CAMPBELL TICKELL

Supporting **Excellence**
Delivering **Social Purpose**

Slough Borough Council

Slough Borough Council

Statutory Consultation Report

Housing Allocations Scheme

Consultation period: 10 March to 11 May 2026

Certified B Corporation

Contents

Purpose of the report

1. To provide a report on the statutory consultation which took place as part of the delivery of the revised Housing Allocations Scheme. The report accompanies the final draft of the Housing Allocations Scheme and Equality Impact Assessment.

2. The documents will be presented to Cabinet for approval on the 15 June 2026.

Background

3. A gap analysis of the current Housing Allocations Scheme was undertaken in February 2026. It was used to inform discussions and the production of a revised scheme. Improvements to accessibility, fairness and transparency have been addressed together with compliance with the latest regulatory standards and legislation.

4. The production of a revised Housing Allocations Scheme requires Slough to undertake a statutory (formal) consultation process. This took place over 9 weeks between the 10 March 2026 and the 11 May 2026.

5. Early engagement took place with key sections of the Council to ensure a joined-up approach around vulnerable adults, occupational health, domestic abuse, carers and care leavers. Both the early engagement and the statutory consultation are captured in the consultation report.

6. Slough is also required to undertake an Equality Impact Assessment to introduce a revised Housing Allocation Scheme. This is captured in a separate document.

7. Slough commissioned Campbell Tickell Ltd to work with them to undertake the gap analysis, revise the scheme, conduct the early engagement and undertake the formal consultation.

Consultation Methodology

8.

Timeline	Description of Event	Status
December 2025	Produce a consultation plan	Complete
4 March 2026	Produce a summary of the proposed changes for CLT to give approval to consult.	Complete
March 2026	Produce the consultation material and create the online survey.	Complete
10 March to 11 May 2026	9 week consultation period	Complete
29 April 2026	Discuss interim results with the project steering group.	Complete
May 2026	Analyse full results	Complete

Timeline	Description of Event	Status
May 2026	Share final results and EQIA with the project steering group.	Complete
May 2026	CLT approval of the EQIA, consultation report and final Housing Allocation Scheme.	Complete
20.7.2026	Cabinet approval of the final policy (clearance 5.6.2026)	Complete

9. Early engagement took place with the following teams either through one off discussions, presentations or a series of working group meetings.
   - Housing Register Team
   - Homelessness Service
   - Neighbourhood Management
   - Adult Social Care
   - Children Services
   - Domestic Abuse Coordinator
   - Corporate Leadership Team
   - Lead Member for Housing
   - Members workshop (all party)
   - Legal Service

   The discussions informed the production of the draft scheme which was then presented to the CLT for approval to consult.

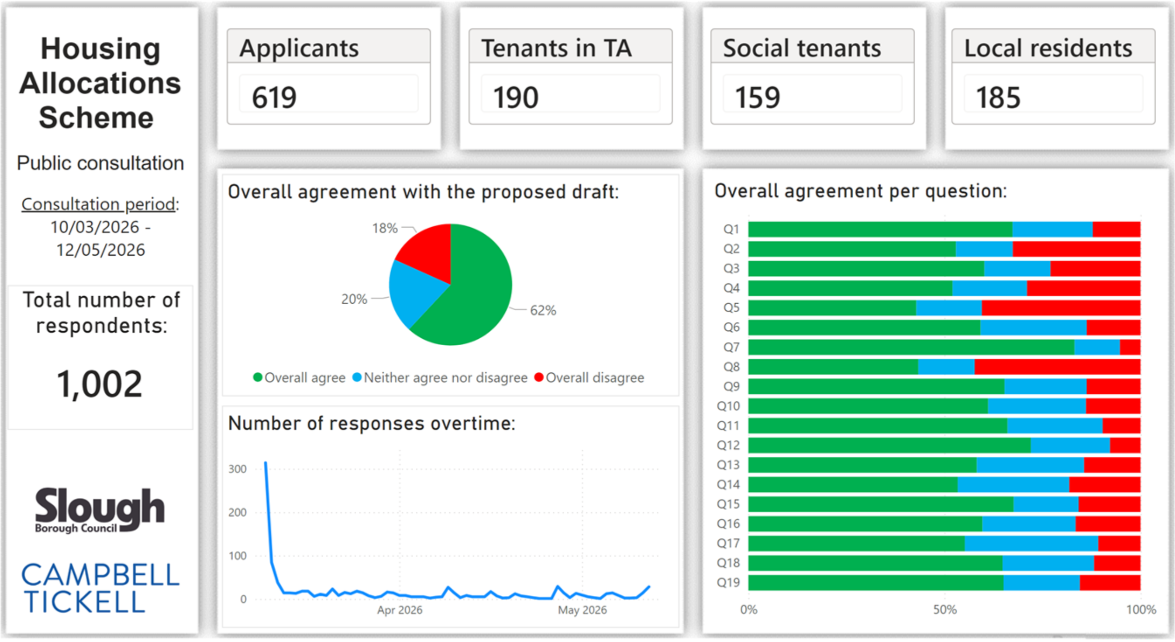
10. Statutory consultation took place as follows:

