



G15 Response to the London Assembly's Call for Evidence on Allocations in Social Housing

October 2025



About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 850,000 homes across the country, including around one in ten homes for Londoners. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £1.5bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

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Executive summary

The G15 welcomes the London Assembly's review of how social housing is allocated in London – the epicentre of England's housing crisis. The limited supply of social homes, spiralling private rental costs, and a shortage of family-sized properties have contributed to widespread and long allocation waiting times. [Research](#) by the Centre for London highlights more than 323,000 households in the capital on waiting lists for social housing, an increase of over 33% since 2017. A shortage of larger properties has also led to particularly high waiting times for family-sized homes, with the wait for 4+ bed properties at 6 years and 3 months – four years longer than the wait for a one-bed property city-wide.

Overcrowding is a particularly acute issue in the capital, with 14.8% of social renting households affected – significantly higher than the private rented sector (9%) and owner-occupiers (1.7%)[1]. These pressures are driving a homelessness crisis, with London Councils now spending £5.5 million a day on temporary accommodation and homelessness support.

Moreover, 2021 analysis by the [National Housing Federation](#) suggests that more than a quarter of a million people in London had housing needs that would be best met by social housing. This figure has almost certainly increased since and highlights the scale of unmet demand across the capital. Therefore, a more consistent and transparent approach to allocations is urgently needed to ensure that limited housing resources are used fairly and effectively.

As major delivery partners, our members collectively house one in ten Londoners, providing homes for people on the lowest incomes and supporting residents to thrive. We have direct experience of how the allocation system operates across boroughs and the challenges this creates for residents and providers alike. Around three-quarters of relets and all new-build nominations are controlled by local authorities, which means that housing associations often have limited input in allocation decisions, despite being responsible for their long-term management and supporting community stability.

We understand that this is a difficult situation for local authorities, who are working to use the allocations process to improve outcomes for residents. However, our members see daily that the current system is not functioning as effectively as it could. Fragmented local approaches, constrained housing supply, and mounting resource pressures have created inconsistent allocation practices between boroughs. As a result, residents with similar needs can experience vastly different outcomes depending on where they live or apply. In some areas, homes are relet swiftly and transparently; in others, long delays and opaque decision-making erode trust in the system and undermine confidence in its fairness.

Local control is a vital principle within the allocations system, but there is scope to better align local discretion with a more consistent pan-London approach. Greater alignment on nominations, turnaround times and data-sharing would help improve efficiency, transparency and fairness for residents. Shared expectations between boroughs and housing associations on nominations, adequate resourcing for allocations teams, and better data-sharing and transparency on decision-making would all strengthen outcomes. A renewed focus on [inter-

tenure] mobility and right-sizing would also make best use of the limited social housing available.

The allocations system should reflect the full diversity of Londoners and support strong, sustainable communities. That means addressing under-occupancy within London's social housing stock. While difficult to solve, the allocations system may offer the most effective route to freeing up larger, family-sized homes and ensuring that social housing is used as efficiently as possible. Robust evaluation is essential to tackling this issue and we support gathering improved data on outcomes, including the number and type of homes freed up, to guide future policy.

We also recognise that the success of the allocations system depends on a well-functioning supported housing sector. Without sufficient supported homes, residents with complex needs are often placed in general needs housing, where their needs are not fully met and community cohesion can suffer. This is particularly an issue in blocks and flatted estates where households live closely together, which is a common feature of social homes in London.

The Mayor's ambition to end rough sleeping by 2030 will only be achievable if services, resources and skilled support staff are in place to provide support for these residents. The G15 encourages the Mayor and the London Assembly to continue pressing central government for long-term, ringfenced funding for supported housing and support services, building on the success of the former Supporting People programme. Development plans should also make provision for supported housing, as current numbers are falling – with one in three providers nationwide closing schemes due to funding pressures and 60% saying they may be forced to close in future. Addressing digital exclusion and improving the accessibility of transfer systems for older and disabled residents must also form part of this approach.

