Context and Background

Homelessness in Bristol has been rising. Before COVID 19 there were over 600 households in Temporary Accommodation, 100+ people rough sleeping, 120 people in night shelters and over 1100 households in some form of supported housing. As part of our COVID response we have closed the night shelters and reduced the number of people sleeping rough to the 30s. To do this we have used hotels to temporarily house people and currently have 230 people that need to be moved on before the hotels close at the end of September 2020.

BCC have anticipated that it will need to source and supply in the region of 940 units of additional accommodation over the course of the coming year in order to meet demand. Key to meeting current and ongoing demand will be for BCC to secure some arrangements with larger portfolio landlords and developers. Imperial Apartments is BCC’s first arrangement of this kind and, through a five year* Nominations Agreement with Caridon Group will produce a significant supply of Private Rented Sector accommodation for a range of Bristol citizens.

Aims and Objectives of this Lettings Plan

To work with Caridon and other key stakeholders to achieve a sustainable and balanced community at the Imperial Apartments development. This will contribute to meeting varying housing needs of individuals and families across the city, and in particular contribute to the range and supply of move-on accommodation required by the city council and its partners for those who are homeless and at risk of homelessness in Bristol.

The aim of this Lettings Plan is to achieve the following objectives:
1. To create and sustain a safe and secure environment which our citizens aspire to live in.
2. To create sustainable individual tenancies, including ensuring that the properties are affordable for the customers to maintain.
3. To create a balanced and diverse housing development that integrates well into the local community.
4. To ensure future lettings and ongoing management of the development maintain a safe, secure and positive environment for people to live in.

5. To develop and adopt a Preventing Evictions protocol between BCC and Caridon.

This Lettings Plan is designed to afford the best possible chance of creating and maintaining a stable and safe community whilst meeting housing need in the area. The existence of the Lettings Plan may mean that vacancies will not always be allocated to the applicant who can demonstrate the greatest housing needs. Applicants with a lower priority and/or less of a housing need may be considered for any vacancy, if in doing so will help to maintain a stable community.

The Scheme

Imperial Apartments is a re-development of the former office accommodation at Parkview Campus into 465 units of studio, one and two bedroom residential accommodation. The building and accommodation is set over four floors. There are four landscaped courtyard gardens and there will be a range of indoor and outdoor communal spaces and facilities for residents to use**. There are 450 car parking spaces available and indoor secure bicycle storage providing lock up spaces for over 700 bicycles. All properties on the development are flats.

The development is to be delivered in two phases, with phase one being almost at completion and ready to let at the time of this plan being written.

**Summary of units:**

<table>
<thead>
<tr>
<th></th>
<th>PHASE ONE</th>
<th>PHASE TWO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studios</td>
<td>149</td>
<td>Studios</td>
</tr>
<tr>
<td>One bedroom</td>
<td>11</td>
<td>One bedroom</td>
</tr>
<tr>
<td>Two bedroom</td>
<td>106</td>
<td>Two bedroom</td>
</tr>
<tr>
<td>Total</td>
<td>266</td>
<td>Total</td>
</tr>
</tbody>
</table>

BCC will be responsible for providing nominations to 216 of phase one. This will be all of the studio and one bedroom flats and 56 of the two bedroom flats.

The remaining 50 units of two bedroom accommodation in phase one will be let by Caridon Group directly and will be let in conjunction with the joint overall aim of creating a sustainable community at Imperial Apartments.

Phase two will be delivered in the early months of 2021 (expected to be ready January/February at the time of this Plan being written). BCC intend to provide nominations to 50 of these 199 properties, with Caridon Group lettings the remaining 149 themselves. Whilst this Lettings Plan solely addresses the delivery of phase one lettings, it will be reviewed prior to and in context to lettings commencing in phase two, in order to ensure that the overall aims and objective for creating and maintaining a stable community at Imperial Apartments continues to be met.
Local Area and Transport

Imperial Apartments is located on Whitchurch Lane, which sits on the border between Hartcliffe and Hengrove in South Bristol. Nearby local amenities include; Hengrove Leisure Centre, Hengrove Play Park, City of Bristol College – South Bristol Skills Academy, Imperial Retail Park, Hengrove Mounds Nature Reserve, Bottle Yard Studios, South Bristol Community Hospital, Cineworld and Hartcliffe Community Park Farm.

