



Cambridge City Council

Housing Scrutiny Committee

Date: Thursday, 20 January 2022

Time: 5.30 pm

Venue: Council Chamber, The Guildhall, Market Square, Cambridge, CB2 3QJ

Contact: democratic.services@cambridge.gov.uk, tel:01223 457000

Second Circulation Agenda

Agenda item 7 (Housing Revenue Account Budget Setting Report) was published 17.12.21, this report can be found on the website under 'Agenda Reports Pack'. This second circulation agenda contains all of the reports excluding agenda item 7.

Part 1: To be chaired by Vice Chair (Tenant/Leaseholder Representative)

Decisions for the Executive Councillor for Housing

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| 5 | Estates & Facilities Compliance Data | (Pages 5 - 10) |
| 6 | Procurement of Contractor(s) to Deliver Energy Efficiency Improvements and Works to Reduce Carbon Emissions From Council Housing | (Pages 11 - 20) |

Part 2: To be taken by the Chair of the Committee

Decisions for the Executive Councillor for Housing

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| 8 | Report on Hanover and Princess Courts and Kingsway Flats | (Pages 21 - 52) |
| 9 | Update on New Build Council Housing Delivery | (Pages 53 - 122) |
| 10 | Cambridge City Caravan Site Licensing Policy | (Pages 123 - 194) |
| 11 | Approval of the 'Streets to Home service' budget | (Pages 195 - 210) |
| 12 | Homelessness Prevention Grants to Agencies 2022-23 and proposed associated reallocation of funding | (Pages 211 - 222) |

Housing Scrutiny Committee Members: Bird (Chair), Sheil (Vice-Chair), Bennett, Dalzell, Gawthrope Wood, Gilderdale, Lee, Pounds and Robertson

Alternates: S. Davies, Page-Croft, Sargeant and Sweeney

Tenants and Leaseholders: Lulu Agate (Tenant Representative), Christabella Amiteye (Tenant Representative), Diane Best (Leaseholder Representative), Mandy Powell-Hardy (Tenant Representative), Diana Minns (Tenant Representative) and Colin Stevens (Tenant Representative)

Executive Councillors: Todd-Jones (Executive Councillor for Housing)

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Whilst the situation with COVID-19 is on-going, the Council will be following the latest Government guidance in organising and holding its meetings.

This Meeting will be live streamed to the Council's YouTube page. Those wishing to address the meeting will also be able to do so virtually via Microsoft Teams. Given the ambition to limit numbers of people attending the meeting in person to reduce the risk of infections we would encourage members of the public who wish to address the Committee to do so virtually.

Should you have to attend in person, we always ask you to maintain social distancing and maintain your face covering unless you are exempt or when speaking at the meeting. Hand sanitiser will be available on entry to the meeting. It is advisable that a lateral flow test 24hrs before the meeting is taken.

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Housing Scrutiny Committee

Terms of Reference	
A.	Overview and scrutiny of the strategic and other housing functions for which the Executive Councillor for Housing is responsible, including responsibility for the development of housing strategies and policies, tackling homelessness, the Council's housing responsibilities with regard to the private rented sector, bringing vacant homes back into use, the development of new homes and partnership working with other housing providers.
B.	Overview and scrutiny of functions relating to the management of the Council's housing stock.
C.	To be the main discussion forum between the Council, its tenants and its leaseholders for all matters relating to the landlord function of Cambridge City Council.
Membership	
	City Councillors (Such number as shall be decided by the Council from time to time)
	Six elected tenants and leaseholders of Cambridge City Council of whom at least five shall be tenants of Cambridge City Council.
Appointment of tenant and leaseholder members	
	Tenant and leaseholder members shall be co-opted by the Scrutiny Committee following the procedure for election set out in the Overview and Scrutiny Procedure Rules in Part 4E.
Voting	
	Tenant and leaseholder members are voting members in respect of matters concerning the management of the Council's housing stock (Part 1 of the agenda.) Tenant and leaseholder members may contribute to discussion of other matters (Part 2 of the agenda) but shall not have a vote.
Appointment of Chair	
	The Chair of the Scrutiny Committee shall be appointed by the Council and be a councillor and shall chair Part 2. The Vice-chair shall be nominated by the elected tenants and leaseholders and shall chair Part 1 if present. If the Chair or Vice-chair is not present, a councillor shall be appointed as the Vice-chair for that meeting.
Other matters relating to elected tenants and leaseholders	
	These are set out in the Overview and Scrutiny Procedure Rules in Part

4E. They include information about the roles, responsibilities and training of tenant and leaseholder representatives, expenses and allowances, and the circumstances in which they may cease to be members of the Committee.



Item

Compliance Update

To:

Housing Scrutiny Committee

20th January 2022

Report by:

Gareth Basterfield – Interim Risk Assurance and Compliance Manager

Tel: 01223 458685 Email: gareth.basterfield@cambridge.gov.uk

Wards affected:

All Wards

This report is for information and not for decision.

1. Executive Summary

The report provides an update on the compliance related activities delivered within the Estates & Facilities Team, including a summary on gas servicing, electrical testing and fire safety work.

2. Recommendations

The Executive Councillor is recommended to note current position of the Council regarding Compliance, and the progress of ongoing associated works.

3. Compliance Update

The Interim Risk and Compliance Manager (RACM) is still with the Council; however, a new Risk Assurance and Compliance Manager has been appointed and starts the role in January 2022.

The RACM has been conducting an audit and review of the existing processes, procedures, policies and contracts. The key compliance areas

making up the parts of the review are Gas Safety, Fire Safety, Asbestos Management, Legionella & Water Hygiene, Passenger & Specialist Lifting Equipment and Electrical Safety.

3.1 Gas Safety

Mears continue to deliver a good service, achieving high levels of access and a continued 100% compliance rate.

3.2 Fire Safety

The following table is the current planned and on-going fire safety works:

Task	Progress	Target Completion
Fire Doors and Compartmentation to above 188 above ground maisonettes	A new contractor appointed 1 st December 2021 due to failure of previous contractor. Expected to finish programme by April 2022.	April 2022
Fire Doors at Kingsway, Hanover and Princess	97% of doors completed with access an issue with the others. Doors still on programme but focus is now on other blocks. Works are being reviewed due to the potential redevelopment of the blocks.	2021/22
Emergency Lighting – Hawkins Road Estate	Works are now completed and lights operational. There is a small issue with the lights as they are continuously on but the manufacturer is going to visit site to assist with programming.	Completed
Vents and Cladding at 88 Buildings	Decision made not to proceed with these works as benefits would be minimal.	Removed
Fire Alarm - Kingsway	Final quote received and specification finalised. Project requires project manager which is currently being arranged.	March 2022
Fire Alarm – Hanover & Princess	Once final quotation and specification for Kingsway is finalised the Council will use this as a basis to design the alarm being fitted in Hanover & Princess.	March 2022
Compartmentation Works - Kingsway	Requirements currently under review	TBC
Compartmentation Works – Hanover & Princess	Requirements currently under review	TBC

3.3 Legionella & Water Hygiene

A programme of carrying out Water Hygiene Risk Assessments is currently underway. No issues have been identified in regard to the Councils ongoing management of Legionella Risks.

Processes currently being developed for data to be held on Orchard Asset.

3.4 Electrical Safety

Recruitment of M&E Programme Delivery Manager continues to be challenging with multiple filled rounds of recruitment so far.

3.5 Passenger Lifts & Specialist Lifting Equipment

A review of the Lifts Programme delivery arrangements will be completed once the M&E Programme Delivery Manager is filled.

No current issues exist and all of the Council's lifts are being serviced regularly.

3.6 Asbestos Management

The Council has recently implemented its new Asbestos Register which is easily accessible to the relevant staff. The register enables easier searching for the location of all the Council's known Asbestos.

4. **Hanover Court, Princess Court & Kingsway**

Only 1 property is now awaiting the delivery and installation of a cooker which is delayed due to stock issues. There continues to be 2 refusals.

A decision has been made to proceed with the installation of electrical heating at Kingsway; but is currently on hold at Hanover & Princess until a decision on the future of the building has been made (or become more clear).

Cadent will begin removing their assets in January 2022.

5. **Compliance Dashboard**

The Compliance Dashboard is attached Appendix A.

6. Implications

6.1 Financial Implications

There are no new financial implications directly relating to the content of this report.

6.2 Staffing Implications

There are no new staffing implications directly relating to this report. The service review restructure holds staffing implications that are dealt with through the organisational change policy, formal consultation, and implementation process.

6.3 Equality & Poverty Implications

There are no new equality and poverty implications associated with this report. An EQIA has been developed for the service restructure and is included within the formal implementation papers.

6.4 Environmental Implications

There are no new environmental implications directly relating to the content of this report.

6.5 Procurement Implications

There are no new procurement implications directly relating to the content of this report.

6.6 Consultation and Communication

Consultation with tenant and leaseholder representatives is an integral part of the Housing Scrutiny Committee.

There has been a significant level of consultation with tenants and leaseholders of the Hanover, Princess and Kingsway and this continues to happen in coordination with the HDA with regards to the future of the buildings.

6.7 Community Safety

The actions taken at Hanover, Princess and Kingsway have significantly improved the safety of residents within the building and with the plan outlined above will remove the risk of gas explosion entirely.

7. Background Papers

If you have a query on the report please contact Gareth Basterfield – Interim Risk Assurance and Compliance Manager, Tel: 01223 458685, email: gareth.basterfield@cambridge.gov.uk.

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Item

Procurement of contractor(s) to deliver energy efficiency improvements and works to reduce carbon emissions from Council Housing

To:

Councillor Mike Todd-Jones, Executive Councillor for Housing
Housing Scrutiny Committee 20th January 2022

Report by:

Lynn Thomas, Head of Housing Maintenance and Assets
Tel: 01223 - 457831

Email: Lynn.thomas@cambridge.gov.uk

Wards affected:

Arbury

Key Decision

1. Executive Summary

The Council commissioned a report in 2021 to establish a high-level cost estimate of how the Council can retrofit existing Council properties to be net zero carbon. This report seeks approval for a pilot project to retrofit up to fifty Council properties to establish the actual cost and methodology of achieving net zero carbon in existing Council properties.

2. Recommendations

The Executive Councillor is recommended to:

Approve the issue of tenders and authorise the Director of Neighbourhoods and Communities to award a contract(s) to a contractor(s) to deliver energy efficiency works and works to reduce carbon emissions from Council housing in 22/23 and 23/24, with an option to extend for one or more periods up to a maximum of two years.

3. Background

The Council's Climate Change Strategy 2021-2026 sets out *"a vision for Cambridge to be net zero carbon by 2030, subject to Government, industry and regulators implementing the necessary changes to enable the city and the rest of the UK to achieve this."*

In line with this vision and following the results of the "Achieving net zero carbon in our existing Council Housing Stock September 2021" report from Fielden and Mawson, further work is required to establish the actual costs of achieving net zero carbon in the Council's existing housing stock and the technical feasibility of various options.

The Council's current housing asset management strategy sets out objectives to improve the energy efficiency performance of the existing housing stock and to start to investigate costs and ways of achieving this in 2020/21. We are also working toward a government target to achieve EPC "C" for all our properties by 2030.

One of the key areas we need to address to achieve this target is insulation of solid walls. The Council has around 1300 properties that were built with solid walls many of which have an EPC rating of "D" where these have not been insulated.

Our current programme of external wall insulation (EWI) combined with solar PV panels has achieved EPC "B" on most properties ("C" on some). The most recent phase of this work began in September 2021 and will be delivered to the retrofit standard: PAS2030:2019.

We are continuing to develop this programme to improve solid walled and other "D" rated properties, so they achieve a minimum EPC rating of "C." However we want to do this with a "No Regrets" approach. This means we want to carefully plan work so that we do not need to return to properties in

the future and change any existing energy efficiency measures to meet net zero later.

Most of our Council properties have gas boilers for space and water heating. We are looking at replacement of gas heating systems in the longer term. In line with government advice and good practice we are planning to adopt a “whole house” approach to decarbonization and energy efficiency.

3.1 “Achieving net zero carbon in our existing Council Housing Stock - September 2021” report from Fielden and Mawson

Following a report by consultants Buro Happold showing how our new build housing could reach net zero carbon (the “Passivhaus” standard is being adopted for all new build housing from 2024), consultants Fielden and Mawson were appointed to deliver a report for our existing Council housing stock.

Fielden and Mawson’s report made recommendations for measures that could be used to achieve net zero carbon in the Council’s existing housing stock and included high-level cost estimates for our most common housing archetypes (covering most of our stock). The estimated costs and housing archetypes are shown in the table below:

Archetype	Description	Estimated cost to achieve net zero (over and above Decent Homes standard) including all fees, design costs and contingencies
1	2-bed maisonette	~ £61,000
2	1-bed low-rise flat	~ £66,000
3	1-bed medium-rise flat	~ £56,000
4	1-bed post war bungalow	~ £79,000
5	2-bed pre-1945 semi	~ £101,000
6	2-bed post-1945 semi	~ £87,000
7	2-bed post-1945 Victorian end terrace	~ £82,000

Note regarding costs for different archetypes

Typical properties in the Council’s existing housing stock were used for estimating costs for each archetype. The biggest variable is insulation of the building fabric and this varies according to the area of external wall to be treated. For archetype seven internal wall insulation is proposed and this reduces the estimated cost.

Our proposed plan is to develop and deliver a pilot project of around fifty properties that will test the proposals in the Fielden and Mawson report.

The pilot project will aim to transform EPC “D” rated houses to “net zero carbon” standard (or as close as can be achieved) using a whole house approach to retrofit that will comply with the PAS 2035 standard (PAS 2035:2019 Specification for the energy retrofit of domestic buildings).

The pilot project will focus on a street approach to “Archetype 5” properties (two-bed, pre-1945, semi-detached houses) however additional archetypes will be included where possible.

The pilot project will allow us to verify the assumed costs, fees, and contingencies in the Fielden and Mawson report and to also identify any unforeseen difficulties delivering a whole package of measures in occupied properties.

The results from the pilot project should place us in a strong position to make informed decisions about the rest of our housing stock in future and develop designed solutions that can be replicated for future energy efficiency and decarbonization works on the Council’s existing housing stock.

As part of the development of a full design, embodied carbon (carbon footprint of a material) will be assessed, and materials incorporated to minimise or reduce the embodied carbon impact of the project.

3.2 Proposed retrofit measures and estimated costs for two-bedroom, pre-1945 semi-detached house

The planned package of retrofit measures as recommended in the Fielden and Mawson report include (subject to full design):

- External wall insulation (EWI) with air tightness improvements (using “EnerPHit” retrofit method, equivalent to “Passivhaus”)
- Solar Photovoltaic (PV) panels
- Replacement doors and windows within the insulation zone
- Air source heat pumps (ASHP) to replace gas boilers (or make properties ASHP ready)
- Hot water cylinders
- Mechanical ventilation
- Underfloor insulation (where possible)
- Loft insulation top ups

Measure	Estimated cost of retrofit work required based on Fielden and Mawson report
External Wall Insulation	£22,000
Perimeter insulation (below DPC)	£10,300
Roofline works	£7,200
Triple Glazing / Doors	£10,000
Solar Photovoltaic panels (PV)	£6,800
Mechanical Ventilation and Heat Recovery	£1,500
Scaffolding / Access	£3,500
Render	£4,800
Air source heat pump	£7,500
Works estimated sub total	£73,600
Preliminaries, overheads and profits, professional fees	£28,530
Contingency	£10,060
Total - works and fees	£112,190
Inflation to 3Q21 to 3Q 2022 @4.7%	£5,609
TOTAL – works, fees and inflation	£117,799 per property

Notes on estimated costs

Total estimated cost includes cost of retrofit works, contractor's costs, design costs and contingency based on September 2021 costs and inflated to 3rd quarter of 2022.

