

| Council name               | COTSWOLD DISTRICT COUNCIL   |
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| Name and date of Committee | CABINET - 8 FEBRUARY 2021   |
| Report Number              | AGENDA ITEM 10  |
| Subject                    | AFFORDABLE HOUSING DELIVERY   |
| Wards affected             | All   |
| Accountable member         | Cllr Lisa Spivey Cabinet Member Affordable Housing and<br>Homelessness<br>Tel: 01285 623000 Email: lisa.spivey@cotswold.gov.uk  |
| Accountable officer        | Claire Locke, Group Manager - Commissioning<br>Tel: 01285 623427 Email: claire.locke@publicagroup.uk  |
| Summary/Purpose            | To set out the delivery strategy for the Council to accelerate provision of social rented and affordable homes for local people.  |
| Annexes                    | Annex A - Affordable Housing Delivery Strategy and Action Plan<br>Annex B - Targets and performance<br>Annex C - Gloucestershire Local Housing Needs Assessment<br>(September 2020)<br>Annex D - Housing Delivery Option Appraisal<br>Annex E - Legal advice (Exempt)<br>Annex F - Kemble   |
| Recommendation(s)          | That Cabinet:<br>(a) Adopts the Delivery Strategy and Action Plan in Annex A.   |
|                            | (b) Agrees that in order to facilitate longer term innovative delivery,<br>the Council obtains specialist advice on establishing a formal delivery<br>partnership with a Registered Provider and that up to £15,000 is<br>allocated for this work from Council Priorities Fund allocation to<br>support the Recovery Investment Strategy and that,  |
|                            | (c) subject to satisfactory advice received under (b) that delegated<br>authority is granted to the Chief Executive in consultation with the<br>Deputy Leader and Cabinet Member for Finance, the Cabinet<br>Member with responsibility for Housing and Homelessness, the s151<br>Officer, the Monitoring Officer and Head of Legal to progress the<br>procurement of a suitable partnership with a Registered Provider and |

|                             | <ul> <li>specialist Carbon consultant to bring forward exemplar schemes and test opportunities to deliver carbon zero social rented homes, which are financially sustainable for providers/developers and agree final terms of this agreement.</li> <li>(d) Agrees that officers should review and provide detailed prioritisation of Council owned sites to enable further reports to be browned for any for</li></ul> |
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|                             | brought forward for decision on:<br>i) Council owned sites suitable for development in line with the<br>Affordable Housing Delivery Strategy through partnership<br>delivery set out in (b & c) above, and,   |
|                             | ii) Council owned sites suitable for disposal as open market<br>sites or self build plots (as appropriate), with capital receipts<br>earmarked for reinvestment in affordable housing delivery  |
|                             | (e) that the preferred route to delivering housing at Station Road<br>Kemble is in partnership with a Registered Provider for the purpose<br>of affordable housing and that;  |
|                             | (i) Officers procure a Registered Provider to prepare a planning application, develop a detailed business case for the delivery of affordable, carbon zero homes on the Council's land and that,  |
|                             | (ii) a report be brought to Cabinet/ Council as necessary with the final business case and terms for any disposal for decision.   |
| Corporate priorities        | Providing good quality social rented homes.<br>Responding to the challenges presented by the climate crisis.  |
| Key Decision                | Yes   |
| Exempt                      | No  |
| Consultees/<br>Consultation | Specialist Officers   |