There is a M1 Metro bus stop located outside the entrance to Imperial Apartments. Buses are scheduled every 10 minutes and take 40 minutes to reach Bristol city centre. The bus route runs via Parson Street Train Station, Bedminster, Broadmead, UWE and Cribbs Causeway. Cycling to the city centre and Bristol Temple Meads train station takes 25 minutes, while driving takes 15-20 minutes. There are 6 major supermarket outlets located 10-20 minutes walking distance, including; Aldi, Lidl, Morrisons, Asda and Iceland. In addition, there is a cycle path link from Imperial Apartments to William Jessop Way.

Lettings

In order to achieve and maintain a stable community, nominations will be sought to try and maintain a good mix for the community taking the following into account:

- Nominations will be sought from a variety of routes, and there will be a strong focus on a percentage of letting to those who already live or have family or friendship networks in the local area.
- Tenants will have minimal ongoing support needs (BCC will not be placing anyone with high and multiple and overlapping support needs into a letting at Imperial Apartments).
- Household size, age and makeup.
- Economic status (we will aim for a percentage of lets at the scheme to be to people already in employment and seek to provide support on site through partner agencies for those seeking to go into employment).

Guidance has been sought from the BCC Private Housing Team in regards to the maximum occupancy level of the flat due the in the context of size and space standards.

In general studio and one bedroom units in the scheme are largely only suitable for one or two person occupancy depending on the total square metre of the flat. The two bedroom flats have a maximum occupancy of 3 persons (including a child), with some of the smaller flats being deemed fit only for a two person occupancy (i.e. a single person and a child).

Due to the size of two bed units we suggest in general that no child over 5 years old moves in.

BCC will be working closely with Caridon in regards to the source and household makeup of the 50 units they will be directly letting to the private market in order to ensure Caridon adhere to...
occupancy recommendation and that none of those lettings compromise the collective ambition to achieve and maintain a mixed and stable community.

A robust nominations and lettings process will be agreed with Caridon to ensure a fair and consistent process and limit either party’s immediate or future risk against liabilities such as void loss and bad debt.

Referral Routes

We expect BCC Tenants for Imperial Apartments to come from the following main sources:

- Move on from a range of emergency and temporary accommodation.
- Direct Nomination for new people approaching the council for assistance with their homelessness and housing need. These people must be eligible for assistance under the homelessness legislation.
- Individuals and families registered on Bristol Housing Register who have expressed interest for available accommodation promoted on Homechoice.

Prospective tenants for Parkview will be nominated for a specific property via a referral from Housing Options or from interest expressed as a result of Imperial Apartments being promoted on citizen log in page for Homechoice Bristol.

In line with the overall ambition to create a diverse and sustainable community we will be targeting a certain number of lets from each nomination and referral source.

The table below gives a snapshot of the number of lets we expect to do by referral route and source.

<table>
<thead>
<tr>
<th>UNIT SIZE</th>
<th>TOTAL UNITS</th>
<th>HCB Promotion</th>
<th>PRT MATCH</th>
<th>Direct Letting</th>
<th>PMOS DIRECT</th>
</tr>
</thead>
<tbody>
<tr>
<td>STUDIO</td>
<td>149 of which</td>
<td>30</td>
<td>100</td>
<td>Nil</td>
<td>19</td>
</tr>
<tr>
<td>ONE BED</td>
<td>11 of which</td>
<td>NIL</td>
<td>NIL</td>
<td>11</td>
<td>NIL</td>
</tr>
<tr>
<td>TWO BED</td>
<td>56 of which</td>
<td>26</td>
<td>10</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>TOTAL</td>
<td>216</td>
<td>56</td>
<td>110</td>
<td>21</td>
<td>29</td>
</tr>
</tbody>
</table>

Marketing and Promotion

Marketing and promotion of Imperial Apartments will differ depending on the source we are intending to attract prospective tenants from and will include:

- Appropriate promotional and informational material being produced and circulated to all relevant housing options staff and partner services.
- Client leaflets about the scheme being available in all services where Imperial Apartments is a move on option for those clients residing there.
- Presentations about the scheme at relevant staff, service and residents meetings.
• Possibility of one or more open days on site hosted by Caridon.
• Direct promotion to citizens on Homechoice Bristol.

