policy**

DECEMBER 2018

CONTENTS

1. Summary
 - Background
 - Methodology
2. Key findings – Quantitative data
 - Key findings – Qualitative data
 - Key findings – Overall conclusions
3. Feedback on the consultation
 - How we have used the results of this consultation
 - Further information
4. Appendix A
 - Appendix B
 - Appendix C
 - Appendix D

SUMMARY

1. This report has been produced to analyse the comments received on the proposed changes to the draft Housing Allocations Policy (HAP) consultation. The policy sets out how South Oxfordshire and Vale of White Horse District Councils should assess applications to join the housing register and how we allocate housing resources available fairly, objectively and systematically.

We consulted on seven proposed key changes. The consultation ran for six weeks between 15 October and 26 November 2018. In total 180 responses were received, specifically 43 postal and 137 online submissions. Participants were asked a range of questions, each relating to a proposed change within the draft policy.

The consultation highlighted that there was support for the overall proposed changes to the policy. Certain policy changes received a variety of considerations which will be explored further in this report.

Two comments were received that were not formally submitted to the consultation as the participants did not complete the full online survey. These comments are referred to in Appendix C.

BACKGROUND

South Oxfordshire and Vale of White Horse districts are areas of high demand for affordable housing. Demand for affordable housing exceeds supply in both districts. The housing allocations policy describes the mechanisms by which the councils assess applications to join their separate housing registers and makes allocations for affordable housing within their districts.

In 1995 and 1997, South and Vale District Councils transferred their housing stock through Large Scale Voluntary Transfers (LSVT) to separate partner LSVT Registered Providers. The councils use their agreements with these partners to meet housing need in the district and discharge their statutory housing duties.

The councils work within the legal and regulatory framework governing the allocation of affordable housing. The housing allocations policy is generally reviewed every five years. This is considered to be the 'natural lifespan' of the policy and appropriately allows accountability for changes in key legislation and regulation.

A consultation strategy was developed that provided consultees with the opportunity to review the draft policy and summary document. The consultation then proceeded to ask questions regarding specific policy changes and provided a chance to provide general comments.

METHODOLOGY

The consultation methodology consisted of:

- developing a consultee database, comprising of existing housing register applicants, registered providers, other partner organisations, advice and support agencies, parish and town councils and district councillors.
- preparing a summary of the key changes in the Housing Allocations Policy for ease of understanding.
- an email notification to the consultee database, to provide a link to the documents and details on how to make representations. The notification was issued through the online consultation portal and the housing register system. A total of 4,276 email notifications were sent out. A copy of the email notification can be found in Appendix A.
- a letter to those consultees who opted in for postal correspondence. This included the summary of key changes, instructions on how to view full policy documents, a hard copy of the questionnaire and a free post envelope for ease of participating. A total of 739 letters were sent out.
- updating the websites and publishing the full draft report, summary documents and a link to the online survey.
- a focused online survey, offering the opportunity for participants to review the draft policy and comment in a six-week consultation period (a couple of late comments were also accepted). A copy of the survey can be found in Appendix B.
- a survey format that offered participants to indicate their level of agreement to the seven key proposals and overall changes proposed to the policy. Following on, to offer the opportunity for participants to comment on specific sections of the policy.

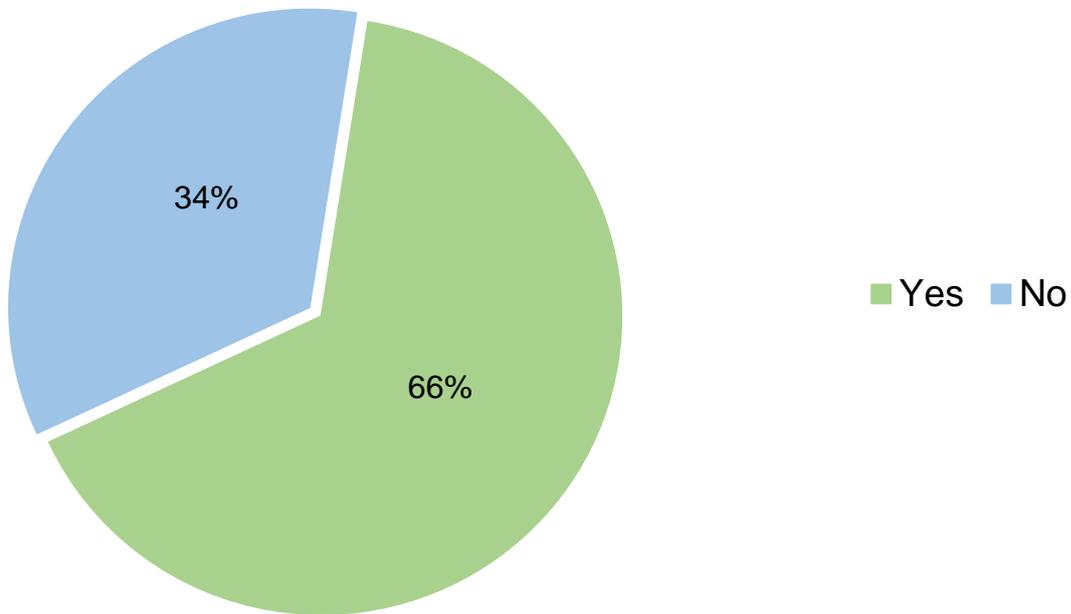
KEY FINDINGS – QUANTITATIVE DATA

2. The key quantitative findings from the consultation are summarised below.

There were 180 respondents to the consultation across both districts, of which 59% of responses related to South Oxfordshire District Council and 52% relative to Vale of White Horse District Council. All participants could make representations for both councils, with the ability to skip this specific question.

