

MUNICIPAL YEAR 2016/2017 REPORT NO. 10

MEETING TITLE AND DATE:
Cabinet – 15 June 2016

REPORT OF:
Director, Regeneration & Environment

Agenda – Part: 1

Item: 8

Subject: Custom Build, and Self-Build Programme in Enfield

Wards: All

Key Decision No: KD4200

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1. EXECUTIVE SUMMARY

- 1.1 This report proposes a strategy and mechanism for delivering a pilot programme of affordable, custom build homes, and also self-build homes, on smaller scale Council owned sites in Enfield.
- 1.2 The National Planning Policy Framework requires local authorities to identify suitable opportunities for both custom build and self-build, and forthcoming regulations to be made under the Self-build and Custom Housebuilding Act 2015 is expected to put a greater onus on the Authority to do more to facilitate these opportunities.
- 1.3 The recommended leasehold structure in this report reduces the upfront costs for purchasers, in return for a ground rental income for the Council. This approach can then enable an external organisation to develop custom build housing, and also individuals to undertake self-build development. The appetite for self-build using this model will require further market testing however if sites for self-build are not viable under the lease hold structure, the Council can consider disposal in line with the Property Procedure Rules.
- 1.4 Enfield's recommended strategy and mechanism for custom build is supported by the Greater London Authority (GLA), and would be seen as a prototype and alternative delivery model for affordable and customisable homeownership. If successful this can be rolled out at a greater scale.
- 1.5 Through enabling this kind of development, the borough can benefit from new investment, new accommodation on underutilised sites, and a genuinely alternative housing offer.
- 1.6 The Property Procedure Rules enable the Director - Regeneration & Environment, or Assistant Director to authorise the inclusion of further suitable sites for custom build and self-build development, and for these sites to be granted on a lease as set out in this report.

2. RECOMMENDATIONS

It is recommended that:

- 2.1 Cabinet authorise the Council to adopt the strategy and mechanism for enabling custom build and self-build development as set out in this report, with reference to the draft Heads of Terms attached at Appendix 1.
- 2.2 Cabinet authorise the Council to grant head-lease(s) and leases to an external organisation engaged by the Council on the terms contained in the draft Heads of Terms attached at Appendix 1 to enable affordable custom build development, initially for the sites in Table 1, subject to viability. The final Heads of Terms will be in accordance with the Property Procedure Rules.
- 2.3 Cabinet authorise the Council to explore whether the lease hold structure is viable for self-build development, and grant head-lease(s) and leases to individuals for self-build development on the terms contained in the Heads of Terms at Appendix 1. The final Heads of Terms will be in accordance with the Property Procedure Rules. Should the leasehold approach not be viable for individual self-build sites, the Property Procedure Rules enable the Council to dispose of sites for self-build development which are identified as surplus to requirements.
- 2.4 That Cabinet authorise the principle of an eligibility and selection criteria for both custom build homes and self-build plots, that prioritises Enfield residents and people working in Enfield, and delegate authority to the Director – Regeneration & Environment in consultation with the Lead Member for Housing and Housing Regeneration to agree the final wording of the criteria. The organisation that develops and markets the custom build homes will need to meet the Council's eligibility requirements.

3. BACKGROUND

Increasing housing supply on Council owned land

- 3.1 Through the Small Housing Sites Rolling Programme, the Council is in the process of developing underutilised HRA land, bringing it into more productive use, increasing the supply of housing and new affordable homes in the borough, and in doing so, enabling the Council to spend its Right to Buy receipts.
- 3.2 There are however many smaller scale sites particularly in the east of the borough which due to their relative size, constraints, and the costs/benefits, are not economical for the Council to develop, and would not be an efficient use of resources due to the level of work involved especially when the Council is focussed on delivering much larger numbers of new homes.
- 3.3 Officers have been exploring means of bringing forward development to boost the supply of homes on some of these smaller sites in the short term, without Council investment, or having to increase the in-house resource. At

the same time government policy has changed offering more encouragement for custom and self-build proposals.

- 3.4 This report recommends a strategy and mechanism for enabling the development of affordable custom build & self build housing in Enfield on smaller scale Council owned sites. In taking a proactive role, the Council can set an example to other public landowners in bringing forward underutilised land to increase the supply of new housing while increasing the diversity of housing products.

