Appendix 1 Housing Changes Review Consultation Summary Informal Consultation 2011- 2012

Consultation Question	Summary of Responses Responded overall - 254	General Comments from Responders	Harrow Response
Where do you live now?	Responded - 209 27% of those who took part in the consultation events were Council tenants. Across Harrow as a whole, the proportion of households who are Council tenants is 5.2%. A high number of council tenants have responded due to the location of the consultation events which included road shows on many of Harrow's council owned housing estates. 7% of responders were housing association tenants. The private rented sector response at 20% of the total is representative of the level seen across Harrow. 30% of responders were private owners and 4% were leaseholders, which is somewhat below the proportion of homeowners across the borough (around 70%). Again this is likely due to the targeted locations of the road show event.		The consultation approach has meant that we have had responses from residents living in a wide range of tenures. This includes households who are currently not living in social housing and who are therefore most affected by the proposed changes relating to rent levels and type of tenancy.
	The remainder of the respondents were		

	living with family and friends (11%) or in temporary private rent (1%).		
Do you think you will need to move home in the future?	Responded - 202 57% of those who answered said yes, that it was likely they may need to move. Many were unsure of their housing options if they had to move, especially those in the private rented sector. The high number of people who said that they felt they would need to move again is likely to be due to the fact that the majority of those who responded were non home owners (around 70%). Almost 70% of 25-34 year olds said that they would need to move home again in the future making this age group the most likely to feel that they will move home. Only 31% of 55-64 year olds said yes to this question.	"I rent a room in a shared houseI am a single working woman who feels disenfranchised and does not vote would like self contained flat with affordable rent. Does not understand why housing is not more accessible to single childless people." "If I was to increase my family size I'm not sure of my options". "I would like to move from private rent to shared ownership eventually" "Yes - I'm living with family as private rent was too high and too overcrowded. I work freelance so it is difficult to demonstrate a steady income and studio apartments are at least £690 per month in Harrow."	

		"Yes, I might need to move to a smaller property because of health but I want to stay close to my family in Harrow."	
Do you think we need more affordable housing for rent, especially family housing (3 bedrooms or more)?	Responded – 229 87% of those who answered said that yes, Harrow does in their view need more affordable housing for rent. Many people were worried about the lack of larger affordable properties and the long wait for such properties especially on the council's housing waiting list. Waiting times for larger 3 bed properties in Harrow can be as long as 6-12 years depending on the applicant's circumstances and the availability of larger homes and many of those who responded were aware of the length of time they may have to wait for a suitably sized property. Within the age groups, 91% of the 65+ group said yes to this question while 81-82% of 25-54 year olds also said yes to this question. Across all tenures, 70% or more of responders replied yes to this question.	"As long as they are affordable for working people" "(Yes)provides a better alternative to the private rented sector" "I am currently in temporary accommodation (and have been for the last 10 years). I would hope to be re-housed permanently sometime in the future."	Households from all tenures recognise the importance of having affordable housing for rent and this supports housing policies in the Core Strategy as well as options included in the Housing Changes Review.

There is limited	Responded – 124	"Social rent levels might	We will undertake further work with housing associations to
funding to		be increased in line with	assess how much rents can be increased whilst ensuring
support new	The response to this question was less	comparables in the	affordability. There will be further consultation before
affordable	clear cut. There was less support for	private rented sector	recommendation is finalised.
housing	developing new affordable housing at	which might make	
development. If	higher rent levels overall (26%) and most	increase fairer overall."	
we want to	people favoured a hybrid approach of		
continue	increasing rents by a small amount to	"Any rent increases	
building	ensure affordability (37%).	should depend on	
affordable		household income	
housing there	36% of people who answered favoured	changes."	
are some	building at current rent levels.		
options to	3	"Rents should be	
consider. Which	Responses also depended on who you	increased for those who	
option do you	asked as can be seen from the equalities	can afford it so long as	
support?	analysis e.g. existing Council tenants were	the increased rent goes	
	less likely to agree to an increase in rents	towards new affordable	
	and more likely to suggest that we should	housing."	
	continue building at current rent levels	_	
	whilst those in the private rented and	"Higher rents – the	
	owner occupier tenures held the opposite	margin has to be felt by	
	opinion.	individuals."	
4. Should we	Responded - 224	"Yes, and (Harrow)	Noted that there is more to do in publicising current
help people to		should build three	schemes. The new web based targeted housing options
own their own	78% of people who responded said yes.	bedroom houses also as	advice scheme will assist with the promotion of shared
homes through		there is a demand for	ownership options.
shared	It is clear from the responses to this	such"	
ownership?	question that there is still considerable		Noted that shared ownership is an option to be included
	support for low cost home ownership in	"Not sure if it is a good	within the range of affordable housing to be negotiated and
	Harrow across all tenures.	scheme financially for the	developed.
		buyer."	
	As a follow on from question 2 above,		

	many people when asked if they thought they would have to move in the future replied saying that they would like to move into shared ownership housing once they have a sufficient deposit saved. While there appears to be a general knowledge of shared ownership, there was not much awareness of how the scheme worked in practice or the other products that may be available in Harrow. The age groups who supported people owning their homes most strongly were the 35-44 and 55+ groups.	"Yes I think this is a good idea as it ensures that there are a wider range of housing options which cover life changes."	
5. Should we encourage people to move out of Harrow in the long term if they will find more suitable and affordable housing?	Responded – 212 57% of those who responded said that yes, we should encourage people to move for suitable accommodation. Many of the people who said yes to this question were keen to stress that nobody should be forced out of the borough but should be encouraged to explore the possibility that living outside Harrow would be the best option for their long term housing stability. When the analysis was split down by tenure, it was interesting to note that those in temporary accommodation were most supportive of this option although the	"Yes but this should be by natural progression rather than by force" "Yes but this also depends on schooling. It is often hard for older children to settle if moved" "Yes but it also depends if they work and if they have children" "No – friends family etc would be isolated"	This option is proposed to be taken forward subject to further impact assessment. Agreed that the specific needs of households need to be taken into account when discussing options. There will be further consultation before recommendation is finalised.