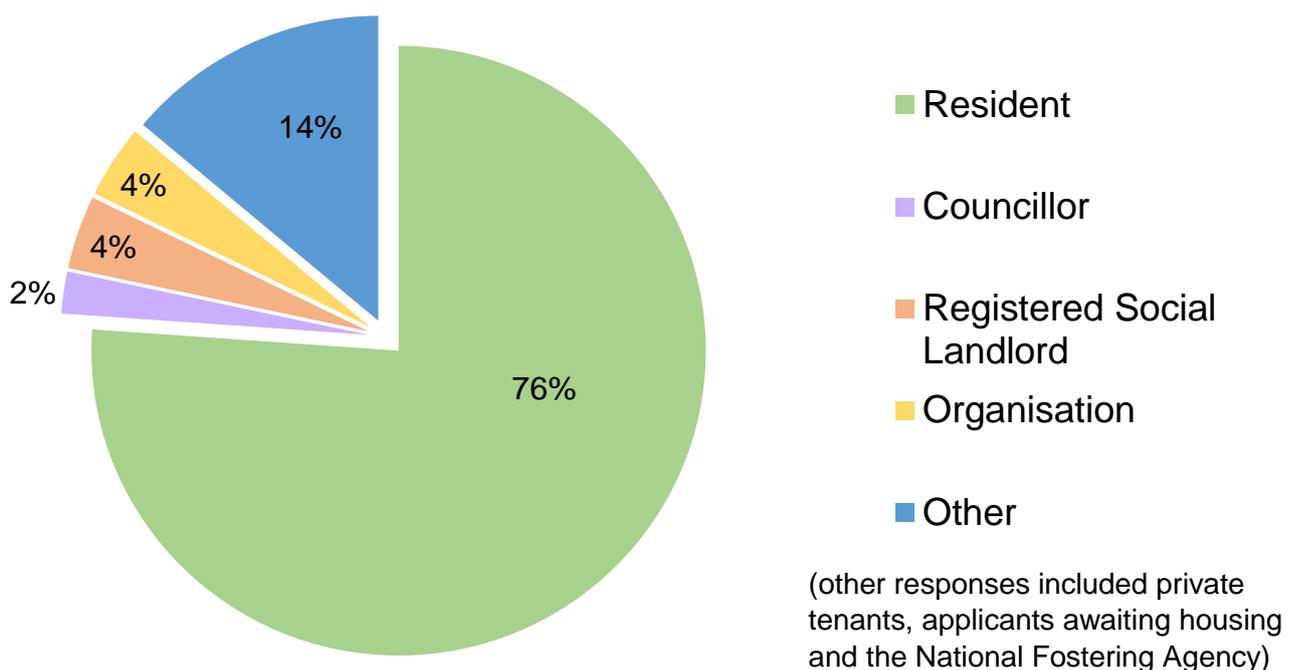
A variety of questions asked respondents about personal circumstances that would relate to the nature of the consultation. Responses highlighted that a high proportion of respondents were existing housing register applicants (66%).

Have you applied to be on the housing register?

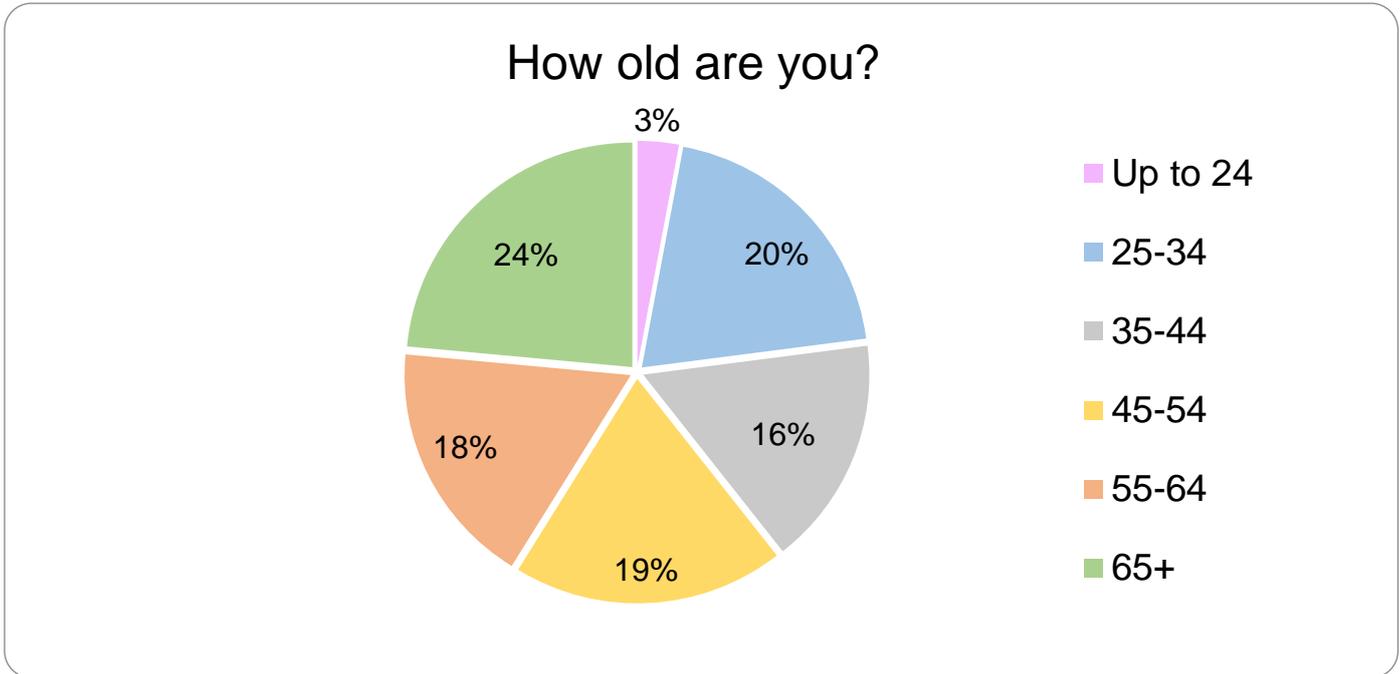


A variety of different respondents completed the consultation, with the majority being residents (76%). Respondents also included (but not restricted to) Registered Social Landlords (4%), organisations (4%) and councillors (2%).

In what capacity are you responding?

