

Report to:	Cabinet Member - Housing and Highways	Date of Issue:	19 June 2024
		Date of Decision:	27 June 2024
Subject:	Local Lettings Plan Request Coronation Road, Crosby		
Report of:	Assistant Director of Place (Economic Growth & Housing)	Wards Affected:	Victoria
Cabinet Portfolio:	Housing and Highways		
Is this a Key Decision:	No	Included in Forward Plan:	No
Exempt / Confidential Report:	No		

Summary:

To seek approval to agree to a Local Lettings Plan for Coronation Road, development in Crosby.

Recommendation(s):

(1) That Cabinet Member approves the use of a Local Lettings Plans by Plus Dane for the new development at Coronation Road in Crosby.

Reasons for the Recommendation(s):

The proposal will assist Plus Dane (the provider) achieve a balanced community and a mix of people for the new build development in Crosby, whilst still providing housing for those residents most in need.

Alternative Options Considered and Rejected: (including any Risk Implications)

The Council could withhold approval from Plus Dane to operate a Local Lettings scheme

What will it cost and how will it be financed?

(A) Revenue Costs

There are no additional revenue costs arising from the proposals in this report

(B) Capital Costs

There are no additional capital costs arising from the proposals in this report

Implications of the Proposals:

Resource Implications (Financial, IT, Staffing and Assets): NA
Legal Implications:

Section 167 of the Housing Act 1996 requires Local Housing Authorities to have an Allocations scheme for determining priorities in allocating housing accommodation.

Equality Implications:

An Equality Impact Assessment has been completed and included within this report

Contribution to the Council's Core Purpose:

Protect the most vulnerable:

Through the prioritisation of those residents in the top two bands and in most need of social housing

Facilitate confident and resilient communities:

Proposals help maintain community stability

Commission, broker and provide core services:

The Council works with Registered Providers through Property Pool Plus to deliver its social housing allocations policy

Place – leadership and influencer:

NA

Drivers of change and reform:

NA

Facilitate sustainable economic prosperity:

NA

Greater income for social investment:

NA

Cleaner Greener

NA

What consultations have taken place on the proposals and when?

(A) Internal Consultations

The Executive Director Corporate Resources and Customer Services (FD 7645/24) has been consulted and notes the report indicates no direct financial implications for the Council in respect of these proposals.

Chief Legal and Democratic Officer has been consulted and has no comments on the report (LD5745/24)

(B) External Consultations

Plus Dane have consulted with the three Councillors of Victoria Ward on this proposal and Officers of the Council. The proposal will be decided by Cabinet Member Housing & Highways.

Implementation Date for the Decision

Following the expiry of the “call-in” period for the Minutes of the Cabinet Meeting

Contact Officer:	Graham Parry
Telephone Number:	0151 934 3927
Email Address:	Graham.Parry@sefton.gov.uk

Appendices:

The following appendices are attached to this report:

Appendix A; Local Lettings Plan Coronation Road, Crosby

Appendix B: Equality Impact Assessment Coronation Road, Crosby

Background Papers:

Merseyside Property Pool Plus Allocations Policy <http://www.propertypoolplus.org.uk>

1. Introduction/Background

1.1 Plus Dane housing association are pursuing a New Build scheme at Coronation Road, Crosby through a Section 106 Planning Agreement. The development will include 39 rented apartments across 3 storeys with lift access and 13 apartments per floor. The property breakdown is as follows;

- **24 x 1-bedroom apartments**
- **15 x 2-bedroom apartments**

1.2 Plus Dane propose the use of a Local Lettings Plan (LLP) to allocate the properties on the site. The Council's own Allocations Policy (Property Pool Plus) Section 2.2 states:

Local Letting Schemes

4.3.1 The local authority and registered providers can use local lettings schemes to achieve a wide variety of housing management and policy objectives subject to agreement with the local authority. The following list is intended to be illustrative and in no way prescribed or definitive:

