



EDINBURGH TENANTS FEDERATION

Edinburgh's Federation of Tenants' and Residents' Associations

Response to City of Edinburgh Council Allocations Policy Consultation - Summary

September 2011

1.0 Background

Edinburgh Tenants Federation is the umbrella organisation for tenants and residents groups in the city and a Registered Tenant Organisation (RTO).

The City of Edinburgh Council recently consulted on its Allocations Policy Review, and the Federation Meeting on Monday 5th September 2011 considered the Council's discussion paper.

Michael Thain (Strategy and Investment Manager) and Jennifer Hunter (Income, Rents and Tenancy Management Manager) from the City of Edinburgh Council were in attendance and presented proposals in the consultation paper.

Following discussion, members completed a survey form outlining their comments on the proposals. This paper highlights ETF members' views.

2.0 Key themes of the consultation

The consultation paper sought views on how to let Council homes. This includes the following key themes:

1. Recognising additional bedroom/s requirements of registered foster carers when determining the size of property for which the household is eligible
2. Proposing inclusion of time spent in the armed forces in determining the application 'date' for ex-service personnel
3. Existing local lettings initiatives, including:
 - i. Interim local lettings plan currently in operation for former age restricted multi-storey blocks
 - ii. Local lettings plans for the outlying areas in West Edinburgh
4. Adopting a clear and transparent policy on the use of sensitive lets
5. Review of the lettings policy for the mid market rent pilot in East Edinburgh to inform future lettings policies for subsequent mid market rent properties in development (including Gracemount)
6. Consideration of the impact of the Welfare Reform Bill 2011 and the proposals for under-occupancy.

3.0 Responses

In total 21 responses were made to the survey; the breakdown of respondents is outlined below.

- ✓ 11 responses were from individuals and 10 were representing tenants and residents groups
- ✓ 10 responses were from groups representing Council tenants and from individual Council tenants.

- ✓ 6 responses were from groups representing RLS tenants and from individual RSL tenants.
- ✓ 5 individuals did not give a response highlighting their landlord

Table One: Individual responses	
Number	Landlord
4	City of Edinburgh Council
1	Prospect Community Housing
1	Viewpoint Housing Association
5	No response given to landlord

Table Two: Tenants and Residents group responses		
Number	Representing	Name of Group
1	City of Edinburgh Council tenants only	Prestonfield Tenants
3	Tenants of Registered Social landlords only	<ul style="list-style-type: none"> • East Pilton Crewe Residents Tenants Group • Nichollfield Tenants and Residents Association • Pentland Edge Tenants Residents Association
5	Mixed tenure area including City of Edinburgh Council tenants	<ul style="list-style-type: none"> • Birnies Court Tenants Association • Hailesland Park Neighbourhood Council • Oxfangs Central Residents Association • Redhall Tenants and Residents Group • Restalrig House & Lochend House Residents Association
1	Mixed tenure area not including City of Edinburgh Council tenants	Westburn Village Neighbourhood Council

4.0 Key points

4.1 Question 1 – Registered foster carers should be able to bid for properties with an extra bedroom/s to enable them to look after foster children as required.

ETF strongly supports this initiative. There was overwhelming agreement with this proposal from groups representing Council, RSL tenants and from individuals.

4.2 Question 2 – Ex-service personnel that do not have any priority for housing should have their period of time served in the armed forces added to the time they have been registered with Edindex.

There were mixed views regarding the inclusion of time served in the armed forces for Edindex purposes with individuals (particularly those with no landlord given and individual RSL tenants) being more supportive of these proposals than tenants' group.

ETF is unable to support this proposal however, since 3 out of 5 tenants and residents groups representing Council tenants who responded either disagreed or strongly disagreed.

Comments made at the Federation meeting highlighted that for Council tenants, this proposal gives unfair advantage and enhanced rights to one group over another, and whilst the housing list is not moving, accepting this proposal seems impractical and unfair to other applicants.

In addition, there were mixed views from groups representing tenants of RSLs with 2 supporting the proposals and 2 in opposition.

4.3 Question 3 – The interim local lettings plan for former age-restricted blocks is reasonable and should be approved as permanent (subject to future review as required)

ETF supports this proposal, since 3 out of the 4 tenants groups representing Council tenants who commented on the proposals either agreed or strongly agreed.

In addition, 2 out of 3 groups representing RSL tenants either agreed or strongly agreed.

Individual Council tenants who disagreed with the proposals were from former age-restricted blocks, with one commenting "Don't agree with this as the age restriction has worked where I live."

4.4 Questions 4 – Do you agree with the existing Local Connection Policy?

There were mixed views about the existing Local Connection Policy, although on balance, more groups representing Council tenants disagreed with the current policy.

In total, there were more responses who did not agree with the Local Connection Policy.

For tenants living in the areas affected (the rural West) there were strong views that enabling local connection assists the sustainability of their local communities. And that 'incomers' from the city do not hold the

same 'set of values' as local communities and this is causing tension in rural communities.