	response level was low from this tenure. Leaseholders were the least supportive overall. Around 50% or more of respondees from other tenures replied yes to this question.	disruptive to young children and only if practical for household." "If they individual wants to, yes. People with longstanding links to Harrow should be given a choice."	
9. Which people should we give priority for affordable housing to when making allocations?	Responded – 212 Many of the people we spoke with suggested that priority should be given to people in low paid employment (56%) as well as households with a medical condition which requires the allocation of council housing (41%). Many people also stressed that the council should means test applicants and assess their rent payment records over the past number of years to ensure that those who receive the benefit of council housing respect what they have received.	"should be allocated entirely on the basis of need, not for political reasons" "People who have a good history of paying their rent themselves and being good neighbours" "People who contribute to their communities in the long terms should be recognised to a degree." "The Housing Policy in England and Wales is completed warped. It should be skewed towards helping working families who have struggled to pay their own rents for years to remain	This option is proposed to be taken forward subject to further impact assessment. There will be further consultation before recommendation is finalised.

		in temporary accommodation. They have not constituted a burden to the Welfare Bill but have continued to be penalised by being banded as low priority. Many such families (as myself) do not consider Homeownership either because of difficulty obtaining mortgages or not being able to afford to buy a suitably sized family home. So social rental is the only viable option."	
10. Do you think the council should continue to provide services to help all homeless people find a private rented home?	Responded – 157 81% of people said yes to this question and it was generally considered that people should be presented with their options and rights. As can be seen from the general comments made in response to this question, some people felt that it was highly important that the council offered an options service as some people would not be in a position to help themselves. Existing Housing Association tenants were most supportive of continuing to provide	"should meet certain criteria (for help) e.g. character and willingness (to help themselves)." "It is important that people are presented with their options as not all people are willing or able to go out and find out their rights, so yes, the council should continue to help in this regard or there may be more people on the street."	Noted and it is proposed that this service is continued. Enhancements to existing face to face service are already underway through introduction of the web based Targeted Housing Options service.

	the service while existing council tenants were the least supportive (less than 50% said yes).	"Should all be vetted from the start including previous tenancy history and behaviour, some people will not help themselves through disruption."	
11. Do you think we should encourage or enforce higher standards in the private rented sector?	Responded – 152 85% of those who responded to this question supported Harrow in encouraging higher standards in the private rented sector. Many people who were living in the private rented sector at the time of the consultation indicated that at the lower end of the market landlords may be renting out below standard properties due to the high demand in this sector. Perhaps unsurprisingly, those living in private rented and temporary accommodation were most supportive of improving standards in the private rented sector.	"Yes but there are limits to what the council can do with the private sector?" "Yes I have looked at places which are expensive and very poor quality" "Standards in the private rented sector should be the same as that of the social sector."	We propose to review how the Council can improve private rented sector housing standards.
Informal Consultation – Harrow Single Homelessness Forum 17	Consultation on draft Homelessness Strategy 2013-2018		

October 2013			
	Approximately 20 people attended the forum representing a number of organisations helping single homeless households.		Harrow will continue to develop services for single homeless households, often in partnership with the other West London Housing Partnership, over the lifetime of this strategy.
	The majority of attendees agreed with the draft strategy's principles but felt there were gaps in the strategy regarding single homeless households and the council's provision of services.	Partners around the table said in their experience the number of rough sleepers in the borough is higher than the official count referenced in the	Rough sleeping counts are single night snapshots of the number of people sleeping rough in local authority's area. The results of the count will differ on another night. We carried out another count in late November 2012, which returned a similar result to that contained in the strategy.
		strategy	Noted. We will work with partners to ensure that where rough sleepers have been identified, they are assisted through the services provided by the Council and partners.
		Unrealistic to expect rough sleepers to remain in one place for more than 1 night	We will review our services as part of monitoring the homelessness strategy. The rough sleeper count carried out in November 2012 did not return a high number of rough sleepers living in the Borough.
		Surrounding borough's such as Watford have better provisions of	

		services for rough sleepers than Harrow	
Tenants Leaseholder and Resident Consultative Forum (TLRCF): 4 th December	Consultation on draft Housing Strategy, Tenancy Strategy, Tenancy Policy, draft Homelessness Strategy, draft Private Sector Housing Strategy and draft Housing Allocation Scheme. Attendance by representatives from	Supported the intention to develop additional affordable housing including using garage sites, derelict sites and car parks.	Notes. This is a key objective of the Housing Strategy.
2012	eight tenant, leaseholder and resident associations.	Questions on whether we intend to move local people out of Harrow so that people can move in from inner London	This is not the intention. Some families may have to move out of Harrow as under the new benefit rules they will not be able to afford to live in Harrow. There is no evidence that families are moving from inner London to Harrow in large numbers as Harrow is also expensive. The revised Allocation Scheme gives a higher priority to people who have moved out of the borough compared to households living in temporary
		How will we support people to help them move back if they want to?	Over 21s would not need to move from their current housing where they are living with their family. However, having children aged over 21 would not increase priority for a move to larger social housing.
		Where will the over 21s live as there isn't any other housing for them? (Relates to	Noted. The Private Sector Housing Strategy sets out the Council's commitment to bringing empty properties back into use.

		change in assessing overcrowding under the Allocation Scheme) Agreed it was important to bring all empty residential properties	
		back into use and use the media to improve awareness of the problems and solutions.	
Learning Disability Partnership Board – 6 December 2012			
	A presentation and discussion was held with 13 people at the Board meeting, on the draft suite of strategies. Attendees said they would respond to the formal consultation, but generally	"felt that there is a real danger that people will get displaced, and will have a significant impact on carers and LD service users".	The government's benefits cap will impact on about 700 Harrow households. Families will have to contribute to the shortfall in benefit from other income and/or move to cheaper accommodation, which in most cases will be outside of Harrow.
	were in agreement with the objectives set in the strategies.		Priority action 5 in the Homelessness strategy already addresses the needs of LD service users through the Supported Accommodation Strategy.

