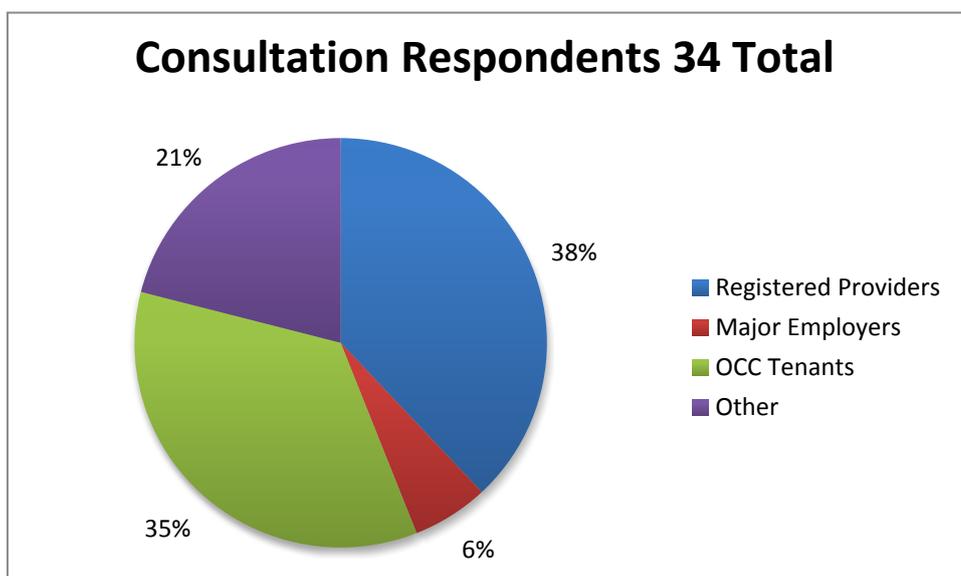


Appendix 4.

Draft Tenancy Strategy and Tenancy Policy 2018-2023

Consultation Feedback

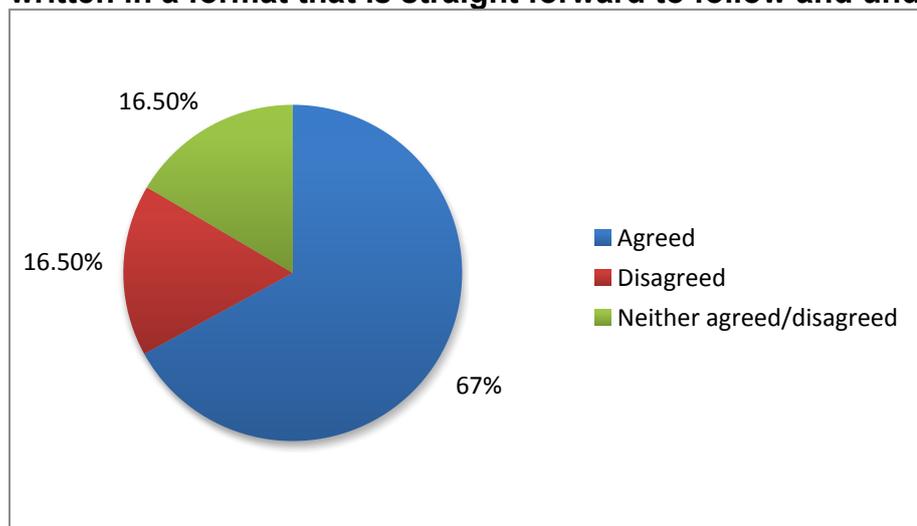
1. At its meeting on 20 March 2018, the City Executive Board (CEB) approved the publication of the draft Tenancy Strategy and Tenancy Policy 2018-23 (and associated appendices) for a 4 week period of public consultation.
2. The consultation ran from 21 March 2018 to 19 April 2018 and included a consultation event with stakeholders and statutory consultees, a consultation event with Council tenants, and a public survey via an online questionnaire www.oxford.gov.uk/tenancystrategysurvey. The consultation was promoted via social media, posters, news articles, Member briefings and articles in the City Councils' Tenants in Touch magazine. To meet legislative requirements, copies of the draft Tenancy Strategy and Tenancy Policy 2018-23 documents were sent electronically to all Registered Providers who operate within Oxford City. In addition, paper copies of all the documents were made available for the public to view at St Aldates Chambers.
3. There were a total of 34 responses received during the consultation period. Although this figure is low, the majority of responses received have come from those who are highlighted in the legislation as having a particular interest in the strategy. These include responses from 13 Registered Providers, 2 major employers and 19 individuals. 35% (12) responses were received via the online survey form; one individual response was provided via written feedback as opposed to completing the online survey; and the remainder of responses were obtained from the stakeholder (12 attendees) or tenant consultation (9 attendees) events held in early April 2018. A summary of the consultation feedback, along with the officer response, has been provided in this document.