Embedding downsizing incentives into planning is also vital. We believe that exploring a London-wide model whereby housing associations retain a limited number of new-build homes secured through Section 106 agreements – ring-fenced for internal moves to help facilitate downsizing – would support older households to move and free up larger homes more quickly. While some residents may not want to move into new-build properties due to personal preferences, these homes could still enable internal chains, allowing another resident to move and in-turn create a suitable option for a downsizer.

Together, these changes would strengthen fairness, choice and outcomes within the allocations process. While London's housing crisis cannot be solved through allocations reform alone, improving how homes are allocated is central to making the system work better for those in need. G15 members are ready to work with the Mayor, boroughs and government to create a simpler, fairer and more consistent framework that gives residents clarity, makes best use of homes, and supports long-term social and economic outcomes across the capital.

Questions:

To what extent are social housing allocation policies equitable? Are they applied equitably in London?

Members do not find that allocation policies are applied consistently or equitably across London. Outcomes vary significantly between boroughs, shaped by local priorities, political pressures, available resources, and variations in local criteria such as residency requirements or employment-related priority, which can mean that households with similar needs are treated differently). This fragmented approach can limit the system's ability to respond effectively to London-wide housing need, particularly for larger families, adapted homes, and supported housing.

Around 75% of our relets and 100% of new-build nominations are controlled by local authorities, which means housing associations have limited influence over how nominations are applied in practice. While this structure reflects local democratic decision-making and accountability, it can also result in differing approaches and outcomes between boroughs, sometimes leading to inefficiencies or longer void periods. Many nomination agreements are also old; while they might have been fit for purpose at the time, they do not necessarily meet the challenges of the housing environment we operate in today.

We recognise that local authorities are operating under immense pressure. Years of funding reductions, high demand and staff shortages make it difficult for many boroughs to process nominations quickly or maintain up-to-date allocations systems. These pressures inevitably affect consistency and transparency across London, even where intent is fair. Some boroughs can process nominations swiftly, while others face unavoidable delays, which can mean longer waits for residents in urgent need and homes left empty for longer than necessary.

Members would welcome a pan-London shared framework between boroughs and housing associations that improves consistency, promotes transparency and sets clearer expectations on nomination turnaround times, while balancing local priorities with broader regional demand. Establishing minimum standards across London would help ensure policies are better aligned with both local and regional needs.

We also note how councillor and MP enquiries can sometimes result in residents being prioritised for housing ahead of others with equivalent need. This creates a perception - and at times a reality - where those who are more vocal or better connected are housed more quickly, undermining the principle of fairness in allocation.

How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

As local authorities hold the statutory duty for allocations, housing associations have limited influence over who is nominated. However, members report systemic disadvantages.

Digital exclusion is a growing concern, and inconsistent application processes across boroughs can further disadvantage certain groups. Increasing reliance on online systems risks marginalising residents without reliable internet access or digital literacy, creating barriers that reduce fairness and accessibility. In one G15 member area, research found that around one in five households lack internet access, making it difficult to apply or bid for homes and stay engaged with housing moves. More transparent and standardised approaches would improve equity and ensure all residents can access allocations fairly.

Older and disabled residents also face barriers when seeking to move. For example, some cannot find suitably adapted homes or ground-floor units (often due to the lack of availability) and others struggle because the support to manage the move. Members offer practical help where possible, including completing application forms with residents, registering accounts in Housing Jigsaw for those seeking sheltered housing or with medical priority, notifying older persons' services for sheltered housing requests, and adding residents to the medical watch list when a medical move is needed. Despite this support, resources are limited, and these processes can still be challenging for residents

At the same time, allocations are increasingly concentrating residents with higher support needs - including those with mental health and substance misuse issues - into general-needs blocks, whereby they may be better served being allocated a supported housing property, so their needs can be catered for. Better information sharing between boroughs, housing associations and support services is integral to ensuring homes are allocated appropriately and to sustaining tenancies. Without this coordination, placements can undermine community cohesion and place significant strain on management services. This highlights the crisis facing supporting housing, and the need for the Government to provide:

- Emergency funding to prevent further scheme closures
- A sustainable funding solution for support services in supported homes at the Autumn Budget and the forthcoming housing and homelessness strategies
- Enough allocation to the new Social and Affordable Homes Programme (SAHP) so there is funding to build new supported and older person's housing.