# 1. BACKGROUND

- 1.1 In 2019, the Council identified the delivery of good quality social rented homes as a key focus in delivering its Corporate Plan. Social rented housing is that which is owned by Local Authorities or Registered Providers and is provided at a rent which is lower than Affordable rent (Full definitions are provided in the 'Definition of Terms' section of the Affordable Housing Delivery Strategy in Annex A). The Corporate Plan sets out a number of actions against this.
- 1.2 With high house prices across Cotswold District, market rents are unaffordable for many and there is a shortage of good quality rented accommodation that is genuinely affordable. Affordable housing helps meet this housing need and can include low cost home ownership or rented accommodation which typically has a discount of around 20% on the market rent, however this may still not be truly affordable for some residents. Social rented homes have a rent that is lower than affordable rent and therefore provides homes for those on lower incomes or in receipt of full Housing Benefit. The Council already has targets and a programme to deliver affordable housing, although this is through facilitation rather than any form of direct provision.
- 1.3 The Council aims to deliver additional social rented and affordable housing which would not be brought forward without the Council's intervention, and needs to identify a clear strategy for doing this against which potential schemes can be evaluated.
- 1.4 There are several delivery models the Council can consider and decisions are needed based on the likely timescales, costs, benefits and outcomes that these models will deliver. The Council will need to define clear actions and time frames to deliver its housing priority and this report seeks to address some of these options to agree the way forward.
- 1.4 The Council has duties to provide accommodation for homeless people in certain circumstances and has one property that it owns at Ashcroft Road, another that provides accommodation via Bromford Housing Association in Victoria Road, Cirencester and a recent lease for a property providing 9 self contained units in Tetbury which was completed in September 2020 following agreement by Council in July 2020. Where demand exceeds this provision the Council relies on bed and breakfast and hotel accommodation for emergency provision. Financial appraisals have shown that provision using the commercial sector is comparatively expensive and direct provision through council owned accommodation or leased accommodation is likely to be a more affordable option and provide a better quality of accommodation and network of support.
- 1.5 Whilst the provision of additional units in Tetbury has delivered against the immediate emergency homelessness requirement there remains a lack of properties for those who no longer meet the short term emergency need but are not in a position to obtain longer term affordable accommodation. Individuals and families in this situation often require a period in supported accommodation in order to meet their short term housing need and provide the necessary support to enable them to fulfil the criteria for taking on standard housing association units. This may, for example, be as a result of previous anti-social behaviour or non-payment of rent.
- 1.7 This affordable housing delivery strategy therefore includes homeless provision for both emergency homeless accommodation and supported short term accommodation as a stepping stone to obtaining longer term affordable housing.

## 2. MAIN POINTS

- 2.1 There are significant challenges involved in delivering affordable homes, historically when development was strong, affordable homes were relatively easy to bring forward, however constraints on developable land, high local land values, the related site viability and the national economy (which has been severely adversely affected by the Covid-19 pandemic) has impacted the local housing development market with limited schemes coming forward and many that are in the pipeline being paused or delayed. The current focus is on facilitating affordable housing identified within the Local Plan and through rural exception sites and community-led housing opportunities. This includes working with various partners including Housing Associations to maximise delivery of affordable housing to meet local needs which are identified in the Gloucestershire Local Housing Needs Assessment 2020 (Annex C) and in Parish Housing Needs surveys at a more granular level. This is monitored as part of this process and this essential work will continue but the Council wishes to go beyond this negotiated and facilitated delivery and bring forward additional affordable homes through enabling and direct intervention which may include provision of land and other funding to try and address the unmet affordable housing need.
- 2.2 In order to deliver against its Housing priority the Council is increasing the extent of its partnerships with Registered Providers to deliver additional social rented housing and actively encouraging carbon neutral or low carbon homes for people on low incomes. This is currently through negotiation but the council will also spearhead this through its additional delivery and through the development of the Carbon Toolkit which will help developers identify design changes and technology that will achieve carbon reduction in housing developments. However further work is needed to embed carbon reduction requirements within a development policy framework through the updated Local Plan.
- 2.3 In addition to working with local housing associations to deliver rural exception sites, the Council is working to promote innovative alternative methods of providing rural affordable housing such as encouraging community-led housing approaches. This includes working with Community Land Trusts through the Council's Community-Led Housing Enablers and identifying opportunities for the Council to directly deliver rural housing, including through the use of its own land.
- 2.4 Rural Exception Site housing schemes are brought forward on the basis of identified local housing need. By definition, they are exceptions to the Local Plan policy of delivering housing within the District's 17 principal settlements. In the past, Parish Needs Surveys were generally only carried out upon request by a parish, which led to few opportunities. Since May 2019, the Council is now proactively identifying parishes for new housing needs surveys based on:
  - Land opportunity where potential affordable land opportunities are identified e.g. publicly owned land. The availability of land at affordable values is a particular barrier to bringing forward affordable housing schemes;
  - Perceived need based on housing register data identifying locally connected people waiting for housing in particular parishes, particularly where there is a shortage or lack of a particular size of housing e.g. 1 beds to meet that need; and,
  - Local interest where individuals, local community groups or parish councils have expressed an interest in bringing forward affordable housing schemes.