Tender prices are currently volatile and unpredictable, and the project may be affected by labour and material shortages.

The actual contract sum will be agreed following the completion of the design and tender process. This may also include other planned maintenance works that may be carried out at the same time.

4. Implications

a) Financial Implications

A £5m budget for a net zero carbon pilot project is already included in the housing capital investment plan for 2022/23 (in addition to an existing allocation of £1m for energy efficiency works). It is likely that delivery of the project will extend into 2023/24 so the capital budget will need to be re-phased to take account of the actual delivery programme.

The cost of any other planned maintenance work that can be scheduled to take place at the same time as retrofit works (e.g., electrical work, roofing work) can be met within the existing housing capital investment plan.

b) Staffing Implications

The work will be managed by the Estates and Facilities in house team, supported by external consultants as required.

The Council's legal team and Corporate Procurement Manager will provide contract and procurement advice.

City Homes staff will be involved with planning and consultation processes.

The Council's Climate Change team in Corporate Strategy will be involved with the project.

The Council's Environmental Quality team dealing with private sector retrofit projects will be involved with the project.

c) Equality and Poverty Implications

An Equality Impact Assessment has been completed.

The works will improve the energy efficiency of Council houses and should result in lower energy bills for tenants.

d) Environmental Implications

The Council's climate change rating tool has been completed to assess the environmental implications of this proposal.

The assessment is that there is positive net overall impact.

e) **Procurement Implications**

Works

Routes for procurement are currently being explored with options including:

- Existing frameworks contracts
- Conducting a full competitive tender, likely to be subject to public procurement regulations

Additional services to be procured include:

- Architect services
- Cost consultancy services
- Retrofit coordinator services
- Other specialist professional services

f) **Community Safety Implications**

N/a

5. Consultation and communication considerations

All residents affected by this proposed project will be informed about the proposed work and the potential energy, carbon, and financial savings.

Detailed consultation will be carried out before work starts including:

- an on-site resident consultation day to give information about the proposed work and collect feedback and comments
- personal visits to each resident to explain the work and identify any special requirements
- information and support in the use of energy efficiency measures

Estates and Facilities will work closely with the Environmental Quality team who are developing strategies for private sector housing.

A planning application will be required as the work will result in a change of appearance to the properties.

Party Wall notices may be required where Council properties adjoin freehold properties.

Glossary

Net zero carbon	<p>Net zero carbon means that carbon emissions cannot exceed zero. In practice, a net zero carbon target means that in addition to phasing out fossil fuels and the role of renewable energy and energy reduction measures, there is also a role for balancing a certain measured amount of carbon released with an amount of carbon offsets, though, for example, tree planting or carbon capture and storage.</p> <p>(Definition taken from North East Cambridge Area Action Plan)</p>
EPC	<p>Energy Performance Certificates are needed whenever a property is: built, sold, or rented and are valid for 10 years.</p> <p>An EPC contains information about a property's energy use and typical energy costs and recommendations about the measures that can be installed to reduce energy use and save money.</p> <p>Energy Performance Certificates tell you how energy efficient a building is and give it a rating from A (very efficient) to G (inefficient). They tell you how costly it will be to heat and light your property, and what its carbon dioxide emissions are likely to be.</p>
PAS 2035	<p>PAS 2035 is the Publicly Available Specification that covers all retrofit energy efficient enhancements to the UK's existing housing stock.</p>

	<p>PAS 2035 is an over-arching document in the retrofit standards framework introduced following the recommendations of the Each Home Counts review. PAS 2035 provides a specification for the energy retrofit of domestic buildings, and details best practice guidance for domestic retrofit projects.</p> <p>Any retrofit designs that emerge from its specifications must be installed in accordance with the requirements outlined in PAS 2030.</p>
PassivHaus	<p>Passivhaus is a quality assured standard and methodology for low energy building.</p> <p>Passivhaus design seeks to eliminate the need for space heating and cooling and is based on the principle that reducing heating loss to a minimum is the most cost-effective and most robust way of achieving a low carbon building. Passivhaus design relies on maximising the use of super insulation and stringent airtightness and paying meticulous attention to the removal of thermal bridges. By combining this with passive solar gain and mechanical ventilation and heat recovery systems, Passivhaus design can create healthy, comfortable buildings needing minimal heating.</p>
EnerPHit	<p>EnerPHit is a slightly relaxed Passivhaus standard for retrofit projects, where the existing architecture and conservation issues mean that meeting the Passivhaus standard is not feasible.</p>
Retrofit Co-ordinator	<p>Retrofit Co-ordinators are required for all domestic retrofit projects to comply with PAS 2035. The Retrofit Coordinator is a project management role within the</p>

	retrofit process. They are responsible for overseeing a domestic retrofit project from inception to completion, and will liaise with building owners, and other retrofit project stakeholders in order to ensure effective project management.
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6. Background papers

“Achieving net zero carbon in our existing Council Housing Stock September 2021” report from Fielden and Mawson

Cambridge City Council – Interim Sustainable Housing Design Guide
Four Steps to Zero Carbon – report by Buro Happold
7 May 2021 - Revision P05

Cambridge City Council Climate Change Strategy 2021-26

7. Appendices

None

8. Inspection of papers

To inspect the background papers or if you have a query on the report please contact Will Barfield, Asset Manager

Tel: 01223 457843

email: will.barfield@cambridge.gov.uk

or

Juliet Nicholas, Corporate Energy Manager

Juliet.nicholas@cambridge.gov.uk



Item

Report on Hanover and Princess Courts and Kingsway Flats

To:

Councillor Mike Todd-Jones, Executive Councillor for Housing
Housing Scrutiny Committee 20/01/2022

Report by:

Claire Flowers, Head, Housing Development Agency
Tel: 01223 - 45 7928 Email: Claire.Flowers@cambridge.gov.uk

Wards affected:

Arbury, Market

1. Executive Summary

- 1.1. At Housing Scrutiny Committee on 23rd September 2021 it was noted that the programme of review of estates will be carried forward including survey work and consultation with residents to include Hanover and Princess Courts and Kingsway.
- 1.2. In November 2021 outdoor consultation events were held at Hanover and Princess Courts and Kingsway. There was a good level of response to the survey at Hanover and Princess Courts (39 responses) but less so from Kingsway (14 responses).
- 1.3. In the case of both Hanover and Princess Courts and Kingsway the buildings are potentially beyond economic viability when set against current standards. Refurbishment options and redevelopment options have been considered in outline. Both options have limitations. Redevelopment would produce an increase in the number of dwellings but due to the existing density and site constraints are unlikely to be able to deliver significantly more homes. Outline consideration of refurbishment

options indicate that because they were not constructed using a steel or concrete frame and because ceiling heights are below current standards there would be limits to the scope for refurbishment.

1.4. These options can be considered in more detail with residents. The initial response to the survey indicated that a majority of respondents at Hanover and Princess Courts favoured regeneration. Most understood this to mean redevelopment but a significant minority wanted to see refurbishment. A much smaller group being unsure or wanting a maintenance only approach. The much smaller set of responses at Kingsway favoured redevelopment.

1.5. A frequent response in the consultation was a request for certainty and timescales. Redevelopment will require residents to move. Major refurbishment would be facilitated by residents moving; whether this is absolutely required would depend upon the nature and extent of the works.

1.6. The Council has a considerable amount of stock in the north of the city to create options for tenants to move but very limited housing stock close to the city centre. There is a unique opportunity for Council tenants at Hanover and Princess Courts to move into homes currently being constructed by the Cambridge Investment Partnership on two sites off Mill Road and Cromwell Road. 212 homes will be available in the course of 2022 and early 2023. Half of the homes will be handed over in the first six months of 2022 and most of the rest by the autumn.

1.7. If this unique opportunity is to be taken it is necessary to facilitate the offer to move immediately. Residents will be advised that a final decision on regeneration has not been taken; moves will not be made other than by agreement of residents prior to a decision. The recommendations include specific provisions to enable this approach.

1.8. This approach would indicate a faster timeline to determine the future of Hanover and Princess Courts than Kingsway. Adjustments to the HRA business plan to reflect this are set out in the Budget Setting Report. A programme for Kingsway will also be considered.

2. Recommendations: The Executive Councillor is recommended to:

2.1. Note the progress made to date towards identifying the most favourable improvement route for the Hanover and Princess Courts and Kingsway flats and the outcome of the initial consultation exercises

- 2.2. Approve commencement of a consultation process for Hanover and Princess Court residents including redevelopment and refurbishment options.
- 2.3. Approve a decant process with immediate effect in advance of a decision on the future of Hanover and Princess Courts including deviation from the Lettings Policy position that those decanting are given emergency housing status when the required vacant possession date is within 12 months.
- 2.4. Delegate authority to the Head of Housing to amend the Local Lettings Plans for the Mill Road and Cromwell Road developments to allow for direct lets for residents interested in moving from Hanover and Princess Courts.
- 2.5. Approve with immediate effect the purchase of the leasehold interest of flats in Hanover and Princess Courts and the issue of Home Loss and Disturbance payments to qualifying Council tenants and Basic Loss and Disturbance payments to qualifying leaseholders affected by the potential redevelopment
- 2.6. Approve the development of a project plan for appraisal work on Hanover and Princess Courts and a management plan for Kingsway including the development of plans for communication and engagement with residents and owners and associated.
- 2.7. Note the required adjustments to the HRA Business Plan, adjustments to the works budgets and recognition of the phased rent loss that would be anticipated due to vacating flats at Hanover and Princess Courts.
- 2.8. Approve the amendment to the Lettings Policy detailed at 6.13 and Appendix C

3. Background to estate regeneration

- 3.1. At the Housing Scrutiny Committee on 23rd September 2020 Cambridge City Council committed to a new delivery programme with a target of 1000 new Council homes, building on the success of the 500 homes programme funded by the Ministry of Housing, Communities and Local Government.
- 3.2. Given the constrained geography of the City as a local government unit and the limited availability of development sites, a large proportion of the new

homes will need to be built on existing council housing land. At the same time the Council holds older stock which does not meet modern standards, particularly in relation to sustainability. and falls short of the Council's aspirations. A substantial difference is emerging between the new housing supply being delivered and the older stock.

- 3.2.1. The Council is actively working on a programme of retrofitting improvements. This will be a solution in some cases but in others remodelling estates to provide additional high-quality homes is a better response. A primary target of the programme is to manage ongoing maintenance expenditure, especially urgent interventions, against the limited remaining life of housing blocks and to identify the most suitable regeneration route per estate.

4. Refurbishment Options

- 4.1. In the case of both Kingsway and Hanover & Princess Courts the buildings are obsolete in many ways. Detailed surveys have revealed significant failings in relation to the physical structure, fire protection, presence of asbestos and potential for structural collapse in the event of explosion. Proposals are being developed to address the structural issues that have been identified. Urgent action has been taken in relation to the last point to address the presence of gas supplies in the buildings.
- 4.2. While retrofitting and remodelling might be possible for multi storey blocks such as these if they were constructed using a steel or concrete frame, the advice of external experts confirms that the design of these blocks without a frame and with low ceiling heights militates against this. In terms of sustainability the Council commissioned a report from Fielden and Mawson which was based on typologies. The report did not consider Hanover and Princess Courts or Kingsway which have a design that is unlike any other Council estate.
- 4.3. While there has been a programme of ongoing investment, (particularly at Hanover and Princess Courts, where structural failings were identified as far back as 2010) the limitations of the design and original construction mean that it will be impossible to match the standard of new homes in the city without full redevelopment. Assessment of the refurbishment option involves consideration of the standards that could be achieved and the life of the building that would result.

5. Redevelopment options

- 5.1. In accordance with the policy to establish the redevelopment potential of older stock and sites owned by the Council, architects have been commissioned to undertake initial capacity studies.
- 5.2. Initial pre-application discussions with the Local Planning Authority have been held and some early surveys carried out. The sites present different opportunities and constraints in relation to neighbouring buildings, trees and open space. Preliminary studies have produced options which do provide a significant increase in the number of dwellings although falling short of the doubling of the number of units which has been achieved on other sites in the current development programme. Specific redevelopment proposals have not been subject to public consultation at this stage.
- 5.3. The Council has a commitment to the provision of affordable housing with Council rented housing being the priority. It also has a commitment to building to a Passivhaus/net zero carbon level and to new buildings being at least zero-carbon ready. A redevelopment scheme would be mixed tenure. There are options between open market sale and Council rented housing which an options appraisal would need to explore.

6. Decant

- 6.1. Redevelopment will require decant. An extensive programme of refurbishment works is also likely to require decant. Limited works programmes could potentially be carried out with residents *in situ* but this would raise issues of disruption for residents, safety, timescales and scope.
- 6.2. The Council adopted a revised policy at the HSC in September 2021 based on the Gunning Principles. The policy sets a clear framework for priority for letting to tenants required to decant, the right of return and compensation.
- 6.3. The Council has a considerable amount of stock in the north of the city but very limited housing stock close to the city centre. There could be a short window of opportunity to decant residents into homes currently being constructed by the Cambridge Investment Partnership on two sites off Mill Road and Cromwell Road.

The forecast delivery of the sites is as below:

	Q4-21/2	Q1-22/3	Q2-22/3	Q3-22/3	Q4-22/23
Mill Road	15	30	53	0	0
Cromwell Road	26	36	23	0	29

6.4. Mill Road site is forecast to deliver some 98 Council rented homes between February 2022 and October 2022. Cromwell Road is forecast to deliver 114 Council rented homes between February 2022 and February 2023.

6.5. This is not only an opportunity to offer new homes close to the city centre, but it also may enable tenants who value their community connections to move together. 75% of tenants at Hanover and Princess Courts have lived in their homes for over 10 years. Feedback from both the surveys and the outdoor event suggest that informal support networks are strong and valued by those with additional needs.

6.6. Approximately 13 families are resident at Hanover and Princess Court. Mill Road is within the same secondary school catchment area and a reasonable walking distance (15 minutes) for residents with children attending St Paul's C of E Primary School. This offers a minimal change to daily routines and does not impact existing opportunities in the transition from primary to secondary school.

6.7. The Council has a considerable amount of stock in the north of the city to create options for Council tenants to move but very limited housing stock close to the city centre. There is a unique opportunity for Council tenants at Hanover and Princess Courts to move to homes currently being constructed by the Cambridge Investment Partnership on two sites off Mill Road and Cromwell Road. 212 homes will be available in the course of 2022 and early 2023. Half of the homes will be handed over in the first six months of 2022 and most of the rest by the autumn.

6.8. If this unique opportunity is to be taken it is necessary to facilitate the offer to move immediately. Residents will be advised that a final decision on regeneration has not been taken; moves will not be made other than by agreement of residents prior to a decision. The recommendations include specific provisions to enable this approach.

