

Consultation on Proposed Changes to Rother District Council's Housing Allocations Policy: Summary Report

Introduction and Background

1. The housing service consulted on proposed changes to the housing allocation policy to ensure social housing goes to those in greatest need. In addition, this was in response to changes in housing law.
2. The consultation sought to identify any gaps for inclusion and gather evidence of the potential impact of proposed changes to the Housing Allocations Policy. This includes understanding the strength of feeling on the changes, for existing and potential social housing tenants and local providers of social and affordable housing. The consultation results should give our Councillors evidence to take into account when making a final decision on the content of the policy.
3. Proposed changes were designed to deliver the following objectives:
 - Reduce the number of clients on the housing register down from 2,072 (July 2023) to 1,200 by March 2024, which is a stated goal of our Housing, Homelessness and Rough Sleeper Strategy adopted in 2019.
 - Reduce the use of temporary accommodation by focussing more on homelessness prevention.
 - Establish a transparent and clear method of awarding priority that meets the needs of local residents, particularly the most vulnerable.
 - Ensure the policy reflects changes in legislation, particularly regarding eligibility and the Homeless Reduction Act (2017).
 - Create a better pathway for clients supported under the Rough Sleeper Initiative.
4. The housing service regularly revises the allocation policy that sets the rules for joining the housing list and how households on the housing list can access social housing. The allocations policy was last reviewed and underwent a public consultation in 2019 and, prior to that, in 2014.
5. This consultation ran from 7 July to 4 September 2023.

Response Level

6. We invited to take part the current housing list and new applicants as they are the most affected by proposed changes. We invited all the Rother town and parish councils and representatives of local social housing suppliers and agencies involved with housing and low income.
7. There were 106 completed submissions using the online response form and a further two submissions using a printed questionnaire that were posted to the Council. In addition, there were 3 emailed responses from local organisations. Some emails came from housing clients but the contents were regarding individual cases as opposed to responses to the consultation. This is a total of 111 responses. In comparison, in 2019 we received 145 responses from 11

organisations and 134 housing applicants and other members of the public. It has always been difficult to engage respondents with this subject.

Who Responded

8. We had responses from 4 local charities or voluntary groups: Bexhill and Rother Homeless Unity Group (2 respondents) and 2 unnamed. We had responses from 5 parish councils, which were Ewhurst, Etchingam, Battle, Brede and Camber. We only had a response from 1 housing association, Sage Homes. There were 4 other organisations: Hastings Borough Council, Friends, Families and Travellers with 2 responses, ESCC: East Sussex Housing Partnership and Public Health (2 responses) and Icklesham Parish Community Land Trust

Demographic Breakdown of Public Responses

9. There were 23 local residents who are not housing needs applicants and 1 member of the public who works in or visits Rother.
10. 27 are currently in social housing, 2 are not currently in social housing but had been in the last 10 years, 65 were not living in social housing.
11. 75 said they were currently on the housing list, 3 were applying for the housing list and 19 were not on the housing list.
12. 24 are male and 67 are female with a further 4 who prefer not to say. Men were too under-represented to do any analysis by sex. It is commonplace that women are the majority of applicants applying and responding on behalf of their households for matters that require application processes such as housing, benefits and so on.
13. We asked for age group but there are not enough from an individual age group for analysis by age. Any analysis by age group would only be possible by grouping age groups together because of the small sample size in each group.
9 public respondents were aged from 18 to 29
21 were aged 30 to 39
12 were aged 40 to 49
17 were aged 50 to 59
13 aged 60 to 69
19 aged 70 to 79
2 were aged 80 and older
4 preferred not to say their age group.
14. We asked if respondents were disabled or have a long term limiting illness or condition that affected day to day living and 43 were disabled and 53 were not disabled. This is sufficient to do analysis by these two groups. This is a high proportion of disabled respondent compared to the population, which is not unusual for housing clients.
15. Regarding ethnicity we asked for their ethnic background or heritage:
79 White British
1 White Irish
2 White Other group
1 White & Asian mixed heritage
2 Asian

1 Black or Black British: African
10 prefer not to say

Summary of the Key Responses:

16. The following sections are the main responses from organisations and the public in order that they appeared in the questionnaire. This follows the order of the sections and main changes in the new policy.

Policy Objectives

17. All the objectives have a majority in agreement with them as proposed.
18. The objective that gets the most support is to maximise the use of social housing stock in the district at 50% strongly agree and 48% agree for a combined total of 98% in agreement (all respondents).
19. All of the responding organisations agreed with the following four objectives. Therefore these four objectives have the highest amount of support from local organisations (that responded):
- Ensure the allocation of social housing contributes towards socially, economically and demographically balanced communities.
 - Maximise the use of social housing stock in the district.
 - Assist the Council and its partners in meeting statutory duties, particularly in relation to ensuring reasonable preference to priority groups.
 - Prevent people becoming statutorily homeless.
20. The objective with the least support is 'ensure the allocation of social housing contributes towards socially, economically and demographically balanced communities' with 35% strongly agree and 44% agree but 13% disagree and 3% strongly disagree. This is based on all combined respondents.
21. We asked which three objectives are the most important. All respondents together answered as follows:
- Maximise the use of social housing stock in the district (72% selected this as their top three)
 - Let social landlords' accommodation fairly and in an open and transparent way (42% selected this as their top three)
 - Prevent people becoming statutorily homeless (41%)
 - Ensure the allocation of social housing contributes towards socially, economically and demographically balanced communities (36%)
 - Reduce temporary accommodation use (28%)
 - Minimise property void periods (27%)
 - Promote and achieve equality of opportunity (23%)
 - Assist the Council and its partners in meeting statutory duties, particularly in relation to ensurein reasonable preference to priority groups (22%)
 - Promote social inclusion (5%)
 - None of above (2%)
22. Organisations had a slightly different list:
- Maximise the use of social housing stock in the district (7 selected this as their top three)

- Ensure the allocation of social housing contributes towards socially, economically and demographically balanced communities (6)
 - Assist the Council and its partners in meeting statutory duties, particularly in relation to ensure reasonable preference to priority groups (5)
 - Prevent people becoming statutorily homeless (5)
 - Reduce temporary accommodation use (3)
 - Minimise property void periods (3)
 - Let social landlords accommodation fairly and in an open and transparent way (2)
 - Promote and achieve equality of opportunity (1)
 - Promote social inclusion (1)
23. We asked which objectives they thought should not be included.
24. Most of the responding organisations (8) said that they would remove none of the objectives. One organisation selected three objectives and said they were involved in housing accommodation selected this option but did not supply a name. Those objectives were to reduce temporary accommodation use, promote social inclusion and promote and achieve equality of opportunity. A second unnamed organisation selected meeting statutory duties and reducing temporary accommodation use.
25. For the public, in order of most selected for NOT being included are:
- None of the above: 50% said that they would include all the objectives.
 - Promote social inclusion: 19% selected this objective as one they thought should not be included)
 - Promote and achieve equality of opportunity: 16% said this objective should not be included.
 - Reduce temporary accommodation use: 16% said this objective should not be included.
 - Ensure the allocation... balanced communities: 12%.
 - Assist the Council and its partners in meeting statutory duties: 9%.
 - Prevent people from becoming statutory homeless: 7%.
 - Maximise the use of social housing stock: 3%.
 - Let social landlords' accommodation fairly: 3%.
 - Minimise property void periods: 3%.
26. The following organisations had comments on changes or additions that they would have made to the objectives.

Mental Health Officer, Friends, Families and Travellers

Equality of opportunity should be equity of opportunity as some need to be acted upon more favourably due to existing inequalities- e.g. Gypsies, Roma and Travellers

Young Persons Housing & Accommodation Manager, East Sussex County Council

Agree with all objectives.

Consultant in Public Health / East Sussex Housing Partnership, East Sussex County Council

Increasing use of temporary accommodation is a significant challenge across East Sussex, and one which has been shown to negatively impact on the health of individuals and families. It is important that the allocation scheme continues to support people to explore a full range of potential housing solutions.

Ensuring mixed and sustainable communities is important in reducing the risk of future health inequalities.

Moving On Co-ordinator, Hastings Borough Council

Clients in Supported Accommodation should be assessed on a case-by-case basis.

To ensure we can obtain sufficient throughput from Supported Accommodation, an urgent need priority should be given to clients with multiple complex needs, who might find it difficult to obtain accommodation in the private sector in a timely manner.

For clients who are capable of obtaining accommodation in the private rented sector, clients should still be eligible for social housing through choice based lettings, but be placed on a lower banding to incentivise throughput in the private sector and manage client expectations. Clients, if given a lower banding in Supported Accommodation, should be entitled to financial support from the local authority through their landlord incentives programme, to promote PRS access.

Ewhurst Parish Council

We seem to be concerned with the policy when the real issue is the size of the waiting list and the actual allocations. The number housed by RDC is tiny in comparison to the genuine agreed need.

The policy does not mention the need for bullied families to find a place of refuge, either temporary or permanent.

RDC need to buy and build social houses to replace those sold off by the right to buy. Buying a Supermarket or industrial land is not helping an increase in housing targets, which RDC is missing every year.

Battle Town Council

RE: Non-co-operation from Homeless Applicants - 'a period of time' is too open ended and ought to be clearly defined.

Bexhill and Rother Homelessness Unity Group (HUG) CIO

My main concern is that the jargon does not equate with the reality of the homelessness situation.

The objective should be to reduce homelessness not to change goal posts so that things look better on paper.

Paying £300 a week for TA is ridiculous, far better to increase the monthly payments for housing so that people can actually afford to top up and be able to rent in the private sector. Currently it is almost impossible to do this.

Unnamed Local Business

Until the supply of housing stock increases, there will always be pressures on being able to meet all the council's statutory objectives. Important to have some flexibility in meeting objectives on a case by case basis.

Changes to the local connection for having a relative living Rother

27. We asked how much respondents agreed or disagreed with changing the local connection of a close relative so that, while accepted on the housing list, that household would be in Band D.
28. Two of the responding organisations strongly agreed with this change and four agreed for a total of six. However, two disagreed and 3 strongly disagreed and the remaining organisation did not know or was not sure either way.