- 2.5 Development of a rural exception site would require a Parish Needs Survey to support the planning application and ensure transparency, particularly as the Council will be the Planning Applicant or working in partnership with the applicant.
- 2.6 In addition the Council can bring forward Exception sites that fall within settlement boundaries and are not therefore rural in nature. These are often smaller infill plots between other developments.
- 2.7 The Council has conducted a desktop assessment of council-owned land in the District and has identified sites which may be suitable for housing. A transparent system of prioritising sites for development needs to be agreed, however considerations will include site size and therefore potential development opportunities, planning policy, local Housing Needs and site constraints (access, neighbouring development, topology, ecology, flood risk etc.). Once site viability has been further explored, sites will be brought forward to Members for agreement to the general principle of development before detailed work is carried out with partners and local communities and planning permission is sought.

### Affordable Housing Delivery Strategy

- 2.8 To ensure that the Council achieves its affordable housing priority, an Affordable Housing Delivery Strategy should be adopted which clearly sets out the Council's objectives and the key criteria that need to be met for a scheme to be brought forward.
- 2.9 The Council understands that it is the whole cost of living in a property that is important to ensuring true affordability for local people. Housing may be defined as affordable but this does not necessarily mean people can afford to live there, particularly where local market housing costs are as high as they are in Cotswold District. In January 2020 the Council agreed, in the context of its Climate Change emergency commitment, that any development it acquires or builds must be carbon zero. This will increase construction costs of affordable housing but reduce ongoing revenue costs for tenants, which will be beneficial in reducing fuel poverty. Consideration should therefore be given to the combined costs of rent and utilities and this will need to be defined and quantified within the Strategy.
- 2.10 The draft strategy and action plan are attached at Annex A. These documents will remain live and will continually evolve as the Council advances its work in this field.

#### **Delivery Model Options**

- 2.11 There are a number of options available to the council; to directly deliver, work in partnership or enable the development and ongoing management of social rented and affordable homes in the district. The delivery model should achieve against the following:
  - Maximise delivery against the Council's priorities, notably delivering social rented homes and reducing carbon emissions.
  - Ensure long term provision of homes for local people on low incomes, with housing that can be adapted to meet changing housing needs in future years.
  - Enable swift delivery of Council priorities.
  - Provide a financially sustainable solution.