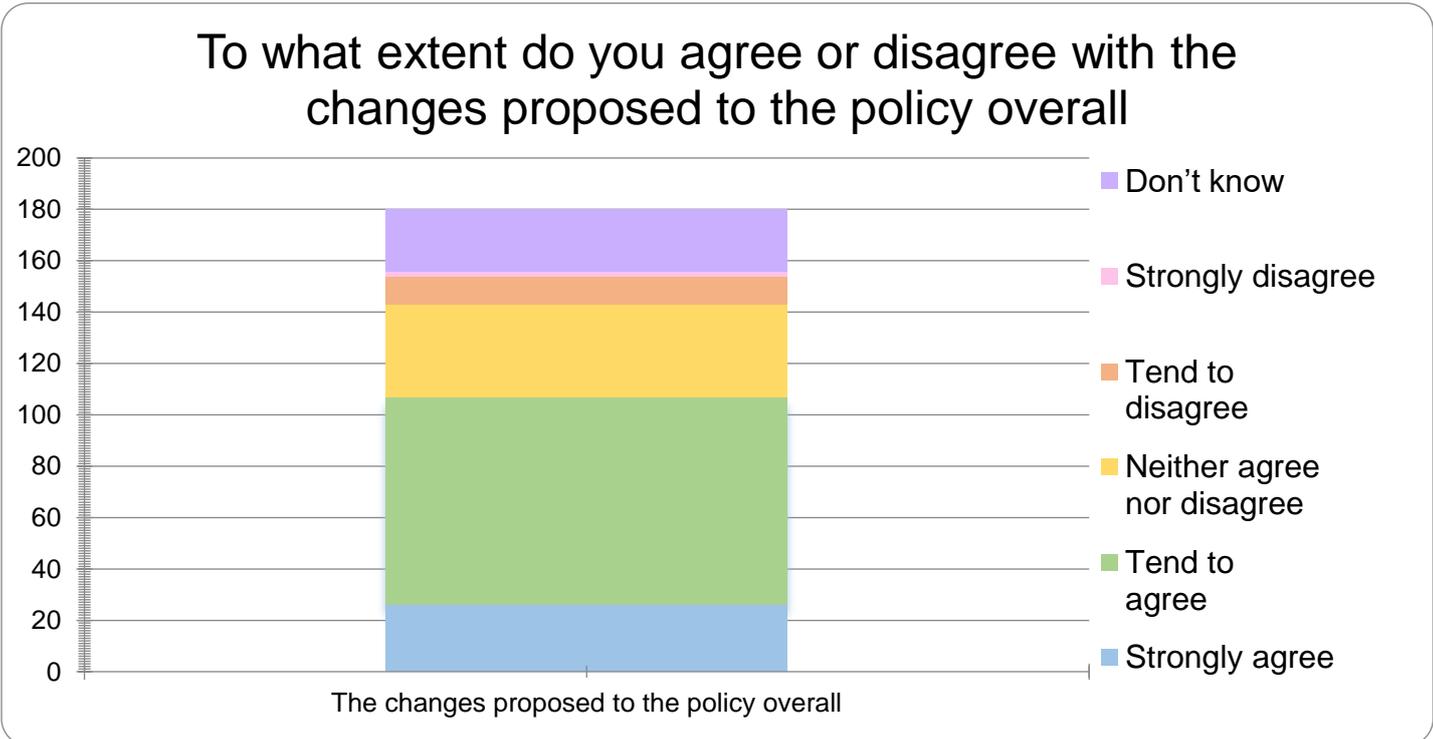


The consultation engaged with a variety of demographics. The pie chart below illustrates an even distribution of different age categories who participated in the consultation.



A substantial amount of respondents identified as female (69%), with a smaller proportion of males (27%) participating. Some respondents preferred not to say (4%). A large proportion of respondents specified that their day to day activities were limited because of a health problem or disability (72%). Additional demographic data can be found in Appendix D.

A high proportion of respondents agreed with the changes proposed to the policy overall (59%), with a minority of respondents disagreeing (7%). A significant proportion of respondents indicated they had no direct opinion (20%), and 13% of respondents didn't know.



KEY FINDINGS – QUALITATIVE DATA

The consultation allowed participants to make further comments and suggestions relating to specific key changes of the policy. This opportunity allowed respondents to openly indicate reasons behind their answers to the previous questions.

A range of different comments and suggestions were received. The opportunity to openly comment allowed individual respondents to refer to personal circumstances. A summary of important findings can be found below.

i. Overall changes to the proposed policy

A positive consensus supported the proposed changes to the policy, with 59.4% of respondents who either strongly agreed or tended to agree with the overall changes. Nevertheless, common themes included more consideration to be made for working and low-income families, young and elderly single individuals and those with a local connection to specific parishes. It was also noted that the duration that applicants are on the waiting list should be considered.

“It would be good to provide more properties for low income and working households who are unable or struggling to get on to the property ladder.”

More specific comments referred to the recognition of additional housing options for service personnel and greater exception for individuals who share equal custody of children. A variety of comments welcomed a cross-district and countywide approach to allowing Oxford City residents on to the South and Vale register. However, concerns were raised that demand for properties may become unmanageable.

“As housing is already over applied for, I think opening the bidding for Oxford City residents will land people already in need of housing on an even longer waiting list.”

ii. The proposal to keep Choice-Based lettings

Respondents illustrated positive support (73%) for the proposal to keep Choice-Based lettings. Comments emphasised the importance of offering applicants the opportunity to consider where they live with reflection on personal circumstances.

“I think this is a good idea as the individuals will have a better idea of what property suits their needs.”

Submissions included more support for individuals who do not have frequent access to a computer or the internet who could be at a disadvantage. Moreover, to have greater consideration for alternative family situations that may require couples to live in separate bedrooms due to medical reasons.

“Having to keep registering and lack of help to bid. I don't use computers. It should be a mix of choice and nominated to make process easier for many people.”

“Those of us without access to a computer are at a disadvantage.”

iii. The proposal to retain the current four priority need bands

This proposal received backing from respondents to keep the four priority bands (62.7%). The most common remarks referred to support for the bands and to keep them as they are.

“The four options are a well based system to consider all my needs.”

“This is good because there are people who have greater need than others.”

“I think these are fair.”

Other respondents disagreed with retaining the four priority bands (12.7%), labelling them as unfair and unhelpful to the wider demographic.

“Single working people should be considered equally to prevent homelessness and to allow them to contribute to the local economy.”

“I think the bands should be fairer and lower bands should have more chance.”

iv. The proposal that if Oxford City residents become eligible to join the housing register, they will be subject to this allocation policy

57.2% of respondents agreed with the proposal.

This proposal bought some criticism from respondents commenting further. It was indicated that 18.8% of respondents disagreed with this proposal. Common comments included concerns that Oxford City residents should not be eligible due to fears that the waiting list will increase if they were to join and that local housing should be allocated to people local to the district.

“Local housing should be for people within their own districts not those from the city as there is already enough demand in South and Vale.”

“Adding more people onto the list will exasperate the problem.”

Suggestions included prioritising allocation to South and Vale applicants with a higher band first, over that of an Oxford City applicant. However, other comments welcomed the suggestion of accepting others on to the register.

“First it is our choice then offer.”

“Of course, essential to offer same policy to all.”

“This policy change would widen the pool of applicants for Registered Providers and would reduce void loss and refusal rates.”

v. **The proposal that properties located on Great Western Park, Didcot, may be available to both South Oxfordshire and Vale housing register applicants**

This proposal was largely welcomed by respondents with 69.4% agreeing with the proposal. Many respondents indicated that it logically made sense as the development and amenities are split between the two districts. Slight concerns were raised that the opportunity of this offer could create a disadvantage to other applicants, as it allows those moving on to Great Western Park a link to both districts. Other suggestions put forward that this flexible approach should also be applied elsewhere.