- 6.9. It should also be noted that some survey respondents expressed a preference for an early decision and would prefer to move earlier.
- 6.10. Tenants decanting would retain a right to return even if decanted early. However, both leaseholders and tenants would need to understand that the completion of the decision-making process may result in the existing estate being retained.
- 6.11. This approach will require approval to commence a formal 12 week consultation process for Hanover and Princess Court residents. It will also require approval to deviate from the Lettings Policy position that those decanting are given emergency housing status at when the vacant possession date is within 12 months as outlined in the report. (Lettings Policy 5.17.4) and delegated authority to the Head of Housing to amend the Local Lettings Plans for the Mill Road and Cromwell Road developments to allow for direct lets for residents interested in moving from Hanover and Princess Court. The policy approved in September 2021 also identifies the Council's approach to leaseholders, including the compensation they are entitled to. Redevelopment is likely to include a range of tenures and the right of return could possibly be an option. Affordability will be an issue for many leaseholders and for some equity sharing may be considered. This will require approval to purchase the leasehold interest of flats in Hanover and Princess Courts and to issue Home Loss, Disturbance Payments and Basic Loss payments at risk to leaseholders affected by the potential redevelopment.
- 6.12. This approach carries some risks. These are considered below.
- Some residents will move when no redevelopment takes place. This risk can be mitigated by ensuring that none are moved against their will prior to a decision and that residents who move are fully aware of the possibility that the buildings will be retained.
 - There may be a perception that this is prejudging the issue but a higher levels of vacancy would enable a refurbishment programme to proceed much more easily and fully if that were the preferred option. This would also address the position of those survey respondents who wanted certainty and to move early.
 - Voids would be created which would need to be properly secured or managed as temporary accommodation. There will be a rent loss to the Council and costs incurred through Home Loss, Basic Loss and Disturbance Payments. This loss has to be set against the benefits of securing greater control over the building whichever option is pursued.

- The longer-term options appraisal and management plan for Kingsway will need to take account of the issues identified in that estate including fire safety considerations and this could require more extensive action than currently proposed. This risk can be mitigated by careful management of the issues that have been identified.

6.13. As noted above the Council adopted a revised policy at the HSC in September 2021. Experience on other estates has indicated a need for a revision to the section 5.17 of Cambridge City Council's Lettings Policy to clarify the position on 'like for like' offers of accommodation. An additional clause has been inserted into the section of the policy which deals with households whose homes are due to be demolished under one of the Council's redevelopment schemes. This newly proposed clause is detailed in italics at 5.17.4 at Appendix C.

7. Hanover & Princess Courts



7.1. Hanover and Princess Courts are located just off Hills Road, within a mile of the city centre, and comprise two apartment blocks constructed in 1968. There is also an interconnected block of garages and the three buildings partially enclose a courtyard. The number of homes and garages and the current tenure breakdown are shown in the tables below.

Hanover Court	Homes
Rent	51
Leasehold	27
Total	78

Princess Court	Homes
Rent	31
Leasehold	16
Temporary Accommodation (following buyback)	2
Total	49

Hanover & Princess Courts	Garages
Void	17
Council tenant	12
Private external	68
Commuter/business	29
Total	126

7.2. Problems with the structure at Hanover and Princess were identified well over 10 years ago and there has been an ongoing programme of works to address some of them, alongside routine planned maintenance. The tables at Appendix B show that £2.5m has been invested in Hanover and Princess Courts over a ten year period.

7.3. A report from Structural Engineers MLTS Limited dated 28th February 2020 commented

“The buildings built in 1968 are moving towards the end of their design life whatever that was originally. Arguably the buildings had design issues and construction issues compared to modern standards and will need a large financial investment to bring them up to standard or simply to slow the deterioration of the buildings by cycles of annual monitoring and

maintenance..... A cost benefit analysis should be undertaken on the buildings bearing in mind their age and year of construction”

7.4. Further work has been carried out since this report to identify repairs to structural defects.

7.5. In January 2021, Housing Scrutiny Committee approved a further programme of works (referred to as Phase 3) at Hanover and Princess Courts:

- Masonry repairs
- Completion of concrete repairs to balcony beams
- Replacement of metal screens to balconies
- Re-routing of downpipes and alterations to drainage
- Upgrade of handrails and roof protection
- Safety upgrades to communal staircases and landing balustrades
- Drainage repairs
- Minor roofing works and bin chute alterations

7.6. The masonry and concrete repairs are additional to the repairs which were started in 2018/19. The Structural Engineers, Millwards have said:

“Following the proposed remedial works identified on Millwards spreadsheets, drawings, and photographic records all of the known defects to the buildings will have been addressed and the building can continue to provide accommodation for the residents for many years subject to the usual inspections and maintenance that would be expected of any property.”

7.7. Approval was also given for the following works, subject to further investigation:

- Fire compartment improvements between flats and service risers
- Landlord electrical supply replacement

7.8. Since that time further surveys and preparatory work to develop specifications has been carried out. S20 letters were issued to leaseholders on 5th October 2021 notifying them of the proposed works. It should be noted that leaseholders only have to contribute to repairs, not to improvements; that even where there is a clear legal liability collection of monies owed can encounter difficulties and that the co-operation of all leaseholders in achieving access to their dwellings is required.

7.9. In January 2021 the HSC was advised of the following cost estimates for this phase of the works:

	Estimated cost of work	Fees	Contingency	Total
Hanover Court 1-78	£810,000	£160,000	£80,000	£1,050,000
Princess Court 1-49	£550,000	£110,000	£50,000	£710,000
	£1,360,000	£270,000	£130,000	£1,760,000

7.10. Indications from the consultants are that costs are likely to be somewhat higher than this. These are estimates as the works have not been tendered at this stage.

7.11. Some urgent work had to be carried out. Notably the risk associated with gas supplies in the buildings was identified as part of the ongoing investigations and an urgent programme to manage the risk and remove gas from the premises was put in hand.

7.12. An inevitable challenge as buildings age and move towards the end of their design life is to balance continued expenditure on maintenance to maintain quality and safety against the limited life of the buildings and the potential for redevelopment. The buildings at Hanover and Princess Courts have required a high level of expenditure and substantial further expenditure will be required. A key element is the cumulative nature of the issues: structure, fire safety, sustainability etc. All of these need to be assessed individually but an overall approach needs to be considered.

7.13. One reason that redevelopment is a real and strong option is that the limitations of the structure will prevent significant amendments to unit layouts, as most vertical walls will be structural. At around 2.5m the current floor to ceiling heights are well below the current standard of 3m and there is physically no room for additional thermal or sound insulation.

7.14. The assessment needs to be considered in the light of the issues of standards and sustainability noted above.

8. Kingsway



8.1. Construction of Kingsway flats was completed in 1966. The estate is comprised of connected blocks of 4 and 5 storeys plus a small number of garages. The tables below show the number of homes and garages, plus a breakdown of tenure:

Kingsway	Homes
Rent (inc 8 voids)	100
Leasehold (inc 1 pending RTB)	30
Total	130

Kingsway	Garages
Council tenant	31
Private resident	24
Void	15
Total	70

8.2. Repairs to date have been mainly confined to routine planned maintenance and a total of £2m has been expended on the estate in the last five years.

8.3. A fire at one of the Kingsway flats in May 2020 resulted in damage to 8 flats and a detailed inspection of the remaining fire risks. Fire risk assessments revealed the need for an extensive programme of works to

improve protection. An important requirement is to consider means of escape to parts of the building which currently have a single access. A trial of two different approaches is taking place to establish the best solution and the estimated cost of fire stopping work at Kingsway

8.4. Additional risks associated with unknown levels of asbestos, defective landlord's electricity supplies and the potentially severe repercussions in the event of a gas explosion also came to light as at Hanover and Princess Courts. There has been no detailed analysis as yet of the Kingsway blocks' structure. Work to improve external wall insulation is currently being undertaken.

9. Consultation

9.1. In November 2021 outdoor consultation events were held at Hanover and Princess Courts and Kingsway. There was a good level of response to the survey at Hanover and Princess Courts (39 responses) but less so from Kingsway (14 responses).

9.2. There was an element of uncertainty about whether regeneration meant redevelopment and new build) or refurbishment (remodelling and improving the existing buildings). Analysing responses beyond the headline question in the survey half of the respondents at Hanover and Princess Courts favoured redevelopment but a significant minority wanted to see refurbishment – a smaller group being unsure or wanting a maintenance only approach. The much smaller set of responses at Kingsway favoured redevelopment.

9.3. The consultation exercises are described together with the results of the surveys carried out at Appendix B.

9.4. Council officers are continuing to engage with residents through e-mail, letters, phone-calls. Face to face contacts are currently restricted.

10. Options:

A. Discontinue options appraisals and carry out ongoing repairs

This would still require significant works over an extended period to address structural issues, fire safety issues and sustainability. This is in addition to the regular decent homes maintenance programme. While a very small number of

residents favoured this option at Hanover and Princess courts the great majority did not and none did at Kingsway.

B. Carry out options appraisals now and progress schemes at both Hanover and Princess Courts and Kingsway

This has been ruled out due to funding and decant constraints.

C. Carry out an options appraisal at Hanover and Princess Courts considering full scale refurbishment and redevelopment and develop a longer-term programme for Kingsway

C(1) With immediate decant

This has the benefit of taking advantage of the decant opportunity at Mill Road and Cromwell Road which will be significant for tenants at Hanover and Princess Courts and of limiting works that will otherwise be required in the near future.

C(2) Without immediate decant

This would lose much of the benefit of the Mill Road and Cromwell Road decant opportunity. It would avoid early moves and the rent loss and costs identified above. If this opportunity were not to be taken up the case for focussing on Kingsway first would have to be reconsidered.

D. Carry out refurbishment as far as possible without requiring decant

This option could be considered within an options appraisal which considered refurbishment and redevelopment options which do require decanting

E. Carry out the options appraisal at Kingsway and develop a longer-term programme for Hanover and Princess Courts

There is a case for focussing on Kingsway to address the issues identified there. It is not as strong as the case for focussing on Hanover and Princess Courts given the historic and planned expenditure but the availability of decant for Hanover and Princess Courts is important. This should be reconsidered if the decant of Hanover and Princess Courts is delayed.

11. Finance

11.1. In line with the review of options and the resident consultation process a number of adjustments need to be made to the HRA business plan.

11.1.1. The assumptions for the delivery of the 1,000 homes programme included sufficient funding to buy back leasehold dwellings and re-locate all tenants in both Princess Court and Hanover Court. This funding could be required over a two-year period, 2022/23 and 2023/24.

11.1.2. As part of the HRA Medium Term Financial Strategy, £5,000,000 was ear-marked in 2022/23 to undertake fire compartmentalisation, and other fire safety works to these large flat blocks, should the works be required. On the basis that the potential redevelopment of Princess and Hanover Court moves forward but Kingsway is retained for the medium term £1,200,000 will be required in 2022/23 to undertake the required fire compartmentalisation works at Kingsway, with £650,000 re-phased into 2025/26 for further fire safety works there if required. The balance of funding has been removed from the programme at this stage.

11.1.3. If due to the consultation process or for some other reason the prioritisation is reversed the funding pots would be reviewed.

12. Other Implications

(a) Staffing Implications

Development work continues to be managed by the Housing Development Agency, which will also provide the Council's staffing contribution to the development of specific schemes.

Given the scale of redevelopment and associated rehousing need which would accompany the regeneration of these estates it is proposed that the HDA increase staffing capacity to ensure successful management of this undertaking. Provision has been made in the budget forecast proposed in the Budget Setting Report.

(b) Equality and Poverty Implications

Scheme specific EQIAs accompany specific schemes as they progress to Committee for approval. Such scheme specific EQIA's will accompany further reporting to this committee as firm scheme proposals come forward for decision.

(c) Net Zero Carbon, Climate Change and Environmental Implications

The high level work carried out by Fielden and Mawson is noted in the body of the report. Net zero carbon, climate change and environmental implications will be a significant element in the assessment of options.

Work toward designing new development schemes for these estates will be conducted in line with the Sustainable Housing Design Guide (SHDG).

Council Climate Change Rating assessments will be completed for all schemes coming forward to this committee for approval.

(d) Procurement Implications

A Housing Scrutiny Committee in January 2021 set out the proposed approach to delivery of the new housing programme and identified the Cambridge Investment Partnership (CIP) as the primary delivery route.

It is envisioned that any proposed schemes at Hanover Court, Princess Court and Kingsway will be delivered by the CIP, subject to an independent Value for Money assessment by the Employers Agent on the Council's behalf. The Council is working through CIP to develop redevelopment options and to contribute to the consideration of the range of options under review. Consultants required outside the CIP process will be procured in accordance with Council policy as required. Specific procurement considerations related to any proposed development will be included in scheme-specific reporting as these progress for Committee Approval.

(e) Community Safety Implications

All schemes under the new housing programme will be built in accordance to Secure by Design guidelines as set out within the City Councils Design Brief.

In line with the proposed regeneration approach, activities are aimed toward updating council stock to meet such Secure by Design Guidelines.

13. Background Papers

19/42/HSC Approval for CIP scheme delivery routes

21/9/HSC Cambridgeshire Home Improvement Agency – Works Contract procurement

21/48/HSC Report on progress toward HRA Estate Regeneration programme including a report on a proposed scheme at Aylesborough Close

14. Appendices

Appendix A: Expenditure on Hanover and Princess Courts 2011/12

Appendix B: Consultation events November 2021

Appendix C: Proposed Lettings Policy amendment

15. Inspection of papers

To inspect the background papers or if you have a query on the report please contact Claire Flowers, Housing Development Agency,

Tel: 01223 - 457928 email: claire.flowers@cambridge.gov.uk

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Appendix A: Expenditure on Hanover and Princess Courts 2011/12

Hanover Court	Work Year	Invoiced Cost
Emergency lighting & PTR / Concrete Repairs	2011/12	£35,634.45
Asbestos Removal	2013/14	£3,446. .50
Balcony Refurbs	2012/13	£120,285.53
Communal Flooring	2015/16	£58,515.61
Lift Refurbishment	2015/16	£48,160.14
Re-Roofing /Insulation / Edge protection / Roof Hatches/ Structural Brickwork repairs	2016/17	£434,932.55
Front Doors	2016/17	£11,996.00
Concrete Repairs	2018/19	£200,986.00
Helifix brickwork repairs	2018/19	£205,334.57
Walkway drain surveys/repairs	2018/19	£5,800.00
Replace fire doors	2020/21	£90,000.00
Total		£1,215,091.35

Princess Court	Work Year	Invoiced Cost
Emergency lighting & PTR / Concrete Repairs	2011/12	£35,634.45
Re-roofing / Insulation / Edge Protection (HHSRS)	2011/12	£300,000.00
Balcony Refurbs	2012/13	£335,219.17
Asbestos Removal	2013/14	£3,446.50
Communal Flooring	2015/16	£29,257.81
Lift Refurbishment	2015/16	£46,121.29
Structural Brickwork repairs	2016/17	£163,461.64
Front Doors	2016/17	£597.00
Emergency Escape / Access Hatches to roof	2017/18	£48,068.93
Concrete Repairs	2018/19	£108,869.53
Helifix brickwork repairs	2018/19	£103,329.61
Walkway drain surveys/repairs	2018/19	£7,446.00
Replace Fire Doors	2020/21	£50,000.00
Total		£1,231,451.93

Approx. £475,000 was expended during the period on works to community facilities and repairs to the garages.

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Appendix B – Consultation events November 2021

1. Introduction

- 1.1. The units comprising each estate are currently home to established communities. The proportion of leaseholders is currently just under a quarter of the total of 130 homes at Kingsway and around a third of the total of 127 homes at Hanover and Princess Courts. A substantial proportion of the homes sold under the Right to Buy have now been let out.
- 1.2. Any comprehensive strategy for remodelling or redevelopment will impact all these interest groups acutely but in different ways. Proposals must be tested thoroughly through patient and detailed communications so that all those concerned have the opportunity to voice their opinions and influence the outcome. The Council is committed to extensive and meaningful consultation at an early stage. This means that there will be an element of uncertainty about viability, funding and timing.