Move On Coordinator, Hastings Borough Council

This could incentivise clients to take up employment in the local area, to ensure local connection, which would open the opportunity into finding alternative accommodation in the PRS. It is likely to reduce demand on the housing register where clients have not previously lived in Rother, but the local authority must ensure they refer onto another local authority where they might have local connection, to support with their housing solutions

Ewhurst Parish Council

We are using ratepayers money and our genuine residents and their families should come first. The need of others is for the central government, not a District Council. S106 on a new build should be stronger on this issue.

Battle Town Council

There are, on occasions, need for family members to move to an area where there is an existing family member who has special needs, poor health, mental health conditions, that may be alleviated by having a close family member nearby.

Bexhill and Rother Homelessness Unity Group (HUG) CIO

Family support is often vital to people who find themselves homeless. The banding should be awarded according to the need of the homeless person, they should not immediately be categorised as Band D,

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Mental Health Officer, Friends, Families and Travellers

It is increasingly difficult for someone who needs to be able to move location to do so. Needs can be for health and wellbeing, such as needing support from family members, or to support family members. Having such a 'black and white' policy will cause great difficulty for many members of society in greatest need.

This would also be racial discrimination towards those ethnicities who live nomadically such as Romany Gypsies, Roma and Irish Travellers. Section 6 of the Public Sector Equality Duty states the need to sometimes act more favourably upon those with protected characteristics in order to create equality. Since Gypsies, Roma and Travellers are much more likely to be living 'no fixed abode' there is an equality which needs to be levelled and this would prevent that."

Team Manager, Friends, Families and Travellers

Working as the Team Manager for the Gypsy and Traveller team our community is diverse and transient. This means that forming local connections can be difficult, so it will limit opportunity.

Outreach Worker, Friends, Families and Travellers

As an outreach worker working with Gypsies and Travellers in Sussex, I would deem this change to the allocations policy to be discriminatory to Gypsies and Travellers looking to get onto the housing register in Rother. Due to some Travellers still being transient, having no fixed address etc, removing the family connection would disproportionately affect Travellers moving to be with their family. Although a lot of Travellers are now settled, many still travel for work and other reasons. If all councils adopted this change in policy, transient Travellers would be unable to settle anywhere. The life of a transient Traveller is extremely tough, even to do the day-day things such as finding clean water; it has been made tougher by legislation such as the new Policing Act that criminalises trespass and stopping. Therefore, many choose to settle, sometimes because they are elderly or sick and need to be looked after by members of their family who are settled. This change in policy would mean disabled, sick and elderly members of Travelling communities would not be able to get this care if their family lived in Rother. Gypsies and Travellers have protected characteristics under the Equality Act and under S149 public authorities are required to minimise disadvantages they suffer and take steps to meet the needs of those with protected characteristics. This change in policy would go against these duties you are required to uphold as a local authority.

Young Persons Housing & Accommodation Manager, East Sussex County Council

Consideration should be given on a case by case basis as to the reasons why the applicant is looking to rely on this local connection eligibility. Are they vulnerable and do they need to be close to particular relatives for specific reasons?

Consultant in Public Health / East Sussex Housing Partnership, East Sussex County Council

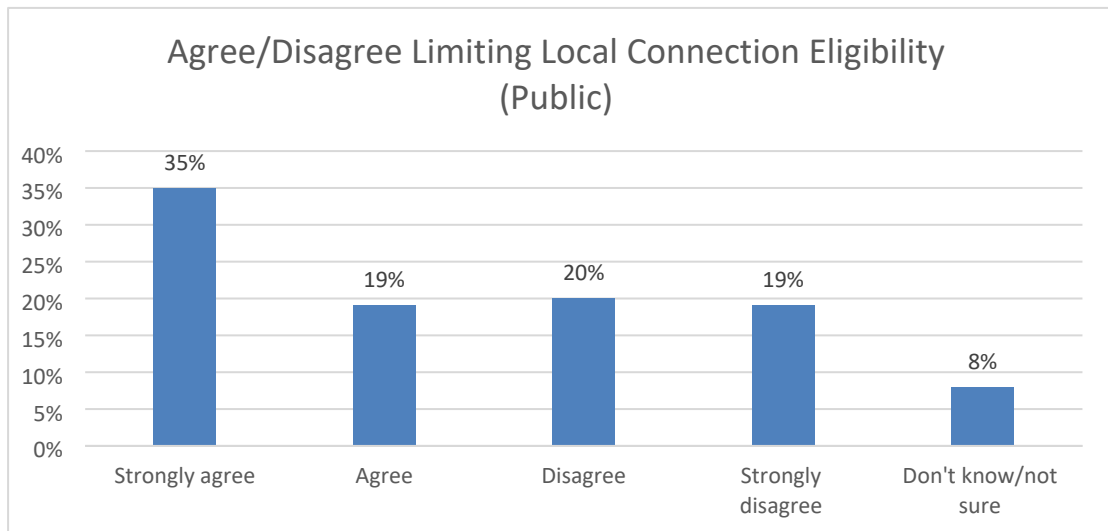
There are a growing number of individuals in housing need across East Sussex, reflecting broader national trends. Supply of social housing is limited and it is important that the available stock is allocated fairly and transparently."

Unnamed business

Again this comes down to being able to meet the Council's overall statutory objectives rather than creating artificial constraints on supply.

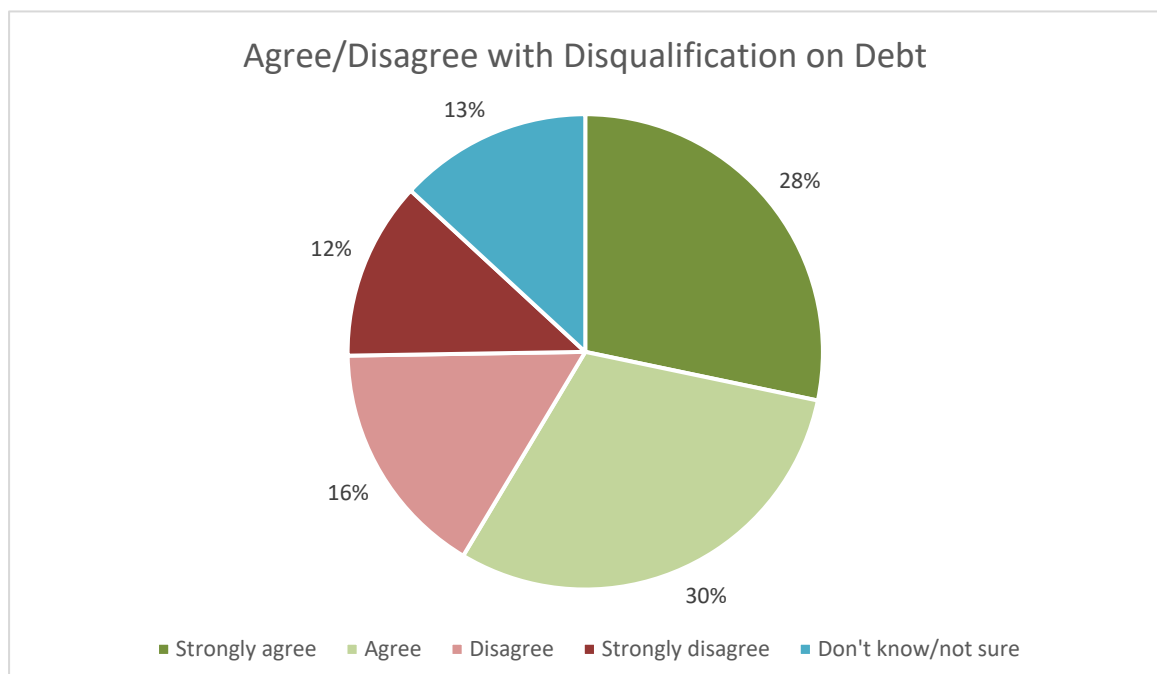
Residents/Applicants

29. In terms of responses from the applicants or local residents, in total 54% either agreed or strongly agreed with this proposed change. The breakdown is 35% strongly agree, 19% agree, 20% disagree and 19% strongly disagree. The remaining 7% didn't know or were not sure.



Disqualification criteria on debt

30. We asked respondents if they agreed or disagreed with the proposal to change the disqualification criteria on the applicant's household debt.
31. All residents' and applicants' responses were that 58% agreed or strongly agreed. The breakdown is in the chart below:



32. There were 10 local organisations that responded. Of those, one strongly agreed, 3 agreed, 4 disagreed and 4 strongly disagreed. Their comments were as follows:

Ewhurst Parish Council

Without knowing the reason for the debt is penalising the most needy. Debt may well have accrued by housing themselves privately when the district council has not housed them.

Move on Coordinator, Hastings Borough Council

I believe that the level of debt used as a disqualification criteria should be more flexible, and assessed on a case-by-case basis, determining how and why the debt accrued. You could risk excluding incredibly vulnerable clients from the housing register, where their debt may have accrued due to a number of factors outside of the clients control. I also feel that in the midst of a cost-of-living crisis, this strategy to reduce the amount of debt accrued as disqualification criteria, could be risky, and potentially increase the amount of demand for temporary accommodation.

However, this would also create incentive to increase personal responsibilities over paying priority bills payments and rent on time, where there are cases that some clients accrue rent arrears intentionally. Thus, it should remain a case-by-case assessment.

Battle Town Council

At this time of economic crisis, with high food and fuel increases, it is not a sensible proposal to reduce the threshold amount.

Bexhill and Rother Homelessness Unity Group (HUG) CIO

In a time when many people are in debt and many working people using credit cards it seems wrong to discriminate against people without trying to understand why they have accrued the debt and if they can be helped in any way.

Mental Health Officer, Friends, Families and Travellers

Many people are in debt due to no fault of their own, and lots of these are in inadequate housing.

This all depends on the exceptional circumstances, so more information is needed.

Team Manager, Gypsy and Travellers, East Sussex County Council

Unless exceptional circumstances are proven. The onus is on the tenant to address arrears.

Outreach Worker, Friends, Families and Travellers

This is further disadvantaging vulnerable people who are unable to pay their rent during this cost of living crisis which is affecting us all but disproportionately, people who were already destitute.

