



Draft Allocations Policy Consultation

Full consultation report

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Introduction & methodology





Southampton City Council undertook a public consultation on a Draft Allocations Policy consultation.

This consultation took place between **30/01/2024 – 18/03/2024** and received **428** responses.

The aim of this consultation was to:

- Communicate clearly to residents and stakeholders the proposals for the Draft Allocations Policy consultation;
- Ensure any resident, business or stakeholder in Southampton that wished to comment on the proposals had the opportunity to do so, enabling them to raise any impacts the proposals may have, and;
- Allow participants to propose alternative suggestions for consideration which they feel could achieve the objectives of the policy in a different way.

The primary method of gathering feedback for this consultation was via online questionnaire. Physical paper versions of the questionnaire were also made available, and respondents could also email yourcity.yoursay@southampton.gov.uk with their feedback, as well as respond by post.

This report summarises the aims, principles, methodology and results of the public consultation. It provides a summary of the consultation responses both for the consideration of decision makers and any interested individuals and stakeholders.

It is important to be mindful that a consultation is not a vote, it is an opportunity for stakeholders to express their views, concerns and alternatives to a proposal. This report outlines in detail the representations made during the consultation period so that decision makers can consider what has been said alongside other information.



Southampton City Council is committed to consultations of the highest standard and which are meaningful and comply with the *Gunning Principles*, considered to be the legal standard for consultations:

1. Proposals are still at a formative stage (a final decision has not yet been made);
2. There is sufficient information put forward in the proposals to allow ‘intelligent consideration’;
3. There is adequate time for consideration and response, and;
4. Conscientious consideration must be given to the consultation responses before a decision is made.



New Conversations 2.0
LGA guide to engagement



Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

1. **proposals are still at a formative stage**
A final decision has not yet been made, or predetermined, by the decision makers
2. **there is sufficient information to give ‘intelligent consideration’**
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
3. **there is adequate time for consideration and response**
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,¹ despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
4. **‘conscientious consideration’ must be given to the consultation responses before a decision is made**
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the ‘Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan²), which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey³), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.⁴

¹ In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

² BAILII, England and Wales Court of Appeal (Civil Decision) Decisions, Accessed: 13 December 2016.

³ BAILII, United Kingdom Supreme Court, Accessed: 13 December 2016

⁴ The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



The agreed approach for this consultation was to use an online questionnaire as the main route for feedback; questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured way, helping to ensure respondents are aware of the background and detail of the proposals.

Respondents could also write letters or emails to provide feedback on the proposals: emails or letters from stakeholders that contained consultation feedback were collated and analysed as a part of the overall consultation.

The consultation was promoted in the following ways:

- People on the Housing Needs Register either emailed, texted or written too.
- Housing Tenants – Article in the edition of Tenants’ link and attendance at 3x groups organised by the tenant Engagement Team
- Social housing landlords
- Social Media
- Nextdoor
- eBulletin
- Internal All Staff Bulletin
- Housing Internal Bulletin
- Tenants’ Link

All questionnaire results have been analysed and presented in graphs within this report. Respondents were also given opportunities throughout the questionnaire to provide written feedback on the proposals. All written responses and questionnaire comments have been read and then assigned to categories based upon sentiment or theme.

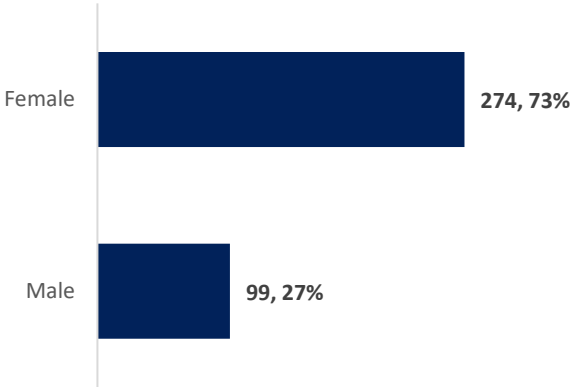


Total responses

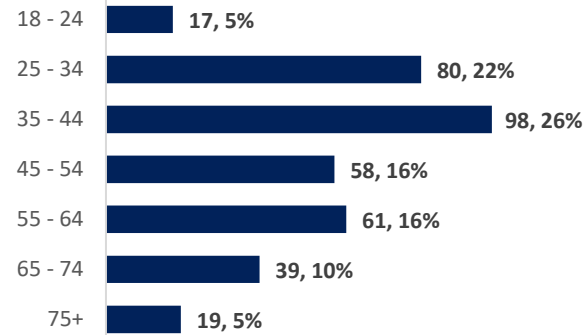
411 survey responses
17 email/letter responses
428 total

Graphs on this page are labelled as percentage (count).

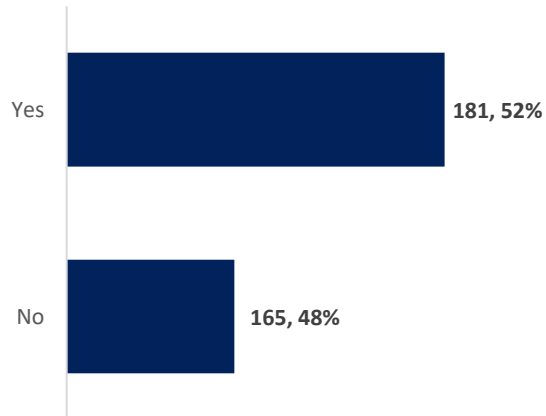
Sex



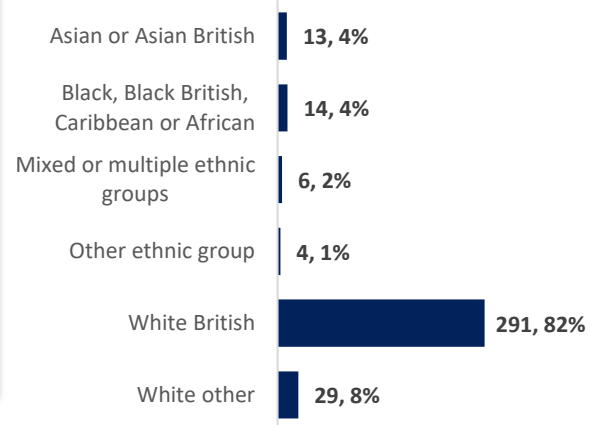
Age



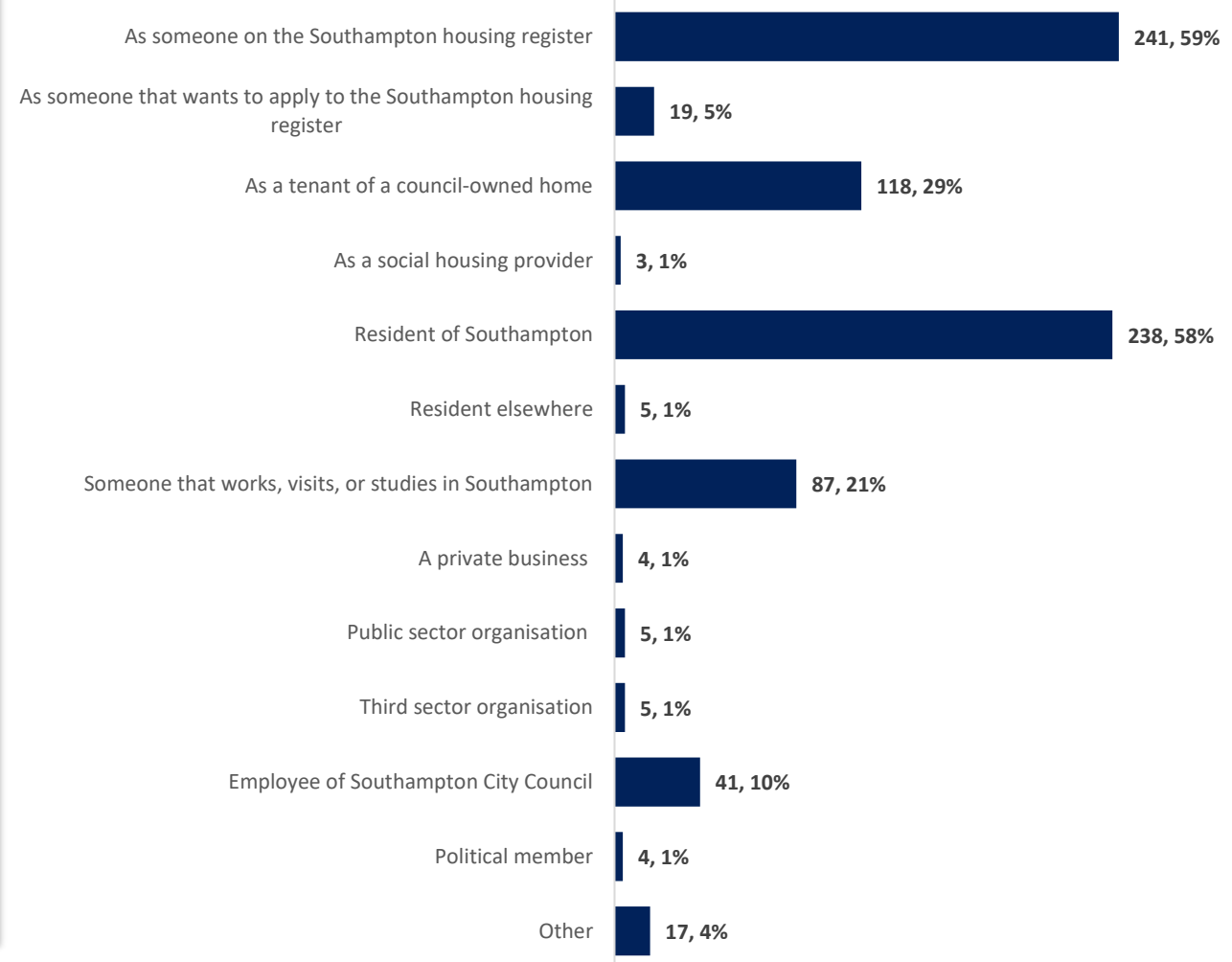
Disability



Ethnicity



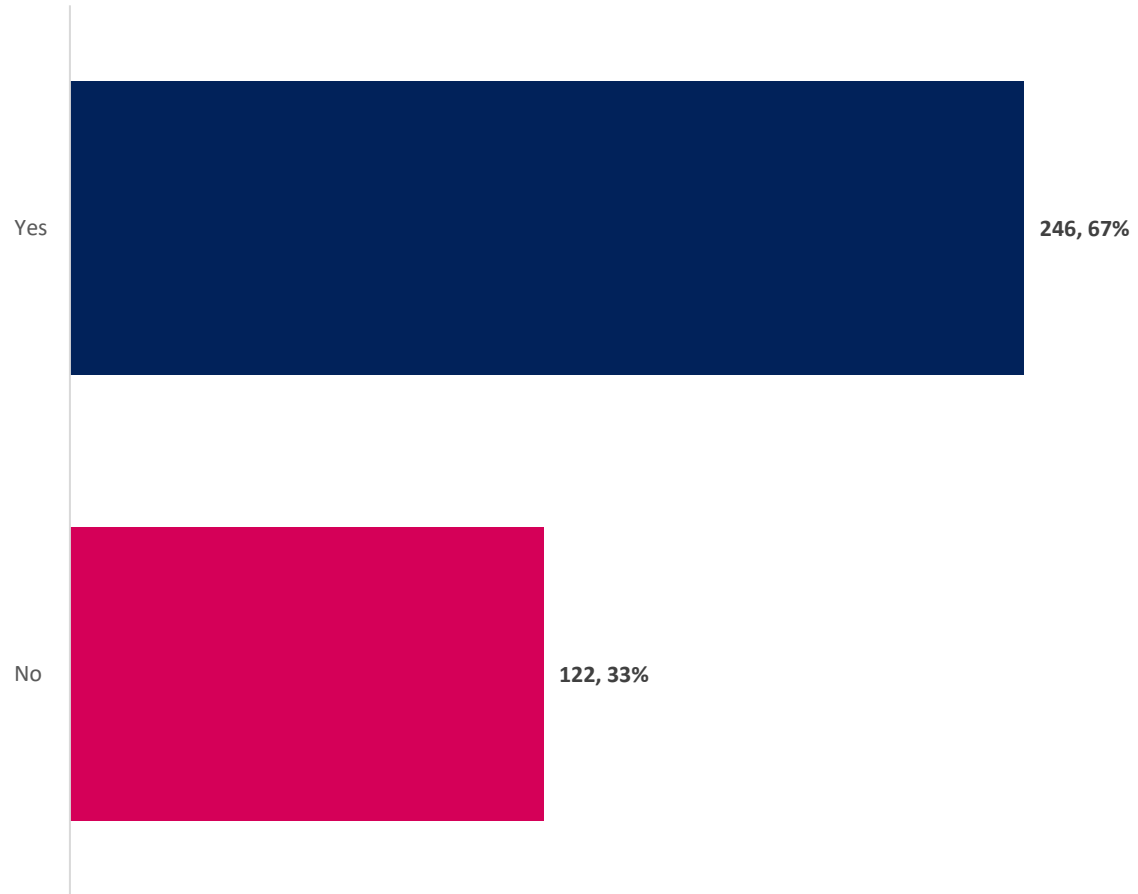
Interest in the consultation





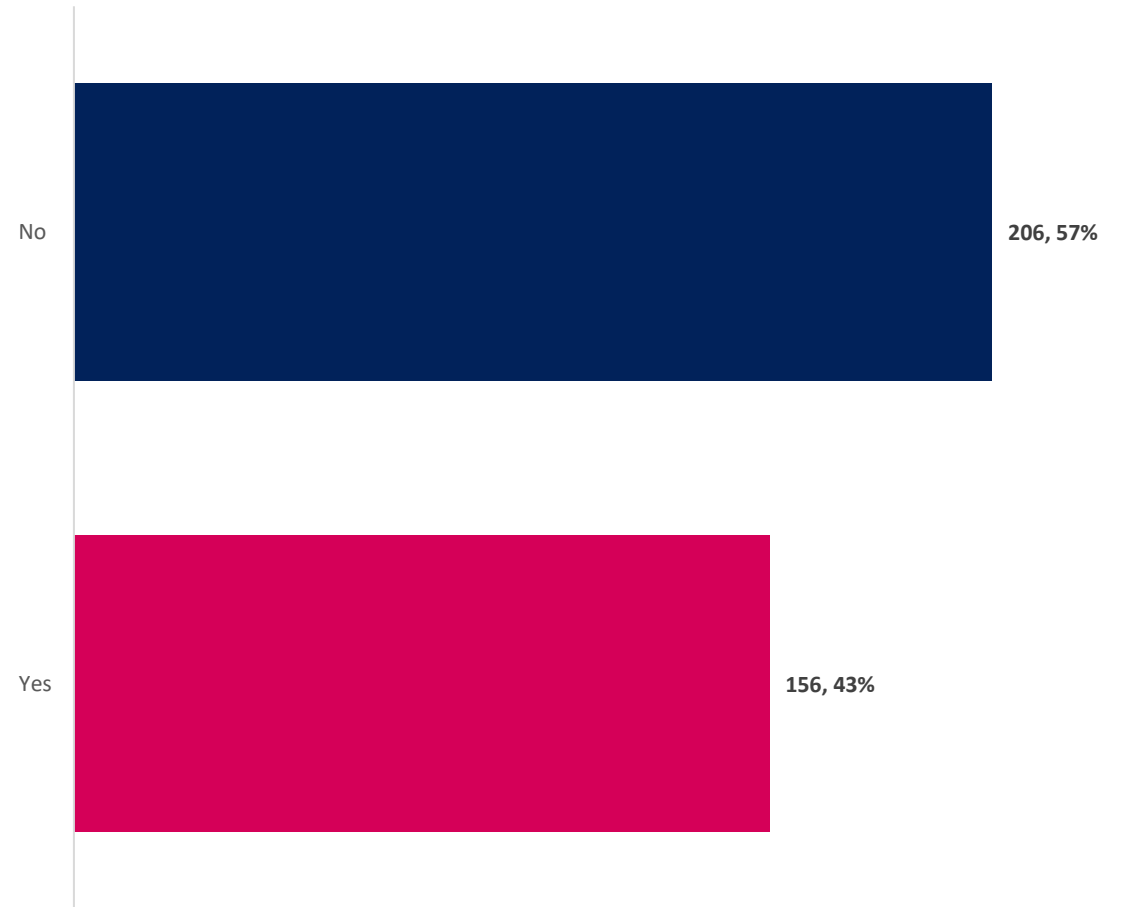
Question | Are you currently on the Southampton Housing Register?

Total responses | 368



Question | Are you currently a tenant of a council-owned home?

Total responses | 362





Consultation feedback

Proposal to replace a point-based scheme with a banding scheme



Proposal to replace a point-based scheme with a banding scheme

Current policy:

Currently, the council allocates social housing using a points-based system. Applicants receive a certain number of points based upon their circumstances, and then also receive one point per month for waiting.

Proposed changes:

We are proposing to replace the point-based system with a banding scheme. The banding scheme would start from Band A (highest level of priority) down to Band D. Applicants would be placed into bands according to their circumstances and the degree of their housing need and those with the highest need will be given the greatest priority. We are not proposing any changes to who is eligible to join the Housing Needs Register itself.

The reason for proposing this change, is to ensure that those with the highest need for housing are given the highest priority. It should make the process simpler to understand, easier to administer and is also a system that is used more widely by other councils.

Under the proposed scheme, the tiebreaker for separating two applicants with the same band will be the date they were awarded the band (or when they would have been assigned to that band in the past if we had always used a banding system). If two applicants have the same band date, the tiebreaker will be the date they first qualified for the Housing Needs Register.