- 1. Allocating accommodation in rural villages and giving priority to applicants with a connection to a particular parish.*
- 2. Creating more mixed and/or sustainable communities.*
- 3. Dealing with a concentration of deprivation.*
- 4. Ensuring properties that are particularly suited to being made accessible (e.g. ground floor flats) are prioritised for those with access needs.*
- Property Pool Plus Housing Allocation Scheme Procedure*
- 5. Relocating essential workers such as teachers, nurses and police officers within a reasonable travelling distance from their work.*
- 6. Supporting people in work/volunteering or who are seeking work or seeking volunteering opportunities.*
- 7. Dealing sensitively with lettings in rural areas to sustain communities by giving priority to those with a local connection of more than two years.*
- 8. Where a child to adult ratio could be lowered on an estate where there is high child density or, conversely, young single people could integrate into an estate where there is high ratio of older persons.*

9. Where there are reasons to positively discriminate due to age, for example accommodation is only suitable for applicants under the age of 35 years, or over the age of state pension entitlement.

- 1.3 The statutory basis for “local lettings policies” is within Section 167(2E) of the 1996 Housing Act which enables accommodation to be allocated to people of a particular description, that fall within the reasonable preference groups, or provides that additional priority can be given to people in any of those preference groups.

In 2010, the Communities and Local Govt Department and Chartered Institute of Housing issued a Good Practice guide for the use of Local Lettings Plans. This recognises that Local lettings policies may be used to achieve a wide variety of housing management and other housing policy objectives. For example, local lettings policies may be used to “protect existing stable communities”, and “improving community stability and cohesion”. The guidance also describes the use of ‘Sensitive Lettings’ which can be used to address specific issues, such as the make-up of a particular block of flats, ie. having the ability to by-pass applicants to avoid potential lifestyle clashes that could arise by rehousing certain groups of applicants under one roof.

- 1.4 The PPP Allocations Policy is principally designed for the allocation and letting of individual properties. In many new-build developments housing associations are letting multiple properties at the same time; in this case 39 new affordable rented homes. The proposal from Plus Dane, below, sets out their reasoning for an LLP and how the LLP would operate.

- 1.5 In summary, 60% of the properties will be allocated to applicants who are in employment:

- Band A – 10 – (6 x 1-bed & 4 x 2-bed) (40%)
- Band B – 10 – (6 x 1-bed & 4 x 2-bed) (40%)
- Band C - 2 (2x 1-bed, 2x 2-bed) - (20%)

The remaining 40 % of homes will be allocated to applicants who can demonstrate they are making a community contribution as set out the in the Property Pool Plus allocation policy, namely:

- Engaged in voluntary, active resident involvement or unpaid employment for a minimum of 16 hours per week for a minimum of 6 months. This includes Regular or Reserve Armed Forces Service.
- Engaged in further or higher education, either part-time or full-time, for a minimum of one term.
- Unable to be involved or participate in the community due to an illness, disability, age, gender or any other characteristic or circumstance.

The initial lettings of these 39 properties and any subsequent re-let within the first twelve months will be made in accordance with this proposal. It is intended that this Local Lettings Policy shall apply to the first lets only. Plus Dane’s plan to allocate all the 39 properties from PPP, is seen as a positive.

Appendix A

Local Lettings Framework

Plus Dane Housing

Contact: Gaynor Nicoll

Tel: 0800 169 2988

email: customer@plusdane.co.uk

Coronation Road, Crosby, L23 5SF

Introduction

This Local Lettings Policy (LLP) has been developed to deliver sustainable lettings for the new build homes at Coronation Road, Crosby. L23

There are 39 rented apartments across 3 storeys with lift access and 13 apartments per floor. The property breakdown is as follows;

24 x 1-bedroom apartments
15 x 2-bedroom apartments

The allocation of many apartments in a single location, increases risks to both Plus Dane and the wider community if appropriate and sustainable lettings are not achieved.

Plus Dane therefore proposes to vary the standard allocations criteria for the prioritisation of applicants for these homes.

Aim of the framework

The aim of the Local Lettings Policy is to make a significant contribution to the overall sustainability of the area by helping to identify suitable tenants, who will settle and contribute to the local community, ensuring tenancies are sustainable for the long term.

As Coronation Road is a new development to the community, we want to ensure that we create a balanced and sustainable community from the beginning by identifying suitable tenants who will settle and make a positive contribute to the local community, ensuring tenancies are sustainable for the long term.

We aim to achieve this by housing a mix of different households, with different lifestyles and economic profiles, whilst at the same time, still providing housing to residents in housing need.

In addition, we aim to protect the capital investment made by Plus Dane through the delivery of sustainable tenancies.