Stakeholder	Method
Applicants on the Housing Register.	An online survey was prepared and hosted by Campbell Tickell Ltd on Smart Survey. The consultation material including a draft of the revised scheme was hosted on the Council's website. A link was provided to the survey from the website. We contacted everyone on the Housing Register either by email or letter explaining the consultation and inviting them to provide us with their feedback on the proposed changes. They were offered assistance if they needed it. The results were pulled fortnightly and the final results were analysed at the end of the consultation.
Tenants in Temporary Accommodation	We contacted everyone in temporary accommodation by letter explaining the consultation and inviting them to provide us with their feedback via the online survey.

Residents of the borough	A communication plan was produced by Slough promoting the consultation through all social media channels and publications. They were all signposted to the online survey.
Resident forums	The proposed changes were discussed with the One Council Residents Forum and the Resident Board in a presentation and discussion.
Hard to Reach groups	A number of hard to reach groups including: care leavers, young carers and gypsies and travellers were consulted with.
Elected Members of the Council	The lead member for housing was briefed on the proposed changes and attended with officers an all party member workshop on the 23 March 2026. A briefing document was also circulated as part of the formal consultation. Members were emailed a link to the online survey.
Registered Providers	Registered providers were emailed a link to the online survey and invited to provide feedback.
External Agencies	Neighbouring authorities, and volunary/community agencies were emailed a link to the online survey.
Internal Stakeholders	The Council publicised the consultation for staff through the lets talk forum and provided a link to the survey.

Summary of the Online Survey

11. The dashboard below provides a summary of the results to the online survey.



We had a total of 1,002 respondents which included 619 applicants on the Housing Register, 190 homeless households in temporary accommodation, 159 Council tenants and 185 were other residents of the borough. There are 2,629 applicants on the housing register, and with a total of 1,002 respondants, this approximates to a 38% response rate. A response rate between 10% and 20% is deemed an indicative sample with which to consider the results. The response rate was excellent.

Communication Statistics

In addition to the online survey results, we also tracked the communication statistics to get a feel for the level of activity. This is summarised in the table below.

Communication Channel	Statistic	Volume
Reach	Number of times posts have been seen	53,100
Links	Number of clicks	694
Impressions		84,100
News Direct newsletter	Number of clicks	71
Press releases	Number issued	2

Results of the Online Survey

12. **Responses to the proposed changes via the online survey,** are summarised in the table below. A full breakdown has been made available to Slough together with a qualitative analysis of the comments.

Summation of Change	**Strongly Agree**	**Agree**	**Neither**	**Disagree**	**Strongly Disagree**
Options for housing in Slough clearly publicised. **Adopted**	28%	38%	21%	6%	7%
Applicants with an annual household income over £39,059 may not join the register. **Comparative Exercise**	27%	25%	14%	15%	19%
Anyone with savings, assets or investments worth £16,000 may not join the Housing Register. **Adopted**	30%	32%	15%	12%	11%
Anyone deemed adequately housed will not be able to join the Housing Register. **Adopted**	25%	28%	18%	15%	15%
Refusal of the single suitable offer will result in removal from the Housing Register. They will not be able to reapply for 12 months. **Adopted**	21%	24%	15%	20%	20%
Former members of the armed forces will be able to join the Housing Register regardless of how long ago they were discharged. **Adopted**	29%	33%	24%	5%	9%
Young carers will be allocated their own bedroom. **Adopted**	45%	38%	11%	4%	2%
Same sex sharing to be raised from 16 years to 18 years old. **Adopted**	20%	25%	13%	18%	24%
Overcrowded households will be able to bid for a smaller property	28%	41%	19%	7%	5%

