

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE New Homes for Small Sites Programme - Phase 1 (SC/2023/09)	
REPORT OF Cabinet Member for New Homes, Jobs, and Community Investment	
FOR SUBMISSION TO Housing Scrutiny Committee Cabinet	DATE 21 st February 2023 22 nd February 2023
STRATEGIC CONTEXT Secure, good-quality housing is fundamental to residents' well-being. We want to be bold in supporting the <i>We Make Camden</i> ambition: <i>Everyone in Camden should have a place they call home.</i> Camden is tackling the housing crisis using all the levers available to us – including building bigger, better homes for our families and communities. The Community Investment Programme (CIP) is one of our most significant and ambitious levers for tackling inequality and improving lives in our Borough. <i>We Make Camden</i> is our joint vision for the Borough, developed in partnership with our community. The Community Investment Programme contributes to the aspirations set out by our communities through <i>We Make Camden</i> by building homes that are safe, genuinely affordable, the right size, and accessible. CIP is aligned with our organisational commitment to tackle the climate emergency and support households to avoid debt and financial hardship by creating homes that reduce heating and energy costs. CIP plays a key role in supporting our local economy, creating apprenticeships and jobs, as we continue to build the housing and community facilities our residents need. Creating more affordable housing for families is a key priority. Camden's central London location places it at the sharp end of the housing affordability crisis. Camden desperately needs new council-owned homes for families, and housing at a genuinely affordable rent; 70% of the 6,753 households on the housing register live in overcrowded conditions. Since only 6% of the funding required for building homes comes from central government, CIP is our innovative way of addressing the housing crisis affecting Camden families. The New Homes for Small Sites Programme will provide opportunities for Small and Medium-sized Enterprises (SMEs) and community or self-build developers and as such, would support the <i>We Make Camden</i> ambition that 'Camden's local economy should be strong, sustainable, and inclusive – everyone should have a secure livelihood to support them to live a prosperous life.' The <i>Way We Work</i> is the Council's response to <i>We Make Camden</i> . The Small Sites Programme also supports emerging programmes emanating from the Council's renewal and recovery activity. This includes work to bring 'vacant spaces' on estates (which are unsuitable for housing) back into community, social and SME use. These new spaces will augment 'safe, strong, and open communities' on these estates, as well as provide a platform for social action, particularly around sustainability	

initiatives, working towards achieving our ambition that by 2030, Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity.

SUMMARY OF REPORT

The New Homes for Small Sites Programme sets out an approach for delivering new homes on under-utilised estate and infill sites across the borough. This report outlines the delivery strategy for a linked package of sites to be progressed as Phase 1 of the programme.

This report builds on the Cabinet decision made in September 2021, (SC/2021/23), and seeks budget approval to secure planning consent on sites identified for direct delivery of new affordable homes by the Council and enable the further development and preparation of sites for sale.

Following the previous Cabinet decision, engagement work began with residents and communities on the New Homes for Small Sites Programme. This report updates Cabinet on the findings of the engagement programme and recommends 5 sites are progressed towards the delivery of up to 73 additional genuinely affordable homes on existing estates.

Local Government Act 1972 – Access to Information

No documents that require listing were used in the preparation of this report.

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RECOMMENDATIONS

The Housing Scrutiny Committee is asked to consider the report and make any recommendations to the Cabinet.

That having considered the results of the Equalities Impact Assessment at Appendix 1, and initial engagement at Appendix 3, and having due regard to the obligations set out in section 149 of the Equality Act 2010, Cabinet is asked to agree:

1. The overall proposed delivery strategy ("New Homes for Small Sites Delivery Strategy"), set out in Section 2 of the report.
2. To delegate authority to the Executive Director Supporting Communities in consultation with the Executive Director Corporate Services, the Cabinet Member for New Homes, Jobs and Community Investment, the Cabinet Member for Finance and Cost of Living, the Cabinet Member for Better Homes, the Director of Development, Head of Property and Borough Solicitor, make all decisions and carry out all actions reasonably required to action and implement the delivery of the New Homes for Small Sites Strategy, for the sites listed at 2.11, such decisions to include;

