



Housing and Growth Committee

November 2021

Title	Small Site Modular Programme- at Reets Farm Close (NW9), Whetstone Close (N20), Park Road (EN4), and Manor Park Road (N2) ('the Sites')
Report of	Chairman of the Housing & Growth Committee - Councillor Richard Cornelius
Wards	Reets Farm Close (West Hendon) Whetstone Close (Totteridge) Park Road (East Barnet) Manor Park Road (East Finchley)
Status	Public with accompanying Exempt Report (not for publication by virtue of paragraph 3 of Schedule 12a of the Local Government Act 1972 as amended as this relates to information of a financial or business nature)
Urgent	No
Key	Yes
Enclosures	None
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Summary

This report sets out the proposal for twenty-two modular homes being developed across four sites with EDAROTH, a subsidiary of Atkins. EDAROTH develops under-utilised land using Modern Methods of Construction (MMC) to deliver high-quality affordable housing that is sustainable. These homes will be constructed using the latest modular building techniques, enabling 50% quicker delivery and which is also achieving net zero carbon, operational.

This opportunity enables Barnet to meet affordable housing targets outlined in the Borough's corporate objectives, while also developing more difficult small sites/land parcels. Upon completion, the project will deliver 18 new homes to be held in the Council's Housing Revenue Account (HRA) stock. It is proposed that all homes are rented at the Mayor's London Affordable (LAR) Rent level with Council secure tenancies.

Four additional homes will be for market sale on the Manor Park Road site, creating a c£1.868m net capital receipt for the General Fund available for either reinvestment or releasing pressure of borrowing elsewhere.

Details of the sites selected for this modular development are outlined below.

Officers Recommendations

- 1. That the Committee approves the list of Sites for development as outlined in this report**
- 2. That the Committee endorses in principle the development including the grant or disposal of any land interests, financing and income generating approach detailed for the Sites**
- 3. That the Committee approves EDAROTH as the party for the delivery of the Sites**
- 4. That the Committee notes the Council costs outlined in the report**
- 5. That the Deputy Chief Executive be authorised to take such actions and make such decisions to enable and facilitate the proposals set out in this report:**
 - (i) to include to appropriate the whole or part of the Sites including to planning purposes and to authorise any steps lawfully required in connection with the same; and**
 - (ii) to consider any objections in connection with any intended appropriation**
 - (iii) to dispose of any public open space land or any land appropriated pursuant to (i) above and to authorise any steps lawfully required in connection with the same**
 - (iv) to negotiate and settle any claims resultant on engaging s 203 of the Housing and Planning Act 2016; and;**
 - (v) to dispose of the Sites as outlined in this report; and**
 - (vi) to apply for all required statutory consents; and**
 - (vii) as otherwise may be required in accordance with all lawful requirements and as detailed at section 5.3**
- 6. That the Deputy Chief Executive be authorised In consultation with the Chairman of this Committee to :**
 - (i) approve and confirm that the Council may proceed with the development with EDAROTH in accordance with section 5.6.1 of this report**

(ii) to enter into and conclude such documents as required to give effect to the proposals outlined in this Report or agree alternative terms in consultation with the Chairman of the Housing and Growth Committee based on the broad principles outlined at 2 above and enter into and conclude such documents or to agree variations to any documents as may be required from time to time

7. That the Committee notes that the necessary adjustments will be made in the event of any appropriation of any HRA land as between the Council's HRA and General Fund Accounts as required