Summary of Formal Consultation Outcomes (Consultation period 2 January 2013 – 27 February 2013) and proposed amendments

Consultation period 2nd January, 2013 – 27th February, 2013
HFTRA 17 January 2013
Affordable Delivery Housing Group meeting: 24th January, 2013
Voluntary Sector consultation event: 6th February, 2013
Private sector tenant consultation group: 14th February, 2013

Harrow Weald TRA 6 February 2013

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
	Responded overall – 98		
	36 questionnaires were received as at 27/02/2013.		
	18 attendees from 11 organisations were represented at the Voluntary Sector consultation event held on 06/02/2013.		
	Harrow Council wrote to 66 tenants placed in the private rented sector through the Council's Help2Let service since January 2012 inviting them to respond to the consultation. 8 tenants attended a private sector tenant consultation event on 14/02/2013.		

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
	Consultation with the Affordable Housing Delivery Group took place on the 24/01/2013. Representatives from 7 housing associations were in attendance.		
	Consultation with HFTRA at a meeting on 17 th January 2013 (15 resident representatives)		
	Consultation with the Harrow Weald TRA at a meeting on 6 February 2013 (9 resident representatives)		
	270 private sector landlords were contacted and invited to respond to the consultation. 5 landlords responded.		
	Housing Association responses received from Genesis, Home Group and Metropolitan Housing Associations.		
	GLA – no response received as they are only commenting on local authority Tenancy Strategies (for which comments were received on the Harrow Tenancy Strategy).		

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
HOUSING STRATEGY			
Q6 Do you agree with the facts and figures and do they summarise the current issues for Harrow?	30 Questionnaire responses 11 respondents to the questionnaire agreed with the facts and figures (37%). 6 (20% said they disagreed and 13 (43%) said they were unsure. There were no patterns in the demographics of people responding to this question.		
Q6a Are there any others we should highlight?	10 questionnaire responses Respondents felts greater support is needed for childless couples and singe people on low incomes, and service/ex service personnel. Other comments regarding issues that should be highlighted include updated information on housing stock by size and tenure – this would help to manage expectations.	"The cogent issue is the imbalance between the number of households requiring permanent social housing and available stock"	The Council provides advice and support to single people and childless couples through its Housing Advice service and targeted housing options advice. This is detailed in the Homelessness Strategy . However most of these options relate to help in finding private sector housing due to the low supply of social housing. The priority for new affordable housing will continue to be directed at meeting the needs of families with young children or vulnerable single people. In accordance with new legal regulations service and ex service personnel will have a higher

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
			priority under the proposed new Allocation Scheme
			A table or graphic highlighting the housing stock tenure issue will be included in the revised Housing Strategy.
Q7 Do you agree with the seven objectives?	30 Questionnaire responses 14 respondents to the questionnaire agreed with the proposed objectives (46%). 5 (17% said they disagreed and 11 (37% said they were unsure. The majority of the responses from the various forums supported the proposed objectives. There was concern that the objectives are too ambitious. There no patterns in the demographics of people responding to the question.		No change proposed to the seven objectives. They need to be challenging and ambitious to assist the Council in engaging partners including government agencies in delivering them.
Q7a If not, how would you change them?	8 questionnaire responses and suggestions from the various forums: • Develop a strategy to enforce lower private rents • Provide greater support for	"Use available brownfield sites and protect greenfield sites for the benefit of residents inside	These comments are addressed in our response to the Private Sector Housing Strategy .

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
	 Private tenants Recruit a Tenancy Relations Officer to deal with tenants facing harassment, illegal evictions etc – easing the pressure on the voluntary sector Share resources with local volunteer organisations and other agencies to tackle homelessness Add an objective about supporting tenants to live independently in their own homes Flexible tenancies may lead to a loss in community cohesion, loss of support for families More reference to social rent within the strategy Increase social rented stock in Harrow Concern raised about how to measure the impact of the strategy eg "Excellent service" Lack of detail about how the council and its partners were going to achieve their stated 	and outside of the borough" "More affordable 3 bed houses to buy or rent are needed"	The Housing Strategy has been amended to make clear that we continue to do this. Flexible tenancies were approved by Cabinet in December 2012 following informal and formal consultation. The outcomes of the consultation were reported to Cabinet in December 2012. 5 year fixed term flexible tenancies will be introduced in April 2013. The impact of these will be monitored. Increasing the supply of affordable housing, including social rent, and ensuring a proportion are family homes is a key objective of the housing strategy. The action plans have been reviewed to ensure the impact and aims can be monitored and

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
	aims		achievement tracked.
Q8 What other actions do you think we should be doing to help meet our objectives?	 11 questionnaire responses and suggestions from various forums: Redevelop old council estates Develop affordable 3 bed houses to buy or rent More funding to enable more social housing 		The action plan has been amended to make clear we are looking at all of these options as part of a Development Options project which will conclude in April 2013.
	Greater support for working people		The proposed Allocation Scheme revisions given higher priority to low paid working families
	Greater emphasis on homelessness prevention		The homelessness objective has been amended to reflect this and the details of how we are doing this is contained in the Homelessness Strategy
	Partnership work with other local		The Housing Strategy will be amended to include reference in particular to the work we do through

Consultation Question	Summary of Responses	Comments from Responders	Harrow Response
	authorities to deliver housing – more detail needed within the strategy		the West London Housing Partnership (WLHP)
	Absence of any details in section 6 on support that could be given to single vulnerable households		No change necessary. Section 6 refers to supported housing for vulnerable adults, which includes single vulnerable households. Details of how we will continue to support the single homeless, including Rough Sleepers is included in the Homelessness Strategy.
Q9. Do you have any comments on the Equalities Impact Assessment (EqIA)?	8 questionnaire responses: • Impact testing should include data on the number of low income households and struggling due to the cost of housing • Impact upon adult children if not part of the household and also remaining household members should adult children leave		The EQIA will be updated although note that the Council has limited data on low income households struggling due to the cost of housing unless in receipt of HB and identified as facing a loss in HB as a result of welfare reform.
Any further comment on the Housing Strategy?	4 questionnaire responses	"pooling of resources to make in roads to solving the problem"	The strategy has been amended to make reference to the Harrow HELP scheme to be introduced from April 2013.