- Approval of development schemes for the Phase 1 Delivery Sites listed, (this to include up to Royal Institute of British Architects (RIBA) Stage 3, Planning stage, with budget established to fund work to secure planning consent as set out in Part II of the report)
- To approve all Procurement Strategies and make Contract Awards including procurement of a design team required to deliver the New Homes for Small Sites Delivery Strategy.
- To agree a Disposals Strategy in respect of the sale of a further package of assets, as set out in the report.
- Approval of budgets and strategy for delivery of genuinely affordable homes following planning decision. Options for the delivery strategy are set out in Section 3 of this report and in Part II of the report.



Signed:
Neil Vokes, Director of Development
Date: 9th February 2023

1. CONTEXT AND BACKGROUND

- 1.1. The New Homes for Small Sites Programme is exploring development opportunities on underutilised estate land. It aims to maximise the number of genuinely affordable homes by delivering the first phase as a linked package of delivery sites and sites for sale.
- 1.2. The September 2021 Cabinet paper set out that we would look at a number of disposals to invest in the delivery of 100% affordable homes on retained sites.
- 1.3. The delivery of new genuinely affordable homes within existing estates will bring several clear benefits for Camden in addition to providing for those in housing need. This programme can offer opportunities for existing residents to potentially benefit from new homes whether up-sizing or down-sizing and affording them the opportunity to maintain existing relationships and support networks built within their estate and community. Residents can also benefit through the estate improvement budget allocated to each site, to be led by residents, and there can be wider benefits through the construction process through apprenticeship opportunities and to local businesses.
- 1.4. The delivery of new homes as part of this programme will create new assets for Camden, and a new income for either the Housing Revenue Account (HRA), or the General Fund (GF) if transferred to Camden Living Registered Provider as per Option 2 outlined in section 3.3 below.
- 1.5. To meet the funding challenge, and to maximise the delivery of new council homes on estates, Camden has decided to look more widely at its assets and review how best to use them for community benefit. This programme proposes the sale of assets that are deemed as under-utilised or under-performing and reinvesting that capital into the creation of new Council assets.
- 1.6. Addressing housing need is a key priority for Camden, and small and infill sites, often vacant or in use as parking or storage, can be better utilised and prioritised for the creation of new homes. Where commercial sites are deemed as under-performing it can be based on several factors, but often these are older assets that will require some additional investment to improve performance, as presently require significant upkeep. In consideration of the sale of assets it is important to consider what is lost, such as a revenue income from commercial properties or parking and garages, however, these decisions need to be taken in consideration of the wider benefits for Camden and the community.
- 1.7. The New Homes for Small Sites Programme aims to help diversify the housing market. Some sites are expected to be identified for sale, suitable for local residents, community groups and local self-builders to develop for themselves and their community (subject to best value considerations). Most sites will be sold on the open market to maximise delivery of new affordable homes on retained sites.
- 1.8. Officers commenced Stage 1 of the engagement programme in January 2022, launching the programme principles across the whole borough through the 'Call for Ideas' webpage, hosted through the Commonplace engagement platform. Residents were asked to nominate sites for building new homes on council owned land. This locally led approach will help to identify future locations for new homes and to start a conversation on the benefits that development could bring to estate communities.
- 1.9. The Stage 2 engagement, on estates which had already been identified by Camden, began in June 2022 across 10 initial locations.

- 1.10. We now seek to progress design development on a reduced package of sites, identified as Phase 1, which have been shortlisted based on resident feedback, previous due diligence work and site assessment as outlined in Appendix 4.
- 1.11. A further report as in Appendix 3 sets out a summary of the engagement work, informing the Council's decision making and the business case for delivery of new additional genuinely affordable homes on existing estates.

2. PROPOSAL AND REASONS

- 2.1. The New Homes for Small Sites Programme offers the opportunity to deliver additional affordable homes on existing estates, without the need to rehouse residents or demolish existing homes.