Rather than disqualifying them from the housing register, why not adopt a more holistic approach? Could you make connections with the local debt/grant charities so they are referred to them (whilst also being allowed to be on the housing register). By the time a property is offered to them, they may have resolved this debt with the support of a debt charity or grant provider.

Young Persons Housing & Accommodation Manager, ESCC

With the cost of living crisis currently this does not seem like the right time to change this criteria. Could the period of maintained payment agreement be made shorter?

Consultant in Public Health / East Sussex Housing Partnership, ESCC

The rising cost of living means that an increasing number of households are falling into debt. Finding affordable housing is an important way for individuals and families to create sustainable living arrangements. It would be preferable to maintain the current level and demonstrate that a household has entered and is keeping to a sustainable repayment plan.

Business Not Named

This is a potential pitfall but clearly those with debt issues need to address the reasons for the debts. With changes in the debt collection environment e.g. breathing space legislation, those with debts can get help in addressing their issues.

Pitfall though is will the Private Rental Sector take those with any debt or CCJ however incurred?

Pragmatically specifying those who haven't dealt with a priority debt such as Council Tax being disqualified from the register underlines the need for debtors to set the right priorities or get help to do so.

This is a surprisingly tough change though necessary.

New Urgent Needs Priority Band

33. We asked respondents if they agree or disagree with the proposal for adding a new urgent needs band before the priority bands A to D.
34. The responding 12 organisations response was that 4 strongly agree, 5 agree, 1 disagrees, 1 strongly disagrees and 1 didn't know or wasn't sure.
35. The organisations' comments were:

Ewhurst Parish Council

With only band-A people actually being housed really negates this change. Putting those in most need at the top of the list would achieve this. I see no need to change. If we had an oversupply of Social houses being at the top would still have the same outcome.

Move on Coordinator, HBC

This should help provide urgent housing assistance to clients most in need and reduce demand for temporary accommodation.

From the perspective of Supported Accommodation, clients with multiple complex needs will struggle or find it impossible to secure and retain a tenancy in the private sector. I would welcome an agreement that places potential urgent need, or the highest priority banding, for clients with multiple complex needs, and a lower banding to clients capable of securing accommodation in the private sector, to manage expectations and disincentive a sense of entitlement to social housing. However, to ensure we get sufficient throughput from Supported Accommodation for less vulnerable clients, we would need to ensure

those clients have access to financial support through a landlord incentive programme, to promote PRS access.

Bexhill and Rother Homelessness Unity Group (HUG) CIO

I think I agree in principal but the phrase one direct offer concerns me as I am unsure what this actually means. Does it mean they will be offered a place and they must take it irrespective of where it is?

Team Manager, Gypsy and Travellers, ESCC

I deal with situations where there are urgent needs for my client group to move due to risks posed to them and their family. I see this as a positive step forward.

Outreach Worker, Friends, Families and Travellers

I don't disagree with the creation of a new band however, I do disagree that rather than offer someone in urgent need temporary accommodation, they would be offered direct lets.

Although they are direct lets which gives the client more avenues in which to report issues with the property or the landlord, there are still more vulnerable to; eviction, rent increases. Therefore, giving people who you deem the most vulnerable/in need direct lets rather than choice based lettings, there seems to lie a major issue. Calling them the most urgent/in need and then offering direct lets which is still private rented accommodation (despite the additional support of it being direct lets).

I would argue it still leaves the most in need people being vulnerable to instability, rogue landlords and high rents.

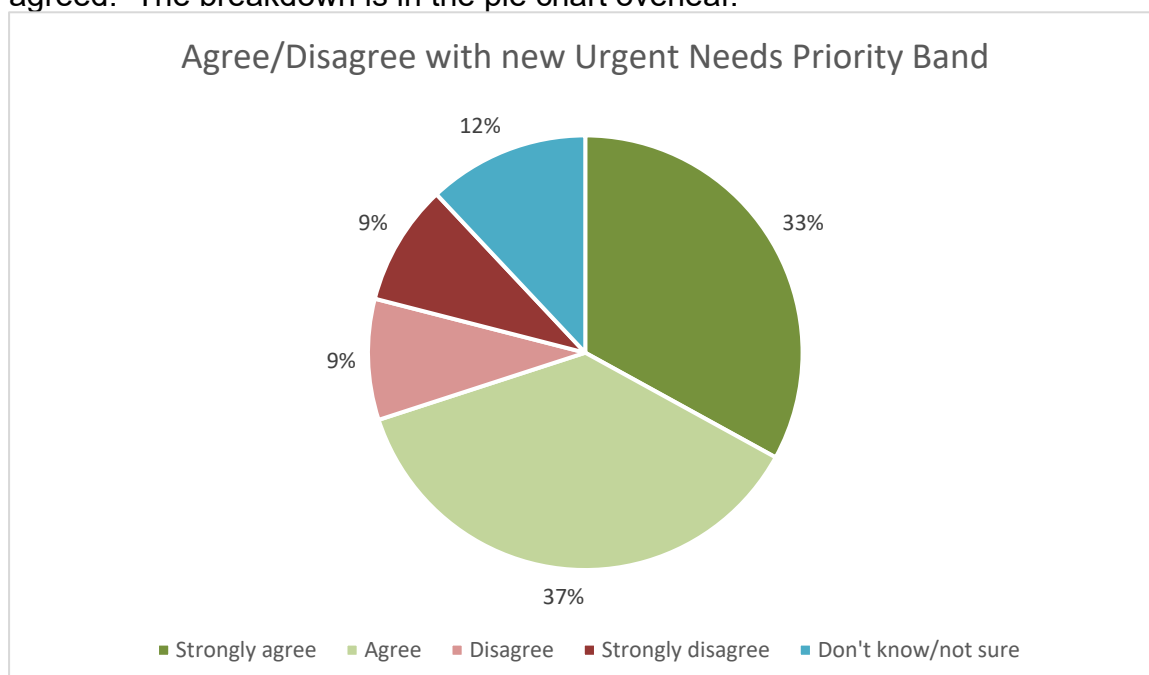
Young Persons Housing & Accommodation Manager, ESCC

This would be a positive change to current arrangements.

Consultant in Public Health / East Sussex Housing Partnership, ESCC

It is acknowledged that there is a shortage of affordable housing solutions and as a result people who would be unable to find suitable accommodation in other tenures face long waiting times to access settled housing.

36. Residents responded were in majority agreement, 70% either agreed or strongly agreed. The breakdown is in the pie chart overleaf:



Agreement with Reasons for Household to be Placed in Urgent Needs Band

37. We asked whether respondents agreed or disagreed with the various proposed reasons that a households would be placed in an urgent needs band as opposed to Band A to D. In other words, what they agreed constituted an urgent need and being in the highest priority for social housing. The questionnaire briefly explained each of the proposed reasons. (See appendix)
38. Overall, with all types of respondents, there was majority agreement for all the reasons. The most popular reason was domestic abuse. In second place was exceptional homeless households. In equal third place was severe housing conditions and welfare. The least supported reason was permanent decant, although two thirds of respondents still agreed with it.

Urgent Needs Reason: Severe housing conditions

39. Organisations responded with strong support as 9 strongly agreed and 3 agreed.
40. Residents responded with 87% saying that they agreed or strongly agreed. Comment on this reason is as follows:

Severe conditions: not sure how that differs from (un)adapted property, a decant or medical.

Urgent Needs Reason: Welfare

41. Organisations supported this reason with 7 strongly agreeing and 4 agreeing. Comments from the Move On Coordinator (HBC) were: Note on the section of Welfare. Clients in Supported Accommodation assessed as ready to move on to independent living, who have multiple complex needs, i would strongly agree to be placed in an urgent need category as it is significantly unlikely that they would be able to secure and retain a tenancy in the PRS. For clients who are less vulnerable and can illustrate an ability to access private, should remain on choice based lettings, determined by a level of priority on a case-by case basis. This could be assessed through the move on readiness checklist.
42. Residents responded with 84% saying they either agreed or strongly agreed.

Urgent Needs Reason: Exceptional homeless households

43. Organisations supported this reason with 9 strongly agreeing and 3 agreeing. Relevant comments for this reason were:
- All homeless should be considered in urgent need! (Friends, Families & Travellers).
44. Residents responded with 86% saying that they agreed or strongly agreed. Related comments to this reason were:

Housing say they help needy but temp accom could be well over a year. Not good enough.

Exceptional homeless households should still use the bidding system.

Urgent Needs Reason: Hospital discharge

45. Organisations supported this reason with 9 strongly agreeing, 2 agreeing but 1 organisation disagreed (Ewhurst PC).
46. Residents responded with slightly less support than other reasons at 76% saying they either agreed or strongly agreed.

Urgent Needs Reason: Adapted property

47. Responding organisations supported this reason with 7 strongly agreeing, 3 agreeing but 2 disagreed (Ewhurst PC and Battle TC). Relevant comments for this reason were: There is a particular shortage of adapted accommodation, which can create delays arranging hospital discharges and ensuring that individuals can continue with the next stages of their recovery. (Public Health/East Sussex Housing Partnership, ESCC)
48. Residents responded with 795 saying that they agreed or strongly agreed.

Urgent Needs Reason: Domestic abuse

49. Organisations were overwhelmingly in agreement with 10 saying they strongly agree and 2 agreeing. None were in disagreement. Related comments were: The top of Band A would achieve this, having an extra group is not needed. The inclusion of Domestic Abuse is good to see... (Ewhurst PC).
50. Residents responded with 86% saying that they agreed or strongly agreed. Comments included:

I would also add something else. Years ago I was in a domestic violence situation and had to flee the place where I was living. I had been in this country for a short while but was already settled (school for my children and I had a job), and the only people who I knew were in that area. At the time I spoke to a lady from a support charity who was trying to help and she said that I was qualified to get social housing but one of the criteria was that i had to move away from the area where i was living (understandably, as it was also where my ex partner lived) but I didnt want to move because it was the only place where i had friends and connections, plus my children's school and where i had a job. I didn't drive at the time and I didn't know anyone else apart from the people there, so moving would mean that I woudl no longer have that job or be near my children, and that's why i didn't accept the offer and had to look for na place in the private sector. I eventually found a one-bedroom place for me and my children at the time, but that wasn't the ideal situation and I could've used the help of benefitting from social housing then if i had been allowed to stay in the area. I also knew that my ex-partner was selling his house and would eventually move out of the area, which was what happened.

