

Meeting:	Cabinet
Date:	17th October 2022
Classification:	General Publication
Title:	Truly Affordable Housing
Wards Affected:	All
Policy Context:	The recommendations increase the number of truly affordable homes built and managed by the Council and sets a commitment for affordable provision on all future schemes to be mainly social rented homes (70%) and for these to be family homes.
Key Decision:	Yes
Financial Summary:	The indicative cost of the range of proposals to increase the Council's affordable homes is £43m. This is based on the income forgone by changing tenure. It is recommended that funding from development schemes currently on hold is redirected to support these new proposals.
Report of:	Debbie Jackson, Executive Director of Growth Planning and Housing Gerald Almeroth, Executive Director Finance and Resources

1. Executive Summary

- 1.1. Westminster City Council is committed to maximising the delivery of truly affordable housing across the Council's housebuilding pipeline. This report begins the process of ensuring that council-led development schemes prioritise low-cost social rent housing and provide Westminster residents and their families with genuinely affordable housing options.
- 1.2. The recommendations of this report will see the initial delivery of at least 143 new social rented homes in Westminster, outline the way that major regeneration schemes can deliver a further 100 or more social homes and authorise acquisitions so that more people on the waiting list can be housed in the City. This will add to the 1,200 social homes already in the Council's development pipeline and will begin addressing the waiting list of more than 4,000 households currently registered for social housing. It will begin to reduce the numbers of families relying on temporary accommodation (particularly those currently housed outside of the borough).
- 1.3. Following the local election in May of this year and in-line with manifesto promises, the new administration has implemented a cross-council plan to deliver more truly affordable homes. This means that wherever the City Council is undertaking housing development schemes the emphasis will be on delivering new social rent homes to tackle the acute shortage in the borough.
- 1.4. The benefits of social housing are extensive. It provides residents a stable, long-term home and grants security to tenants that often cannot be found in the private rented sector. The benefits to Westminster's communities can range from workforce supply to local businesses, through to strong family and care networks for established neighbourhoods. People on low incomes can continue to live close to jobs that require their skills within secure housing that is resilient to rising market prices.
- 1.5. In addition to the benefits to individuals and communities, the creation of more Council owned social rent homes reduces the Housing Benefit burden to the local authority. The cost of temporary accommodation has a significant cost to the Council with homes often sourced at a higher rate from the private sector due to demand. While being costly to the Council, this type of accommodation can often be unsuitable for families with children and vulnerable people.
- 1.6. The recommendations set out in this report will trigger the conversion of over 100 already consented market sale homes into affordable homes at social and intermediate rent levels. The plans also propose a rebalance of the 60:40 split in favour of intermediate rent housing to a 70:30 split in favour of social rent homes, prioritising their delivery on forthcoming schemes. A further 71 open market homes will be acquired and converted into temporary accommodation, providing more in-borough housing provision.
- 1.7. The decisions set out in this report will look to make an impact where the need is greatest. 79% of the 4,000 households registered on the waiting list for social housing require a family sized home with two bedrooms or more. The current

waiting list exceeds 30 years for large homes, whereas 83% of the 2,000 applicants for intermediate housing are eligible for a one-bedroom home. By converting family sized intermediate homes to social rent homes the Council can address residents needs while still providing low cost rented homes for those who are ineligible for social housing.

- 1.8. This report marks an important first step in how Westminster Council delivers truly affordable housing. It identifies further options, which the Council will explore, to increase the delivery of affordable homes through the Council's major regeneration projects, its subsidiaries and through partnerships with private sector developers.
- 1.9. Following the recently implemented strategic review, the Council has formulated a new strategy for development on the Council's own land. The strategy recognises the role the Council's major regenerations projects have to play in increasing truly affordable housing as well as identifying further opportunities for example, acquisitions funded by the Greater London Authority's (GLA) right to buy back.