The following table sets out what each band includes:

Band	Band name
A	1. Urgent housing needs: A life-threatening illness or sudden disability
	2. Urgent housing needs: Social housing tenants at risk of violence or threats of violence, including intimidated witnesses, and those escaping serious antisocial behaviour or domestic abuse. The tenant's landlord must decide whether they are required to move for these reasons. Private tenants, owner-occupiers and those with no housing will be referred to the council's Homelessness service.
	3. Under occupation: Social housing tenants who are giving up 3+ bedroom social housing.
	4. Efficient use of Housing Stock: Giving up a wheelchair-accessible or extensively adapted home which is no longer needed.
	5. Decant: Council tenants whose home is part of a regeneration scheme.
	6. Decant: Council tenants whose home is being permanently disposed of (e.g. due to disrepair).
B	1. Main Homeless Duty: The applicant is owed the main housing duty under s.193(2) of the Housing Act 1996 and is ready to move on from temporary accommodation.
	2. Under occupation: Giving up 2-bedroom social housing which is no longer needed.
	3. Efficient use of Housing Stock: Giving up ground-floor social housing which is no longer needed.
	4. Care Leavers Move – On: A young person who has been looked after, fostered or accommodated by the council and is now ready for independent living.
	5. Applicants with two or more categories in Band C2-C4.
C	1. Homeless Prevention or Relief Duty: Applicants owed the prevention or relief duties under Part VII of the Housing Act 1996.
	2. Applicants occupying insanitary, overcrowded, or unsatisfactory housing conditions.
	3. Medical /welfare need: Applicants with an assessed welfare reason to move home, including grounds related to a disability.
	4. Hardship: Applicants who need to move to a particular locality in Southampton to avoid hardship to themselves or others.
	5. Right to Move: Any social housing tenant in England who needs to move to Southampton under the Right to Move regulations.
D	1. Intentionally Homeless: Applicants who are homeless within the meaning of Part VII of the Housing Act but who are considered to be intentionally homeless.
	2. Housing related debt: Applicants who have housing related debt owed to the council or a social landlord and are not repaying this or do not have a repayment plan agreed.
	3. Care Leavers Not Ready to Move: A young person who has been looked after, fostered or accommodated by the council but is not yet ready for independent living.
	4. Refusal penalty: Applicants who have refused 3 offers of accommodation will be placed in Band D for six months.

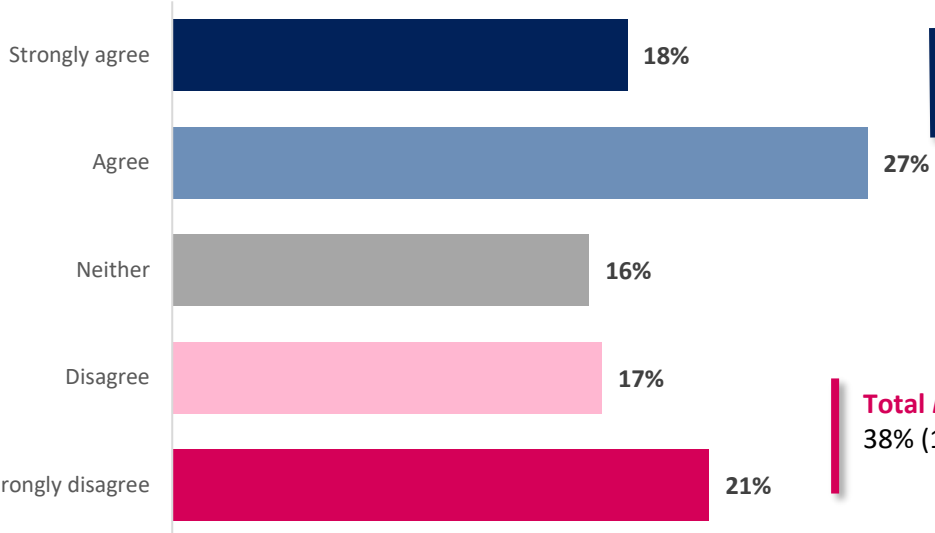


Question 1 | To what extent do you agree or disagree with this proposal?

Total responses | 402

Total agree
46% (183 respondents)

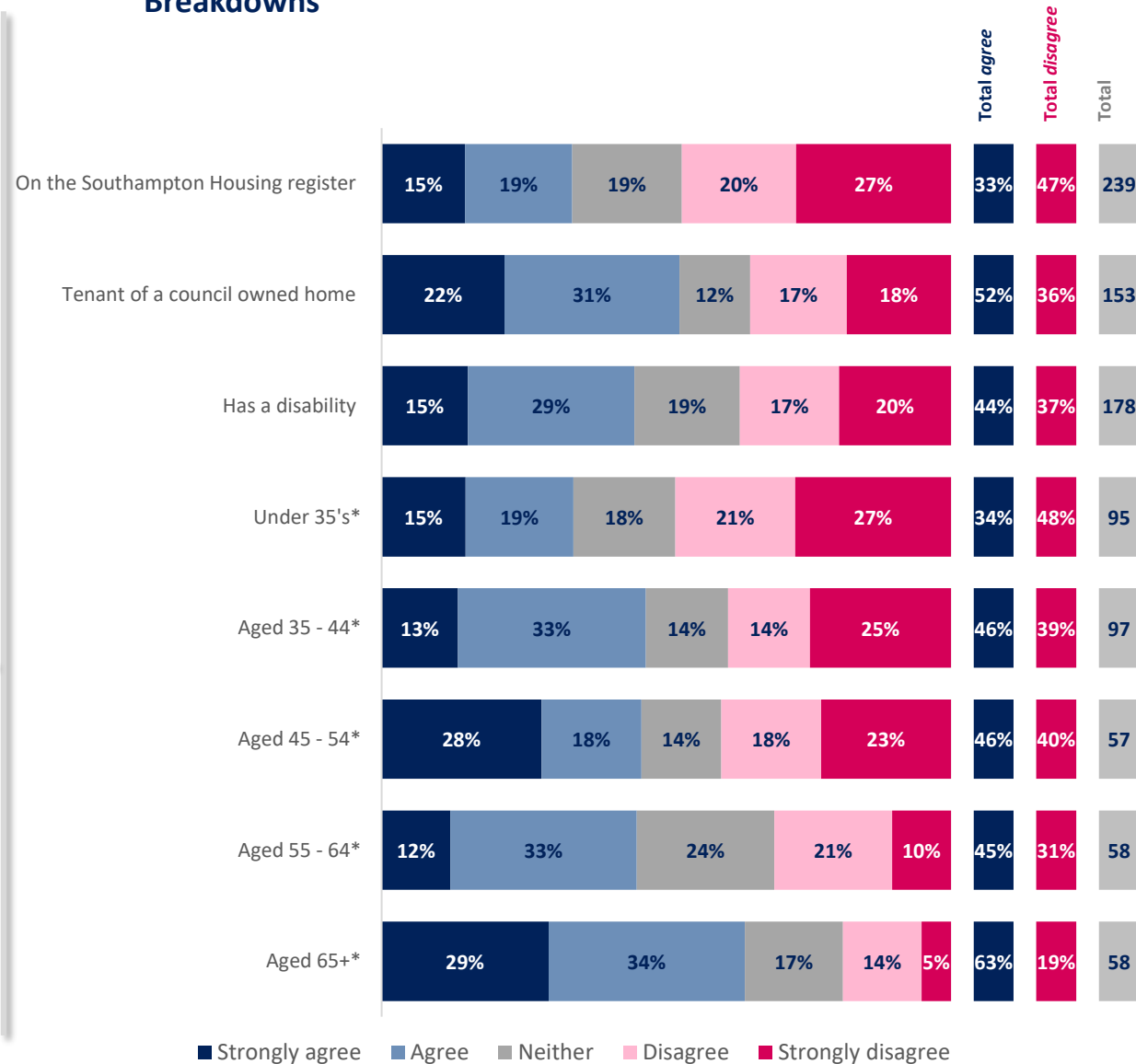
Total Disagree
38% (153 respondents)



Key findings

- Under half of the respondents agreed with the proposal to replace a point-based scheme with a banding scheme (**46%**).
- Those on the **Southampton Housing register** had the highest level of **disagreement with 47%**.
- Those **aged 65+** had the highest level of **agreement with 63%**.

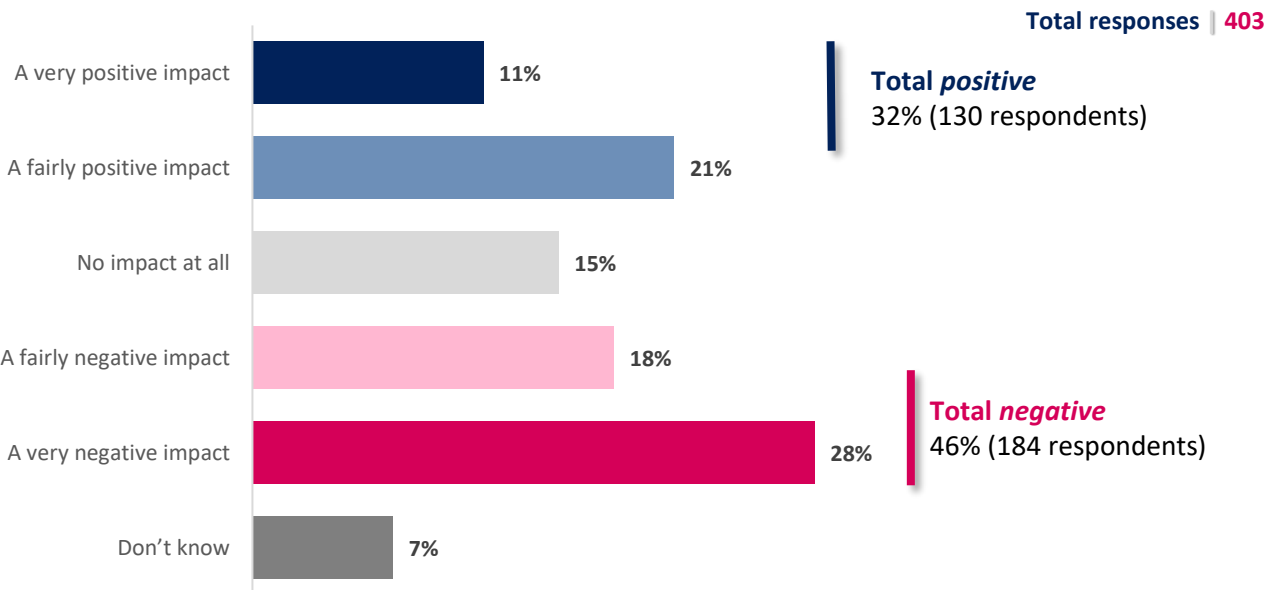
Breakdowns



*Less than 100 respondents; **less than 50 respondents.



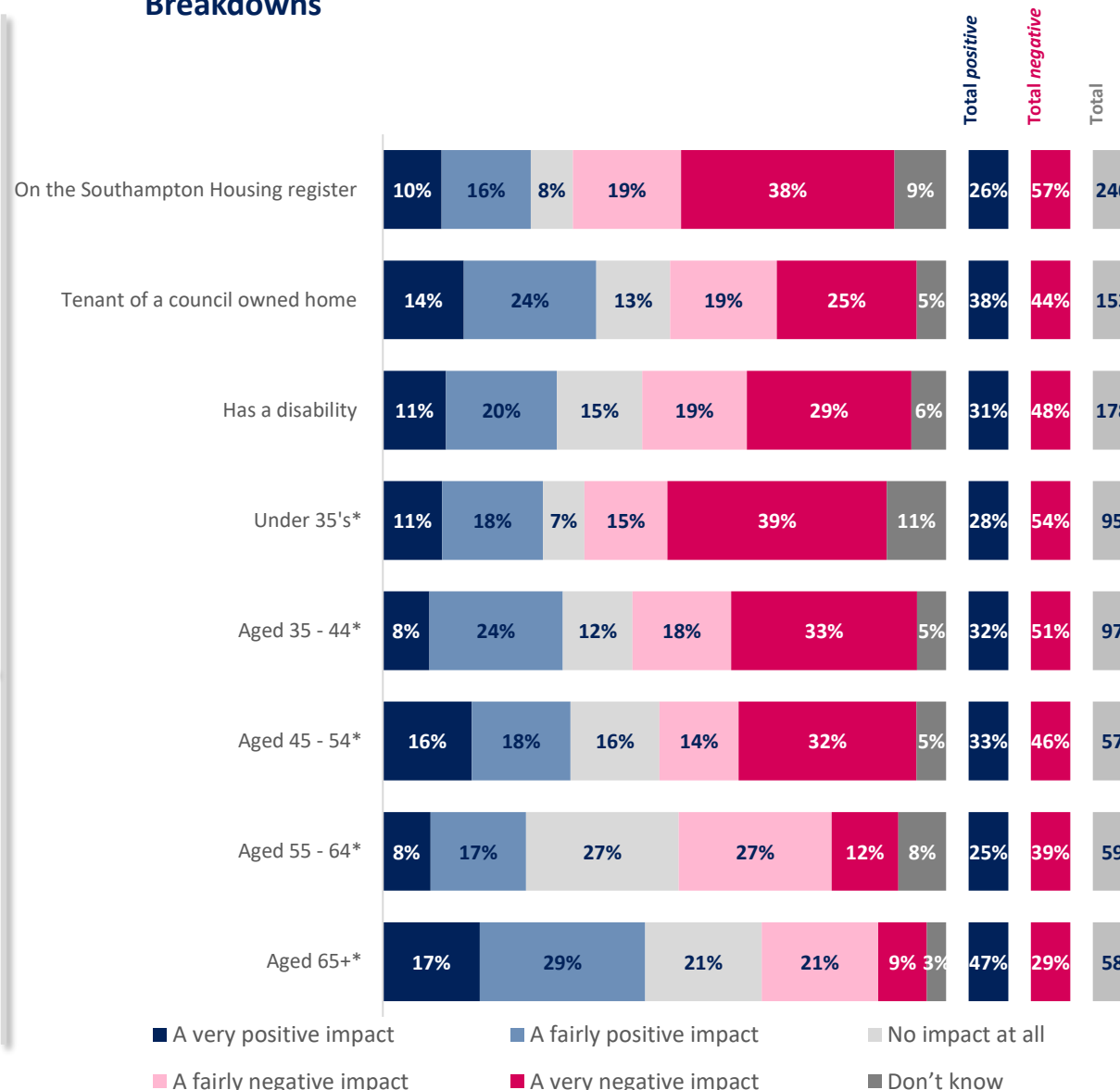
Question 2 | What impact do you feel this may have on you, your family or the wider community?



Key findings

- 46% of respondents said this proposal would have a **negative impact**.
- Those **under the age of 35** found this proposal to have the **most negative impact (54%)** compared to other age groups.
- Those currently a **tenant of a council owned home** found replacing a point – based scheme with a **banding scheme** to have more a **positive impact (38%)** than those on the **Southampton Housing register (26%)**.

Breakdowns



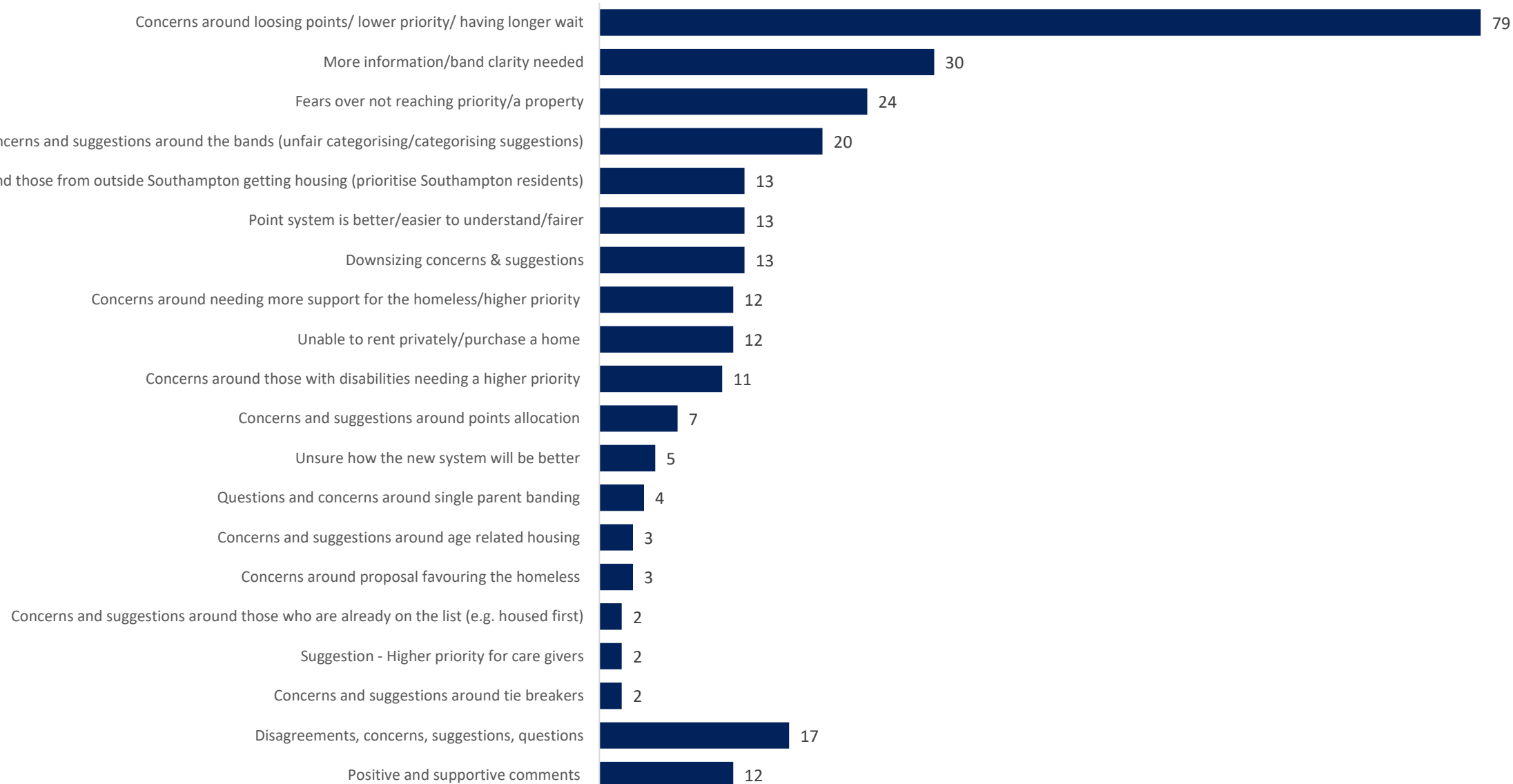
*Less than 100 respondents; **less than 50 respondents.



