

Appendix A - Southwark intermediate rent housing list consultation feedback report

Southwark Council has proposed introducing a new intermediate rent housing list to assist with the allocation of intermediate rent housing products. The list would not be used for shared ownership which would continue to be allocated through the Mayor of London's online portal. More information is set out in the July 2019 Cabinet Report.

Cabinet directed officers to publically consult on proposals for the intermediate rent housing list in December 2017. The consultation on the intermediate rent housing list ran from 25th July 2018 to the 18th November 2018. The consultation covered the eligibility criteria, priority star system and some questions about what should happen at the end of a fixed term tenancy where circumstances had changed.

The main method of consultation was the web-based consultation document. The internet, press releases and social media were used to try to raise awareness of the consultation. Officers also wrote to developers and key worker organisations to encourage their feedback. Officers also met directly with existing groups such as the Southwark Housing Association Group (SOUHAG), the Futures Steering Board (FSB), Tenant Council, Homeowner Council and TMO Liaison Committee. Announcements were also made at Community Councils and this consultation was included in Community Council newsletters/Facebook pages etc. The Council also met with officers from the GLA.

In total 90 online responses were received along with five responses which did not use the consultation questions. These were from

- 35% Campaign
- Southwark Defend Council Housing
- British Land
- Travis Perkins
- Southwark Law Centre

Comments were also made at Tenant Council, Futures Steering Board, Southwark Homelessness Forum and Southwark Housing Association Group.

All comments received, have been anonymised and included below, and restructured where required around the questions asked in the consultation.

Some of the comments made were in relation to the P4 Policy in the New Southwark Plan, rather than specifically on the eligibility and priority system. Many of these comments had already been made on the New Southwark Plan consultation. These comments were shared with the relevant teams but have not been included here, as this report is focused on how the intermediate housing list should operate.

There were also eight emails from households enquiring how to join the list (which gives an early indication of how popular this scheme could be, given that it has not gone live yet).

Monitoring responses

Overall there was a good spread of responses from different tenures, ages, ethnicities, sexualities, religions and disabilities. Male respondents were under represented. There were not really enough responses to drill into what a particular group felt.

Question 19: In what capacity are you responding to this survey?

Option	Total	Percent
Council tenant/housing association tenant	27	30%
Private tenant	34	38%
Home owner	13	14%
On behalf of a housing association	1	1%
On behalf of a private developer	0	0%
Other – (please give details below)	12	13%
Not Answered	3	3%

There was 13 other responses, these included

- Two Southwark Council Councillors (of different parties)
- A business owner
- An intermediate rent tenant on a Peabody Estate
- Shared ownership resident
- A former council renter
- Homeowner but also a housing journalist
- Key worker X4
- Living with parent
- Housing Association staff X2 (Peabody and L&Q)
- University lecturer

Question 21: Age

Option	Total	Percent
Under 16	0	0%
16-17	0	0%
18-24	1	1%
25-34	34	38%
35-44	25	28%
45-54	15	17%
55-64	8	9%
65-74	1	1%
75-84	1	1%
85-94	0	0%
95+	0	0%
Not Answered	5	6%

Question 22: Disability and health

Option	Total	Percent
Yes, limited a little	14	16%
Yes, limited a lot	1	1%
No, not limited	70	78%
Not Answered	5	6%

Option	Total	Percent
Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)	1	1%
Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)	7	8%
Mental health (lasting more than a year. e.g. severe depression, schizophrenia etc.)	7	8%
Learning difficulties (e.g. dyslexia, dyspraxia etc.)	0	0%
Memory problems (e.g. Alzheimer's etc.)	0	0%
Not Answered	77	86%

There were two additional comments which were ADHD, and Visual impairment and Recurring depression.