A more detailed marketing and communications plan for the sourcing of tenants for the scheme, will be produced, and sit alongside, this Lettings Plan.

**Tenancy Type**

Lettings at Imperial Apartments will all be private rented sector lettings and as such tenancy agreements will be Assured Shorthold. As it is a Nominations Agreement the council are entering into with Caridon, it is Caridon who are the landlord of any tenancy and as such it will be Caridon’s tenancy agreement which will be used for the letting. This agreement will be reviewed, adapted where necessary and approved by BCC as fit for purpose.

Those who are offered one of the 216 flats available to let via BCC will be granted an initial 12 months fixed term tenancy. At the end of this term the tenancy will either be allowed to roll onto a statutory periodic tenancy or by direct agreement between the tenant and Caridon, another fixed term may be entered into.

The 50 two bedrooms lets being done directly by Caridon will also be Assured Shorthold, however it will be at the discretion of Caridon as to whether they grant initial terms of 6 or 12 months.

**Tenancy Sustainment**

It is paramount, particularly for those tenants that have come via a homelessness referral route and/or who have a low household income, that attention is paid to assuring people are able to sustain tenancies and do not face significant hardship or challenges that may put their tenancy at risk of failure. Imperial Apartments Lettings and Delivery Plans will have three key areas of focus in relation to tenancy sustainment:

**Suitability** – We will ensure that all lettings meet the suitability needs of the household with particular attention to household size and any support needs. Imperial Apartments will only be offered to those who we are confident are able to live independently with or without an element of resettlement or floating support.

**Affordability** – Only people who we are confident are able to meet the costs of rent, household bills and general priority living costs will be nominated for a property at Imperial Apartments. For those coming through a homelessness referral route an income and expenditure exercise will be undertaken with the client, based on predicted living costs once living at Imperial Apartments, to assess and ensure affordability. Rents for all BCC Nominated Lettings will be set at Local Housing Allowance rates.

**Support** – We will ensure that any person entering a BCC Nominated letting at Imperial Apartments who needs some form of resettlement or ongoing floating support will have this available to them for the period of time that they require it. In collaboration with Caridon and other partner agencies,
we will also ensure that suitable support is available for a person who may start to struggle at a later time during their tenancy.

Exclusions and Rejections

Imperial apartments will not be used to house anyone who:

- Who has high, multiple and overlapping support needs.
- Is deemed too high risk to the property or others living at the scheme.
- Is not able to afford the property available to them.
- Is not eligible for assistance under the homelessness legislation.

Because all nominated tenants will have been pre-assessed and deemed suitable for a tenancy at Imperial Apartments, we are not expecting a high number of rejections from Caridon. However, we are mindful that ultimately Caridon are the landlord of the properties and, as the ones legally entering into the tenancy agreement with tenants, will have final say on whether they proceed to tenancy or not. This is a risk to BCC particularly in relation to void loss liabilities for any unlet units.

To mitigate this risk, there will be robust and mutually agreed terms in the Nominations contract, and all relevant written processes, which make it clear under what circumstance Caridon might have a right to reject or delay a nomination pending more information.

If a circumstance occurs where it is BCC that deems an individual or household that would like to be nominated for accommodation at Imperial Apartments an unsuitable nomination, then there will be a fair Right to Appeal process in place.

