

Agenda Item No: 6



Report To: Cabinet

Date of Meeting: 17th December 2020

Report Title: Affordable housing – our delivery, aspiration and Housing Revenue Account Business Plan

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Portfolio Holders Cllr. Bill Barrett and Cllr. Neil Bell

Portfolio Holders for: Housing and Finance

Summary: The purpose of this annual report is to set out the priorities within the HRA. The Council must have a 30-year Business Plan for its HRA. The viability of this plan is the foundation of every decision taken in the HRA. This ensures a holistic approach to balancing the need to increase our stock (given demand) while providing quality, energy efficient homes and sustaining tenancies.

Our tenants want to call the borough home and be a part of the communities in which they live. The recently published Social Housing White Paper talks about eliminating the stigma attached to living in social housing. This report details how our policies will place this respect at the heart of our work liaising with, and providing for, our residents.

During lockdown, construction was deemed an essential industry. Therefore, work has continued as the Council's new-build schemes are delivered. The report details a strong pipeline of sites and a refined acquisitions programme – crucial in light of the continued national focus on housing delivery. Additions can only be achieved by paying meticulous attention to our finances and resources. These are critical factors at any point in time, but in the context of the recovery phase of a pandemic, are more so.

The HRA Business Plan still depicts a robust and viable business. It is able to deliver key priorities, even in the context of increased development, management and maintenance programmes – and a pandemic. The effects of the pandemic, pre-empted as far as possible, mean that national political, economic and legislative changes could adversely affect this financial position, so any projects must continue to be fully risk assessed to ensure resilience within the overall model. We will continue to budget responsibly.

Key Decision: No

Significantly Affected Wards: None.

Recommendations: **The Cabinet is recommended to:-**

- I. Note the progress in delivering affordable housing in the HRA and temporary accommodation within the General Fund.**
- II. Review and agree the updated HRA Business Plan and financial projections.**
- III. Note Overview and Scrutiny (O&S) will review the HRA Business Plan financial projections as part of the budget scrutiny process**
- IV. Agree the HRA priorities set out clearly in the report in paragraph 10**
- V. Agree that the Council will no longer issue five-year fixed-term tenancies, offering only secure tenancies following the successful completion of an introductory tenancy**
- VI. Agree that the Council will, after careful consideration, cease the Ashford Promise**
- VII. Agree that the Council will continue with the on-street purchase programme in quantities outlined in the report, recognising that 20 units will be cross-subsidised in later financial years, and set affordable rents**
- VIII. Note the Council's plans for future housing delivery as set out in Appendix B, which presents projects under way or in consultation phase, and delegate authority to the Head of Housing in consultation with the Head of Finance and IT and the Portfolio holders for Housing and Finance and IT to vary the programme as necessary**

Policy Overview: Building on solid foundations: delivering affordable homes in Ashford – our delivery plan for 2019-2023
Housing Strategy Framework Priority 1 – Improve the supply of affordable housing to meet local housing needs in urban and rural areas, and Housing Statement 2018-2023
Reform of HRA – Cabinet endorsed five key priorities for further spend, as a result of greater freedom within the HRA.
National Housing Strategy 2011 – delivering new homes

under the affordable rent model.

A Charter For Social Housing Residents – Social Housing White Paper 2020.

Financial Implications:

This paper provides an update to the financial position of the HRA over the next 30 years and forecasts that the HRA business plan continues to be a robust and viable business and is able to deliver its key priorities.

The financial model is a tool for testing existing priorities, the impact of changes in Government policies and changes in key business sensitivities to ensure plans remain affordable.

Delivery of new build Council housing is achieved using grant funding, HRA cash resources and Right-to-Buy receipts (known as 1-4-1 monies). This ensures the HRA remains able to meet its debt repayment commitments.

Legal Implications

Homes England requires the Council to enter into a formal agreement in relation to any grant funding it provides.

The Council is formally required to have a 30-year HRA Business Plan.

Equalities Impact Assessment

See attached at Appendix D. The assessment does not identify any adverse impacts on any client group.

Data Protection Assessment

Assessment on the impact on data protection will be undertaken on each individual project at the appropriate time

Risk Assessment

Risk is identified in the report itself in terms of the Business Plan. Risk assessments have been undertaken on each of the projects being taken forward within the Business Plan and risk is assessed fortnightly by officers within the appropriate teams involved in the projects. These meetings identify any implications for the pipeline of sites being progressed. Further risk assessments are undertaken on each individual project at the appropriate time.

Sustainability Assessment

Under the Corporate Plan one of the three emerging themes is 'Green Pioneer' citing the Council's ambition for carbon neutrality. The report talks about the decarbonisation of HRA stock and each project and acquisition assesses sustainability as part of its due diligence process.

Other Material Implications:

Design and construction standards will comply with Ashford spatial standards (complying with Residential Space and Layout SPD), Lifetime Homes (a standard the Council has set out for Registered Social Landlords) and Code for Sustainable Homes level 3 (which has been committed to for

Homes England purposes), and level 4 on energy.
Emphasis on the building envelope will deliver the greatest
benefits for landlord and tenant.

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Introduction and background

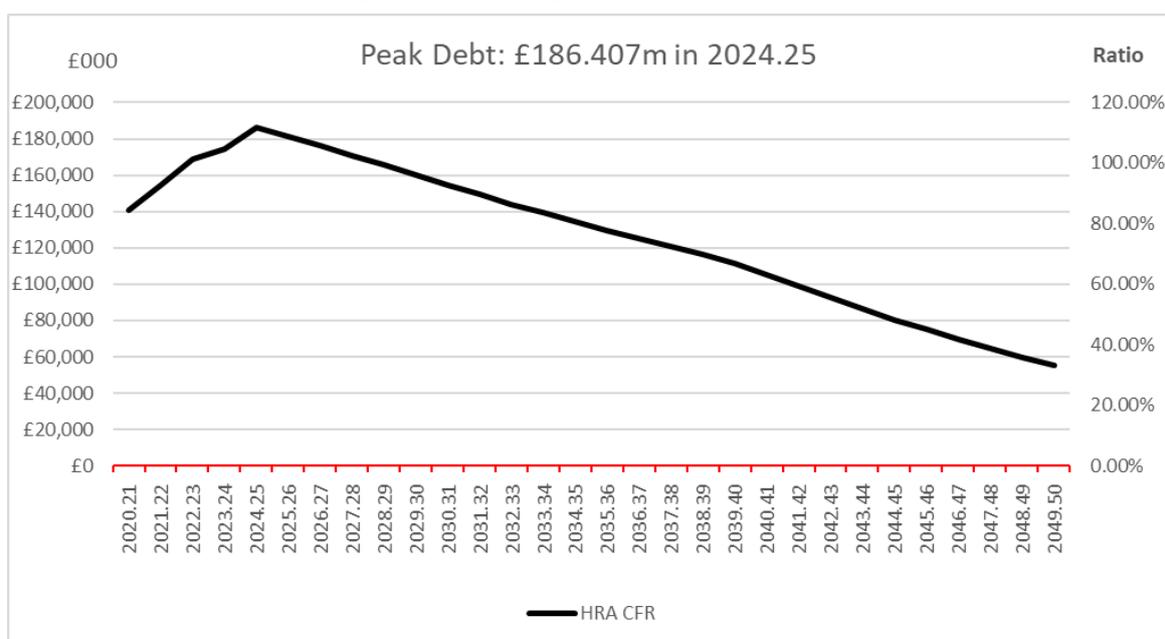
Delivery in the current climate

1. 2020 has been a challenging year. The Council has worked hard across the organisation to support vulnerable people and within its Housing Revenue Account (HRA) to ensure that the human toll on residents within its own homes has been carefully managed. This is paramount as the Council has over 400 residents within its independent living schemes. The Council has also delivered a coordinated response to ensure that the financial impacts of the coronavirus have not had an adverse impact on residents' ability to sustain their tenancies, or on its own ability to build, acquire, manage or maintain homes in its stock in the future.
2. In October 2019 members agreed a bold delivery plan for Ashford Borough Council's housing services team. Since the start of the 2019-20 financial year, using a range of tools agreed by Cabinet, the Council has built or acquired 219 homes (including the 109 to come from the 'New Quarter' building and 93 from the on-street purchase (OSP) programme, including those where offers have been agreed and are in the conveyancing process). It has also enabled 154 homes that have been delivered by registered providers (RPs) who continue to invest strongly in the borough. A further 77 homes will be built by the Council across three sites where construction is already under way.
3. The statement made by the Council, acquiring the 'New Quarter' building (where the west block will be renamed Somerset Heights and the east block Stour Heights), offering tenants the same leisure, learning, job and lifestyle opportunities as those choosing to live in private apartments in the town centre, is a sentiment at the heart of this year's HRA report. The Council's commitment to providing quality affordable housing, recognising the vital role of all keyworkers and creating housing pathways to reduce its reliance on temporary accommodation, are notable actions taken in the HRA this year.
4. Yet this report comes to Cabinet at an unprecedented time. While the HRA Business Plan remains in a strong position, the metrics alone do not tell the whole story. To get to this point, all of the Council's new-build projects have been risk assessed again to ensure that they are viable both on a standalone basis and as part of the overall Business Plan in the context of all HRA spend.
5. That such a strong programme for new-build delivery and acquisitions still exists is in part down to its flexible and competent approach to rent collection. At the beginning of the pandemic, it was anticipated that rental income could drop by 20%. In fact, despite a small increase in Universal Credit claimants, rental arrears have actually reduced by £28,000 since mid-March 2020 – a strong performance given the initial projection.
6. The HRA Business Plan is a complex model that is built using a number of assumptions. The starting point for building the model is to use the current financial year's (2020-21) estimates and forecast from that point. Built in are known items of income and expenditure along with a number of other

assumptions. These are based on historic evidence, as well as advice from experts, who have experience and knowledge in areas such as interest rates, inflation and, in the current climate, can relay anecdotal evidence of what other authorities are planning for given the pandemic.