New Homes for Small Sites Delivery Strategy

- 2.2. This will be unified under a single vision which includes the following objectives:
 - Innovative well-designed homes, allowing flexibility in layout for individuals, families & sharers.
 - New homes & estate improvements which support family friendly estates and balanced communities.
 - Maximising delivery of new affordable homes, with significant numbers of new additional council homes.
 - Engaging with small and medium enterprises (SMEs) through the procurement and delivery process.
 - Focusing on sustainable construction methods and achieving high sustainability standards in new homes.
 - Social Value to be embedded throughout the programme.
- 2.3. Despite years of government cuts, Camden has been able to continue delivering new buildings through the Community Investment Programme (CIP) using limited borrowing, small grants and by building homes for sale.
- 2.4. Build costs have rapidly increased in the UK, in part due to increased requirements for fire safety and environmental performance and exacerbated by the Covid pandemic, Brexit, the war in Ukraine and the broader trend towards higher inflation. This has led to greater challenges in how we fund and deliver new homes.
- 2.5. The Council's response to the pandemic has led to significant revenue expenditure and additional pressure on the Council's finances. Current Housing Revenue Account (HRA) borrowing pressures, due to the legacy of these issues, limit the ability for upfront investment over the short to medium term. This limitation on borrowing means that the typical delivery model is not viable.
- 2.6. With inflation and recent economic uncertainty, the continued funding of new council home-building brings clear challenges; however, Camden wishes to continue to meet these challenges and to continue to build quality social housing, as we see the difference this makes to our communities.
- 2.7. This builds on work to increase the number of family-sized council homes in the borough as Cabinet agreed in December to implement a new asset management strategy to reduce the number of families living in overcrowded homes. The new Overcrowding Strategy will purchase 280 former Right-to-

Buy council homes to increase the number of family homes available for social rent. The programme will provide more than 100 Camden families living in severely crowded conditions with a suitable home and will make hundreds of additional bed spaces available to residents on the council's housing register. This approach aims to manage our assets in a way that allows us to invest in our current residents, but also in the future of our council housing stock for this and the next generation.

- 2.8. On smaller sites, it is less efficient (or sometimes impossible) to deliver mixed tenure schemes. Camden is proposing a different approach whereby split sale and development sites are preferable because; a) sites with 100% affordable homes can more easily access funding through Greater London Authority (GLA) grant criteria, b) delivering 100% affordable housing on retained sites reduces sales risk and simplifies direct development, and c) sites with less than 10 homes can achieve a higher sales value. This approach is suitable for a multi-site programme and reduces HRA borrowing pressure whilst supporting investment into other Council priorities.
- 2.9. Since the previous Cabinet paper in September 2021, the New Homes for Small Sites Programme has commenced engagement in 2 stages as outlined in that Cabinet paper.
- 2.10. Stage 1, launching an online engagement programme through the Commonplace engagement platform, 'Call for Ideas'.
- 2.11. Stage 2, launching engagement across 10 sites, in 8 wards. Since June 2022 we have commenced early-stage engagement on the following sites:

Phase 1 Engagement Sites

1. **Castle Road Estate.** Camden Town Ward.
 2. **Raglan Street Estate.** Kentish Town South Ward.
 3. **Bernard Shaw & Foster Court Estate.** Kentish Town South Ward.
 4. **Highgate Road Estate.** Highgate Ward.
 5. **Spencer Rise & Churchill Road Estate.** Highgate Ward.
 6. **Kilburn Vale Estate.** Kilburn Ward.
 7. **Dennington House Estate.** West Hampstead Ward.
 8. **College Place Estate.** St Pancras & Somers Town Ward.
 9. **Sanderson Close.** Kentish Town North Ward.
 10. **Laystall Court.** Holborn Ward
- 2.12. Officers have been speaking with residents on estates through door knocking and pop-up events. Officers have knocked on doors on estates, multiple times where possible, to increase the reach across estates and targeting all our residents.
 - 2.13. Residents have been offered different ways to contribute to the engagement process including through the feedback form; through the post with a pre-paid return envelope, by completing an online survey and also by completing surveys with officers at the door or at drop-in events on each estate.
 - 2.14. Residents were given a map of their estate with the potential development site highlighted. At drop-in events residents also gave wider feedback on their estate - what they liked or disliked and other areas they thought could be improved or developed. Data and feedback from these activities are summarised in reports for both the Stage 1 and Stage 2 engagement programmes. Please refer to Appendix 2 and 3.