“GWP is technically mainly in the Vale, but its nearest longer established schools, surgeries, shops, etc. are in SODC, so this is very important.”

“When a vale resident is successful in bidding on a GWP property, this then possibly gives them a link to the vale and south when their family grows, and they need to re-join the housing register. Giving them much more choice which would be unfair. The only way to make this fair is to allow the south bidders to bid on the new builds the vale side of GWP.”

“Agree. A sensible proposal that allows mobility within GWP. This mobility should be extended across both council areas. If somebody from Wantage gets a new job in Wallingford, then they should have equal access to the advertised properties in that district.”

vi. **The proposal to consider an applicant’s ability to pay any rent arrears before a decision to exclude them from the housing register**

This proposal gained support from respondents, who thought this proposal would promote better financial management for active housing register applicants. Comments illustrated that consideration should be sought on determining attributes to define the ‘ability to pay’, however a general consensus of respondents thought this proposal was good practice. Slight concerns referred to upcoming changes in national legislation, especially that of the introduction of Universal Credit which could affect applicants beyond their own control.

“I think you should look at people to make sure they have sufficient finances in place to pay the rent and other expenses so that they are not in a property that then is not paid for when there are other people who would pay.”

“Letting people rent homes which are ultimately too expensive will just lead to further debts and arrears.”

“It’s a deterrent to get into arrears in the first place and should encourage better money management.”

vii. The proposal that applicants on zero-hours contracts may potentially qualify as working households

This proposal was reinforced by many. Agreement was conveyed in comments that many people have no choice but to work in zero-hours contracts, nonetheless work full time hours. Indications also acknowledged the fact that even though they should be considered, awareness of irregular hours and therefore potential reduction in income should be monitored on allocation. The minority of comments disagreed with the proposal, with suggestions that making preferences could be unfair when applicants circumstances could have the potential to change quickly.

“Zero hours is a more popular job choice in this day and age, any job is better than no job at all.”

“This would help a lot of people.”

viii. The proposal to keep the main objectives of the housing allocation policy

Further comments evidently supported the idea of this proposal, with comments referring to the fair and transparent allocation service. Some suggestions indicated that improvements could be made to offer other methods of registering and bidding. Common themes also referred to not discriminating against individuals that cannot work due to medical or carers reasons.

“The current HAP is a fair and transparent service with some priorities given to working households.”

“Yes. I think these are sound.”

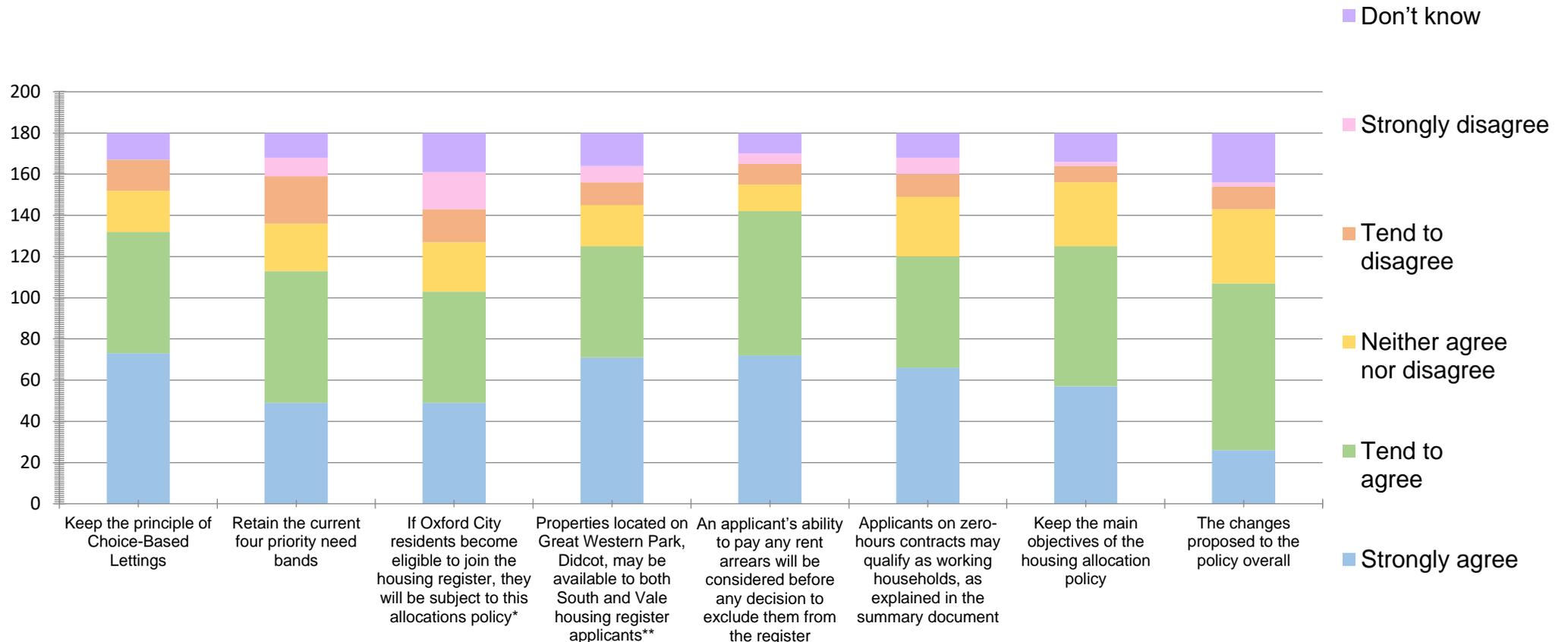
“Some people who may not be working may not have a choice at the moment. Does the housing allocation policy have any contingency plan for these people?”

KEY FINDINGS – OVERALL CONCLUSIONS

The summary document included within the survey allowed respondents to clearly understand the seven key proposed changes to the HAP. Participants were given the opportunity to put forward whether they agreed with the specific changes, through completing a matrix of preferences to eight statements.

The bar graph below depicts all responses received to the statements. The graph illustrates that supportive weight is held towards agreeing with the proposed changes. However, it also helps indicate that a small proportion of respondents disagreed with the proposed changes.

To what extent do you agree or disagree with each of the following changes proposed in the policy?