8. That the Committee notes that the budget allocation approval will not be confirmed until P&R in December 2021

1. Why this report is needed

- 1.1 The Assets, Regeneration and Growth Committee (ARG) approved at its meeting on 9 July 2014, the approach to, and the principles underpinning, the creation of a development pipeline on council owned land.
 - 1.1.1 The Council's Housing Strategy 2015-2025 sets out how the Development Pipeline will include the building of new homes on existing Council land held in the Housing Revenue Account (HRA) to be delivered by the Council's Arm's Length Management Organisation (ALMO), Barnet Homes.
 - 1.1.2 Barnet Homes has reviewed a number of the available HRA sites and identified those upon which, initially, 320 of the 500 projected target new homes could be built, e.g. unused garage sites within established residential areas or sites with capacity on poor quality amenity space, which could be improved as a result of development.
 - 1.1.3 On 17 March 2016 ARG approved the Outline Business Case (OBC) for Barnet Homes to make planning applications with a view to developing affordable homes on these sites and to expect a full business case for the transfer of the sites in September 2016.
 - 1.1.4 In December 2016, the Assets, Regeneration and Growth Committee (ARG) approved the Full Business Case (FBC) for the Development Pipeline Tranche 3 affordable housing programme. A number of smaller scale sites were outside the development cost per unit set in Tranche 3 and were transferred to a separate delivery programme, known as Microsites.
 - 1.1.5 The Microsites programme OBC was approved at ARG in September 2018 and gave delegated authority to the Deputy Chief Executive, in consultation with the Chairman of the Committee, to agree the terms of the development agreement and transfer the sites to Opendoor Homes.
 - 1.1.6 Reets Farm Close was a part of the Microsites 2 tranche and there was a previous investigation of development on this site. The OBC was taken to committee, but these were found to be financially unviable at the time and OpenDoor Homes did not

progress with the development.

- 1.1.7 A revised microsites development programme was approved September 2019, following the original FBC being rejected and decisions by Barnet Homes to return some sites back to the Council including the four small sites explored in this report. In addition to Reets Farm Close, Whetstone Close, Park Road and Manor Park Road were among these returned sites. Jubilee Gardens was also included in this tranche, but further development on the site was discounted due to constraints. This site has not been considered further in this report.
- 1.1.8 These four sites were being considered for disposal via the GLA small sites programme, however in parallel the Council worked with EDAROTH to develop a possible development solution utilising MCC technics, from this came the viable proposals outlined in this report.

Commercial Partner

- 1.2 EDAROTH is a wholly owned subsidiary of Atkins and has been created to deliver social and affordable housing. EDAROTH homes are manufactured offsite in the UK and meet the opportunity for Carbon Zero target based on the current building regulations definition which captures regulated (in use) emissions only. The homes are 10% above national space standards and offer a 100-year Build Offsite Property Assurance Scheme accreditation. Carbon emissions associated with onsite construction activities are less than 25% of the emissions associated with the construction of traditionally built UK housing. This is directly linked to manufacturing offsite and reducing time onsite, and therefore reducing energy usage requirements.
- 1.3 The Build Offsite Property Assurance Scheme (BOPAS) is a specialist building warranty for properties built using Modern Methods of Construction.
- 1.4 The BOPAS policy is based on a specialist risk based evaluation which demonstrates to funders, lenders, valuers and purchasers that homes built from non-traditional methods and materials are tested, checked and certified and they will be sufficiently durable as to have a certain life expectancy of a minimum of 60 years.
- 1.5 For funders and lenders, it provides confidence that the construction system is fit for purpose and removes any reservations or uncertainty concerning the construction methodology for valuation purposes.
- 1.6 Along with the above benefits, the BOPAS accreditation can offer the home/building owner lower life cycle costs and should there be any structural defects during the initial 10-year period, recourse to latent defect insurance.
- 1.7 This report sets out EDAROTH's proposal for delivering these objectives through modular development on small sites.

2. Reasons for recommendations

- 2.1 The Corporate Plan, Barnet 2024, includes several key priorities that the disposal and development of these sites will contribute to, including, ensuring decent quality housing, investing in communities and responsible delivery of major regeneration schemes.