Question 23: Ethnicity

Option	Total	Percent
White British	26	29%
English	2	2%
Scottish	0	0%
Welsh	2	2%
Northern Irish	0	0%
Irish	2	2%
Gypsy, Roma or Irish Traveller	0	0%
Other European	8	9%
Other White	7	8%
Black British	14	16%
Caribbean	3	3%
Nigerian	1	1%
Ghanaian	0	0%
Sierra Leonean	2	2%
Somali	0	0%
Other African	1	1%
Other Black	1	1%
Asian British	1	1%
Indian	0	0%
Bengali	0	0%
Chinese	2	2%
Pakistani	1	1%
Vietnamese	0	0%
Filipino	0	0%
Any other Asian	1	1%
White and Black Caribbean	3	3%
White and Black African	0	0%
White and Asian	2	2%
Other mixed background	0	0%

Arab	0	0%
Latin American	1	1%
Any other ethnicity	2	2%
Not Answered	8	9%

Q24: Religion and Belief

Option	Total	Percent
Christian	36	40%
Sikh	0	0%
Hindu	0	0%
Muslim	3	3%
Jewish	3	3%
Buddhist	1	1%
No religion	33	37%
Other	5	6%
Not Answered	9	10%

Question 25: Sex

Option	Total	Percent
Male	19	21%
Female	63	70%
Not Answered	8	9%

Question 26: Gender reassignment

Is your gender identity the same as the gender you were assigned at birth?

Option	Total	Percent
Yes	65	72%
No	15	17%
Not Answered	10	11%

Question 27: Sexual orientation

Option	Total	Percent
Heterosexual/straight	63	70%
Lesbian/Gay woman	3	3%
Gay man	7	8%
Bi-sexual	2	2%
Not Answered	15	17%

Question 28: Pregnancy or maternity

Option	Total	Percent
Yes	3	3%
No	77	86%
Not Answered	10	11%

Eligibility

Question 1a: Do you agree with the proposed eligibility criteria?

Option	Total	Percent
Yes	63	70%
No	25	28%
Don't know	2	2%
Not Answered	0	0%

Recommendation: To broadly keep the proposed eligibility criteria but with some minor adjustments.

Question 2: Should there be a minimum residency requirement - if so, for how many years should they have been required to live in Southwark?

Option	Total	Percent
Yes	52	58%
No	29	32%
Don't know	8	9%
Not Answered	1	1%

Where a figure for the number of years was given, the breakdown was as follows

Years	Count
1	6
2	12
3	15
5	10
7	1
10	4

Summarised comments included:

- Perhaps it should be a local connection
- This would exclude people who work but don't live in the borough X2
- Years working in Southwark should take priority
- London in a fluid place and borough boundaries don't relate to real life
- No residency requirement but priority for local residents
- There were a number of comments in other questions saying that local residents should be prioritised.
- Two households felt the residency criteria should link to those who formally lived in the borough and were priced out, and those living in neighbouring boroughs.
- One person felt those working in the borough for over 3 years should gain additional priority.
- One respondent felt that the residency requirement should extend to one mile from any property built, even if this was across the borough boundary.

Recommendation: To require a three year residency requirement (except for key workers and those fleeing domestic abuse).

Question 3: Should the residency requirement be waived for key workers?

Option	Total	Percent
Yes	48	53%
No	24	27%
Don't know	6	7%
There should not be a residency requirement for any type of household	12	13%
Not Answered	0	0%

Recommendation: To waive any residency requirement for key workers working in Southwark.

Question 4: The proposal is for a minimum £26,000 household income threshold. Is this threshold:

Option	Total	Percent
Too high	19	21%
About right	46	51%
Too low	10	11%
There should not be a minimum income threshold	15	17%
Not Answered	0	0%

- There were 13 comments that the proposed minimum income threshold of £26k was too high. These comments tended to also refer to single people or single parent households and many mentioned low paid key worker roles of less than £26k, such as teaching assistants, nurses etc. One person asked “What about those on incomes below this level who would not get social housing given the demand.”
- A comment from a teacher was that this minimum income was too low.
- One comment was that if somebody would not qualify due to their income increasing they could be discouraged from taking a pay rise.
- One person argued that the rent should be linked to the income, taking into account the number of dependents.

Recommendation: Even though the minimum income criteria being about right had the highest number of ticks at 51.1%, 21.1% said this was too high and a further 16.7% felt there should be no income threshold. So 37.8% are effectively opposing this income threshold. In reality people below this level are going to struggle to afford a London Living Rent level rent so this minimum threshold should be retained but updated annually.