Defining Custom Build and Self Build: a greater choice for residents

- 3.5 “**Custom Build**” is generally defined as the specification of an individual home through a more ‘hands-off’ approach, where an enabling organisation delivers a range of services, from just creating a serviced-plot right through to delivering a completed bespoke home for an individual or group of individuals.
- 3.6 “**Self-Build**” is generally defined as a project where someone directly organises the design and construction of their new home. This covers quite a wide range of projects, with the most obvious example being a traditional ‘DIY self build’ home, where the self-builder selects the design they want and then does much of the actual construction work themselves and/or direct ‘hands-on’ project management; overseeing both the pre-construction stages and construction works on site.

The current planning position on Custom Build and Self Build

- 3.7 The National Planning Policy Framework requires local authorities to identify suitable opportunities for both custom build and self-build.
- 3.8 The Self-build and Custom Housebuilding Act 2015 places a requirement on local authorities to keep a register of individuals and associations who are seeking to acquire serviced plots of land in the authority’s area. Further regulations are expected to expand on the requirements to be included in the register.
- 3.9 From 1 April 2016 local authorities are required (by the Self-build and Custom Housebuilding Act 2015) to keep a register of individuals and associations of individuals, who are seeking to acquire serviced plots of land in their area in order to build homes for those individuals to occupy. To meet this obligation the Council has joined the Local Self Build Register, a pan-London register that has been set up to support the process of communication between self-builders and local authorities, so that accurate data on self-build demand can feed into local policies and projects. This satisfies the statutory obligation.
- 3.10 The Community Infrastructure Levy (CIL) allows local authorities and the Mayor of London to charge a levy on new development in their area. Funds raised from the Levy are used to provide essential infrastructure required to support growth. Enfield’s CIL was adopted on 1 April 2016 (as approved by

Full Council on 23 March 2016). The 2014 amendments to the Community Infrastructure Levy Regulations made provision for self-builders to be exempt from paying the levy. The exemption, introduced in Feb 2014, applies to anybody who is building their own home, extending their own home or has commissioned a home from a contractor, house builder or sub-contractor for their own occupation. Applicants can apply for a self-build exemption at any time, as long as their development has not commenced. CIL Regulations 54A, 54B, 54C and 54D set out the criteria for which self-build exemption is applicable. On completion of works, they must provide detailed supporting evidence to the Council, and the property must remain their principal residence for a minimum of three years. This information is recorded and monitored on the Land Charges Register and CIL administration database.

AFFORDABLE CUSTOM & SELF BUILD HOUSING: MAKING IT HAPPEN IN ENFIELD

The leasehold structure

- 3.11 The recommended long leasehold structure, will take out the upfront land cost for a purchaser, with the land value instead being paid for through a ground rent so that the Council receives an income stream. The ground rent will be reviewed periodically every ten years, so that the Council will benefit from any uplift in land value.
- 3.12 The advantage of this model is that a prospective custom or self-build homeowner will only need to secure mortgage finance for the construction cost of building a home, and not the value of the land, and therefore a smaller deposit will be required. Other variations of the model are being explored, which will ensure an attractive return for the Council.
- 3.13 It is also proposed that a resale covenant will be included to ensure that new owners cannot sell the homes on at full market value. Resale value would be based on the differential between cost and value when the homes are occupied. Unlike the Starter Homes initiative where homeowners buying through the scheme can sell their property on at 100% of the market value after five years, the proposed Enfield scheme would lock in affordability for future leaseholders with future resales being set at intermediate values.

Return to the Council, and affordability.

- 3.14 It is recommended that an annual ground rent is charged on the leases based on a percentage return of the capital value of the land. This would be subject to a CPI rent review every 10 years, with a market review whenever the property is sold, so the Council would benefit from increasing land values.
- 3.15 Some flexibility will be required to ensure that there is a balance between genuine affordability and an attractive return to the Council. It is therefore

recommended that a return of between 4% and 6% is accepted in principle, subject to a detailed viability appraisal at a later stage on a site by site basis.