2. Recommendations

That Cabinet:

- 2.1. Approves, subject to legal due diligence, the proposed change of tenure from intermediate rent to social rent at the Council's developments at Luton Street, Ashbridge, Luxborough, West End Gate, Torrison and Carlton Dene, in line with the changes proposed in section 6, and from shared ownership to intermediate rent at Lyons Place, as detailed in section 7.
- 2.2. Approves, subject to legal due diligence, the proposed change of tenure from market homes to affordable rent, and within affordable tenures, at 300 Harrow Road and Westmead development schemes.
- 2.3. Delegates authority to the Executive Director of Growth Planning and Housing
 - i) to approve any necessary terms to effect recommendations at section 2.1 and 2.2.
 - ii) in consultation with the Director of Law, to enter into and or amend any existing legal and financial documents, planning agreements and submit planning applications as required to implement recommendations at section 2.1 and 2.2.
- 2.4. Notes that the intermediate housing at Jubilee Phase 2 and Parsons North, as well as the private homes at Cosway Street, are unaffected by this report.
- 1.1. Notes that the relevant Cabinet Member may make further decisions, in consultation with the Cabinet Member for Finance and Council Reform, on the projects outlined in section 7 and any others which may be identified, in accordance with the strategy proposed in this report.

- 1.2. Approves that the development of schemes at Blomfield Mews, Woodchester, Bayswater and Brunel are put on hold and that the allocated funding be removed from the capital programme and redirected to support the delivery of proposals within this report. In addition, approves the HRA undertaking £4.5m of additional borrowing to fund the proposals.
- 1.3. Notes that the additional grant funding from the Greater London Authority (GLA) referenced in this paper is subject to separate approval from the relevant Cabinet Members.
- 1.4. Delegates authority to the Executive Director of Growth, Planning and Housing, in consultation with the Director of Law, to take all or any further actions required by the Council to facilitate the decisions of Westminster Builds (WHIL or WHDL) or Westminster Community Homes, where those actions align with the recommendations of this report.

3. Reasons for Decisions

- 3.1. In June 2022, Cabinet Members requested a review of the Council's development programme with the aim of increasing the delivery of Truly Affordable Housing. A Future of Westminster Commission was established with specialist housing professionals providing advice on increasing genuinely affordable housing. As a priority, looking at options for improving the Council's response to homelessness and housing need, as well as the quality of services provided to tenants and leaseholders.
- 3.2. A clear objective was provided to Council officers, who, considering a range of options, have developed a preferred way forward presented in this report. By a combination of converting market homes to affordable as well as changing the tenure of affordable homes of two or more bedrooms to social rent, 143 more social rent homes can be created. In addition, the preferred way forward sets out the approach to major regeneration projects at Church Street and Ebury.
- 3.3. The Council's development programme is well established, and the projects affected by the changes are at various stages of governance. By consolidating the changes across the programme, the resulting financial and legal implications can be considered in full. This report clarifies which projects are unaffected by the review, recommends schemes where the changes can be enacted and sets out the future governance for projects which, by their scope and implications, require separate approval.
- 3.4. Where this report refers to Westminster Builds (WB) it can be interpreted as applying to either Westminster Housing Investments Limited (WHIL), Westminster Housing Developments Limited (WHDL) or both.

4. Background, including Policy Context

- 4.1. The new City Council administration made the commitment in their manifesto that building new council and lower rent homes is the top priority. This report enacts this commitment and makes pragmatic amendments to Westminster's already established development programme. With several completed schemes and live projects at all stages of development this presents a timely opportunity to identify where further social and low rent homes can be delivered.
- 4.2. The Council committed to a day-one review of all current regeneration and infill programmes, seeking to increase the amount of social and truly affordable housing delivered in the borough. This included a reduction in private housing where alternative funding sources could be drawn upon.
- 4.3. The Council's affordable housing provision requires rebalancing to reflect need. The intention is to undertake a new housing needs assessment and to review this aspect of the Council's City Plan to bring it more in line with practice elsewhere in London. Just over 4,000 households are currently registered for social housing, with 79% of those requiring a home with two bedrooms or more, whereas 83% of the 2,000 applicants for intermediate housing are eligible for a one bed home.
- 4.4. The City Plan 2019-2040 sets an expectation that 60% of affordable homes will be intermediate housing, with the remaining 40% social housing. However, the Council's new strategy is to commit to social housing making up 70% of affordable housing built on public land.
- 4.5. A review of the Council's existing and planned intermediate housing has been undertaken, aligned with current waiting lists for both social and intermediate homes. Tackling the acute shortage of social housing in the borough is the Council's top priority.