FEEDBACK ON THE CONSULTATION

3. The table below provides feedback from the Housing Needs Team to key comments received in the consultation.

What you told us	Feedback from the Housing Needs Team
<p>Respondents were asked their opinion on the proposal to keep Choice-Based lettings.</p> <p>Choice Based Lettings (CBL) allows housing register applicants to choose which eligible properties they bid for. The alternative is the councils nominate successful applicants to a particular property.</p> <p>73% of respondents either strongly agreed or tended to agree with this proposal with 8% disagreeing. The remainder expressed no view either way or didn't know.</p> <p>The following comments were made on this proposal:</p> <ol style="list-style-type: none"> 1. Choice in where you live is extremely important 2. In principle, CBL offers choice to tenants and promotes mobility. 3. Those of us without access to a computer are at a disadvantage 4. CBL unintentionally gate-keeps affordable housing from those in need. As property prices have increased ahead of wage growth, a larger number of working households feel 	<ol style="list-style-type: none"> 1. Agreed and noted. 2. Agreed and noted. 3. Applicants can register using paper application forms. They can also receive a weekly newsletter for the properties being advertised and place bids over the phone. Applicants may also nominate a third party to register and bid on their behalf. 4. All eligible households can join the housing register. The housing allocations policy supports working households who receive a preference for 20% of properties advertised.

<p>excluded from home ownership and should now be encouraged to consider affordable housing as an option.</p> <p>5. Having to keep registering and lack of help to bid- I don't use computers. It should be a mix of choice and nominated to make process easier for many people.</p>	<p>Working households may also be eligible for shared ownership properties.</p> <p>5. Applicants are required to renew their application annually to ensure their details are up to date. Applicants who have difficulty bidding or re-registering can nominate a representative to review their application or place bids. Officers also help applicants register and place bids over the phone.</p>
<p>Respondents were asked their opinion on the proposal to retain the current four priority need bands.</p> <p>The current four priority need bands received broad support in stakeholder engagement exercises and is considered a fair approach to reflecting housing need.</p> <p>63% of respondents either strongly agreed or tended to agree with this proposal with 13% disagreeing. The remainder expressed no view either way or didn't know.</p> <p>The following comments were made on this proposal:</p> <ol style="list-style-type: none"> 1. Single working people should be considered equally to prevent homelessness and to allow them to contribute to the local economy 2. This is good because there are people who have greater need than others. 3. Bedroom size should be taken in to consideration when awarding bands. A two-double bedroom property is very different from a double and a box room. 	<ol style="list-style-type: none"> 1. Single working persons are assessed using the same criteria as other households in the Housing Allocations Policy. Working households also receive a preference for certain properties. 2. Agreed and noted. 3. It would not be practical to assess bedroom sizes due to the number of households applying to the housing register.

4. SOHA recommends that South and Vale reduce to three bands: urgent; priority; standard. It should be allowed for all three bands to bid on all advertised properties. This change would lead to a simpler system and encourage more applicants to join the system by removing complex barriers.

4. There is a case for either decreasing to three priority bands or increase to five priority bands, for example as in Oxford City. However, four bands provides a balance between fairness and simplicity. This approach receives broad support, as demonstrated by the consultation responses.

All four bands are eligible to bid for most of the properties advertised.

Respondents were asked their opinion on the proposal that if Oxford City residents become eligible to join the housing register, they will be subject to this allocations policy.

The same eligibility and qualification rules to join the housing register will apply to Oxford City residents as set out in this allocations policy. (except the local connection criteria). The limitations placed upon Oxford City residents participating in Choice Based Lettings are also set out in this allocations policy. Any decision to allow residents of Oxford City to join either South Oxfordshire or Vale of White Horse District Councils' housing registers will be subject to the adoption of proposals in the Local Plans for each district.

57% of respondents either strongly agreed with or tended to agree with this proposal with 19% disagreeing. The remainder expressed no view either way or didn't know.

The following comments were made on the proposal:

1. People cannot be housed as it is. Adding more people onto the list will exasperate the problem.
2. I fear I will be pushed even further down the ladder to be housed if Oxford City residents come.

1. The housing allocations policy is the mechanism to allocate properties within South and Vale. The decisions on the numbers and location of properties available to Oxford City residents are decisions subject to the district's Local Plans.
2. As above. The alternative to allowing Oxford residents to join Vale's housing register would either be to allocate identified

<p>3. This policy change would widen the pool of applicants for Registered Providers and would reduce void loss and refusal rates.</p> <p>4. I think priority should still be given to those in higher bands from Vale of White Horse/South Oxfordshire</p>	<p>properties using Oxford City's allocations policy, or to produce a new policy that would require agreement by both Vale and Oxford City.</p> <p>3. Agreed and noted.</p> <p>4. Noted. Most properties advertised will continue to be prioritised for Vale or South residents in the event that Oxford City residents are permitted to join the housing registers.</p>
<p>Respondents were asked their opinion on the proposal that properties located on Great Western Park, Didcot, may be available to both South Oxfordshire and Vale housing register applicants.</p> <p>This will allow greater flexibility across the district borders for applicants in housing need. Properties in Great Western Park will first be advertised to housing register applicants in the district where the property is located.</p> <p>69% of respondents either strongly agreed with or tended to agree with this proposal with 11% disagreeing. The remainder expressed no view either way or didn't know.</p> <p>The following comments were made on the proposal:</p> <p>1. Agree. A sensible proposal that allows mobility within GWP. This mobility should be extended across both council areas. If somebody from Wantage gets a new job in Wallingford then they should have equal access to the advertised properties in that district.</p>	<p>1. Agreed. Any future decision to extend bidding across South and Vale would be a decision by the district councils.</p>

<p>2. GWP is technically mainly in the Vale, but its nearest longer established schools, surgeries, shops, etc. are in SODC, so this is very important.</p> <p>This would be a good option as long as it was to work both ways, i.e. for every Vale applicant given a SODC property an equal status property can be allocated in the Vale district to SODC applicants.</p>	<p>2. Agreed and noted.</p> <p>The proposal does work both ways in that properties located in South could become available to Vale applicants and vice versa.</p>
<p>Respondents were asked their opinion on the proposal to consider an applicant's ability to pay rent arrears before any decision to exclude them from the housing register.</p> <p>This will allow greater flexibility to consider an individual's financial circumstances.</p> <p>79% of respondents either strongly agreed with or tended to agree with this proposal with 8% disagreeing. The remainder expressed no view either way or didn't know.</p> <p>The following comments were made on the proposal:</p> <ol style="list-style-type: none"> 1. I don't think this should be changed, it's a deterrent to get into arrears in the first place and should encourage better money management. People will possibly just get into more money difficulty. 2. As long as the council staff assesses the ability to pay. This should not lead to additional work for Registered Provider staff. 3. I like this, important not just to remove from register but difficult to determine "ability to pay". 4. Letting people rent homes which are ultimately too expensive will just lead to further debts and arrears. 	<ol style="list-style-type: none"> 1. Applicants allowed to join the register with rent arrears will be expected to address these arrears before they can be offered a property. Applicants may be in expensive accommodation and by making them ineligible for the register may increase their debts and potentially lead to homelessness. 2. Officers will assess the ability to pay. 3. Agreed and noted. 4. Agreed and noted.