7. As a reminder for members, the model does not allow for slippage in spend. Therefore, if there are any underspends or if timescales change then, as a ring-fenced account, any un-spent funds are placed into reserves and re-invested. Additionally, by law, the HRA must not have a negative balance, therefore it is recommended that the HRA maintains a reserve of broadly £1m through the life of the business model which was seen as prudent following previous discussions with the portfolio holder. The HRA business model demonstrates that despite dipping slightly below £1m over the first few years of the plan, the reserve target of £1m is achieved in 2025-26 and remains at that level for the remainder of the plan.
8. One of the key metrics of a sustainable HRA is the ability for the ring-fenced fund to repay its debt. Graph 1 shows the HRA increasing its debt to £186m over the next five years as the capital plans are progressed, but then the debt can be seen to track in a downward trajectory over the remaining life of the business plan model.

Graph 1 – Peak debt and repayment trajectory



9. What the Business Plan demonstrates most effectively is that there are always tough choices to be made in terms of how priorities, projects and spend are managed. It is not possible to undertake all projects at once and do everything that the Council aspires to achieve in the early years of the plan. Therefore, decisions must be made about when spend and projects are brought forward. Its priorities going forward are therefore set out below and discussed in detail.

Setting out the HRA priorities

10. This report sets out the priorities within the HRA. These priorities will ensure that the Council’s HRA delivers on key objectives in the Council’s wider recovery plan. In terms of being a green pioneer, the aim is for the HRA stock

to contribute to the Council's objective of becoming carbon neutral, encouraging sustainability in its new build homes. In terms of creating a caring Ashford, Council homes will contribute towards the borough being a caring and supportive place to live, with thriving communities and high-quality housing, creating a strong sense of civic pride. The HRA priorities are:

- Continuing to have a good maintenance programme
 - Decarbonisation
 - Compliance with the social housing regulator
 - Maximising new provision
 - Supporting the corporate agenda
11. These priorities will be balanced by ensuring that the Council is meeting the minimum requirements for compliance with building safety and the social housing regulator requirements for decent homes, allowing funds to be redirected to achieving the other priorities listed.

Continuing to have a good maintenance programme

12. In order to deliver quality housing and homes for all, it is imperative that the Council maintains the quality of its assets. The Regulator of Social Housing requires that homes made available for social rent are maintained by landlords to the Government's Decent Homes Standard, which sets out the statutory minimum standard for housing – requiring that homes:
- Are free of serious hazards (as assessed by the Housing Health and Safety Rating System [HHSRS])
 - Are in a reasonable state of repair
 - Have reasonably modern facilities such as kitchens and bathrooms
 - Have efficient heating and effective insulation
13. Keeping properties in good repair by ensuring that they are compliant with the Decent Homes Standard and ensuring that responsive repairs are completed correctly the first time they are reported are important factors. Maintaining building safety so that the Council is fully compliant with its health and safety obligations, such as gas, electrical, fire, water and lift safety is essential. These checks may need to be undertaken more frequently, particularly in buildings with communal areas to help it comply with the Local Government and Housing Act 1989 and the Gas Safety Regulations of 1998. These are points raised in the White Paper and are functions the Council performs well.
14. The Council has an in-depth knowledge of its housing stock. Stock condition is currently managed using a life-cycle replacement model and an annual validation process, where the lifecycle of over 54,000 building components is assessed. The lifecycles are based on Government standards, such as the Decent Homes Standard, guidance from professional bodies such as the Royal Institute of Chartered Surveyors (RICS), supplier product specifications and previous experience. The approach is supported by well-defined practice, which provides a guidance framework and structure to ensure that the Decent Homes Standard is met.
15. The fixtures and fittings the Council specifies and installs are of good quality. For example, bathrooms have an anticipated lifespan of 30 years and

kitchens have a planned renewal of 20 years. The products chosen are affordable, appropriate, sturdy, low maintenance and serviceable.

16. The low capital maintenance spend is due to the Council's previous diligence in meeting decent homes standards. Its homes remain in a good condition and the replacement time of some elements can be extended if their condition still meets acceptable standards. Where the condition of the components due for replacement are in good or serviceable condition, the replacement date will simply be rescheduled for a future year. This approach minimises unnecessary expenditure while ensuring the quality of our properties and freeing up money to support other areas within the Business Plan as a whole.
17. To build on this further, the Council intends to undertake a survey of its assets in the 2021-22 financial year. This will ensure that it is able to understand any changes to its estimated costs and scheduling of planned works. It will also enable a greater understanding of the measures needed to meet new compliance rules and objectives around decarbonisation. The anticipated cost of this survey is accounted for within the Business Plan and the most efficient method for undertaking the survey will be determined shortly. The combination of rigorous information sets and the additional survey work will ensure that individual property records are updated accordingly.

Repairs

18. The Council's responsive repairs team supports the allocations process and plays a pivotal part in the buy-back work stream by ensuring that properties are safe and secure, meet the Decent Homes Standard and the Council's property-letting standard. Additionally, the repair service ensures the Council complies with the Right to Repair, Disrepair and Homes (Fitness for Human Habitation) Act 2018. The team provides a 24/7, 365 days of the year emergency repairs service with a target attendance time of two hours – night or day. It undertakes around 10,000 repairs a year and is considered by the majority of Council tenants as their most valued service.

Decarbonisation

19. Last year members were advised that in order to ensure the HRA took appropriate steps towards carbon neutrality a 10% additional sum had been added to the cost of the Council's new build schemes. The aforementioned survey of Council assets will determine the amount that it will cost to work towards decarbonisation in the HRA stock.
20. This is a challenging but vital strand of work. In line with the Social Housing White Paper, the HRA seeks to move towards a position where all of its homes achieve an Energy Performance Certificate (EPC) 'C' rating. Currently there is no requirement for Council properties to have an EPC unless there is a new tenancy or it undertakes works that may change the EPC assessment. Currently 50% of Council homes do not have an EPC and 4% of homes have a grading of 'E' or lower – these homes generally are off-gas and have solid fuel or electric heating.
21. The Social Housing White Paper states that homes contribute 14% of all UK greenhouse emissions. The Council is committed to playing its part in reducing carbon emissions through its housing stock. The White Paper also suggests that the Decent Homes Standard will be reviewed to consider if it should be updated (and probably upgraded), including how it can better

support the decarbonisation and energy efficiency of social homes, and improve communal and green spaces around them. It is therefore likely that Government expectations will increase as we strive to hit our own targets.

22. Improving the energy efficiency of its properties is an integral part of maintaining the Council's stock to a reasonable standard. Energy efficient properties ensure residents' homes are warm, easier and more affordable to heat, which has positive benefits, particularly to those in fuel poverty. The Council's aim is to create an energy model that will allow it to complete an analysis of its homes and identify those homes that will require investment above the current 'fabric first' approach and also those homes that will struggle to achieve energy performance standards and will require more detailed appraisal work.
23. 'New' technologies, such as solar PV and heating panels, air source heat pumps, mechanical heat recovery systems and battery storage systems receive a lot of media coverage, as do major retrofit approaches, such as a whole property or multiple property approach. While many of these solutions are likely have a part to play in improving a property's energy efficiency, they often involve expensive and invasive installations that can be difficult to fund or justify their cost benefit.
24. The Council's planned approach is to categorise its properties in around 450 archetypes for which it will complete a 'SAP' assessment. The Standard Assessment Procedure (SAP) is how the Government assesses and compares the energy and environmental performance of buildings. The Council will then create a costed carbon reduction plan for each archetype based upon the efficiency measures available, to reduce its carbon footprint and achieve its target of a minimum EPC rating of 'C'.
25. This approach will enable the Council to project the results to its whole stock so that every property has a costed carbon reduction plan, selecting the most appropriate measures for each property archetype and understanding the contribution and cost of each measure and, furthermore, its effectiveness.
26. The Business Plan supports an increase in the annual planned maintenance programme, which ranges between £5m and £7m per annum over the next five years. This increase partly includes some higher specification works, which support the carbon neutral agenda. The Council will also be discussing this wider agenda with colleagues in the Kent Housing Group. It will also maximise opportunities to bid for additional resources to support this agenda as and when they arise. In addition we will consider how the measures installed impact upon the tenant and explore how charges to the tenant may be considered against electricity usage to offset costs. Discussions are taking place with Engie, our current repairs contractor to review the possibilities and options available in this context.
27. It is important to note that this is an area that will need to be kept under careful review as our data sets are developed. By the time we review the Business Plan next year the aim is that we will have more robust information to understand the costs of decarbonisation and can refine our initial projections regarding the impact upon the plan.

Compliance with the Social Housing Regulator

28. This report is presented to Cabinet following the publication in late November 2020 of the Government's long awaited White Paper "*The Charter for Social Housing Residents*", which sets out its plans for social housing. It contains several strands that permeate throughout this report. In short, the Council is comfortable it can meet all requirements of the new Social Housing Charter for tenants, though tenant engagement is an area that needs more attention.
29. The document states that Government will work with the Regulator of Social Housing to create a stronger requirement for landlords to be transparent about their performance, the decisions they make that affect their tenants, and how effective their overall engagement with their tenants actually is. The report also looks at safety concerns following the Grenfell disaster and addresses how complaints are made to the Housing Ombudsman.
30. Residents, where possible, will be encouraged to purchase their own homes, including through a new shared ownership model, though the right for tenants to acquire a Shared Ownership lease of their current property extends only to housing associations at this time.
31. Ashford Borough Council is absolutely committed to helping those living in its homes achieve what they want to achieve. This is why it is so important that people registered on the housing waiting list have access to homes in all parts of the borough – both in the town centre, and for those in rural areas. This integration is pivotal to creating cohesive communities – with one example in the borough being the way in which all residents have bonded on the TENT1 developments. With access to new homes in the town centre being given to keyworkers who have played a vital part in helping Ashford's economy through the height of the pandemic and into the recovery phase, life chances are being offered that see no one disadvantaged.
32. The White Paper and, within it, the new Social Housing Charter for residents is to be welcomed. As the Prime Minister states in his introduction to the White Paper, in levelling up the country and making it fairer for everyone, this must include making sure social housing tenants are treated with the respect they deserve. The Government believes that offering residents choice, and providing them with the highest level of customer service is therefore a priority for social housing landlords.
33. The Social Housing White Paper demands that tenants feel empowered and are involved or at the very least informed about spending decisions. It also stresses that tenants have a voice and an opportunity to challenge decisions. Complaints processes must be fair, and a 'responsible person' should be appointed who will ensure that the Council is complying with the regulations. Furthermore, a path is required to be clearly delineated for residents, so they know how to approach the Housing Ombudsman if things go wrong. The Paper states the best landlords engage well with their residents and listen to them with respect. While the Council already has a clear and robust complaints process, a review of this area is under way using the Government's suggested self-assessment tool, and any areas that require attention following this process will be addressed in order to ensure that we meet the regulator's expected standards.
34. There is a possibility that the Council could be inspected more regularly as the White Paper says the regulator can inspect larger social landlords every four years. It remains to be seen whether the Council will fall into this bracket.