- 3.16 The following worked example sets out what the ground rental payment to the Council would be based on a 5% return, for a new home;
- *Total value of new home = £180,000*
 - *Amount required for Custom-build / self-build home mortgage = £120,000*
 - *Land value element of property @33.33%= £60,000*
 - *Annual ground rental payment from buyer to LBE @5% = £3,000*
 - *Weekly ground rental payment to LBE @5% = £58*
- *60 Year Net Present Value of ground rent per home to the Council = £80,000-£100,000*
- 3.17 A cash flow exercise has been undertaken to ascertain the net present value of ground rental payments for worked examples of specific sites.
- 3.18 As a comparison, valuations have been undertaken for a selection of the sites being considered, to ascertain what the Council could receive through straight disposals of the sites. This exercise proves that the value of the income stream from ground rents through the development of these sites using the recommended model will in most cases, if not all cases, be higher than the likely capital receipt from disposal of the sites. Other alternative options are considered in Section 4 of this report.
- 3.19 The Council would not only benefit from the value uplift associated with the external organisation or individual obtaining planning consent, but it would benefit from the greater value of a long term income stream rather than a capital receipt. In addition to that, the mechanism to review the ground rents every ten years would factor in land value uplift so that the Council would benefit from increasing values over time, much like a form of overage.

Custom Build housing product

- 3.20 The Council has identified a not-for profit, external organisation that is set up to manage and facilitate the delivery of this product to assist first time buyers.
- 3.21 Custom build homes can be based on a standardised external typology, designed and built to shell & core with all necessary additions to ensure compliance with Building Regulations. Rather than the much more internally specified living spaces that are provided in most new build developments, this more basic product will drive down costs for prospective homeowners by up to 10%, and give residents far greater choice and creative freedom, in the internal fit out and specification of their home, which they can do in their own time, as and when they can afford it.

- 3.22 A large proportion of young people in London are effectively locked out of home ownership due to an affordability crisis, while there is also a niche market for a housing product which allows greater flexibility for residents in determining the internal layout and specification. Combined with the leasehold structure set out in this report, the custom build product can be seen as a more affordable, bespoke home ownership product aimed at first time buyers.
- 3.23 A joint entry from Enfield Council, Naked House (community custom build organisation), and Pitman Tozer Architects was recently named as one of ten winners in a national competition run by New London Architecture for their proposal 'Making More With Less: Unlocking Leftover Land For Generation Rent'. The proposal was presented to the Greater London Authority (GLA) at City Hall on 30th November 2015 and the GLA have offered their support for delivery of Custom Build and Self Build in Enfield.
- 3.24 Enfield could be the pilot borough for delivering this initiative and that the delivery model can be scaled up to work across other London Boroughs.

Resourcing

- 3.25 It is recommended that the Council engage an external organisation, by way of a head lease, to deliver Custom Build developments.
- 3.26 Once the external organisation signs an Agreement to Lease, the Council's role will be to identify suitable sites, and enter into the final legal agreements at which point the external organisation will take an interest in the land. The external organisation would take on the role of managing the registers/eligibility, and assisting the persons and groups with all of the planning, design and development work and liaison with prospective custom build homeowners through to completion of the homes.
- 3.27 The costs of engaging this external organisation are met by the persons and groups that take up the offer of a custom-build (or potentially self-build) opportunity. Officers are working with Procurement colleagues to ensure that the organisation that is appointed satisfies legal requirements for procurement. For self-build development, the Council is currently exploring ways to administer the process efficiently. If this is done externally then it may be subject to procurement regulations.

Eligibility for custom-build homes, or self build plots

- 3.28 An eligibility and selection criteria that prioritises Enfield residents and people working in Enfield will be put in place. It is recommended that authority is delegated to the Director – Regeneration & Environment to agree the detail of the marketing strategy, as per recommendation 2.4 of this report and how it is operationalised in the most efficient way.

Process to grant a lease

- 3.29 It is proposed to agree a number of standard form agreements to minimise the resource requirement within the Council to operate this programme. These standard form agreements will include;
- an Agreement to Lease for use on multi-home sites
 - an Agreement to Lease for use on single home sites
 - a Head-Lease for use with multi-home sites
 - a Lease for use on multi-home sites, and a Lease for use on single-home sites.
- 3.30 Heads of Terms for these proposed agreements are included at **Appendix 1** to this report.
- 3.31 The Agreement to Lease will be entered into by the custom-build development organisation, or the selected self-build prospective owner when the agreement is reached for them to be allocated a site.
- 3.32 The head lease for the multi-home sites and the leases for the self-build sites would be granted only when planning consent has been obtained by the enabling organisation or individuals.
- 3.33 The leases for the individual home owners on the custom build would be granted out of the head-lease for the multi-home sites, at which time the head-lease would fall away leaving the individual home owners as lessees of the Council.