- 2.2 The LBB Medium Term Financial Strategy 2019/24 and Budget for 2019/20 includes a substantial forward programme of income generating activities for the Estates Service and Housing Service collectively. The Reets Farm, Manor Park Road, Whetstone Close and Park Road sites are part of a rolling programme of site disposals and developments that contribute to this objective.
- 2.3 The population in Barnet is expected to increase by 16% from 391,500 to 466,500 by 2041. The recent Strategic Housing Market Assessment shows that there is a need to provide up to 3,060 new homes a year to accommodate this growth.
- 2.4 This directly tallies with the recently completed London Plan 2021 that sets a target for LBB to deliver 2,325 new homes per year up to 2028/29.
- 2.5 The Council has an important role to play in delivering Government targets for housing growth over the coming years. MHCLG published figures show that Barnet delivered just under 2,000 homes per annum in the three years to 2019, 86% of its current target.
- 2.6 To deliver an increase in housing completions requires the Council and the wider public sector to increase its own pipeline of housing delivery. To that end, the Council is reviewing its assets to consider all suitable sites for redevelopment potential.
- 2.7 With a third of the Borough in designated green belt, Barnet Council has to be innovative in how new homes can be built in the Borough.
- 2.8 The proposed 22unit scheme from these small sites will contribute to these targets and requirements.

Background

- 2.9 Reets Farm, Whetstone Close, and Park Road are garage blocks owned by the Council. These three sites are held in the HRA and it is intended that 18 units will be for affordable rent and 4 for open market sale on the site at Manor Park Road, which is held in General Fund. Following due diligence undertaken on the Sites, it has been established that the HRA sites comprise vacant housing land as defined in The General Housing Consents 2013.
- 2.10 The homes can be delivered using Modern Methods of Construction (MMC), which accelerates delivery. The three Housing Revenue Sites (HRA) will also generate a rental income back into the HRA account and additional Council tax.
- 2.11 The Council will secure vacant possession of the garages at Reets Farm, Park Road and Whetstone by serving the requisite notice on the occupiers. LBB will then grant EDAROTH on each site a short-term lease of approximately three years at a peppercorn rent. The leases will contain provisions to enable the Council to take back ownership of the land/ land and buildings.
- 2.12 The construction of the houses will use MMC, i.e. a panelised system fabricated offsite and assembled on site. This minimises construction challenges on small sites and enables a faster build programme- the frames are erected in two days, which means the project goes from foundations to a watertight structure in less than 48 hours. In using a prefabricated system, it also helps minimise logistical disruptions on site while achieving a better quality and durability. The MMC homes are of a highly

efficient energy building standard achieving typically an EPC of A. Generally, the efficient building envelope and use of renewable energy (i.e. Air Sourced Heat Pump or similar) means that heating bills will be around 50% lower than the a gas boiler system in a traditionally built home thereby helping to address the growing challenge of fuel poverty in the social and affordable housing sectors.

2.13 Proposed summary of deliverables (subject to planning): 22 homes. A mix of 83% will be affordable and 17% market sales, as well as a mix of 1, 2 and 3 bed homes.

- Reets Farm 3 no. affordable units
- Whetstone Close 3 no. affordable units
- Park Road 12 no. affordable units
- Manor Park 4 no Market Houses
- Jubilee Gardens Discounted as not viable (refer to Section 1.1.7)

2.14 For the affordable units in HRA, Barnet Homes will be responsible for letting and managing the properties in perpetuity

Appraisal strategy

2.15 EDAROTH have prepared an indicative development appraisal for each of the Sites, this has been reviewed by the Council's development and finance teams.

2.16 The assumptions in the appraisal are based on the following:

2.17 GLA grant of £100,000 per affordable home has been included.

2.18 Standard strip foundations, no contamination on site and services are assumed to be available.

2.19 Allowances have been made regarding demolition and flood mitigation for the Park Road site.

2.20 In addition to factoring in build cost inflation a further 10% contingency has also been reflected in the cost.

2.21 CIL and SDLT have been appropriately considered. Social housing relief from CIL will be sought on the HRA sites and any CIL liability at Manor Park Road will be met from the surplus generated.