Rent standard

35. In addition to maintaining homes well, the White Paper demands that social landlords look at how they set their rents. In April 2016, during the height of austerity, rents were reduced by 1% per annum for a period of four years. This was good news for tenants but a setback for the Council's development programme with East Stour Court, which was earmarked for remodelling at the time, only now on site as priorities were forced to change with limited resources. To help mitigate the reduction in rental income, based upon previous investment, the Council's repairs and maintenance investment was also reduced by £6m for the four-year term, though despite this the decent homes standard has been maintained.
36. A revised rent standard, in place since April 2020, has enabled the Council to return to an annual increase of CPI + 1% for at least five years. From the 2025-/26 financial year the HRA Business Plan assumes a more modest increase of CPI + 0.5%. The Council will monitor the economic context in the next year to provide a stronger basis for these assumptions going forward and assess next steps.
37. The Council's approach remains to seek to deliver 'affordable' rents (in this instance up to 80% of market rent) but as close to social rent (60% of market rent) as is viable within the Business Plan to ensure a return on each project. Rents set on the Council's own developments differ to those set on the OSP programme as there is a variation on the amount of grant awarded. Homes England have endorsed this approach and grant funding remains available within its 2016-21 programme that will enable schemes to be delivered by an extended deadline, due to the pandemic, of March 2022.

Management of the stock

38. Of course, as more homes are introduced into stock, it is important to ensure that there is appropriate resource to manage these homes. The Social Housing White Paper actually points out that residents in social housing are more likely to experience antisocial behaviour and states that tenants have a right to feel safe in their homes, without the stress, fear and tensions that anti-social behaviour and crime can cause.
39. The Council has boosted the resilience of its management function with the creation of the post that will manage the 109 'New Quarter' units. This post will initially be based in the building and over time, once all residents have settled in and any snagging matters have been resolved, the post holder will gradually manage more homes, while retaining the block as part of their 'patch'. With each neighbourhood management officer ordinarily actually having around 800 units to look after, it will be necessary to blend the New Quarter officer back into the wider team following the settling in period to redistribute workloads more evenly among the team.

Providing effective services

40. The Council does, and will continue to provide effective services. It will set out how it has performed in an annual review for tenants, detailing metrics based on the key points raised in paragraph 29. These tenant satisfaction measures will be the barometer for how the Council is performing.
41. This shift is important because the White Paper suggests that stigma is one of the biggest obstacles that must be overcome. This stigma manifests itself in many ways. Often, affordable housing is easily distinguishable on a new-build

site from the open market housing, or put in one section of a development. This visual trigger can lead to corrosive behaviours.

42. Residents in Council homes should receive the same high quality of customer service as those not living in social housing. This is something the Council's housing services team prides itself on but it will continue to proactively promote stories of cohesive communities to prevent misconceptions that lead to tenants feeling as though they are second class citizens.
43. The Social Housing White Paper says it is vital that social housing is treated as an integral and valued part of the housing system, rather than being separated or segregated from other forms of housing. That aspiration is reflected in the National Planning Policy Framework which states that planning policies and decisions should aim to achieve healthy, inclusive and safe places. It also emphasises the need for planning policies and decisions to promote social interaction and provide shared spaces and facilities.

The Ashford Promise

44. With a shifting housing landscape, it is considered right to evaluate the effectiveness of the Ashford Promise, introduced in 2014, and the issuing of fixed-term tenancies, issued by the Council since 2013.
45. The Ashford Promise is a system that introduced a policy of offering different service levels to tenants based on the conduct of their tenancy. Those in full compliance with their tenancy conditions were to be eligible for our full range of services while those in some form of breach were only to receive a reduced, statutory minimum service. However, while it was an initiative that was felt to be worth implementing when it was introduced, it has not delivered the anticipated results and has not achieved what we wanted it to.
46. The key principle of the 'Ashford Promise' was seeking to achieve a better landlord-tenant relationship, where the tenants more fully understood that to be eligible for works such as improved kitchens and bathrooms, they must be fully compliant with their tenancy conditions, including pre-paying their rent. The theory was that in achieving that aim, not only would the Council improve its income levels (which remain at a very high percentage compared to all other social landlords) but do so in a way that made Council tenants better understand their obligations.
47. The housing team has progressed greatly since the scheme was implemented and thinking among other RPs who offered something similar and the national Government has led to this careful evaluation. With an established rent arrears area managers' team and an estates area managers' team, aided by housing management support officers, a much more targeted and specialised approach to dealing with antisocial behaviour and rent arrears separately is now undertaken. This was not in place when the Ashford Promise began and was introduced after a review of the Housing Service in 2016.
48. To illustrate the point, in some instances where the Ashford Promise has been invoked and tenants have not had their planned improvements undertaken, it has made no difference, with the tenants still in arrears. In other cases, rent arrears have been cleared but have soon fallen back into arrears and those arrears continue in the long term, with the tenant falling back into arrears within six months. It is therefore more sensible for the Council's rent arrears officers to work with the tenant to assess any issues behind this rather than penalising the tenant further.

49. The planned maintenance team would also benefit from not having to rearrange one-off bathroom and kitchen refurbishments when a tenant is put back into the scheme. The logistical and financial cost of sending back a contractor to complete a refurbishment once they have left the area is significant and in many cases is often greater than any increased revenue from the increased collection of rent. The housing team now uses new tools to support tenants so they have successful tenancies, rather than face sanctions that do not help build thriving communities or reduce stigma.
50. In short, the Council should not reward tenants for adhering to their tenancy agreement; it should be expected of them. Members are therefore recommended to acknowledge that though the programme has been extensively tested, after a robust appraisal of the scheme, the Ashford Promise should be ceased.

Fixed-term tenancies

51. While there was considerable merit in introducing five-year fixed-term tenancies, it is now believed that the Council should follow the spirit of the Social Housing White Paper, and the Green Paper before it, as well as the lead of RPs, and only issue lifetime secured tenancies, following an introductory period.
52. Originally fixed-term tenancies were introduced in the context of the Localism Act 2011. The Council offered tenancies for a fixed term with a view to reviewing that household's need at the time the tenancy was due to expire, with updated circumstances determining if the tenancy was to be renewed or the household obliged to then seek a private sector housing solution.
53. Secure lifetime tenancies have continued to be offered where the circumstances of a household were unlikely to change over time, for example older people and vulnerable households moving to a home that should be suited to their long-term requirements.
54. While it is fair to say that fixed-term tenancies provide the opportunity to balance a tenant's requirements for stability and affordability for the long term, this is outweighed by the need for tenants to feel secure in their own homes.
55. The evidence the Council has, and that it has gained from other housing providers, is that fixed-term tenancies are not working and actually contradict the aims of the White paper, in reducing the stigma associated with a tenant's longstanding place in the community. The Government had originally planned to end secure lifetime tenancies as per the Housing and Planning Act 2016 but this decision has been reversed.
56. Conversations held with members of the Kent Housing Group (a group of local authorities and RPs who operate in the county) and the Chartered Institute of Housing have shown the desire for many providers to revert to offering secure lifetime tenancies. This gives stability for families and their children's schooling. It also plays a part in celebrating thriving communities.
57. Fixed-term tenancies appear to act as a barrier to mobility with residents not wanting to lose their security of tenure, rather than aspiring to move onto private rented accommodation or shared ownership. It is important that the Council shares the Government's determination to tackle social stigma by ending fixed-term tenancies and continuing to develop and acquire new tools to help our tenants thrive and build successful communities.

58. During their implementation, the Council has ended a small number of fixed-term tenancies. Members will be reassured there are no proposals to remove introductory tenancies and that tenants will be issued with introductory tenancies still, so that behaviour can be monitored during the initial stages of a tenancy, and that those tenants not under a notice of seeking possession will be transferred to secure tenancies by the end April 2021.
59. This move to no longer issue fixed-term tenancies is at the Council's discretion and does not need further consultation. Members are therefore recommended to agree that the Council will no longer issue fixed-term tenancies and will support people in putting down firm roots in communities.

Digitalisation

60. The Council continues to seek innovative ways to engage with tenants and the Pandemic has really heightened the Council's ability to adapt – for example, using electronic signature software, YOTI (Your Own Trusted Identity), which is the corporately chosen app for electronic signatures. This has been successfully introduced where electronic signatures are required for tenancy sign-ups, and has been agreed with the Legal Team.
61. Furthermore, with viewings tough to undertake within social distancing guidelines and without PPE, officers have been undertaking 'virtual viewings' – using a 360 degree camera to indicate the size and layout of the home on offer. These have been welcomed by residents and have not slowed the void process in any way. This work will continue and is actually being undertaken for the acquisition of the 109 units at the "New Quarter", where several videos are being produced to illustrate the various alternative layouts on offer.
62. The Council has already achieved significant digitalisation of the majority of its forms, which can now be completed online for customer ease using Abavus. Other strands of work that will enhance customer experience are based around the way in which the housing service manages its documents, its repairs appointments and reporting systems, and the way tenants can make payments. Mobile working has improved for officers in the housing team too. Crucially, going forward the way in which it records customer feedback and requests will also be developed. Customers expect services to be delivered in this way and the Council must, and will, deliver.