Background

Coronation Road, set in the Victoria Ward of Crosby, is a new build scheme of 39 flats in the centre of Crosby. Handovers are scheduled to take place at the end of August 2024.

Demand and letting potential

The figures below provided by Property Pool Plus on 15 April 2024, demonstrate the demand for 1- and 2-bedroom homes across Sefton.

However, it should be noted that the figures shown cannot identify which area of Sefton or what type of accommodation an applicant would prefer to move too, so not all registered may want to move to an apartment style building in Crosby.

	1	2	Grand Total
Band A	301	150	451
Band B	749	580	1329
Band C	654	513	1167
Grand Total	1704	1243	2947

Proposal for scheme

The Local Lettings Policy will apply to the first lets of homes owned by Plus Dane Housing on the Coronation Road development and is intended to create a mixed scheme of applicants.

The content of this framework does not divert from the main principles of Property Pool Plus (PPP) Allocation Policy, and we remain committed to rehousing people in housing need.

Homes will be advertised through Property Pool Plus, however, we intend to include a local lettings criterion to ensure the sustainment and reputation of the new development and the community.

It is intended that a local lettings policy will apply on the first let to safeguard the reputation of the development and the significant investment being made in the new homes.

Specifically, this means for this this scheme that priority for applications will be given to those who:

- Are economically active to ensure an economic balance of incomes and to prevent a concentration of resident's wholly dependent on benefits.
- Are local volunteers, making a contributing to the local community.
- Have a local connection to the area.
- Do not have a history of criminal or anti-social behaviour.

Under this framework, to help us achieve the letting criteria, the following targets are proposed:

- A split between housing need bands as detailed in the table below to ensure we have a scheme of tenants with different lifestyles to help create a sustainable development.
- 60% will be prioritised to applicants who are in employment. All applicants will be subject to financial assessments to ensure affordability and sustainability.

	One bed – 24	Two beds - 15	Employment 1b	Employment 2b
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Band A 40%	10	6	6	4
Band B 40%	10	6	6	4
Band C 20%	4	3	2	2
Total	24	15	14	10

The remaining 40 % of homes will be allocated to applicants who can demonstrate they are making a community contribution as set out the in the Property Pool Plus allocation policy, namely:

- Engaged in voluntary, active resident involvement or unpaid employment for a minimum of 16 hours per week for a minimum of 6 months. This includes Regular or Reserve Armed Forces Service.
- Engaged in further or higher education, either part-time or full-time, for a minimum of one term.
- Unable to be involved or participate in the community due to an illness, disability, age, gender or any other characteristic or circumstance.

In the event of insufficient demand, we will discuss alternative letting strategies with the LA.

Proposal detail

We **will** give 60% preference to applicants in continuing employment, making a continuing contribution to the community.

To ensure we create a balanced community on first letting, we may give preference to an applicant who fulfils this requirement above another applicant in greater housing need.

We **will** give preference to households able to demonstrate a stable and continuing employment history. All applicants will be subject to financial assessments to ensure affordability and sustainability.

We will **not** allocate to any household who have previously held a tenancy and are unable to provide satisfactory tenancy references for the preceding 2 years. For those households who have not held a tenancy before, an alternative reference such as one from an employer will suffice.

We will **not** allocate to any household that has been investigated and formally served with a written warning for breach of tenancy within in the previous 2 years.

We will **not** allocate to any household where any member of the household has criminal convictions, recorded against them within the previous 2 years which make them unsuitable to be a tenant in the Crosby area.

If there is concern their activities have not abated and will have a negative impact on these properties, neighbours or surrounding community, an offer may not be made or withdrawn. This will be subject to information provided through a police check.

Where an applicant is rejected based on their criminal record or past anti-social behaviour they will be notified with an explanation as to why they are deemed unsuitable to

be a tenant and given advice as to what steps are available to them to make them suitable to be a tenant in the future.

How the Local Lettings Plan will be applied

Selection Process

The properties will be advertised on Property Pool Plus advising applicants that a Local Letting scheme is in place and applicants will be required to satisfy the criteria specified.

We will continue to give priority to suitable applicants in accordance with the appropriate banding and date order system but shall give priority to those in employment where they can demonstrate they have sufficient finance to pay the rent.