- 2.15. **We recommend the following five sites, delivering up to 73 new, genuinely affordable homes as part of Phase 1 of the programme.**

Phase 1 Delivery Sites

	Site	Ward
1	Castle Road Estate	Camden Town
2	Raglan Street Estate	Kentish Town South
3	Highgate Road Estate	Highgate
4	Bernard Shaw & Foster Court Estate	Kentish Town South
5	Spencer Rise & Churchill Road Estate	Highgate

- 2.16. In total these five sites could deliver up to:
- 44 general needs social rent homes
 - 23 intermediate rent homes
 - 6 social rent supported living homes

The final scope of new development on these estates will be explored with residents in the next stage of engagement, to address feedback from the initial engagement programme.

- 2.17. The feedback on the Castle Road Estate and Highgate Road Estate was in general supportive of new homes being built on a small site on their estate.
- 2.18. The majority of responses on the Raglan Street Estate, Bernard Shaw & Foster Court Estates and Spencer Rise Estate have been negative in sentiment so far. However, after reviewing the wider feedback and in consideration of other factors including technical due diligence, existing uses, and capacity for new homes we recommended bringing these sites forward for further design development as part of Package 1, but with a reduced area or scale of development on the estate, in response to concerns raised by respondents through the engagement.
- 2.19. The Council recognises that there are always a range of views about new development and is very mindful of local concerns about disruption and loss of amenities. The approach for the next stage of delivery will include further engagement with residents on a whole range of design issues as well as discussions on providing meaningful benefits back to affected estate residents. Increasing the supply of genuinely affordable homes remains a key council priority.

Supported Living Cluster

- 2.20. In addition to providing new social rented homes and intermediate rented homes through Camden Living, there is an identified need for specialist housing.
- 2.21. This project provides an opportunity to deliver 6 new social rented homes as part of a staffed Supported Living Cluster. Camden has reserved a £3.6m capital allocation at 2022/23 Capital Review, along with a further GLA grant allocation of £900,000 (£150,000 per home).
- 2.22. A separate site review is being undertaken to determine the appropriate site for the delivery of this specialist housing.

Sites not Recommended for Delivery by Camden

- 2.23. The following Sites may not be considered for direct development by Camden, but some will be considered for sale as described in Section 2.35 below.
- 2.24. Sites located within estates, which have had early engagement:

	Site	Ward
1	Kilburn Vale Estate - garages	Kilburn
2	Dennington House Estate - Inglewood Road Garages	West Hampstead
3	College Place Estate – infill site adjacent Theatro Technis	St Pancras & Somers Town
4	Carroll & Sanderson Close Estate - car park	Kentish Town North
5	Laystall Court - car park	Holborn

- 2.25. A further 3 sites, which are located within the HRA portfolio but are located outside of estates, have been explored for building new homes, but have not had early engagement. These sites are deemed ‘micro sites’ as are expected to yield only 1 or 2 new homes per site and will be considered for sale. Further details are included in Part II of this report.
- 2.26. If the 8 sites noted above are brought forward for development by others, they could potentially deliver **up to 30 additional homes**. Further due diligence work will be required to determine which sites are progressed to the next stage of sale.
- 2.27. See summary table below assessing potential tenure and bed-size split of sites listed in sections above, assuming 5 sites delivered directly by Camden.