- 2.12 If the Council provides a tenancy for permanent accommodation it becomes a secure tenancy which means the tenant can stay there indefinitely, with limited exceptions, and acquires a 'Right to Buy'. This would mean the principles above would not be achieved. The opportunities to develop an in-house delivery company or to partner with a Housing Association in a Joint venture or other form of partnership require legal and financial due diligence to ensure the Council makes the right decision in support of its medium to long term delivery.
- 2.13 In November 2019 the Council commissioned consultants 'Local Partnerships' to undertake a Member scoping workshop to consider Housing Delivery Models. The resulting summary report suggests partnering with a Registered Provider would be a suitable delivery route based primarily on the Council's lack of capacity and the time and cost involved in building a team with the relevant depth and breadth of skills, however further work would be required to fully explore options. The report also references the skills within Bromford Housing Association and the possibility of aligning ambitions and delivering in partnership. However a sound comparison of options is required to enable the Council to take an informed decision on the medium to long term delivery model.
- 2.14 In any delivery model it is important that the Council understands and sets out the legal constraints around ownership, tenancies and Housing Revenue as set out in the Housing Acts. This will affect the actions of, and implications for the Council.
- 2.15 The Council has considered the following delivery options:
  - Direct delivery by the Council,
    - With the Council retaining the units for lease direct or,
    - Leasing the completed units on a long lease to an arms length third party
    - Forming a Housing company for delivery
  - Community delivery
    - Through new or established Community Land Trust (CLTs), or similar vehicles
    - Identifying land to facilitate self build
  - Partnership delivery
    - Through a Joint Venture or other long term partnership arrangement
    - Piecemeal, site by site partnership
  - Transfer of land to enable delivery with appropriate legal restrictions or requirements on transactions to ensure delivery
- 2.16 Annex D provides high level principles for each option. Once the preferred option is agreed, further detail and due diligence will need to be progressed as set out in 'Next Steps' below.

#### Next Steps

2.17 Officers recommend that based on the outcomes from the previous Member workshop, discussion with local Registered Providers, and a review of options, the Council moves to establish a formal partnership with one lead Registered Provider and to facilitate this commissions specialist advice on the best model for this partnership taking into account legal, financial and governance issues and that on conclusion of this work the Council commences procurement to enter into the most suitable form of partnership. This work will also provide advice on establishment of other partnerships where there are specific needs for different arrangements.

### 2.18 There will be three delivery routes employed, if this is agreed:

#### 1. Accelerated delivery - short term

Procure Housing Association/Registered Provider/s to deliver Kemble as the top priority for the Council, and to also potentially repurpose other Council owned buildings such as the Cotswold Club, <u>and</u>;

### 2. Medium Term

Assess best delivery mechanism for a partnership delivery model such as Joint Venture Use this route to deliver a number of schemes, including schemes on land currently owned by the Council such as Rural Exception Sites, repurposing other existing properties <u>and</u>;

#### 3. Local solution

Work with individual local Housing Associations on sites that may not meet the objectives of the partnership delivery model to deliver ad hoc small schemes (i.e. one or two units only or those next to another Housing Association's existing properties.

Once a decision is made to proceed the Council will prepare a project plan for the delivery of the Kemble scheme, this will be high level initially but once a Housing Association partner is appointed further detail on delivery milestones will be mapped out.

#### SITES FOR DECISION

### 2.19 Non - Council sites presenting options to deliver Social Housing Priority

The Council will continue to facilitate additional social rented or affordable homes through negotiation or investment, these include:

#### 2.20 Davies Road, Moreton-in-Marsh

This site is owned by Central Government and a planning application for outline permission for 15 homes (ref: 19/04749/OUT) has been submitted. This development will be the subject of a separate report to Cabinet for recommendation to Council in the next few months.

#### 2.21 Parcel of land at Sunground, Avening, GL8 8NW

2.21.1 This agricultural site is owned by Gloucestershire Rural Housing Association and has planning permission which was granted in November 2020, for 14 homes, comprising 9 affordable homes and 5 affordable ownership dwellings (ref: 19/04221/FUL). This development would provide 3 x 2 bedroom and 6 x 1 bedroom affordable homes and 4 x 2 bedroom and 1 x 3 bedroom shared ownership homes. Details of the proposed development can be found on the Planning portal.

Grant funding is required to deliver this affordable housing site, so it is anticipated that a report will be brought forward to seek funding to ensure the entire development delivers 100% affordable housing.

### 2.22 Council owned sites

The Council owns a number of buildings and land assets which could be repurposed for affordable housing. High level feasibility is therefore being explored and interest from delivery partners sought. Once any schemes which may be viable have been identified they will be the subject of separate reports to Cabinet/Council or progress under land and property delegations as appropriate.