Question 5: Should a household be able to bid for a property with more rooms than they need? (e.g. single person bidding for a two-bed property)

Option	Total	Percent
Yes	25	28%
No	56	62%
Don't know	9	10%

Not Answered	0	0%
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In the additional comments one respondent said there could be a case where a separated parent needs an additional room for the child to visit.

Recommendation: Most respondents said people should only be able to bid for a property with the number of rooms they require, so this is the recommended option but with some discretion where they may be special circumstances which means an additional room is required.

Question 6: Should two or more unrelated individuals (e.g. friends) be able to share the rent of a larger property?

Option	Total	Percent
Yes	70	78%
No	15	17%
Don't know	5	6%
Not Answered	0	0%

There were a few comments on the sharing idea. Some felt that families should be prioritised first. Other comments were that this should be encouraged as it could help multiple individuals to then save up and buy somewhere.

Recommendation: To allow individuals to be able to come together to share the rent on a property.

Question 7: Do you have any other further comments on the eligibility criteria?

There were 46 comments in response to this question in the survey but quite a few were not really about the eligibility criteria and strayed in to other areas. Where possible these comments have been moved to those sections. The following is a summary of the points in relation to eligibility, including the emailed responses.

Maximum income cap comments

- Two people commented that the maximum income thresholds were too high (both the £60k and £90k caps).
- Another felt the cap was a bit arbitrary and rents should be linked to incomes. They felt it was unfair somebody earning say £60,001 would not qualify.
- Another felt £60k was too high as they felt there were options in the private rented sector for people on this income level.
- The 90k threshold should be removed.

Eligibility – Sharers

- It would be appropriate for a proportion of homes to be specifically aimed at sharers and for the landlord to be responsible for management of this (i.e. each tenant would have their own tenancy). This approach often means that intermediate rent homes can serve those with lower incomes who may not be able to afford to rent a one bedroom property on their own. For example, the Council’s consultation document

states that Ambulance Crew earn an average of £18,000 which is below the Council's proposed £26,000 minimum income to be eligible for a home. However, 2-3 people with an £18,000 income each would be likely to be able to afford a share of a 2/3 bedroom home (recognising that some flexibility on the size of discounts to market rent exists).

- Whilst the products included in your list could be inhabited by sharers, the household income (including the combined income of all occupants) should not exceed the £60k income cap set by the Mayor of London.

Other comments on eligibility

- One comment was against the homeowner clause as it says about being not an existing homeowner and unable to access the private rented sector. So this implies anybody who could access the private rented sector should be excluded.
- Two comments were that there should be priority for those who had been on the council's social waiting list for a long time (such as overcrowded households).
- There was a comment in relation to domestic violence which said that some aspects like the residency requirement and income threshold might need to be waived.
- One respondent felt British born key workers should receive additional priority to stop them moving abroad.
- A few comments related to concerns about properties being sublet or used as Air BnB type lets so protections need to be built in.
- Embedding the principle that affordable homes should be accessible to those whose household incomes fall under £60,000 is critical.
- We believe the minimum income threshold should also be lowered to provide greater access to this scheme for individuals in essential services working in London to keep the capital's economy moving.
- We oppose rent levels set at the London Living Rent (around half of the private market rent) for those on household incomes below £60,000 or rents at up to a maximum of 80% of the market rent for those with household incomes of between £60,000 and £90,000. Existing council rents (not so-called "target rents"), should be charged. There should be no means testing at any stage.
- While boroughs may set eligibility criteria for intermediate units to reflect housing need, these should automatically cascade out to the London-wide eligibility criteria within three months to ensure that units are not left vacant.

Recommendation: To drop the £60-£90k band and cap rents at London Living Rent level.

Recommendation: To review the homeowner clause wording about affording another private rented sector property.

Recommendation: To ensure protections around subletting are strongly built in.