Respondents were asked their opinion on the proposal that applicants on zero-hours contracts may potentially qualify as working households.

This reflects the increasing number of employees on zero hours contracts who are resident in the districts. Applicants on zero-hours contracts may be able to establish a local connection to the district in which they work. They may also qualify for the working household preference awarded for 20 % of properties advertised through Choice Based Lettings.

67% of respondents either strongly agreed with or tended to agree with this proposal with 11% disagreeing. The remainder expressed no view either way or didn't know.

The following comments were made on the proposal:

1. People on zero hours' contracts are disadvantaged in many ways. Housing should not be one of them.
2. People should not be penalised because of their employment status.
3. They would need to pay rent just the same as everyone else. It's sad that zero-hour contracts exist.
4. I do not agree with this, as people's situation can change quickly and cannot guarantee earnings to cover out goings to get preference totally unfair.
5. Many zero-hours employers work full time.

1. Agreed and noted.

2. Agreed and noted.

3. Applicants with zero hours' contracts will be assessed on the same basis as other working households.

4. Applicants on zero hours' contracts will need to confirm their recent work history before being nominated for a property.

5. Agreed and noted.

Respondents were asked their opinion on the proposal to keep the main objectives of the housing allocation policy.

The key aim of the policy is to promote the fair and transparent allocation of affordable housing. In addition, where possible the councils will meet priorities aimed at:

- a. Giving priority to working households to encourage people into work.
- b. Improving the opportunities for local people to access new build developments in their parish / village.

69% of respondents either strongly agreed with or tended to agree with this proposal with 6% disagreeing. The remainder expressed no view either way or didn't know.

The following comments were made on the proposal:

1. I do think priority should be given to working families. But what about people who can't work because they are full time carers to severely disabled family members?
2. I agree but there shouldn't be any discrimination against people who unfortunately are not working .
3. Some people who may not be working may not have a choice at the moment. Does the housing allocation policy have any contingency plan for these people?
4. The current HAP is a fair and transparent service with some priorities given to working households. Any local preferences should not be too prescriptive (i.e. parish only can be restrictive in seeking bids).

1. Preference to working households only applies to 20% of lets. The remaining 80% of lets are available to all eligible applicants.
2. See previous response immediately above.
3. Properties advertised on Choice Based Lettings are available to all eligible applicants. The additional preference to working households does not apply to 80% of properties advertised.
4. Agreed and noted.

5. Would be easier if could do register and bidding on phone and automatically sent choice of house suitable.

5. Applicants with difficulty accessing CBL online can receive weekly paper copies of advertised properties and bid by phone.

Respondents were asked their opinion on the overall changes proposed to the policy.

59% of respondents either strongly agreed with or tended to agree with this proposal with 7% disagreeing. The remainder expressed no view either way or didn't know.

The following comments were made on the overall proposed changes to the policy:

1. I would like to down size from a 3 bed to a 2 bed but I only qualify for a 1 bed place to which I would not consider, I think many tenants would down size if they could still a have spare room
2. The allocation priority given to service personnel doesn't appear to recognise that they have other options (MOD funded properties) and such a priority doesn't appear to be reflected in the Equality Assessment.
3. I am a father with a shared residency court order for my daughter who stays with me for 110+ nights a year. I believe it is wrong that I can only bid on 1 bed properties. As a result, I am discriminated against and excluded so have to rent in the private sector. For the stability of my daughter she needs her own room when with me. I've always advocated equality but I feel with the current policy I am bottom of the priority list.
4. I totally disagree with the limit to 5-year tenancy agreements, where will be the incentive to make it your home, if you have the chance of losing all you have invested into it.

1. The allocations policy encourages downsizing by giving priority banding to social housing tenants under-occupying their property. The policy reflects that social tenants with a spare room are still subject to the under-occupancy penalty (bedroom tax) if they are in receipt of benefits.
2. The additional preference afforded to armed personnel is a statutory requirement.
3. The allocations policy reflects that children on the housing registers may not have their own room at all and may also be living in overcrowded conditions. It is therefore not the best use of a scarce resource for a bedroom to be unoccupied for 50 per cent or more of the year.
4. Fixed term tenancies are policy decisions taken by the Registered Provider and do not form part of the allocations policy.

5. Define and strengthen the policies for housing allocations for those applicants and existing tenants who have particular physical, mental or social needs. Great weight should be given to allocating housing within EASY reach of the required services. Housing in isolated rural locations is not appropriate when frequent use of services, concentrated in urban centres, is required. The availability of public transport should be more thoroughly investigated. The mere presence of a rural bus service does not make it appropriate for commuting or accessing services if it runs infrequently or is a subsidised service likely to be cut. Housing vulnerable or needy tenants in rural areas disadvantages those tenants and prejudices their chances of employment, health provision and services.

6. Members (Abingdon-on-Thames Town Council) strongly agree with main proposals outlined in the summary from points 1 to 7 with the exception of point 7a which states that where possible the councils will meet priorities aimed at “giving priority to working households to encourage people into work”. Members expressed concern that this could potentially lead to discrimination as people with a disability, for example, cannot always work.

Members also asked that I convey to you their view that people who have been transferred from Oxford City Council housing waiting lists should be treated fairly alongside those from the South and Vale’s own lists; housing should be allocated fairly, by need.

7. There should be consideration given to the length of time an applicant has been listed on the housing register with

5. The policy allows vulnerable tenants to participate in Choice Based Lettings and express their own choices on where they want to live. The location of properties is clearly explained to nominees and discussions may be held with support workers to discuss the suitability of a nomination.

6. Only 20% of properties receive a preference for working households. Disabled applicants may receive additional priority under other parts of the allocations policy. Disabled-adapted properties are prioritised for applicants with a recognised need for those particular adaptations.

The same qualification criteria will apply to all eligible applicants in this allocations policy. Only certain properties identified to address Oxford’s unmet housing need will have a preference for Oxford City applicants.

7. The length of time on the housing register is taken into account and normally determines who receives a nomination when applicants are in the same priority band.