Tenancy Strategy 2018-2023 Combined Consultation responses summary

The majority (67%) of respondents agreed that the strategy had been written in a format that was easy to follow and understand.

Q. To what extent do you agree or disagree that the strategy has been written in a format that is straight forward to follow and understand?

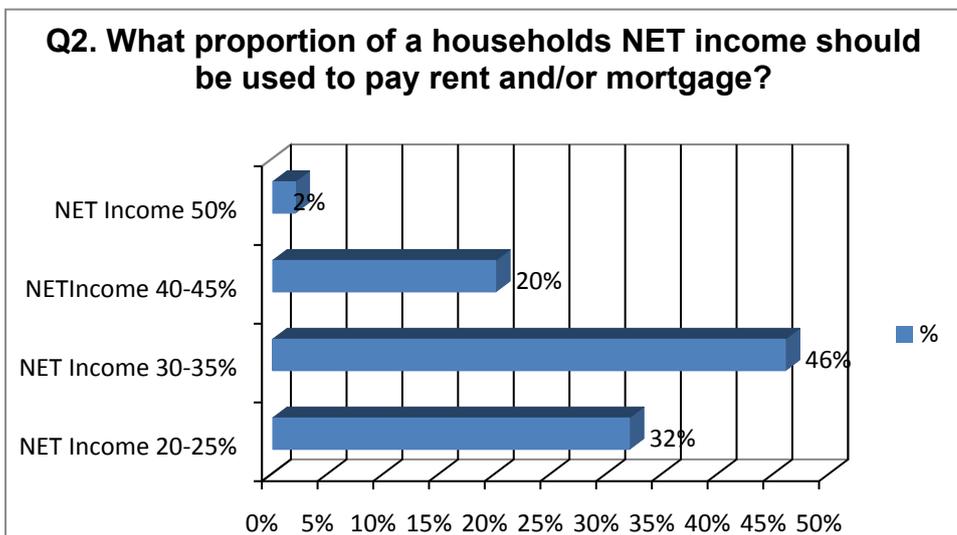
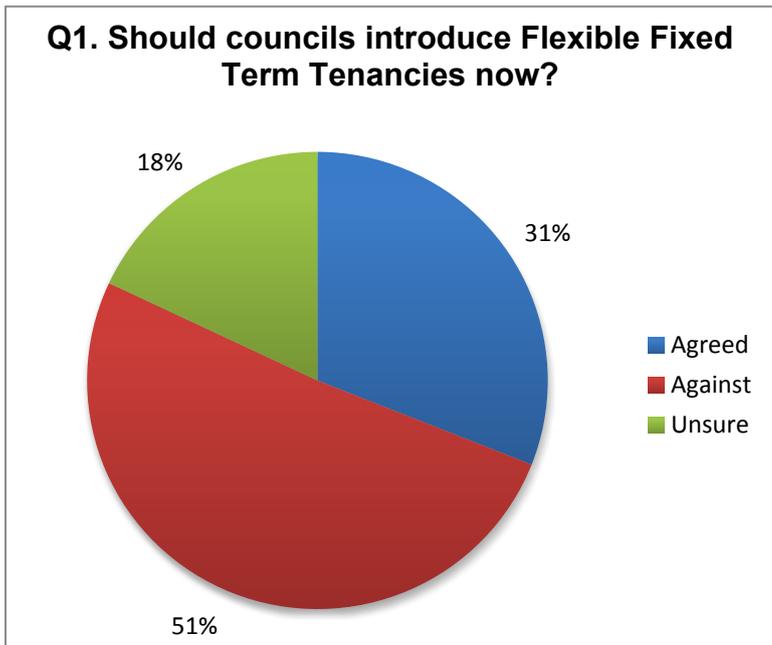


From the collective feedback received:

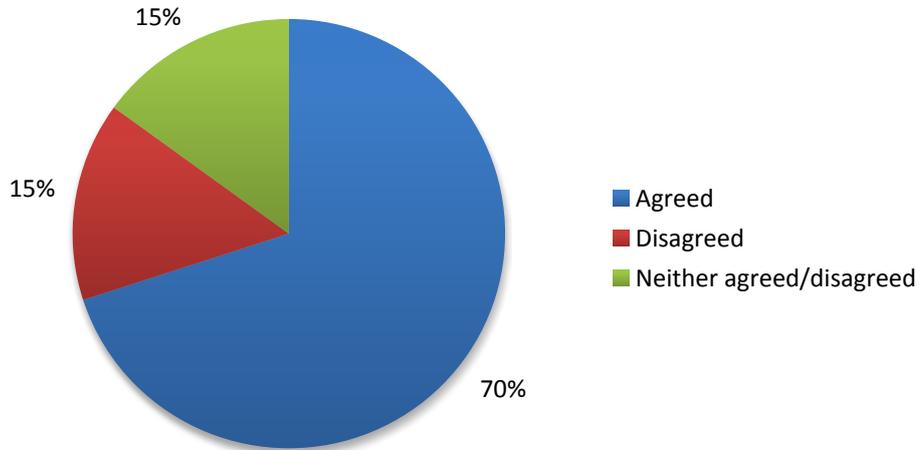
- Just 31% of respondents supported that the Council should introduce Flexible Fixed Term Tenancies now.
- In relation to the assessment of affordability as set out in the Strategy, 46% of respondents expressed a view that it would be reasonable to pay between 30-35% of NET household income on household costs i.e. rent and/or mortgage. A further 32% of respondents proposed that this should be lower (e.g. 20-25% of NET income).
- 70% of respondents agreed that the Council and Registered Providers (RPs) should provide tenancies at social rent levels and 61% supported that the Council should continue to offer lifetime tenancies.
- Around half (52%) supported that social housing providers (RPs) should offer lifetime tenancies and a further 25% neither agreed nor disagreed with this. Those who disagreed highlighted that fixed term tenancies can assist in better managing housing stock and can facilitate the churn of social housing re-lets.
- 91% of respondents agreed that affordable rents, if used, should be capped at Local Housing Allowance levels although concerns were raised regarding the viability of schemes if rental income is capped.
- Strong support (94%) was also demonstrated for any receipts from sales of Affordable Housing to be used to build "one for one" replacement homes at social rent levels. However, respondents also highlighted that there is limited development opportunity within the city to build the replacement homes i.e. not many larger development sites and smaller development sites may be impacted by viability.

- 70% agreed that rent charges on shared ownership properties should be capped (to support affordability). However, concerns were expressed that capping rental income may impact on the viability of schemes.

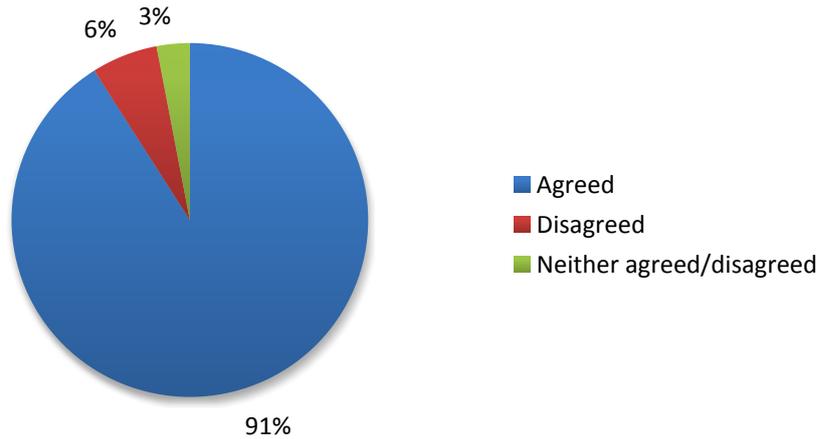
A more detailed analysis of the questions asked, are listed below:



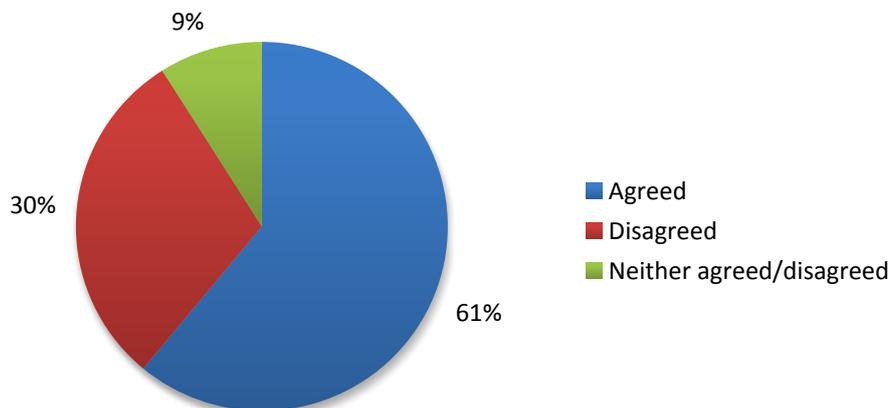
Q3. The focus for the Council & RPs should be on providing tenancies at social rent levels?



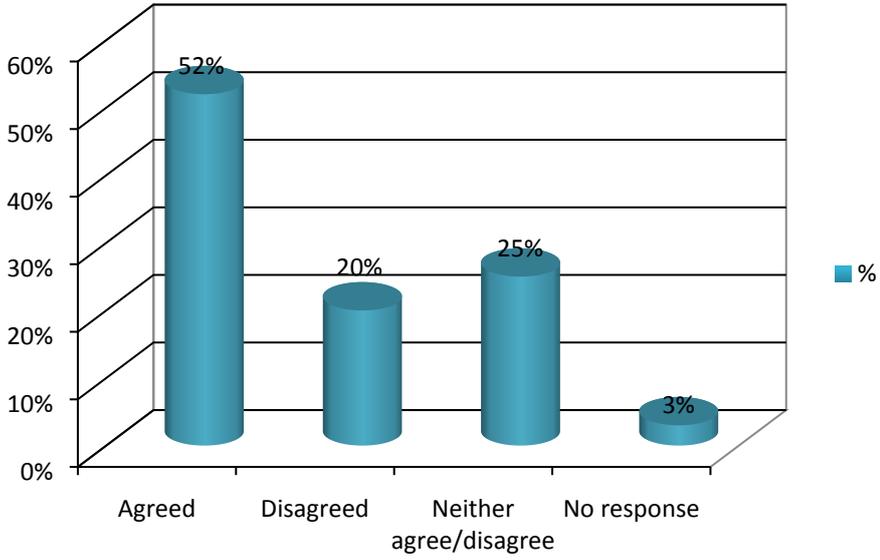
Q4. Affordable Rents, if used should be capped at LHA levels ?



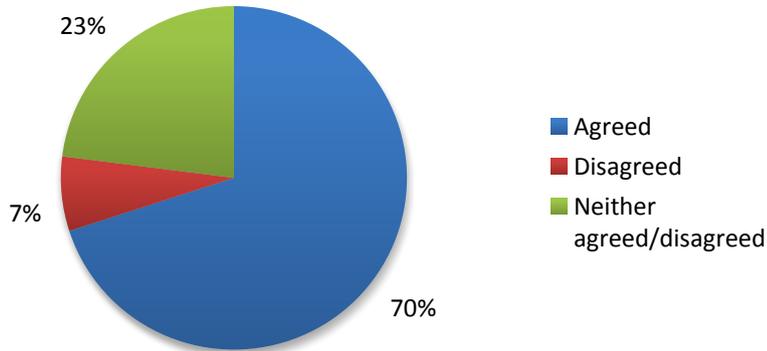
Q5. The Council should continue to offer "lifetime tenancies" ?



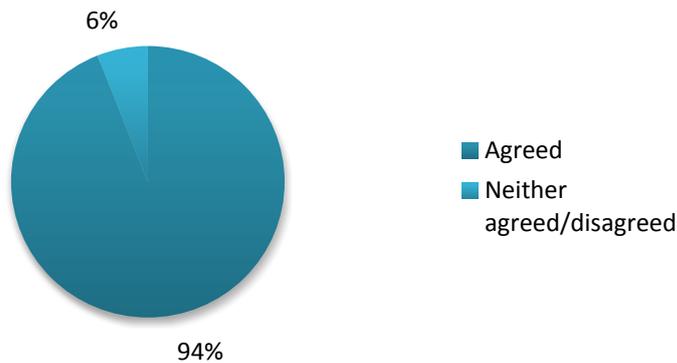
Q6. Social Housing Providers should offer lifetime tenancies?



Q7. Rent charged on Shared Ownership properties should be capped at 2%?