Maximising new provision

The On-Street Purchase Programme (including 1-4-1 monies position)

63. The Council has been able to devise safe working practices to continue with its ambitious OSP programme, which has accelerated since May 2019. Formulated as a means to both increase housing stock (as outlined in last year's Cabinet report) and use right-to-buy (RTB) receipts, known as 1-4-1 monies, before they have to be repaid to the Government after three years with 4% interest, the programme has succeeded in adding to stock numbers.
64. The OSP programme largely works as the 1-4-1 monies act as a subsidy to support the viability of each individual purchase, funding around 30% of the cost. Each property needs to offer a sensible rate of internal rate of return (IRR) so that they do not affect the overall Business Plan when bought in large quantities. Current projections show that RTB receipts are more than on track to be spent by their deadline, although officers will continue to monitor

this on a regular basis. It is likely that the Council will have spent the available 1-4-1 monies by the beginning of the 2022-23 financial year.

65. The target of around 75 homes per year, as noted by members last year, will therefore be set to a more modest 50 for the next five financial years – with circa £10,000,000 set aside in each of those financial years for the OSP programme. This uses up the 1-4-1 monies more slowly while still adding to the stock levels in the HRA.
66. The average number of RTB sales is around 25 per annum (this may fall as a result of the pandemic). This number of sales can be used to support 'grant' funding for around 30 OSP properties but due to other successful projects within the HRA we could choose to subsidise a further 20 OSPs without affecting the overall viability of the Business Plan as a whole.
67. At a time when the Stodmarsh wastewater nutrient issue is causing some concern about the Council's ability to obtain planning permission for its own new-build homes, having a mechanism in place to deliver these individual acquisitions in good numbers is vital. In view of this it is proposed to set a target for OSP of 50 homes per annum.
68. This is a number that will not only negate the number of homes lost to RTBs but will ensure the Council can reasonably prioritise rehousing those in temporary accommodation into these homes, which will create movement in our stock and will continue to reduce dependency on paid-for nightly accommodation that puts financial pressure on the General Fund.
69. Since the beginning of the pandemic, when the OSP programme was risk assessed, the Council took the view that street purchases should only be acquired at social rent levels (in this instance around 50% of market rent) – to ensure that the rent will be genuinely affordable for residents. This has also had an adverse impact though, as with a small IRR and lower rents being set, the properties – in the volume that they have been acquired – have added a little pressure to the Business Plan. Therefore, in light of the need to make sure all properties meet individual viability targets, taking into account carbon goals and delivering an IRR of around 2%, the Council now needs to set rents at affordable levels (in this instance around 60% of market rent). The aim is always for OSP rents to be set at the lowest rate possible to meet viability.
70. Setting rents at this level should ensure that properties are not beyond the affordability of tenants, nor should it hamper collection rates. It will actually enable the Council to continue to acquire 50 units per annum.
71. Members are asked therefore to endorse the Council's approach of acquiring 50 OSP programme homes per annum within the HRA at affordable rents, taking into account the fact that some of the purchases will need to be fully funded by debt. The acquisition procedure for OSPs will remain as per that agreed by members in the October 2019 report, with delegated authority (as long as purchases fall within the agreed financial annual limits set in paragraph 65) for all purchases to be approved by the Head of Housing after consultation with the Head of Finance and IT). If the financial annual limit set would be exceeded by a proposed purchase, then prior consultation will be required with the Portfolio Holders for Housing and Finance and IT. However this target will be kept under review and we will seek to reduce the number of OSPs in future years as the delivery of new housing provision increases to help meet demand.

72. While the RTB scheme has been a long-term success in enabling tenants to acquire their own home and get on the housing ladder, members may be interested to know that the Council will be lobbying Central Government to reform the scheme to enable it to continue to accelerate deliver and spent the receipts wisely.
73. The following graph illustrates the spend profile of 1-4-1 receipts (green shading) against the spending requirement which is represented by the black line. The graph shows the impact of the OSP scheme, which is utilising receipts ahead of need. The expenditure flatlines in five years as no usage has been allowed for in the model. As the plan rolls forward the requirement to spend 1-4-1 receipts will be kept under review and plans will be developed to utilise these receipts accordingly. This could include further extension to the OSP scheme or use of receipts for redevelopments if Government grants are harder to source, through demand for Homes England's 2021-26 programme.

Graph 2 – Spend of 1-4-1 monies



New-build affordable homes programme

74. The aforementioned nutrient issue at Stodmarsh does not impede the progress of any homes with planning permission already in place. Phase 6 of the Council's new-build programme therefore continues at a strong pace, alongside its independent living programme. The schemes at East Stour Court (delivering 29 units of independent living accommodation) and the former Poplars site (which will be renamed Berry Place and will deliver 31 units of independent living accommodation) are well under way. As both sites were at an early groundworks stage during the initial lockdown progress has remained relatively on track, with social distancing not being an issue and no issues being reported with supply chains or materials. Both build projects have been successfully awarded grant from Homes England's 2016-21 programme, totalling a combined £2.5m.
75. The construction of Halstow Way (delivering 17 units of general needs accommodation) began on site in October 2020 and a grant bid has been submitted to Homes England for this site. Christchurch Lodge has delivered eight units of short-stay temporary accommodation to complement the facility at Christchurch House. This will relieve some of the pressure on the General Fund (which will manage the units) by reducing the Council's reliance on paid-nightly accommodation and creating housing pathways. This is evidence that the HRA can play a wider, proactive role within an authority.

76. In terms of its future build programme, the Housing Services team thanks those ward members with whom it has spoken about proposed new schemes in their wards or changes to previous plans. Their interaction, feedback and understanding of the need to hold consultation events online in the pandemic has been greatly appreciated. Appendix B details the projects under way on site and those that have been consulted on to date. There remains scope for additional projects but these must be selected carefully in order to retain a balanced HRA Business Plan.
77. Other sites have been approved for further investigation by Cabinet members at previous meetings (in exempt appendices) and are factored into the HRA Business Plan and financial modelling. Details of these schemes will be released into the public domain once community consultation events begin. Please note that parish councils and ward members will have been consulted before this point, a responsibility the housing services team takes seriously.
78. Members are recommended to agree that the Council's affordable homes programme can be varied as necessary by the delegated authority set out in Recommendation VIII based on site-specific financial and logistical factors.
79. Further to the projects on site, a strong pipeline of delivery has been established and this is detailed in Appendix B. Community consultations have been ongoing during the last few months on sites in the borough – these being Oakleigh House in South Ashford, 55 Mabledon Avenue in Willesborough and Harper Road in South Ashford. Further consultations are to follow on a range of infill sites and other developments and the Council is in discussions with parish councils and ward members about these sites.
80. The Council remains adaptable in terms of how it utilises available funding. It will continue to bid for funding from Homes England's 2021-26 affordable homes programme (for which £7bn is available outside of London) and, where it spent 1-4-1 monies in acquiring the former Piper Joinery site, it will use £1.4m of RTB receipts to deliver this project, currently out for public consultation. Given the land was originally acquired using RTB receipts it cannot now be mixed with Homes England grant.
81. One aspect of increasing delivery is the development of a range of 'house types' – in a similar way to which developers have in their armoury. The Council is keen to have different house types that it has available to use – these would mean that when land was purchased, it would be simple to know that X 'house type A' homes, X 'house type B' homes and so on would fit on a site. This would aid viability calculations. This is a work in progress within the development team across different departments. However, while a degree of uniformity to keep costs down so that not every site requires a bespoke build is welcome, the Council must make sure its homes blend in with the surrounding streetscape, thus helping to eliminate the stigma of social housing for its tenants by the way the homes look.
82. With reference to the work required by the Social Housing Regulator in terms of making homes meet the Decent Homes Standard, the Council makes residents feel secure and uses development to help tackle anti-social behaviour, designing out any issues communities face as it has done effectively on some of its previous infill developments. Its independent living schemes have delivered ways of living that combat isolation and, as a result of the pandemic, there is an awareness that it must enhance or reprovide green space surrounding its schemes where possible. Space standards

remain important to the Council and we pride ourselves on upholding the Council's rules on internal and external spaces.

83. Therefore, the Council's new provision maximises both the number of homes that can be delivered on its sites and with its available resources, as it funds each project leveraging in the maximum amount of subsidy. It delivers a holistic solution – benefitting maintenance teams by installing systems that are easier to maintain, building homes where the stock can be managed easily, where they are needed and where there are amenities available for residents. Additionally, the way that the sites are allocated is also addressed – developing local lettings plans where required, allocating to those with an identified local need where appropriate.

Building Information Modelling

84. Housing, maintenance and corporate property teams within the Council are working closely together on new HRA developments with contractors to look at building information modelling (BIM). This is a way of better managing information flow on project development, planning ahead, frontloading information into the project so that briefs are clear and ultimately carried out on time to specification. A digital version of an operating manual can also be produced, which provides all of the information about a new building in a multi-dimensional model.

Homes delivered by the Council

85. Though the Council mainly delivers affordable and social rented homes, it has delivered shared ownership units on occasions where, as endorsed by members in the Council's affordable housing delivery plan, it has acquired s106 homes on small rural sites. Sometimes if RPs have no stock nearby will not be keen to take on these units. The Council, therefore, steps in. The Council prefers to deliver additionality but it steps in so that these homes are not lost – as a commuted sum (which is the alternative) does not deliver a home there and then. As a small revenue raiser, the Council has offered to manage units for some RPs interested in small rural sites.
86. Some of the entries listed in Appendix B indicate that the homes have been acquired through s106 agreements. Where this is the case, these were offered with an entry level of 25% and were sold via a local agent at shares ranging from 25% to 40%. The Council enjoys a good rapport with all local agents based on its OSP work detailed earlier in this report.
87. Furthermore, in the same Appendix, Jubilee Field and Calland are listed, which both had four properties on their respective sites. Jubilee field saw two allocations to people with a connection to Wittersham and two allocations to people with connection to adjoining parishes, while Calland saw three allocations to people with a connection to Smeeth and/or Brabourne (these two parishes are very close to each other) and one allocation to a person with a connection to an adjoining parish. All allocations were discussed with parish councils prior to offering.