Benefits

2.22 Developing these small sites using the EDAROTH MMC houses will create the following benefits for London Borough of Barnet:

- 22 New Homes with the majority being for London Affordable Rent
- Circa £1.868m net capital receipt for the General Fund
- HRA homes have a consistent net revenue surplus of c£0.019m per annum in the first 10 years, which tapers to £0.005m per annum in the subsequent 40 years to account for maintenance costs (excluding inflation)

- Estimated additional Council Tax income £37,422 per annum (assuming Band D across all 22 homes)
- Improvement of under-utilised garage sites
- Freehold retained by London Borough of Barnet on all but the homes that are sold on the open market (Manor Park)
- Delivery of homes that meet the net zero target based on the current building regulation definition of operational emissions
- End-to-End delivery by EDAROTH
- Development risk carried by EDAROTH

2.23 The leases will be granted for a nominal amount (at one pound). This is further explored in the legal section **Error! Reference source not found.** below.

3. Alternative options considered and not recommended

- 3.1 Do nothing with the sites- This option would not contribute to the increased supply of new housing and particularly affordable housing, nor the income generated from assets. If these sites are left undeveloped, they will not realise their full economic potential and there is an increased risk of continuing anti-social behaviour and fly tipping.
- 3.2 Disposal- There is the option to sell the sites onto the GLA portal and get a capital receipt. However, this doesn't deliver the Council's corporate objectives for providing housing in the borough. This also would not allow the sites to realise their full economic potential.
- 3.3 Preferred course of action- This report recommends developing the sites with EDAROTH's modular methods. This would increase affordable housing quota internally within the borough. Open market sales for the Manor Park units will also bring in revenue for the Council.
- 3.4 The option to develop the Manor Park Road site as market rent, in lieu of market sale, has been explored and the two options produce the following gains:
- Market Sale: £1,868,000 net capital receipt gain for the General Fund (at completion)
 - Market Rent: £1,950,000 net General Fund revenue gain (over 50 years)
- 3.5 The gain produced is comparable for both tenures. The key difference is the timescale – market rent delivers this over a 50year period, where market sale will provide an immediate return to the General Fund, which can be used to release pressure elsewhere, i.e. reducing borrowing or reinvested elsewhere.

4. Post decision implementation

- 4.1 Following Committee approval, a conditional agreement for lease (CAFL) will be drafted and entered into with EDAROTH, subject to formal board approval
- 4.2 Securing grant funding from GLA.
- 4.3 Serving notice when required to the garage tenants to obtain vacant possession.
- 4.4 Obtaining site surveys and title reports to de-risk delivery.
- 4.5 Preparing and submitting Planning application(s) for the developments
- 4.6 Upon the satisfaction of the condition's precedent in the AFL, the Council and EDAROTH will evaluate any cost adjustments to account for discharging any planning conditions and finalising land appropriation if required, and agree whether to proceed with the works. If agreed to proceed, contracts will become unconditional with the leases granted enabling EDAROTH to mobilise on site.

5. Implications of decision

5.1 Corporate Priorities and Performance

- 5.1.1 The Council's corporate plan sets out the aim to ensure Barnet is a pleasant, well maintained borough that is protected and invested in by:
 - Ensuring decent quality housing that buyers and renters can afford, prioritising Barnet residents that will be delivered by increasing supply to ensure greater housing choice for residents and delivering new affordable housing, including new homes, on Council-owned land.
 - Investing in community facilities to support a growing population, such as schools and leisure centres that will be delivered by investing in community facilities such as enhancing our indoor and outdoor sporting facilities and maintaining our 21st century libraries.
- 5.1.2 Responsible delivery of our major regeneration schemes to create better places to live and work, whilst protecting and enhancing the borough - delivered by working with The Barnet Group to deliver housing on smaller sites across the borough.
- 5.1.3 The Corporate Plan further sets out how the Council will deliver these ambitions within financial constraints by ensuring that taxpayers money goes as far as it can through adhering to the following key principles:
 - A fair deal - by delivering the services that matter most and making decisions to prioritise our limited resources alongside providing value for money for the taxpayer by ensuring we are transparent in how we operate.
 - Maximising opportunity - by taking a commercial approach to generating income, and looking for new opportunities to generate revenue from our estate, alongside capitalising on opportunities from responsible growth and development to boost the local economy