Q8. Receipts from sales of Affordable Housing should be used to build "one for one" replacements at social rent ?



Additional Consultation Responses and Officer Response

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REF	Comments received re: implementation of Flexible Fixed Term Tenancies (FFFT)	Officer Response (OR)
1	Too much churn disrupts communities.	<p>OR1. Overall the consultation feedback highlighted a majority view that Oxford City Council should not introduce flexible fixed term tenancies (FFFT) until Government guidance has been published in relation to the mandatory use of FFFT's. The opportunity to create additional churn within Council housing stock, as FFTTs come to an end, is limited mainly because there are few alternative affordable and available move-on housing options in Oxford's private rented/sale market.</p> <p>In terms of under-occupation, the City Council already operates an incentive scheme for Council Tenants wishing to downsize from family-sized homes. Implementation of FFTTs will not impact upon existing secure tenants unless certain circumstances are met.</p> <p>Given the above, it is proposed that the City Council continues to issue introductory and lifetime tenancies for the time being. When Government guidance has been published and the regulations are in place, the City Council will revise the Tenancy Strategy and Tenancy Policy 2018-2023 and align it with legislative requirements. A further consultation period will be undertaken in advance of any revised strategy being approved by Council.</p> <p>Income – this would usually be the income of the tenant i.e. joint tenants, collective income of tenant and spouse/partner etc.</p> <p>Amendments made to page 9 of the strategy to make clear that affordability assessments would include consideration of income and capital.</p>
2	Way of dealing with severe under-occupation.	
3	FFTTs can be useful for managing high demand stock.	
4	Will affect back-office administration.	
5	Take into consideration the type of tenant.	
6	Going to happen anyway so should start looking at now.	
7	Balance between sustaining communities and making best use of stock.	
8	To help churn of larger properties for families in need.	
9	It may be sensible to help people to down size but with controls on area etc.	
10	Not all clients will be in need of a tenancy for life. If fixed term tenancies are offered then clients can be reassessed and moved on where appropriate. This will increase supply for those in need. Alternatively, those no longer in need could keep their tenancy but be asked to pay higher rents to reflect their ability to do so. This would be fairer to clients in the private sector and extra income could then be re-invested into housing services.	
11	Will have impact on staff - increase workload	
12	Need infrastructure in place to move people around	
13	People have a community around them they'll want to keep.	
14	Will affect single and elderly.	
15	Income of non-dependents taken into account?	
16	Need to interlink all parts - land to build on, rent levels, educating tenants to sustain tenants etc.	
17	Flexible tenancies are not one size fits all - e.g. 'hard to lets' advertised with a FTT would be likely to make the property harder to let. Need versus want needs to be taken into account.	
18	FFTTs should be introduced without waiting for guidance to be written	
19	How far will a person need to move if their FTT ends & they need to move?	

20	Social landlords have become more of a social services, but resources missing. Need to look at the whole picture.	
21	FTTs might be an incentive for people to take responsibility for their tenancy	
22	FTTs can restrict the options available for a tenant seeking to do a mutual exchange and restrict mobility of social tenants. End of a FTT - income & capital could be taken into account when determining if it should be ended.	
	Comments RE using NET or GROSS income	
23	If using net possibly use a higher percentage	OR2. Review of the consultation responses identified that 46% of those responding agreed that 30-35% of NET income should be used to pay rent and/or mortgage and 32% of those responding suggested that 20-25% should be used. Only 20% of those responding suggested that 40% or higher of NET income should be used as guidance within the tenancy strategy. In light of this feedback and taking into consideration other national publications on the issue, it is proposed that 35% of net income be used within the Tenancy Strategy 2018-2023 as an indicator of local affordability. Many households calculate finances based on net income and expenditure.
	Comments RE What proportion of a household's NET income should be spent on a rent and/or mortgage?	
24	Depends on peoples incomes.	See OR2. The net income used is the basic net after Tax and National Insurance deductions. However many households will also be contributing towards work place pensions or other family support costs etc.
	Comments RE The focus for the Council & RPs should be on providing tenancies at social rent levels	
25	On the business side – building without grant is not sustainable, can't build to social rent level, affects supply. Cap to LHA is fair and makes schemes viable.	OR3.Tenancy Strategy amended at Affordable Rent section - to reflect that affordable rent should align to and not exceed the LHA rates where viable. Viability of schemes is also considered on page 11 of the tenancy strategy. Social