<p>credits given towards the bidding process, which would give such applicants a fighting chance of getting housed.</p> <p>8. Applicants who have a sole or joint household income of over £60, 000 gross will be excluded from the housing register. What happens after people have moved in to a house and their income goes over the threshold? No information on that?</p>	<p>8. Applicants that are re-housed are removed from the housing register. If an applicant subsequently applies to re-join the register, their eligibility will be assessed in accordance with their current financial circumstances. Changes in financial circumstances are not re-assessed during a tenancy.</p>
<p>Comments from Oxford City Council</p> <p>This response is an Oxford City Council Officer response only.</p> <p>In relation to Section 13 (i) of the Draft Policy (Oxford's Unmet Housing Need):</p> <p>It is acknowledged that the provisions in the draft new allocations policy have been written with reference to how the Vale Of White Horse (VOWH) District Council will allocate the proportion of affordable properties intended to meet Oxford's unmet housing needs (i.e. the apportionment agreed through the Growth Board and set out in the Local Plan). It is also acknowledged that part 13 (ii) of the draft allocations policy allows for some amendment when any decision is made by South Oxfordshire District Council in relation to addressing Oxford's unmet housing need in its Local Plan. Inclusion of section 13 in the Allocations Policy is positive however, Officers of the City Council would welcome an opportunity to be further consulted on any proposed Allocations Policy amendments in relation to decisions made by South Oxfordshire District Council.</p> <p>It is understood that the VOWH Allocations Policy will set aside properties to be allocated with preference to residents of Oxford (who are on the VOWH housing register) over those who are not resident in Oxford and on the VOWH housing register. Priority for</p>	<ul style="list-style-type: none"> Officers at Oxford City will be consulted upon any proposed amendments to this policy in relation to decisions made by South Oxfordshire District Council concerning Oxford's unmet housing need.

those specific properties will be given any housing applicant with an Oxford residence connection (i.e. eligible housing applicants in the new Priority Needs Bands 1 to 4). Any resident of Oxford who applies for affordable housing in the VOWH local authority area, would still need to meet the ordinary qualification criteria applied by VOWH with the exception of a local connection. In 13 (i), the Allocations Policy states that the selected properties will be in the Abingdon-on-Thames and Oxford Fringe sub-area. It will be important to ensure that the affordable housing units intended to meet the agreed apportionment of Oxford's unmet housing need in the VOWH Local Authority area, are identified and secured through Planning Agreements in order to align with the intentions of the VOWH Local Plan.

13 (i) Also states that 'if no eligible Oxford City resident bids for the selected property, it will be offered to other bidders in the district'. It will be important therefore, to ensure that there are opportunities to proactively promote the housing opportunity presented by these properties to eligible housing applicants with an Oxford residence connection. This will require collaborative working between the City and VOWH District Council to ensure that suitable bidding periods are allowed and good advertising arrangements are in place to maximise the opportunity for eligible applicants to bid for them through the Choice Based lettings scheme. A joint approach to simplifying the customer journey would be welcome i.e. in terms of application and local connection verification. More detail on how the City Council and VOWH colleagues could work in partnership to develop a suitable and more detailed arrangement would also be very welcome.

In terms of the arrangements with South Oxfordshire District Council, if the District agrees to set aside properties to meet Oxford's unmet housing need, Officers request that the allocation arrangements for the affordable housing (i.e. with priority preference to eligible housing applicants with an Oxford residence

- This is the correct understanding of how this policy will operate in relation to Oxford's unmet housing need. Further discussions will be held with Oxford City regarding the allocation of properties on specific sites.

- Officers will consult and seek to agree a joint approach with Oxford City on the details of the arrangement.

connection) reflect the same or similar arrangements to those set out by VOWH and are reflective of the comments made above. In addition, provision of housing that is intended to meet Oxford's unmet housing need would be best located in areas close to the City and supported by effective public transport connections into Oxford.

- This is noted; however, this would be a decision for South Oxfordshire District Council.

HOW WE HAVE USED RESULTS OF THE CONSULTATION

Thank you to everyone that has participated in the consultation.

The final policy document will take into consideration all comments received and will be review by the councils' cabinets on Thursday 31 January and Friday 1 February 2019, to decide whether it will be formally adopted.

FURTHER INFORMATION

For information about the consultation or the results presented in the report, please contact the Community Engagement Team on haveyoursay@southandvale.gov.uk

To enquire about the councils' work on the Housing Allocations Policy, please contact the Housing Needs Team:

write to us on: South and Vale District Councils
135 Milton Park
Milton
Abingdon
OX14 4SB

email us on: housing@southandvale.gov.uk

call us on: 01235 422436

APPENDIX A

4. A copy of the email notification sent out to consultees.

Dear Sir/Madam,

We are proposing some changes to our “Housing Allocations Policy” which sets out how South Oxfordshire and Vale of White Horse District Councils assess applications to join the housing register and how we allocate social housing within the districts.

The current policy is nearly five years old (which is a normal lifespan) and we need to update it to:

- reflect new legislation and welfare reform, particularly in relation to affordability;
- review who will be able to bid for social housing and the priority awarded to applicants; and
- consider the process to meet any agreed proposal to contribute towards addressing Oxford’s unmet housing need.

We are inviting comments on the proposed changes from **Monday 15 October until 5pm on Monday 26 November 2018**.

How to view the policy

We have prepared a document that summarises the key changes to the policy, which you can view [here](#). Alternatively, you can view the [full policy](#).

The documents are also available to view at South Oxfordshire and Vale of White Horse District Councils office, 135 Eastern Avenue, Milton Park, Abingdon, OX14 4SB between 8.30am and 5pm Monday to Thursday and 8.30am and 4.30pm on Fridays.

How to comment

You can view the key documents and submit your comments on the proposed changes online at <https://survey.southandvale.gov.uk/s/HAP2018/?m=12345abcde>

Please do not send us queries about your individual housing application. These cannot be dealt with as part of the consultation process. If you have a query regarding your housing, please email housing@southandvale.gov.uk or call **01235 422436**.

The results of the consultation will be used to inform the final policy which the councils' cabinets will consider. Information about what you told us and how we have responded to comments will be published on the Have Your Say pages of our websites.

Please note: only the names of organisations submitting responses will be published in the report, not individuals. Consultation data will be deleted after the report has been published.

For more information about the consultation, or to obtain a paper copy of the full policy, please email haveyoursay@southandvale.gov.uk or call **01235 422600**.

Kind regards
Phil Ealey
Housing Needs Manager, South and Vale District Councils

This link is uniquely tied to this survey and your email address. Please do not forward this message.