Priority system

Question 8: Do you agree the following groups should receive additional priority? (please tick all that you agree with, or select 'no group should receive additional priority')

Option	Total	Percent
Key workers	64	71%
Armed Forces personnel	35	39%
Victims of domestic violence/abuse/harassment	54	60%
Carers	48	53%
People fostering or adopting who need more rooms	44	49%
No group should receive additional priority	16	18%
Not Answered	0	0%

- Q1b. One comment was that current key workers living in the borough should be excluded with this being used as a recruitment tool.
- Q10 – One person felt key workers should have the highest priority, another stated only key workers should be prioritised.
- Q9 – One person question why a nurse should be prioritised over a worker in Tesco when both are needed.
- One email respondent said that giving priority to carers and victims of domestic abuse seems to be blurring things with the current housing register and homeless legislation. There is a high burden of proof required and we have concerns about the sharing of sensitive personal information with developers.

Recommendation: To retain these priority categories.

Question 9: Should any other groups receive priority, and why?

There were 47 responses to this question and some responses have been added from question Q1b. References to specific job types have been moved to the key worker section. The remaining comments are as follows:

- All people should be treated equally X2
- All people on low incomes who cant afford the private rented sector
- Anybody giving up social housing
- Disability - Families/households with household members with disability X5
- Families - Overcrowded families X3, Families with Children X3, Single Parents X2
- Long term residents and or those with a local connection, working in the area etc X4
- Those with time on the Southwark social housing waiting list
- Mother and daughter allocations
- Older people in the private rented sector
- People who face discrimination regardless of their ethnicity, religion , race or sexual orientation and backgrounds.
- People with university studies (parents) X2
- Qualified professionals.
- Under 30s and young Southwark residents X2
- Volunteers X2

- Young people leaving care.
- Young people who have experienced homelessness.

Question 10: Should the following be included in the Southwark keyworker definition? (please tick all that you agree with)

Option	Total	Percent
Nurses and other clinical staff employed by NHS	73	81%
Social workers, educational psychologists and therapists	56	62%
Firefighters	66	73%
Police officers/Police Community Support officers (PCSO)	61	68%
Teachers/teaching assistants (from non-fee charging schools)	66	73%
No keyworker should receive additional priority	15	17%
Other	19	21%
Not Answered	1	1%

There were 28 added responses. The comments in relation to this from the previous question have also been added here. In some of these cases the same answer was written in both questions.

- Key worker additions
 - Health care workers
 - Care assistants
 - Nursing assistants X2
 - All hospital staff
 - All NHS employees
 - Doctors (below consultant grade)
 - Care Workers/Assistants X2
 - Family Support workers
 - Childcare workers/Practitioners X2
 - Pre-school and nursery staff
 - Teachers from fee- charging schools. A teacher is a teacher is a teacher. Fee charging schools offer scholarships etc.
 - Those employed in an education related setting e.g. school improvement, advisors - Visiting / outreach teachers employed by the council X2
 - University lecturers x2
 - British transport Police
 - All public sector workers
 - NGO employees
 - Council workers X3 AND Council day centre staff, admin staff etc X1
 - People doing key workers roles in community and voluntary sector and even private organisations which provide care and support
 - Volunteers and Charity Sector employees
 - All critical workers
 - Artists working and contributing to the community fabric, cohesion and education
 - Post women and men with young families
 - Retail workers in Southwark
 - Qualified professionals who cant afford PRS x2

One respondent stated they thought the definition of “keyworkers” could potentially be expanded significantly, so “priority” should be kept to a minimum or dropped completely... Many other people doing low paid socially engaged and important work who may work freelance, self employed etc. would be excluded by these definitions etc.

There was a question about what happens if somebody stops being a keyworker. Another felt the key worker priority should require a permanent contract.

The following comment were also received via email or at meetings

- Ensuring homes are affordable to people working in key public services is important to guarantee that these services remain available in the future. Keyworker incomes are generally in the range of £18,000 to £45,000, so many are unable to afford local private rents but not eligible for affordable options. Local schools and health centres need to be able to recruit staff and housing is a key factor that affects people’s decision on where to work. For example, Guy’s Hospital serves local people and employs c. 16,000 workers, many of whom are keyworkers. There are also seven schools within 500m of the Canada Water site. Census data indicates that there are approximately 20,000 keyworkers in Southwark, making up c.11% of the working population, meaning there is a significant need for keyworker homes.
- There are 4.5 million households in the private rented sector and 3.9 million in social housing, of which many work in the essential services sectors on incomes lower than the minimum £26,000 eligibility threshold outlined in the consultation. We urge the Council to take full account of this and provide discounted rents and investigate extending the definition of key workers within the consultation as staff providing essential services such as builders’ merchants.
- How will you ensure that the definition of ‘key worker’ does not lead to legal challenges including around equality aspects of the application of this policy. Similarly how will the council ensure that the developers are bound by PSED considerations?
- The education system should provide housing for teachers & NHS should provide housing for doctors/nurses.