Additional work by the development team

88. In addition to accelerating delivery and increasing numbers, part of the role of the Council's development team is to make the best use of its available stock. This sees it working on identifying homes for those with complex needs, or who are over or under-occupying. It also works with colleagues in the

department to provide an adequate programme of disabled adaptations to meet the needs of disabled tenants within a reasonable timeframe.

89. Mutual exchanges are an effective way of tenants moving to accommodation more suited to their needs. They maximise the use of the existing stock. Often those people looking to move are needing to do so due to changes in their family size, requiring more or less bedrooms. Between 3rd February 2020 and 28th September 2020, 30 households completed a mutual exchange, and nine of these rightsized – i.e. moved into a home more suited to their family size.
90. Homeswapper is a database where tenants can advertise their homes, at no cost to themselves, and search for properties that meet their own requirements. This proactive approach places the control back with tenants in trying to address their own housing need and is often a much quicker route than bidding through the housing waiting list.
91. Currently work is being completed to ascertain whether it is beneficial to extend the assisted move programme to those looking to rightsize through a mutual exchange. The assisted move programme provides support and financial incentives to those over 50 leaving family-sized accommodation. The incentives can include up to £1,000, removal costs and post redirection. By extending the scheme it is hoped it will encourage more people to downsize to allow those families currently in overcrowded accommodation to move into homes that they desperately require, thus making our stock more resilient and offering new starts for our residents.

Enabling

92. Around half of all new affordable homes in the country are delivered through developer contributions, and are negotiated as part of the planning system (in the form of Section 106 planning obligations). The Council enjoys a strong rapport with the RPs who serve the Ashford borough and continue to invest here in good numbers. A quarterly forum is held with representatives of RPs – these have continued during lockdown, in addition to one-to-one meetings.
93. It should be mentioned that the Council's inward investment programme, with multiple major projects being delivered, continues to attract RPs to invest in the borough. It is central to the plans of RPs to know that the Council remains proactive, that businesses continue to invest here and that there are job, leisure, lifestyle and learning opportunities for those who want to live here.
94. The Council continues to explore innovative ways to deliver affordable housing. It continues to work with an incorporated community land trust (CLT), play an active part in discussion forums and continues to look at how it may deliver homes in partnership with RPs through a housing delivery framework. This would see it working in tandem with an RP to deliver out sites that may be too large to deliver on our own. Backed by the delegated authority on land acquisition afforded by members last year, the Council hopes to get this project under way during the next 12 months. The Council continues to explore other possible methods of bringing forward affordable housing. These innovations will be reported to members in due course if headway is made.

Supporting the corporate agenda

95. The Council's commitment to aiding the General Fund through the delivery of temporary accommodation facilities remains strong. The housing team is currently undertaking research into possible sites that will increase the

Council's ability to house those to whom it accepts a homelessness duty while reducing reliance on expensive paid-nightly accommodation that puts a pressure on the General Fund. It is looking to use modern methods of construction to hopefully cut the delivery time for this project once it reaches site – subject to planning permission. More details will be made public soon.

96. Of course, the aforementioned OSP greatly supports the wider corporate agenda as it enables housing pathways to be created and provides higher resilience in the temporary accommodation at the Council's disposal.
97. The Council is also addressing its decarbonisation goals, as referenced in earlier paragraphs. It is also committed to the place-making agenda – making Ashford an attractive place to live for everyone. Remodelling its stock is a key part of this vision and this work is continuing apace.

Other Business Plan assumptions

Inflation Forecast

98. Inflation is a key sensitivity in any financial modelling; the HRA financial model applies a number of assumptions to costs and income items in the budget.
99. Inflation assumptions have been updated in the model to reflect the actual September 2020 figures as published by the Office of National Statistics and are then forecast for the remainder of the model using the Bank of England (BOE) target of 2% as a benchmark for the Consumer Price Index (CPI).

Interest Rates and the Amounts that are Set Aside to Repay Debt or Invest in Future Capital Projects

100. The vast majority of the HRA's current borrowing was taken out at fixed rates and therefore is protected from interest rate risk. Future borrowing requirements will be assessed at the time of need in conjunction with the Council's Treasury Management Advisors Arlingclose.
101. The model assumes the authority will use HRA balances to repay additional borrowing where it can, while holding a reserve balance of circa £1m for the life of the plan.

Other Assumptions Included in the Model

102. Following discussions with councillors, work on play areas is due to commence in 2021-23, the business model has allowed £60,000 per annum (inflation linked) for these works. There is discussion with the Culture team at this time about the programme being brought forward and this will be reflected in the Business Plan once discussions have been finalised.
103. The model makes the assumption that the remaining PFI stock is returned to housing at the end of the 30-year contract. This is over a decade away and though early preparatory work is being considered, further plans will be shared with members in subsequent reports.

Risks to the HRA Business Plan

Implications and Risk Assessment

104. The Business Plan financial projections continue to be viable and include the current spending commitments. Each new-build project is assessed for its

own individual viability and the effect its inclusion within the Council's affordable homes programme has on the Business Plan overall.

105. As the Business Plan is built over a 30-year period it is inevitable that Government policy will change. The current model is based on the current regulatory framework. In the event of any material changes to this framework the Business Plan will need to be reviewed. Members may note that the debt, as presented in this year's report, has stretched out beyond the life of the business model, compared to last year, as a result of modelling the New Quarter acquisition over a 40-year period.
106. Other risks to the Business Plan include variations in costs, for example, capital repairs and maintenance may be higher or lower than anticipated, which over the life of the Business Plan, could have a substantial impact. In addition to this, inflation is also a risk, which not only affects materials and contractor costs in the supply chain but also rental income, for which increases are based on CPI. The reality is that these risks are difficult to quantify exactly but the Business Plan will be adjusted as and when impacts of increases or underspends are known. In relation to our own stock, the position will be refreshed after the stock condition survey.
107. Interest rates are a risk to the model especially although with much of the debt at fixed rates this risk is largely mitigated. It is necessary however to ensure that new developments are appropriately appraised using current rates to ensure schemes are financially viable. The accountancy team monitors interest rates and appropriate borrowing strategies will be made to mitigate risk where possible.
108. The on-going introduction of Universal Credit leaves the HRA business plan open to a degree of risk, in particular, to the Council's dwelling income. This risk is one that is being managed by the work being done by the housing team, although with the impact of Covid-19 yet to be fully realised, this will need to be carefully monitored.
109. The Business Plan model includes a number of sites, as detailed in Appendix B to this report. However not all sites have completed a legal conveyancing process or been given planning consent, which puts completion at risk until there is absolute certainty over their delivery. To reduce this risk, alternative sites will be sought to ensure a steady pipeline of delivery comes forward. Nonetheless some may fall away reducing the delivery commitment. The Council's housing services team measures the sites underway and the pipeline of sites in design and early consultation as a mechanism for ensuring that its key performance indicators (KPIs) are met.

EU Exit

110. The UK will be leaving the European Union on 31st December 2020, and the potential impact of Brexit is still unclear. However, work is being done on this corporately to determine any local impacts on how the Council operates. However, from a business planning perspective, officers will continue to heed the advice from the Council's treasury advisors and ensure the Business Plan is updated in line with any advice going forward.
111. It is thought that the main risks at this time could be in relation to the labour force (primarily for the Council's contractors), and additional costs arising through currency fluctuations. Likewise, there may be a reduction in the availability of materials. If so, costs could increase. It should be pointed out

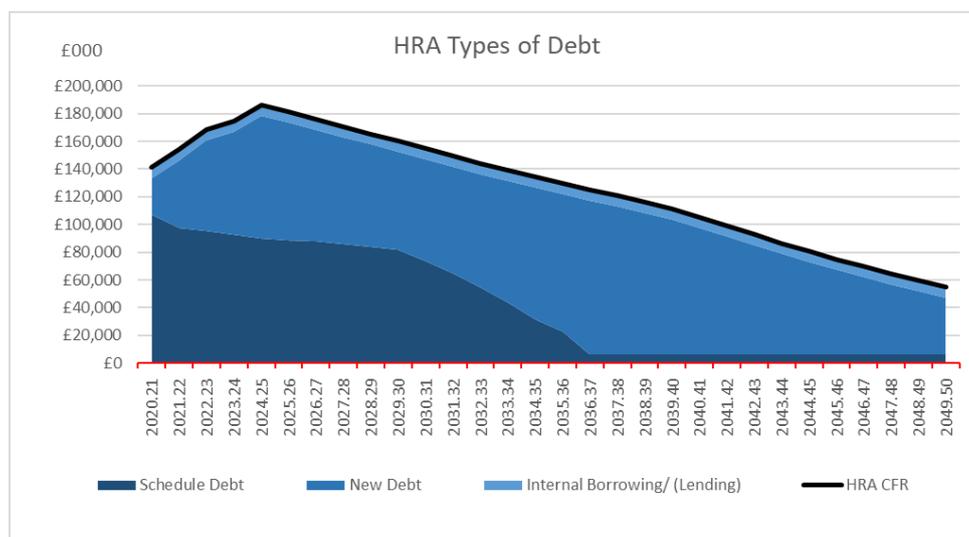
though that after the first lockdown the only shortage of materials reported among developers were plaster and plasterboard – and with our projects in the early stages of their build process, this did not affect our projects on site.

112. Officers will continue to review these issues and will liaise with members should mitigating action be needed, such as delaying projects to ensure the Council has the resources available. The HRA priorities will be reflected in corporate brexit risk management plans.

Modelling Outcomes

113. The model shows that the HRA is balanced and sustainable throughout the 30 years projected. The model allows the HRA to meet the cost of day-to-day management and repairs, and investment in the projects detailed at Appendix B and the OSP programme.
114. A table illustrating the model for the first 10 years of the business plan is attached to this report at Appendix A and details the cash inflows and outflows for the HRA, providing an estimated HRA balance at the end of each year.
115. The model is based on the assumption that the Council will be repaying debt, although the current debt forecast goes beyond the life of the model (as explained above) and will be settled around 2062-63 if you followed the trajectory down. While this is not a problem at present, the prolonging of the debt will need to be monitored in future models.