Site	Tenure				Property Type / Bed Size				Total
	Social Rent	CL Inter Rent	Assisted Living / Specialist	*Assume Private Tenure	1 - Bed	2 - Bed	3 - Bed	4 - Bed	
TYPE A - RETAINED SITES DELIVERY BY CAMDEN 5 SITES Up to 73 Units - 70% of Total	44	23	6	0	27	29	14	3	73
TYPE B - SITES SOLD DELIVERY BY OTHERS 8 SITES Up to 30 Units - 30% of Total	0	0	0	30	13	17	0	0	30
Total Units	44	23	6	30	40	46	14	3	103
Total % of Units	43	22	6	29	39	45	14	3	

Further Consideration of Council Assets

- 2.28. There are further identified under-performing council property assets, which if sold, could fund the delivery of new affordable homes on existing estates in Camden. Further disposals are required to fully fund the development of all five sites listed at paragraph 2.15. Progressing these sales could enable the capital receipts to reinvest into the delivery of new affordable homes for Camden residents whilst providing additional rental revenue income.
- 2.29. A number of properties within the commercial property portfolio have been identified as poor performing. Further analysis, including formal valuations and assessment of any capital investment required for possible retention where appropriate will be carried out. Possible transfer of some of the properties to

Camden Living will also be considered, where such properties have residential aspects. Properties identified as underperforming i.e., with low yield/ return, low-income growth or requiring substantial capital investment may be recommended for disposal. The Part II report includes the list of the identified properties, outlines further details on the sites and funding strategy for delivery of the new homes. Any disposals will be subject to formal decision making in accordance with the Constitution.

Budget for Phase 1 Design Development

- 2.30. To progress towards securing planning consents on the 5 identified development sites, a budget of £1.248M is needed to appoint a client team and commence design work.
- 2.31. Key appointments will include commissioning a multi-disciplinary design team; cost consultants; resources to progress further detailed consultation with estate communities, including around the provision of community benefits.
- 2.32. Funding for these consents and future construction works are dependent on the sale of some sites; along with subsidy from a variety of sources such as grant allocations secured through the GLA and One Public Estate (OPE); an agreed capital allocation for the Supported Living Cluster; and the transfer of intermediate and potentially social rent homes into the Camden Living company (subject to future approvals).
- 2.33. To achieve requirements for OPE grant allocation, demolition and enabling works for Castle Road Estate small site will need to be programmed in advance of the wider Phase 1 small sites programme.
- 2.34. A key principle of the New Homes for Small Sites Programme is to keep down Council borrowing and peak debt so far as possible by concluding the disposal programme prior to the delivery of new homes. Working across multiple small sites enables a degree of flexibility to scale the programme, where appropriate, so the Council can deliver sites in reaction to funding available and increase scale if more funding becomes available.
- 2.35. Further work is needed to confirm a final package of disposal sites and sale receipts. A detailed Disposals Strategy will be produced from April 2023 to support this. Sites will be recommended for disposal under delegated authority after the completion of technical due diligence and consultation where appropriate to the scale of the site. The sale of these properties will be at best consideration and the Asset Strategy and Valuations team will adopt the appropriate disposal route to achieve this.
- 2.36. Working with a variety of partners, developers and community builders allows the best opportunity for Camden to encourage the delivery of a range of homes at speed with supply chain opportunities for various SME organisations. Funds generated by sales will be directly reinvested into local estate improvements along with the provision of new, genuinely affordable homes on the retained sites.

3. OPTIONS APPRAISAL

Phase 1 Delivery Strategy Options

- 3.1. Camden's priorities for this programme are to:
- (i) Directly deliver new homes as quickly as possible.
 - (ii) Maximise & prioritise the amount of additional affordable homes.
 - (iii) Deliver new homes without any increase of borrowing within the HRA.
 - (iv) Identify funding routes to bring forward delivery of new homes, with no net impact on the Council's Capital Financing Requirement (CFR).
- 3.2. **Option 1**, for Phase 1 delivery is to progress the design development of 4 sites, as 100% affordable tenure, as outlined in section 2.14 above, through direct delivery by the council, funded through capital raised through site sales, grant and Camden Living transfers. A fifth site will be delivered separately as outlined in section 2.20 above, as a Supported Living Cluster. This is the typical CIP delivery route whereby the social rent units are retained within the HRA.
- 3.3. **Option 2**, the preferred option, is an alternative delivery option whereby Camden transfers the social rent homes to a Registered Provider (RP) such as the newly proposed Camden Living RP, as detailed in cabinet paper *Updating the Structure of Camden Living (SC/2022/48)* and transfers the intermediate homes to the existing Camden Living company. This would reduce the funding gap and thus reduce the amount of sale receipts required to deliver the first package of sites, or it could enable further development of more homes. It is expected that Camden Living RP will be established as a Registered Provider within the next 12 to 18 months, which will align with the delivery programme for this scheme. This option would require further borrowing by Camden Living RP to fund the purchase of these schemes in line with delivery programme.
- 3.4. **Option 3** would be to develop all 4 sites, as per the typical CIP delivery model, with a split tenure of private sales and affordable tenure. This would yield approximately 34 new affordable homes. This option does not achieve the desire to maximise affordable homes and as outlined earlier it is less suitable when developing small sites.
- 3.5. The 3 options are summarised in the table below. Note that the Supported Living Cluster (6 homes) has been removed from the comparison below as funding is already secured in full.