Recommendation: To keep these proposed key worker categories but adjust the wording to include doctors and transport police. The final definition will require further research.

Question 11: As many hospitals, fire stations, schools etc in neighbouring boroughs provide services to Southwark residents, should the definition of key workers be limited to key workers working in:

Option	Total	Percent
Southwark borough only	30	33%
Southwark and neighbouring boroughs where services are provided to Southwark residents	31	34%
Any key worker working in London	19	21%
No keyworker should receive additional priority	8	9%
Not Answered	2	2%

- Housing is an important factor that keyworkers consider when looking for job opportunities. Consideration should therefore be given to people that currently live

outside of Southwark but wish to locate to a new role in Southwark. The ability to secure an intermediate home and move into a keyworker role in the area may attract more talent than if people have to find temporary accommodation. This could be an important benefit to those such as hospitals who currently struggle to attract sufficient staff.

Recommendation: There was no clear outcome from the consultation; you could argue that 55.4% were in favour of this being extended to key workers from beyond the Southwark boundary. Extending this to neighbouring boroughs would be the middle position, but it would add complexity to the scheme. This will need further work including considering the key worker recruitment evidence base, therefore the final definition will be finalised in a later report.

Question 12a: The same priority system will apply for the properties let up to a maximum of 80% market rent for those on household incomes of between £60K and £90K. The Council could introduce additional priorities for these properties.

Should there be priority for families with children?

Option	Total	Percent
Yes	56	62%
No	26	29%
Don't know	7	8%
Not Answered	1	1%

Question 12b. Should there be priority for households with two or more joint incomes?

Option	Total	Percent
Yes	23	26%
No	53	59%
Don't know	13	14%
Not Answered	1	1%

Should any other additional priorities be introduced for these properties?

There were many responses to the question but most referred back to categories that were already in the proposed priority categories, or had been covered by existing suggestions for additional priority categories, such as key workers, disabilities, carers of parents etc.

There were a number of comments in opposition to the income band (£60k-£90k) being included.

Recommendation: The Council has now dropped this £60k to £90k band so these questions are no longer relevant.

Question 13: Do you have any further comments on the proposed priority system?

Responses to this question included:

- There should be a separate scheme for key workers
- Only keyworkers should be eligible given demand and supply (except domestic violence cases)
- Only those in low paid public service should be eligible
- Only those in front line key worker positions should be included.
- Keyworkers should be prioritised who may be called in 24/7 who need to live closer
- Priority should take account of both time on the list but also time lived in the borough
- Neighbouring boroughs should operate the same scheme
- How will applicants be aware and informed of the lottery system, how transparent will this be?
- We support the proposals for the intermediate housing waiting list and see this as helpful for identifying peoples' needs and fairly prioritising homes.
- Allocating affordable housing is a practical matter that entails criteria. These should be orientated to those in greatest need, including time spent waiting for affordable housing. We therefore do not agree with the priority star system. The right to housing is a fundamental one. The shortage of affordable housing, broadly defined, should be addressed by increasing the supply of affordable housing, rather than segmenting and prioritising different groups, no matter how worthy they may be. Southwark's priority should be to increase the supply of social rented housing, such that there is enough to meet the needs of those identified as 'key workers', as well as those on the lowest incomes.

What should happen at the end of the fixed term tenancy?

Question 14: At the end of the three year tenancy, where the household income has increased above the maximum income thresholds, should the landlord (please select one option):

Option	Total	Percent
End the tenancy and expect the tenant to find alternative accommodation	12	13%
End the tenancy but offer an alternative higher rent property	19	21%
Increase the rent of the current property but lower the rent on an alternative property in the same block when it becomes vacant	23	26%
Extend/renew the tenancy on the same terms	25	27.8%
Other (please explain below)	9	10%
Not Answered	2	2%

There were 23 additional comments including

- Extended as long as they are still key workers
- Enough time needs to be provided to find another home or before a rent increase
- It should be a 5 year minimum tenancy
- Care needs to be taken to ensure it does not act as a disincentive to increase income/promotion.