26	Small schemes don't work at LHA level.	rent is the most affordable for of tenure – see Appendix C for details.
27	Difficult finding applicants in housing need who meet the criteria and can afford affordable rent.	
28	Look at supply and demand – will there be funding to RPs to support social rent?	
29	Consider what other authorities are doing with regards to supply of Social Rent against Affordable Rent.	
	Comments RE The Council should continue to offer "lifetime tenancies"	
30	Some social housing providers offer average life tenancies – may be an option to determine length of FFT. Could also review turnover by property type	See note OR1.
	Comments RE Social housing providers in Oxford should offer "lifetime tenancies"	
31	Offer mix.	OR4. The Tenancy Strategy clearly states a preference for social housing providers to offer social rents and lifetime tenancies however it also recognises the need to provide affordable housing to meet a range of needs and to develop successful and sustainable communities. Social Housing providers are required to have regard to the Council's Tenancy Strategy which also sets out guidance on the collective social responsibility to the community of Oxford.
	Comments RE Rent charged on Shared Ownership properties should be capped at 2%	
32	Lease terms affect payments	OR5. This should be taken into account when considering the impact on viability of any development programme. The strategy already relates to this issue.
	Comments RE Receipts from sales of Affordable Housing should be used to build "one for one" replacements at social rent	

33	Practicalities – nowhere to build.	OR6. Securing sites and opportunities to increase the number of affordable homes built in the City, is picked up in the Housing & Homelessness Strategy 2018-2021 Action Plan and will be considered as part of the development of the Council's Local Plan 2036.
34	Doesn't always work cost wise.	OR7. Viability assessments will continue to determine impact on deliverability etc.
35	Support diversity of dwellings.	OR8. The balance of tenure and mix of dwellings are currently considered as part of any planning application made in and around the City.
36	Cross fund – using receipts of high end properties to fund/subsidise the 1 for 1 social rent.	OR9. The Tenancy Strategy sets out a requirement for social housing providers to use receipts from sales of affordable housing to provide a one for one replacement property where it is possible to do so.
	Comments RE In your opinion what should the role and purpose of Social Housing be?	

37	<ul style="list-style-type: none"> • Those who need it and can't afford it • The quality of accommodation must be of good standard • Initially it should be used for emergency cases with a potential view to lifetime use and affordability • To solve the problem of homelessness <p>To provide accommodation that is affordable to people on low incomes. To provide affordable housing for residents who cannot get onto the property ladder until their finances allow them to apply/get a mortgage. Should be used as a stepping stone to help people who are in genuine need until their personal circumstances have improved To house all of those in genuine need of housing in good conditions for their whole lifetime. To help those people who are unable to access other affordable housing options in an area where they live or work. To offer safe, affordable, easy to heat, lifetime homes for people excluded from purchasing a home with a mortgage. To provide sufficient, quality, affordable, long-term rented housing to meet the needs of all those seeking social housing within the local area so that all have a roof over their heads and can live in decent, well-maintained properties. To house people on lower income who cannot afford to buy a house especially in Oxford where houses are so high in price</p>	<p>OR10. Comments noted. The Council's overarching Housing and Homelessness Strategy 2018-2021 (and Action Plan) sets out how the Council will work in partnership to ensure that social and affordable housing in the City is made best use of and is allocated appropriately to reduce homelessness and meet housing need. The Tenancy Strategy 2018-23 also sets out expectations of social housing providers to apply social responsibility, support tenants and make best use of their housing stock.</p>
	Comments RE Affordable Rents	
38	Restricting affordable rents to less than LHA rates may affect the financial viability of some new developments	See note OR7.
39	Affordable rents above LHA are not affordable for most	See note OR3.
40	It shouldn't be a given to get a home at reduced rent	OR11. Oxford City Council in line with the ORAH agreement and Allocations Scheme assesses all applicants individually on their particular housing need at the time of applying to the council.