### 2.23 Land at Station Road, Kemble

- 2.23.1 In September 2020 Cabinet agreed (Minute CAB.26 refers) to proceed with a development at Station Road, Kemble on Council owned land to deliver 8 affordable homes. Annex F provides further detail on options available to deliver this site.
- 2.23.2 In order to progress this project a decision needs to be made on the appropriate delivery model in line with the Affordable Housing Delivery Strategy at Annex A.
- 2.23.3 As set out in the delivery options in Annex D the Council could deliver this scheme directly but there would be a considerable time lag and cost in bringing in the expertise to do this. A Housing Association with the capacity, experience and skills to do this could take the scheme forward from this point, preparing a planning application and constructing the homes. Whilst the Council will explore a formal partnership for its medium to long term housing delivery, it is proposed that the Council seeks to deliver this scheme via a legal agreement and/or land transaction with a Housing Association as this is considered the most expedient way to deliver affordable housing on this site, whilst delivering against the objectives in 2.11 above, with the ability for the Housing Association to obtain grant funding where available.
- 2.23.4 The Council has produced a brief and is inviting expressions of interest from Housing Associations to take this forward. On completion of this process it is recommended that the Council transfer the land, whether by freehold sale or long lease interest to the successful Housing Association to enable the affordable housing scheme to progress swiftly.
- 2.23.5 The objective of this transaction will be the delivery of social rented affordable homes. In order to achieve the Council's objectives there may be a need for the Council to subsidise delivery. It is deemed unlikely that the development will provide an opportunity to generate income or capital receipts. In order to achieve carbon zero affordable homes it is likely the Council will need to dispose of the site for £1 and may need to provide additional funding to ensure the homes are carbon zero. Any additional funding would be the subject of a future report once the scheme has been designed and fully costed and business cases developed on the tenure mix etc.
- 2.23.6 Officers would work with the preferred partner to develop a business case and engage specialist carbon designers. The Council can procure a partner to develop this one off site as this would fall within the limits for EU procurement legislation subject to the impact of Brexit.
- 2.23.7 The Cabinet report presented in September 2020 required business cases to be presented back for agreement on the way forward. This report now sets out specific delivery options that can be taken forward, however any potential disposal of this site (in line with the

recommended transfer to a Housing Association) will require clarity on the full range of development or disposal options and the best financial value which could be obtained for the site. In line with legislation, and due to the unrestricted value of the site, Council approval will be required for any long term disposal option of either a freehold sale or long lease interest.

- 2.23.8 Options for disposal of the site are therefore set out at Annex F to provide the necessary information to allow Cabinet to take a decision on the preferred route set out in the recommendations. A detailed business case on a partnership delivery route will be prepared and presented to Council for final approval in due course.
- 2.23.9 The whole site within the Council's ownership, community gardens area and housing allocation, has recently been listed as an Asset of Community Value. This will mean that the Council, as owner, will have certain obligations should it wish to dispose of the land to allow the community time to put forward a bid for the site; the overall period, should community interest be shown, is 6 months. The Council can then sell to whomever it determines is the best purchaser. The Listing of the site will be a material consideration in determining any planning application for the site, however this will be considered alongside all issues and other material considerations. Part of the site remains allocated within the recently adopted Local Plan for housing.
- 2.24 **The Cotswold Club** Further to Cabinet reports and decisions at its meeting on 7th September 2020 Officers have carried out a review of the site to consider various options. These options include the potential use for service delivery with regard to homelessness accommodation and other housing options. Interest has been shown by partners in potential development of the site to meet needs under the Affordable Housing Delivery Strategy. Further work will be carried out in consultation with partners to identify whether this would meet the needs for housing delivery or is surplus to the Council's requirement. A further report will be brought back to Cabinet for decision on this site.