HOMELESSNESS	Summary of Responses	Comments from Responders	Harrow Response
Q11 Do you agree that the objectives and priority actions set out in the homelessness strategy are the right ones?	31 Questionnaire responses 14 (45%) respondents to the questionnaire agreed with the proposed objectives and priority actions. 5 (16%) said they disagreed and 12 (39%) said they were unsure. There were no patterns in the	•	As the majority of respondents agreed with the objectives and priority actions in the strategy. No changes are to be made to the strategy at present.
	demographics of people responding to this question. The majority of the voluntary sector forum agreed with the proposed objectives		
Q11a If not, how would you change them?	10 questionnaire responses 1- Housing should take proactive measures to find the hidden homeless to mitigate future pressures on council resources 2- Housing Advice and prevention strategies - how is this monitored?	'5 years gives no one any stability and creates transient communities.' 'Reward those trying to do better' 'The Councils should	The number of people waiting for social housing increased by 4% between April 2011 and 2012, whilst the turnover of social housing has remained roughly the same. 1 – the council's homelessness service already carries out a lot of preventative work. We will continue to work with partners and other council services such as children's services to identify
	3- Reasons for discharging homelessness duty into the private rented sector should be	have a transparent and accessible policy as to who and how the	any households who may be in hidden. 2 – Change to Action plan to include specific action on monitoring the strategy under priority

Vol • (c • t I Mo Lor	clear 4- Strengthen links with other organisations working with the homeless luntary sector responses Concerns that priority actions may have long term damaging consequences The vulnerable will be hit hardest by the benefit cap and moving out of London. oving out of London will leave and on gentrified and will also have an exact on the areas they are resettled	decision is reached to discharge into the private rented sector'	action 6. The homelessness strategy will be monitored quarterly by the steering group to ensure that it is delivering on the objectives and priority actions. 3 – Priority action 2 in the strategy sets out the reasons for discharging into the PRS. No change will be made to the strategy. 4 – We will keep partnership working under review over the lifetime of the strategy. Changes to the strategy will be made at the appropriate review date. Welfare reforms introduced by the government will mean that families reliant wholly on benefits will have to make difficult financial choices if they remain in Harrow. If they gain employment, then the caps will not be applicable potentially giving them a wider choice of housing in Harrow. Appendix 1 sets out the circumstances to be considered when determining a decision. Change: We will develop an [interim] policy on affordability to calculate what housing a family can afford. This will allow for consistency with our Tenancy Strategy and Allocations Scheme, in the absence of an (nationally or regionally) agreed methodology.
Q12 Are the prevention 27	questionnaire responses		No changes to be made to the strategy.

services and support identified in paragraph 22 the right ones?	14 respondents to the questionnaire agreed with the proposed objectives (52%). 2 (7%) said they disagreed and 11 (41%) said they were unsure.		However, we will keep our prevention services under review and amend as necessary over the strategy's life.
	There were no patterns in the demographics of people responding to this question.		
	Voluntary sector delegates highlighted the need for closer working relationships between the council and other agencies providing support.		
Q 13 Is something missing?	 8 questionnaire responses A full time tenancy relations officer in to enforce against rogue landlords A review of the voucher scheme for single homeless people 2 voluntary sector delegates thought there should be a rent deposit scheme or improvement to the voucher scheme for single homeless people. 		Further details on enforcement action are contained in the Private Sector Housing Strategy. The council's preferred approach is to work with landlords to improve conditions and where this happens then to use enforcement powers. The PSHS has been amended to include the councils role in publicising the rights and responsibilities of both tenants and landlords. The single homeless voucher scheme is one which Harrow pioneered and it is being taken up by other local authorities. We will review the voucher scheme as part of the regular monitoring of the strategy.
Q14 Are there any other actions which the council should be developing or	12 questionnaire responsesDevelop more social housingDevelop measures to prevent the	'More options for growing families to buy shared	The overarching housing strategy contains details of how the council wishes to increase the supply of new affordable housing.

taking in order to prevent homelessness?	loss of council stock Create a tiered system of help for identified homeless people, working with the other agencies in Harrow to work out what these should be Voluntary sector responses Proactive approach to tackling homelessness eg. engaging more effectively with landlords seeking to evict tenants A more accessible housing advice service and restoration of the drop in service	'Tackle those already sleeping rough by working with local charities' 'More than half of the homeless people we have found have been taking shelter in Harrow Bus Station. There should be some signage at the station giving details of who to call.'	The council can not prevent a tenant from exercising their Right to Buy, but we are scoping alternative options The Council recently moved an appointment based system for providing advice and assistance to homeless households in response to customer complaints about the amount of time they were having to wait in the cramped reception. The service never turns away genuine emergencies on the day. As part of this realignment of services, we continue to carry with our preventative work. We will continue to develop the housing advice pages on the council's website.
Q15. Do you agree with our action plan?	29 questionnaire responses 13 respondents to the questionnaire agreed with the proposed action plan (45%). 6 (21%) said they disagreed and 10 (34%) said they were unsure. There were no patterns in the demographics of people responding to this question. The majority of the voluntary sector forum agreed with the proposed action		One change will be made to the action plan to ensure that monitoring and review of the strategy as an action is included

	plan		
Q16. Is there anything else we should be doing?	 9 questionnaire responses Overnight homeless shelter all year round Help working people 	'Spend more time and money helping those who do not present themselves to the Council.'	The council participates fully in the regional "No Second Night Out" and "None Left on the Streets" systems for reducing and dealing with street homelessness. The Allocations scheme, Tenancy Policy and Housing Strategy all set out how the council will assist those either in employment or those seeking employment. The working homeless will not be affected by the benefit cap.
Q17. Do you agree with the proposed policy in Appendix 1?	27 questionnaire responses 11 respondents to the questionnaire agreed with the proposed objectives (41%). 4 (15%) said they disagreed and 12 (44%) said they were unsure. There were no patterns in the demographics of people responding to this question. Voluntary sector response: Most agreed with the proposed policy for housing people outside London.		No change to be made as most respondents agreed with the policy.
Q17a If not what changes would you make?	 4 questionnaire responses All relevant agencies involved in one overarching strategy on homelessness Voluntary sector response 	'Priority should be given to creating more affordable rented accommodation for people already living in Harrow'	The council recognises that partnerships will need to continually develop in order to respond to emerging challenges. The criteria and assistance for out of London offers will be kept under review. Change: New action to ensure that Homelessness strategy steering group