2. Consultation events November 2021

- 2.1. Residents of both estates were informed by letter that the Housing Scrutiny Committee would consider a report at its meeting on 23rd September 2021 which describes how the Council will work through the options for investment.
- 2.2. In November 2021 a letter to all residents at Hanover Court, Princess Court and Kingsway invited residents to two outdoor consultation events:
 - Hanover and Princess Court – 13th November
 - Kingsway – 20th November
- 2.3. The letter provided a named contact for any enquiries or questions leading up to each event.
- 2.4. In addition, the events were promoted by a flyer sent to each household and posters displayed in communal areas within each estate. The flyers also listed the details (with QR code for easy access) of two websites where further information could be gained of the consultation process:
 - www.hanoverandprincess.co.uk
 - www.kingswayflats.co.uk

2.5. Invitations were also sent to Members with advanced copy of the content to be displayed at each event.

Attendance

2.6. Between 8-10 Council Officers were present at each outdoor event from Housing, Repairs and Maintenance, Leasehold Services and the Housing Development Agency, alongside Members from both Market and Arbury Wards.

2.7. Boards were displayed to provide detail in the following areas:

- Strategic overview of the Council's housing aspirations
- Redevelopment – opportunities and constraints
- Examples of recent Council developments
- Decant options and support available
- Survey and different ways to provide feedback

2.8. Officers were present from a range of services to discuss the condition of the estates and issues surrounding redevelopment or refurbishment.

2.9. Door to door calls were made to households at both estates to advise that we were on site and to leave a survey.

Online

2.10. Two webinars were held for those unable to attend the outdoor events;

- Kingsway – 23rd November
- Hanover and Princess Courts – 25th November

2.11. A letter was sent to all residents to notify of each webinar. The webinar events were also detailed within each consultation website.

2.12. Unfortunately, the first webinar (Kingsway) could not proceed due to technical difficulties. Three residents were registered to attend and these have been contacted separately by phone to arrange further discussion.

2.13. A recording of the webinar for Hanover and Princess Court has been made available on the consultation website for residents to access.

Feedback on the events

2.14. Feedback on the events was mostly positive – for example:

“Congratulations for your clarity in order to communicate your ideas making this event happen today.”

“Thank you for today, it’s been very positive and encouraging.”

“I think it’s great the level of interactivity you have shown in consultation with tenants, regarding future plans/ideas on their homes.”

2.15. One respondent thought the material on the day was biased because it was too focussed on redevelopment.

2.16. The responses to the consultation survey are considered below under each of the estates.

3. Consultation Survey Hanover and Princess Court

- 39 Survey responses received
- 13 Webinar attendees
- 78 Website views
- 53 Drop-in attendees

3.1. Residents were asked about what they liked about where they lived. Several responses focussed on the location:

- *The central location (multiple responses)*
- *Close to transport links and hubs e.g., a short walk to the train station and on main bus route to Addenbrooke’s hospital*
- *Easy access to city centre for work opportunities*
- *Close to shops and GP surgery*
- *Outstanding schools in catchment area*

3.2. Other positive comments focussed on management issues:

- *Pet-friendly place*
- *Low rent*

- *Secure tenancy*
- *Excellent caretaker*

3.3. Other comments focussed on the environment and the community:

- *The community room and gardens*
- *Pleasant space – I've invested a lot of money in my flat*
- *Strong community spirit*
- *Access to the garage*
- *The communal corridors in the flats are open air – of huge benefit during the Covid pandemic. There is a feeling of space which is absent from some newly built properties or those with indoor hallways.*

3.4. Residents were asked about what they disliked about where they lived. Many of the comments focussed on energy and sustainability issues:

- *Heating system which is not fit for purpose.*
- *I pay a lot of money for electricity and yet still feel cold in the winter.*
- *Expensive storage heaters which do not work properly, despite the council repeatedly trying to resolve the issue.*
- *Hot water tank that is far too large for one person and is expensive to run. Also takes up valuable storage space.*
- *Lack of ventilation as windows only open on one side of the flat, therefore there is no through breeze. There needs to be some form of air-cooling system.*
- *Noise disturbance from people walking along the communal walkways.*
- *Poorly insulated doors that make the flat colder and more expensive to heat.*
- *Flats are very cold and damp*

3.5. Other negative comments could be read as comments on management issues but also reflect the constraints and challenges of maintaining and managing the existing buildings

- *Obvious drug-use from the smells that come in from outside.*
- *Anti-social behaviour and crime, particularly feeling scared when it's dark and poor external lighting (mostly out of order)*

- *The ease with which non-residents can access the property*
- *Lack of communal cleaning*
- *No motor bike parking available*
- *Poor management of repairs.*
- *Excessive and unjustified council charges to carry out repairs*
- *Exterior design – brutalist architecture made worse by tired stairways and brickwork*

3.6. Within the survey, 36 of the 39 respondents answered the question ‘Do you agree that Hanover and Princess Court is in need of regeneration’?

Strongly agree	Agree	Neutral	Unsure	Disagree	Strongly disagree
16	8	3	1	2	6

3.7. Overall the breakdown of these responses is as follows:

- 67% either strongly agreed or agreed
- 8% were neutral or unsure
- 22% either strongly disagreed or disagreed
- 3% were unsure

3.8. The proportion of council tenants responding was slightly higher than the proportion in the block; the proportion of leaseholder slightly lower. Support for regeneration was about the same amongst residents whether leaseholders or tenants (at about two thirds). Non-resident landlords were more opposed.

3.9. It is clear from other comments that most respondents understood regeneration to mean redevelopment but four of the eight who responded agree indicate that they would prefer regeneration to mean refurbishment. There is support for refurbishment from those who responded that they disagreed with regeneration. Overall, this survey suggests greater support for redevelopment but a significant minority that would prefer refurbishment. Only limited information has been provided to date to residents about the issues surrounding refurbishment and redevelopment identified in this report.

3.10. Asked what people would like to see many comments reinforced the basic agree/disagree message. Other comments from those favouring redevelopment included

- *I would like to see regeneration of the area with modern design. As discussed in a recent meeting with residents.*
- *Affordable environmentally-conscious flats*
- *Regenerate but let me come back*
- *After a lot of consideration, I feel that relocating for the purpose of demolition and then returning to Hanover Court once re-built; in the long term this will save us all money.*
- *Properties that offer safe, affordable and economically and environmentally sound*
- *The proposed plan will be highly disruptive especially as there are so many elderly and disabled residents and residents with mental health issues..... I moved into this flat believing that I would be here until I died....The survey is highly biased.....the only option discussed is that of redevelopment.*

3.11. Other comments from those indicating opposition to redevelopment included

- *I would like the buildings to be sensitively restored in a way that respects the integrity of the building work which is architecturally thoughtful and better quality than a lot of new builds. I would be disappointed if more housing was crammed in, which would make it inhospitable for families. Trees need to be preserved, and parking, so that it is liveable for people.*
- *Knock the garages down but keep the flats and get the work done.*
- *I would like to remain here. I would like the council to make some improvements but keep the courts.*
- *For the council to consult tenants about changes and modifications to their flats and also to check and take responsibility over contractors to make sure that a) the changes are necessary b) what is being put in place is appropriate c) that new installations are made and work correctly.*
- *It seems crazy the council having recently invested and spent money..... We as residents have suffered enough disruption and inconvenience by the council constantly undertaking unnecessary works requiring access to our flats and now the possible disruption after all that of having to find alternative suitable accommodation!*

- *Insulating flats so they would be warmer during winter*
- *It is extremely unsettling to not know where we will be moved if decision is taken to demolish the flats. We have already been homeless in the past and it had serious health consequences on us*

3.12. Other comments from those who were unsure or neutral included

- *I would like to see the continuing existence of quality council housing in the centre of the city, whether that's by extensive refurbishment that addresses existing building and safety issues of the Courts or redevelops the site for future sustainable homes. I want to see the rationale for both options.*

3.13. Residents indicated that they wish to remain involved in the process, with 80% requesting updates by email or newsletter and 20% indicating they would like to be part of a steering group.

4. Consultation Survey Kingsway

- 14 Survey responses received
- 3 Webinar registrations
- 103 Website views
- 31 Drop-in attendees

4.1. Residents were asked about what they liked about where they lived. Some responses focussed on the location:

- *Good bus links and close to shops (Arbury Court is nearby).*
- *Close to the local school.*
- *Perfect location meaning that it is easy to walk everywhere.*

4.2. Some focussed on amenities

- *Balcony with good storage space outside.*
- *Good TV aerial and broadband connection.*
- *The property is warm, spacious and well looked-after (the caretaker is good).*
- *The size of the flat is good, with generously sized rooms. There are open green spaces, the council maintenance is good and there is new insulation.*

- *Lockable sheds are great for secure bike storage.*
- *Individual stairwells work really well as it is nice to have a proper front door and your own entrance – it doesn't feel like living in a block of flats.*

4.3. A couple of comments focussed on cost related issues

- *Affordable.*
- *The council is a transparent and fair freeholder.*

4.4. Others focussed on community

- *Friendly and helpful neighbours.*
- *Close to family and friends.*
- *Strong sense of community – people know each other here. It is real life, not all middle-class people.*

4.5. Residents were asked about what they disliked about where they lived. Many of the comments focussed on anti-social behaviour issues:

- *The area around Kingsway is well-known for drug use. People deal drugs and take drugs in communal areas (stated in multiple responses).*
- *Security problems, particularly when the scaffolding went up. Grown men and teenagers climbing the scaffolding inches away from tenants' windows. Broken fencing and a lack of CCTV.*
- *Exterior lighting that doesn't work. Unsafe at night.*
- *Poor environment. People dump rubbish by the carload, creating a fire hazard (the caretaker is fantastic in clearing this really quickly) and there is a smell of urine in the lift and on the stairs.*
- *Very noisy with young people gathering in communal areas, smoking cannabis.*

4.6. Other comments focussed on building quality issues

- *The building offers very, very poor living quality and is outdated for Cambridge.*
- *The design of the building – paper thin walls. Noise outside at night is deafening because of people walking on all the hard surfaces.*
- *Lack of parking spaces.*

- *Old water and heating system. It is so cold. Huge loss of heat in 1st floor flats through the floors. I can't afford to heat my bedroom anymore.*
- *There is bad access to ground floor, especially for a fire exit. Not safe to live in.*
- *A lack of natural light in the property. Recessed balconies mean that we don't get any sun.*

4.7. Within the survey, 13 of the 14 respondents answered the question 'Do you agree that Kingsway is in need of regeneration'?

Strongly agree	Agree	Neutral	Unsure	Disagree	Strongly disagree	No response
9	2	1	1	0	0	1

4.8. Overall the breakdown of these responses is as follows:

- 85% either strongly agreed or agreed
- 8% were neutral
- 8% were unsure
- No respondents either strongly disagreed or disagreed

4.9. The proportion of council tenants and leaseholders responding broadly matched the proportion in the estate of leaseholder slightly lower. However, it should be noted that the response rate was very low. A resident who did not respond to the survey has indicated that they are settled and do not wish to move.

4.10. Asked what people would like to see many comments reinforced the basic support for redevelopment and the concerns about anti-social behaviour noted above.

4.11. Those focussed on regeneration included:

- *We would like the existing flats to be knocked down and rebuilt. We would like to return to Kingsway and for the new development to have green spaces for children and for anti-social behaviour to be dealt with.*

- *I think that us as council tenants we should embrace the possibility of total redevelopment, while also giving thought to our surrounding leaseholders. Redevelopment could mean that anti-social behaviour would reduce, making Arbury in general on a par with some more affluent areas. It would be a place for growth in terms of quality of life.*
- *I would like Kingsway to still be a place where I could afford to live. If the demolition goes ahead, the new build should be built to last so that we're not in the same situation again in years to come.*
- *Redevelopment is the best option given the age of the building. The land isn't used very well and there are too many garages. I don't see why there is a long consultation time. The sooner it's redeveloped the better*

4.12. Concerns focussed on anti-social behaviour and community issues were reflected in these comments:

- *A security presence to stop homeless people sleeping in the stairwells.*
- *I would like it to be drugs-free and for lights to be outside*
- *There could be improvements to the sense of community, perhaps some communal activities would help. I don't even know my neighbours.*
- *There should be security improvements, such as metal fencing*
- *There should be more car parking available for residents. This would stop people parking on the grass or on nearby roads*
- *It would be great to see some benches, bicycle storage or even a community centre with a café here.*

4.13. Residents indicated that they wish to remain involved in the process, with 11 requesting updates by email or newsletter and 3 indicating they would like to be part of a steering group

Appendix C – proposed revision to section 5.17 of Cambridge City Council's Lettings Policy (revision detailed at 5.17.4 in italics)

5.17 Applicants whose homes are to be demolished under one of the Council's redevelopment schemes

5.17.1 When the Council has made a decision to demolish tenants' homes so that the site can be redeveloped the Council will aim to ensure that the tenants and their households are re-housed in line with the Council's Home Loss Policy.

5.17.2 The Council will tell tenants the date when their home has to be empty. This is called the vacant possession date.

5.17.3 The Council will talk to the tenant about all the re-housing options that are available. Some schemes may involve new homes being built. The Council will try to help the tenant to make an informed decision about the best choices for them. The tenants will be asked to fill in an application to go on the housing register (see chapter 2 of this policy). Tenants 34 required to move will be given priority to return to suitable alternative accommodation on the redeveloped or refurbished scheme provided that there is sufficient new accommodation of the type required available.

5.17.4 Tenants affected will have the right to move to a 'like for like' Council dwelling for the initial decant move unless they are under occupying the property (as defined elsewhere in this policy) by more than one bedroom, in which case, under occupation by one bedroom will be allowed (e.g. a single person in a 3 bedroom property would not be able to move to another 3 bedroom property but could move to a 2 bed) . Should the tenant later wish to return to the redeveloped or refurbished scheme the Council will use its reasonable endeavours to ensure a 'like for like' move from the decanted property within the confines described in 5.17.3 above provided there is sufficient new accommodation of the type required available. 'Like for like' should be taken to mean size in terms of bedrooms and size in respect of property type e.g. house or bungalow, maisonette or flat and that the landlord is Cambridge City Council. An under occupying tenant may also opt to downsize by accepting an offer from any landlord in the Home-Link partnership.

5.17.5 Tenants whose homes are to be demolished will be given "emergency housing status" when the vacant possession date is one year or less away

5.17.6 Where more than one tenant with emergency housing status has bid for a property priority for shortlisting will be given to the tenant with an earlier priority date.

5.17.7 Where more than one tenant with emergency housing status and the same priority date has bid for a property a Cambridge City Council housing adviser will decide priority for shortlisting taking into account the needs of the applicants and the best use of housing stock

5.17.8 Tenants with emergency housing status can continue to bid for any homes that interest them up to six months before the site vacant possession date

5.17.9 If a tenant has not moved six months before the vacant possession date the Council may take one or more of the following actions: (a) Make an offer of the next property that the Council reasonably considers is suitable to meet the minimum housing needs of the tenant; (b) Serve a formal notice (a Notice Seeking Possession) that allows the Council to ask the County Court for an order requiring the tenant to leave their home. The Council must satisfy the Court that suitable alternative accommodation is available or the tenant to move into. 28 (C) Refer the case to the Senior Officer Review Panel (SORP) where suitable alternative accommodation has not been available for the tenant to move into or other, extenuating circumstances explain why the tenant has not been able to move. SORP can chose to extend the bidding period, seek a direct let from a registered provider partner within the Home-link partnership or take another course of action aimed at resolving the tenant's housing situation Serving a Notice Seeking Possession is always a last resort, where the tenant has not accepted any of the other housing options available to them. The Council has to do this to ensure that the redevelopment scheme can proceed.