- Gentle rent rises linked to income rises, with the option for future reductions again if income falls. Another respondent raised this issue of income reductions.
- Increasing the rent sounds fair but only if another unit is freed up for those waiting X2
- Most people will be looking to buy anyway so there is no need for additional uncertainty. AND. Support should be given to help people buy
- People should not be evicted for doing well at work
- People need long term security AND Tenancy should be secured, especially for those with children. This was reflected in multiple comments.
- Increase the rent if income increase for over a year/2 to 3 years X2
- One person felt the tenant should be offered both, the option of having an increased rent or renting an alternative higher rent property.

There were also many comments sent in by email or made at meetings on this topic as follows:

- The minimum private tenancy should be 5 years. Three years appears good only in comparison to bad practice in the private sector.
- We oppose the minimum three year assured shorthold tenancies. This is not security of tenure. The council should only issue guaranteed lifetime tenancies.
- The complexity BtR introduces into the already complex world of affordable housing also militates against fair outcomes. Rent levels, tenures and tenancy conditions on approved schemes will be hard to monitor. A 3-year tenancy with the prospect of a rent rise or forced move at the end of it, is not conducive to stability, for either the individual or the local community. It is also noteworthy that significant increases in a BtR tenant's income will be passed to the landlord, rather than improve the tenant's standard of living.
- Security of tenure is an important part of ensuring sustainable communities; tenants should wherever possible be able to stay in their homes as long as they wish. On this basis, the simplest approach would be that tenancy renewal be based on whether the resident has paid their rent and continued to meet the initial eligibility standards in respect of intermediate housing (i.e. not being subject to court orders for breach of tenancy conditions; convictions for illegal or immoral use of their home; nuisance and annoyance to neighbours and visitors; criminal offences in or near the home and still posing a threat to neighbours and the community; violence towards family members and domestic abuse; deception/providing false information; acts of violence or aggression against Southwark or partner organisation staff; unlawful subletting; racial harassment or hate crimes)
- We have concerns about loss of security for tenants. Following the Housing Act 2016 Southwark Council committed to maintaining 'homes for life'. This proposed policy seems to contradict this commitment. The proposed policy sets out that there would be a reassessment of means for tenants after 3 years. We had understood that Southwark had a policy commitment not to carry out means assessments. People's situation might have worsened at the end of 3 years e.g. ill health, relationship breakdown loss of job. It is hard to see how legally developers can be held to extend the tenancies so Southwark Council may find families and individuals in priority need presenting as homeless.
- How will the council ensure that developers will extend tenancies beyond the initial three year period?

- With LLR, when funded by the GLA, the rent should not be increased above the rate of CPI inflation over a period of 10 years, given that the intention of the product is to help buyers save for a deposit. Mirroring this by offering rents at LLR levels for a ten year period, irrespective of income increases, may be more feasible than asking tenants to periodically submit details of their household income.

Recommendation: There was no clear preference for any option in the consultation. There was broadly opposition to requiring a household to leave due to having an increased income. But also concern about why somebody on a higher income would continue to receive a lower rent while others are still struggling. Focusing on suggesting alternative options for those with higher incomes to save more and move out may be the best option.

Should there be a savings requirement?

Question 15: As these lower rent homes could be a stepping stone to buying a property, such as through shared ownership, should there be any kind of requirement to provide evidence of having built up savings to put towards a deposit?

Option	Total	Percent
Yes	26	29%
No	50	56%
Don't know	12	13%
Not Answered	2	2%

Recommendation: To not require savings but ensure regular advice on this is provided.

Question 16: Do you have any further comments or suggestions about the proposals for tenancy renewals?