I feel those suffering domestic abuse need urgent and sympathetic help and accommodation.

Urgent Needs Reason: Permanent decant

51. Organisations supported this reason with 7 strongly agreeing, four agreeing and 1 organisation replying don't know or not sure (Ewhurst PC).
52. Residents had the least support for this reason, although still a majority, with 64% saying they either agreed or strongly agreed. Specific comments on this reason are:

An unsuccessful bid for 6 months should not be given priority status due to permanent decant.

From what I see living near social housing estate there are way too many 'disabled' people in either adapted accommodation which didn't need to be adapted as the tenants are not disabled. A lot more investigation needs to go into checking these 'disabled' non workers who are never going to put back anything into society.

Urgent Needs Reason: Medical (severe & immediate)

53. Again, this had strong support from organisations that responded with 9 saying strongly agree and 3 replying agree.
54. Residents gave this reason the second highest amount of support with 88% saying that they agreed or strongly agreed with this reason. Related comments to this reason were:
55. People at risk or due to personal or health issues should be able to be placed in urgent housing situations.

Since I have been on home move band b I have never been offered a place to suit my needs. I am a disabled person, have provided evidence to support my claim and I still now have to struggle stairs and steps in and out of my house. No support from home move even with my consultant backing me up.

If you have a local young family cramped in a very small 2 bed flat with limited access no garden, 2 small boys, mum and 1 son have extreme medical conditions then why can they not be considered for any one of the vacant 3 bed properties which are local to them, their family their support network and friends and children's school ???

We have had three families from 'out of the area' take these properties with one with only 2 same sex children (not 3) as should be, and disclosed 3 children when not the case or the truth, just because they had several neighbours complaints from previous address so moved on to somewhere they didn't choose to be over a family in need.....the system is wrong !!!!!!!

The ones I have highlighted are in my opinion right. However I strongly agree that people with a medical need should outway the rest.

Urgent Needs Reason: Significant Risk

56. Organisations supported this reason with 8 strongly agreeing and 4 agreeing.
57. Residents gave this reason the highest amount of support for any of the reasons with 90% saying that they agreed or strongly agreed with this reason.

Urgent Needs Reason: Exceptional reasons

58. The majority of responding organisations supported this reason with 7 strongly agreeing, 4 agreeing but 1 organisation disagreeing (Battle TC).
59. Although there is a clear majority in agreement with residents, they gave this reason equally the least amount of agreement along with hospital discharge. Residents said 76% agreed or strongly agreed with this reason. Comments related to this reason were:

Exceptional reasons - say loss of income through losing income, or exceptional bereavement.

Band A

60. We asked respondents about changes to a revised Band A regarding the reasons a household would be placed in Band A rather than the Urgent Needs band or bands B to D. Overall, either responding organisations were unanimous in agreement or had just one organisation who were not sure either way. The majority of applicants and residents agreed with each of the reasons, although some reasons for inclusion had more support than others.

Reason to be in Band A: add applicants served s.21 notice

61. Organisations overall supported this reason to be in Band A, with 3 strongly agreeing and 7 agreeing. However, one organisation said they don't know or were not sure if they agreed or disagreed (HUG Homeless Unity Group). Comments on this reason were:

If they qualify for Band A then yes. Need to understand the reason for the S21 notice before commenting. The criteria for Assisted housing would still be relevant. If they were housed by a private landlord in the private sector I see no need to change unless the qualify for Band A. Ewhurst PC

Yes- PRS s.21 notices are the highest cause of homelessness and use of temporary accommodation. Move On, HBC

These people clearly need this help what concerns me is the logistics of homing all these people who would be band A. Surely it would need a miracle. Bexhill & Rother Homeless Unity Group (HUG)

I agree- tenants are left so so vulnerable by s21 notices and if the government aren't going to ban them, it falls to Local Authorities to aid in supporting people after being served these. Often people are served these if they request repairs, oppose rent increases and other perfectly legal things, it's great that Rother are planning to give protections to these people. (Friends, Families & Travellers)

Positive addition to Band A and recognises no fault eviction and engagement with PHP and council. (Young Persons Housing & Accommodation, ESCC)

The private rented sector in East Sussex is increasingly unaffordable for low-income households. Given the shortage of affordable housing, it is important to support all opportunities to prevent homelessness and avoid households being

placed in temporary accommodation. (Consultant in Public Health/East Sussex Housing Partnership, ESCC)

62. Over two thirds or 68% of residents either agreed or strongly agreed with the inclusion of this reason and only 14% disagreed. The remainder did not know either way. Some comments from the public were:

To be presented with a 14 day notice to leave is catastrophic when a young family is involved, these applicants should certainly be included, to give the chance to start again. (Strongly agree)

It's important, and I believe I have had personal experience of this. (Strongly agree)

I agree because of "no fault of their own". (Agree)

I agree but I don't see why it should be backdated by 12 months. (Agree)

You sure they'll pay the rent? (Disagree)

This will not be relevant shortly. (Disagree)

If some one us served a section 21 through no fault of their own and they have exhausted all avenues to find accommodation, then yes i agree support should be offered, if they can prove they have tried other avenues and not relied just on council support. (Don't know)

Reason to be in Band A – adding applicant leaving living with friends/family, with child, overcrowded

63. Organisations overall supported this reason to be in Band A, with 3 strongly agreeing and 7 agreeing. However, one organisation said they don't know or were not sure if they agreed or disagreed (HUG Homeless Unity Group). Comments from organisations were:

There is a real need with offspring to share with parents and having their own families. Currently, they could be Band A but that does not achieve anything due to no housing stock to fill the need. Ewhurst PC

If all conditions are met by the client, it would be in their interests to live in their own property. Homeless Unity Group

This measure will be an important prevention tool and may allow existing arrangements to be sustained while a household waits for suitable accommodation and prevent them being placed in emergency accommodation. (Consultant in Public Health/East Sussex Housing Partnership, ESCC)

64. There was majority support from residents with 62% saying they either agree or agree strongly. However, 20% said they disagreed or disagreed strongly. The remainder did not know either way. Some comments from the public are:

I am currently living like this and it is a nightmare. My daughter has never had her own room we are sharing at the age of 36 and 7. We can't live a normal life like having friends round, playing with her toys in her room. Sharing a bathroom,

kitchen no space from each other. Its not fun. I'm waking her up when i get up early as she hears me, I'm disturbing her when I'm going to bed - it doesn't matter how quiet i am. So sleep feels non existent. My mum has ill health and she doesn't get a break from us, and working in the NHS its stressful. (Strongly agree)

Good in theory, hopefully in practice too. (Agree)

Agree but do not agree with backdating 6 months. (Agree)

I feel it's too open for abuse of the system to get housed quicker. (Disagree)

I don't agree, I feel they would be taking over places of people who need them more. (Disagree)

This should not be an accept all situation. Cases should be accessed individually. Some adults choose to have a children when they are relying on friends / family for accommodation knowing this will give them an advantage for social housing.

Being made homeless with children already and then forced to live with friends / family should be deemed a priority. (Strongly disagree)

There is no problem with a parent sharing a room with a child and this should not automatically get that person into category A. (Strongly disagree)

I think that this is a priority but not high priority. I think this comes into first given temporary accommodation for six months then given an offer of housing. (Don't know)

This is all OK but I disagree that people should have lived with family or friend for 12 months prior to birth of child, how would this support someone who had to move with family or friends due to becoming pregnant? (Don't know)

Reason to be in Band A – adding applicants issued an eviction notice

65. Organisations were in overall support with five saying they strongly agree, five saying they agree and one saying they don't know (HUG volunteer). Specific comments on this reason were:

Have to be treated in the same way as S21. Again, we need housing stock to fulfil the need. Ewhurst Parish Council.

If the person in question is engaged in the process. Gypsy and Travellers Team, ESCC.

66. Residents responded with 82% either agreeing or agreeing strongly and only 9% saying that they disagreed. Some comments on this reason were:

Been here with very young children very stressful as council very unhelpfully and had to contact shelter. (Strongly agree)

Private landlords can do anything they want. There is no security. Absolutely Band A - if not urgent need. For me it would be. (Strongly agree)

Everyone deserves a chance and especially if it's not due to their own issues. (Agree)

Because it would prevent them from living on the street. (Agree)

They should be encouraged to seek accommodation in the private sector first. (Disagree)

This should not be in band A .They should first be given temporary accommodation, and every assistance in finding private accommodation while being on a lower banding raising to a higher banding in time. Like the rest of us on higher banding there should be a waiting time to allow band A to receive a property first. (Disagree)

Applicants should move into any accommodation offered including temporary accommodation. (Strongly disagree)

Reason to be in Band A – adding those moving on from rough sleeper schemes

67. Organisations that responded had a strong majority agreement. Five had strongly agreed and five had agreed. One organisation didn't know or wasn't sure either way (Gypsy & Traveller Team, ESCC). Comments regarding this reason were:

Need to understand why they were rough sleeping in the first place. Housing Officer to determine the real need and would place the applicant on Band A, again we need housing stock to make this operational. You are just adding to the list. (Ewhurst PC)

I agree with this but it should be a smooth transition and not necessitate returning to TA first. (Bexhill and Rother Homelessness Unity Group (HUG) CIO)

100% agree- more councils need to adopt this to stop the cycles of rough sleeping a lot of vulnerable people go through. (Friends, Families and Travellers).

This would recognise the continued engagement and progress of the applicant with the FRSP or NSAP and give them the best chance of achieving the ultimate outcome of moving on to live independently. (Young Persons Housing & Accommodation, ESCC)

A shortage of suitable move on accommodation has been a significant challenge for the rough sleeping initiative, improving move on from RSAP units will reduce the length of time former rough sleepers spend in general needs emergency accommodation. (Consultant in Public Health / East Sussex Housing Partnership, ESCC)

68. Regarding the public, 64% said that they agreed or strongly agreed but 19% said that they disagreed or strongly disagreed and 17% didn't know either way. Some comments about this reason are:

Yes, I agree, no one should have to sleep rough. (Strongly agree)

I feel strongly that suitable temporary accommodation is provided for rough sleepers, it gives them a stability of address that may allow them to regain employment etc. (Strongly agree)

I agree with this as long as those that are on this program are attending all meetings and taking correct medications etc.