5.17.10 If a tenant with emergency housing status whose home is being demolished under a redevelopment scheme is successful in bidding for an advertised property and the Council considers that the property is suitable for them the Council will expect them to move into the property. If the tenant does not move and a Notice Seeking Possession has been served, the Council will either hold the property or make an offer of the next property that the Council considers reasonable to meet the minimum needs of the tenant's household. If the tenant still does not move the Council may ask the Court for an order requiring them to move.



Item

Combined Update on new build council housing delivery

To:

Councillor Mike Todd-Jones, Executive Councillor for Housing

Housing Scrutiny Committee 20/01/2022

Report by:

Claire Flowers, Head of Housing Development Agency

Tel: 01223 - 457928 Email: claire.flowers@cambridge.gov.uk

Wards affected:

All

1. Executive Summary

- 1.1 This report provides an update on the housing development programme.
- 1.2 196 Homes have been completed across 13 sites under the City Council programme, with 107 being net new Council homes. An additional 16 modular “pod” homes have been completed across 3 sites.
- 1.3 The Council currently has 419 net new Council rented homes being built on site.
- 1.4 The Council has been recognised for its success through the Cambridge Investment Partnership at the Inside Housing Development Awards in November where it won the *Best Development Team (South)*.
- 1.5 159 net new affordable with a total of 45 market sale homes and an overall total of 253 homes are currently approved as a first stage of the new 1000 homes housing programme.

- 1.6** The HDA continues to hold discussions with Homes England regarding funding for the new housing programme
- 1.7** The updates to the councils Sustainable Housing Design Guide have now been completed with the guide now following the Department for Levelling Up, Housing and Communities (DLUHC, formerly the MHCLG) National Design Guide ten characteristics of a well-designed place. This design guide for council housing developments includes the sustainability targets as approved by the January 2021 meeting of this Committee on carbon, energy, water, biodiversity, car park ratios and EV charging.

This provides guidance on how sustainable design and good placemaking can help residents out of fuel and water poverty as well as ensuring affordable long term annual maintenance costs. The guide can be found in appendix 3 and will be on the council's web site.

2. Recommendations

The Executive Councillor is recommended to:

- 2.1** Note the continued progress on the delivery of the approved housing programme.
- 2.2** Note the updated 2021 Sustainable Housing Design Guide, to include the recommendations approved in January's 2021 HSC meeting and DLUHC's National Design Standards.

3. Reporting

- 3.1** This is a quarterly report showing progress on the City Councils new housing developments.

4. £70m funding programme DLUHC

- 4.1** The Council's housing programme is part funded by a £70 million grant, which to date has been paid via a combination of the Cambridgeshire & Peterborough Combined Authority and directly by DLUHC. All funding has been received.

- 4.2** As at 31 March 2021 £41,859,663.36 of the funding has been utilised in the delivery of new homes, with £28,140,336.64 held in balances to fund the completion of the programme from April 2021 onwards.

5. Delivery Programme

- 5.1** The delivery programme update provided in June 2021 confirmed that the devolution programme consisted of 542 Council Homes with a further 104 homes identified for the new programme. Following approvals received at the September 2021 meeting of this committee the forecast home delivery under the new 1000 programme has been revised to 159 net affordable homes.
- 5.2** The Council has been recognised for its success through the Cambridge Investment Partnership at the Inside Housing Development Awards in November where it won the *Best Development Team (South)*.
- 5.3** Appendix 1 shows the current programme, indicating total housing provided as well as the net gain of Council homes. Appendix 2 shows the approved budgets per scheme and the net cost to the Council's Housing Revenue account.

6. Profile of Start on Sites

- 6.1** The start on site profile for the 500 devolution programme is shown in table 1. The total starts on site currently stand at 526, or 105.2% of the total programme target of 500 homes, ahead of the targeted deadline of 31 March 2022.
- 6.2** As below, the 500 programme currently shows an outturn of 540 new homes commencing construction by March 2022 with six further homes to be delivered as part of this programme but without devolution grant funding as start of site will be delayed until after this date
- 6.3** The new 1000 homes programme is additionally progressing, and 159 net new council homes have been approved by the Executive Councillor.

Table 1: Start on Site Forecast Profiles

500 Programme

Progress to 500 starts on site	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Starts by year	2	159	162	203	14	2
Cumulative total	2	161	323	526	540	542

1000 Programme

Progress to 1000 starts on site	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Starts by year	0	10	80	69	0	0	0	0	0
Cumulative total	0	10	90	159	159	159	159	159	159

7. Scheme details

7.1 Schemes Completed: Net gain 88 Affordable homes.

Scheme	Ward	Net Affordable	Total Homes	Delivery	Completion Date
Uphall Road	Romsey	2	2	E & F	Jan-18
Nuns Way & Wiles Close	Kings Hedges	10	10	Tender	Aug-19
Ditchburn Place Community Rooms	Petersfield	2	2	Tender	Sep-19
Queens Meadow	Cherry Hinton	2	2	CIP	Jun-20
Anstey Way	Trumpington	29	56	CIP	Jun-20
Colville Garages	Cherry Hinton	3	3	CIP	Jul-20
Gunhild Way	Queen Ediths	2	2	CIP	Jul-20
Wulfstan Way	Queen Ediths	3	3	CIP	Sep-20
Markham Close	Kings Hedges	5	5	CIP	Sep-20
Ventress Close	Queen Ediths	13	15	CIP	Feb-21
Akeman Street	Arbury	12	14	CIP	May-21
Mill Rd (Partial)	Petersfield	20	54	CIP	NA
Cromwell Road (Partial)	Romsey	4	28	CIP	NA

7.2 Schemes on Site: Net gain 419 Council homes

While the programme has progressed well with disruption kept to a minimum throughout the pandemic, some revised forecasts are now being required.

Our partner Hill are reporting risk pertaining to delayed onset of Brexit, Covid and activity in the industry. This is not exclusive to Cambridge or to Hill and has been widely reported across the sector. Staffing and materials supply shortages are becoming evident, and the current operating climate with regards to both labour and materials appears to be changing day by day. Hill are ensuring all materials are placed and ordered as soon as reasonably possible and stock-piled on site.

Where this is not possible, alternative storage facilities are being sought, using existing relationships with suppliers to stockpile materials wherever possible.

With regards to labour, key packages are being procured as early as possible for example brickwork, precast floor slabs/block and beam, structural steelwork, etc. Existing supply chain relationships are being used to navigate through these changing times.

Scheme Name	Ward	Net Affordable	Market homes	Total homes	Practical Completion	Programme status
Mill Road	Petersfield	98	118	236	Sept-22	Handover profile has been revised. Delays caused by material/ labour constraints in the market. Handovers are now carried forward into 2022/23 Financial year
Kingsway	Arbury	4	0	4	TBD	This is on hold pending the wider review on this estate.
Cromwell Road	Romsey	114	173	291	Jan-23	Progressing well. First handovers took place in September 2021. Programme dates under review
Colville Phase 2	Cherry Hinton	47	0	67	Oct-22	Scheduled handover date has been updated to reflect the programme/contract dates.
Meadows and Buchan	Kings hedges	106	0	106	Aug-24	Progressing to programme currently. .

Scheme Name	Ward	Net Affordable	Market homes	Total homes	Practical Completion	Programme status
Campkin Road	Kings Hedges	50	0	75	Apr-23	Scheduled handover date has been updated to reflect the programme/contract dates.

7.3 Approved schemes; Net gain 16 new homes

Scheme Name	Ward	Net Affordable	Market homes	Total homes	Est. SOS	Programme status
Clerk Maxwell Road	Newnham	14	21	35	Jan-22	Land access issues have now been resolved and final contract agreed. This is a golden brick transaction so no start on site will be claimed for funding until this is achieved.
Tedder Way	Arbury	1	0	1	Jun-22	Redesign of this scheme as a 4-bed accessible family home. Submission of a planning application is now proposed as December 2021.
Kendal Way	East Chesterton	1	0	1	Jul-22	Redesign of this scheme as a 3-bed accessible family home continues. Resolution of Boundary dispute is in process and a renewed Planning Application is now forecast for submission by January 2022.

8 Update on the Modular Housing project

8.1 16 homes have now been completed with the most recent handover in July 2021.

- 8.2 There are opportunities to utilise other small sites in a similar way with other providers such as It Takes a City also coming forward. There are opportunities for funding to support this through the DLUHC First steps programme which we have successfully engaged with. Some non-Council own sites are being considered.

9. Work toward development of the New Council Housing Programme

9.1 Council-Approved Schemes

Scheme Name	Ward	Net Affordable	Other	Total Homes	Status
L2 Orchard Park	SCDC	30	45	75	Planning Approved. Preparatory work proceeding well ahead of a start date. and start on site is now forecast for December 2021
Colville Road Phase 3	Cherry Hinton	32	0	48	Decanting proceeding well. One tenant and one leaseholder left. Commercial leaseholders have been offered alternative accommodation.
The Mews, Histon Road	Arbury	10	0	10	On site and in contract
Fen Road	East Chesterton	12	0	12	Planning Approved received in July 2021- S106 under negotiation.
Ditton Fields	Abbey	6	0	6	Planning granted in October 2021
Aragon Close	Kings Hedges	7	0	7	Pre-planning underway, with Planning submission forecast for January 2022
Sackville Close	Kings Hedges	7	0	7	Pre-planning underway, with Planning submission forecast for January 2022
Borrowdale	Arbury	3	0	3	Resolution to grant planning approved in November 2021.
Aylesborough	Arbury	37	0	70	Pre-planning underway with planning submission forecast for March 2022
Paget road	Trumpington	15 across Paget Rd and St Thomas's Rd	0	15 across Paget Rd and St Thomas's Rd	Surveys ongoing. Planning submission forecast for May 2022

Scheme Name	Ward	Net Affordable	Other	Total Homes	Status
St Thomas road	Coleridge	As above	0	As above	Surveys ongoing. Planning submission forecast for May 2022

9.2 Opportunities for new housing sites

Development opportunities

9.2.1 An update report on the work investigating regeneration options at Hanover and Princess Courts and Kingsway Flats is submitted to this Committee meeting as Item 8 on the agenda.

9.3 New programme Funding and non HRA delivery

9.3.1 As noted in the July update to HSC members, an initial bid was made to Homes England for strategic partnership status to support the new 1000 Homes development programme. This bid has not been successful. The programme continues to be dependent upon Homes England funding. A first round of funding bids to Homes England under Continuous Market Engagement are in progress and the Committee will be updated on the outcome once received.

9.3.2 Intermediate tenures

Approval to establish a new Housing Company to be registered as a Registered provider was approved at the meeting of this Committee in September 2021.

The benefits of having a registered provider housing company would mean that the Council can deliver alternative housing products and attract grant, giving more flexibility going forward. It will mean rent to buy homes (let at 80% of market rent for up to 5 years with the ability to purchase at the end of this period) can be delivered.

Funding to set up the new registered provider was approved as part of the general fund MTFS in October 2021. The authority is now in the process of instructing legal accounting tax and governance advice in relation to the setup of the new housing company with the set-up process expected to take between 6-12 months.

10 Delivering Accessible Housing

- 10.1** Cambridge City Council is committed to providing a range of housing options for residents with limited mobility. The Council adheres to the accessibility standards laid out in the Local Plan 2018. This requires 100% of new build Council homes to be M4(2) (accessible and adaptable dwellings), and 5% of new build affordable homes to be M4(3) (wheelchair user dwellings). Some of the developments attained planning on the pre-2018 local plan but the designs were changed to ensure M4(2) was adhered to and an enhanced M4(2) was also provided.
- 10.2** There are currently 27 fully adapted wheelchair user dwellings and 5 enhanced M4(2) adapted planned in the 500 programme (see table below). This along with meeting the local plan of delivering all homes to be accessible and adaptable will mean the requirement to provide 5% wheelchair user homes will be exceeded.
- 10.3** A further 4 fully adapted units are currently identified for provision under the new programme schemes (at Colville Road Ph3 and Fen Road).

Table 2: Wheelchair user homes

	Total Council rented homes (100% M4 (2) wheelchair adaptable)	Total M4 (3) wheelchair user homes	Total Enhanced (M4(2) 1 bed)	Total 1 bed M4 (3)	Total 2 bed M4(3)	Total 3 bed M4(3)	Total 4 bed M4(3)
500 programme							
Mill Road phases 1 & 2	118	3	5	3	0		
Anstey Way	56	3		3	0		
Cromwell Road	118	6		4	2		
Colville Road Ph 2	69	4		0	4		
Campkin Road	75	4		1	3		
Meadows & Buchan	106	5		2	3		
Tedder Way	1	1					1
Kendal Way	1	1					1
1000 programme							
Colville Road Ph 3	48	2			2		

Passivhaus Package	35	2				1	1
Aylesborough	70	3		2	1		

11. Sustainability

11.1 The Council's Approved schemes have to date met or exceeded the Sustainable Housing Design Guide (part of the 2018 Cambridge Local Plan) and the draft Greater Cambridge Sustainable Design and Construction SPD. This has been reported to date in both scheme-specific and programme update reporting to the HSC.

11.2 Update on Sustainable Housing Design Guide

11.2.1 In January 2021 HSC approved to:

- Update the 2017 Sustainable Housing Design Guide (SHDG) so that all council developments will be required to where viable and feasible:
 - Target Net Zero Carbon from 2030.
 - Target Passivhaus standard from 2021.
 - Attain Sustainability targets for water, overheating, post-occupancy evaluation (POE), Electric vehicle charging, car parking and biodiversity.

The updates have now been completed with the guide now following the DLUHC National Design Guide ten characteristics of a well-designed place.

This guide provides guidance on how sustainable design and good placemaking can help residents out of fuel and water poverty as well as ensuring affordable long term annual maintenance costs. The guide can be found in appendix 3 and will be on the council's web site.

12. Risks

Risk	Likelihood	Impact	Mitigation
Cost increases on approved projects	Medium– Risk remains of increased budget requirements due to COVID-related delays/ rescheduling or Brexit-related cost increases and now supply chain cost increases	Medium - depending on the extent of the additional cost this may be managed within scheme level contingencies approved in Budget Setting Report. The council has a fixed	Cost plans are regularly reviewed and updated, and contracts are fixed price to the council. Latest budgets consistently reviewed as part of BSR. Regular updated risk management budgeting completed as part of

Risk	Likelihood	Impact	Mitigation
		price contract with the contractor minimising cost risk. The cost risk lies with CIP.	risk reviews work across the Council. Supply chain and materials concerns under close monitoring.
Securing Planning on new schemes	Low – schemes have been worked up with planners through the pre-application process and meet or exceed the Councils policies.	Medium- not securing planning would cause delays and increase costs for a revised application.	Pre-app process used effectively, and schemes aim to be policy compliant.
Sales risk – exposing Council cash flow forecast	Medium – Housing market fluctuations are beyond Council control but do occur over long periods and affect the entire economy. Current circumstances may exacerbate such fluctuations or delay buyer activities in the short-medium term.	Medium – new homes are expensive but retain considerable inherent value and have uses other than market sale.	Mill road and Cromwell Road sales have launched regular reporting through CIP processes on sales. Regular updates received in the market for sales of these sites. Currently values are being achieved in line with appraisal and sales rate in line with expectations.
Decanting residents / leaseholders	– Full decant of schemes within the 500 programme has now been reached. The decant of the further scheme at Colville Road phase 3 is on-going if this is not achieved on time there will be impact on the costs of the project	High – regeneration schemes will not be progressed if residents are not decanted.	Decant and rehousing officer regularly liaising with residents requiring decanting to ensure successful rehoming. CPO and NOSP served on remaining leaseholder and tenant at Colville 3.
Not securing necessary grant for new schemes	Medium- there is currently no funding secured for the new programme other than that committed by the Council. The business plan for the MTFS assumed grant.	High - if grant is not secured or at a lower level the business plan may need to be reviewed and the level of housing and tenure delivered may need to change.	Not securing any grant is unlikely as Homes England have a programme which has funding available. Issues in securing the level required to support the costs of developing in Cambridge are an issue. Discussions are on going with Homes England. There may be a need to review assumptions in the business plan as negotiations develop.