However, overall comments from the Federation meeting highlighted that whilst there is such pressure on housing stock, protecting some stock for 'local connection' means the allocations policy is not based on applicants' need; rather it is based on preferences.

This was seen as unacceptable in a fair and transparent housing allocations policy. The point was also made that there are local communities and connections in all parts of the city; therefore using local connection only for the rural West is unfair and unsustainable for all applicants in Edinburgh.

4.5 Questions 5a) – The existing Local Connections Policy should be retained as it helps to create and manage sustainable communities.

Again there were mixed views about the existing Local Connection Policy, being retained with individuals (particularly Council tenants and those who did not indicate a landlord) more supportive of the proposal than tenants' groups.

Groups representing Council tenants were split 50/50 in this question (with 2 in favour, 2 against and 2 not responding), although when taken along with groups representing RSL tenants on balance, tenants groups' disagreed that the policy should be retained.

4.6 Question 5b) – All applicants registered with Edindex should have equal access to all Council homes across the city.

The Federation meeting showed overwhelming support that all applicants should have equal access to Council homes. The statement had equally strong support from individuals, tenants' groups representing Council tenants and those representing RSL tenants.

4.7 Question 5c) – A quota system as it would allow a proportion of homes to be allocated to people with a local connection, while allowing others from out with the outlying villages the opportunity to move there.

The Federation supports this proposal as an option. All of the tenants' groups representing Council tenants who responded supported this.

In addition, individuals (whether Council or RSL tenants, or with no landlord stated) on the whole either agreed or strongly agreed with this option. Groups representing RSL tenants were split 50/50 on this issue, with 2 strongly disagreeing and 2 agreeing.

4.8 Question 6a) - The introduction of a sensitive lettings policy would ensure best use of available properties.

ETF strongly supports this proposal. 4 out of the 5 groups representing Council tenants strongly agreed, whilst support was equally strong for individuals and for groups representing RSL tenants.

Comments were made that Council should ensure there are appropriate management guidelines and robust reporting mechanisms to tenants to avoid any allegations of mismanagement.

4.9 Question 6b) – The introduction of a sensitive lettings policy would support the development of sustainable communities.

Again, ETF strongly supports this proposal. 4 out of the 5 tenants' groups representing Council tenants strongly agreed, whilst support was equally strong for individuals and for groups representing RSL tenants.

This proposal also allows for a less concentrated spread of vulnerable tenants with high support needs (whose support requirements are often not in place) which can sometimes adversely affect communities. There was a strong view that tenants who require additional support should have their support needs assessed and in place before tenancies are granted.

4.10 Question 7 - The interim lettings policy for mid market rent is reasonable and should be approved as appropriate for use with future mid market rent properties that are let by the Council in the future.

ETF supports this proposal. There were mixed views regarding the interim lettings policy for mid market rent, with this proposal gaining support from 3 out of 5 groups representing Council tenants.

Tenants' groups representing RSL tenants marginally supported the proposal with 2 agreeing or strongly agreeing and 1 disagreeing.

One Council tenant commented that they disagreed because they are "opposed to mid market rents."

4.11 Question 8a) – Allocations should be restricted to matching the size of property with the size of the household if they get Housing Benefit.

ETF is unable to support this option and there was strong opposition to this proposal; all tenants' groups representing both Council and RSL tenants either strongly disagreed or disagreed.

This was particularly emotive, particularly since family circumstances can often change at short notice. Housing Benefit rules may change, however removing this choice from tenants is unfair and too restrictive.

Support for this proposal came from individual RSL tenants and individuals with no stated landlord.

4.12 Question 8b) – The Council should continue to let for example 2 bedroom properties to single people or couples, but advise them of the shortfall in rent and what, if any, alternatives there may be.

ETF strongly supports this proposal. 4 out of 5 tenants' groups representing Council tenants agreed that 2 bedroom properties should continue to be let to single people or couples, with advice provided about any rent shortfall.

Again, because family circumstances may change, enabling couples or single persons' 2 bedrooms allows for flexibility and changing needs. It was also felt this option could better support tenants who require family members or carers' support to remain in their own homes.

5.0 Conclusion

ETF welcomes the opportunity to comment on the Council's Allocations Policy Consultation. We continue to support the development of a policy which is equally accessible to all, based on need and flexible enough to be balanced with the need for sustainable communities.

- ✓ We support the initiatives relating to foster carers, use of the interim mid market rent policy, the current policy in allocating to former age-restricted blocks and the use of sensitive lets; we welcome clear guidance on how these are managed and reported.
- ✓ We oppose the local connection policy and the use of time served in the armed forces for the purposes of an Edindex application.
- ✓ With regard to proposals related to the Welfare Reform Bill, ETF agrees that the City of Edinburgh Council continues to let 2 bedroomed properties to couples and single people, as long as advice is given regarding any shortfall in rent.