Most comments in this section were repeats of comments included above for Q14. Additional comments included:

- There should be no requirement to buy – renting should be a tenure in its own right X2
- Provide guidelines on saving for a deposit
- Tenants need long term security, even if circumstances stay the same
- Don't create a system where people have to keep moving (musical chairs of flats)
- People should not be turfed out for having a higher income but likewise nobody wants to see the council giving cheap rents to those who can clearly afford higher rents in the same area.
- We should aim for secure tenancies and controlled rents (as in other countries)
- The tenancy length needs to be linked to the time it would take to build up the required deposit to buy (longer term).
- Need to be fair to landlord, landlord should be able to raise the rent lowering the rent of an alternative property.

Equalities impacts

Question 17: Do you think these proposals would have any particular impact on certain people in relation to any of the following protected characteristics: Age /

disability / gender reassignment / pregnancy and maternity / race / religion or belief / sex / sexual orientation / marriage or civil partnership?

Option	Total	Percent
Yes	14	16%
No	41	46%
Don't know	31	34%
Not Answered	4	4%

Of the people who said yes, the following comments were made

- Four people said yes but gave no explanation
- Young people and young couples
- Prioritising multi-income households could disadvantage single parents
- It would discriminate against those who were not classed as key workers but who work in schools, “cleaners, cooks and office staff”. The people in these roles are usually older, part-timers, single parents and/or those lacking in academic/professional qualifications. The danger in the intermediate list is that it will only benefit those classed a key workers, regardless of other protected characteristics.
- Pay grades
- Race - the cost/value of properties could isolates members of the BME community who can not afford to save due to the experiences of not being in or being promoted to a job which would give them a decent amount of disposable income.
- Race/ marriage or civil partnership/Age
- Relationship breakdown
- Overcrowded
- The proposal would help younger people from eligible categories to find accommodation close to where they work.
- Women may be adversely impacted due to gaps in employment sue to caring responsibilities of children and maternity leave/pay reductions in affordability to rent.
- Additionally disabled people whose incomes may fluctuate due to ill-health and earning capacity may mean that whereas these rents were affordable, may become unaffordable if they were to experience a period of unemployment/leave from employment. They would need to be supported to remain in their tenancy/guaranteed priority on the housing register if their financial circumstances change.

Of the people who said don't know the following comments were made:

- Implemented correctly, the scheme should help groups who may currently be a subject of discrimination.
- It could be an issue if producing of these homes stops other council homes from being built or if the growth of the population in Southwark became overpopulised
- It seems that it would not have any impact although I am not sure I understood perfectly the question. I think what is important is that this scheme will guarantee houses to people based on salary and number of people depending on that salary. In particular situations, as for example some health conditions, disabilities, social problems, then the council should have other scheme to intervene, separated from

this. If somebody is at the end of life and in need of a basement house (street level, not below the street level), to make movement easier, easier the access to operators from A&E for example, than the council should have those schemes, in place.

- It should not be an issue, but that would depend upon the biases (unconscious or otherwise) of the allocator.
- Not sure what you mean. It should be key workers whatever.

Other comments

Some comments received via email did not really fit under the consultation questions. These are as follows:

- Tenants should be allowed recourse to the Housing Ombudsman Service, with the necessary arrangements made with the HOS. The Plan should require all BtR members to be a member of the Housing Ombudsman Service.
- It is vital that new developments link to existing communities. Enabling local people to access new homes is one element of creating links.... Appropriate use of Local Lettings arrangements are therefore supported.
- Local Lettings - Paragraph 55 of the consultation note sets out Southwark's plan to extend the use of local lettings plans to intermediate rent. We support this proposal for larger sites, where providing homes for local people is important to ensure a sustainable community. A range of 500 to 1,000 metres from the site boundary may be appropriate as the definition of the local lettings area.
- The eligibility criteria generally appear reasonable. With regard to Definition of Household we would note that, whilst it is positive to acknowledge the option for sharers, the text appears to indicate that one member of the household would be responsible for the rent / tenancy. This potentially creates a problem common to "buy to let" housing whereby one tenant is responsible for a large rent which they cannot afford to pay if others move out.
- These properties are not council homes and should not be presented as such. There will be no new council homes made available. Instead resources will be diverted into homes which are unaffordable.
- There is a question about whether private landlords would be effective in managing a variety of different tenancy types and whether they would be able to provide the kind of housing management needed by social housing tenants.