Through the work that I do, I see all too often, addicts getting homes, which are them being abused and used as 'Den' when this property could be a lovely family home. (Agree)

I think you need to help the ones out that are already in a band A for a long time first. (Agree)

I do not understand what "Rough Sleepers Schemes" are. Why are people homeless? I.e.: not paying Rent, Not paying Bills, I thought Band A was for people with lots of Medical Issues and serious Health problems. There will not be much left for anybody else soon, who already are in these Bands, and others. (Disagree)

Maybe HMOs should be made available to let these clients acclimatise to living within a property and then they join the register along with everyone else. (Disagree)

In my opinion most homeless people have lived this way through choice. I cannot believe that a homeless person can come before an old person who has medical needs. You say you want to get rid of or lower putting people in temporary accommodation but I'm afraid that is needed for homeless people first. Then maybe a home later down the line. I would be really upset that after being on the housing list for over 2 years a person who was homeless was given a place before me. (Strongly disagree)

Should go on waiting list like anyone else. (Strongly disagree)

Band B – agreement with reasons to award Band B

69. We asked respondents about whether they agreed or disagreed with the proposed set of reasons why an applicant would be placed in to Band B when they joined the housing list. It should be noted that both organisations and many of the public responded with general support for the reasons but were concerned that the reasons should also be a reason to be in Band A. The main reason given for this was the likelihood that households would be placed in any permanent accommodation if they were in any Band below Urgent Needs or Band A. It is worth noting that some people disagreed because at this point they wanted the reason to be in a higher band and not because they thought the reason should not be included in any band.

Reason to be in Band B: Accepted homeless in Temporary Accommodation

70. Organisations were split on this reason. There were three that strongly agreed, two that agreed, two that disagreed and one that strongly disagreed. The remaining three respondents said they didn't know or were not sure if they agreed or disagreed. Specific comments from organisations on this reason were:

I dont quite know how to answer this question. Since no one should have to live in some of the TA accommodation currently being used at great expense to the council and downgrading them would mean them being there longer and they would be unable to get privately rented accomodation. (Bexhill and Rother Homelessness Unity Group (HUG) CIO)

I disagree that homeless households accepted into temp accommodation getting band A is 'incentivising homelessness as a route to social housing'. I think this is an insulting statement and shows how out of touch Rother council is.

Nothing 'incentivises' homelessness except the housing crisis, poverty and the recent cost of living crisis. (Friends, Families and Travellers)

Accepted homeless households in temporary accommodation - whilst the argument that this can incentivise homelessness as a route to social housing, including this category in Band B could mean longer stays in temporary accommodation for families or vulnerable people and be seen as a 'punishment' for accepting temporary accommodation in situations where applicants had no other choice. (Young Persons Housing & Accommodation, ESCC)

71. The response from the public was that 77% agree or strongly agree with this reason for Band B and 12% disagree or strongly disagree. Some comments are:

If temporary accommodation has been accepted at first offer then the applicant should have the opportunity to move to a permanent residence. (Strongly agree)

I am sceptical about the bandings in general - does anyone from band b and below ever get housed? (Agree)

Risks people getting stuck in temporary housing. What evidence is there that significant numbers of people become intentionally homeless to gain social housing? Perhaps individual applications should be screened for this rather than treating everyone as if they have acted inappropriately. How is someone in temporary accommodation, who may have already had housing debt expected to clear debt in order to be rehomed? (Agree)

May keep applicants in TA longer, I would propose a one direct offer only to those in TA especially if not accessing the choice based lettings system (Disagree)

Why are these not being placed in band A? Just because you feel the accommodation is better then nothing does not mean it's satisfactory for their living requirements. (Strongly disagree)

What about accepted homeless but those not in TA? This is not made clear. I am accepted homeless, living in one room with my nearly 3 year old son. I dont understand where I would be placed if this change were to be agreed. I disagree with this completely. (Strongly disagree)

Reason to be in Band B: Medical (high)

72. We asked respondents whether they agreed or disagreed that those with a high priority medical need would be included in Band B. (Severe and immediate medical need was proposed as a reason for inclusion in Band A.)
73. We had four organisations strongly agree and three agree. Two organisations said that they disagree. One didn't know either way. None of the organisations made a specific comment about this reason to be in Band B.
74. Eight out of 10 of the public who responded (83%) either agreed or strongly agreed with this reason to be in Band B. Medical had the highest level of support for any of the reasons to be in Band B. There are few comments specifically on this reason.

Medical and Welfare should be higher priority. Some people have no support networks. Not everyone has a family. (Disagree)

We are already in band b because of unaffordable housing and medical issues, will this change (Strongly agree)

Reason to be in Band B: Welfare

75. We asked respondents whether they agreed or disagreed that welfare should be a reason to be placed in Band B.
76. Four organisations strongly agreed, three organisations agreed and two organisations disagreed. One further organisation didn't know or were not sure either way. There were no specific comments on this reason.
77. Residents said that 78% either agreed or strongly agreed with this reason and 15% disagreed or strongly disagreed. The remaining 12% didn't know or were not sure.

Reason to be in Band B: Overcrowding

78. Three organisations strongly agreed and five agreed with this reason for being in Band B. Only one organisation disagreed and one organisation didn't know.
79. Seven out of 10 of the public (71%) either agreed or strongly agreed with this reason to be in Band B and 16% disagreed. There are few comments, however.

Overcrowding - doesn't assume people can't afford to live in HMO's etc.. could be just frugal - like you mention previously, people with children possibly making themselves intentionally homeless from a good situation...Still don't think they should be banded this high. (Strongly disagree)

If people have chosen to have more children while in social accommodation it is not down to the council to keep rehousing them if they get over crossed. (Strongly disagree)

Reason to be in Band B: Insecurely housed

80. Three organisation responses said strongly agreed, four agreed and two disagreed. One further responding organisation didn't know. There were no comments specifically on this reason.

81. For the public, 73% either agreed or strongly agreed. A further 17% disagreed or strongly disagreed and 14% didn't know. There was only one comment.

Unsure what 'insecurely housed' means. My landlord wants to sell this whole building and has put it up for sale. He didn't get lucky that time. That makes me insecurely housed when you couple it with the fact I have a big folder in my inbox entitled "Landlord / Estate Agent Discrimination". (Don't know.)

Reason to be in Band B: Armed/Reserve Forces

82. Three organisations strongly agreed, five agreed and one disagreed. One organisation didn't know or was not sure. There were no comments.

83. For residents, this question had more comments but was not as strongly supported at 71% compared to other reasons. Those that disagreed were 17% of the responses and the remaining 12% didn't know. Comments were:

I "Strongly agree" with Category 6. A last "Armed or reserved forces" have come into play, many being Homeless, some for some time, well done R.D.C. for thinking about these very brave people and don't I know it!!

Armed forces should always be top of the list due to the fact that they have shown the commitment to the country. (Disagree)

I do not feel that being a member of the armed forces should be a reason as to why you're prioritised over someone who is not. Your occupation should be irrelevant. Matters such as overcrowding, welfare, health, housing conditions, all things that no individual has control over. (Disagree)

I do not agree that armed forces should have any priority. The others speak for themselves. (Strongly disagree)

Armed forces should be Band A and not Band B. They have served our country so give them some respect. (Strongly disagree)

Reason to be in Band B: Unsatisfactory housing conditions

84. For this reason only two organisations strongly agreed and four agreed. However, three organisations disagreed and one didn't know. There were no comments.

85. Residents responded with 74% either agreeing or strongly agreeing and that left 17% saying they disagree or strongly disagree and 9% didn't know. There was one comment on this reason.

Why are these not being placed in band A? Just because you feel the accommodation is better than nothing does not mean it's satisfactory for their living requirements. (Strongly disagree)

Band C – Reasons to be in Band C

86. We asked respondents if they agree or disagreed with the proposed four reasons to be placed in Band C. The majority of those responding from local

organisations agreed or strongly agreed with all four reasons. One organisation consistently answered they didn't know if they agreed or disagreed because they didn't understand and they 'didn't know anyone in Band C who has been accommodated'. One person responding for an organisation strongly disagreed with all the reasons because they questioned how many in band C have been housed, that only households at the top of Band A are housed and the severe lack of housing stock negates this change as worthless.

87. However, resident felt a little differently. While the greater majority agreed with the reasons of homeless prevention and welfare, support was not as strong for Right to Move and the majority opposed the inclusion of intentional homelessness.
88. An explanation of the various reasons are in Appendix A, which contains explanatory text from the survey.

Reason to be in Band C - Homeless prevention

89. Eight of the respondents from local organisations either agreed or strongly agreed with the inclusion of this reason. One person disagreed and one didn't know. Comments were:

Positive incentive for applicants to accept PRS with the security of being able to remain on the housing register which appears to be a barrier for many individuals. (Agree)

Yes they need housing, homelessness is not acceptable. (Agree)

If homeless prevention isn't higher banding, they will fall into homelessness. (Disagree)

For the public, 82% said that they agreed or strongly agreed and only 9% disagreed or strongly disagreed. Here are a few example comments:

Homeless Prevention should be higher! (Strongly agree)

Mediation services should be provided for homeless prevention. (Strongly agree)

I agree that homeless prevention is important, especially if someone isn't able to stay in their current home (Welfare). However if someone makes themselves homeless, I'd have a lot of questions. (Agree)

Reason to be in Band C - Intentionally homeless households

90. Nine respondents from organisations either agreed or strongly disagree and one person strongly disagreed and one didn't know. There were no specific comments.
91. From the public, 48% agreed or strongly agreed and 39% disagreed or strongly disagreed. The remaining 13% didn't know or were not sure. Here are some example comments:

If someone intentionally makes themselves homeless why should the council be obliged to re-accommodate them. (Disagree)

Nobody is intentionally homeless!! (Disagree)

I would not help the intentionally homeless at the expense of the more deserving. (Strongly disagree)

Intentionally homeless hh? If that's what it says on the tin - why is it here AT ALL? Certainly shouldn't be above Band D!!! (Strongly disagree)

I disagree with if you have made yourselves internally homeless then they should be in a much lower band. Band c is encouraging more to do this as a way of getting housed. (Strongly disagree)

Reason to be in Band C – Welfare

92. Seven local organisation respondents either agreed or strongly agreed and two disagreed or strongly disagreed. Two respondent didn't know or were not sure. There were no comments.
93. For residents, 76% answered agree or strongly agree and 11% answered disagree or strongly disagree. Also, 14% answered don't know/not sure. There were no specific comments on welfare.