- 5.1.4 The London Plan 2021 and draft Local Plan recognise the need to deliver more housing in the borough. The Council's Housing Strategy 2019-2024 continues to emphasise that delivering more homes that people can afford is a key priority and sets out how the Council will deal with a number of challenges including high prices, a shortage of affordable housing and the potential threats to the qualities that make the Borough attractive.
- 5.1.5 Barnet's Health and Wellbeing Strategy recognises the importance of access to good quality housing in maintaining Well-Being in the Community.
- 5.1.6 Lack of affordable housing is highlighted in Barnet's Joint Strategic Needs Assessment (JSNA) as one of the top three concerns identified by local residents in the Residents' Perception Survey.

5.2 Resources

- 5.2.1 Key summary points of the recommended route (Manor Park in GF funded by capital receipts and the other 3 HRA sites funded by grant and PWLB):
- Manor Park is funded by capital receipts. At completion, c£1.868m general fund net capital receipt surplus would be generated from the market sale.
 - The 3 HRA sites are funded by a combination of the grant £0.100m per affordable unit and PWLB borrowing of £2.721m.
 - HRA sites- first 10 years net revenue is £0.019m per annum, and it tapers to £0.005m per annum for the subsequent 40 years to account for maintenance costs (excluding inflation).

5.3 Legal and Constitutional References

- 5.3.1 The Council's Constitution, Article 7 – Committees, Forums, Working Groups and Partnerships sets out the responsibilities of all Council committees. The H&G Committee's remit includes responsibility for:
- Housing matters including housing strategy, homelessness, social housing and housing grants, commissioning of environmental health functions for private sector housing
 - Regeneration strategy and overseeing major regeneration schemes, asset management, employment strategy, business support and engagement.
- 5.3.2 The three sites (Reets, Whetstone and Park Road) are all held in the HRA. S 32 (1) of the Housing Act 1985 states that without prejudice to the provisions of Part V (Right to Buy) a local authority has the power by this section, but not otherwise, to dispose of land held by them for the purposes of this part. Section 32(2) states that a disposal under this section may be affected in any manner but shall not be made otherwise than with the consent of the Secretary of State.
- 5.3.3 The General Housing Consents 2013 ("the 2013 Consent") allows for the disposal of Housing Land without SoS consent, provided that such disposal falls within the ambit of the General Consent.