provided there are sufficient bedspaces. **Adopted**					
Medical priority will now be either emergency or urgent. **Adopted**	26%	38%	24%	6%	6%
Band A now the emergency band. **Adopted.**	26%	43%	22%	4%	4%
Band B now the urgent band. **Adopted**	28%	45%	20%	4%	2%
Band C now the moderate priority band. **Adopted**	18%	43%	27%	8%	5%
Lettings target for applicants with a community contribution (paid or voluntary work, adoption, fostering, caring for someone) of 2% per annum. **Withdrawn**	18%	36%	28%	10%	8%
Adult children over 18 in overcrowded households will have the option to move into a 1 bedroom if it will alleviate or remove the overcrowding of the main household. **Adopted**	28%	38%	15%	11%	8%
Direct let protocol and the introduction of choice based lettings. **Adopted**	28%	33%	22%	10%	7%
Current homeless households lettings target of 65% to be raised to 70% per annum, with improvements around discharge into the private rented sector and prevention measures. **Adopted**	20%	37%	32%	7%	5%
Mandatory affordability checks when allocating a property to help the applicant to maximise their income. **Adopted**	29%	41%	20%	7%	4%

Application renewals. Band A every 3 months and Bands B and C every 12 months. **Adopted**	26%	39%	18%	9%	8%

13. The rule of thumb is generally if there is disagreement of 20% or more, then you do not proceed with the proposed change unless the Council feels there is a beneficial reason to proceed with the proposed change.

14. Where a respondent has neither agreed or disagreed, it is hard to know why, especially where a comment is not provided. They may feel it is not relevant to them, often they have not fully understood the question or they may genuinely have no opinion either way.

15. Where agreement was equal to or exceed 40% it is proposed that the change is adopted.

16. There are five proposed changes where there is disagreement over 20%. These are:
    - Q2: Household income threshold (down from £55,000 per annum to £39,059 in line with average annual income) **34%**
    - Q3: Savings, assets and investment threshold (down from £20,000 to £16,000 inline with welfare benefits) **23%**
    - Q4: Adequately housed (cannot join the register) **30%**
    - Q5: Refusal of a single suitable offer (removed from the register for 12 months) **40%**
    - Q8: Same sex bedroom sharing (up from 16 to 18 years old) **42%**

17. **Household income threshold - 34% disagreement.** The comments are summarised as follows:
    - **Agreement Comments**
        i. Support for prioritising social housing by income and need: Many respondents felt that aligning the income threshold with local average earnings would help ensure that limited social homes are allocated to people who genuinely cannot afford private renting or home ownership. Respondents often agreed that households earning towards or above the current £55,000 threshold are more likely to have access to alternative housing solutions and therefore should not compete for social housing.
        ii. Support from households experiencing acute housing need: Agreement was frequently expressed by people living in temporary accommodation, overcrowded homes, or with children who have

disabilities or additional needs. These respondents felt the change would improve access to stable, suitable housing for families whose wellbeing is affected by insecure living conditions.

iii. Income as a fair basis for prioritisation: Some respondents viewed income as a reasonable proxy for affordability and agreed that lowering the threshold would make the system fairer, reduce false expectations, and better reflect who is most likely to struggle in the private housing market.

iv. Positive view of regular review of the threshold: Respondents welcomed the commitment to review the income limit annually, noting this could help ensure the policy remains responsive to changes in local earnings and living costs.

- **Disagreement Comments**

  i. Threshold set too low given local housing costs: The most common concern was that £39,059 is not a high income in Slough once tax, rent and living costs are considered. Many respondents stated that households on or just above this level cannot afford private rents or mortgages locally, particularly as rents for family-sized homes regularly exceed £1,500–£2,000 per month.

  ii. Ignores household size and bedroom need: Respondents felt the proposal fails to distinguish between single applicants and larger households. A flat threshold was widely seen as unfair to families with children who require 3 to 4-bedroom homes, as their costs are significantly higher despite similar incomes.

  iii. Risk of excluding working families with genuine housing need: Many disagreed because the change would remove eligibility from working households who are still struggling, especially single-income families, households affected by disability, or those facing statutory overcrowding. Several felt this creates a group who earn "too much for help but too little to cope". There were fears this may disincentivise work.

  iv. Cost-of-living crisis not adequately reflected: Many felt that lowering the threshold during a prolonged cost-of-living crisis is unrealistic and unjustified, noting that wages have not kept pace with rising rents, food, energy and council tax costs.