Applicants given priority for employment should be working 16 hours or more at the close of the bidding cycle and be able to provide as evidence a contract of employment, letter from employer and/ or recent wage slips.

Volunteers must have been volunteering for a continuous period of at least 6 months up to close of the bidding cycle and be volunteering up to the point of offer and have been volunteering for a not-for profit organisation or a charity registered with the charity commission.

Applicants will be required to fully occupy the property in line with current bedroom eligibility needs.

In addition, applicants must demonstrate a local connection to the Crosby area of Sefton.

In keeping with our Policy for allocating flats, the LLP does not alter our approach which is:

- Flats – Ground floor - in the first instance will be offered to applicants who need ground floor for health reasons. Should there be no applicants with health/care/support needs preference will be given to families with young children under five followed by all other applicants.
- Flats – above ground floor – due to the practicalities of living in flats with young children, preference will be given to families with children above 5 years of age.

Before any offer is made, all applicants will be required to undergo a formal interview, including a full reference check, when the local letting criteria and any additional checks that may be necessary will be discussed in detail.

As part of the interview process, all applicants will undergo an Entitled to assessment to ensure they are claiming their full benefit entitlement. In addition, to ensure the sustainment of the scheme, as a matter of course each applicant will be offered a tenancy sustainment referral to our in-house floating support team and, if required, we will sign-post to debt management support if it is needed.

Monitoring, Conclusion and Review

If the approach described above does not deliver a mix of residents to achieve sustainability of the scheme an alternative approach will be implemented.

Any decision to move to an alternative approach will be discussed and agreed with Property Pool Plus.

It is intended that this Local Lettings Policy shall apply to the first lets only. When a property on this development becomes available in the future, it will be advertised in accordance with our general Lettings Policy.

We will use the following indicators to measure the overall success of this Local Lettings Plan.

- Average length of tenancy
- Turnover of homes
- Number of Anti-Social Behaviour reports

Things to consider

LLPs will not be approved where blanket exclusions are evident. In relation to previous convictions, these should not be considered to constitute an automatic barrier to access, especially for low-risk offenders. Eligibility should only be in question if there is reason to suppose that the ex-offender is likely to pose a risk to their household, neighbours and / or the wider community. Restrictions in an LLP should not contradict those of the overall allocations policy and any assessment of risk should be consistent.

Appendix B

EIA-Rapid Impact Assessment	
Name of policy: Local Lettings Policy – Crosby Coronation Road	Is this a new service or policy? New
Person responsible for assessment: Gaynor Nicoll	Date completed: 29 April 2024
<p>What are the aims, objectives and purpose of the policy or service?</p> <ul style="list-style-type: none"> • The aim of the Local Lettings Policy is to make a significant contribution to the overall sustainability of the area by helping to identify suitable tenants, who will settle and contribute to the local community, ensuring tenancies are sustainable for the long term. The policy supports our lettings policy objectives which are to: <ul style="list-style-type: none"> • ensure our homes are let in a fair, transparent and efficient way; • support the local authority’s strategic housing function; • give people choice through participation in choice based letting schemes; • make best use of available stock and create sustainable communities • minimise the time that properties are left unoccupied; • allow us the opportunity to market our homes in a diverse, accessible and innovative way. 	
<p>Who does the policy or service affect?</p> <p>All customers who express a wish to move to Plus Dane’s new development at Coronation Road, Crosby</p> <p>.</p>	
<p>1. Working through the questions below, are there any concerns that:</p> <ul style="list-style-type: none"> • the policy or service could affect people differently because of their ethnicity, gender, sexual orientation, age, disability, religion belief or social economic circumstances, or • that the needs of people in any of these groups will not be met? <p>(NOTE: For comments that apply to all diversity strands, rather than repeat the comment against each strand, complete the summary box below)</p>	

Characteristic	Impact	Summary:
Ethnicity People from different ethnic background including travellers & gypsies)	No <input checked="" type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of Race or Religious belief Where there are language difficulties / language limitations, the services of a translation service will be utilised.
Gender Between men & women	No <input checked="" type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to men and women. Applicants can speak with either a male or a female Officer to discuss their housing needs.
Sexual Orientation People with difference sexual orientations	No <input checked="" type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of sexual orientation. Same sex couples are recognised within the bedroom standard criteria
Age People of different ages including young, older people and children	Yes <input type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of age. However, as this is a development of flats, our priority is to not consider families with children under age 5 for flats above the first floor. This is in recognition of the evidence that living in flat accommodation is not practical or in the best interest of a young child. A household member age restriction applies to the flats due to the practicalities of living with young children in flats above the first floor with lack of play and outside space. The law and Property Act 1925 prevents minors from holding a legal estate in land. Therefore, people aged 16 and 17 years cannot hold a tenancy in their own name. In keeping with Plus Dane's Lettings Policy, we will not consider applications for this scheme from applicants under 18 years.