Reason to be in Band C - Right to move

94. Nine respondents from local organisations either agreed or strongly agreed. One respondent strongly disagreed and one didn't know or was not sure. There were no comments.
95. From residents, 63% answered agreed or strongly agreed, which is majority support but somewhat lower than most other supported reasons. There was more disagreement at 23% with the remaining 14% undecided. Below are the comments explaining why.

What is this 'right to move' category. (Disagree)

Not sure what 'right to move' is (Don't know)

Right to move needs to be a higher band as this is for employment needs should be one direct offer within reasonable distance to the employment. Be interested to know how many applications are received and placed into a band for the right to move. (Disagree)

Change to Band C – Removing Applicants needing sheltered housing

96. We asked respondents if they agreed or disagreed with removing applicants needing sheltered housing with no other housing need from being a reason to join Band C. Those applying for sheltered housing with another housing need or reason to be placed in a band would still be eligible, based on their other needs. This was removing a reason, or rather a group of people would no longer be eligible.

97. Six respondents from local organisations either agreed or strongly agreed. Two further respondents disagreed and strongly disagreed. Two respondents said they did not know. Their comments for their reasons were:

Social housing County-based needs should cover this issue. The county should have allocated nursing homes or assisted living in place for this. It should not be a priority for Districts who are not meeting their own targets. (Strongly agreed)

I am aware of several people who need the support of sheltered housing, some in TA and others in housing association housing. (Agreed)

How else will the vulnerable group access this accommodation? This could lead to greater demand via homelessness as planned moves could not take place. (Don't know)

98. In terms of residents, only 44% agreed with removing this group from eligibility. 36% disagreed and 20% didn't know either way. Some comments with reasons for their response were:

To have sheltered housing you need prove that you need sheltered housing. If you can't prove this then remove the applicant. (Strongly agree)

The older persons will have accommodation for them whether it's a nursing home care home or their own place. whereas others need to be sheltered and not necessarily have the option for a care home etc. (Strongly agree)

They can be looked after in a sheltered accommodation such as care homes and have more of a social life with this in effect. (Agree)

No. Sheltered housing is probably important. (Disagree)

Why should they be dropped from the list. If they have got to the time of life where they need the security of others, around them and have always lived in the area they should be offered the chance of this type housing. Too much discrimination in these changes. (Disagree)

There is no other clear pathway to sheltered housing so how else can they get into it. (Strongly disagree)

I need to live near my children who live in Bexhill I am 71 years old. (Strongly disagree)

From what it says in the draft, these people are not vulnerable. (Strongly disagree)

Applicants needing sheltered house should not be removed, as sheltered accommodation may well come up more quickly than that needed for young families. (Strongly disagree)

Look after the elderly you savages. (Strongly disagree)

Why penalise the older generation?

If in PRS and meet the local connection rule, let them at least have some Hope of securing more affordable accommodation.

I feel this is discrimination (strongly disagree)

Because older people need sheltered housing, this would stop older people going into care homes. (Strongly disagree)

This one is hard, say that they are in a 3 bedroom social housing and need sheltered housing then you would be gain back a family property. Honestly I feel that it should be on a personal bases with each case being looked at before the design of no need (Don't know/not sure)

There is no alternative affordable sheltered housing. Therefore, those who have arranged and paid for own housing while able (at significantly higher costs than social housing) are disadvantaged again if they require support in later life. (Don't know/not sure)

People who have a home should not automatically be put on a sheltered housing list, they should seek help from social services or their own family. (No answer to agree/disagree)

Band D – Agreement with these new categories to be in Band D

99. We asked respondents if they agree or disagreed with the proposed four reasons to be placed in Band D. The majority of those responding from local organisations agreed or strongly agreed with three of the reasons but the majority disagreed with the family local connection. However, the majority of the public who answered the survey agreed with all four reasons. An explanation of the various reasons are in Appendix A, which contains paragraphs from the survey.

Reason to be in Band D - Refused main duty or 'final offer' reasonable accommodation

100. Eight of the respondents from organisations said they either agreed or strongly agreed with this reason to be in Band C. One respondent said they disagreed and two respondents from organisations said they didn't know or were not sure. There were no related comments.
101. 68% of the public responded that they agreed or strongly agreed and 22% had disagreed or strongly disagreed. The remaining 10% didn't know.

Beggars can't be choosers! (Strongly agree)

I assume you are put in band D because of being low priority .This speaks for itself. However I do not agree on how many offers someone is made before they are dropped to this level. Just because people are on the social housing register does not mean they can't decide if a place is right for them or not. This is why people bid, because they think they will like the property. If when they see it it's not what they expected they should still have the right to refuse. (Agree)

But it should be longer than 6 months if they are not willing to help themselves then I feel it's unfair to those who do everything. It should be band d for

12months this is more acceptable if they are not willing to help themselves.
(Strongly agree)

No one should be able to refuse to take reasonable accommodation - if they are desperate it would at least give them some stability. (Strongly agree)

If an applicant turns down a direct offer place, it may be for a good reason that the Housing Officers don't accept as good enough, and I am concerned that it may be used in bad faith. Transport is a good example if there are kids or the applicant is a volunteer. (Disagree)

If refused a suitable offer of accommodation duty should be fully discharged, why reduce the bans then allow the applicant back on the register I cannot see the sense in this. (Strongly disagree)

Whilst I am all in favour of those that are housed, finding their forever home. I am not in favour of those that are homeless being able to refuse a property and have the attitude of "wait the six months and see what happens" attitude. I think this method will be a long battling process. In my opinion, if you're homeless and you want to be off the street and have a roof over your head, you'd take what's on offer. (No answer)

Reason to be in Band D - Deliberate or unreasonable refusal to cooperate with personalised housing plan

102. As above, eight people from organisations either agree or strongly agree. One organisation disagreed and two didn't know. There were two specific comments from organisations:

I don't think these things are as black as white as this. There can be many reasons for what is perceived as non co-operation; these decisions should be made on an individual basis and with liaison with agencies that might know the people involved. (Disagree)

Whilst somewhat agreeing to all four reasons recognition of vulnerable groups of people who may require additional support to fully co operate and understand the processes in regards to final offers and what is classed as 'deliberate' or an 'unreasonable' refusal to co operate will need to be given as well as a need to look at these on a case by case basis or partnership approach before such a decision is made where other services are involved such as Children's Services. (Don't know)

103. From residents, 77% agreed or strongly agreed with this reason and 11% disagreed. The remaining 11% did not know or were not sure either way. Some example comments were:

I would make the sanction 12 months, not 6. Not much changes in 6 months so they wouldn't miss out on much. (Agree)

But it should be longer than 6 months if they are not willing to help themselves then I feel it's unfair to those who do everything. It should be band d for 12months this is more acceptable if they are not willing to help themselves. (Agree)

Are there adequate checks to establish these actions? This seems to significantly shift power in relationship towards local authority. This is already obviously an unequal relationship should you not work with individuals cooperatively? How quickly will people be downgraded? Those who are most vulnerable seem to be at most risk (Don't know)

No - these people clearly have no respect for the housing list or the people stuck on it! Why the hell should they get the chance to go back to bandings they've abused!?!

** IF the above reasons are going to be in Band D - then people like me - who have MANY housing needs that you don't think matter - should NOT be!! Either that or get a bin - Band E - for the abusers of your system!! **

I'm SO ANGRY, DISTRESSED AND UPSET that you think it's ok to class me as 'no housing need' and dump me in here with people with no respect for rules!!!

I have recently been in contact with the office of our local MP and I will be forwarding you my letter to him via your 'consultations' email address.

One of the replies received today told me you'd suggested the 'tenant finder scheme', why? I looked at the page and it's for landlords!? (Don't know to all reasons)

Reason to be in Band D - Family local connection

104. Three respondents from organisations replied 'agree'. Six respondents either disagreed or strongly disagreed. One respondent didn't know either way. Most of the comments in this section were on family local connection.

It is difficult for applicants to be able to understand authority's rulings at times but ,perhaps there is no choice to bring about a solution. (Disagree)

The local connection can be complicated due to the transient nature of the client group I work with. Having said that there are Gypsy, Roma and Traveller's living in settled accommodation in Rother District. (Disagree)

Family local connection is the only way into housing for many vulnerable members of society including Gypsies, Roma and Travellers. (Strongly disagree)

May as well take them off the list, at Band D they would not be housed. (Strongly disagree)

105. Residents responded with 68% agreeing or strongly agreeing and 23% disagreeing or strongly disagreeing. The remaining 9% didn't know or were not sure. Example comments are below but only from those that disagreed because those that agreed did not explain why:

I don't think family connection only should be put in band D they may have other problems with being homeless which should give them more priority. (Disagree)

Family important, and mental health. (Disagree)

Seems band D is no hope category
Families should be together especially elderly relatives (Strongly disagree)

Older people need to be near family to avoid the cost of carers to the council.
(Strongly disagree)

Reason to be in Band D - Deliberately worsened own housing circumstances

106. Those that represented local organisations answered that eight agreed or strongly agreed and one strongly disagreed. One didn't know or was not sure. There was one comment as follows from the outreach worker at Friends, Families and Travellers:

Disagreed with last two- I have already outlined about the family local connection.