- ***Recommendation:***
  Having a household income threshold aligned with average earnings is the direction of travel for most authorities. It is simple, is easily reviewed as it links to ONS data. The ONS state that 30% of income should be spent on rent in the private sector which equates to a rent of £976 (The ONS has the

average private rent at £1,567 per month), so there is some justification for the disagreement. As the overall agreement is 52% , officers felt there was justification for proceeding with a single figure aligning to average annual income.

18. **Savings, assets and investments - 23% disagreement.** The comments are summarised as follows:
    - **Agreement comments**
        i. Support for prioritising social housing for those with the least financial resources: Many respondents agreed that social housing should be reserved for households with little or no savings, so that limited homes are directed toward those in greatest need, including low-income households, people in temporary accommodation, and families affected by health issues or disability.
        ii. Alignment with welfare benefit standards seen as fair and consistent: A common reason for agreement was that setting the savings threshold at £16,000 to match Universal Credit and other welfare rules creates a clearer, more consistent system. Respondents felt this alignment would be easier to understand and fairer to administer.
        iii. Strong support for retaining exceptions for vulnerability: Even among those who agreed, there was clear support for exceptions to remain in place for households with medical needs, disabilities, or extreme vulnerability, recognising that savings may be needed for care, treatment or essential adaptations and do not always equate to real housing choice.
    - **Disagreement comments**
        i. Threshold seen as unfairly penalising saving and financial responsibility: Many respondents strongly disagreed with lowering the savings threshold, arguing that having savings should not disqualify households from social housing. They felt the proposal punishes people who have been prudent, worked hard, or saved as a safeguard against job loss. Additionally, this policy may act as a disincentive to save in the future, making people more financially unstable.
        ii. £16,000 viewed as insufficient to resolve housing need: A common criticism was that £16,000 - £20,000 is not enough to enable households to buy a home or sustainably rent in the private sector, particularly in high cost areas. Respondents noted that this amount can be quickly consumed by deposits, advance rent, moving costs, furniture, or emergencies, without providing long term housing security.
        iii. Insufficient recognition of life events and vulnerability: Many disagreed that the proposed exceptions would be adequate, raising

concerns that redundancy payments, inheritance, pension drawdowns, or savings for medical and caring needs could push households over the threshold and unfairly exclude them despite vulnerability or overcrowding.

iv. Perception of unfairness between different groups: Some respondents felt the policy overly favours households with no savings while disadvantaging working households, non dependants, older people, or those attempting to move towards independence, creating perceived inequities in access to support.

- ***Recommendation:***
  23% disagreement is just over the cut off and is less concerning. Slough already has a threshold of £20,000, aligning it with welfare benefits (£16,000) allows transparency and consistency around public services. Officers are recommending that this is adopted as the overall agreement is 61%.

19. **Adequately housed – 30% disagreement.** The comments are summarised as follows:
    - **Agreement Comments**
      i. Prioritising social housing for those not adequately housed: Many respondents agreed that social housing should be reserved for households who are genuinely inadequately housed, particularly people experiencing homelessness, living in temporary accommodation, or facing significant overcrowding. They felt excluding adequately housed applicants would help ensure limited homes go to those in most urgent need.
      ii. Temporary accommodation not viewed as adequate housing: Respondents commonly agreed that people in temporary accommodation should be excluded from the definition of "adequately housed" and continue to receive priority access to the Housing Register, especially where children's wellbeing, education, or stability is affected.
      iii. Strong support from households with disabilities or medical needs: Agreement was expressed by families affected by disability, SEN, or health conditions, who felt that excluding adequately housed applicants would help prioritise reassessment and rehousing for households whose current homes are actively harming health or wellbeing.