Preventing Evictions

There will be a collaborative aim to prevent unnecessary evictions from the site which result in a return to homelessness for any individual or family that live on site following a BCC nomination. This will be achieved through a variety of means including:

- Developing a Preventing Evictions protocol.
- Implementing robust and fair policies and procedures, particularly relating to rent arrears management.
- Effecting regular communication and meetings between Caridon, BCC (in particular the Homelessness Prevention Team) and its partner services that are supporting and managing tenants on site.
- Ensuring that there are the resources available to source and link tenants into appropriate support services that will enable tenancy sustainment and rescue.
- Using existing BCC services, e.g. Welfare Rights and Money Service (WRAMAS), to assist and intervene where needed.
- Collaborating and working in partnership with advice and support agencies across Bristol.
Ongoing Management and Continuous Improvement

Overall management of the scheme is predominately the responsibility of Caridon. However it is in the best interests of all stakeholders including BCC, Caridon and Imperial Apartment residents, as well as the local community, that there is a collaborative and proactive approach to ensuring the scheme is managed effectively. This is so Imperial Apartments continues to be a positive place where people want to live and continues to meet the housing needs of citizens of Bristol.

There are number of ways in which we will achieve this including, but not limited to:

- Setting up an Imperial Apartments Operational Management Group. This group will meet regularly and include key staff members and representatives of partners and services engaged in the site.
- Setting up a BCC Management Board or a Project Manager employed to maintain oversight of delivery of the scheme; ensuring its success and holding overall responsibility for working with Caridon and any relevant other stakeholder in resolving management issues.
- Ongoing community development and integration work.
- Delivering a planned capital investment programme (Caridon led, with BCC support) to improve the scheme facilities and environment.
- Ongoing engagement with services and agencies such as; BCC Community Development Team, Avon and Somerset Police and Public Health.
- Regular review of the housing needs of the people who are homeless in Bristol to ensure the scheme and accommodation available at Imperial Apartments is still relevant for, and contributing to meeting that demand.

Future Lets

The main intensive letting period at Imperial Apartments will be between the start of September and the end of October 2020. However, as BCC will have a fixed contracted period of three years to nominate new prospective tenants for any of its allotted 216 flats as they come up for re-let, it is of paramount importance that we have plans in place for future lets and how this will be managed. This includes considering resource implications, ongoing tenant demand and referral sources and processes.

Any nomination for a BCC re-let must also keep balance of the tenant mix and maintaining a stable community in mind.

We will ensure that there are robust procedures in place for the management of voids and re-lets from the conception of delivery of the scheme. These will include how it is to be decided where the new tenant for the property is sourced from and clear target timescales in which nominations for re-let must take place.
Resident Engagement and Community Integration

Key to ensuring that Imperial Apartments provides a positive environment for people to be and a place that people aspire to live in, is making sure that residents are as involved as possible in how the scheme is managed and what facilities are on the developed site. Alongside Caridon, we will ensure that there are a range of suitable means for residents to feedback any issues encountered, including regular drop-in surgeries, residents meetings and surveys.

Working alongside our BCC’s Community Development Team, local services and community organisations, we will also strive to fully integrate Imperial Apartments into the local area and community and make it a place where local organisations can come and use space to offer a variety of services that will benefit residents living there.

Equalities

This Lettings Plan will comply with the Equalities Act (2010). It will ensure that the assessment and nomination process does not discriminate against households and enables applicants with diverse needs to access accommodation on this scheme. An Equalities Impact Assessment will be undertaken and reviewed at periodic points during the contract term.

Data Sharing and Consent

BCC will require applicants to consent to sharing their information with Caridon and other select relevant partner agencies as part of their nomination for a letting at Imperial Apartments. Contact to request appropriate information from agencies such as social services, support workers or probation officers may also be necessary. Policy and process around Data Protection and information sharing will be covered in a separate document and BCC will ensure that any such policy and processes within meet the requirements of The Data Protection Act 2018 alongside GDPR.

Review

This Lettings Plan will be in place for the entire period of the contract term with Caridon and will be periodically reviewed every 12 months to ensure we are sustaining the community at Imperial Apartments and meeting the objectives of the plan.

* The Nominations Contract will be for five years but with a three year break clause.

** Not all intended facilities as advertised by Caridon will be in place when lettings of units commence as form part of a capital investment programme to be delivered over the coming 6-12 months.