Option	Max no. of homes	Social Rent (SR)	Inter-mediate Rent (IR)	Private Sale (PS)	Council borrowing required	Grant funding	Asset sale required	SR homes in HRA
1	67	44 (65%)	23 (35%)	-	Yes (long term debt)	Yes	Yes	Yes
2	67	44 (65%)	23 (35%)	-	No	Yes	Yes	No <i>(transfer to CLRP)</i>
3	67	22	12	33	Yes (short term during build period)	Yes	No upfront sales – new homes sold on completion	Yes – but less than Option 1

4. **WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?**

- 4.1. **Financial Risk:** The key financial risk is that insufficient site sales are identified to fully fund the development package. If sufficient site sales are identified, then further risks could include a negative change to market values or delays to the timing or phasing of sales. There is great uncertainty in current markets, feeding into cost price inflation and affecting sentiment in property markets. The current programme assumes a 12 to 18-month programme from Cabinet approval to capital receipt. 12 months is considered to be a reasonable target for completions however land disposals are complex transactions and can be delayed. The business case includes additional contingency, however, if receipts received in this time period are inadequate or delayed there are alternative delivery options including: (a) Do less, delay bringing some sites forward immediately (b) explore options for additional grant (c) look at alternative delivery with a partner or sale of sites with consent.
- 4.2. **Planning Risk:** There is wide planning policy support for the development of small infill sites including Policy H2 of The London Plan. The sites identified as potential first phase sites have had an initial feasibility review and planning policy review and are deemed to be viable development opportunities, pending further detailed design development and investigation.
- 4.3. **Development Risk:** The programme includes general development risks including those around finance & funding availability; planning consent; construction costs and private market sales values / land values. Site specific development risks will be managed through initial site due diligence prior to commencing design development and then subsequently through the CIP development management procedures.
- 4.4. **Site Conditions:** Contamination of the site or below ground conditions can lead to programme delays and cost escalation. A first phase of site investigation has been undertaken on selected sites, and further intrusive work is expected to be undertaken through the development process.
- 4.5. **Communications & Engagement:** Risk of uncertainty and concerns due to lack of communication on estates. Stakeholder engagement has been a key element of the initial phase of this programme and engagement will be maintained through regular feedback with local people, updating on programme and future works. Ongoing working groups will progress through the construction phases. There is a risk of continued local opposition to new homes being built on estates. To address this will require clear and regular messaging with residents and tailored strategies for individual sites to address specific concerns raised and work collaboratively.
- 4.6. **Construction in Close Proximity to Residents:** Noise and dust can arise from construction, delivery vehicles, workers, and site compound. We aim to embed principles of MMC in the design and construction where possible that look to minimise impact of on-site construction. A Construction Management Plan will also be produced and will stipulate how noise, dust and deliveries will be managed to minimise disruption to residents.

5. **CONSULTATION/ENGAGEMENT**

- 5.1. An Equalities Impact Assessment (EQIA) has been carried out on the identified sites included in Stage 2 engagement programme and includes the 5 sites identified above for Package 1 delivery. This identifies that certain protected characteristic groups may be impacted more than others (See

Appendix 1.) The Council will endeavour to address the mitigation priorities set out in the report.