- 5.3.4 The starting point for the General Housing Consents is that no land held in the HRA may be disposed of for a consideration less than is equal to its market value.
- 5.3.5 Paragraph A3.2.A of the 2013 Consent permits the disposal of vacant land i.e. land and assets that are not dwellings, at any price. The three above sites are considered to be vacant housing land because they do not comprise of any dwelling houses as that term is defined in the 2013 consent being only garages not associated with any dwelling or secure tenancy.
- 5.3.6 Manor Park Road is held in the General Fund (GF). The provisions relating to any disposal of GF land are governed by the provisions of s 123(2) of the Local Government Act 1972 ("the 1972 Act"). This states that except with the consent of the SoS no disposal of land shall take place under that section save by way of a short tenancy, except for a consideration not less than the best that can be reasonably obtained.
- 5.3.7 Section 123(7) of the 1972 Act states that a short tenancy comprises the grant of a term for less than seven years. The proposed leases to EADROTH do not therefore qualify as a disposal for s 123 purposes and therefore the proposed premium of £1 is permissible pursuant to s 123(2). The Council's Constitution has taken for the purposes of the interpretation of Table A Article 10.9 that disposal has the same meaning afforded to it by section 123. As such s 123 does not apply and it does not constitute a disposal for the purposes of the Council's Constitution. It follows that no SoS is required either.
- 5.3.8 Where any parts of the Sites comprise public open space and such land is no longer required for the purposes for which it is currently held the land will need to be appropriated to the proposed alternative use or to planning purposes pursuant to s122 of the 1972 Act. The Council will at the direction of the Deputy Chief Executive in accordance with the recommendations outlined in this report be required in such cases if it intends to appropriate public open space land to first both advertise such intention for not less than 2 consecutive weeks in a local newspaper and then to consider any objections to such appropriation in reliance on the provisions of s 122 (2A) of the 1972 Act prior to making any such decision . Any intended disposal of the land must also be advertised by the Council for two consecutive weeks in a local newspaper in accordance with s 123 (2A) of the LGA 1972 or s 233 (4) of the Town and Country Planning Act 1990 if such land has first been appropriated to planning purposes and proper consideration given to any objections received relating to such intention to dispose prior to any decision to dispose being confirmed. Any HRA land appropriated to planning purposes cannot be disposed of at less than best consideration except with the consent of the SoS (s 233(3)) except if it is a grant of a lease of less than 7 years or an assignment of an existing lease which has less than 7 years to run. The consent of the SoS is not envisaged as being required for the HRA sites and will not arise in respect of Manor Park which is a disposal at market value.
- 5.3.9 S 122(1) of the Local Government Act allows a local authority to appropriate land which is no longer required for its current use to another use. The effect of appropriating land to planning purposes is that it engages the provisions of sections 203 of the Housing and Planning Act 2016 the effect of which is to override any covenants restrictions or third party rights which would otherwise impede the development. The affected parties' rights are commuted into claims for compensation dependent on those claims being valid. The Council will be required to settle any valid

claims with the relevant party whose rights have been overridden. Before considering whether or not to appropriate the Council must be able to demonstrate that it has a legitimate and lawful basis for making its decision to appropriate. HRA land appropriated to planning purposes is automatically re-sited to the GF with required accounting adjustments required to be made between the two accounts to compensate the HRA for the market value of the land transferred.

5.3.10 S 123(1) allows a local authority to dispose of land held by them in any manner they wish subject to the remaining provisions of that section.

5.3.11 Section 1(1) of the Localism Act 2011 confers a general power of competence on local authorities which permits them to do anything that private individuals may do but this is subject to the general principles of public law. The Council will need to have regard to the account in which the housing stock is ultimately to be held and the provisions of section 74 of the Local Government and Housing Act 1989 including any financial adjustments between the Council's General Fund and the Housing Revenue Accounts which may be required to be made.

5.3.12 Section 4 of the Localism Act 2011 enables the Council to do for a commercial purpose anything that it is empowered to do under section 1 of the 2011 Act provided that they do so through a company.

5.3.13 Section 95 of the Local Government Act 2003 allows a local authority to do for a commercial purpose anything that they are authorised to do for carrying on any of their ordinary functions.

5.3.14 Any stock that is intended to be let as affordable rent housing will be held for the purposes of part II of the Housing Act 1985 and accounted for through the Council's HRA Account with any adjustments required made to reflect if relevant the value of the land being transferred between the HRA and GF accounts.

5.3.15 Public procurement rules do not apply to the proposed arrangements because they are predominantly land contracts/transfers outside the ambit of The Public Contracts Regulations 2015, and the legal agreements will not impose any contractual obligations on EDAROTH to carry out and complete the works, and the Council will not be specifying the work or exercising a decisive influence on the type or design of the work

5.4 **Insight**

5.4.1 The Council's Housing Strategy and emerging Local Plan respond to evidence such as the Strategic Housing Market Assessment and other needs assessments that have identified a need for increased housing delivery.