#### 2.25 Review of sites

- 2.25.1 The Council owns some small parcels of land which could be brought forward as rural exception sites or exception sites for affordable housing development, sold as self build or market housing. It also owns sites which are currently allocated within the Local Plan.
- 2.25.2 Rural Exception Sites are small sites used for affordable housing in perpetuity which would not normally be used for housing. The Local Plan states that Rural Exception Schemes will be encouraged where: a proven need for Affordable Housing can be identified; where no agreed means of achieving required affordable housing can be found within the local area; and where no sites are allocated within the Local Plan or relevant Neighbourhood Plans. Applicants in housing need with a defined local connection are given priority in the affordable housing allocation process.
- 2.25.3 The sites held by the Council vary in size and have been reviewed in light of their potential to deliver social or affordable housing and the constraints on or around the site. The larger sites will be more financially viable but there will need to be further consideration of their potential suitability for development in consultation with Planning and on assessment of Local Housing needs and any site specific constraints.

- 2.25.4 Some of these sites are currently in community use and not all may be supported by the local community, which may mean there is strong opposition when planning permission is sought. If the Council wishes to pursue these sites, regard should be had to the likely level of support at a local level and a decision taken to support the development in principle subject to planning permission being granted. This will ensure that the Council does not incur costs and then withdraw its proposals if they are not supported locally.
- 2.25.5 This review has identified a number of sites that are considered market sites and could be sold simply as a market site or specifically as a self build plot. These sites are all small and due to their location, access or onsite constraints are unlikely to be suitable or financially viable for development as social or affordable housing. Retention of these sites means the Council retains liability for their management and maintenance but they provide no benefits.
- 2.25.6 The potential disposal of some of these sites will be the subject of a future report to Cabinet.
- 2.25.7 The Council has targets for provision of self build plots and it is felt these sites could contribute towards this.

### Enabled delivery of new or improved affordable homes

- 2.25.8 The Council is working positively with land owners, Registered Providers and other groups to bring forward the delivery of additional affordable homes and to improve the quality of existing stock. This work includes:
  - Supporting Neighbourhood Planning Groups to deliver their Neighbourhood Plans and the provision of more affordable housing. The emerging Fairford Neighbourhood Plan proposes to allocate a site for 80 dwellings, which would yield 32 affordable homes. The delivery of additional affordable housing is also a primary focus of the emerging Stow and Swell Neighbourhood Plan.
  - The Dunstall Farm site in Moreton-in-Marsh was allocated for 119 dwellings in the Local Plan and was previously expected to yield 47 affordable homes. The Council supported an opportunity to increase the density of development on this site and agreed to approve an application for 250 dwellings, including 100 affordable homes, on 11 November 2020 (ref: 19/02248/FUL). This will provide 53 additional affordable homes.
  - The Council is working with Bromford and has been supportive of their proposals to improve the quality of affordable housing stock. Notable schemes include 44 upgraded homes at Leaholme Court, Cirencester; 36 rebuilt homes at Patterson Road, Cirencester; and 26 homes at Cross Tree Crescent and Oakley Flats in Kempsford plus 1 additional home provided. Bromford is also bringing forward two further schemes that would rebuild a further 34 further homes and create 12 additional affordable homes (details not yet publicly available).
  - There are also opportunities for affordable homes that are subject to planning applications. Kemble, Windmill Road 6 affordable homes (ref: 20/00833/FUL); and Tetbury, Quercus Road 30 affordable homes (ref: 19/04223/FUL). Discussions

have also been had with developers about further applications that may be submitted soon.

- Chipping Campden, Berrington Road 4 additional Social rented homes developed with grant funding from the Council.
- Moreton-in-Marsh, Fire Service College 3 market homes acquired from the developer by a Registered Provider for use as affordable housing and further provision in negotiation.
- Chipping Campden, Aston Road 30 affordable homes (ref: 18/04768/OUT).