	Most agreed that the criteria for housing people outside the borough were broadly correct and, because of the government's welfare reforms, a necessary and proportionate response. One suggested that the council should cover removal and resettlement costs from the discretionary housing payments fund.	"Young people should not have to move out of London if it's all they know."	membership is reviewed annually an other agencies invited to become part of steering group.
Q18 Any further comment on the homelessness strategy?	 10 questionnaire responses Build more houses for families Allocate fairly – being a volunteer does not equate to having a greater housing need. Voluntary sector responses Concern that the equalities impact assessment adequately recognises the impact that moves out of London could have on members of particular ethnic groups that may want to live in the same area. In terms of affordability, families should be expected to use their income to meet at least some of their rent shortfall following welfare reform. 30% maximum contribution is necessary, given the budgetary constraints to the council. 	'More work needs to be done with those already homeless.'	No Change. The supply of new housing is addressed through the Housing Strategy. Whilst the allocation of social housing is addressed in the Allocation Scheme. The equalities Impact Assessment is being revised to take into account comments received to date. Where households are being offered accommodation outside of Harrow, we are looking at areas which are best suited to its demographics. The council has already started work to engage families affected by the welfare changes, and most families are willing to consider the different options.

	Households with children will find it more difficult to afford 30% - those families with more children can benefit from the economies of scale. Should the 30% be a sliding scale, or more discretionary?		
PRIVATE SECTOR HOUSING STRATEGY			
Q19 Do you agree with the five proposed objectives?	28 questionnaire responses 13 respondents to the questionnaire agreed with the proposed objectives (46%). 5 (18%) said they disagreed and 10 (36%) said they were unsure. The remainder did not respond to this question. There were no patterns in the demographics of people responding to this question.	"incentivise resident landlords who are willing to provide rooms in their homes"	No change to the Strategy is necessary as the majority of respondents supported the objectives proposed in the private sector housing strategy. Harrow Council is not in a financial position to acquire market-rent properties at the current time. As with all services, Harrow continually seeks to improve how empty properties are identified and addressed. The Strategy has been updated to reflect this.
	One respondent suggested that the Council acquire more market-rent properties to meet the housing need in the borough. Respondents agreed that Harrow should work with private sector tenants, and only resort to enforcement as a last resort. One respondent said Housing should consider nominating to people with	"The Council does not have to implement its punitive powers" "Many flats above shops remain empty, but do not show up on the figures as they can be exempt	

	Spare rooms in their homes. One respondent highlighted the difficulty in identifying empty properties above flats, and that this may affect the Council's ability to meet its objectives. Voluntary sector consultation event: all responding attendees agreed with the proposed objectives. Private sector tenant consultation event: tenants agreed with the proposed objectives. They considered partnership working as the most important aspect of the proposed approach. Private sector landlords: four respondents indicated that they agreed with the proposed objectives. One landlord (20%) was unsure about the proposals.	from Council Tax. I think these properties should be targeted by the 'empty homes' team." "I would like to say that I agree with the laid out initiatives and hope that Harrow Council keeps to its proposals".	
Q20 To what extent do you agree that the Council should encourage the supply of new homes in the private rented sector?	31 questionnaire responses 18 (58%) questionnaire respondents agreed with the proposal and 5 (16%) respondents disagreed. 8 (26%) respondents were unsure about the proposals. The remainder did not		The responses support Harrow's proposal to encourage the supply of new homes in the private rented sector. The Strategy has been amended to reflect the Council's continuing and innovative ways to do this. The Council has a continued responsibility to

respond to this question.

There is some evidence that older respondents were most likely to agree with these proposals; 67% of those aged 25-44 disagreed with or felt unsure about the proposals.

Voluntary sector consultation event: 82% of responding attendees agreed with this proposal, and encouraged the council to seek innovative ways to do this. The minority who did not agree were concerned that a focus on increasing supply in the private sector would reduce the number of social homes developed.

Private sector tenant consultation event: all tenants recognised the value of private sector homes and agreed with this proposal. Whilst social housing was their aspiration, all attendees agreed that they could be content with private sector accommodation.

Private sector landlords: two landlords commended the Help2Let service and one suggested it should be expanded. One landlord suggested that the

manage the expectations of people wanting council accommodation, particularly younger residents. The Strategy has been updated to reflect this.

Whilst Harrow wants to increase the supply of private sector homes, it will also continue to work with social housing partners to develop properties. This is outlined in the Council's draft Housing Strategy.

Help2Let offers a leasing scheme for landlords where and offer full a management service as part of this. The Strategy and action plan outline that Help2Let will continue to seek ways of increasing the number of landlords using the service.

"Help2Let is a very good service with proactive staff"

Q21 Are there any other ways we could support and encourage private landlords to invest in: a. maintaining and improving their property condition? b. The energy efficiency of their properties?	Help2Let service should include elements of property management. One respondent highlighted that longer-term, well-managed tenancies, and the secure income that this provides, may promote landlords to investment in properties. The importance of improvement grants and incentives (and the publicity of these) was raised. Two respondents highlighted the importance of enforcement to achieve higher standards. One respondent noted that minimum property standards could form a requirement of a landlord licensing scheme. Voluntary sector consultation event: attendees indicated the importance of financial assistance to achieve this objective. It was agreed that enforcement action should be used as a last resort in these cases, and two	"Secure rental of property, help with problem tenants" "If you give them money or legislate to require this then they will improve their property" "Increase awareness through better communication" "It should be a requisite of a licence"	Harrow Council's Help2Let service promotes long-term tenancies and provides a management service for private landlords. Harrow Council wants to deliver this service to more private landlords, and this is outlined in the draft Strategy. The draft Strategy, and the "Delivering Warmer Homes" Strategy shortly due for publication, outlines that the Council will promote access to financial incentives to improve private rented properties. The Strategy outlines that the Council will take enforcement action where necessary to promote higher property standards. The team's resources are currently being reviewed and the Strategy outlines how enforcement fees are being introduced. The council is also considering the feasibility of other ways to improve property standards, such as selective licensing, to improve private sector property standards.
	financial assistance to achieve this objective. It was agreed that enforcement action should be used as		introduced. The council is also considering the feasibility of other ways to improve property standards, such as selective licensing, to improve
	Health team should be properly resourced for this. Several people commented that the council should have a role in raising awareness to landlords and tenants about their		Harrow recognises that it has a role in publicising the rights and responsibilities of both tenants and landlords. The Help2Let service will also continue to provide high-quality services to landlords and residents, and compete with a