    - **Disagreement Comments**
      i. Definition of "adequately housed" seen as unclear and unrealistic: The dominant concern was that "adequately housed" is subjective and does not reflect lived reality. Many respondents argued that overcrowding, poor property condition, unsuitable layouts, inaccessible homes, sofa surfing, or living with parents are routinely labelled as "adequate" despite being unsafe, unstable, or harmful to health and wellbeing.

ii. Overcrowding and family size not recognised: Respondents strongly disagreed that households living in small properties with growing families should be excluded. Many felt families needing an additional bedroom due to children's ages, genders, or safeguarding reasons would be unfairly locked out of the register.
iii. Medical needs, disability, and ageing ignored: A common objection was that people with health conditions, disabilities, or age related mobility issues may technically be housed but still require moves to suitable or adapted accommodation. Preventing them from joining the register was seen as contrary to care and safeguarding duties.
iv. Private renting viewed as insecure and unaffordable: Many respondents rejected the idea that private renters are adequately housed. Rising rents, short tenancies, landlord sales, and benefit refusals were cited as creating chronic insecurity, meaning applicants are vulnerable even if they have a roof over their head today.
v. Risk of trapping people in unsuitable housing: Respondents warned the proposal would leave people stuck with no route to improvement. Being barred from the register removes the ability to plan ahead or respond to worsening conditions or life changes.

- ***Recommendation:***
  Adequately housed is standard industry terminology and relates to the housing need that will be considered under the Housing Allocation Scheme (captured in the banding table in the policy). The proposed change should be adopted subject to making the definition even clearer if necessary and what an applicant should do if they are rejected but their circumstances change in the future. With 52% agreement and with high levels of demand, officers felt there was justification to adopt this change.

20. **Refusal of a single suitable offer – 40% disagreement.** The comments are summarised as follows:
- **Agreement Comments**
  i. Support for consequences where an offer is genuinely suitable: Many respondents agreed that if an offer clearly meets an applicant's needs, refusal should carry consequences. They felt that refusing a suitable property indicates a lower level of housing need and that a penalty would help ensure fairness to others waiting. This would also prevent applicants "holding up" the system, thereby creating more movement and opportunities for those who have been waiting a long time.
  ii. Expectation that applicants in genuine need would accept an offer: A common view among those agreeing was that households in urgent need should be willing to accept a suitable property when offered, rather than having multiple choices, especially given pressure on housing supply.

iii. Support for clearer rules and accountability: Some respondents welcomed the proposal as a way to introduce clearer expectations, reduce perceived misuse of the Housing Register, and ensure that applicants take offers seriously.

- **Disagreement Comments**
  i. Single refusal seen as overly harsh and punitive: The dominant concern was that removing applicants from the Housing Register for 12 months after refusing a single offer is disproportionate. Many respondents felt one refusal does not indicate unwillingness to be housed, particularly given the long waits and high stakes involved.
  ii. Suitability viewed as subjective and inconsistently applied: Respondents strongly questioned who defines whether an offer is "suitable". Many felt suitability often focuses on bedroom numbers only, ignoring critical factors such as medical needs, disabilities, SEN requirements, safety, accessibility, layout, noise levels, parking, or proximity to schools, work, hospitals and support networks.
  iii. Risk of forcing acceptance of unsuitable or unsafe housing: Many feared the policy would pressure households to accept accommodation that may be inappropriate, unsafe, or damaging to health and wellbeing, including properties with damp, disrepair, poor maintenance, or located in areas connected to past trauma, domestic abuse, or safeguarding risks.
  iv. Disproportionate impact on vulnerable households: Respondents repeatedly highlighted that families with disabled children, people with medical conditions, survivors of domestic abuse, and those in temporary accommodation would be particularly disadvantaged. Refusing an unsuitable offer was seen as an act of protection, not "pickiness".
  v. Concern the policy could backfire system wide: Several respondents warned the proposal may increase appeals, objections, tenancy failures, and voids, as people accept homes out of fear rather than suitability, undermining stability and increasing long term costs.

- ***Recommendation:***
  With 40% disagreement, this is considerable. Currently they are suspended if they refuse and this places an unneessary burden on the Council. Going forward the majority of applicants will be placing bids for a property they are interested in. An applicant will only be removed from the register, if an offer is deemed suitable and the reason for refusal is deemed unreasonable. If the applicant is removed, they have a statutory right of review. This means that many of these fears raised in disagreement would addressed as part of the process. There is a need to create movement on the register, and with an agreement of 45% and the introduction of choice based lettings it recommended this is adopted.