## 3. FINANCIAL IMPLICATIONS

- 3.1 The Community Homes Fund, specifically aimed at community-led housing, ended on 31<sup>st</sup> March 2020. The Council is waiting for an announcement from Central Government on whether that fund, key to future delivery, will continue.
- 3.2 The Council is able to support development projects financially using its existing community-led housing grant and commuted sums generated from off-site contributions for affordable housing from previously delivered sites. The funds are available to help community groups and Registered Providers deliver affordable housing across the district. Homes England may also match fund significant investment in the delivery of affordable housing through their general Affordable Homes Programme.
- 3.3 The Council's draft Medium Term Financial Strategy includes £54 million for investment in its Recovery Investment Strategy. The Strategy includes "Investment in social rented housing with a secondary aim of providing a return to the Council". This funding would be borrowed and therefore any business case for social housing schemes needs to include the cost of borrowing and should adhere to the aims of the Recovery Investment Strategy.
- 3.4 This report seeks agreement to proceed with a Housing Association to deliver the Housing Scheme at Station Road, Kemble. This would be a land transaction to dispose of the site. Any additional capital costs associated with delivering the scheme and specifically in funding Carbon Zero homes will be the subject of a future report.

## 4. LEGAL IMPLICATIONS

- 4.1 There are a variety of legal implications arising from the actions set out in this report and which will be considered at the appropriate juncture.
- 4.2 Full due diligence of the preferred medium term option will be progressed following this decision.
- 4.3 The release of any Council land to a Housing Association would be the subject of a legal agreement ensuring the Council's housing objectives are achieved through the land transfer.
- 4.2 Similarly any funding granted for the delivery of social or affordable housing will be provided subject to appropriate terms being adhered to with regard to onward housing provision and zero carbon housing standards.

## 5. RISK ASSESSMENT

- 5.1 There is a risk that high level costs set out in this report are subject to change due to factors such as market forces or unforeseen costs.
- 5.2 Schemes may not proceed if planning permission is not granted, full funding requirements cannot be met or other factors constrain development.
- 5.3 The Council is seeking to deliver against its social rented homes and climate emergency priorities, however it may not be possible in all cases to establish a viable business case to deliver social rented homes that are zero or low carbon or doing so may reduce the overall number of homes delivered.
- 5.3 The Council can directly deliver housing and this option will form part of the Council's medium to long term delivery strategy. As the Council wishes to ensure any social and affordable housing provided remains available for rent to local people it must transfer housing to a Housing Association (Registered Provider) or a Housing Company. Should the Council retain the housing directly then any tenancies granted will be secure tenancies and, based on the law at present Right to Buy will apply. However, this is subject to a cost floor which takes into account development costs when considering the amount of t discount which will apply for 15 years if developed by the authority. There is a risk that this stock is lost from the rental market, but the cost floor mitigates this risk for the first 15 years.
- 5.5 Risk that future legislation brings in any property with a Council interest, even if not direct, resulting in secure tenancies.

## 6. EQUALITIES IMPACT (IF REQUIRED)

6.1 An Equalities Impact Assessment has been carried out. This highlights that the delivery of housing is aimed at meeting the identified needs of local people, based principally on the Local Housing Needs Assessment. Housing provision will be tailored to meet these specific needs and have regard to demographics such as age, income and disability. The aim of this Council's Affordable Housing Delivery Strategy is to address the shortfall in provision for those that may be adversely affected by their circumstances in their ability to access safe and suitable housing.

## 7. CLIMATE CHANGE IMPLICATIONS (IF REQUIRED)

7.1 The Affordable Housing Delivery Strategy has regard to and will deliver directly against the Climate Emergency Strategy, seeking to reduce carbon from the development of Zero Carbon Social and Affordable homes. This will support tenants on lower incomes, as long term running costs from gas and electric will be lower.

## 8. ALTERNATIVE OPTIONS

8.1 The Council could decide not to allocate funds and take decisions to actively deliver additional social and affordable housing but it will not then achieve its Housing priority.

## 9. BACKGROUND PAPERS

9.1. None