obligations.		minority of poorly performing letting agents. The
		draft Strategy has been updated to reflect this.
Private sector tenant consultation		
event: tenants were concerned about		
the conditions of some private rented		
properties, but agreed that Harrow		
should try to work with landlords to		
achieve higher property standards		
before considering enforcement action.		
They agreed that the accreditation		
scheme formed a good basis for this		
work. All tenants agreed that they		
would prefer to rent a property through		
Help2Let than through a lettings agent		
or landlord, as in their experience		
Help2Let properties tended to be to a		
higher standard. Tenants also		
suggested that Harrow should better		
publicise tenants rights, including to		
community groups, and that the tenant		
information sessions organised by		
Help2Let should be promoted more	"I . I . I	
widely.	"I would request	
Private sector landlords: landlords	for landlords that	
	show themselves to	
agreed with the approach. One landlord suggested that Help2Let	be responsible	
should continue to promote longer	parties, longer	
leases. Another landlord emphasised	leases that give	
the importance of tenants	greater security to both parties"	
understanding their responsibilities.	voin parties	
anasistanang their responsibilities.		

Q22 What other actions should be considered to help remove the worst landlords from the private rented sector?

Four respondents suggested that fines be imposed on landlords who let substandard properties, followed by court action where necessary.

Four respondents suggest that the Council should regularly inspect private rented properties (e.g. against a predefined standard) and publicise this.

One respondent suggested that the Council recruit a Tenancy Relations Officer, and a further respondent suggested that Harrow compulsory purchase properties that are unfit or charging extortionate rent.

Voluntary sector consultation event: all attendees generally agreed with the plans outlined in the draft Strategy. One delegate suggested that licensing may help to remove the worst landlords from the private sector.

Private sector tenant consultation event: tenants generally agreed with Harrow's proposed approach. One tenant had found Environmental Health very helpful when she had problems, and all agreed that the Council should better publicise how it can help tenants "Fine them heavily, press for maximum penalties"

"Environmental Health should be using all their enforcement powers"

"Constant monitoring of their properties with penalties for not complying". The draft Strategy outlines how Harrow Council's Environment Health team will take enforcement action where necessary to tackle bad landlords. The Council is introducing fees for landlords when enforcement notices are served.

Whilst the Council does not have the resources to conduct inspections of all private rented properties, the Strategy outlines how the environmental health team will continue to investigate complaints made about specific properties and take action where appropriate. The Council will continue to monitor and review its approach and, as described above, consider the feasibility of a selective licensing scheme of private landlords. The Strategy has also been changed to highlight that the Council will review the extent of the "beds in sheds" problem in Harrow and will consider what action is appropriate.

As above, the draft Strategy has been updated and Harrow will better publicise what it can do to help tenants experiencing problems with bad landlords.

	experiencing problems with landlords. All attendees agreed that tenants should raise issues with their landlords first, and seek help from the Council afterwards, if necessary.		
Q23 Any further comment on the Private Sector Housing Strategy?	Respondents raised concerns the high rents encountered by some tenants in the private sector. One comment was made that assured shorthold tenancies generally offered by private sector landlords do not provide the stability and security required by tenants, and particularly those with children. One respondent suggested that private sector stock could be better utilised by offering cash incentives to owner-occupiers to take in a lodger. One respondent, who was a private sector landlord, indicated that their experience with letting a property through Help2Let had been problematic. Private sector tenant consultation event: all tenants agreed that private rented homes did not offer security for households, particularly those with children. One attendee suggested that	"It's the people having to fork out for extortionate rents that need the help". "The changes in Council Tax Support mean that people who might be willing to rent out rooms in their own homes will be disincentivised to do so if the new rules mean that taking in a tenant will mean they have to pay more Council Tax"	The draft Strategy and action plan have been amended to emphasise the Council's role in promoting more stable tenancy conditions for tenants. The Council will work with private landlords to achieve this. Harrow believes that additional income should be sufficient enough an incentive to encourage residents to take in a lodger. Harrow Council will continue to work to improve relationships with its partners, and the Private Sector Steering Group will lead this.

5 year tenancies were a solution, and that this would have wider benefits (e.g. for educational attainment). The majority of attendees (87.5%) agreed that this was the most important issue for them, over location and property condition, and that they would be far more content to live in the private sector if they had more security. Voluntary sector consultation event: two delegates highlighted that there is scope for a better working relationship between voluntary agencies offering support and the council. This may improve the chances of tenants being offered a tenancy in the private sector. Private sector landlords: one landlord's "I would like to thank response revealed that there was Harrow Council for its action to involve scope to improve the relationship with landlords, and the relationship between private landlords for landlords and tenants. Another their opinions" landlord's comments suggested a good relationship between landlords and the Council.

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q24 Do you agree with our intention to reduce waiting time for people in the most need by reducing the number of households we aim to assist?	31 questionnaire responses 17 (55%) respondents to the questionnaire agreed with the proposed intention. 9 (29%) said they disagreed and 5 (16%) said they were unsure. Of those who agreed with the intention, 53% were Council tenants and 63% were between 45-64 years old. Some delegates at the voluntary sector group were not in favour of the intention. There was concern that reducing the number of people we aim to assist acts to hide the demand for low cost housing.	"Allocation should not be restrictive but must be open to all applicants in need of housing" 'the only fair way to allocate is to those in the greatest need.'	We are making a technical change so that those with lower housing need are excluded but can register and access online targeted options. Their needs and reasons to move are recorded, so we can monitor the demand while targeting the most needy for an allocation without the need for anyone to wait an unacceptable length of time.
Q25 Should public rented housing (it housing owned by the council and housing associations in Harrow) be reserved only for those with a high recognised housing need?	32 questionnaire responses 16 (50%) respondents to the questionnaire agreed with the proposed intention. 11 (34%) said they disagreed and 5 (16%) said they were unsure. There were no patterns in the demographics of people responding to this question. Voluntary sector forum response: Need to define what this is and who has defined this? How does this fit in with balanced communities?	"The council has a duty to allocate housing to those applicants in the greatest housing need. The fact that low paid employment and or volunteers may be given reasonable preference should not obviate from this duty."	Our proposed scheme is quite innovative in that it adds to the legal definition of housing need ("reasonable preference") by including working households suffering financial hardship (i.e. poverty). This should help to restore some balance in allocations currently dominated by homeless households and those containing someone with a disability.