Members also note rising perceptions of unfairness within the system among some groups. National (CORE) data for 2023/24 show that 87 % of lead tenants in new social housing lettings were UK nationals and 76 % were White British; these figures provide context to perceptions among some white British residents that allocations may unfairly favour others. This perception risks eroding trust in the system. Transparency about allocation outcomes and why decisions are made would help counter misinformation and support social cohesion.

To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

Under-occupation remains a major inefficiency in the system. Most members have under-occupancy policies and incentive structures in place to encourage downsizing moves. However, we understand that the current incentive payments (typically in hundreds of pounds per spare bedroom) is too low to motivate moves, and this is typical across London. Some boroughs offer more generous schemes; for example, Camden's pilot Tenant's Option Fund (TOF) offered tenants aged 60 and over £5,000 plus £1,500 per bedroom released to move to a one-bedroom home, leading to a 16% increase in applications to downsize and a 75% increase in the number of downsizing moves via the allocations scheme, according to their [January 2018 report](#). The scheme continues to offer tenants aged 60 and over £3,000 for each bedroom reduction and £1,500 per bedroom for those aged 59 and under. Unfortunately, such initiatives are rare.

The barriers to downsizing are well known; emotional attachment to family homes, lack of suitable alternative properties (especially adapted or ground-floor homes), and limited practical help with the logistics of moving. Even where residents want to downsize, they often cannot find a home that meets their health or location needs.

Members agree that financial incentives alone are insufficient. Successful downsizing schemes combine money with wraparound support, tailored assistance for older residents and those with disabilities, as well as practical and administrative support, including help with packing, removals, and managing bills. They also rely on trusted intermediaries, such as housing officers and community organisations, to build confidence, raise awareness and encourage participation. This integrated approach strengthens boroughs' under-occupation strategies and better encourages residents to move where appropriate. Additionally, offering new-build homes as part of a downsizing incentive has also proven effective, as residents are more willing to move for a higher-quality property. Alongside this, a coordinated campaign to promote the incentives or other housing options – such as mutual exchanges or local authority transfer schemes – could further support mobility. Encouraging residents to register for multiple routes and introducing a single application process that enables them to apply for several options at once would streamline the system and make it easier for people to move.

A coordinated, pan-London approach to mobility – rather than a patchwork of borough-led initiatives – would deliver greater impact. Perhaps the Mayor could explore a London-wide initiative whereby housing associations are able to keep a limited number of new-builds acquired through section 106 agreements to be allocated at the provider's discretion. These properties could be ringfenced as options for residents who want to downsize – increasing the pool of desirable property options into which they could move. Policies that enable transfers into shared ownership or intermediate rent could also help free up social rent homes. Moreover, MHCLG should allocate enough of the new Affordable Homes Programme funding to the building of new supported and older persons' housing.

We also note that policy changes to encourage downsizing must balance the need to free up larger homes with the financial impact of creating additional voids.

How could the Mayor and/or government improve the allocation of social housing in London?

The G15 supports a more consistent, transparent approach to allocations across London. This includes expanding pan-London mobility through mutual exchange (which remains the most effective route for mobility), and Housing Moves, improving digital infrastructure and data-sharing between boroughs and landlords, and standardising IT systems to manage nominations efficiently. Better data-sharing would help reduce void times and support smoother resident moves.

Platforms such as House Exchange HomeSwapper, the latter of which one member processes around 20 exchanges a week through, allow residents to move across landlords and regions without creating voids. While these platforms offer valuable opportunities for mobility, there are also specific issues and limitations that can affect certain residents. For example, while House Exchange offers nationwide swapping opportunities, its public listing can create a safeguarding risk for residents fleeing domestic violence, making it less suitable for these tenants.

We recommend that these improvements are accompanied by clear incentives for boroughs and housing associations to participate, so they can see tangible benefits for their residents. Transparent information and practical relocation support (such as guidance on demographics, costs, and adapting to change) will help build confidence in these moves.

Finally, flexibility in planning mechanisms, including Section 106 and the Community Infrastructure Levy, should be used to support a better mix of homes and encourage right-sizing, ensuring that new-build tenure and bedroom mixes reflect the needs of local waiting lists, making the best use of limited social housing stock.