Total comments | 201

Proposal to replace a point-based scheme with a banding scheme

Total comments





Consultation feedback

Proposed changes to the number of offers an applicant can refuse



Current policy:

Applicants use the Homebid site to view available properties and make bids for homes they are eligible and interested in. If the applicant is offered a property, currently they can refuse as many offers as they would like without penalty.

Proposed changes:

We are proposing that if three suitable offers are refused by an applicant, the applicant will be placed into Band D (the lowest priority band) for a total of 6 months. If a suitable offer is refused a fourth time, the applicant would be removed from the Housing Needs Register.

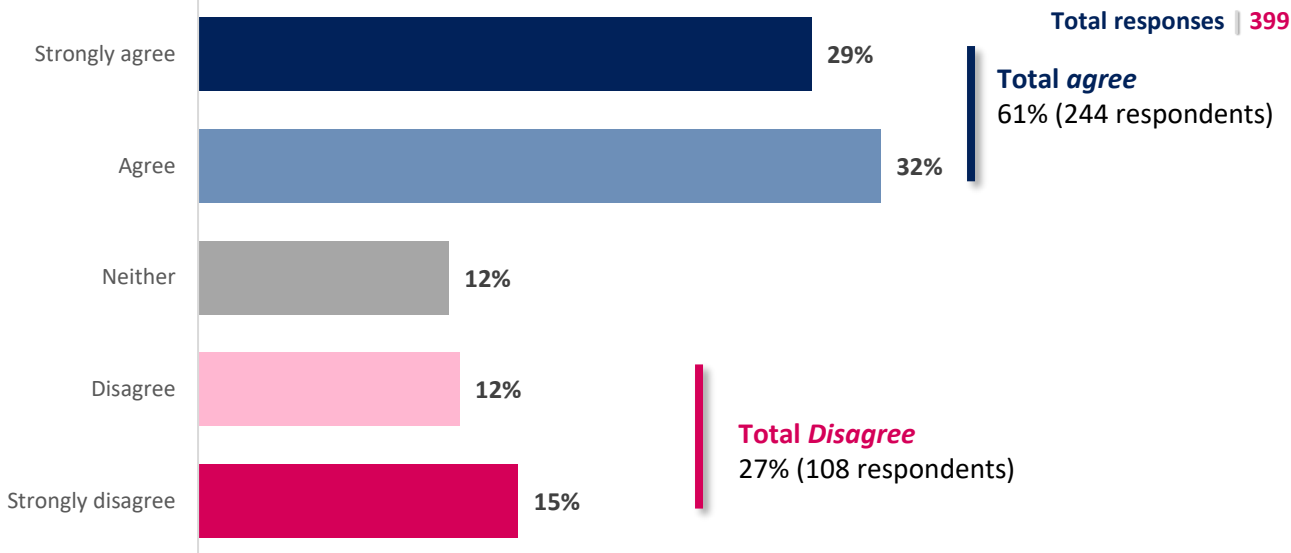
We are proposing these changes as refusal of properties is time consuming for the council and can result in potential rent being lost.

Times when this would not apply include:

- Applicants placed in Band A1 and A2 (those needing to move due to urgent medical or welfare needs and people escaping violence or intimidation), will receive one offer. If this offer is refused, they will be placed back into their previous band. If the applicant did not previously have a band, they will be removed from the Housing Needs Register.
- The Council will continue with the policy that if an urgent Adapted Property Direct Let is refused by an applicant, they will no longer be considered and wait in turn.



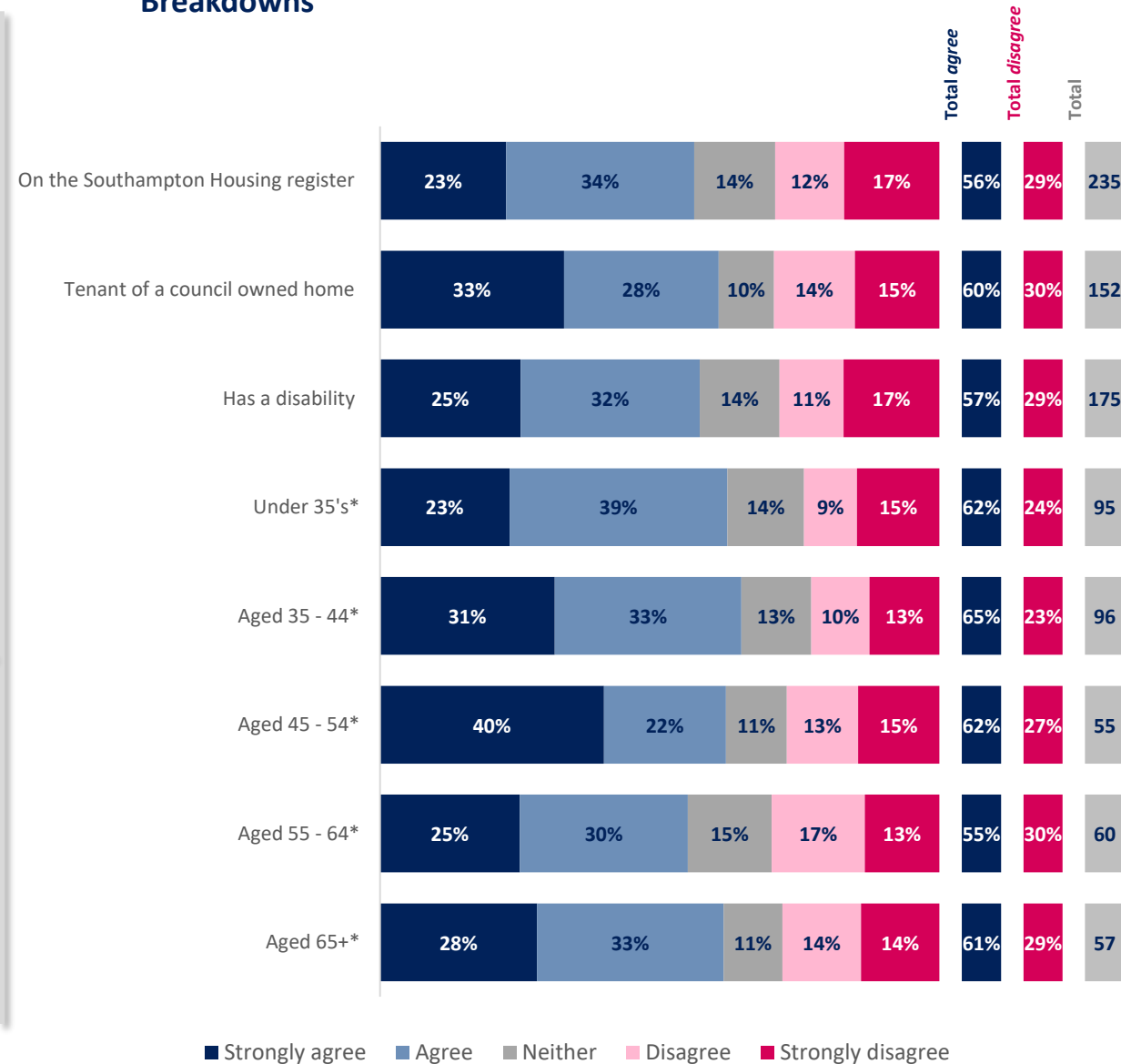
Question 3 | To what extent do you agree or disagree with this proposal?



Key findings

- 61% of respondents agreed with the proposal to change the number of offers an applicant can refuse.
- 56% of those currently on the Southampton Housing register also agreed with this proposal, while 29% disagreed.

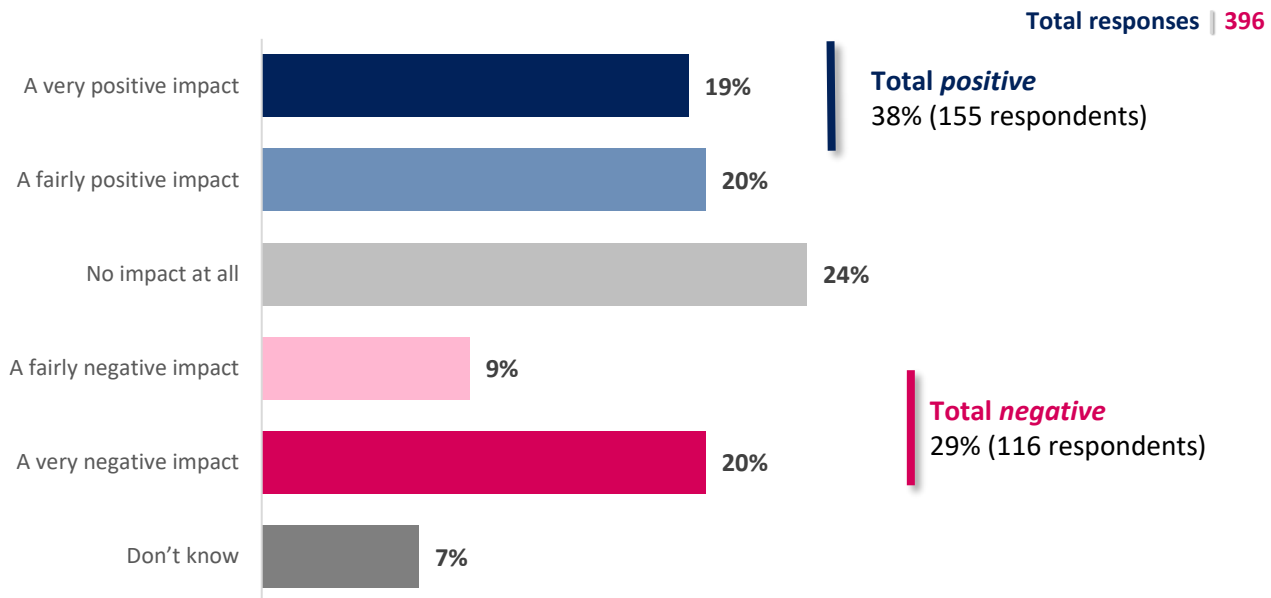
Breakdowns



*Less than 100 respondents; **less than 50 respondents.



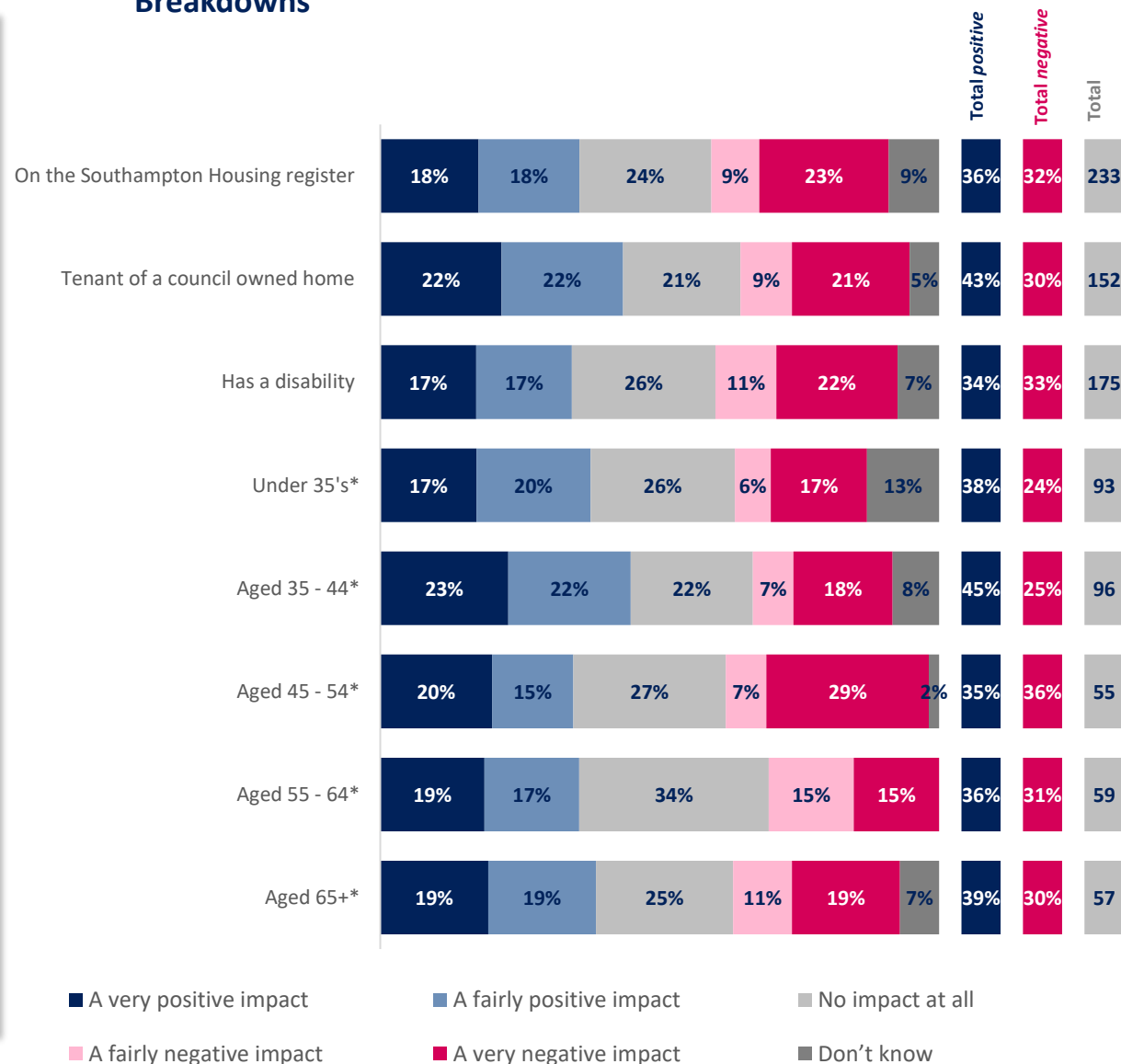
Question 4 | What impact do you feel this may have on you, your family or the wider community?



Key findings

- Respondents were more split in their views on impact, however **38%** said changing the number of offers an applicant can refuse will have a **positive impact**, compared to **29% negative impact**.
- Those with disabilities (**34% positive and 33% negative**) and those aged between **45-54 (35% positive and 36% negative)** were closely divided.

Breakdowns

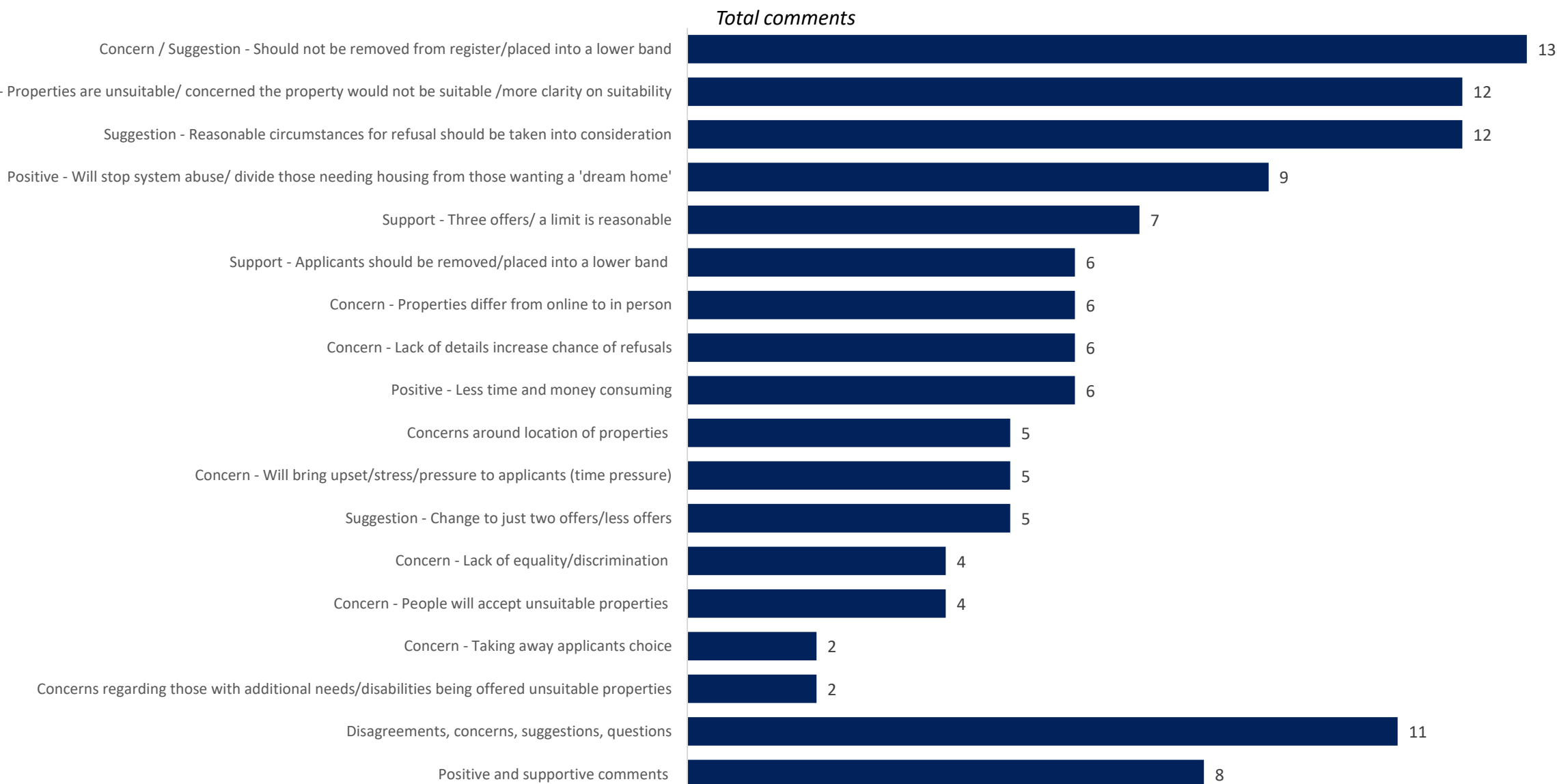


*Less than 100 respondents; **less than 50 respondents.



Total comments | 105

Proposed changes to the number of offers an applicant can refuse





Consultation feedback

Proposed change that allows children to be entitled to their own bedroom from the age of 16



Current policy:

Currently two children of the same sex are expected to share a bedroom regardless of their age gap.