After working with vulnerable people for the last 6 years I don't think I've ever seen anyone who has ever 'deliberately worsened own housing circumstances'. I have seen people who don't understand the complicated housing process, people who are traumatised or suffering with ill health and make decisions that they see is the best interest for their families. This statement is judgemental and vague and leaves a lot of leeway for unsympathetic housing officers to take advantage.

107. From the public, 75% agreed or strongly agreed and 16% disagreed or strongly disagreed. The remaining 9% didn't know or were not sure. There was one comment about why a respondent agreed with this reason to be in Band D:

if it can be proven that they have deliberately worsened their own conditions then they should be put in a lower category.
it is not fair on the rest of us. (Agree)

Agreement with auto-bidding for homeless applicants

108. We asked respondents if they agreed or disagreed with the proposal to change the policy on auto-bidding for homeless applicants. The majority of organisations agreed and the majority of residents/applicants agreed.

109. For organisations, six respondents strongly agreed or agreed and two responded that they didn't know. Comments were as follows:

It saves applicants from consistently looking at a list and anticipating a house. Auto Bidding criteria need to reflect the location of schools and the suitability of the number of bedrooms. Also having properties available would help. (Ewhurst PC)

This can be useful especially for people without access to technology, but how many of us would like to not have control in choosing where we live.
I think this option should be optional. (HUG)

Would failure to respond or a refusal of a property lead to a discharge of duty?
(Sage Homes)

110. From residents, 71% said that they agreed or strongly agreed and 16% either disagreed or strongly disagreed. Example reasons were:

Makes sense and stops cherry picking of areas and properties. (Strongly agree)

Absolutely, for anyone who did not intentionally make themselves homeless. I don't know if the council's definition of that is as standard though. (Agree)

consideration needs to be given as to what kind of home they would be given. (Don't know)

You cannot expect homeless applicants to move well beyond 10 miles if there support network is over that. Mental health needs to be looked at here. (Disagree)

If they cannot or will not bid themselves, too bad! (Strongly disagree)

I don't think the council should bid for me, there are some properties I would not bid on because the rent is higher than private rent. (Strongly disagree)

people are not going to settle in an environment that they do not like but homeless people should be grateful to get something but some choice should be allowed (Strongly disagree)

Agreement with Priority date changes

111. We asked respondents if they agreed with proposed changes to how applicants were given their priority data, around when dates changed when moving between bands. All except one person responding from an organisation agreed with this proposal and the remaining person didn't know.

This is a must. People being on the list for over 2 years need a reassessment and given an indication as to how long they should wait. If on Band A they at least stand a change. Bands B-D I see little point unless an oversupply of Social Houses. (Ewhurst PC)

I can see advantages and disadvantages in this. (HUG)

112. The majority of responding residents/applicants did agree with this proposal at 58% saying they agreed or strongly agreed and 24% saying they disagreed or strongly disagreed. The remaining 18% were not sure. Comments on reasons for responses were:

everyone needs to be treated fairly. (Strongly agree)

The date you first applied should stay if circumstances change and you go up a band you end up going to the bottom of the list bit unfair. (Strongly agree)

A change in circumstances should not effect the priority date, for example, I'd been on the waiting list for eighteen months when my condition meant i had to go on oxygen .because of that i lost the eighteen months and my claim was from the date i notified them of my change in circumstances. (Disagree)

I believe that all dates that the person has been bidding in each band should be taken into account. (Strongly disagree)

Moving up date is fair to others.

The moving down date is not fair to others in that band! You are surely moving someone down as a result of something negative the applicant has or hasn't done? - so why let them keep their date and be above others in that band? Maybe this should be a case by case basis. (Strongly disagree)

Ability to develop Local Lettings Plan

113. We asked whether respondents agreed or disagreed with the council keeping the ability to develop local lettings plan in a set of listed circumstances.

114. All of the respondents from local organisations either agreed or strongly agreed. Comments were:

A must. Gives a balanced community without S106 interfering as is the case in Westfield. Purchase or rest of a good stock would go a long way to reduce the lists. (Ewhurst PC)

Another pragmatic suggestion but may fall foul of legal challenges if the decision making is not transparent enough. (Unnamed business)

This sounds OK (HUG)

Retaining the ability to develop local lettings plans will support the council to create mixed and sustainable communities. (Public Health/ES Housing Partnership, ESCC)

115. Residents and applicants were in a strong majority agreement at 72% saying they agree or strongly agree. Only 14% said they disagreed or strongly disagreed and the remaining 15% didn't know. Some example reasons given were:

It sounds fair. (Strongly agree)

Sensible to control numbers (Strongly agree)

Feel housing need should outrank village connection. (Strongly agree)

People should be prioritised for having a positive tenancy history. Too many places are given to single parent families who abuse it, wreck the property & are a nuisance to neighbours. (Agree)

Armed forces should be given priority. (Agree)

If plans are essential (more people than properties) it should therefore support as many people as possible. (Agree)

I disagree with age restrictions. (Disagree)

Age restrictions are problematic. Need not social or demographic factors should be the key factor. (Disagree)

This is social engineering. This also suggests that you plan to "protect" villages from residents linked to Bexhill? Are those. With links to the local villages discriminated against if housing is available in town? (Disagree)

Other Policy Comments

116. We asked for final comments on anything not already covered in the questionnaire.

117. The other comments from organisations were:

The real issue is surely the lack of suitable houses. The District Council needs to rent, buy or build houses to assist in the reduction in the real numbers. A cull and reassessment of need should take place annually all the while there are large numbers in Band A. Bands B-D are pointless as there is currently no chance of them being housed all the while numbers are high in Band A.

RDC must increase its Social Housing stock. More care should be given to vulnerable families where children are involved. Mobile Homes, although not for permanent use could be utilised in real emergencies for 50 weeks in the year. The families should be prioritised and Mobile homes used as an emergency. (Ewhurst Parish Council)

You might want to check the standards of some of your temporary accommodation. Though it's clear the council wishes to reduce the amount of temporary accommodation, while it is being used, it should be monitored in terms of actually being habitable.

You may already know this though. (Unnamed business)

Etchingam Parish Council resolved at its meeting on 17th August 2023 to fully support all the changes currently proposed in this Housing Allocations Policy.

It is becoming increasingly difficult for those who are living nomadically and are some of the most vulnerable members of society to move into housing. Many of these changes will make it very difficult and could be considered racially discriminatory towards Gypsies, Roma and Travellers. (Mental Health, Friends, Families and Travellers)

The proposed changes highlight several potential areas of good practice. It would be helpful if learning from this approach is shared across the 5 housing authorities, to help build a consistent approach across East Sussex. (Consultant in Public Health / East Sussex Housing Partnership, ESCC)

118. In addition, we had these emails:

I write on behalf of Icklesham Parish Community Land Trust Ltd.

We are in broad agreement with the objectives of the policy.
The board suggests that an additional clause be added:

“In all cases where the accommodation to be allocated is subject to any form of planning condition limiting who may occupy the accommodation, the allocation shall be made so as to ensure compliance with that planning condition.”

Thank you for inviting Camber Parish Council to take part in this consultation and I confirm that this has been considered by full Council.

Councillors' views are that it is vitally important that local people are considered first for any new houses in Camber. The local connection is a high priority for any available housing in the Parish.

Camber has an ever-increasing number of holiday homes and holiday lets and whilst this provides employment in servicing these properties it also means that young people cannot remain in the village as there is a lack of housing available to them under the current situation with the increase in the cost of properties which is out of their reach.

It is important that there is sufficient rental accommodation available for local people so that they are not placed in a position that they need to move away from the village and therefore the planned development at the old putting green site should be built with a condition that it remains as rental accommodation for local people in perpetuity and does not have the opportunity to be used as holiday accommodation in the future.

Conclusion

119. Firstly, we thank all those organisations and individuals that took part in the consultation for their time and trouble.
120. We note that almost all parts of the policy and proposed changes have majority support. However, the change for the family local connection is not supported by local organisations while it has majority support from the public.

Questionnaire explanation text

This text is copied from the printed version of the questionnaire. There were questions about the proposed changes in between sections of text. Those questions have not been included because they are covered in the main report. Other text not included are the introduction and conclusion, completion instructions, submission instructions and deadlines, and so on.

Section Two: Who can apply and can't apply

Eligible to apply with family as local connection

The current policy allows only households with a local connection and one of the local connections is people who have close family living in the district.

We propose to make a change to the family connection criteria for being able to apply to the housing list. This change would apply when the ONLY local connection that an applicant has to Rother is that they have a family member living in Rother. If they have more than one local connection it would not apply. We would consider special circumstances, as well.

The qualifying criteria regarding family local connection would be changed as follows:

'An applicant, whose only local connection is via a close family member (mother, father, brother, sister) who resides in the district and has done for a continuous period of at least 5 years, will be awarded band D and will only be considered for new build schemes in accordance with any Local Lettings Plan.'

This change is likely to reduce the number of people who qualified and where they could live. However, it should mean more housing available for other qualifying households because there would be less demand on properties.

Disqualification criteria: Debt

We propose to change the criteria for determining whether someone does not qualify to join the housing list due to Council and housing related debt.

Applicants would be ineligible if they have social housing or council related debt in arrears in excess of £600, until evidence has been provided that the debt has been paid or the applicant has maintained a payment agreement for at least the previous six months. Housing debt has always been a disqualification. We propose to change the threshold amount from £1,000 of debt down to £600 of debt.

Applicants with outstanding debts with our housing association partners are likely to be rejected for properties by the housing association until the debt has been paid in full. Exceptional circumstances may apply.

Section Three: Priority Bands

The bands determine the level of priority an applicant has when it comes to being awarded social housing. A higher priority band means they would get a home before someone who is in a lower priority band. The main changes proposed are creating a new Urgent Need Band and some changes to the bands A to D, mainly to allow for the new band.

A New Priority band – Urgent Need Band

The policy currently places households in bands A to D in order of the priority of their need for housing. We propose to change the policy to include a new Urgent Need band above the existing band A. (Other changes to the bands are in following sections.)

Eligible applicants in the Urgent Need band would be made one 'direct offer' of accommodation where social housing has been deemed as the only viable option. This means they wouldn't be bidding for property as people do in Bands A to D.