Proposed sites to be developed and criteria for further sites

- 3.34 There are many smaller scale sites particularly in the east of the borough which due to their relative size and the associated costs/benefits in developing them, are not economical for the Council to deliver through the Small Housing Sites Rolling Programme, and in any case would not be an efficient use of resources due to the level of work involved or financial constraints.
- 3.35 Table 1 sets out an initial schedule of sites that are being considered for custom build development. This report recommends that Cabinet authorise the inclusion of these sites in the head lease to enable custom build development, should they be viable and subject to planning consent being achieved.

Table 1: Schedule of initial sites for Custom Build, subject to due diligence & feasibility.	
Site Address	Site Postcode
Ingersoll Road Garages (1-16)	EN3 5PU
Clarence Road Garages (73-107) and land.	EN3 4BL
Kennedy Avenue Garages (1-20)	EN3 4PB

The Brightside Garages & Car Park (former Garages 1-14, and Garages 14-19)	EN3 5DY
Berkeley Gardens Garages (1-23)	N21 2PD
Bowood Road Garages (1-22)	EN3 7LL
The Sunny Road Garages (1-7)	EN3 5EF
Ordnance Road Garages (1-26)	EN3 6BN
Raynton Road Garages (1-14)	EN3 6BP
Ferndale Road Garages	EN3 6DH
Ramney Drive Garages	EN3 6DU
Ashton Road Garages (26-30)	EN3 6DG
Land at Redlands Road & Leys Road West	EN3 5HW
Chiltern Dene Garages (1-10)	EN2 7HH
Stoneleigh Avenue Garages (10-11)	EN1 4HU

- 3.36 To make Custom Build schemes viable there will need to be a certain scale or critical mass, and this could be in the form of one or two sites with between 5 and 10 homes, and numerous other smaller sites of under 5 homes located in close proximity as a cluster. Where individual sites are not economical for Custom Build, possibly because of size and viability, then they can be made available as Self-Build opportunities for individuals.
- 3.37 The sites in Table 2 have been initially identified for self-build development. Cabinet authority is sought in this report to authorise these sites to be leased to self-builders, subject to market interest, and further feasibility work or failing that, disposed of as self-build plots.

Table 2: Schedule of initial sites for Self-Build subject to due diligence & feasibility.	
Site Address	Site Postcode
Aspen Way Garages (18-24)	EN3 6QR
Ashton Road Garages (26-30)	EN3 6DG

- 3.38 It is recommended that authority is delegated to the Director – Regeneration & Environment or appropriate officer as per the Property Procedure Rules, to authorise the inclusion of further sites for both Custom Build and Self-Build.
- 3.39 Further due diligence needs to be undertaken by the enabling organisation on these sites and any subsequent sites that are identified and included in the programme. The majority of the sites that are proposed to be included are garage sites which the Council owns, and is able to terminate license agreements to ensure vacant possession. The Council will notify garage occupiers well in advance of serving notice to obtain vacant possession where garage sites are taken forward for development.

- 3.40 The Council may need to use its powers at some stage to facilitate the development of these sites, for example where there are access rights, restrictive covenants or parcels of unregistered land. Appropriation for Planning Purposes

4. ALTERNATIVE OPTIONS CONSIDERED

Do nothing.

- 4.1 This option has been considered and discounted, as it is now a legal requirement to maintain a register for custom build and self-build opportunities. Furthermore, the Council can no longer retain underutilised and untidy garage sites in the Borough.

Disposal of the sites at full market value.

- 4.2 This option has been considered, but the likely capital receipts from disposal of these sites will be lower than the net present value of the ground rents the Council could achieve with the preferred option. However where there is no interest in the leasehold structure for the very smallest sites being considered for self-build, and the sites are surplus to requirements, disposals should be considered in line with the Property Procedure Rules.
- 4.3 Savills have undertaken valuations of four garage sites identified in Table 1 above, and residual land values for four sites are as follows;
- Site 1: £185,139
 - Site 2: -£35,477
 - Site 3: £129,734
 - Site 4: £155,009
- 4.4 This exercise proves that the value of the income stream from ground rents through the development of these sites using the recommended lease hold model will in most cases, if not all cases, be higher than the likely capital receipt from disposal of the sites and while disposals would generate some cash upfront, this would not have a significant impact on the Council's 30-Year HRA Business Plan when compared to an ongoing income stream.
- 4.5 There is also a more comprehensive argument for supporting the recommendations in this report; including the custom build and self build agenda. The disposal of sites would not achieve the objective of making the custom and self-build programme more affordable.