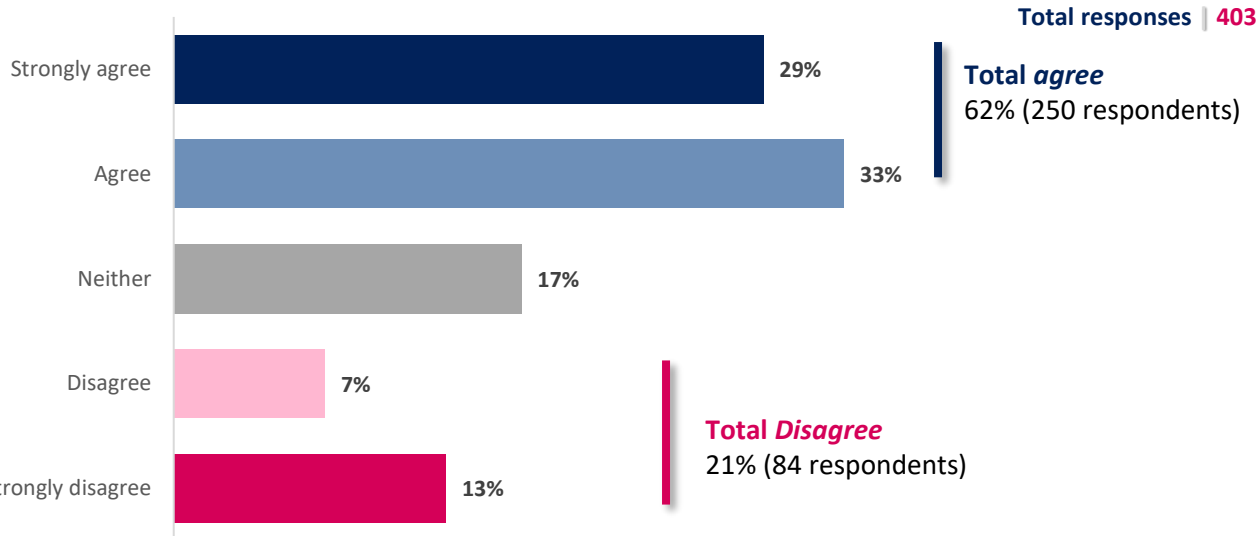
Proposed changes:

We are proposing that children will be entitled to their own bedroom from the age of 16. This mirrors the rules that currently apply to tenants in the private sector, with regard to Housing Benefit and Local Housing allowance regulations.

This may mean that there is a longer wait for larger properties. However, the council can still offer smaller properties to families if they would prefer to move sooner and if this would improve their housing situation.



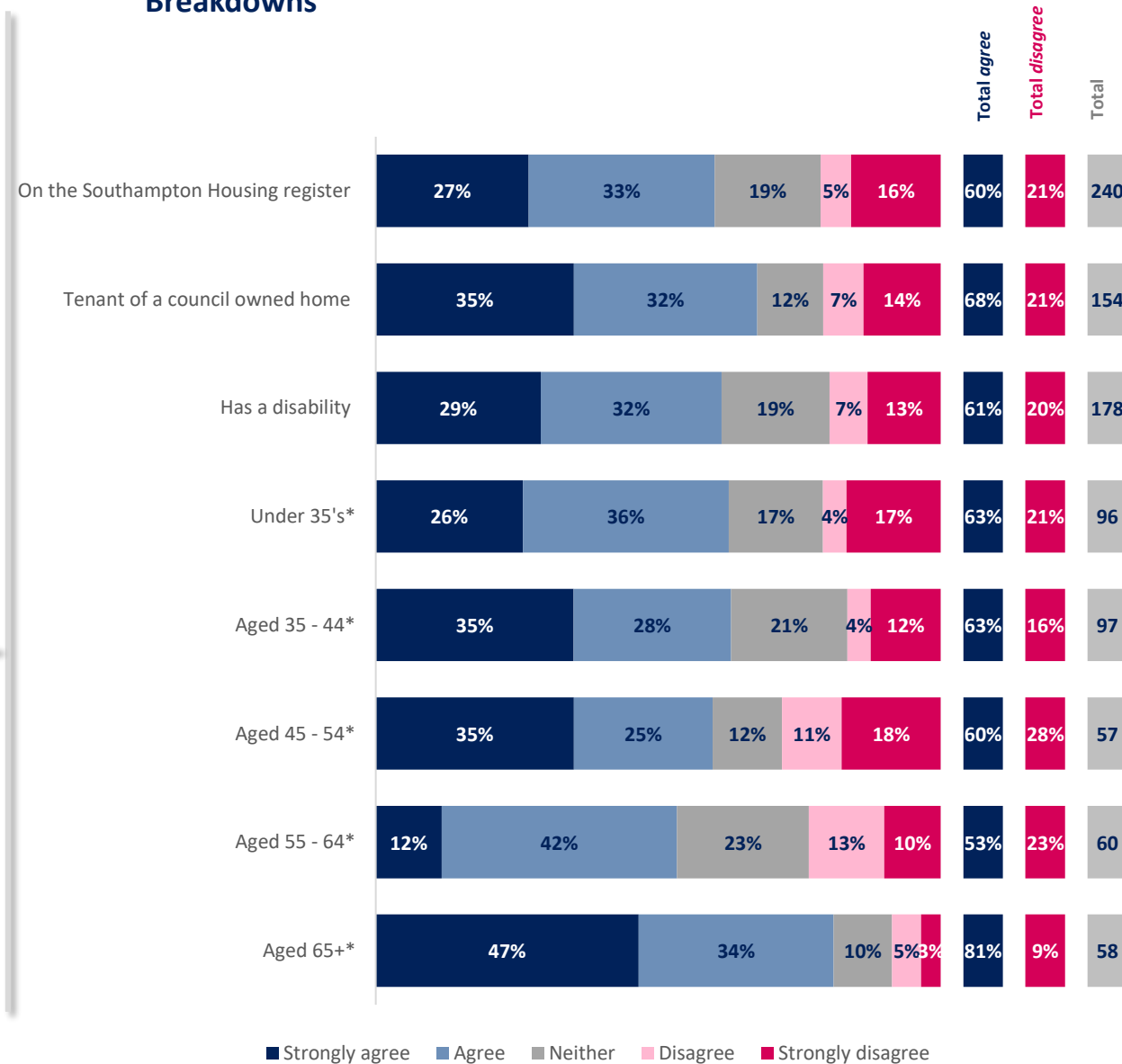
Question 5 | To what extent do you agree or disagree with this proposal?



Key findings

- Respondents had a higher **agreement** for the proposal to allow children to be entitled to their own bedroom from the age of 16 (**62%**).
- All breakdowns had a **larger agreement than disagreement** for this proposal.

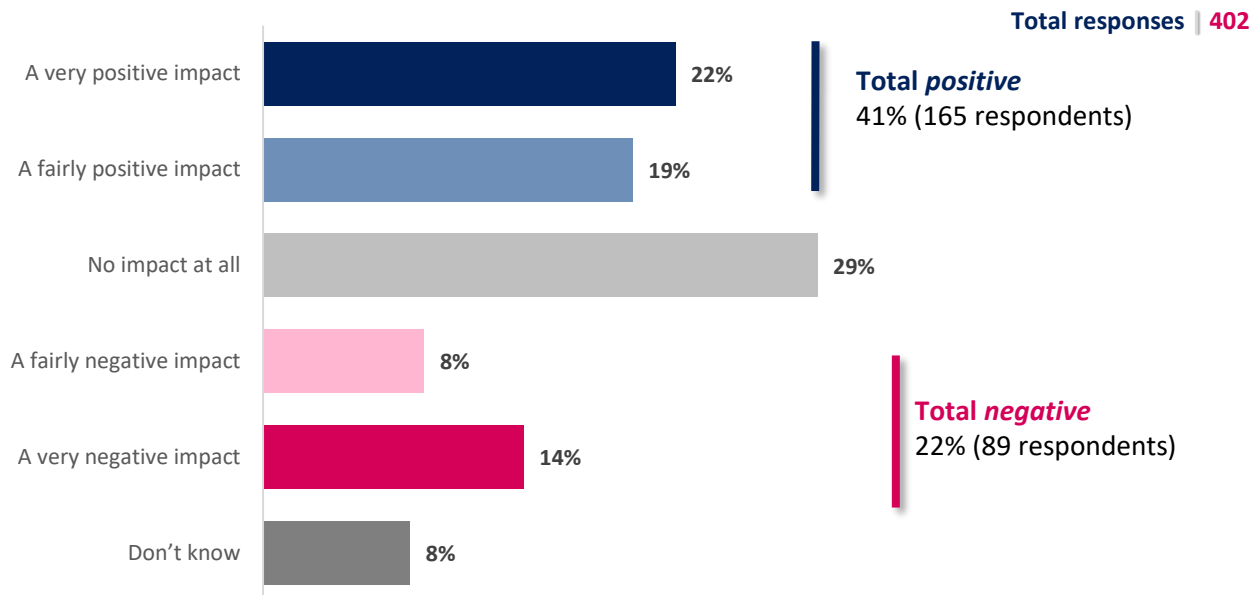
Breakdowns



*Less than 100 respondents; **less than 50 respondents.



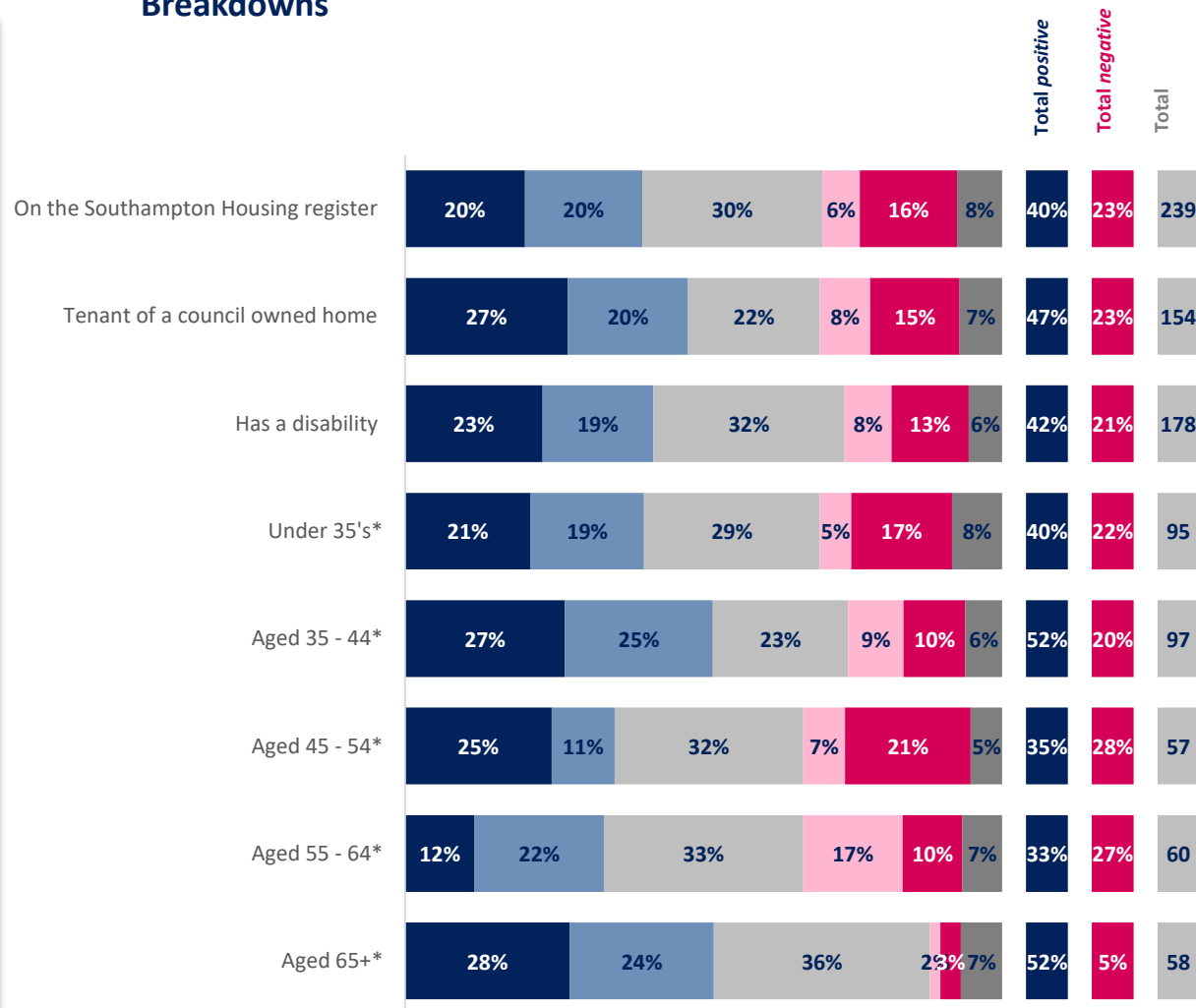
Question 6 | What impact do you feel this may have on you, your family or the wider community?



Key findings

- 29% of respondents said this proposal would have **no impact at all** on them.
- 47% of respondents who are currently a **tenant of a council owned home** said this proposal would have a **positive impact**.

Breakdowns



■ A very positive impact
 ■ A fairly positive impact
 ■ No impact at all
■ A fairly negative impact
 ■ A very negative impact
 ■ Don't know

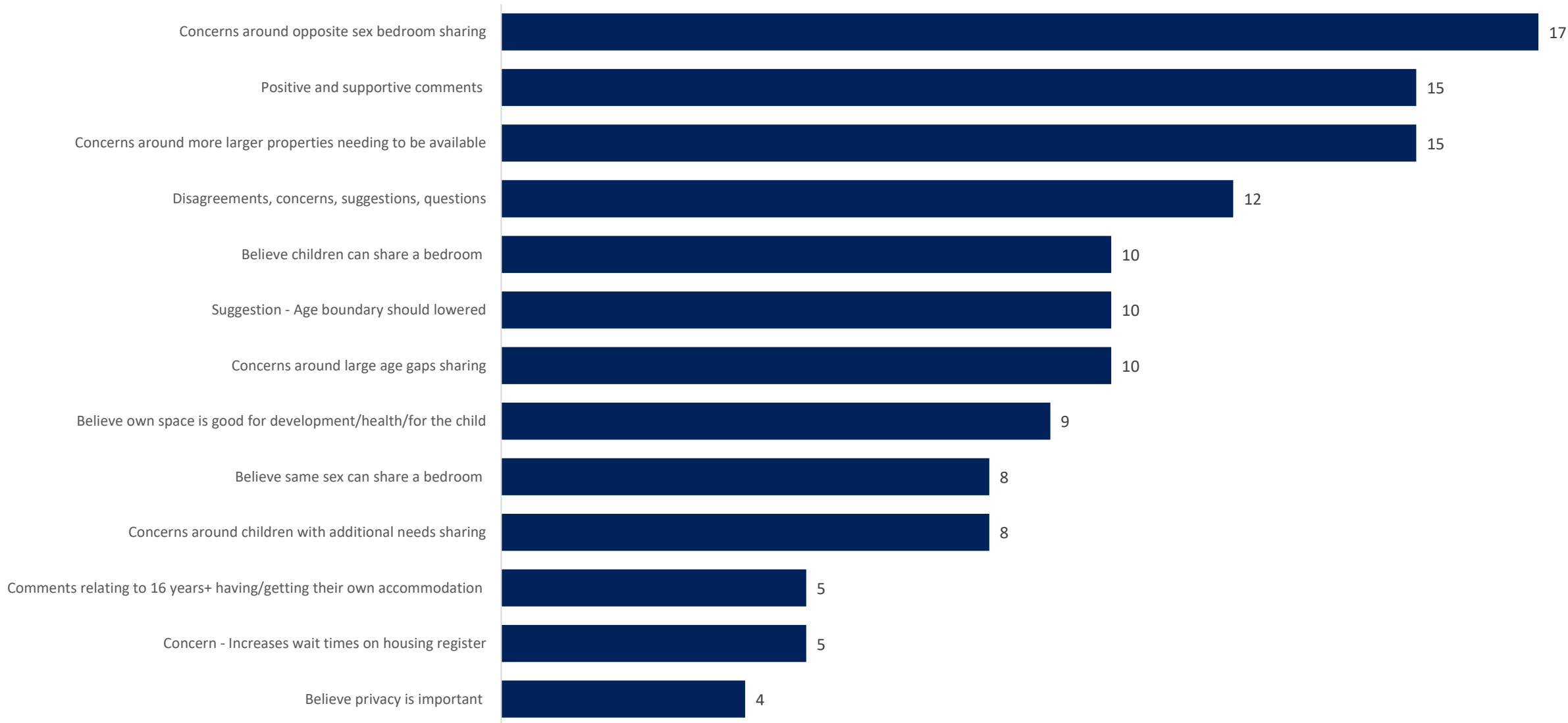
*Less than 100 respondents; **less than 50 respondents.



Total comments | 101

Proposed change that allows children to be entitled to their own bedroom from the age of 16

Total comments





Consultation feedback

Proposed changes to the amount of time an applicant must have lived in Southampton

**Current policy:**

Currently, applicants must have lived in Southampton for three continuous years before they are allowed to be on the Housing Needs Register.

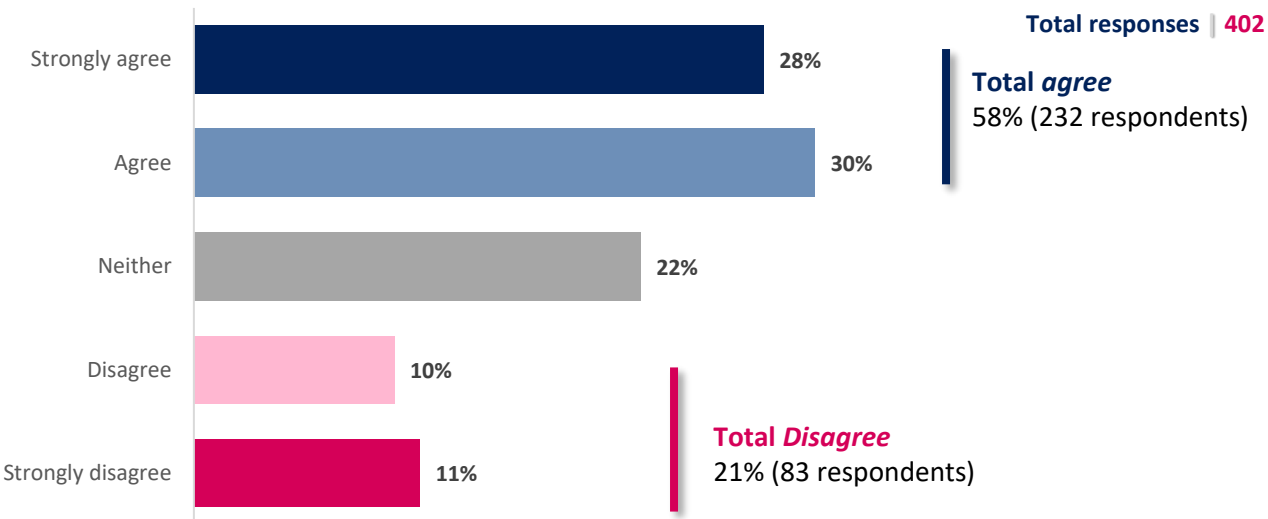
Proposed changes:

We are proposing that applicants can apply to the Housing Needs Register if they have lived in Southampton for three out of the past five years.