All other allocations would be made via the same Choice Based Lettings system in revised priority bands, from A to D.

The new Urgent Need category would provide greater flexibility than Choice Based Lettings currently allows, particularly in situations where there is a very urgent or immediate need to provide assistance.

The criteria for being placed in the Urgent Need band are next in the questionnaire.

Reasons to Qualify for the Urgent Need Band

We propose the following reasons why an applicant would be placed in the Urgent Need band:

Severe housing conditions - applicant considered as being in severe housing need as a result of such poor housing conditions they are presenting an immediate threat of serious injury or if life threatening, as assessed by our Private Sector Housing Team's professional environmental health officers.

Welfare - applicant is required to move on from care or supported housing or Next Steps Accommodation Pathway or Rough Sleepers Accommodation Pathway accommodation from authorised partnership schemes, where the applicant has been assessed as ready to move to independent living, and where a move on report has been provided. Applicants will only be eligible for the Urgent Need band if they have been unsuccessful in bidding in band A for more than 3 months.

Exceptional homeless households - accepted homeless households who have severe difficulty in accessing accommodation in the private rented sector, have been in temporary accommodation for 6 months or more, have engaged with council to exhaust all other options and have no housing related Council debt.

Hospital discharge - applicants who are ready to be discharged from hospital and their current accommodation has been assessed by an Occupational Therapist as permanently unsuitable.

Adapted property - a transfer applicant who would be releasing a property already adapted for a disabled person, which would make that property available for a disabled person.

Domestic Abuse - applicants fleeing domestic abuse who have been assessed under s189A of the Housing Act 1996 as (amended) and it has been determined they can't return to their property and cannot be accommodated in a refuge or temporary accommodation.

Permanent decant - applicants in a social housing property who need to be moved permanently because there is an urgent, immediate need for major repair or redevelopment of their home and they have been in band A for 6 months and been unsuccessful in bidding for a property.

Medical (severe & immediate) - awarded after advice from the council's medical advisor or county council occupational therapist, where there is an severe and immediate need to move and where the housing conditions are having a severe and immediate adverse effect on the medical condition of the applicant or member of the current household and the property cannot be adapted. For example, significant risk of falls, unable to access essential facilities, layout prevents delivery of essential services (evidence required from social care provider).

Significant risk - applicants who are homeless and require immediate rehousing as a result of fleeing violence or threats of violence, including intimidated witnesses, where it has been assessed that social housing is the only suitable option. Might be due to but not limited to race, gender, sexual orientation, mental health, physical disability, learning disability, age, religion, domestic abuse, or harassment by a current partner, former partner, or associated persons. Requires written evidence from the police or other public protection agency.

Exceptional reasons - for example, a public health emergency such as a pandemic. Cases to be agreed by the Head of Housing.

Qualifying for Band A – Section 21 Notices

We propose changes to band A that will be in line with the council's objective for greater homelessness prevention. The following criteria would continue to be reasons to be placed in to Band A, as they are now. The definitions are similar to those in the Urgent Need band but not as urgent or under the time limits.

Serious Housing Conditions	Welfare
Under Occupation	Medical (urgent)
Permanent Decant	Overcrowding
Fleeing Violence/Harassment/Abuse	

We propose to add new reasons to be placed in Band A.

The first one is - 'Applicant has been served with a valid Section 21 notice through no fault of their own, are owed the relief or prevention duty and it has been determined the council would owe the 'main duty' for housing (s193(2)).

In order to be considered applicant must be fully engaged with the council and their personalised housing plan to prevent homelessness.

At the discretion of the housing needs manager applicants may also have their priority date backdated by 12 months.'

Qualifying for Band A – Living with Friends or Family and have a Child

We propose including in band A applicants at risk of losing their home because they have to leave where they have been living with friends and family and they have a child or children.

We propose the following conditions:

'Applicant living with friends/family, is threatened with homelessness, owed a prevention or relief duty and it has been determined the council would owe the 'main duty' (s193(2));

They must have been resident with friend/family for at least 12 months prior to the birth of their child or application (and can evidence this), and are forced to share their bedroom or sleeping area with their dependent child who is over 6 month old.'

In order to be considered applicant must be fully engaged with the council and their Personalised Housing Plan to prevent homelessness.

At the discretion of the Housing Needs Manager applicants may also have their priority date backdated by 6 months.

The council will need to be satisfied there is no evidence of collusion between family members to gain additional priority. Where this is found, applicants will be treated as deliberately worsening their own circumstances and placed into band D.

Qualifying for Band A – Possession Order or Notice of Eviction

We propose adding to Band A any applicants who have been given a possession order or notice of eviction, though no fault of their own. We propose the following conditions:

'Applicant has received an outright possession order or notice of eviction from the court through no fault of their own and has fully engaged with the council to prevent homelessness.

This applies only to applicants who the council would owe the 'main duty' (s193(2)) to and have chosen not to move into temporary accommodation.'

Qualifying for Band A – Former Rough Sleeper Pathway

We propose including in Band A those applicants who are ready to move on from the Former Rough Sleeper Pathway or Next Steps Accommodation Pathway (NSAP) properties (or any authorised partnership schemes related to rough sleepers).

This accommodation is time limited for two years and therefore enables clients to move into stable accommodation.

The band reason would be as follows:

'Applicant is required to move on from rough sleeper accommodation from authorised partnership schemes where the applicant has been assessed as ready to move to independent living, and where a move on report has been provided.'

Band B – Qualifications to be placed in Band B

The current policy awards band A to households that are accepted as homeless and in temporary accommodation. This can incentivise homelessness as a route to social housing.

We propose the new policy awards accepted homeless households in temporary accommodation to band B. The amended band reason would be written as follows: Applicant to whom the council has accepted the main housing duty (s193(2)) and are residing in temporary accommodation provided by the council and have no housing related council debt.

The reasons for qualifying for Band B are proposed as:

Accepted Homeless Households in TA
Welfare
Insecurely Housed
Unsatisfactory Housing Conditions

Medical (high priority)
Overcrowding
Armed or Reserve Forces

Band C – Qualifications to be placed in Band C

We propose that the policy awards priority to applicants who are assisted by the Council into private rented accommodation as a way of preventing or relieving homelessness by putting them into Band C.

The new band C reason is proposed as follows:

'Applicant is living in private rented accommodation and was assisted into an assured shorthold tenancy with help from the council as a way of preventing or relieving homelessness (including those who have escaped domestic abuse from outside the District).'

This would mean the following band C reasons would be introduced:

Homeless Prevention
Welfare

Intentionally Homeless Households
Right to Move

One category would be deleted.

Band C – Deleted Qualification to be in Band C

In line with the Council's aim of assisting those in most need, we propose to remove the following reason to be placed in band C:

'Applicants requiring older persons sheltered housing where there is no other housing need.'

This would mean these applicants will not be on the housing list. Unless they have another housing need that would put them in one of the bands.

Band D – New Qualifications to be in Band D

We propose to introduce into the policy a new band D priority for applicants who refuse a main duty (part 6) offer or 'final' offer of accommodation.

This would be applicants who are on the housing list, in any band, who haven't taken a suitable home that has been offered to them. If they are in another band they would be put into band D for six months and could move back to their previous band after six months. The reason for being in band D would be written as follows:

'Applicant has refused a suitable offer of accommodation in discharge of the main housing duty (s193(2)) or a 'final offer' of accommodation in accordance with the Housing Act 1996 (as amended) will be placed into this band for 6 months.'

We also propose a new reason to be in band D in relation to applicants who deliberately and unreasonably refuse to cooperate with their Personalised Housing Plan.

The Homelessness Reduction Act requires applicants to work with the council to take reasonable steps to resolve their housing situation. If an applicant refuses or does not reasonable co-operate then they can be placed in band D for 6 months. Clients who are assessed as vulnerable would not be affected.

The band reason would be written as follows:

'Applicant who has been assessed by the Council as deliberately or unreasonably refusing to cooperate with their Personalised Housing Plan will be placed into this band for 6 months.'

We proposed that applicants will be put in band D for these reasons:

Refused main duty or 'final offer' of accommodation.
Deliberate or unreasonable refusal to cooperate with Personalised Housing Plan.
Family as a Local Connection (local connection is explained on page 2).
Deliberately worsened own housing circumstance.

Section Four: Other Changes

Auto-bidding for Homeless Applicants

We propose that, to ensure that homeless applicants are maximising their chances of rehousing, the following groups will be placed on to auto-bidding. This means the council will have a mechanism to automatically bid on suitable properties on the applicant's behalf.

All homeless applicants who are owed the following duties will be placed on auto bidding,

190(2) – eligible for assistance, homeless, in priority need and intentionally homeless.

193(2) – eligible for assistance, homeless, in priority need and not intentionally homeless.

195(2) – the prevention duty owed to persons who are eligible for assistance and threatened with homelessness.

189(b) – the relief duty owed to persons who are eligible for assistance and homeless.

Priority Dates

How long someone has been on the housing list is taken into account when bidding for housing. Applicants are given a 'priority date' when they were accepted on the list.

We propose that, if someone has to move down a priority band, they won't lose out on their priority date. However, if someone moves up a band, they will get a new date based on joining the new band. That way, others in that band will have higher priority because they have been waiting longer in that band.

We propose if an applicant's priority date changes then the date will be changed as follows:

- When moving down into a band the applicant has been in previously their priority date will become the date that applied when they were last in that band.
- When moving down a band into a band the applicant has not previously been in the priority date will be the original application date.
- Moving up to a higher band the priority date will be the date when an applicant is assessed as requiring a higher band.

Local Lettings Plans

Local Lettings Plans allow the Council to consider direct lets to respond to local conditions. It means we can consider balancing local communities or prioritising people with strong local connections to fit into the community. A direct let is where bidding is by-passed, and we make an offer directly to applicants that meet the plan's criteria.

The Council will use local lettings plans in the following circumstances:

- Age restrictions (for example older persons or younger persons to provide a 'balanced community').
- Giving priority to transfer applicants with a positive tenancy history.
- Giving priority to working households where there is a concentration of tenants or residents with tenancy support needs.
- Giving priority to residents with a local connection to the area (in particular in villages where community sustainability is a concern).