Graph 3 - Amount of HRA Debt Held (values shown in £000's, year 1 – 2020-21)

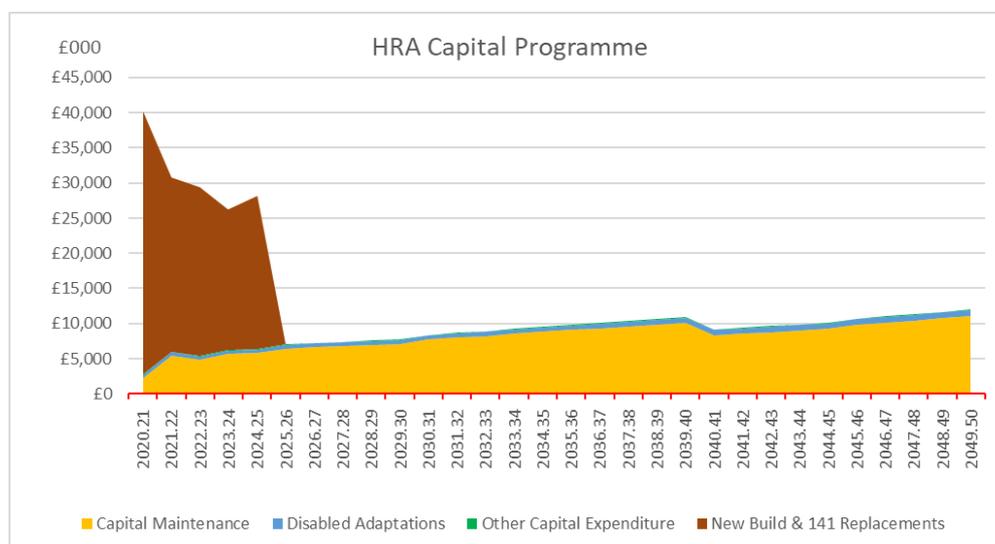


116. Graph 1, above, shows the HRA CFR (the Capital Financing Requirement is a measure of the level of debt needed) for the life of the HRA Business Plan and how it is made up. The current debt portfolio (shown in dark blue) reduces over time, whereas additional borrowing is taken out, not only as the existing loans mature, but also to facilitate the planned projects.
117. The HRA debt peaks in 2024-25 at around £186m to facilitate the capital programme, despite making significant repayments the model still shows a residual balance of £55m at the end of the model. Members are reminded that the reason for this is that the plan, as far as is possible, deals in certainty, and therefore in terms of expenditure on acquisitions and new-build sites, the Council only projects forward for the next five financial years. There is

capacity within the Business Plan for other project sites to be identified but their inclusion in the plan going forward will need to be carefully assessed.

118. The profile of debt (as shown in Graph 3) is based on the current, known projects; this could change in future, depending on proposals and variations to the build programme, projects that are not yet included in the model, or any changes in priorities, as agreed by Members. This is a flexible approach, which will be monitored as new projects are considered and approved.

Graph 4 - Capital Programme (values shown in £000's, year 1 – 2020-21)



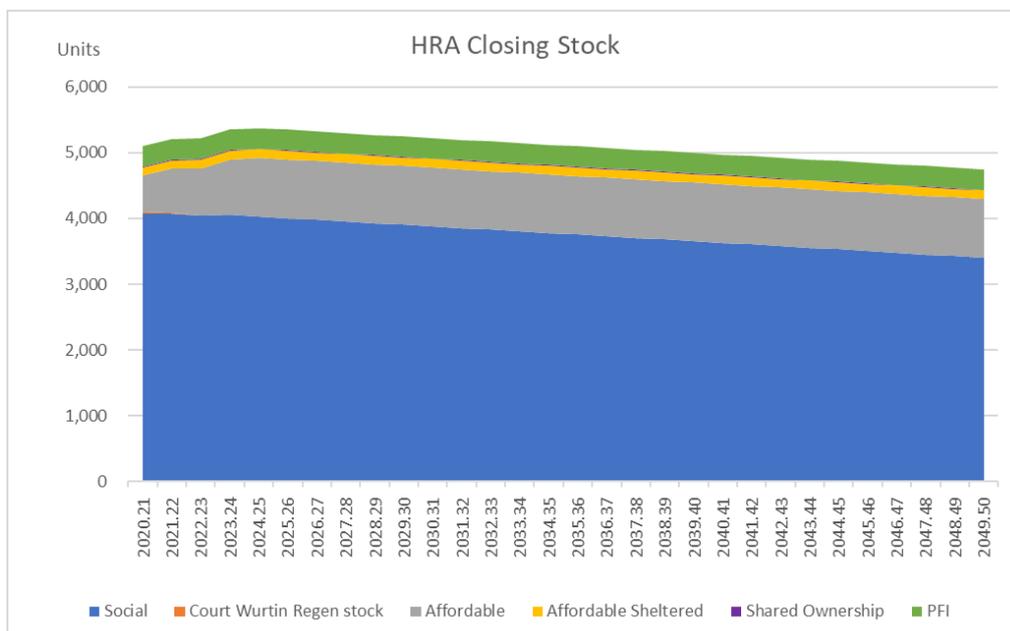
119. The Business Plan model also tracks the levels of planned capital expenditure and the availability of resources, and highlights any years where there are insufficient resources available to meet the financial demands.

120. Graph 4, above, shows the make-up of the capital programme, the majority of the programme is new build and street purchases. Funding is coming from a variety of sources, not only borrowing, but also reserves, 1-4-1 money, and grants (such as those from Homes England). If there were any unfunded projects these would show in red.

121. The large orange section across the breadth of the graph represents the planned maintenance programme for the HRA. As can be seen from the graph this rises from the 2020-21 financial year to represent the additional works being undertaken to support carbon reduction measures.

122. If spend did exceed the availability of funds then mitigating action to make savings or delay projects would be considered. However, the programme, as it currently stands, is affordable and sustainable over the life of the plan.

Graph 3 - Forecast Stock numbers (values shown in £000's, year 1 – 2020-21)



123. The stock numbers in the table above are based on the projects that are likely to go ahead, as per the assumptions in the model. Stock numbers peak in 2024-25 at around 5,370 (compared to current unit numbers of 5,101) showing the positive impact of street purchases. Once the current build programme is completed, unit numbers then decrease, year-on-year, in line with projected right to buy sales. Maintaining and increasing stock numbers is crucial to the management of the housing waiting list. It also assists in the reduction of homelessness, as it provides an opportunity to help move on homeless families from temporary accommodation, which in turn alleviates any financial pressure on the General Fund.
124. It is highly likely of course that new-build projects and street purchases will continue after the 2024-25 financial year, so the aspiration is that these stock numbers will continue to increase, however there is not enough detail available to illustrate the financial implications at this time.

Equalities Impact Assessment

125. Members are referred to the attached assessment at Appendix D. There are no adverse impacts identified.

Consultation Planned or Undertaken

126. Consultation will continue to be held with ward members where acquisitions or proposals fall in their ward boundaries. All sites within any future delivery programme are subject to planning approval and the formal consultation process as part of that. As referenced in the report, online consultation will take place with local residents and ward members – importantly before proposed plans are submitted – giving them an additional opportunity to respond to the proposals outside of the formal planning consultation process.
127. This additional stage of consultation gives local residents and other stakeholders a genuine opportunity to understand and influence the proposals, talking through the likely impact in more detail, albeit virtually, with officers and any experts involved in assisting the Council.

128. It is anticipated that we will be required to undertake a consultation exercise with our tenants as we move forward with plans to develop tenant engagement and meet the wider aspects set out in the Social Housing White Paper. The Council's housing service will liaise with the Corporate Policy team to take opportunities to link this in with wider resident engagement work and consultation planned to assist with creating a level playing field. One such example is that next year housing and corporate policy will launch a joint garden competition which will be available to all residents of the Borough and not just tenants or private home owners separately.

Next Steps in the Process

129. The Council will deliver the schemes it has outlined in Appendix B, which form its current delivery programme. The Council will map the process for those sites that have not yet been approved by planning or are not included in the HRA Business Plan model. It will then bring each site forward for consultation with all relevant stakeholders. Detailed project plans will be developed and necessary preparatory work and site investigations will commence as required. Relevant portfolio holders, ward members and parish councils will be kept informed.
130. The HRA Business Plan is used as a basis for building the 2021-22 budget, although officers continue to work on the assumptions in the Business Plan as new information becomes available. The HRA draft budget will be presented to Cabinet on 17th December 2020 and if approved it will be part of the public consultation on the draft budget. It will be presented to the Council's Overview and Scrutiny budget task group. The final budget report will be presented to Cabinet in February with final approval through Council a week later.

Conclusion

131. The report sets out the breadth of work that the Council's HRA is undertaking at the current time. After a period of pausing to reflect when the debt cap was removed, the Council has now set in place a strong delivery programme and is already delivering homes in great numbers – well on track to smash the target set in its affordable housing delivery plan presented to members last year. It is seeking to capitalise on opportunities presented to it such as in the acquisition of the 'New Quarter' building.
132. Following rigorous risk assessments in light of the pandemic, the Council's development programme is fully costed and the Business Plan illustrates that it is an affordable pipeline of solid sites. Their progress will be reported to members in subsequent reports. The conducting of an asset survey in the 2021-22 financial year will help the Council better understand the detailed condition of its stock and the work that is needed to contribute toward the decarbonisation target.
133. The publication of the Social Housing White Paper is welcome and it has put the focus on the fact that all residents must be treated with respect, irrespective of the tenure of their home. All of the measures included within this report are aimed at recognising that it is right that our tenants can put down permanent roots and have a voice. We will continue to provide a high-quality management service that will ensure tenants comply with our rules, as we comply with those of the Social Housing Regulator.