This means that those who have had to leave Southampton to find temporary accommodation, would not be excluded from the Housing Needs Register for that reason.



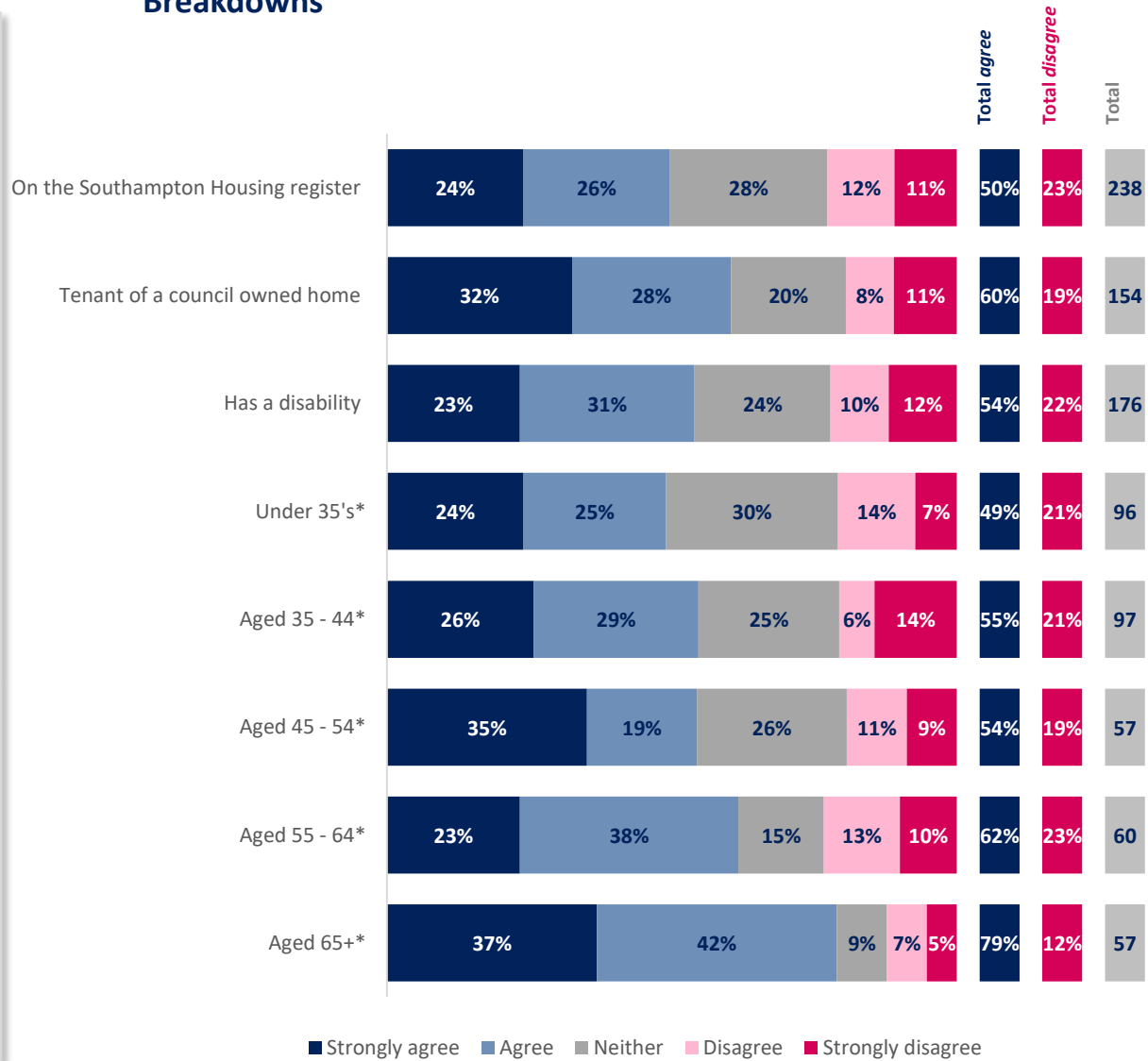
Question 7 | To what extent do you agree or disagree with this proposal?



Key findings

- This proposal was met with **58% of respondents agreeing** to the amount of time an applicant must have lived in Southampton, with **just 21% disagreeing**.
- Just **half (50%)** of the respondents who are **currently on the Southampton Housing register agreed** with this proposal.

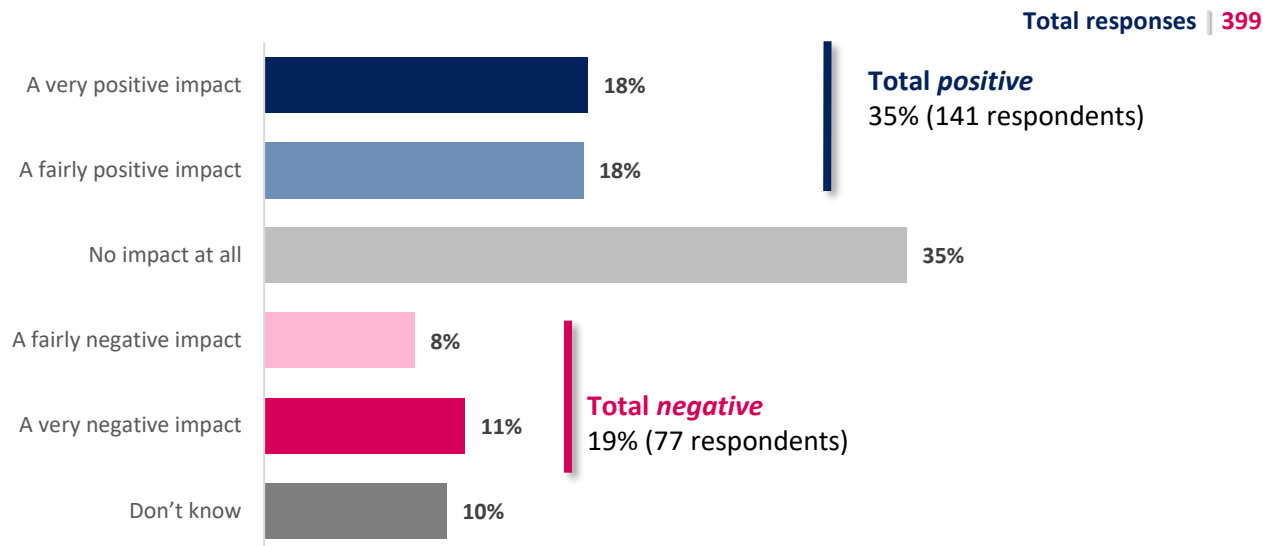
Breakdowns



*Less than 100 respondents; **less than 50 respondents.



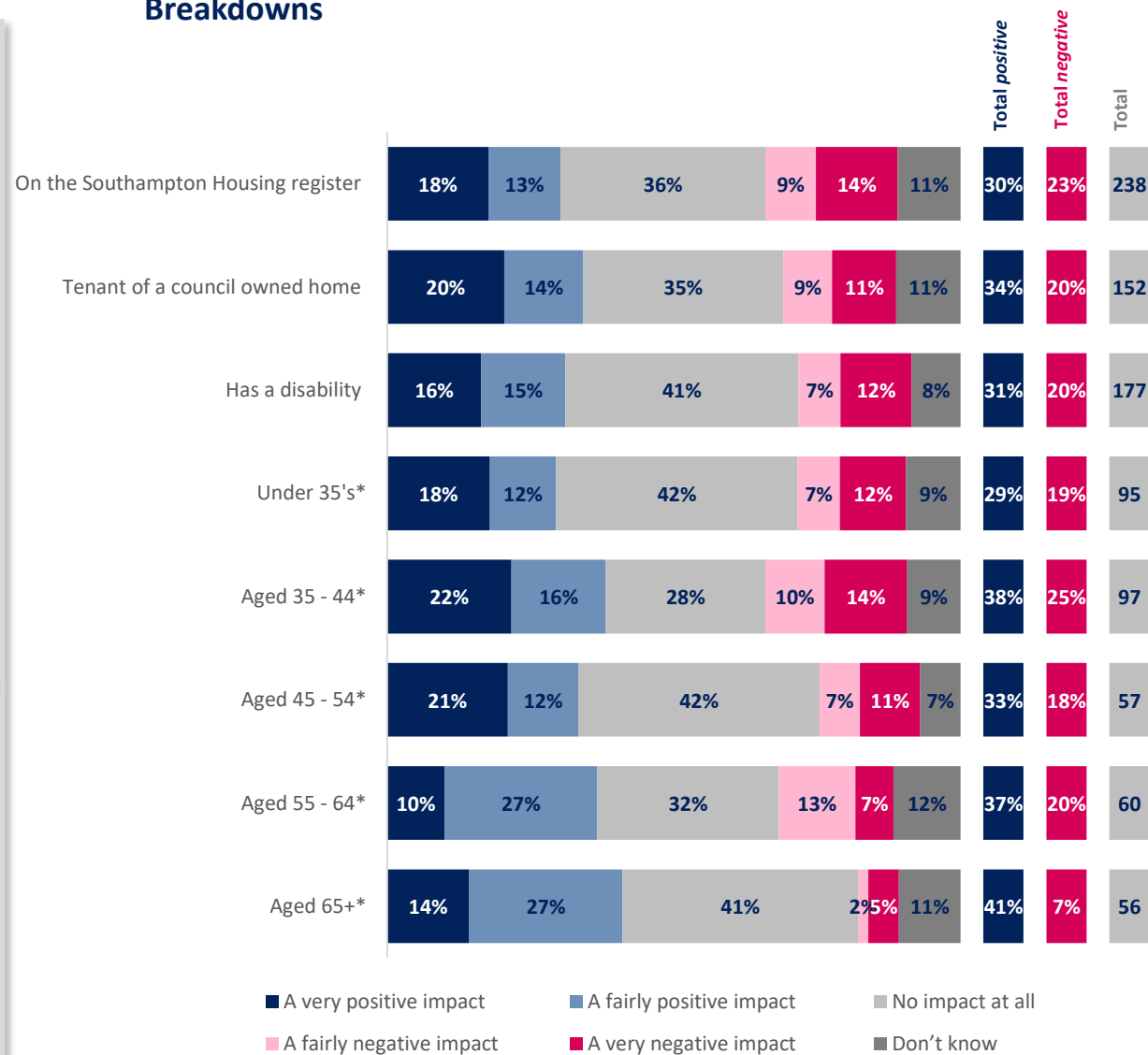
Question 8 | What impact do you feel this may have on you, your family or the wider community?



Key findings

- A large proportion of respondents said this proposal would **have no impact at all (35%)**.
- Those aged **between 35-44 & 65+** had the highest percentages for positive impact (**38% & 41%**).

Breakdowns

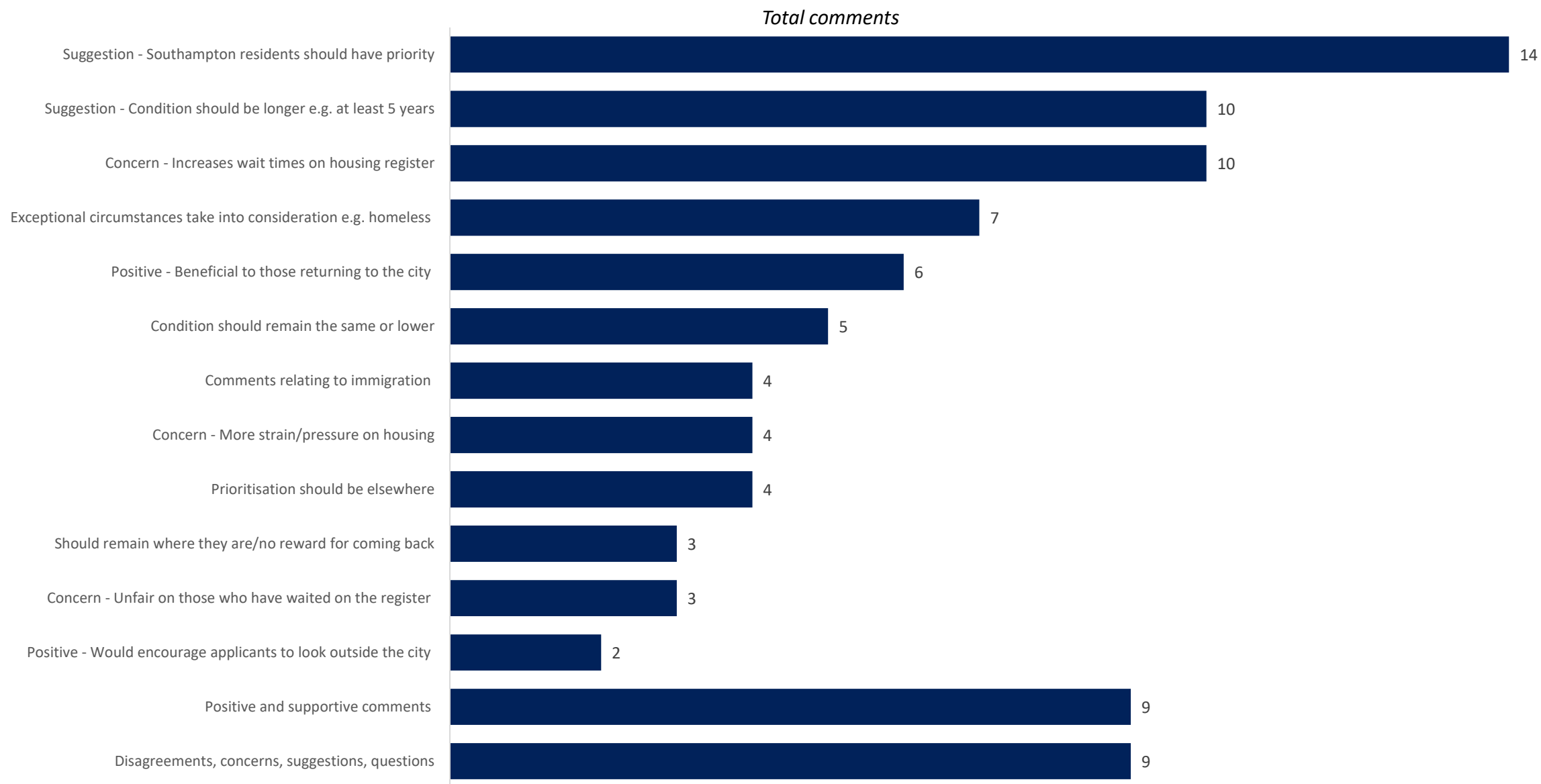


*Less than 100 respondents; **less than 50 respondents.



Total comments | 83

Proposed changes to the amount of time an applicant must have lived in Southampton





Consultation feedback

Proposal to require applicants to re-register every year



Current policy:

Currently, once applicants are accepted onto the Housing Needs Register, they do not have to re-register on an annual basis.

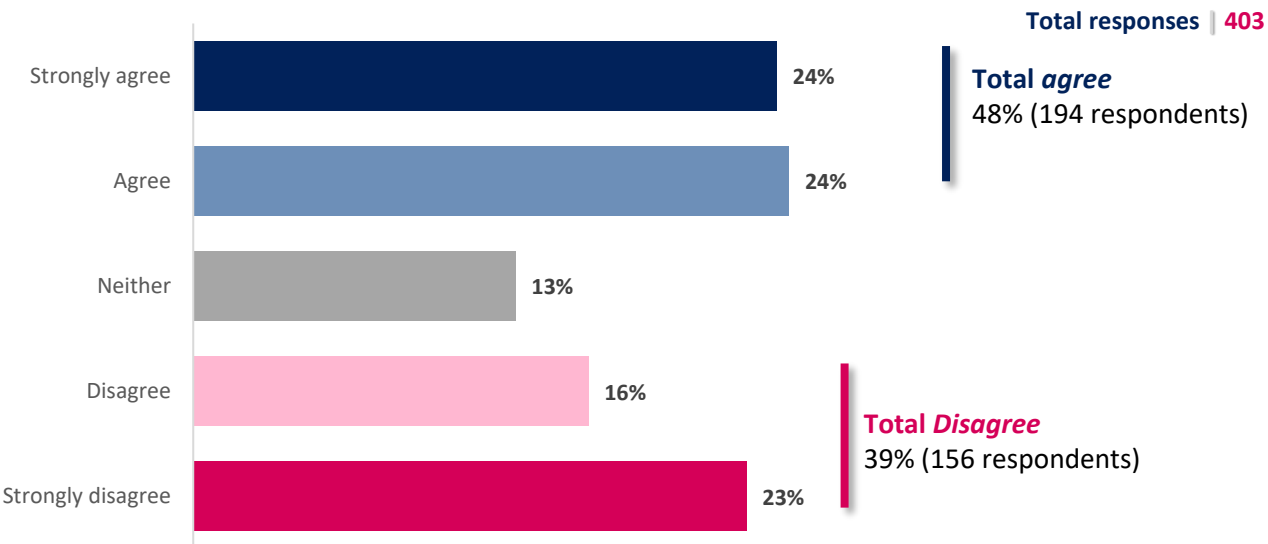
Proposed changes:

We are proposing that all applicants will have to re-register annually. This will confirm whether circumstances have changed and ensure applicants are assigned to the correct band.