		<ul style="list-style-type: none"> We shall support young applicants by sign posting to support agencies and by advising them of relevant supported housing schemes were appropriate
<p>Disability (including mobility, hearing, HIV, visual impairment and people with mental health problem)</p>	No <input type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of their disability. The scheme provides limited rehousing opportunities for applicants with mobility difficulties, although there is a lift in the scheme, the scheme itself is not purpose built to wheelchair standards. All apartments have a shower over the bath, there is no level access bathing at the scheme. Accompanied viewings are offered to all customers and we will discuss any support needs with all customers to ensure provisions are in place for the start of the tenancy. We can arrange a British Sign Language interpreter if required at viewing or sign up, for hearing impaired customers Residents with an identified ground floor need will benefit as they will be prioritised for ground floor accommodation
<p>Faith / religious belief People with different religions or beliefs</p>	No <input checked="" type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of faith or religious belief Applicants with a religious preference for a shower will find we have showers installed over the bath
<p>Transgender Peoples whose gender identify is not the same as that assigned at birth</p>	No <input checked="" type="radio"/>	<ul style="list-style-type: none"> The LLP will apply equally to all applicants irrespective of their gender identity
<p>Other socio economic factors such as an emerging communities, people living in geographical areas, migrant</p>	Yes	<ul style="list-style-type: none"> Under the LLP 60% of allocations will be prioritised to applicants in employment, however the LLP is not

<p>workers, people with a criminal record, people on low income</p>		<p>100% ring-fenced based on economic circumstances, it includes 40% equivalent priority for volunteers and carers and those not able to make a community contribution due to illness, age, gender or any other characteristic or circumstance</p> <ul style="list-style-type: none">• Credit checks will be undertaken for all applicants who are to proceed to an offer• Entitled too benefit assessments will be completed for all applicants. This is to ensure the customer is claiming all benefits they are entitled too which in turn helps ensure they can meet their rental obligations meaning we do not set them up with a tenancy they will be unable to afford and sustain.• All applicants are required to provide a weeks rent in advance. This is in line with the terms of the tenancy agreement. Where applicants are unable to do this we will not proceed with the offer. This requirement is explained at advert stage and during the pre-allocation stage giving applicants sufficient time to understand the requirement. consider.• Applicants with an offending history that make them unsuitable to be a tenant will be excluded from the first lets. This is a necessary restriction which applies to all characteristics for the reputation of the scheme• The scheme has a local connection criteria giving priority to applicants with a local connection to the Crosby area. Although this will disadvantage applicants not from the local area, this will ensure local residents are given a priority benefit for much local needed accommodation. This criterion will affect all protected characteristics
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Summary of impact assessment:

The impact assessment is medium

It is acknowledged that the Local Lettings Plan may impact on applicants from all protected characteristics due to the additional lettings criteria, such as the requirement to be in employment, requirement to have a local connection and those who may have an offending history. This impact is necessary to ensure we get the balance of allocations correct to protect the reputation of the scheme and maximise sustainability of new tenancies

This impact has been mitigated by introducing a % of lets between each band, widening the reach of applicants who can be housed.

This impact is temporary as it relates to the first let of the scheme to ensure its long-term viability and community contribution. As Coronation Road is a new development, we want to ensure that we create a balanced and sustainable community from the beginning by identifying suitable tenants who will settle and make a positive contribute to the local community, ensuring tenancies are sustainable for the long term.

We can only achieve this by housing a mix of different households, with different lifestyles and economic profiles, whilst at the same time, still providing housing to residents in housing need.

The LLP reinforces our commitment to the local area and provides an opportunity for applicants with a real commitment to the area to be priorities and this will be applied to all protected characteristics.