The G15's *Building Together, Building Better* [guidance](#) for developers highlights that early engagement between developers and housing associations on Section 106 terms is crucial to achieving this. Aligning affordability levels, market restrictions, and nominations agreements with housing associations' lettings policies would help to ensure that homes can be funded, built, and allocated efficiently. Delivery programmes should also be agreed from the outset, with mechanisms to manage changes and ensure accountability. These steps would create a smoother pipeline from planning to allocation and help ensure that new social homes meet both local and pan-London housing priorities.

Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?

G15 members offer limited direct inter-tenure mobility. Members can, for example, signpost social tenants to shared ownership where appropriate, but does not actively manage moves between social and intermediate tenures. Some providers operate their own transfer lists and incentive schemes, but these do not always align with borough priorities or systems, limiting their overall impact. We understand that very few residents who would have qualified for social housing in the first place may find themselves in a situation whereby they could afford to move

to intermediate market rent (IMR) or market rent (MR) properties. Even where residents could afford to move, there is limited incentive to leave lower-cost social housing.

Furthermore, under-occupancy remains under-addressed. While some residents are willing to move, the lack of cross-borough alignment, limited supply of suitable/desirable smaller homes, and low incentives make downsizing difficult, particularly as rent-setting structures can mean that residents moving from a larger home may face higher rents in a smaller property, creating a further barrier to moving. Older residents in particular face practical barriers to mutual exchange, which is often the most effective route. Wraparound support, including help with removals and administrative tasks, would be more effective than financial incentives alone.

Members agree that strengthening inter-tenure mobility would improve overall housing efficiency, but this requires coordination with local authorities and registered providers, standardised processes, better data sharing between partners, and London-wide incentives for moving into smaller homes.

We fully support the Mayor's ambitions to address under-occupancy in the social rented sector, but it is important to recognise that under-occupation is also prevalent in the private rented sector, where affordability constraints and limited suitable alternatives make it difficult for residents to downsize. Tackling this issue across tenures would help make better use of London's overall housing stock.

To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?

London's housing shortage amplifies allocation challenges. High demand for a limited supply of family-sized homes and flats skews allocations, often concentrating residents with high support needs (e.g., substance and mental health issues, domestic abuse cases) in blocks and estates in one- or two-bed flats. Consequently, the system creates additional management pressures and risks undermining social cohesion.

Resource constraints and IT infrastructure within boroughs lead to delays in nominations, compounding void loss and slowing residents' moves. Borough-specific practices vary widely, with some controlling all internal transfers and others operating shared arrangements. While local discretion is important, these variations make pan-London consistency difficult and can disadvantage residents depending on where they live.

Members note that out-of-London mobility is underutilised. Residents who might downsize or relocate are often deterred by limited stock, mismatched demand, lack of awareness, and inconsistent borough participation. Out-of-area moves can also result in a loss of social networks or difficulties in accessing jobs and schools. Policies and schemes that actively support such moves, with practical assistance and data-driven guidance, would help address the supply-demand imbalance and build confidence in relocating.

A case study from one of our members shows that around 600 residents are registered for Seaside and Country Homes, yet very few are actually rehoused, highlighting the limited impact of the scheme. Members would like to see Seaside and Country Homes refreshed or better integrated with local borough allocations platforms, with expanded stock options, clearer communication, and improved coordination across boroughs.

Housing Moves plays a valuable role but remains limited in scale, reach, and visibility compared to national platforms like House Exchange. Members also face competing priorities when allocating homes to Housing Moves, including fulfilling local authority nomination obligations, managing internal transfer lists, and minimising void loss to ensure those in need are rehoused quickly. Eligibility rules can also be restrictive, excluding households who could benefit from a move that better matches their housing need. Allowing tenants to use both Housing Moves and House Exchange simultaneously would increase opportunities and support greater cross-tenure and cross-landlord mobility.

G15 supports the Mayor's goal of pan-London consistency and recommends practical steps to achieve this, including standardised IT systems, enhanced data-sharing, and incentives for boroughs and housing associations to participate, ensuring residents benefit from improved mobility options.

[1] [Greater London Authority. \(2024\). Housing in London 2024](#), page 56.