5. Truly Affordable Housing

- 5.1. Following a strategic review of the Council's developments, considering the design, management, financial, legal and practical implications of tenure changes across built schemes as well as those under construction and in design, there are two proposals:
 - That all planned market homes at 300 Harrow Road (61 Homes) and Westmead (41 Homes) will now be delivered as affordable housing.
 - With limited exceptions, all affordable homes of two or more bedrooms now be reclassified as social rent and those with one bedroom as intermediate rent at no more than London living rent.
- 5.2. Application of these proposals to the current programme has created 143 new social homes through a reduction of market homes by 102 and intermediate by 41. It is estimated that this will cost the Council £44m in income forgone, with potential further programme and design costs.

- 5.3. These changes make a significant contribution to meeting housing need and delivering the Council's new policy. There will be significant savings in the costs associated with providing temporary accommodation and housing benefit payments.
- 5.4. The delivery of new permanent social rent homes will have substantial socio-economic benefits for children and vulnerable people which have also been considered in making these decisions and are captured in the EQIA (Appendix A).
- 5.5. The table below sets out the impact of the proposed changes and is expanded in section 6 of this report.

Table 5.1 – Preferred way forward for expanding provision of Truly Affordable Housing

	New Affordable Homes	Change in Intermediate	Change in Social Rent	Indicative Cost
Market Homes to affordable	102	+18	+84	£38m
Intermediate rent to Social Rent	0	-59	+59	£6m
Total	102	-41	+143	£44m

- 5.6. The assumptions underlying the indicative cost are set out in the financial implications of this report. The indicative costs include an expectation of £10m more GLA grant funding which has not yet been secured. The GLA have intimated they would provide additional grant for new affordable homes but will maintain current grant rates for any existing intermediates switching to social (i.e. normally £28,000 per home).
- 5.7. The Council has identified funding sources to meet the additional net cost of £44m and these are set out in the financial implications.

6. Project Implication

Market to Affordable – 300 Harrow Road and Westmead

- 6.1. All market homes at 300 Harrow Road and Westmead will now be delivered as affordable homes. In total, 102 new affordable homes will be created, a mix of social and intermediate.
- 6.2. The 100% affordable residential homes will be re-balanced, so that all one-bedroom homes (including the studios on 300 harrow) will be let at London Living Rent by Westminster Builds and the homes with at least two bedrooms will be held by the HRA as social rent.

Table 6.1 – Tenure split of homes

	Market	Intermediate	Social	Total
300 Harrow Road	0 (-61)	35 (+1)	77 (+60)	112

Westmead	0 (-41)	31 (+17)	34 (+24)	65
Total	0 (-102)	66 (+18)	111 (+84)	177

6.3. Some of the implications of switching from market to affordable are set out below, all of which are likely to prolong the programme and therefore create additional cost, more so on 300 Harrow Road which is currently under construction and has less capacity in its programme to absorb changes.