		OR12. Affordability tables and statistics shown in Appendix C have been updated to include latest releases. The text in Appendix C has also been amended for clarity and also to strengthen the points being made about affordability. Also see comparable data shown in Appendix C FIG C.5, FIG C.6, FIG C.7, FIG C.8 and FIG C.9.
41	It does not state what is classed as affordable, or how this is calculated	
42	<p>We generally agree with the strategy and the thinking behind it to ensure affordable housing remains truly affordable.</p> <p>However we think there should be 2 more exceptions made in your policy as set out below:</p> <p>Supported Housing- in the case of Long Term supported housing such as for Learning Disability and Mental Health clients where accommodation is eligible to be determined as 'exempt accommodation' we think rents higher than LHA should be able to be charged which will attract greater private investment into Oxford which may solve some of these housing issues more quickly. These types of small supporting housing developments allow more options than living in an alternative such as residential care and the issues of affordability and ability to find work are less conflicting.</p> <p>The same exemption should be used for private leasing schemes used for supported housing, albeit where they may be leased to Registered Landlords.</p> <p>2- Key Workers- We think this area may need to be an exempt category of your strategy as it may prevent possible land opportunities coming forward if rents are restricted to LHA due to viability concerns.</p>	OR13. Comments have been noted. The tenancy strategy has explored the issue of affordability of accommodation for the local community, and justification (including viability of a scheme and the cost of service charges etc.) to support exemptions from capping rents at LHA levels, would need to be provided and considered on a case by case basis. Generally, all new developments should comply with Planning Policies.
	General Comments	
43	Terrible under-supply - housing market is broken	See notes OR6, OR7 & OR8
44	There is nowhere near enough Council Housing	See notes OR6, OR7 & OR8
45	Don't want to push people out of the area like in London so social rent needed, but need to educate people it's not a right to have	See note OR11
46	Why are universities getting planning permission for all their sites?	OR14. Planning applications for student accommodation are being determined under existing planning policies. Any applications to develop staff accommodation would also be considered under the existing planning policies. Any

		proposals for change in the future will be considered as part of the Council's Local Plan review.
47	There doesn't seem to be much in it about leaseholders.	OR15. Mention has been made within the strategy in relation to minimising the cost of service charges - this would be of particular interest to leaseholders.
48	<p>(Summarised response below)</p> <p>A proportion of Registered Provider housing in Oxford should be at social rents. Support for the strategy in general and for the benefit of the local community Starter and lifetime tenancies supported as it is believed that sustainability comes when tenants have a stake in their community. Support for the creation of balanced communities through appealing to tenants of mixed incomes and through promoting tenancy support / welfare advice services and helping people back to work. The focus needs to be on provision of more quality housing at affordable rents so that people who choose to live and work in Oxford can do so safely, securely, affordably, confidently and comfortably and not have to worry about endless moves in private sector. Support for some smaller homes to be built and made available to rent/buy, like to Container 'starter' homes or eco-friendly versions to accommodate people more quickly.</p>	<p>OR16. The customer/stakeholder's support and commitment to assisting the needs of the community is acknowledged and appreciated. The key objectives of the Tenancy Strategy 2018-2023 are:</p> <ul style="list-style-type: none"> • To promote Oxford City's housing vision with a focus to provide social rented tenancies • To ensure that affordable housing providers adhere to the new Tenancy Strategy to the benefit of the local community • Affordable housing providers are to let any new tenancies in Oxford at genuinely affordable rents i.e. in line with social rent or at Affordable Rents capped at Local Housing Allowance (or equivalent measure) levels. • To create sustainable, mixed and balanced communities. <p>The City Council, working in partnership with stakeholders is committed to delivering the Housing and Homelessness Strategy 2018-2021 and will continue to explore all viable types of accommodation to meet housing need.</p>

(Summarised response:)

The opportunity to comment on the draft strategy is welcomed.

There is a requirement to provide housing options across all income levels and for staff and for students. Oxford continually tops the least affordable city list (Lloyds Bank's Affordable Cities Review). As an employer in the city, there is an awareness of job applicants having turned down offers once they understand the Oxford housing market. Staff housing is needed but there is limited land that is not already developed. There is a need to provide staff housing to meet mixed needs of singles, couples and families.

There is support for the provision of a range of residential accommodation units which are attractive in cost and quality, along with adequate community infrastructure to support housing developments. There is support for the provision of truly affordable, quality and efficient accommodation in Oxford city.

It is also noted that travel distances and road congestion play their part in the development of housing communities and would support the provision of quality transport links alongside housing developments.

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OR17. Comments noted and support acknowledged. Also acknowledged are the concerns of employers around the difficulties experienced in attracting and retaining staff due to the cost of the local housing market. This Tenancy Strategy 2018-2023, as highlighted in OR10 and OR14, is committed to ensuring that the council and its partners work towards addressing the housing need for Oxford's diverse community, offering a choice of tenure to enable sustained communities.

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