134. The Council prides itself on the strength of its proven track record in this sector. Housing is a service that links the General Fund and the HRA, and officers are abundantly aware of the role the HRA can play to mitigate pressures in the General Fund through timely, relevant provision. This report demonstrates that despite the pandemic the Council continues to perform strongly and runs its HRA viably.

Portfolio Holder's Views

Portfolio Holder for Housing

135. I am proud to present and endorse this report. We are one of the leading voices and deliverers of affordable housing in the county, and our profile is high. We remain at the forefront of new-build delivery in Kent and are respected by our peers. Our proven track record of delivery, our aspirations and the way we balance our Housing Revenue Account Business Plan illustrate why so many RPs and developers are choosing to invest in our borough, enhancing our economy as we recover from the pandemic. We thank them for their investment and continued engagement.
136. Following a period of necessary reflection after the removal of the HRA debt cap, what we present in this report are really strong figures – with well over 360 homes built, bought or enabled in the borough since April 2019 and hundreds more in the delivery phase. These are impressive figures and with many tools available to us and yet more being developed, we will continue to bring forward the much needed homes those on our waiting list and in our temporary accommodation so desperately need.
137. This report also sets the tone for how we will meet our obligations under the Social Housing Regulator and how we will heed the content of the Social Housing White Paper. It must be recognised that quality homes and secure tenancies contribute to better life chances – as families flourish in their communities, children are more settled in schooling and family members access employment. These are aspirations we all hold dear.
138. Overall, members can see the upward trajectory of our development and the pipeline we have established. Also clearly visible is the way we are thinking holistically about management, maintenance, finances and wider corporate objectives. This is a report that shows Ashford can be proud of its approach to delivering genuinely affordable housing.

Portfolio Holder for Finance

139. I am pleased to note this report, which fuses together the former HRA Business Plan report and the HRA delivery update into a much more contextual paper that gives real insight into the HRA. I am content with the viability of our overall plans and the sensible, measured approach taken to development and wider corporate goals.
140. In the volatile financial environment in which we find ourselves, an affordable, sustainable Business Plan that can repay its debt, despite significantly increased delivery and new Government initiatives is excellent news. Such a solid financial footing and awareness of our future expenditure expectations will only help us as we look to deliver, manage and maintain much-needed homes in the years ahead.

Contact and Email

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HRA Business Plan (extract) – Top level budget summary to 2028/29

© Housing Finance Associates	HRA Business Planning Model				Ashford Borough Council						
Description	1	2	3	4	5	6	7	8	9	10	11
	2020.21	2021.22	2022.23	2023.24	2024.25	2025.26	2026.27	2027.28	2028.29	2029.30	2030.31
Income											
Gross Rental Income	£24,948	£25,959	£27,541	£28,615	£30,550	£31,448	£31,942	£32,442	£32,950	£33,465	£33,988
Void Losses	-£709	-£519	-£551	-£572	-£611	-£629	-£639	-£649	-£659	-£669	-£680
Other Rental Income	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Tenanted Service Charges	£1,016	£1,041	£1,067	£1,094	£1,121	£1,149	£1,178	£1,208	£1,238	£1,269	£1,301
Leasehold Service Charges	£114	£117	£120	£123	£126	£129	£133	£136	£139	£143	£146
Non-Dwelling Income	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Grants	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000	£3,000
Other Income	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Total income	£28,369	£29,598	£31,177	£32,260	£34,187	£35,098	£35,614	£36,137	£36,668	£37,207	£37,755
Expenditure											
General Management	-£9,572	-£9,747	-£9,976	-£10,160	-£10,424	-£10,696	-£10,975	-£11,261	-£11,555	-£11,856	-£12,166
Special Management	-£839	-£845	-£859	-£865	-£884	-£904	-£924	-£944	-£965	-£986	-£1,008
Other Management	-£938	-£997	-£1,016	-£995	-£1,015	-£1,035	-£1,056	-£1,077	-£1,099	-£1,121	-£1,143
Bad Debt Provision	-£100	-£104	-£110	-£115	-£122	-£126	-£128	-£130	-£132	-£134	-£136
Responsive & Cyclical Repairs	-£4,084	-£4,200	-£4,310	-£4,414	-£4,541	-£4,779	-£4,996	-£5,162	-£5,417	-£5,592	-£5,730
Other revenue expenditure	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Total expenditure	-£15,533	-£15,893	-£16,271	-£16,550	-£16,987	-£17,540	-£18,079	-£18,574	-£19,168	-£19,690	-£20,183
Capital financing costs											
Interest paid on debt	-£4,216	-£4,418	-£4,817	-£5,116	-£5,372	-£5,656	-£5,518	-£5,397	-£5,240	-£5,090	-£5,015
Interest paid on 141 receipts	£0	£0	£0	£0	£0	£0	£0	-£0	-£0	-£0	-£0
Debt management expenses	-£74	-£74	-£76	-£77	-£79	-£81	-£82	-£84	-£86	-£87	-£89
Interest Received	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Depreciation	-£5,619	-£5,865	-£6,048	-£6,254	-£6,473	-£6,603	-£6,704	-£6,806	-£6,909	-£7,014	-£7,120
Capital financing costs	-£9,909	-£10,356	-£10,940	-£11,447	-£11,924	-£12,340	-£12,304	-£12,286	-£12,235	-£12,192	-£12,225
Appropriations											
Revenue provision (HRA CFR)	-£2,000	-£5,545	-£901	-£4,166	-£5,360	-£5,009	-£5,228	-£5,276	-£5,266	-£5,325	-£5,347
RCCO	-£3,385	-£60	-£3,060	£0	£0	£0	£0	£0	£0	£0	£0
Other appropriations	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Appropriations	-£5,385	-£5,605	-£3,961	-£4,166	-£5,360	-£5,009	-£5,228	-£5,276	-£5,266	-£5,325	-£5,347
Net income/ (expenditure)	-£2,458	-£2,257	£5	£97	-£84	£210	£3	£1	-£0	£1	£0

Appendix B – Projects confirmed and consulted on to date

Project	Units / proposed scheme	Anticipated completion
Short stay accommodation facilities		
112 Beaver Road	8 x 1-bed units for short-stay temporary accommodation	December 2020
Affordable Homes Programme – Independent living accommodation		
East Stour Court, Willesborough	29 units of independent living accommodation 24 x 1-bed and 5 x 2-bed (with scheme manager)	May 2021 (on site now) Homes England (HE) 2016-21 grant – confirmed
The Poplars, South Ashford	31 units (15 x 1-bed and 16 x 2-bed) of independent living accommodation	October 2021 (on site now) Homes England (HE) 2016-21 grant – confirmed
Oakleigh House, South Ashford	66 units of independent living accommodation (including 12 learning disability units) (with scheme manager)	January 2023 (on site now)
Affordable Homes Programme – Phase 6		
Halstow Way, South Ashford	17 units of general needs accommodation (6 x 1-bed, 7 x 2-bed and 4 x 3-bed apartments – utilising Selah blocks)	September 2021
Piper Joinery, Willesborough	22 units of general needs accommodation (Proposed mix: 8 x 3-bed terraced houses, 4 x 2-bed terraced houses, 8 x 2-bed flats, 2 x 3-bed flats)	September 2022 1-4-1 (as site purchased using RTB receipts, so cannot mix RTB and HE grant) – so 30% for whole development
Harper Road	4 x 2-bed houses for affordable rent	TBC

Ashford Borough Council Homes built or acquired via s106 or off-plan since 2011

(n.b excludes street purchases)

Site	Properties (tenure = affordable rent unless specified)	Building	Status	Handover
Hunter Close, Ashford	3 x 2-bed houses	2 bed House	Completed	23-Mar-11
Towers View, Ashford	5 x 1-bed bungalows	1 bed Bungalow	Completed	31-Mar-11
Towers View, Ashford	3 x 2-bed houses	2 bed House	Completed	31-Mar-11
Towers View, Ashford	2 x 2-bed bungalows	2 bed Bungalow	Completed	31-Mar-11
Breadlands Road, Quarry Close, Willesborough	7 x 2-bed houses	2 bed House	Completed	27-Apr-11
Blake Court, Willesborough	3 x 3-bed houses	3 bed House	Completed	31-May-11
Gerlach House, Ashford	2 x 1-bed flats	1 bed Flat	Completed	31-May-11
Orchard View, Bethersden	3 x 2-bed bungalows	2 bed Bungalow	Completed	11-Oct-11
The Chennells, High Halden	4 x 1-bed flats	1 bed Flat	Completed	04-Nov-11
Nine Acres, Kennington	2 x 2-bed bungalows	2 bed Bungalow	Completed	11-Nov-11
Sotherton, Willesborough	4 x 1-bed flats (for people with learning difficulties)	1 bed Flat	Completed	17-Nov-11
Sotherton, Willesborough	1 x 1-bed bungalow (for a person with learning difficulties)	1 bed Bungalow	Completed	17-Nov-11
Arlington, Ashford	3 x 3-bed houses	3 bed House	Completed	01-Dec-11
Singleton Road, Ashford	4 x 2-bed houses	2 bed House	Completed	01-Dec-11
Bybrook Road, Ashford	2 x 3-bed houses	3 bed House	Completed	07-Dec-11
Bybrook Road, Ashford	1 x 3-bed house	3 bed House	Completed	20-Jan-12
Mardol Road, Ashford	3 x 3-bed houses	3 bed House	Completed	07-Dec-11
Mardol Road, Ashford	1 x 3-bed house	3 bed House	Completed	03-Feb-12