Development of the sites for new housing by the Council

- 4.6 Council development of these sites has been considered. However given the relative level of risk and return on investment for these sites, they are not considered to be economically viable considering the number of other sites which are coming forward as part of Phase 2 of Small Housing Sites Rolling Programme. A report will go to Cabinet later this year seeking funding for the development of further schemes as part of this programme.

Flexible Housing

- 4.7 'Quick build flexible housing' has been considered for these sites however it is understood that the sites are not of a sufficient scale for this type of temporary housing solution to work.

Bring the sites back into use as garages or parking areas.

- 4.8 This option has been considered and discounted given the acute need for additional homes in the borough.

5. REASONS FOR RECOMMENDATIONS

- 5.1 There are a number of benefits for Enfield in introducing an alternative delivery model such as Custom and Self Build. These include;

- Bringing into a more productive use, small underutilised sites that can collectively have a number of economic, social and environmental benefits.
- Increasing the supply of new homes which can be prioritised for Enfield residents.
- Increasing Enfield's Council tax base.
- Generating a long term revenue stream through ground rents.
- Increasing housing supply in Enfield and contributing to the borough wide target set by the GLA.
- Inclusion of the local supply chain, and especially SME contractors and sub-contractors.
- This approach requires little resourcing from the Council.
- This approach can demonstrate the Council's proactive approach to increasing housing supply, increasing affordable home ownership, and its commitment to the custom and self-build agenda.

6. COMMENTS OF THE DIRECTOR OF FINANCE, RESOURCES AND CUSTOMER SERVICES AND OTHER DEPARTMENTS

6.1 Financial Implications

- 6.1.1 Currently, the garage sites included in Tables 1 and 2 are between 30-40% occupied, with each garage producing an annual income of £520 for the Council. The majority are in a poor state of repair and it is estimated that the cost of bringing all garages on these sites back into 100% occupancy would not be recouped for eight to nine years.

- 6.1.2 As indicated in the report, further detailed costing and financial modelling work would be carried out on each site to ensure that the most viable option is pursued. However, taking one example which has been modelled for illustrative purposes, a site which has been

valued at £130,000 with estimated sufficient space for nine units would give the Council an initial annual ground rental income stream of £27,000, plus Council Tax and New Homes Bonus payments. The net present value of the ground rental income stream would £720,000. In this case, based on current information and assumptions, it is clear that the custom build route would be the more financially beneficial to the Council.

- 6.1.3 The delivery model proposes that the Council will lease the sites to an organisation or individuals, and that an enabling organisation will recoup all of the costs of setting up and running the scheme from the customers wishing to participate. The Council will therefore incur minimal costs to deliver these schemes. A small administration charge is assumed for collection of ground rental income in the figures quoted above.

6.2 Legal Implications

- 6.2.1 The Self-build and Custom Housebuilding Act 2015, when brought into force, will place a duty on certain public authorities (including London Boroughs) to keep registers of individuals and associations of individuals who wish to acquire serviced plots of land in order to bring forward self-build and custom housebuilding projects. A “serviced” plot of land in this context means one which will satisfy specified requirements about utilities and other matters.
- 6.2.2 Councils must publicise the registers and have regard to them in carrying out their planning and other functions and when disposing of any land.
- 6.2.3 The 2015 Act provides for regulations to be made by the Government regarding the eligibility criteria for persons to be entered onto the registers.
- 6.2.4 Where the Council procures works, supplies or services in connection with the proposals contained in this Report (for example, when selecting the enabling organisation referred to 3.21 above), it must comply with UK/EU procurement legislation where applicable, and the Council’s Contract Procedure Rules. On the face of it, the contracts to be entered into by the Council will be leases, which are interests in land, and should therefore fall outside the Procurement Regulations 2015 (“ the Regulations “). For this to continue to apply , clearly the final leases which are developed from these broad Heads of Terms, must maintain the ability to fall into the category of ‘ interests in land’ under the Regulations, and it would be prudent therefore to check this is still so when the final draft of the leases are produced. When compiling and operating the registers in any event, the Council must be guided in all its actions by the principles of equal treatment, transparency and non- discrimination - which in the event of any challenge to its admissions to the register, and/or operation of the register, should then enable it to present a suitable defence to any

such challenge. In addition, all legal agreements must be in a form approved by the Assistant Director of Legal Services.