Risk	Likelihood	Impact	Mitigation
Labour market/materials/build prices increasing	Medium/High – situation is being proactively managed and is currently seen as a short-term risk, which must be managed, but may impact programme if not price	Medium/High – services or materials shortages may lead to delays in project delivery and an overall increase on programme cashflow. Contracts with the council are fixed price minimising cost risks which lie with CIP.	Fixed price contracts and liaising with Delivery partners ensuring all materials are placed and ordered as soon as reasonably possible and stock-piled on site or using additional storage as required. Key packages are being procured as early as possible. Existing supply chain relationships are being used to ensure service.
First Homes policy introduction from March 2022 may impact council development cashflow and rental income.	High - First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through s106 obligations.	High - The introduction of First Homes will impact scheme viability which may affect number of affordable rented homes we can deliver. This is a specific government requirement which means the council will be unable to deliver a similar tenure mix as previously as delivery of First Homes is now policy.	Review of tenure and cashflow to maximise cashflow and rental income. Likely to require more market sales to cross subsidise if no Homes England grant

13. Implications

(A) Financial Implications

The Devolution Housing Grant and Right to Buy Receipts are the main source of funding for schemes in the current 500 Programme that progress into development. However, the sources of funding for each new housing scheme are laid out when a detailed report for that scheme is brought to the HSC.

Currently the 500 Programme has a total cost to date, or approved HRA budget going forward, of £139,100,718, including some re-provision of existing dwellings

The Council's housing programme is part funded by a £70 million grant, which to date has been paid via a combination of the Cambridgeshire & Peterborough Combined Authority and DLUHC. At the time of writing this report, all of the £70 million has been received, with £38 million via the Combined Authority and £32 million directly from DLUHC.

Until the end of 2020/21 quarterly grant claims were made in arrears against the Devolution funding to the Combined Authority. As of 31 March 2021, £41,859,663.36 of the funding has been utilised in the delivery of new homes, with £28,140,336.64 held in balances to fund the completion of the programme from April 2021 onwards.

This is funded through four avenues:

- Funding provided by the Combined Authority Devolution grant
- Funding provided from Section 106 agreements
- Funding provided by Right to Buy receipts
- Funding provided direct from HRA

The general fund has also supported the delivery of the programme through its investments through the Cambridge Investment Partnership at Mill Road and Cromwell Road. The general fund has further assisted in the development of the Meadows and Buchan schemes, through enabling of land supply and reprovision of community facilities for the duration of on-site activities.

The updated assumptions for the new housing programme have been included within the January 2022 budget setting report. Dialogue is ongoing with funding agencies to enable the council to meet the proposed level of housing delivery. Failure to secure grant will significantly limit the authority's ability to deliver the number of new homes that it aspires to deliver mixed tenure schemes will have to be considered.

(B) Staffing Implications

All housing development schemes will be project managed by the Cambridge City Council Housing Development Agency in liaison with City Homes; Housing Maintenance & Assets; and the Council's

corporate support teams. A large proportion of the schemes are being delivered through the Cambridge Investment Partnership which provides additional resources.

(C) Equality and Poverty Implications

The development framework for new housing by the Council, approved at the March 2017 Housing Scrutiny Committee was informed by an EQIA. Each scheme specific approval is now informed by an EQIA as it proceeds for Committee approval.

(D) Net Zero Carbon, Climate Change and Environmental Implications

There are no environmental implications of this report. Each scheme specific approval will cover any specific implications.

(E) Procurement Implications

Advice specific to each project.

(F) Consultation and communication

The development framework for new housing by the Council approved at the March 2017 Housing Scrutiny Committee sets out the Council's commitment to involve residents in new housing schemes.

An updated Regeneration policy outlining procedure for resident engagement was approved by the September 2021 meeting of this Committee (Item 12), and guides all resident involvement exercises.

(G) Community Safety

There are no community safety implications for this report. Each scheme specific approval will cover any community safety implications.

14. Background papers

Background papers used in the preparation of this report:

- (a) 23/09/2021 HSC Combined update on new build council housing delivery

- (b) 23/09/2021 HSC Report on progress toward HRA estate regeneration programme.

15. Appendices

- (a) Appendix 1: Programme milestone summary
- (b) Appendix 2: Programme finance summary
- (c) Appendix 3: Updated Sustainable Housing Design Guide

16. Inspection of papers

To inspect the background papers or if you have a query on the report please contact Claire Flowers, Head of Housing Development Agency, tel: 01223 - 457928, email: claire.flowers@cambridge.gov.uk.

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HDA Delivery Programme		06/01/2022									
Scheme Name	Ward	Net Affordable	Market homes	Total homes	Delivery	Committee	Approval date	Planning Submitted	Planning Granted	Est. SOS	Practical Completion
BUILD COMPLETE											
Uphall Road	Romsey	2	0	2 E&F	HSC		Mar-15	Aug-16	Dec-16	Jun-17	Jan-18
Nuns Way & Wiles Close	Kings Hedges	10	0	10 Tender	HSC		Mar-15	Aug-16	Jul-17	Jan-19	Aug-19
Ditchburn Place Community Rooms	Petersfield	2	0	2 Tender	S & R		Sep-18	Aug-18	Nov-18	Jan-19	Sep-19
Queens Meadow	Cherry Hinton	2	0	2 CIP	HSC		Jun-17	Dec-17	Jul-18	May-19	Jun-20
Anstey Way	Trumpington	29	0	56 CIP	HSC		Mar-17	Jan-18	Jul-18	Oct-18	Jun-20
Colville Garages	Cherry Hinton	3	0	3 CIP	HSC		Sep-17	Sep-18	Nov-18	May-19	Jul-20
Gunhild Way	Queen Ediths	2	0	2 CIP	HSC		Jan-18	Jul-18	Oct-18	May-19	Jul-20
Wulfstan Way	Queen Ediths	3	0	3 CIP	HSC		Sep-17	Oct-18	Jan-19	May-19	Sep-20
Markham Close	Kings Hedges	5	0	5 CIP	HSC		Jan-18	May-18	Oct-18	May-19	Sep-20
Mill Road	Petersfield	20	25	45 CIP	S & R		Nov-17	Dec-17	Jun-18	Aug-18	Apr-22
Ventress Close	Queen Ediths	13	0	15 CIP	HSC		Mar-17	Sep-18	Mar-19	Oct-19	Feb-21
Akeman Street	Arbury	12	0	14 CIP	HSC		Jun-18	Apr-19	Jul-19	Oct-19	May-21
Cromwell Road	Romsey	4	4	8 CIP	S & R		Mar-18	Mar-19	Jul-19	Dec-19	Jan-23
Sub total		107	29	167							
ON SITE											
Mill Road	Petersfield	98	93	191 CIP	S & R		Nov-17	Dec-17	Jun-18	Aug-18	Sep-22
Kingsway Medical Centre	Arbury	4	0	4 Tender	HSC		Sep-17	Sep-18	Apr-19	Nov-19	TBD
Cromwell Road	Romsey	114	173	287 CIP	S & R		Mar-18	Mar-19	Jun-19	Dec-19	Jan-23
Colville Phase 2	Cherry Hinton	47	0	67 CIP	HSC		Jan-19	Jul-19	Dec-19	Nov-20	Oct-22
Meadows and Buchan	Kings Hedges	106	0	106 CIP	HSC		Jan-19	Dec-19	Aug-20	Feb-21	Aug-24
Campkin Road	Kings Hedges	50	0	75 CIP	HSC		Jul-19	Nov-19	Mar-20	Mar-21	Apr-23
Sub total		419	266	730							
PLANNING APPROVED											
Clerk Maxwell Road	Newnham	14	21	35 S106	HSC		Jan-19	Dec-19	Jul-20	Jan-22	Mar-23
Sub total		14	21	35							
HSC APPROVED SCHEMES											
Tedder Way	Arbury	1	0	1 Tender	HSC		Jan-21	Dec-21	Mar-22	Jun-22	Jan-23
Kendal Way	East Chesterton	1	0	1 Tender	HSC		Jan-21	Jan-22	Apr-22	Jul-22	Feb-23
Sub total		2	0	2							
GRAND TOTAL		542	316	934							
Progress to 500 starts on site	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23					
Starts by year	2	159	162	203	14	2					
Cumulative total	2	161	323	526	540	542					
Progress to 500 Completions	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25			
Completions by year	2	0	17	56	8	303	128	28			
Cumulative total	2	2	19	75	83	386	514	542			

HSC Approved New programme schemes		06/01/2022									
Scheme Name	Ward	Net Affordable	Other	Total Homes	Delivery	Committee	Committee Approved	Planning Submitted	Planning Granted	Est. SOS	Practical Completion
L2 Orchard Park	SCDC	30	45	75	CIP	HSC	Sep-20	Aug-20	May-21	Dec-21	Aug-23
Colville Road Phase 3	Cherry Hinton	32	16	48	CIP	HSC	Sep-20	Jun-21	Dec-21	Apr-22	Apr-24
The Mews, Histon Road	Arbury	10	0	10	S106 Laragh	HSC	Sep-20	May-19	Feb-20	May-21	Dec-22
Fen Road - PHPP	East Chesterton	12	0	12	CIP	HSC	Jan-21	Feb-21	Jul-21	Feb-22	Jul-23
Ditton Fields - PHPP	Abbey	6	0	6	CIP	HSC	Jan-21	Feb-21	Oct-21	Feb-22	Sep-23
Aragon Close - PHPP	Kings Hedges	7	0	7	CIP	HSC	Jan-21	Jan-22	Mar-22	Aug-22	Feb-24
Sackville Close - PHPP	Kings Hedges	7	0	7	CIP	HSC	Jan-21	Jan-22	Mar-22	Aug-22	Feb-24
Borrowdale - PHPP	Arbury	3	0	3	CIP	HSC	Jan-21	Jul-21	Nov-21	Mar-22	Nov-23
Aylesborough Close Phase 2 - PHPP	Arbury	37	33	70	CIP	HSC	Sep-21	Mar-22	Sep-22	Dec-22	Jun-24
Paget Rd - ERDF Net Zero	Trumpington	7	0	7	Tender	HSC	Sep-21	May-22	Sep-22	Oct-22	Mar-24
St thomas Rd - ERDF Net Zero	Coleridge	8	0	8	Tender	HSC	Sep-21	May-22	Sep-22	Oct-22	Mar-24
Total new		159	94	245							

Progress to 1000 starts on site	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Starts by year	61	98							
Cumulative total	61	159	159	159	159	159	159	159	159

Progress to 1000 Completions	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Completions by year	0	10	80	69	0	0	0	0	0
Cumulative total	0	10	90	159	159	159	159	159	159

New Build Programme - 500 New Homes													
Scheme Name	Project stage	Net affordable homes	Total affordable homes	Budget per 2022/23 HRA BSR Table	Total Spend to 31 March 2021	Budget remaining 2021/22	Budget approval (Actual where schemes finally complete)	Budget RTB receipts (Actual where complete and closed)	Budget Devo grant funding (Actual where complete and closed)	Section 106 / Assumed Homes England Grant	Net cost to HRA	Total development cost per unit	Cost to HRA per unit
Uphall Road	Complete and closed	2	2	322,000	356,829.05	(30,296.52)	356,829	(105,330)	(242,596)	0	8,903	178,415	4,452
Nuns Way & Wiles Close	Complete and closed	10	10	1,976,189	1,941,427.58	4,464.90	1,941,428	(582,428)	(1,306,202)	0	52,797	194,143	5,280
Tedder Way	Pre-planning	1	1	506,000	14,743.00	491,257.00	506,000	(151,800)	0	0	354,200	506,000	354,200
Kendal Way	Pre-planning	1	1	524,000	32,071.50	491,928.50	524,000	(157,200)	0	0	366,800	524,000	366,800
Anstey Way	Build completed	29	56	11,285,455	11,192,302.16	93,152.84	11,285,455	(1,864,885)	(3,500,204)	0	5,920,366	201,526	105,721
Colville Garages	Build completed	3	3	820,180	819,177.33	1,002.67	820,180	(246,054)	(574,126)	0	0	273,393	0
Queensmeadow	Build completed	2	2	605,320	604,314.36	1,005.64	605,320	(181,596)	(423,724)	0	0	302,660	0
Wulfstan Way	Build completed	3	3	814,280	813,277.27	1,002.73	814,280	(244,284)	(569,996)	0	0	271,427	0
Markham Close	Build completed	5	5	1,186,650	1,209,519.75	0.00	1,209,520	(362,856)	(846,664)	0	0	241,904	0
Gunhild Way	Build completed	2	2	644,680	643,681.62	998.38	644,680	(193,404)	(451,276)	0	0	322,340	0
Ditchburn Place	Build completed	2	2	322,000	334,187.45	0.00	334,187	(101,148)	(233,039)	0	0	167,094	0
Mill Road	On site	118	118	24,965,630	22,181,635.33	2,783,994.67	24,965,630	(7,489,689)	(17,475,941)	0	0	211,573	0
Ventress Close	Build completed	13	15	3,640,090	3,590,089.78	50,000.22	3,640,090	(780,072)	(1,819,644)	0	1,040,373	242,673	69,358
Kingsway	On site	4	4	554,000	186,607.06	367,392.94	554,000	(166,200)	0	0	387,800	138,500	96,950
Cromwell Road	On site	118	118	24,865,800	17,556,718.53	7,309,081.47	24,865,800	(5,997,924)	(17,141,403)	0	1,726,473	210,727	14,631
Akeman Street	On site	12	14	4,526,720	4,432,390.37	94,329.63	4,526,720	(905,354)	(2,112,492)	0	1,508,874	323,337	107,777
Clerk Maxwell Road	Planning approved	14	14	3,046,760	17,813.00	3,028,947.00	3,046,760	(914,028)	(2,132,732)	0	0	217,626	0
Meadows and Buchan	On site	106	106	25,929,000	1,347,352.30	24,581,647.70	25,929,000	(7,778,700)	(8,626,115)	0	9,524,185	244,613	89,851
Colville Road Phase 2	On site	47	67	14,467,580	3,286,428.38	11,181,151.62	14,467,580	(2,743,431)	(6,343,881)	0	5,380,268	215,934	80,303
Campkin Road Phase 2	On site	50	75	18,063,260	3,658,840.19	14,404,419.81	18,063,260	(3,243,932)	(6,199,965)	(1,750,000)	6,869,363	240,843	91,592
TOTAL		542	618	139,065,594	74,219,406.01	64,855,481.20	139,100,718.83	(34,210,316.22)	(70,000,000.00)	(1,750,000.00)	33,140,402.61	225,082.07	53,625.25