5.5 **Social Value**

5.5.1 Increasing the utility of existing assets through mixed use redevelopment will enable the Council's portfolio of assets to go further towards supporting local needs by helping to provide new opportunities for housing, (in particular, affordable housing) and new, improved community facilities.

5.5.2 Any contractors or parties involved in the development will be encouraged to provide opportunities for employment, training and apprenticeships for local people and use

local suppliers where appropriate.

5.6 Risk Management

- 5.6.1 EDAROTH will carry out most of the necessary works, surveys and investigations “at risk”. When EDAROTH decides to develop the sites with the modular homes and proposes a final fixed price for the Council to purchase the modular homes, the Council can decide if it wants to proceed with the development. If the costs to the Council are deemed excessive or unreasonable, it will be in a position to stop the matter, reimbursing EDAROTH for only costs incurred for site surveys and planning designs, and as such, the risk to the Council is limited.
- 5.6.2 Once planning application and the subsequent site possession have been granted, both EDAROTH and the Council will undertake a review of the cost taking into consideration any adjustments incurred to discharge planning conditions and/or finalising land appropriations if required. When both parties agree to proceed with the works, any work carried out in relation to the boundary walls and the demolition of the derelict garages poses little to no risk as the land is Council owned.
- 5.6.3 Risks will be assessed and recorded on a risk register by the Council’s professional team and site monitoring will be undertaken at regular agreed intervals.
- 5.6.4 Allowance has been made for site anomalies, which will be firmed up with surveys if the proposals are taken forward.
- 5.6.5 Planning risk can either add or remove value however this is borne by the developer.
- 5.6.6 Construction risk- All development and construction risk are borne by the developer
- 5.6.7 Market risk- External agency reports have been produced a detailed report included valuation will be commissioned prior to entering into an agreement to lease
- 5.6.8 Funding Risk- No direct funding obligations, the 20% deposit on financial close is refundable to the Council t
- 5.6.9 Currently EDAROTH has in principle approval from its Board to proceed with the proposals. EDAROTH has advised that the final approval of its Board is required prior to the Agreements for Lease being exchanged and as such no absolute assurance can be provided prior to that time.

5.7 Equalities and Diversity

- 5.7.1 The 2010 Equality Act outlines the provisions of the Public-Sector Equalities Duty which requires Public Bodies to have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
 - Advance equality of opportunity between people from different groups and foster good relations between people from different groups.
- 5.7.2 Any Equalities Impact Assessments will be undertaken on individual schemes as they are brought forward, and the proposals outlined will give appropriate consideration and

where required consider any matters raised in these assessments. However, the proposals in this report are not considered at this stage to raise any negative impacts for equalities and demonstrate that the Council has paid due regard to equalities as required by section 147 of the Equality Act 2010

5.8 Corporate Parenting

5.8.1 None in the content of this report.

5.9 Consultation and Engagement

5.9.1 Consultation and Engagement plans will be developed for sites that are deemed suitable for development and stakeholder engagement undertaken as the designs progress.

5.9.2 Neighbours will be consulted through the planning process with particular attention paid to those immediately adjacent to the sites who may be impacted by the building works.

5.9.3 Public consultation(s) will be agreed with Planners to ensure appropriate opportunity for public feedback.

5.10 Environmental Impact

5.10.1 Modern Method of Construction (MMC) offer considerable environmental advantages. Benefits of offsite modular construction including less construction waste, fewer vehicle movements to site, which also equates to less noise, dust and transport-related emissions in the area and less CO2 produced during construction (Refer to Section 1.2 and 2.12 for more information).

5.10.2 The finished buildings are of a highly efficient energy building standard achieving typically an EPC of A, therefore significantly reducing operational costs and the associated CO2 emissions (Refer to Section 1.2 and 2.12 for more information).

6. Background papers

6.1 None