- **Specification change:** The specification of market homes is not suitable for the long-term management of Council housing; the Council's affordable housing specification will be implemented where practical.
- **Planning Position:** Existing planning consents, amongst other conditions and requirements, specify the tenure types. Each planning consent and related legal agreement will require consideration to ascertain what (if any) amendments are required to give effect to the change in tenure as set out in this report.
- **Design:** While the Council builds tenure blind schemes, the internal workings of buildings is designed around the operation and management. A change in tenure may create inefficiencies, some of which may be able to be addressed through variations.
- **Programme and Cost:** Changes to a scheme mid-construction will have programme and cost implications as orders may have lead-in times which disrupt sequencing. This will impact overall viability.
- **Contractual and reputational:** The Council will need to conduct a review of existing agreements and may need to vary or terminate contracts, particularly those relating to private sale. There may be cost implications arising from this. The Council has however been careful not to disrupt private sales that were underway or that were being actively marketed.

6.4. By converting market homes to affordable the Council will forgo income, which had been factored into the overall affordability of its capital programme. This is to achieve the wider benefits of delivery of social and low-cost rent homes.

6.5. The market homes at 300 Harrow were forecast to generate £42m. While a portion of this loss is offset by the financial value of social and intermediate homes and new GLA grant, it will nevertheless result in the Council forgoing £28m of income to move to 100% affordable. The homes at Westmead had been earmarked for market rent and attracted a lower valuation of £21m; the cost of moving to 100% affordable results in £10m of income forgone.

6.6. The value of the new homes will be retained, held on the Council's balance sheet, and managed by the Council. Should the Council wish to do so, the homes could be sold on the open market at a later date and their value realised.

Intermediate to Social rent – Other Projects

- 6.7. The report recommends rebalancing the provision of affordable housing to tackle waiting lists for social and intermediate rented homes in Westminster.
- 6.8. Just over 4,000 households are currently registered for social housing, with 79% of those requiring a home with 2 bedrooms or more, whereas 83% of the 2,000 applicants for intermediate housing are eligible for a one bed home.
- 6.9. To ensure affordable housing is made available to those with the greatest need, the Council will reallocate all affordable homes with two or more bedrooms to social rent and all one bed homes to intermediate rent. Where there are relatively few one-bedroom homes on a project, these too are proposed to be switched to social, reducing the complexity of management and negating the requirement to involve a 3rd party, i.e. Westminster Builds. This effects Luton Street, Ashbridge and Torridon.
- 6.10. While switching from intermediate to social rent does not create any 'net' new affordable housing, it increases the amount of genuinely affordable low rent homes and better targets the Council's resources to the greatest need.

Table 6.2 – Intermediate rent homes converted to social rent

	Intermediate	Social	Total
West End Gate – B	21 (-8)	47 (+8)	68
Luton Street	0 (-19)	59 (+19)	59
Ashbridge	0 (-10)	26 (+10)	26
Luxborough	7 (-7)	7 (+7)	14
Carlton Dene	0 (-7)	22 (+7)	22
Torridon House	0 (-8)	21 (+8)	21
Total	28 (-59)	182 (+59)	210

- 6.11. Unlike converting market to affordable homes, switching between types of affordable tenure is less complex as the Council's specification and design is universal for affordable tenures.
- 6.12. However, amendments to planning consents and related legal agreements will be required as these documents had previously specified the individual tenure types. There will also be an income implication as intermediate homes had been earmarked to transfer to Westminster Builds providing a capital receipt to the HRA. Instead the HRA will receive a lower ongoing income through social rent receipts, as well as management costs, which reduces the HRA affordability.
- 6.13. Creating 59 new social homes is estimated to cost £6m, which reflects the lower rent levels of social homes compared to intermediate and therefore reduces their capitalised value.

7. Further Opportunities

- 7.1. This report focuses on changes that can be implemented quickly but also identifies further opportunities which the Council will pursue to deliver more truly affordable housing. This includes setting a precedent that future schemes will target 50% affordable with 70% of the affordable homes being at a social rent. Where practical the social homes will have at least two-bedrooms.