For the majority, the process to re-register will include a simpler exercise and not a full new application to be made.



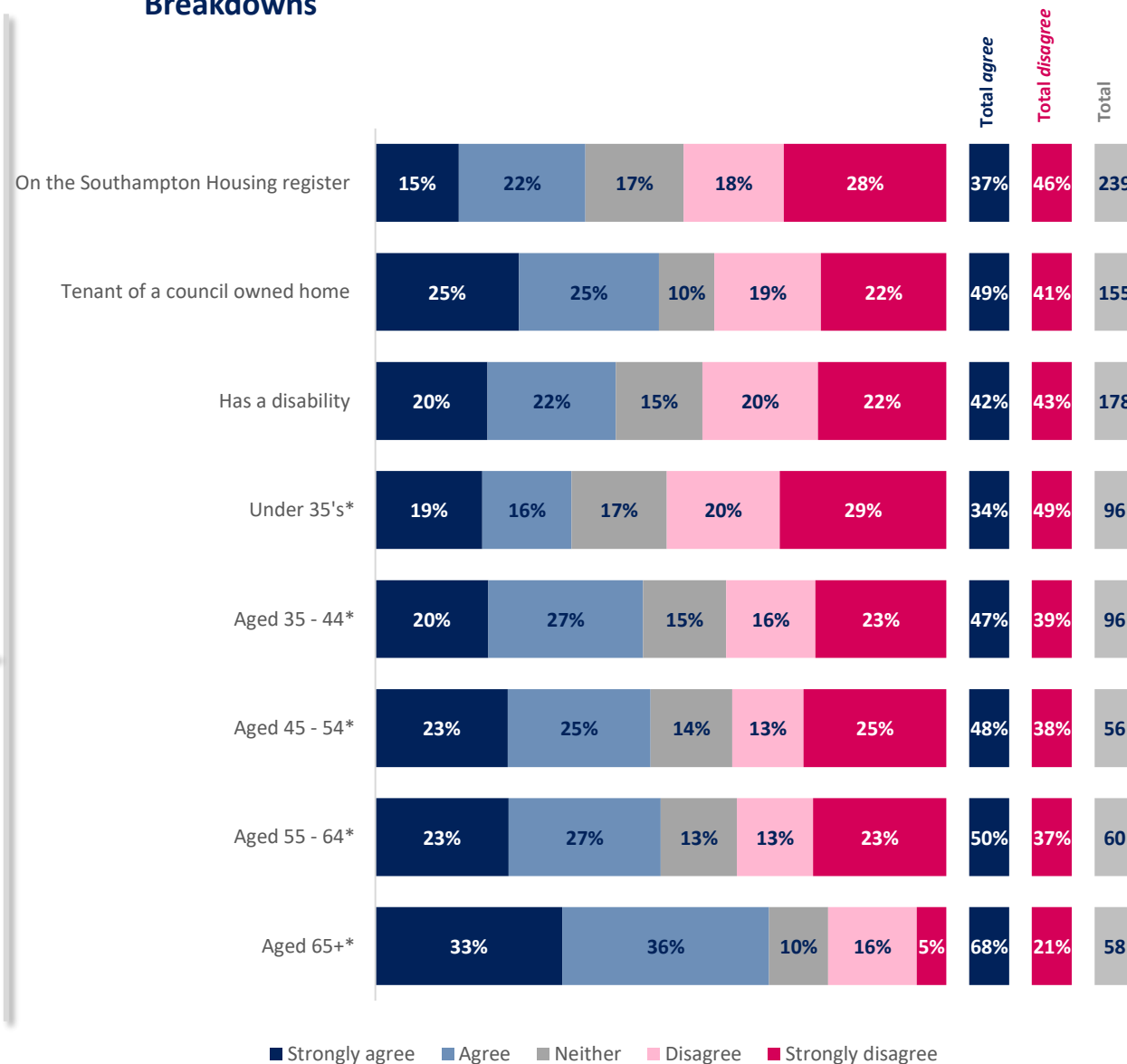
Question 9 | To what extent do you agree or disagree with this proposal?



Key findings

- Again, respondents were split, **24% of respondents strongly agreed** with this proposal while **23% strongly disagreed**.
- Those in the older aged categories (55-64 & 65+) had higher levels of agreement, **50% & 68%**.

Breakdowns

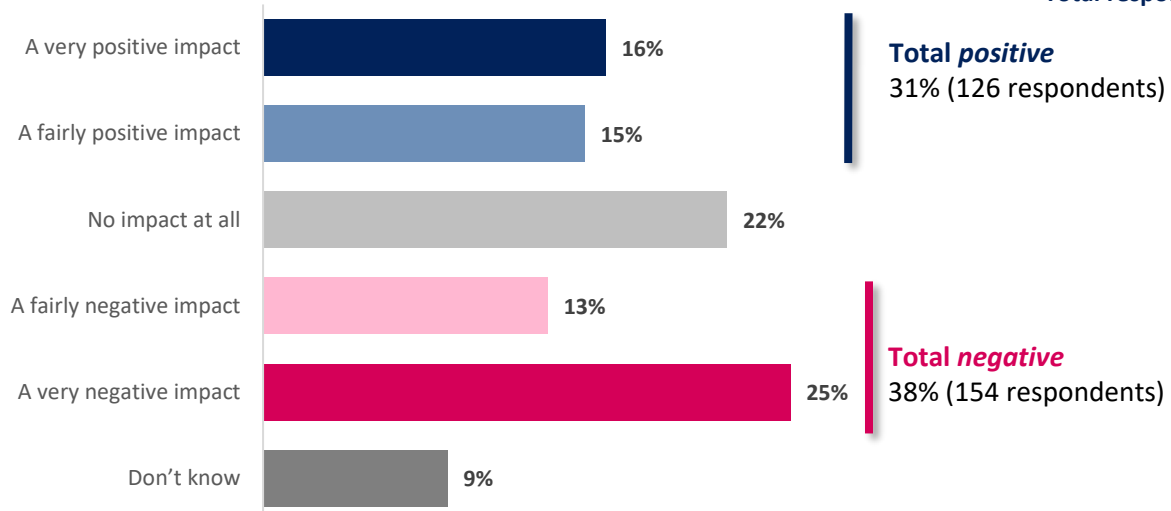


*Less than 100 respondents; **less than 50 respondents.



Question 10 | What impact do you feel this may have on you, your family or the wider community?

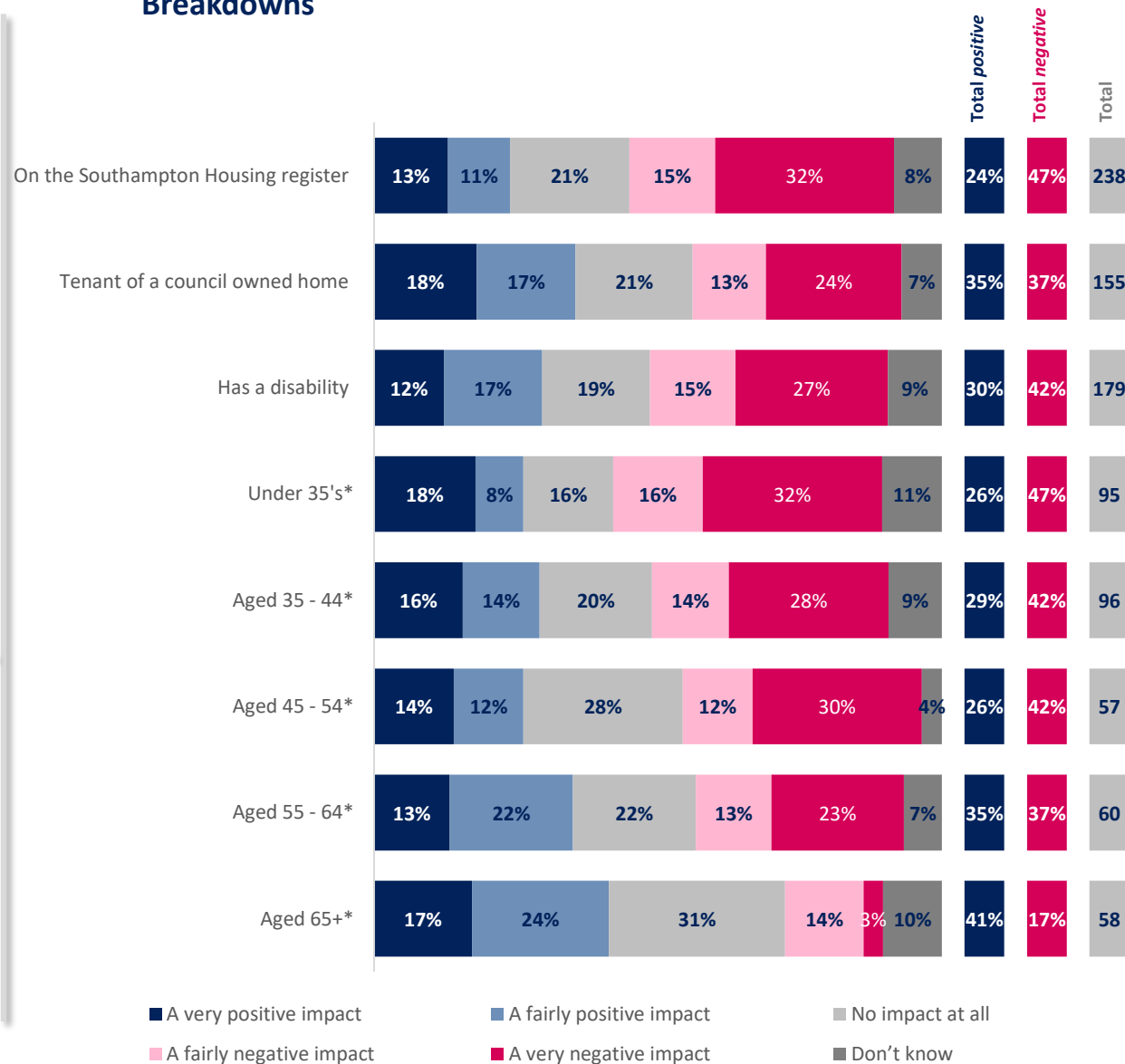
Total responses | 403



Key findings

- A quarter of respondents said the requirement to re-register every year would have a **'very negative impact' (25%)**.
- Those aged 65+ had the highest positive impact for re-registering every year (41%).**

Breakdowns

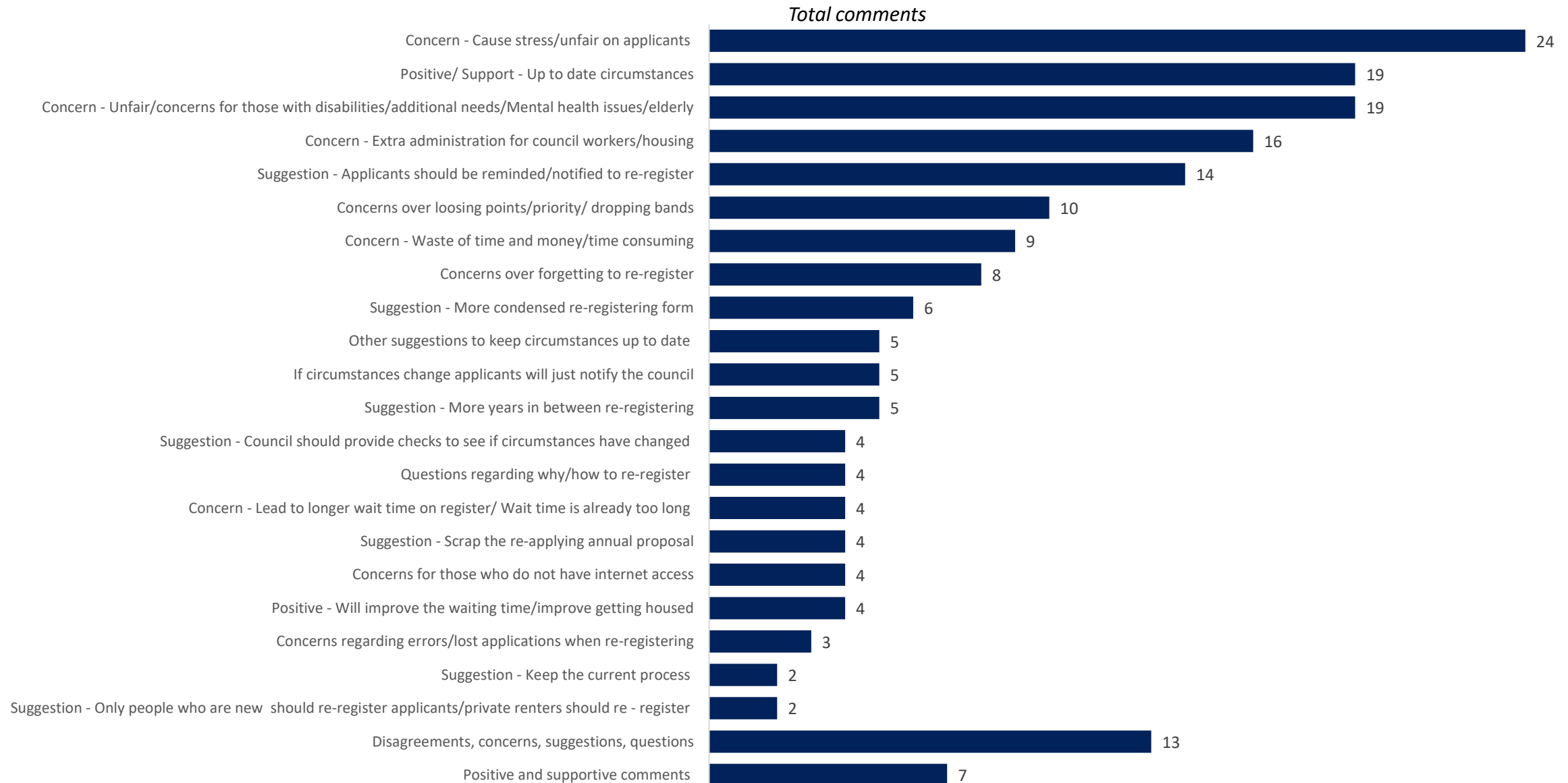


*Less than 100 respondents; **less than 50 respondents.



Total comments | 132

Proposal to require applicants to re-register every year





Consultation feedback

Proposed requirement that existing tenants have an inspection before they move that confirms a property has been kept to an acceptable standard



Current policy:

The council currently consider past management of a tenancy as a factor in deciding whether someone is suitable to be a tenant, but it does not expressly word how this might happen.

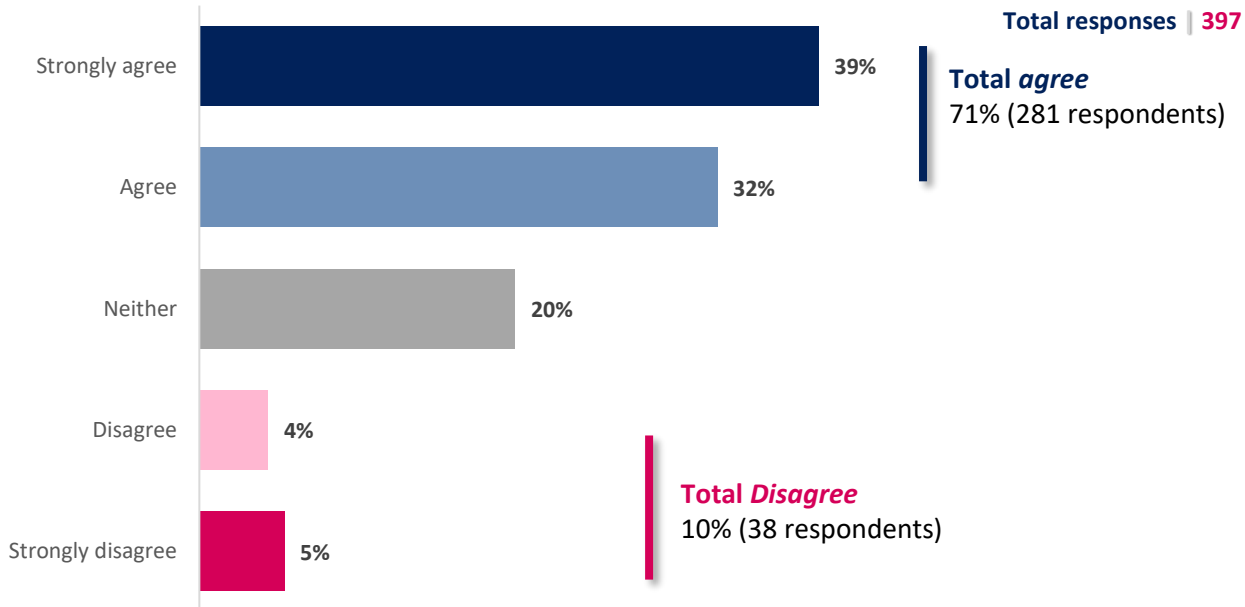
Proposed changes:

This proposal reflects existing practice as it is already a contractual requirement of the tenancy agreement that people will keep their council homes in good order and that access must be granted for periodic tenancy checks by the council. It is also already a requirement in the current allocations policy that the council will consider “past management of a tenancy” as a factor determining suitability. This proposal provides additional clarity that people may have a pre-vacation inspection.