Cheeselands, Biddenden	5 x 2-bed bungalows	2 bed Bungalow	Completed	10-Feb-12
Beaver Lane, Ashford	2 x 2-bed houses	2 bed House	Completed	12-Mar-12
Luckley House, Wye	9 x 1-bed flats	1 bed Flat	Completed	26-Mar-12
Orion Way, Ashford	2 x 4-bed houses	4 bed House	Completed	26-Mar-12
Orion Way, Ashford	7 x 3-bed houses	3 bed House	Completed	26-Mar-12
Birling Road, Ashford	1 x 3-bed house	3 bed House	Completed	27-Sep-13
Christchurch Road, Ashford	8 x 1-bed bedsits (for use as temporary accommodation) – note these properties sit in the General Fund	1 bed Bedsit	Completed	29-Aug-14
Hawthorn, Appledore	4 x 2-bed flats	2 bed Flat	Completed	21-Nov-14
Hawthorn, Appledore	4 x 2-bed bungalows	2 bed Bungalow	Completed	18-Dec-14
Wind Hill, Charing	2 x 2-bed bungalows	2 bed Bungalow	Completed	18-Dec-14
Wind Hill, Charing	1 x 3-bed bungalow	3 bed Bungalow	Completed	18-Dec-14
Manse Field, Brabourne	2 x 3-bed houses	3 bed House	Completed	19-Dec-14
Randolph Gardens, Kennington	8 x 3-bed houses	3 bed House	Completed	19-Dec-14
Riverview, Ashford	3 x 2-bed houses	2 bed House	Completed	19-Dec-14
Riverview, Ashford	1 x 3-bed house	3 bed House	Completed	19-Dec-14
Arcon Road, Ashford	3 x 3-bed houses	3 bed House	Completed	30-Jan-15
Simons Ave, Ashford	3 x 3-bed houses	3 bed House	Completed	30-Jan-15
Cryol Road, Ashford	4 x 3-bed houses	3 bed House	Completed	27-Feb-15
Cryol Road, Ashford	2 x 4-bed houses	4 bed House	Completed	27-Feb-15
Cryol Road, Ashford	1 x 6-bed house	6 bed House	Completed	27-Feb-15
Poppy Fields, Charing	7 x 2-bed houses (shared ownership)	2 bed House	Completed	16-Nov-15
Poppy Fields	1 x 3-bed house (shared ownership)	3 bed House	Completed	16-Nov-15
Poppy Fields	13 x 3-bed	3 bed House	Completed	16-Nov-15
Farrow Court	81 x 1-bed flats (14 for those with learning difficulties)	1 bed Flat	Completed	20-Nov-15
Farrow Court	23 x 2-bed flats	2 bed Flat	Completed	20-Nov-15

Boxley, Ashford	2 x 3-bed houses	3 bed House	Completed	14-Dec-17
Noakes Meadow, Ashford	2 x 2-bed bungalows	2 bed Bungalow	Completed	19-Feb-18
Beecholme Drive, Kennington	2 x 3-bed houses	3 bed House	Completed	20-Mar-18
Priory Way, Tenterden	2 x 3-bed houses	3 bed House	Completed	20-Mar-18
Belmont Place, Ashford	3 x 2-bed flats	2 bed Flat	Completed	28-Mar-18
Jubilee Fields, Wittersham	4 x 3-bed houses	3 bed House	Completed	05-Dec-18
Brattle, Woodchurch	4 x 2-bed houses	2 bed House	Completed	13-Dec-18
Calland HRA 15-18	2 x 2-bed houses	2 bed House	Completed	19-Dec-18
Calland HRA 15-18	2 x 3-bed houses	3 bed House	Completed	19-Dec-18
Danemore, Tenterden	23 x 1-bed flats	1 bed Flat	Completed	15-Feb-19
Danemore, Tenterden	11 x 2-bed flats	1 bed Flat	Completed	15-Feb-19
Chequers Green, Shadoxhurst	2 x 2-bed houses (shared ownership)	2 bed House	Completed	01-Aug-19
Chequers Green, Shadoxhurst	2 x 2-bed houses	2 bed House	Completed	01-Aug-19
Kings Close, Shadoxhurst	4 x 1 bed flats	1 bed Flat	Completed	14-Oct-19
Kings Close, Shadoxhurst	1 x 2 bed house	2 bed House	Completed	14-Oct-19
Kings Close, Shadoxhurst	2 x 2 bed house (Shared Ownership)	2 bed house	Completed	14-Oct-19
Ragstone Hollow, Aldington	2 x 2-bed bungalows	2 bed Bungalow	Completed	11-Mar-20
Ragstone Hollow, Aldington	2 x 3-bed bungalows	3 bed Bungalow	Completed	11-Mar-20
The Weavers, Biddenden	2 x 2-bed chalet bungalows	2 bed Bungalow	Completed	13-Aug-20
New Quarter, West Block, Ashford	23 x 1-bed flats	1 bed Flat	Completed	24-Nov-20
New Quarter, West Block, Ashford	21 x 2-bed flats	2 bed Flat	Completed	24-Nov-20

Equality Impact Assessment

Appendix D to December 2020 Cabinet report

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

- (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
- (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
- (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
- (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership*
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:
- removing or minimising disadvantages suffered by people due to their protected characteristics.
 - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
 - encouraging people with certain protected characteristics to participate

in public life or in other activities where it is disproportionately low.

7. How much regard is 'due' will depend on the circumstances. The greater the potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.
8. In terms of timing:
 - Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
 - Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
 - The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Case law principles

9. A number of principles have been established by the courts in relation to the equality duty and due regard:
 - Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
 - Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.

- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on "Meeting the Equality Duty in Policy and Decision-Making" (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or service development or change and other decisions likely to engage the equality duty. [Equality Duty in decision-making](#)

Lead officer:	Mark James
Decision maker:	Cabinet
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	<ul style="list-style-type: none"> • Note the progress in delivering affordable housing in the HRA and temporary accommodation within the General Fund. • Agree the proposed additions to the Council's affordable homes delivery programme. • Agree the HRA priorities and actions as set out in the report at paragraphs (??) • Review and agree the updated HRA Business Plan and financial projections. • Note that Overview and Scrutiny (O&S) will review the HRA Business Plan financial projections as part of the budget scrutiny process • Agree the Council's plans for future housing delivery as set out in Exempt Appendix B, which represents the full delivery programme, and delegate authority to the Head of Housing in consultation with the Head of Finance and IT and the Portfolio holders for Housing and Finance and IT to vary the programme as necessary
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	17 th December 2020
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	Note the progress in delivering affordable housing in the HRA and temporary accommodation within the General Fund. Agree the HRA priorities and actions as set out in the report at paragraphs (??) Review and agree the updated HRA Business Plan and financial projections. Note that Overview and Scrutiny (O&S) will review the HRA Business Plan financial projections as part of the budget scrutiny process Agree the Council's plans for future housing delivery as set out in Exempt Appendix B, which represents the full delivery programme, and delegate authority to the Head of Housing in consultation with the Head of Finance and IT and the Portfolio holders for Housing and Finance and IT to vary the programme as necessary
Information and research: <ul style="list-style-type: none"> • Outline the information and research that has informed the decision. 	Building on solid foundations: delivering affordable homes in Ashford – our delivery plan for 2019-2023 Housing Strategy Framework Priority 1 – Improve the supply of affordable housing to meet local housing needs in urban and rural areas, and Housing Statement 2018-2023

<ul style="list-style-type: none"> • Include sources and key findings. 	<p>Reform of HRA – Cabinet endorsed five key priorities for further spend, as a result of greater freedom within the HRA. National Housing Strategy 2011 – delivering new homes under the affordable rent model.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>Consultation has taken place with colleagues in Finance and ICT, the Housing Development Team, Housing Options and Corporate Property Services.</p> <p>Consultation has additionally taken place with Cabinet members and Ward members for those wards with forthcoming development identified in the report.</p> <p>With regards the HRA programme in general, the consultation has been to identify suitable areas to develop out affordable homes and the level of finance (inclusive of grant and capital contributions) required to achieve the programme.</p> <p>Other sites are alluded to in the report and other sites included in exempt appendices in the HRA reports of 2018 and 2019. Further consultation will be carried out with ward members and the communities in which new affordable homes are proposed. These consultations will be taken forward before any proposed scheme is submitted to the planning department.</p>

Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	High	Positive (major)
Middle age	High	Positive (major)
Young adult	High	Positive (major)
Children	High	Positive (major)
<u>DISABILITY</u> Physical	High	Positive (minor)
Mental	High	Neutral
Sensory	None	Neutral
<u>GENDER RE-ASSIGNMENT</u>	None	Neutral

<u>MARRIAGE/CIVIL PARTNERSHIP</u>	None	Neutral
<u>PREGNANCY/MATERNITY</u>	None	Neutral
<u>RACE</u>	None	Neutral
<u>RELIGION OR BELIEF</u>	None	Neutral
<u>SEX</u> Men	None	Neutral
Women	None	Neutral
<u>SEXUAL ORIENTATION</u>	None	Neutral

<p>Mitigating negative impact:</p> <p>Where any negative impact has been identified, outline the measures taken to mitigate against it.</p>	<p>Where the assessment has been carried out above it is on the basis of the new developments planned and new acquisitions in the pipeline. This takes into account the fact that vulnerable adults will be allowed into the new 'New Quarter' building only should they have in place an appropriate support plan and that no more than 10% of the units will be let to those classed as vulnerable at any one time.</p> <p>The emphasis on keyworkers may mean that older people and those not in employment are not prioritised in the New Quarter development, but the units at East Stour Court and The former Poplars site are being constructed specifically for those in older age. Older applicants on our waiting list or in our stock already are well catered for in terms of our existing provision of independent living schemes and the ongoing work to deliver several new independent living schemes across the borough.</p>
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<p>Is the decision relevant to the aims of the equality duty?</p> <p>Guidance on the aims can be found in the EHRC's Essential Guide, alongside fuller PSED Technical Guidance.</p>	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	N/A
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	N/A

<p>Conclusion:</p> <ul style="list-style-type: none"> • Consider how due regard has been had to the equality duty, from start to finish. • There should be no unlawful discrimination arising from the decision (see guidance above). • Advise on whether the proposal meets the aims of the equality duty or whether adjustments have been made or need to be made or whether any residual impacts are justified. • How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported? 	<p>Due regard has been considered throughout this proposal to each protected group.</p> <p>No unlawful discrimination has arisen from the decision.</p> <p>The effect on the community will be positive due to the aims of the programme delivery. No adjustments required.</p> <p>The programme will be monitored by a Housing Project group with regular updates to our Portfolio Holder and Cabinet.</p>
<p>EIA completion date:</p>	<p>26th November 2020</p>