Major Regenerations – Ebury and Church Street

- 7.2. Reflecting the strategy, work has commenced on Ebury to review the tenure mix and distribution as well as addressing emerging inflation and viability pressures. A separate Cabinet Member report will bring forward several options including rebalancing the provision of affordable housing to 70% social rent and 30% intermediate rent.
- 7.3. The Council's development team have recently reviewed options for the Church Street scheme to align the project with the intentions of the Truly Affordable Housing agenda. The preferred way forward is to adjust the planning approved tenure mix to provide 70% social rent and 30% intermediate within the affordable housing provision.
- 7.4. Across Church Street Site A and Ebury this is expected to create in excess of 100 new social rented homes, compared to previous proposals.
- 7.5. The Council is continuing to assess the potential and implications of securing GLA funding for its major regeneration projects.

Lyons Place

- 7.6. The Council acquired ten shared ownership homes at Lyons Place, one of which has been sold and a further two are currently in conveyancing. The remaining seven (4x1 beds, 3x2 beds) are unoccupied. It is recommended that the Council converts the unsold properties to intermediate rent of no higher than London Living Rent.
- 7.7. Consideration has been given to a range of options detailed in the table below which illustrates the benefit to the Council of converting the shared ownership homes at Lyons Place to intermediate rent. Although the annual surplus is reduced, there is still a return to the HRA on an annual basis.

Table 3: Tenure Type	Annual Surplus / (Deficit)	Investment Payback
Shared Ownership	£50,000	14
Intermediate Rent – London Living Rent	£15,000	42
Social Rent (with additional GLA grant)	(£10,000)	-
Social Rent	(£25,000)	-

- 7.8. The table shows the average annual surplus/(deficit) which considers rents received, operational and management cost of the homes as well as the financing costs of the initial purchase price. A deficit means the financing costs of the acquisition cost exceed the net rents generated from the homes. With regards to the social rent, the deficit would impact on the Housing Revenue Account (HRA), with a £25k annual deficit equating to £1m reduction in borrowing capacity.
- 7.9. If the homes were held at social rent, the initial purchase cost would not be recovered. However, by instead converting them to intermediate rent the homes will create small surplus and payback the initial cost over a period of 34-42 years, depending on rent levels. Albeit this will be a reduced surplus compared to shared ownership. The extra costs associated with shared ownership are currently making the homes difficult to sell with an intermediate rental product more affordable for people living and working in the City.
- 7.10. The Council will require a Deed of Variation to the original s106 agreement related to the planning consent to change the tenure of the remaining 7 homes from shared ownership to intermediate rent, subject to approval of the freeholder, Almacantar. In line with the Council's normal approach, the intermediate homes will be held by Westminster Builds.

Right To Buy Back (RTBB) Fund

- 7.11. The Council has secured GLA funding for a new programme of 71 open market acquisitions in Westminster to be used as temporary accommodation (TA) for homeless households. Held in the General Fund, the homes will be funded by GF borrowing and GLA grant under their RTBB programme. The Council will continue to seek GLA funding for acquisitions beyond the March 2023 deadline.
- 7.12. The GLA will provide funding of £65k per home for acquisitions completed by March 2023. The table below estimates the total cost, including legal and stamp duty, total grant and the net borrowing cost, which will be funded by net rents

	2 Bed	3 Bed	4 Bed	Total
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No. units	45	21	5	71
Acquisition cost	£21.8m	£11.7m	£3.3m	£36.8m
GLA Grant	(£2.9m)	(£1.4m)	(£0.3m)	(£4.6m)
Borrowing Required	£18.9m	£10.3m	£3.0m	£32.2m

8. Out of Scope

8.1. The report recommends that some projects are out of scope of the strategy and should not be explored further. These are:

Cosway – 49 Market Sale Homes – Prohibitive Cost

- Loss of £60m sales receipts would disproportionately affect the HRA

Jubilee Phase 2 – 19 Intermediate Rent Homes – Contractual arrangements

- Homes were purchased from a developer who has specified they cannot be used for social rent.
- The homes are owned by Westminster Builds and would need to be acquired by the Council

West End Gate Block E and F – 8 Intermediate – All one bed homes

Parsons North – 9 Intermediate – owned by Westminster Builds and substantially let to tenants by the time of review

9. Future Governance

9.1. The recommendations in this report focus on projects which are ready to implement the strategy and notes that, on some projects not included in the report's recommendations, further decisions will need to be taken following more detailed analysis.