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q26 Should people who have lived in Harrow for less than 5 years (with certain exceptions) be excluded from registering?	 34 questionnaire responses 17 respondents to the questionnaire agreed with the proposed intention (50%). 9 (26%) said they disagreed and 8 (24%) said they were unsure. There were no patterns in the demographics of people responding to this question. Voluntary sector forum response: Some agreed with the principle but not with the timescale – should be half the proposed length Not going to have people move into the borough, so this could be good Need to be consistent with other boroughs, so introduce a timescale that is consistent across London otherwise it will lead to people moving into boroughs that have the shortest residency requirements If an applicant has lived in Harrow for 5 continuous years within their lifetime, and can prove this, this rule should not apply to them The rights of freedom of movement and human rights of homeless households could be breached. 	"You [Harrow] house all and sundry with no local connection". "You cannot put a time of being a resident of Harrow as a criteria for receiving some form of help". "[The proposal will] remove from the council's list those vulnerable rough sleepers who may have a significant support system in Harrow"	All W. London boroughs introducing a 5 year (in Hillingdon's case 10 year) residence requirement. We do not propose to water down the residence requirement to include those who may have lived here at some point in the past, unless there is some relation to housing need (see below)*

ALLOCATION SCHEME		Responders	
best option. There Harrow. People's human rig	st many rough sleepers with private rented sector accommodation the fore we will amend the scheme to prevent disqualification of rough support of the scheme to prevent disqualification of rough support of the scheme to prevent disqualification of rough scheme to p	sleepers with a previo	ous 5 year local connection to the borough – we are simply saying
Q27 Do you agree with the length of residence (5 years) proposed?	33 questionnaire responses 13 respondents to the questionnaire agreed with the proposed intention (40%). 12 (36%) said they disagreed and 8 (24%) said they were unsure. There were no patterns in the demographics of people responding to this question.		We are amending the scheme so that those with less than 5 years residence, although still excluded, will be able to register their needs and access their on-line housing options.*
	 Voluntary sector forum response: People on the waiting list should be given plenty of notice if a maximum 5 years residence is introduced. The notice period would mirror other boroughs to be effective and to avoid a migration of applicants in the borough. 		

Comments from | Harrow Response

Q27 continued

Summary of Responses

^{*} We do not propose to alter the transitional relief offered under the scheme. All those people protected under the transitional relief proposals will have been resident in Harrow for at least 5 years except for those awaiting 1-bedroom non-sheltered, who may only have been here for 2 years. The transitional arrangements do not protect those people who have not lived in Harrow for 5 years but make an exception of those waiting for 1-bedroom who have waited for 2 years or more but have lived in Harrow for less than 5 years. The wording of the scheme has been slightly altered to clarify this point.

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q28 Should the definitions of overcrowding and medical need be reviewed and tightened up so that fewer people are recognised as needing public rented housing?	 31 questionnaire responses 15 respondents to the questionnaire agreed with the proposed intention (49%). 10 (32%) said they disagreed and 6 (19%) said they were unsure. One respondent, a council tenant, thought it unfair that her priority should be lowered, having waited 5 years for a bedroom for her 16 year old daughter, who currently shares with her 10 year old son. There were no patterns in the demographics of people responding to this question. Voluntary sector forum response: Blanket overcrowding policy may mask the various needs of the household eg children are most affected by overcrowding, disabled children often need their own bedrooms The new policy should not lead to the disqualification of formerly homeless single parents with one child who were moved out of bed and breakfast accommodation within the last two years into 1 bedroom council flats on the assurance that they could retain their original band C priority date to bid for 2-bedroom accommodation 	"our most severely overcrowded households should receive extra priority [but this risks] sending out the wrong message to future applicants. Anyone who is only 1-bedroom deficient can have another child and vastly improve their chances of being re-housed. Therefore I think this should only be a transitional arrangement"	Transitional protection will apply to those overcrowded by 1 bedroom who have been waiting for a 3 bed home for 7 years or more. To extend this to those waiting 5 years would add so many people to the protected group as to make the new policy unworkable. We have put safeguards in the scheme to prevent people from gaining by deliberately overcrowding themselves.*

ALLOCATION SCHEME	Summary of Responses	Responders	narrow Response		
within a year of imp any change is need simple overcrowdin	We also propose to monitor both possible and unforeseen outcomes of these major changes very closely and to make changes to the scheme within a year of implementation as necessary to meet the objectives and to retain balanced and sustainable allocations. We do not consider any change is needed to the proposal at this stage. Household disabilities are prioritised according to medical and welfare criteria, rather than simple overcrowding rules. We will change the criteria for transitional protection to include the 20 (?) families moved from bed and breakfast to 1-bedroom council homes				
Q29 Should low paid working people with young children who are experiencing financial hardship have access to public rented housing?	29 questionnaire responses 23 respondents to the questionnaire agreed with the proposed intention (79%). 2 (7%) said they disagreed and 4 (14%) said they were unsure. There was also strong majority agreement with this aim from the Voluntary Sector Forum	"Help people who work for a living for once, not people living on benefits".	No change to the proposals is necessary as the majority of respondents supported the objective.		
	There were no patterns in the demographics of people responding to this question.				

Summary of Responses

Comments from Responders

Harrow Response

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q30 To what extent do you agree with the proposed criteria for assessing this?	25 questionnaire responses 13 respondents to the questionnaire agreed with the proposed criteria (52%). 4 (16%) said they disagreed and 8 (32%) said they were unsure. There were no patterns in the demographics of people responding to this question.	Only one consultee suggested that the working criterion should be used to help a group other than the proposed families with a primary school aged child; they wanted us to prioritise working single people and childless couples	We will monitor the criteria used carefully, especially after the planned benefit changes take effect, as this may result in many more people becoming liable for housing costs in excess of 50% of total income.