- 6.2.5 There is the potential for a state aid risk if any of the land interest disposals by the Council are carried out at below market value to an 'undertaking' so the Council should ensure that any land interests granted are at market value, or if they are below market value that they are not granted to an undertaking. An undertaking is an entity engaged in economic activity, which would include developers for example. Charities and not-for profit organisations are capable of being undertakings if they are undertaking economic activity so this would need to be checked on a case by case basis if any transactions are at an undervalue. Individuals acting in their private capacity (i.e. as residents) will not be undertakings, but individuals acting commercially (for example an individual acting as a property developer or landlord) can be. There do not appear to be any other risks in relation to competition law.

6.3 Property Implications

- 6.3.1 This initiative to facilitate the provision of affordable custom build and self-build homes in the borough is supported by Strategic Property Services in principle as it delivers choice, provides new accommodation and represents a genuine alternative housing offer.

- 6.3.2 There are however a number of practical considerations which need to be fully explored prior to implementation. These include :

6.3.2.1 For self-build, the limitation to offer sites to applicants who either work or live in the borough potentially runs contrary to the Property Procedure Rules insofar as it restricts the "marketing reach" and may not deliver "Best Consideration". However, the eligibility criteria is no different to shared ownership and other products being offered on Council and non-Council developments where Enfield residents or workers are prioritised.

6.3.2.2 The mechanism to make between a 4% - 6% annual return on notional land value may be difficult to achieve in areas where development proves unviable or considered unfair where the return is based on the market value of the asset including tenants improvements.

6.3.2.3 The alternative option to consider either a land sale or offer the land for this housing initiative should be considered on a case by case basis as not all sites will deliver "best consideration" under this financial model.

6.3.2.4 Self-builders are usually entitled to a full VAT reclaim on all construction and related costs and therefore this important

incentive should be considered within the overall financial model together with liability for Stamp Duty Land Tax.

6.3.2.5 On multi plot sites, in the interests of improving plot values, consideration could be given to the Council or third party enabler providing initial investment in the form of fully serviced plots including site access and roads, all utility supplies and mains drainage.

6.3.2.6 The legal agreements proposed in this report must be granted in accordance with the Property Procedure Rules.

6.3.2.7 The valuation of the land interest in order to be determine the initial ground rent should be obtained from an independent valuer.

6.3.2.8 The proposed revaluation when the properties are disposed of in the future would also be undertaken by an independent valuer.

7. KEY RISKS

7.1 As with any development, there are a number of associated risks, however the Council is passing on the planning, funding, viability and delivery risks to the not for profit development organisation. The recommended approach in this report carries a low level of risk to the Council, especially given the scale of the proposal.

8. IMPACT ON COUNCIL PRIORITIES

8.1 Fairness for All

Housing continues to be both a great cause and manifestation of inequality as London is gripped by an affordability crisis. Enabling the development of otherwise redundant or underutilised sites and putting in place a process to enable development for custom and self-build households for up to 30% less than a market value home can help unlock the opportunity of homeownership to a demographic which is currently locked out of the market, and a demographic that wants an active involvement in the design and specification of their home. This can be achieved while generating an attractive financial return to the Council.

8.2 Growth and Sustainability

The proposal seeks to bring economic improvement to underutilised sites in the borough, which can generate revenue for the Council, while providing employment opportunities during construction. In terms of sustainability, the intensification of the borough through the development of infill brownfield sites would represent a sustainable form of development.

8.3 Strong Communities

The proposal seeks to listen to the needs of people who want to have more control in the design and specification of their new homes for custom, build, or potentially have complete control over the whole process if they pursue self-build.

9. EQUALITIES IMPACT IMPLICATIONS

- 9.1 There may be Equalities Impact Implications arising from the allocations process of the new homes. The Council will ensure that the eligibility criteria consider these implications.

10. PERFORMANCE MANAGEMENT IMPLICATIONS

- 10.1 There are no notable Performance Management implications arising from this report.

11. HEALTH AND SAFETY IMPLICATIONS

- 11.1 There are no notable Health & Safety implications arising from this report.

12. HR IMPLICATIONS

- 12.1 There are no notable Health & Safety implications arising from this report.

13. PUBLIC HEALTH IMPLICATIONS

- 13.1 Housing is a determinant of health and this proposal should therefore positively impact the health of prospective residents. All of the homes will be designed to achieve or exceed the Mayor's internal space standards, amenity space standards, and achieve high levels of sustainability and energy efficiency.

Background Papers

None

Appendix 1 – Heads of Terms (DRAFT)