Mean average

New Build Programme - 1,000 New Homes													
New Programme Scheme Name	Project stage	Net affordable homes	Total affordable homes	Budget per 2022/23 HRA BSR Table	Total Spend to 31 March 2021	Budget remaining 2021/22	Budget approval (Actual where schemes finally complete)	Budget RTB receipts (Actual where complete / on hold)	Budget Devo grant funding (Actual where complete / on hold)	Section 106 / Assumed Homes England Grant	Net cost to HRA	Total development cost per unit	Cost to HRA per unit
L2	On Site	30	30	6,207,000	2,000.00	6,205,000.00	6,207,000	(620,700)	0	0	5,586,300	206,900	186,210
Histon Road	On Site	10	10	1,978,000	134,407.00	1,843,593.00	1,978,000	(224,681)	0	0	1,753,319	197,800	175,332
Colville III	Planning submitted	32	48	12,649,000	61,279.58	12,587,720.42	12,649,000	0	0	(3,200,000)	9,449,000	263,521	196,854
Fen Road	Planning approved	12	12	3,931,000	107,969.15	3,891,130.30	3,931,000	0	0	(1,200,000)	2,731,000	327,583	227,583
Ditton Walk	Planning submitted	6	6	2,061,000	39,869.70	2,059,290.75	2,061,000	0	0	(600,000)	1,461,000	343,500	243,500
Aragon Close	Pre-planning	7	7	1,988,000	1,709.25	1,986,679.74	1,988,000	0	0	(700,000)	1,288,000	284,000	184,000
Sackville Close	Pre-planning	7	7	1,988,000	1,320.26	1,985,615.33	1,988,000	0	0	(700,000)	1,288,000	284,000	184,000
Borrowdale	Planning approved	3	3	914,000	2,384.67	898,507.08	914,000	0	0	(300,000)	614,000	304,667	204,667
Aylesborough Close	Pre-planning	37	70	19,030,000	0.00	19,030,000.00	19,030,000	0	0	(3,700,000)	15,330,000	271,857	219,000
St Thomas's Road	Pre-planning	8	8	2,105,000	0.00	2,105,000.00	2,105,000	0	0	(941,000)	1,164,000	263,125	145,500
Paget Road	Pre-planning	7	7	1,842,000	0.00	1,842,000.00	1,842,000	0	0	(824,000)	1,018,000	263,143	145,429

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Sustainable Housing Design Guide 2021





**Produced by Pollard Thomas Edwards
with Cambridge City Council**



**Pollard
Thomas
Edwards**

Page 74 This publication is now current and was noted at
the Housing Scrutiny Committee, 20 January 2022

Welcome to the Cambridge Sustainable Housing Design Guide 2021

Cambridge is a rapidly growing city and one of the UK's regional success stories. It is globally attractive as a business destination, as well as being a net contributor to the Exchequer at £1.5bn a year (Cambridge Ahead, CPIER, 2020). At the same time, Cambridge has been identified as the UK's least equal city (Cities Outlook, Centre for Cities, 2018) and a lack of affordable housing limits its growth.

There is a Housing Emergency in Cambridge. The median household affordability ratio (2018-2019) was 18.5 compared to a seven-year average of 14.3. The crisis affects low-to medium-income households, and demands a strategic programme level response. The council have responded to this emergency with the 500 programme, delivery of 542 council-rented homes by 2024 and the proposed 1,000 programme which is targeting the delivery of at least 1,000 council rented homes by 2030.

In 2020, the council declared a Climate Emergency and this, too, demands a response from the council. Commissioned by the council, The Road to Net Zero report by Buro Happold was approved in 2021 and outlines the route to Net Zero Carbon developments by 2030, detailing sustainability targets in energy, carbon, water, car parking, EV charging and biodiversity to attain. These sustainability targets are ambitious and challenging. This design guide will be updated if legislation changes and will take into account learning from the Council's new developments including its Passivhaus and Net Zero pilots. As well as examining new technologies that are coming onto the market, such as battery technologies and hydrogen boilers, and will take into consideration what impacts there will be on tenant energy bills, carbon reduction and annual maintenance costs.

We believe that the delivery of council homes can play a significant role in making developments sustainable, helping residents out of fuel and water poverty as well as ensuring affordable long term annual maintenance costs. By focusing on both affordability and sustainability we believe we can improve the health and wellbeing of residents and deliver high quality developments continuing the tradition of high-quality placemaking and architecture in Cambridge.

The Sustainable Housing Design Guide 2021 for council homes sets higher standards of development, leading by example to inspire others to deliver better. This Guide sets out a clear statement of our aspiration for developing quality homes and new communities that are sustainable, tenure blind, accessible, safe and secure, improving health and wellbeing.

Claire Flowers
Head of Housing
Development Agency,
Cambridge City Council

Executive summary

The Sustainable Housing Design Guide 2021 provides a summary of the council's expectations for sustainable design and placemaking for council homes.

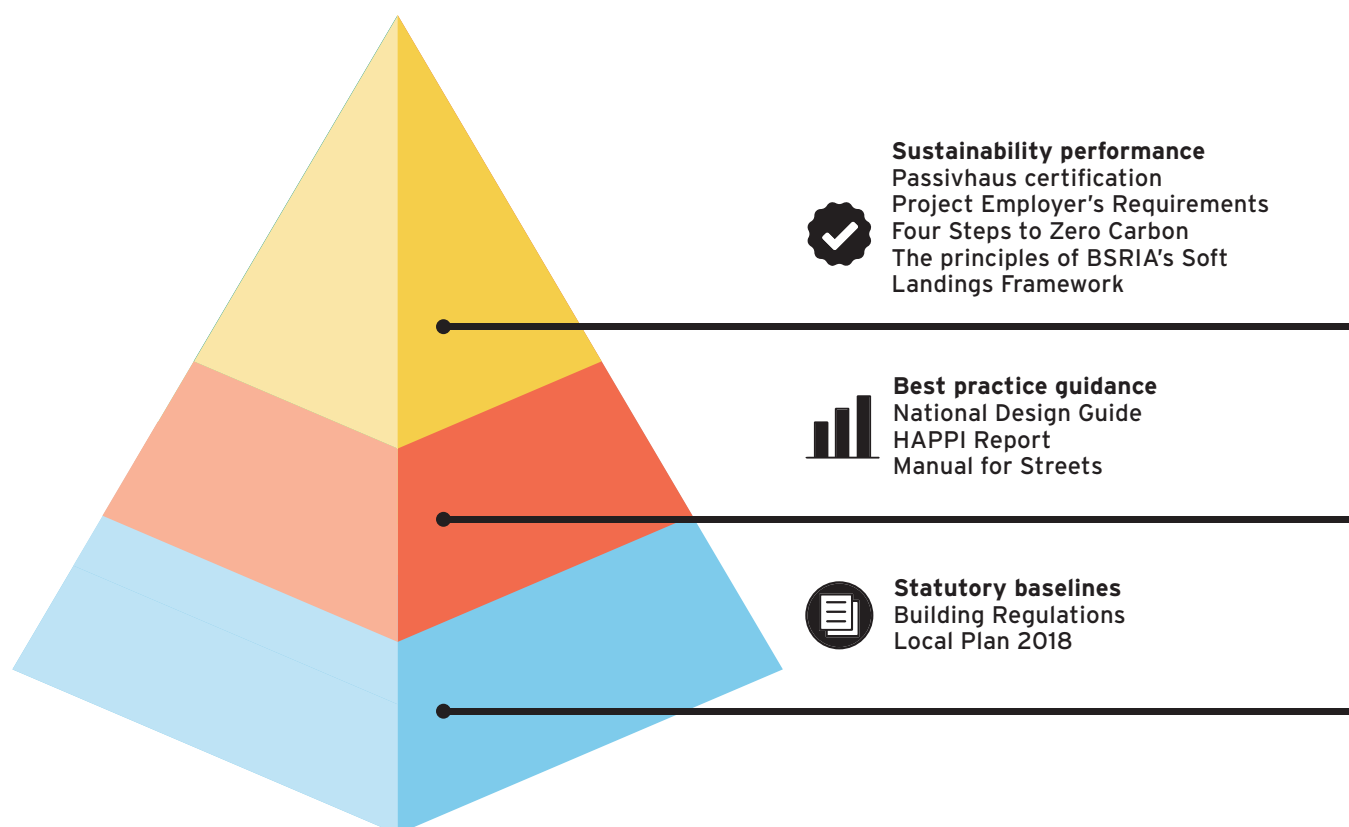
The Sustainable Housing Design Guide 2021 will guide the strategic brief for the project manager and design team and will form an integral part of any new designer's or developer's appointment. Integral to this Design Guide is the Buro Happold Four Steps to Zero Carbon, which establishes our roadmap to Net Zero Carbon, the 2018 Local Plan and relevant SPDs and our Standard Employer's Requirements (ER's) which provide more detailed technical guidance and specification.

From 2021 designs for all council homes must target Passivhaus certification and the sustainability targets outlined in the Four Steps to Zero Carbon report. From 2030 all council homes will be expected to target Net Zero Carbon.

It is vital we create places that are positively integrated into their communities and that engender "pride of place". Working with the MHCLG National Design Guide ten characteristics of a well designed place, this document draws together the many positive placemaking outcomes of sustainable design. Our text highlights how sustainable design and a spirit of good placemaking can work hand in hand to give us great places to live.

Delivering sustainable design is a rewarding but also challenging and layered process, requiring equal combinations of efficient technical performance and creative place-led design. While not a standalone document, the Sustainable Housing Design Guide 2021 is intended as a useful, design and place focused, primer - drawing together the varied tiers of standards and guidance that must be considered to create our housing projects.

The pyramid below illustrates how three tiers of standards work together and build upon each other. It establishes a hierarchy of design challenges, from a baseline of statutory standards through best practice benchmark guidance which must be followed, and ultimately the two stages of Passivhaus certification, the technical specifications of our ER's, and the principles of BSRIA's Soft Landings Framework.



The Sustainable Housing Design Guide 2021 (SHDG) should be read as a whole, alongside the further documents it refers to. Headline design and development guidance found within this document include the following project requirements:

Context

The design process must begin by demonstrating an understanding of the site, its context and the opportunities and constraints it presents for providing sustainable development.

Identity

Developments must convey “pride of place” by showing consideration to the quality of the built environment, coherent architecture, high quality landscaping and open space and generate a positive sense of belonging for residents which encourages a contribution to the upkeep of places in the long-term.

Built form

Proposals must make good use of land and resources. Compact forms of development must be used, and must show how they support communities, services, and promote walking and social connections.

Movement

Proposals must promote walking, cycling and public transport and reduce car dependency, with a target parking ratio of 0.5 spaces per home. Cycle parking must meet the Local Plan 2018. Local streets, public spaces and other routes must form convenient networks that are people, walking, and cycling focused.

Nature

All developments must provide a 20% biodiversity uplift on existing site conditions. Biodiverse SuDS should be incorporated into green landscape to provide habitat and give access to nature alongside play, activities and movement.

Public spaces

The quality of the spaces between buildings must be considered from the start of a project, and landscapes treated as important as the buildings themselves, meeting biodiversity targets and promoting walking and cycling. Public spaces within developments must be well sited, accessible, safe, secure, tenure blind and inclusive areas that promote social interaction. Developments must be safe and secure, meeting the SBD Gold Standard Certification.

Uses

Developments must be socially inclusive, diverse, and cohesive, with a mix of homes reflecting the needs of people of different ages and abilities and the council's housing requirements. Proposals should aim to reinforce existing neighbourhoods by enhancing local transport, facilities, community services and maximising their potential use.

Homes and buildings

All homes must meet the Nationally Described Space Standards and must be accessible to Part M4 Category 2 or above. The internal environments and associated external spaces that they provide will support the health and wellbeing of their residents and all who experience them.

Resources

Developments must achieve full Passivhaus certification and must reduce water demand, meeting a target of 90l/ppd. The principles of BSRIA's Soft Landings Framework must be followed to address resident fuel and water poverty.

Lifespan

Developments must be built to last, with maintenance, management and running costs considered at the outset - including addressing fuel poverty. Landscape and building designs must show how they incorporate long-term resilience to future climate change. Our developments must follow the principles of BSRIA's Soft Landings Framework.

To ensure good placemaking all developments must follow each of the principles and characteristics of The National Design Guide.



Sustainable neighbourhoods should incorporate a wide range of homes
Knights Park, Eddington, North West Cambridge. Pollard Thomas Edmonds and Alison Brooks Architects

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Background to this Design Guide and how to use it

This Design Guide will guide the strategic brief for the project manager and design team and will form an integral part of any new designer's or developer's appointment. Integral to this Design Guide is the Buro Happold Four Steps to Zero Carbon, which establishes the council's roadmap to Net Zero Carbon, the 2018 Local Plan and relevant SPDs and our Standard Employer's Requirements which provide more detailed technical guidance and specification.

From 2021, the design of council homes must target Passivhaus certification and the sustainability targets outlined in the Four Steps to Zero Carbon report. From 2030 all council homes will be expected to be designed to target Net Zero Carbon.

The principles in the guide are applicable to all housing developments delivered by the council and not just those delivered by the HDA. This guidance is also freely available to use for anyone seeking to deliver high quality sustainable new homes, be that in Cambridge or more widely.

2021 revised version

The council has led on sustainability and design, and its 2018 Local Plan demonstrates a commitment to developing schemes above the minimum standards. The Sustainable Housing Design Guide (SHDG) was first produced in 2017 and enhanced these standards further. This 2021 revised version builds on and maintains the Guide's founding objectives and outlines where standards are above the 2018 Local Plan.

The bulk of this document focuses on bolstering the quality of our sustainable placemaking guidance. We have recast and simplified our previous 26 design objectives around the ten characteristics of a well designed place, as set out within the recently published MHCLG National Design Guide. Using this framework has allowed us to focus on how sustainable principles should work together to make a successful places. Our document cross-references with the MHCLG National Design Guide and should be read alongside it.

Where references to technical standards are given, we have made use of the Buro Happold **Four Steps to Zero Carbon**. This document, commissioned by the council, provides a technically focused roadmap to Net Zero Carbon where energy, water and space, performance specifications and minimum requirements are included. The council is targeting Passivhaus from 2021 and Net Zero Carbon from 2030. There are also sustainability targets for water, car parking, EV charging, overheating and biodiversity. With their complementary placemaking and technical focus, the **SHDG (2021)** and **Four Steps to Zero Carbon** are intended to work alongside one another.

By adopting these documents and goals we intend to help establish, in development terms, a toolbox of technical and placemaking principles, beyond baseline planning and Building Regulations, that work together to give measurable outcomes. Beyond environmental and energy sustainability, it is important to note that these outcomes also include social sustainability in terms of health and wellbeing and economic sustainability in terms of operational cost.

It should be noted that this guide is not a comprehensive standalone document. It is intended as a helpful, illustrated summary of the principles that we expect development teams to adopt when developing sustainable housing projects, and the detailed guidance that should be referred to when doing so. Where reference is made to policy requirements for issues such as car and cycle parking, residential space standards and accessibility standards, it should be noted that this document is not formal planning guidance. A summary of local planning guidance documents is included in the appendices of this document.



The council has led the way on sustainable design, Akeman Street, Cambridge. Mole Architects

Compliance and Design Compliance Checklist

Guidance within the Sustainable Housing Design Guide contains two levels of compliance:

Where compliance is **mandatory**, the word '**must**' is used.

Where compliance is **recommended**, the word '**should**' is used.

We know that applying the targets on a site by site basis will mean challenges and constraints. The key for design teams is to ensure they communicate where targets may be difficult to achieve early on in the design process.

Where development teams are unable to follow mandatory guidance due to financial, viability and or technical constraints, design teams will be expected to justify why they cannot be met and provide alternative sustainable design approaches.

Where there are financial viability and technical constraints in meeting Passivhaus certification or other sustainability targets, design teams will be expected to justify why targets cannot be met and provide alternative sustainable design approaches.