- 5.2. Ward Councillors have been consulted on the wider programme objectives, and individual sites in consideration for new homes, where applicable. Stakeholders such as adjacent residents and businesses along with neighbourhood forums have also been engaged with during this early stage.
- 5.3. To subsidise the engagement work on estates and through the 'Call for Ideas' webpage we have also held in-person youth engagement events to discuss the programme and seeking feedback regarding how young people in Camden are feeling about the development of small sites and the building of new homes in their communities.
- 5.4. The feedback and output from these workshops have been included in the overall engagement reports (Appendix 2 & 3) and will also inform the future engagement strategy through the New Homes for Small Sites Programme and the social value objectives through the design and delivery of the programme.

6. LEGAL IMPLICATIONS

- 6.1. Decision Makers must consider in coming to any decision the Council's equality duties and have due regard to them. In summary these legal obligations require the Council, when exercising its functions, to have 'due regard' to the need to: (a) eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act (the protected characteristic of marriage and civil partnership is also relevant); (b) advance equality of opportunity between people who share a relevant protected characteristic and those who don't; and (c) foster good relations between people who share a relevant protected characteristic and those who don't (which involves tackling prejudice and promoting understanding). Under the Duty the relevant protected characteristics are Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion, Sex, Sexual orientation. In this case the EIA concludes that there is no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken.
- 6.2. Further Legal comments are incorporated in this report.

7. RESOURCE IMPLICATIONS

- 7.1. This report seeks approval for a budget allocation in the sum of £1.248m. This will be used to fund the Design and Development of four sites to proceed to make a Planning Application. If approval is given, this will be chargeable to the Housing Revenue Account, with funding for the whole project coming from grants and disposals.
- 7.2. This report describes Phase One of the New Homes for Small Sites project that proposes to build 73 Affordable Housing units. The Council's Housing Revenue Account no longer has the capacity to fund projects such as this through borrowing. The project has been developed in a way in which it is possible to meet the whole costs of delivery through Government Grants, carefully selected disposals and potentially the transfer of the Affordable Housing units to Camden Living as a Registered Provider, without recourse to HRA Borrowing.
- 7.3. Further Finance comments are provided in Part II of this report.

8. ENVIRONMENTAL IMPLICATIONS

- 8.1 The programme will embed project management, design and construction requirements that address energy use, air pollution, resource efficiency and climate resilience that align with Camden's Climate Action Plan.
- 8.2 New homes will be designed to meet current planning policy and Building Regulations standards for environmental performance, as a minimum. Sustainable design, specification of energy systems, and high levels of fabric efficiency will contribute to lower energy use for residents to keep their homes warm, whilst minimising demand for fossil fuels.

9. TIMETABLE FOR IMPLEMENTATION

- 9.1. The proposed timetable and next steps are set out below in summary.

Date	Activity
Q4 2022/23	Commence Disposal Programme Development.
Q1 2023/24	Commence detailed assessment of sites shortlisted from 'Call for Ideas' and recommendation of sites for further action within Camden.
Q1 2023/24	Commence Design Team & Consultant Procurement.
Q2 2023/24	Gateway Approval - Consultant Appointments.
Q4 2023/24	Planning Application Submission.
Q4 2023/24 – Q2 2024/25	Completion of Disposal Programme.
Q1 2024/25	Planning Application Determination.
Q3 2024/25	Issue Invitation to Tender – Main Works
Q1 2025/26	Package 1 - Main Works Start on Site.
Q1 2026/27 – Q3 2026/27	Package 1 - Main Works Complete on Site. (Assume 12 - 18 months)

10. APPENDICES

Appendix 1. Equalities Impact Assessment

Appendix 2. Engagement Report – Stage 1 Engagement: Call for Ideas

Appendix 3. Engagement Report – Stage 2 Engagement: Local Conversations.

Appendix 4. Site Assessment Summary

PART II appendix – This appendix is not for publication as it contains exempt information relating to the financial or business affairs of any particular person (Including the authority holding that information).

REPORT ENDS