Proposed requirement that existing tenants have an inspection before they move that confirms a property has been kept to an acceptable standard

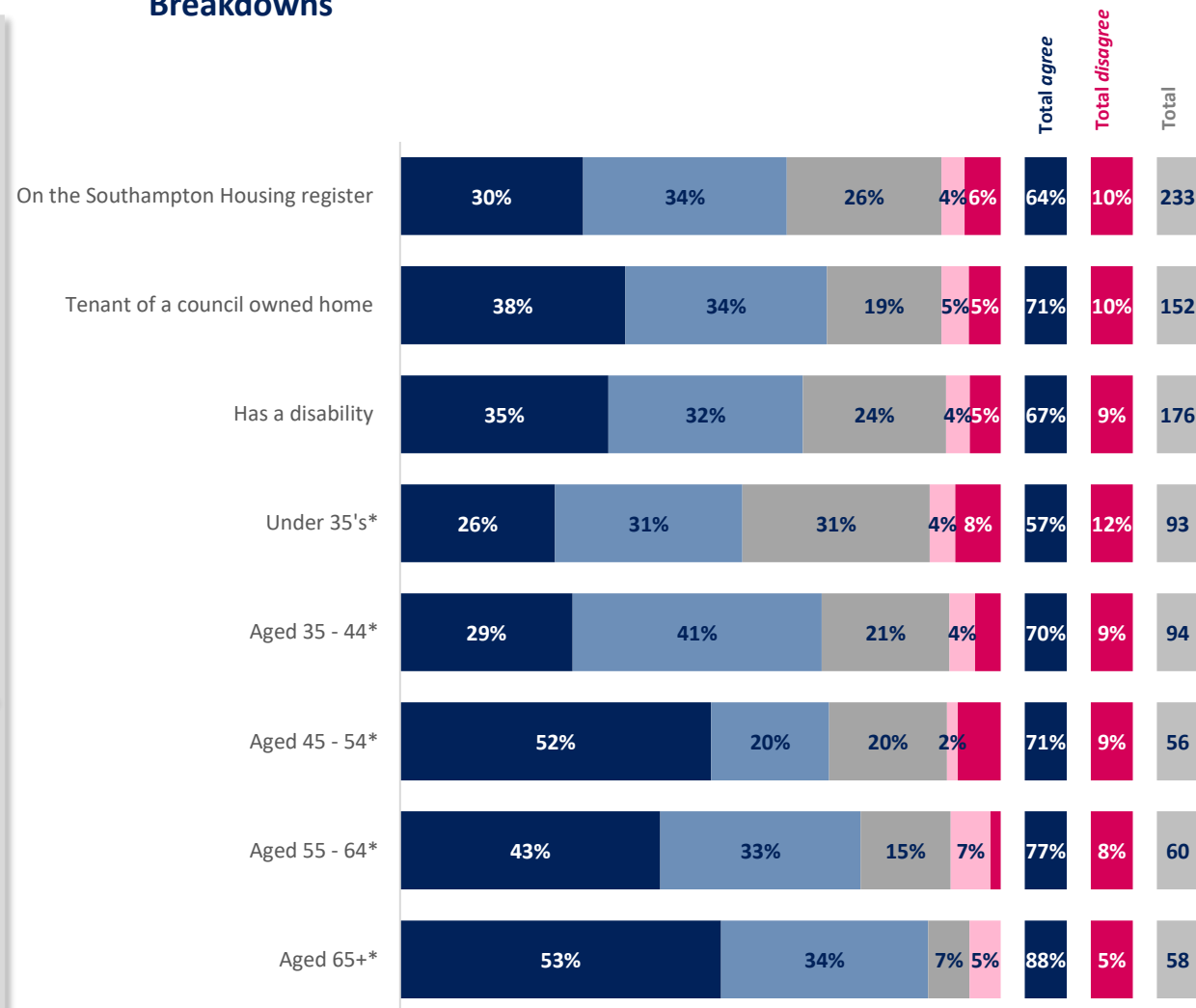
Question 11 | To what extent do you agree or disagree with this proposal?



Key findings

- 71% of respondents agreed with this proposal, while just 10% disagreed.
- All breakdown groups largely agreed with the proposal for existing tenants to have an inspection before they move.

Breakdowns



Legend: Strongly agree (dark blue), Agree (medium blue), Neither (grey), Disagree (light pink), Strongly disagree (red), Total agree (dark blue), Total disagree (red), Total (grey)

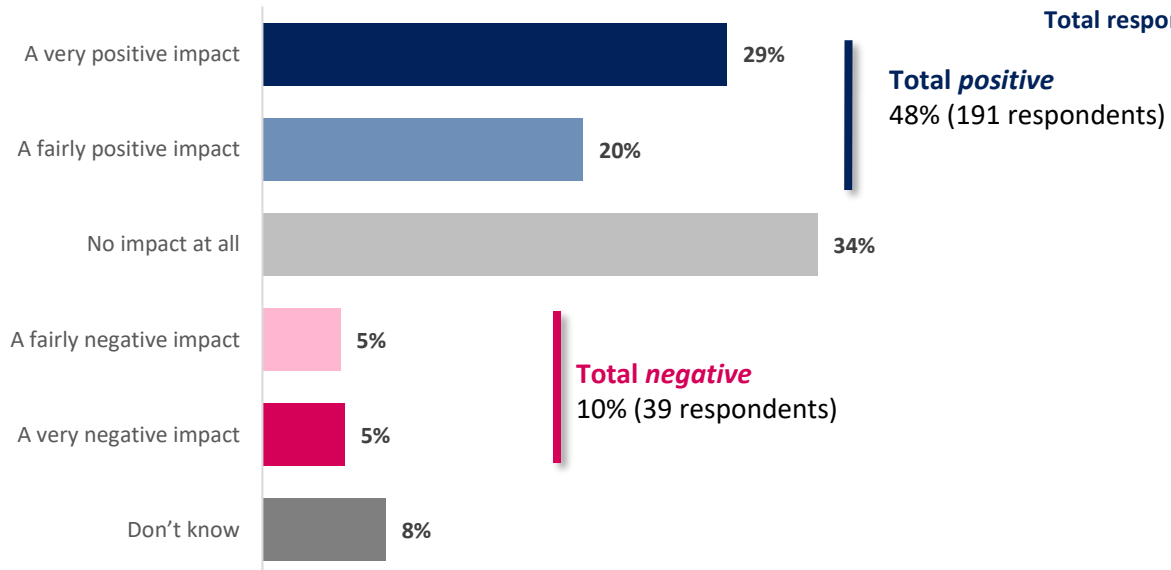
*Less than 100 respondents; **less than 50 respondents.



Proposed requirement that existing tenants have an inspection before they move that confirms a property has been kept to an acceptable standard

Question 12 | What impact do you feel this may have on you, your family or the wider community?

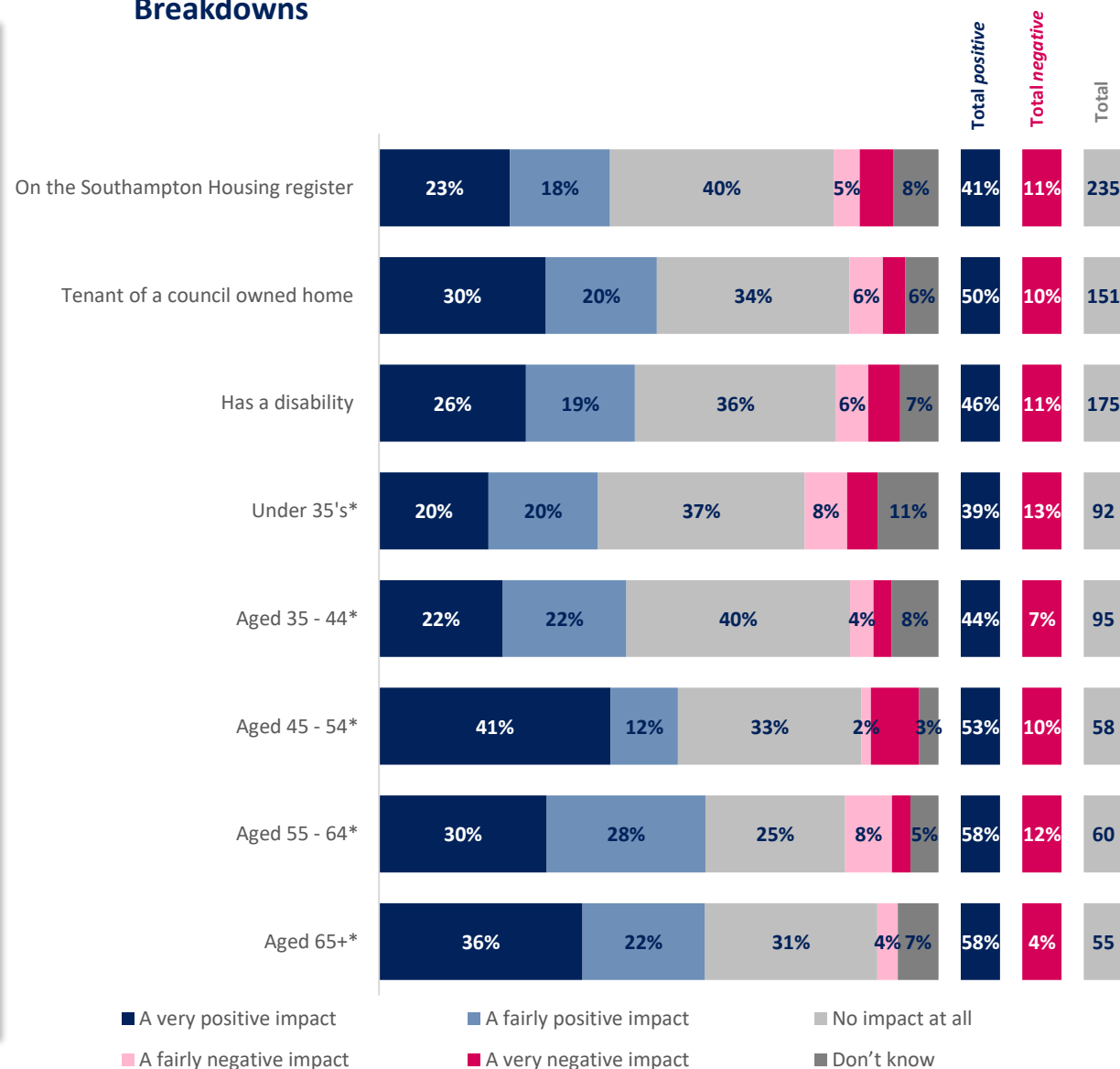
Total responses | 395



Key findings

- **Almost half** of respondents felt this proposal would have a **positive impact (48%)**.
- Those **under the age of 35** had the **highest negative impact**, however this was at **just 13%**.

Breakdowns



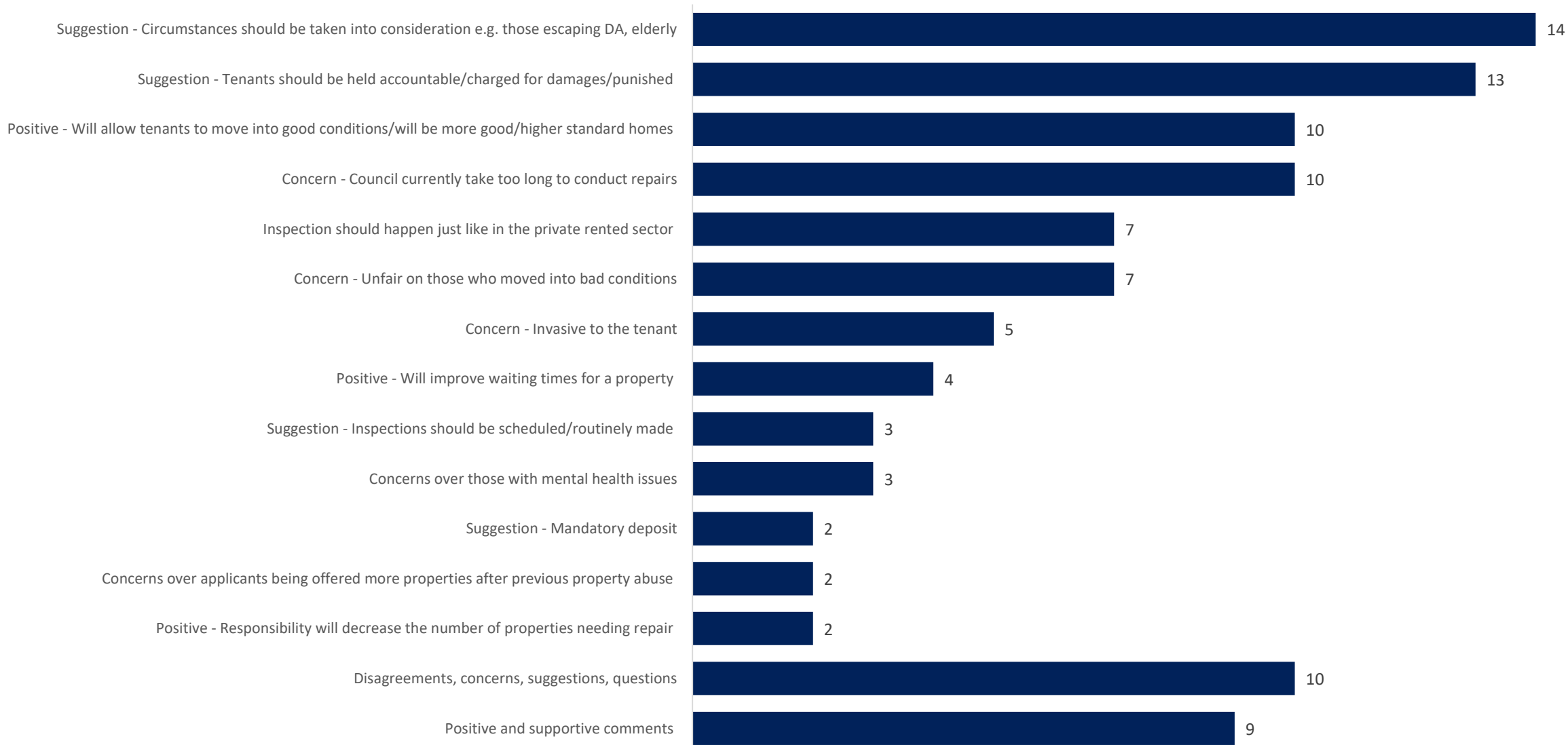
*Less than 100 respondents; **less than 50 respondents.



Total comments | 84

Proposed requirement that existing tenants have an inspection before they move that confirms a property has been kept to an acceptable

Total comments





Consultation feedback

Reading the draft strategy





Question 13 | Have you read the proposed draft strategy?

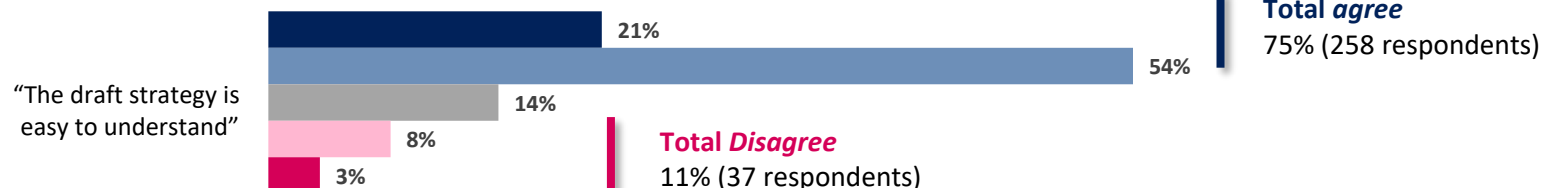


■ Yes, all of it ■ Yes, some of it ■ No

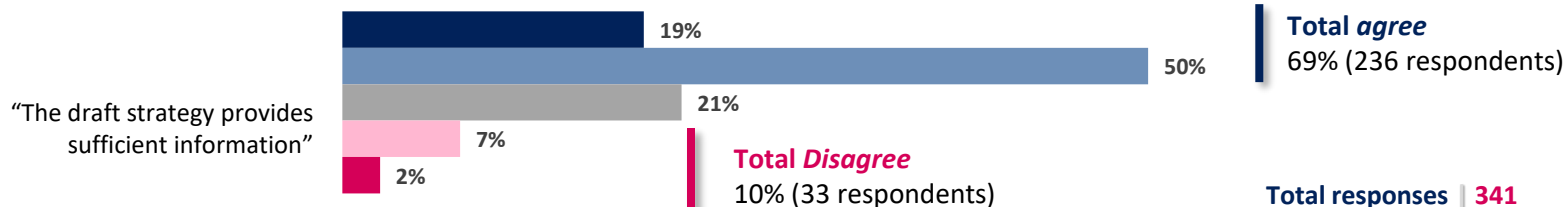
Total responses | 407

Question 14 | If you have read the proposed draft strategy, to what extent do you agree or disagree with the following statements?

Asked if "Yes, all of it" or "Yes, some of it" response to question 13.



Total responses | 342



Total responses | 341

■ Strongly agree ■ Agree ■ Neither ■ Disagree ■ Strongly disagree

Key findings

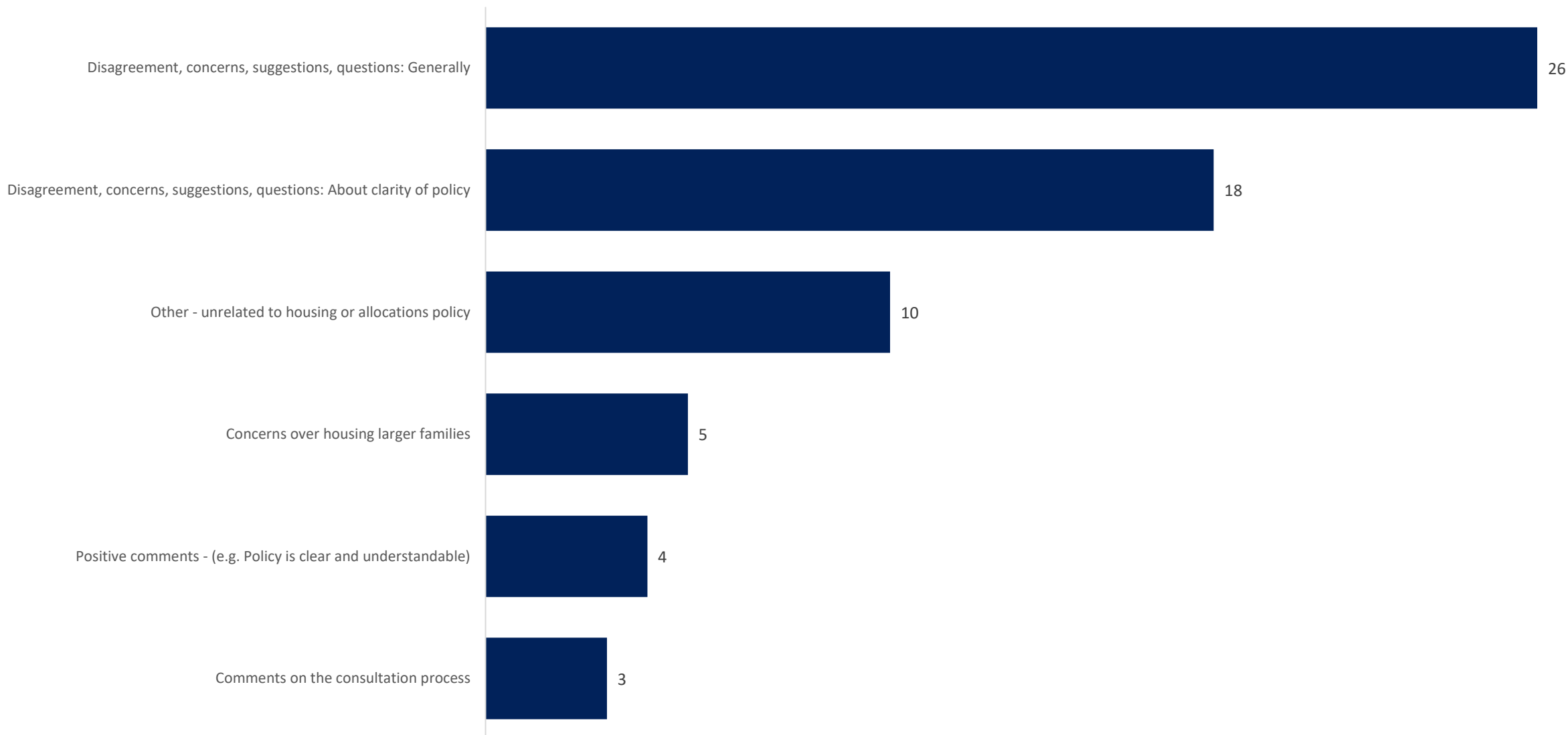
- Of the **89%** of respondents who either read all the proposed draft strategy or some or it, **75% agreed** it was **easy to understand**. While **69%** agreed that it **provides sufficient information**.