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
available to both South and Vale housing register applicants**						
An applicant's ability to pay any rent arrears will be considered before any decision to exclude them from the register	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Applicants on zero-hours contracts may qualify as working households, as explained in the summary document	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Keep the main objectives of the housing allocation policy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The changes proposed to the policy overall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*** Any decision to allow residents of Oxford City to join either Vale of White Horse or South Oxfordshire District Councils' housing register will be subject to the adoption of proposals in the local Plans for each district.**

**** Properties will first be advertised to housing register applicants in the district where the property is located.**

4. Comments or suggestions

4. Please indicate below if you have any comments or suggestions relating to specific proposed changes. You can tick as many options as you like. For general comments, please tick the first option "Overall changes proposed to the policy". If you have no further comments, please click next page.

Overall changes proposed to the policy

- Keeping the principle of choice-based lettings
- Retaining the current four priority need bands
- If Oxford City residents become eligible to join the housing register, they will be subject to this allocations policy
- Properties located on Great Western Park, Didcot, may be available to both South Oxfordshire and Vale housing register applicants
- Consider an applicant's ability to pay any rent arrears before any decision to exclude them from the housing register
- Applicants on zero-hours contracts may potentially qualify as "working households"
- Keep the main objectives of the housing allocation policy

5. Please provide your comments below on the overall changes proposed to the policy

Please provide your comments below about the proposal to keep the principle of choice-based lettings

6. Please provide your comments below about the proposal to retain the current four priority need bands

7. Please provide your comments below about the proposal that if Oxford City residents become eligible to join the housing register, they will be subject to this allocations policy

8. Please provide your comments below about the proposal that properties located on Great Western Park, Didcot, may be available to both South Oxfordshire and Vale housing register applicants

9. Please provide your comments below about the proposal to consider an applicant's ability to pay any rent arrears before any decision to exclude them from the housing register

10. Please provide your comments below about the proposal that applicants on zero-hours contracts may potentially qualify as working households

11. Please provide your comments below about the proposal to keep the main objectives of the housing allocation policy

About you

12. Are you responding as a: (please tick one box only) *

- Resident
- Councillor
- Registered Social Landlord
- Organisation
- Other (please specify):

13. What organisation or area are you representing?

14. Your role?

Equalities

We are committed to making sure that residents have equal access to services. Please help us to keep track of how successfully we are achieving this by ticking the appropriate question boxes below.

All information is confidential and will only be used to help us monitor whether views differ across the community

15. Which of the following describes how you think of yourself?

- Male
- Female
- In another way

Prefer not to say

16. How old are you?

Under 16

16-24

25-34

35-44

45-54

55-64

65+

17. Are your day to day activities limited because of a health problem or disability which has lasted or is expected to last 12 months or more? Please include problems related to old age.

Yes

No

18. What is your ethnic group?

White

Black or Black British

Mixed or multiple ethnic groups

Asian or Asian British

Other ethnic group

19. White: *

English, Welsh, Scottish, Northern Irish, British

Irish

Gypsy or Irish Traveller

Any other white background (please specify):

20. Black or Black British: *

Caribbean

African

Any other Black background (please specify):

21. Mixed or multiple ethnic group: *

White & Black Caribbean

White & Black African

White & Asian

Any other mixed background (please specify):

22. Asian or Asian British: *

Indian

Pakistani

Bangladeshi

Chinese

Any other Asian background (please specify):

23. Other ethnic group:

Arab

Other ethnic group (please write in):

APPENDIX C

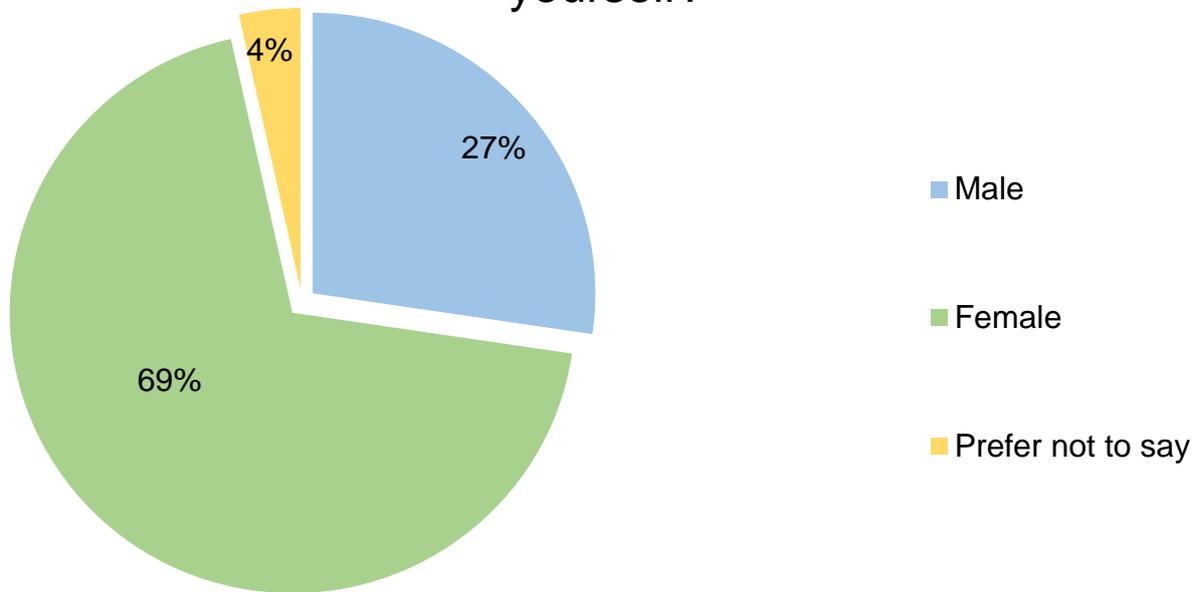
The below table includes additional comments received but were not formally submitted to the consultation due to participants not completing the full online survey.

Q7. Please provide your comments below about the proposal that if Oxford City residents become eligible to join the housing register, they will be subject to this allocations policy	So long as Vale/South ox residents can apply to live in the city.
Q8. Please provide your comments below about the proposal that properties located on Great Western Park, Didcot, may be available to both South Oxfordshire and Vale housing register applicants	If residents of the value are allowed to bid on gwp houses and are successful then that then gives them a link to both vale and south when there family grows and they rejoin bidding. Giving them more choice. I think this would only be fair if south can bid on the vales new builds aswell. I would love to be able to bid on vale houses to be nearer to my son's special needs school but I have no family links to the vale. The priority to working families, yes is a good idea. But what about people like myself who can't work because I have no choice but to be a full time carer to my severely disabled son.

APPENDIX D

Other demographic data collected in the consultation.

Which of the following describes how you think of yourself?



What is your ethnic group?