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q31 Should people with young children who spend a lot of time volunteering in the community and who are experiencing financial hardship have access to public rented housing?	31 questionnaire responses 18 respondents to the questionnaire agreed with the proposed intention (59%). 2 (6%) said they disagreed and 11 (35%) said they were unsure. There were no patterns in the demographics of people responding to this question.	"Allocation should not be determined by community work." "People with young children who are experiencing financial hardship probably haven't got time to spend in extensive voluntary work." "how you measure the contribution to the community should be looked at more closely."	We propose removing this feature from the draft scheme, because it appears fraught with assessment difficulties.

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q32 What do you think of the proposed criteria for assessing this?	27 questionnaire responses 11 respondents to the questionnaire agreed with the proposed criteria (41%). 3 (11%) said they disagreed and 13 (48%) said they were unsure. 7 out of 10 people aged 25-44 were unsure of the proposed criteria.	" we would need to know that they had been volunteering for a considerable time otherwise it could just become a way to get extra priority and could be given up when they are rehoused."	We will include a question on the on- line application form so that we can determine how many people are likely to be affected by the criterion. This will enable its reintroduction, backed by more data, in a future review of the scheme

ALLOCATION SCHEME	Summary of Responses	Comments from Responders	Harrow Response
Q33 Any further comment on the Housing Allocation Scheme?	 16 questionnaire responses including the following not already mentioned above: Adopted children have a high need to have settled housing. Concerns by several respondents about the impact of excluding adult offspring from the calculation of overcrowding and the number of bedrooms needed by a family. The high priority the scheme gives to underoccupiers met with responders' approval. 	"Please review impact upon adult children if not part of the household and also remaining household members should adult children leave – especially if they are the main income earners for that household."	While not disputing the undoubted needs of adopted children we would dispute the contention that settled housing can only be public rented housing. The maximum income level will apply to homeseeker and transfer applications. Thos above it will be encouraged and helped to access low cost home ownership.
	 Voluntary sector forum response: Concern that the overcrowding policy does not count adults aged 21 and above and are not recognised as additional priority for overcrowding. The current financial climate means it is difficult to move out. In addition, it does not account for cultural practices, where living with extended families into adulthood is normal practice. The scheme is complex and delegates from Citizens Advice and Harrow Law Centre were concerned about explaining it to applicants. Could the maximum income level dissuade tenants from improving their financial situation or job prospects? The scheme should include expected waiting times. 	"Is removing children with high debt from university fees to live outside the family home a reasonable thing to do?"	

Ī	Summary of Responses	Comments from	Harrow Response
	ALLOCATION	Responders	·
	SCHEME	•	!

Q33 continued

We apologise for the complexity of the scheme and hope to be able to simplify it on review, when more relevant data will be available.

We are not proposing to remove adult children from the household. It is up to each family how it responds, by balancing economic and overcrowding considerations. The EQIA has been be updated to include a consideration of this issue.

The scheme does include expected waiting times and one of the objectives of close post-implementation monitoring will be to check whether the times given are correct and realistic.

Equalities:						
Age Groups						
	What is your age group?	Total				
	25-44 years	10				
	45-64 years	15				
	65 years & over	5				
	Total	30				
Disabilities						
	Are your day-to-day activities li problem or disability which has least 12 months?	mited because of a h lasted or is expected	alth to last at	Total		
	No			20		
	Yes, affecting hearing			1		
	Yes, affecting mobility			5		
	Yes, affecting mobility; Yes, aff health	ecting hearing; Yes,	iental ill-	.		
	Yes, affecting mobility; Yes, me	ental ill-health		3		
	Yes, mental ill-health	intai iii ricaitii		1		
	Total			31		
Gender						
	Ara you 2	Total				
	Are you? Female	18				
	Male	14				
	Total	32				

enure					
	Tenure		1		
		Total	1		
	Council tenant	6	1		
	Freeholder; Owner occupier	1			
	Head of household	5		l	
	Head of household; Council tenant	7			
	Head of household; Leaseholder	1			
	Head of household; Leaseholder; Owner occupier	1			
	Head of household; Living with family/friends	1			
	Head of household; Living with family/friends; Owner occupier	1			
	Head of household; Owner occupier	2			
	Leaseholder	1			
	Living with family/friends	3			
	Living with family/friends; Freeholder; Owner occupier	1			
	Living with family/friends; Owner occupier	1			
	Private tenant	1			
	Total	32			

Ethnicity					
Litinoity	What is your ethnic origin?		Total		
	Asian or Asian British - Any other As	sian background - please			
	specify below		2		
	Asian or Asian British - Indian		2		
	Asian or Asian British - Pakistani		1		
	Black or Black British - African		1		
	Black or Black British - Somali		1		
	Mixed background - White and Blac	k Caribbean	1		
	White or White British - Albanian		1		
	White or White British - Any other W	hite background - please			
	specify below		1		
	White or White British - English		16		
	White or White British - Irish		5		
	Total		31		
Gender					
reassignment					
		<u>. </u>			
Is your gender	Is your gender identity the same				
identity the same	as the gender you were assigned	l ₊			
as the gender you	at birth?	Total			
were assigned at	Yes	31			
birth?	Total	31			
Marital status					
	Are you married?	Total			
	No				
		15			
	Yes	17			
	Total	32			

Pregnancy and				
maternity	Have you been pregnant and / or			
	on maternity leave during the past			
Pregnant and/or on	2 years?	Total		
maternity leave	No	28		
during last 2 years?	Yes	1		
	Total	29		
Sexual orientation				
	What is your sexual orientation?	Total		
	Heterosexual	26		
	Other - Please specify below	2		
	Total	28		
Faith				
	What is your religion?	Total		
	Buddhism	1		
	Christianity (all denominations)	13		
	Hinduism	2		
	Islam	3		
	No religion / Atheist	8		
	Other - please specify	1		
	Total	28		