9.2. For projects where the tenure mix has previously been approved by Full Cabinet, it is proposed that future decisions be considered by the relevant Cabinet Member, subject to the decision aligning with the general strategy set out in this report.

9.3. Anticipated future cabinet member reports (CMRs) resulting from the strategy are set out below, with guide timelines.

- Right to buy back – Approval to enter GLA contract – Q4 2022
 - Ebury all phases - updated tenure mix – Q1 2023
 - Church Street – ballot strategy and tenure mix - Q1 2023
 - Westmead - Full Business Case, including revised tenure mix – Q1 2023

9.4. The strategy will be applied to future schemes as part of project development and viability reviews.

10. Financial Implications

10.1. The paper sets out the proposed strategy to increase the levels of affordable housing delivered through Westminster's development programme.

Westminster's Development Programme

10.2. The indicative costs presented focus on the income forgone by changing tenure. For example, where a home moves from private sale to social rent, a comparison is made between the previously anticipated sales receipt and the new capitalised value of the social rent home. This is the opportunity cost of providing a social rent home.

10.3. In addition to the income forgone, there may be costs incurred from changes to specification or programme delays arising from the tenure change, e.g. from revised planning approvals. In relation to 300 Harrow Road and Westmead these cost implications will be worked up in detail and presented in future reports for each project. The cost implications on moving intermediate rent homes to social rent will be less significant and will be absorbed by the HRA.

10.4. The income forgone by changing 102 market homes across the 300 Harrow Road and Westmead development sites is estimated at £37.8m. In addition, the paper sets out a range of proposals across several sites whereby intermediate homes with two or more bedrooms will be converted to social rent. The estimated cost of this change is £5.7m. The combined total cost of the proposed Strategy is £43.5m.

	Loss of Sales Receipt	Change to Int. Homes	Change to Social Homes	Additional GLA Grant	Income Forgone
Market sale to Affordable					
300 Harrow Road	(£42.0m)	(£0.3m)	£8.3m	£6.0m	(£28.0m)
Westmead	(£21.3m)	£3.7m	£3.7m	£4.1m	(£9.8m)
Sub Total	(£63.1m)	£3.4m	£12.0m	£10.1m	(£37.8m)
Intermediate to social rent					
59 across 6 sites		(£13.5m)	£7.8m		(£5.7m)
Total	(£63.1m)	(£10.1m)	£19.8m	£10.1m	£43.5m

10.5. The Council has identified a range of potential funding sources to implement the proposals set out in this report. These are as follows:

- **Repurposing funding for on-hold pipeline projects - £39m** – Four projects have been identified which are currently at an early stage of development without a preferred way forward (Woodchester, Bayswater, Brunel and Blomfield) Refocusing the Affordable Housing Fund (AHF) and HRA borrowing earmarked to these schemes to deliver the proposed changes set out in this paper, the Council can have an immediate impact on affordable housing. The budgets for these projects will be removed from the capital programme until viable preferred way forwards are worked up.
- **Additional HRA Borrowing - £4.5m** - The HRA Business Plan has been reviewed and capacity identified to support a small amount of additional borrowing.

10.6. The funding changes identified above will be implemented immediately and captured within the revised capital programme as part of the normal budget setting process in February and March 2023. It should be noted that where funding streams include future projections of income (e.g. AHF), there is a risk that this may not fully materialise which will need to be carefully monitored.