Total comments | 58

Comments on the draft strategy

Total comments

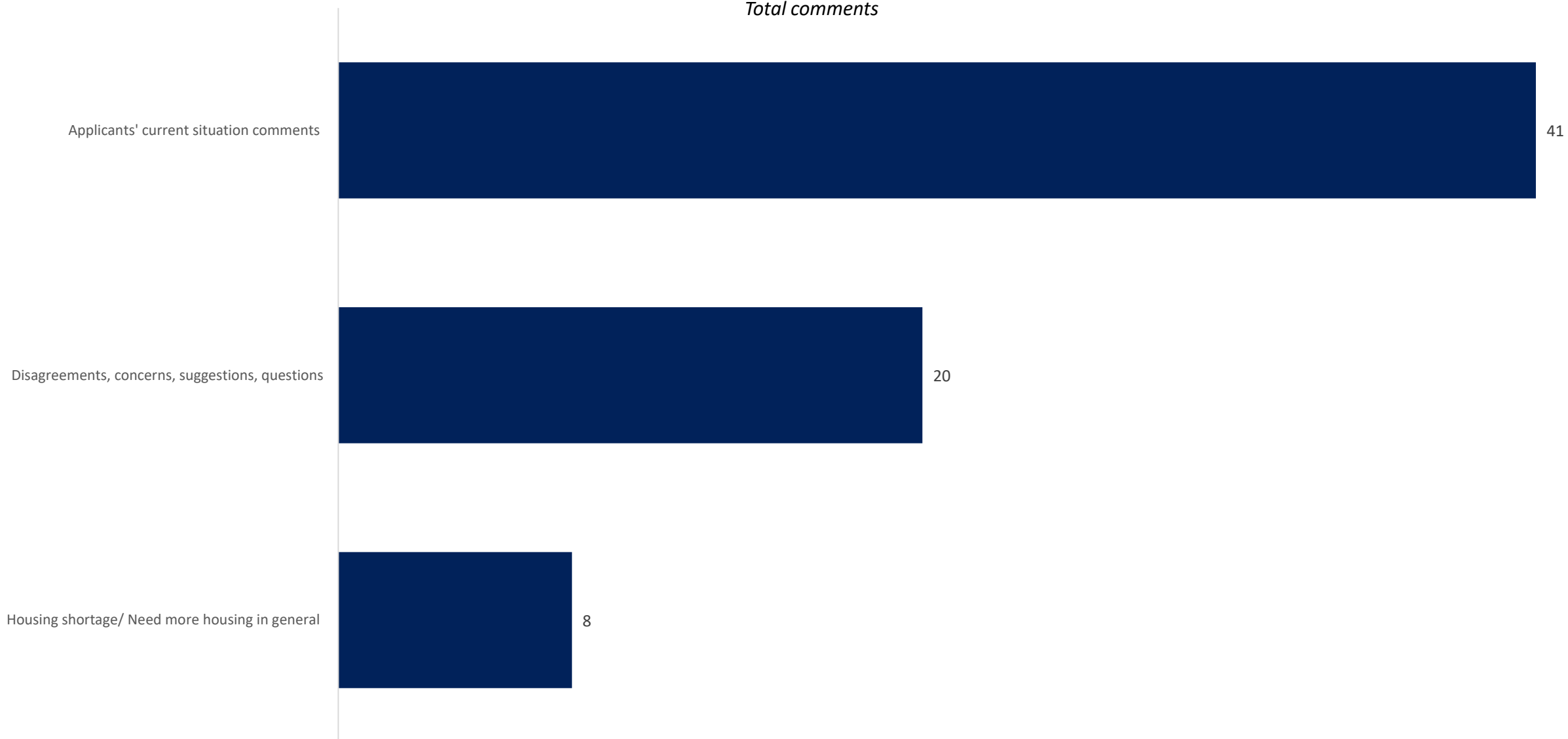




Total comments | 61

General comments on housing service

Total comments





Consultation feedback

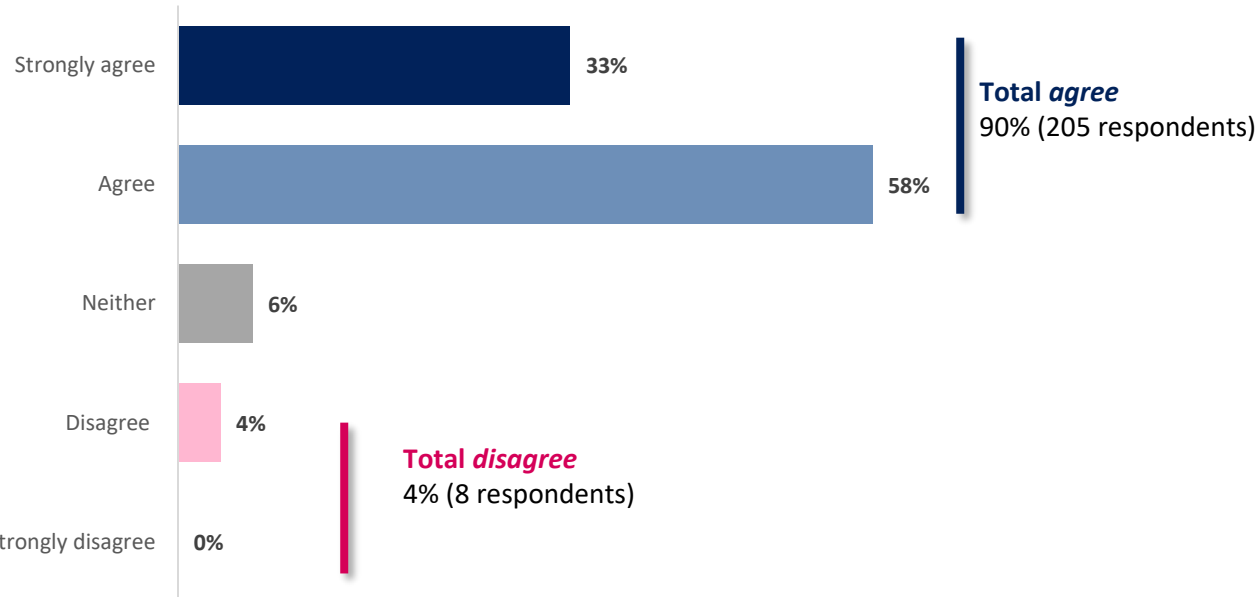
Homebid



Question 17 | To what extent do you agree or disagree with the following statements?

Homebid is easy to use

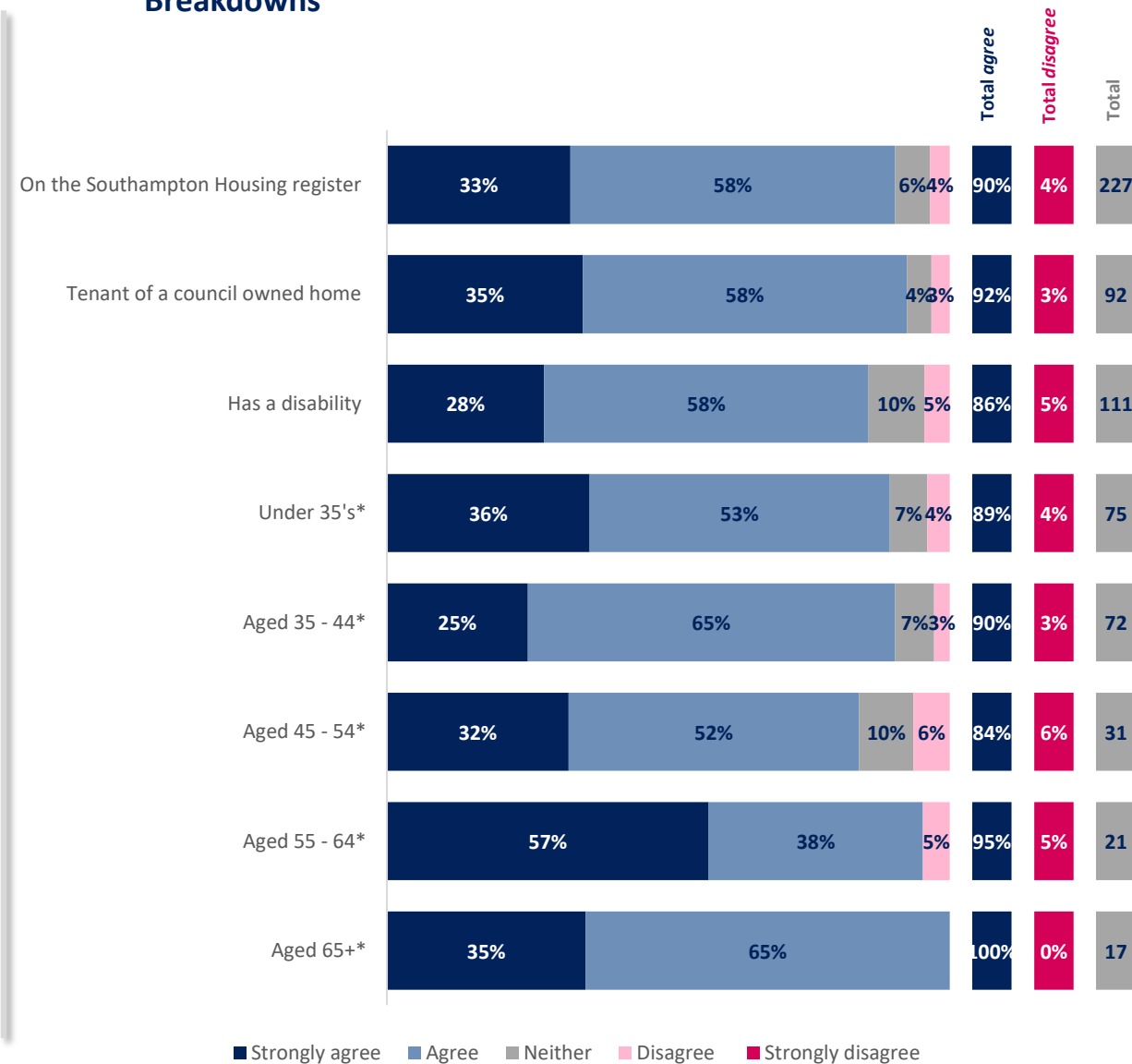
Total responses | 227



Key findings

- 90% of respondents find Homebid easy to use.
- 6% of those aged between 45-54 disagreed that Homebid is easy to understand.

Breakdowns



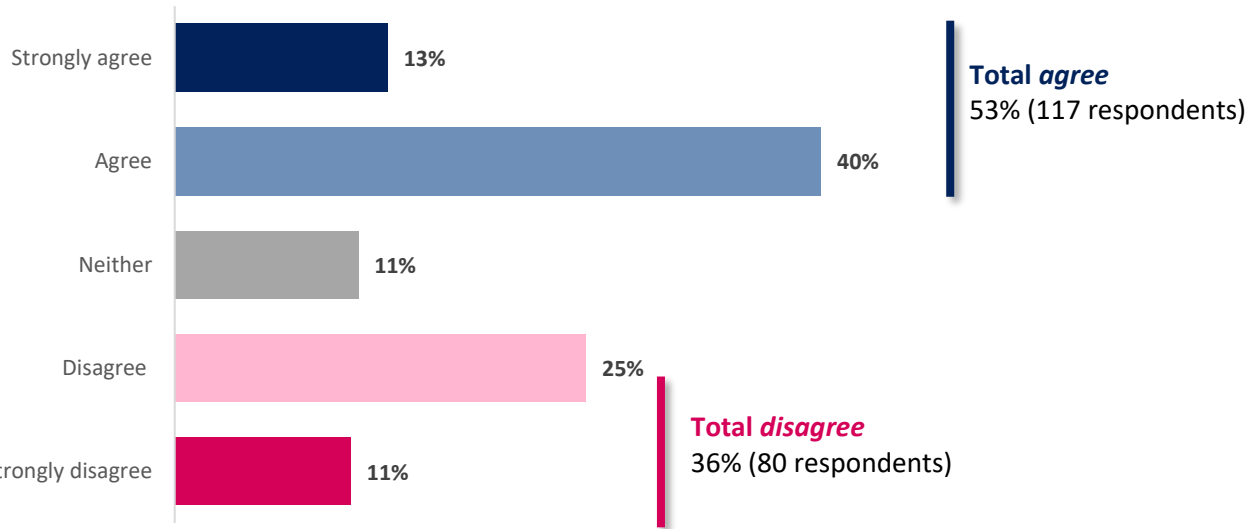
*Less than 100 respondents; **less than 50 respondents.



Question 17 | To what extent do you agree or disagree with the following statements?

The property adverts contain enough information

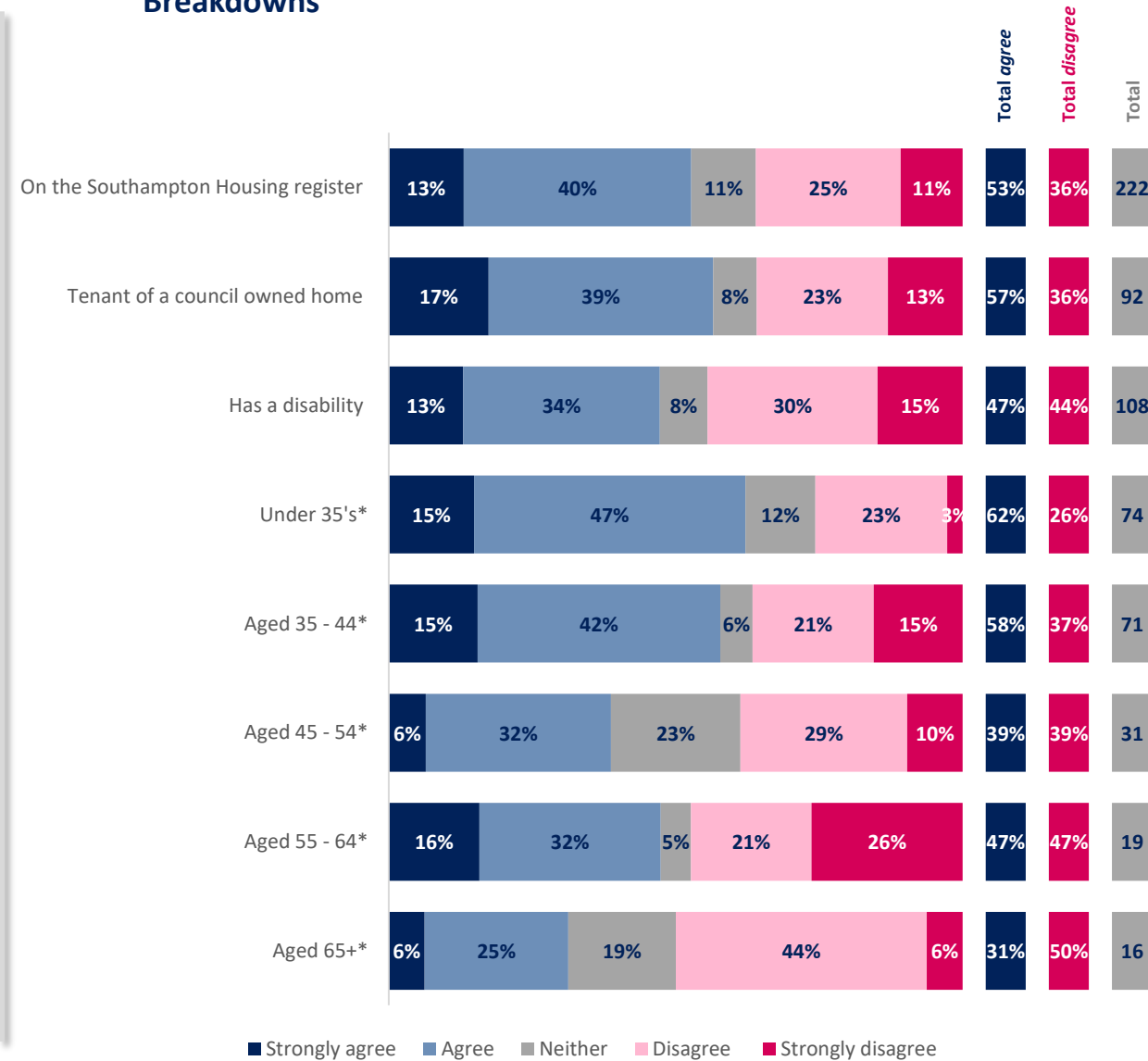
Total responses | 222



Key findings

- **Just over half the respondents** said they find the property advert to contain enough information (**53%**).
- **50% of those aged 65+** said they disagree that the property adverts contains enough information.

Breakdowns



*Less than 100 respondents; **less than 50 respondents.



Total comments | 65