21. **Same sex sharing - 42 % disagreement.** The comments are summarised as follows:

- **Agreement Comments**
    1. Acceptance as a pragmatic response to housing shortages: Many respondents agreed that increasing the age to 18 is a practical way to manage severe shortages of larger family homes. They accepted that requiring same sex siblings to share for longer could help prioritise scarce 4 and 5 bedroom properties for families experiencing the most acute overcrowding.
    2. Support for more effective use of limited housing stock: Respondents felt the proposal would allow the Council to allocate smaller properties to more families sooner, reducing waiting times and enabling households currently in unsuitable or temporary accommodation to move into more appropriate housing.
    3. Support linked to tackling under occupation: A number of respondents agreed when viewing the proposal alongside calls to review under occupied larger homes, suggesting that better management of existing stock combined with higher sharing ages could free up family sized properties.
    4. Conditional but clear agreement: Some respondents described the proposal as "not ideal but necessary", agreeing that while sharing is not always desirable, constraints on housing supply mean compromise is unavoidable in the short term.

- **Disagreement Comments**
    1. Teenagers' need for privacy and personal space: The most common objection was that young people aged 16 – 18 require privacy for dignity, changing, studying, and emotional wellbeing. Many respondents felt 16 is already too high an age threshold, and extending it to 18 risks harming mental health, education, and development.
    2. Age gaps make sharing inappropriate: Respondents strongly disagreed with a blanket rule that ignores age differences. Sharing between older teenagers and much younger siblings was widely described as inappropriate, stressful, and impractical, regardless of gender.
    3. Puberty, safeguarding and wellbeing concerns: Many highlighted puberty, neurodiversity, disability, trauma, and mental health as reasons why sharing until 18 could be damaging. Respondents felt the policy overlooks individual vulnerability and safeguarding needs.
    4. Adult status at 18: A frequent objection was that 18 year olds are legally adults, often studying, working, or forming relationships, and should not be expected to share a bedroom.
    5. Perception of lowering housing standards to manage shortages: Respondents felt the proposal manages housing supply at the expense of children's wellbeing, effectively lowering acceptable living standards rather than addressing overcrowding.

- ***Recommendation:***
  With 42% disagreement, this is considerable. Large properties are in short supply and waiting time is considerable. There is a need to make the best use of stock and the 18 year old threshold has been adopted by many Councils in similar positions. With 45% agreement, it is recommended that this is adopted.

22. **Community Contribution – 18% disagreement.** With less than 20% diagreement, it could be argued that this proposed change should go ahread. However there are a number of factors to consider:
    - The EIA raises a risk of discriminiation where anyone working would be considered over someone who is not.
    - The legal service raised this as discriminatoy.
    - Disgareement during the consultation raised a strong concern around fairness.

    CT experience has also been considered. Other authorities who have considered the introduction have withdrawn it following consultation and the EIA. Those who have it in their policy have made it dormant as it is deemed unfair and subject to challenge. The advice is to withdraw it completely from the policy and replace it with priority in Band B for anyone fostering or applying for adopting who may need a different sized property.

In Summation

23. The consultation is complete. It is recommended that that the changes with agreement of 40% or more be adopted, even where there is disagreement over 20%.

24. The Council may wish to reconsider the household income threshold. Some authorities have restricted the calculation to the main applicant and where relevant the joint applicant. Some authorities have reviewed priivate sector rents and introduced a differential income threshold based on property size. These are rare.

25. It is recommended that community contribution if removed in its entirety because of the risk of discriminiation and instead it is replaced with fostering and adoption in Band B in line with other authorities.

26. A full set of online survey result have been made available to the Council.
    - Final Results
    - Qualitative analysis

Author: Rachel Khan. Senior Associate Consultant, Campbell Tickell Ltd

CAMPBELL TICKELL

Get in touch to find out more

Tel: +44 (0)208 830 6777 www.campbelltickell.com

Campbell Tickell **campbell_tickell**

campbell_tickell **@ campbelltickell.bsky.social**