Further Opportunities

- 10.7. It is noted that the Council has secured funding for a new programme of 71 open market acquisitions for use as temporary accommodation for homeless households under the Right to Buy Back initiative. The estimated cost of these acquisitions is £36.8m funded by GLA grants of £4.6m and general fund borrowing of £32.2m.
- 10.8. The annual revenue cost of borrowing of £1.7m will be funded by the rents generated, which for temporary accommodation of 2 Beds or more is £500 per week, reducing to approximately £305 per week after management and operational costs are deducted. In addition, the purchase of these units will allow the Council to directly provide temporary accommodation which will create a cost saving versus the cost of sourcing equivalent accommodation from the private sector (estimated to be £10k per unit per annum).

11. Legal Implications

- 11.1. The Council has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness-the best value duty.
- 11.2. The Council has a general power of competence under section 1 of the Localism Act 2011; this is the power to do anything an individual can do provided it is not prohibited by other legislation.
- 11.3. Section 8 of the Housing Act 1985 provides the Council with a duty to consider housing needs in respect of its district. Section 9 of the Housing Act 1985 provides the Council with the power to provide housing accommodation. Under

Section 111 of the Local Government Act 1972 the Council has the power to do anything incidental to the exercising of any of its functions.

- 11.4. The recommendations will require (as necessary) examination of planning consents and related legal agreements, existing contracts, proposed contracts relating to sale and leasing arrangements, whether consent from third parties is required (if applicable), design and construction documents, title documents and consideration of procurement for construction and design and sale and leasing arrangements amongst others are to be assessed
- 11.5. Contract documents should secure compliance with the terms of the existing legal agreements, current GLA funding conditions (and GLA approval as to any necessary changes), the Public Contracts Regulations 2015 (as amended from time to time) and the Council's procurement code.

As a result of the legal examination above, if issues are identified which affect the implementation, consideration will need to be given to the appropriate actions required to address them and further decision making required on each project may be required. Implementation of the recommendations may result in variations to the terms and conditions, changes to the specifications, design, construction briefs, increased costs, revised pricing mechanisms and structures, compensation payments for any potential termination of existing agreements and may require the agreement of any other parties to the legal agreements.

- 11.6. The Council will also have to consider how the implementation of the recommendations may affect current timelines and GLA funding deadlines as to construction projects and procurement processes. All such documents and any current procurement processes will therefore need to be reviewed, and legal implications provided on a case-by-case basis. As necessary input should be sought from procurement colleagues. Moreover, any changes may also be subject to endorsement by the Commercial Gateway Review Board (CGRB) in accordance with the Council's Procurement Code prior to approval being sought and granted from the relevant decision makers as outlined in this report.
- 11.7. In determining a Council own planning application or amendments to any planning consents the Council (as Local Planning Authority) must assess the application as it would any other application in accordance with all statutory and policy requirements. In respect of all Council-own applications the law requires appropriate functional separation. It is therefore particularly important to ensure that throughout the process the development/corporate landowner function of the Council is kept separate from the local planning authority function.

12. **Carbon Impact**

- 12.1. There are no direct Carbon implications arising from the recommendations in this report. Each scheme will consider its carbon implications as part of its individual, normal governance processes.

13. Equalities

- 13.1. By creating more social housing the Council increases the supply of social rented homes positively impacting those residents the Council has a statutory duty to house. It reduces the number of residents in overcrowded homes or living in temporary accommodation, provides stable and secure tenancies and housing more suitable to vulnerable residents and families.
- 13.2. The increase in affordable housing, particularly social housing is expected to have a significantly positive impact on protected characteristics and will have a positive impact on those characteristics disproportionately represented on the Council's social housing waiting list.
- 13.3. Individual projects will consider their individual equalities implications. However, appendix A provides an overview of the equalities impacts of the recommendations in this report.

14. Consultation

- 14.1. Resident consultation will be undertaken as part of the planning process due to the recommendations in this report necessitating planning permission amendments.

If you have any queries about this Report or wish to inspect any of the Background Papers, please contact:

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