The council is open to innovation and to alternative sustainable design approaches based on learning from council and other projects but should ensure that any sustainable design solution achieves the carbon emissions reduction, energy bills and annual maintenance costs to be equivalent to Passivhaus certification.

Where development teams do not follow recommended guidance, the departure must be justified and be shown to be consistent with good placemaking and the council's wider sustainable design objectives.

Note that these targets are assumed for sites where planning permission has not been granted.

Design teams are to complete the **Design Compliance Checklist** which is included within the appendices to this document. The checklist is a means to record and monitor design compliance with this document's design principles over the life of the project and must be reviewed and completed at each project stage and handed to the council's project manager.

The design team will also need to ensure that their designs comply with the council's **Employer's Requirements Checklist** which is included in the appendices. This checklist will be reviewed by council development, asset management, housing, communities, commercial, open spaces and finance teams before planning submission and before any build contract is signed.

Collaboration between designers, consultants, contractors, council's teams and resident representatives is essential and the principles of the BSRIA Soft Landings Framework must be followed. It is essential that design teams use the learning from the council's current and past schemes as well other developments to inform the design.



Green mews streets, Accordia, Cambridge.
Grant Associates and FeildenCleggBradleyStudios

02

Placemaking guidance:

Applying the ten characteristics to Cambridge sustainable housing design

The values underlying good sustainable design are the same as for making any successful place - bringing together buildings, landscapes, and infrastructure to create a characterful whole. Many sustainable principles go beyond technical specifications and need to be delivered through thoughtful placemaking - recognising that the spaces between buildings are as important as the buildings themselves.

Reflecting the universal need for good design, this guidance makes use of the MHCLG National Design Guide and National Design Code ten characteristics of good design. Such design values are already well established in Cambridge and are reflected in the 2010 Cambridge Quality Charter for Growth '4 Cs' of Community, Connectivity, Climate and Character.

For each of the ten characteristics we have set out some of the key issues we expect to be addressed in our housing projects. These are not exhaustive, but aim to highlight areas which we think might have specific implications for delivering the objectives of sustainable design. Cross-references are given to link with the National Design Guide, which should be read alongside each section of this document, along with other helpful references such as the council's Four Steps to Zero Carbon, HAPPI, and Manual for Streets.

Context



In developing new proposals, the design process must begin by demonstrating an understanding of the site, its context and the opportunities and constraints it presents for providing sustainable development. Creating a positive and integrated sense of place helps to foster a sense of inclusion, community cohesion and belonging, contributing to the sustainable design objectives of good health and wellbeing, sustainable communities and social value.

An understanding of context

An understanding of context is a vital first step in delivering well integrated high-quality development. The context of a proposal must be considered early on as part of the design process. Existing features, opportunities, and constraints on the site, such as trees, topography and orientation, must be identified, along with the surrounding networks of buildings, routes, ecology and landscapes. Emphasis must be put on opportunities for developments to create networks for people and nature, and should target a 20% improvement in biodiversity within the site. They must link well into their context, promote cohesion and enhanced sustainable lifestyles for the benefit of new and existing residents.

Scale and form

Proposals for new development must create a scale and form that enhances urban design and that is appropriate to existing buildings, the public realm and open spaces. A development that responds positively to its context is one that will either enhance areas of existing high-quality, or will seek to introduce new distinctive qualities to areas of weaker character. Designs must complement the positive local identity of an area, but well-designed places do not need to copy their surroundings in every way. It is appropriate to introduce elements that reflect how we live today, to include innovation or change such as increased densities, reducing car dependency, promoting active lifestyles and to incorporate new sustainable features or systems.

The outcome of this thorough understanding and well considered response must be the successful integration of sustainable new housing development into the social fabric and the natural, built, and historic environment.



Four Steps to Zero Carbon
Section 15



National Design Guide
Guidance C1, C2 and C3
Manual for Streets
Section 3



Local Plan 2018
Policies 28, 55 and Section 7



New developments should complement their context
Woodside Square, Muswell Hill, London. Pollard Thomas Edwidge

Identity



Arrangements of buildings, using families of details, can create a strong sense of identity
The Avenue, Saffron Walden, Pollard Thomas Edwards

Developments must convey “pride of place” by showing consideration to the quality of the built environment, coherent architecture, high quality landscaping and open space and generate a positive sense of belonging for residents which encourages a contribution to the upkeep of places in the long-term.

There are many aspects that come together to help deliver “pride of place”: delivering a feeling of belonging and regarding a place as home. As well as the quality of individual buildings, these aspects include identity at the level of the home, the street and the neighbourhood and a positive physical and social integration with the surrounding context.

In bringing about “pride of place” there is a role for developers and their design teams in engaging with the community in the development of schemes and in the long-term support that is offered to them. Consideration must be shown to have been given to the quality of the built environment, coherent architecture, high quality landscaping and open space, with each element coming together to deliver a built environment that residents will take pride in.

Consideration of identity must include:

- The role of quality of finish and the interplay between homes and the spaces around those homes in delivering schemes in which residents have a sense of “pride of place”, and can contribute to the upkeep of those places. “Pride of place” must be visible;
- Impact of car and service vehicles on sense of place must be minimised. Local street networks must prioritise their role as a setting for the people and homes that surround them, promoting landscape, sociability, play, walking, and cycling;
- Landscape design must be an integral element of all proposals maximising biodiversity, with a multifunctional approach taken to landscape design wherever possible. Landscape design must not be seen as an issue for the reserved matters stages of the planning process. On larger sites, a landscape strategy must be devised that includes plans for implementation, management and maintenance;

- Sustainable Drainage Systems (SuDS) should be integrated into landscape design. Water management within the landscape is a special characteristic of Cambridge, and the SuDS should be a recognisable part of a development’s identity;
- Tree planting must be utilised wherever possible to enhance biodiversity, lend character, ambience and shade. Trees can soften the impact of parking, help enhance biodiversity (if the right species are chosen), absorb CO₂, improve air quality and provide evaporative cooling – improving the microclimate around homes;
- Street trees must be carefully specified, located and planted within tree pits, taking account of their eventual size and being kept clear of underground services, with coordination between the landscape architect and services consultant;
- Street trees should be planted as semi-mature with a stem girth measurement of at least 150mm, this is to give an established landscape structure from the outset;
- Public open spaces should be located and used to give schemes an identity, and must ensure that spaces are tenure blind and designed for everyone and are multifunctional;
- Long-term management plans must be provided for all communal spaces and public open spaces;
- Questions relating to “pride of place” should be included in post occupancy resident surveys.



Four Steps to Zero Carbon
Page 4 and Section 15



National Design Guide
Guidance 11, I2 and I3



Local Plan 2018
Policy 31 and Section 7

Built form



The routes and spaces between buildings are as important as the buildings themselves
Marmalade Lane, Cambridge. Mole Architects

Proposals must make good use of land and resources. Compact forms of development should be used, and must show how they support communities and services and promote walking and social connections. Buildings, routes and landscapes need to be designed in positive relationship to each other to create attractive, sustainable, coherent and safe places to live. Built form can have important implications for the practical delivery of energy efficient, sustainable homes - all of which need to be balanced with positive placemaking.

Built form is the three-dimensional pattern or arrangement of development blocks, streets, buildings and open spaces. It is the interrelationship between all these elements that creates an attractive and sustainable place to live, rather than simply their individual characteristics. Well-designed places create a positive sense of place and promote sustainability.

Compact forms of development must be used, and must be walkable, reducing emissions through active travel and contributing positively to wellbeing and placemaking. Achieving compactness through good design to raise development densities with efficient use of developed land, will be fundamental to delivering sustainable homes and neighbourhoods.

Consideration must also be given to:

- In terraced homes and apartments, servicing and storage of bins, cycles and car parking to ensure good street frontages;
- Sustainable buildings and places need to deliver, and perform well in their context. Proposals should be digitally modelled and tested at an early stage for daylight, sunlight, overheating, overshadowing and, where relevant, wind.

Aspects that should be considered include:

- Access to local public transport, services and facilities, helping support existing services to ensure sustainable development;
- Recognisable streets and other spaces with their edges defined by buildings, with natural surveillance promoting safety;
- Networks of routes, making it easy for anyone to find their way around;
- Memorable features or groupings of buildings should be used, with spaces, uses or activities that create a sense of place, promoting inclusion and cohesion.



Four Steps to Zero Carbon
Section 9



National Design Guide
Guidance B1, B2 and B3
Manual for Streets
Section 2



Local Plan 2018
Policy 57

Movement



Being well connected is fundamental to delivering sustainable developments, promoting social cohesion, health and wellbeing, support for local services, and mixed sustainable transport modes. Proposals must promote walking, cycling and public transport and reduce car dependency, with a target maximum parking ratio of 0.5 spaces per home. Cycle parking must meet the Local Plan 2018. Local streets, public spaces and other routes must form convenient networks that are people, walking, and cycling focused. Their success must be assessed in how they contribute to the quality and character of the place, not only how well they function.

Patterns of movement play a significant role in whether a person becomes socially isolated. Physical access to friends and family, health services, community centres, shops, open spaces and other places and spaces enable individuals to build and maintain their social relationships. Poor transport links create barriers to social inclusion, whereas effective transport links benefit social cohesion, enabling individuals to play a more active role in their community. Promoting active transport choices, walking and cycling, is a key tool in both raising health and wellbeing and combating transport poverty associated with car dependant neighbourhoods. In designing new developments, we need to be aware of the elements that can create barriers to social inclusion and maximise opportunities for people to build social relationships and create healthy neighbourhoods.

A connected network of routes

Successful development depends upon a movement network that makes connections to destinations, places and communities, both within the site and beyond its boundaries. A well-designed movement network must define a clear pattern of streets and routes that:

- Is safe and accessible for all;
- Functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes;
- Limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality;
- Promotes activity and social interaction, contributing to health, wellbeing, accessibility and inclusion;
- Incorporates green infrastructure, including street trees, and helps to improve air quality and contribute to biodiversity.

Proposals should make use of Manual for Streets principles, which put pedestrians first. Local neighbourhood streets, with little vehicle movement, should be designed for low traffic speeds and prioritise space for pedestrians, play and nature rather than cars and service vehicles, and reflect their function as public open spaces and as a setting for the homes that surround them.

Reducing car parking, and the need for travel by private car

A good starting point for creating better streets is to reduce the number of cars that need to be stored on and around them.

Part of this can be done by reducing parking provision, and projects must aim for a ratio of around 0.5 parking spaces per home. Consideration must be given to parking allocation for larger family homes taking into account the views of the planning authority and the council's housing team.

Infrastructure must be provided with capacity for all spaces to have Electric Vehicle (EV) charging taking into consideration where the network operator confirms enough capacity is available. In tandem with reducing parking itself, developments must also take steps to reduce the need for a private car.

There are many methods that can be employed to reduce the need for people to travel by private car, thereby reducing the impact of large numbers of car journeys and excessive car storage. Options to consider must include mixed use developments; complementary uses within the surrounding area; walkable neighbourhoods; car club provision; travel plans for new developments; provision of Electric Vehicle charging points; provision of travel information packs for new residents and ensuring that schemes are served by high quality public transport and cycle networks to allow for a reduction in reliance on private cars. Housing should be located within 400m of high-quality public transport routes.



A green lane, Abode, Cambridge. Proctor Matthews Architects

Prioritising walking and cycling

Developments must maximise opportunities for people to meet their day-to-day needs using sustainable modes of transport, particularly walking and cycling. This must include:

- Designing footpaths and cycle paths along 'desire lines' to key destinations both in the vicinity of the area and in the wider community;
- Locating cycle parking for maximum convenience of access and ensuring cycle parking is safe and secure;
- Ensuring paths are safe and appropriately lit while minimising light pollution, with natural surveillance from adjacent buildings;
- Minimising disruption to pedestrian and cycle routes from the road network and car parking layout;
- Incorporating traffic calming measures; ensuring that there are good walking and cycling routes to and from key bus routes and that sufficient cycle parking is provided at bus stops.

Connecting to surrounding cycle networks

Part of the contextual analysis for proposals must include consideration of the location of existing pedestrian and cycle networks, so that these can provide a starting point for design. Where possible, existing networks should be integrated into new developments, with improvements and/or enhancements provided where required. This could include minor upgrading of junctions, signage and/or pavements and cycle paths; re-routing sections of cycle paths where necessary. Consideration should also be given to planned improvements to pedestrian and cycle networks in the vicinity of new developments and whether there is potential for schemes to link in with these. During the construction phase, appropriate measures should be implemented to ensure that construction works do not obstruct routes. In order for the use of sustainable modes of transport to become part of residents' normal routine, it is vital that these networks are in place and fully functional prior to first occupation.



Footpaths and cycle paths along 'desire lines', Mosaics, Oxford.
Pollard Thomas Edwards and Alison Brooks Architects

Developing an appropriate cycle parking strategy

Cycle parking provision must be integrated into the design of new developments from the outset, in order for high quality developments to be realised.

The visual impact of all forms of parking and storage must be mitigated through a comprehensive landscape strategy to ensure that buildings and parking respond to one another. Parking must not be seen to dominate the street scene. Examples include cycle shelters covered with sedum/green roofs and the use of rain gardens and tree planting in car parking areas.

When prioritising the relative demands of provision, cycle parking should be maximised, and car parking/storage should be reduced where possible. Providing enough convenient and secure cycle parking at people's homes and other locations, for both residents and visitors, is critical to increasing the use of cycles. In residential developments, designers must aim to make access to cycle storage secure and convenient - in principle as quick and easy to access as car parking. For houses where cycle parking might need to be in a rear garden, then access must be kept short, convenient and unobstructed.

Local Plan 2018 standards for residential cycle parking must be followed:

- Conveniently sited;
- Accessible and easy to use;
- Safe and secure;
- Covered;
- Fit for purpose;
- Well managed and maintained;
- Attractive.

The table below sets out the minimum targets for cycle parking that are to be delivered.

In addition to this, as E-bikes become increasingly common, access to a power sockets should be incorporated into secure stores.

A further consideration when designing space for cycle parking is the increasing use of cargo bikes and cycle trailers. Providing adequate space for such bikes, while important for all schemes, will be of particular importance when considering car free developments, as the use of such bikes can replace cars for many local trips, for example school/nursery drop offs and the weekly shop.

Use	Minimum standard
Residential dwellings	1 space per bedroom up to 3 bedroom dwellings Then 3 spaces for 4 bedroom dwellings, 4 spaces for 5 bedroom dwellings etc Visitor cycle parking next to main entrances to blocks of flats Visitor cycle parking in the form of a wall ring/bar or Sheffield stand at the front of individual houses must be provided where cycle parking provision is located in the back garden
Guesthouses and hotels	2 spaces for every 5 members of staff 2 spaces for every 10 bedrooms (minimum 2 spaces) Outside the City Centre, this should include space for cycle hire
Nursing homes	2 spaces for every 5 members of staff 1 visitor space for every 6 residents (minimum 2 spaces)
Retirement homes/sheltered housing	2 spaces for every 5 members of staff

Local Plan cycle parking table



Four Steps to Zero Carbon
Section 16



National Design Guide
Guidance M1, M2 and M3

Manual for Streets
Sections 4 and 5



Local Plan 2018
Appendix L



Nature



Natural planting and SuDS drainage systems can be combined with high densities
New Garden Quarter, Chobham Farm Zone 4, Newham, London | © 2016 Thomas Edwards

All developments must target a provision of a 20% biodiversity uplift on existing site conditions creating the improvement on site as far as possible. Where this is not possible, then designs should target off-site provision, but should aim for areas close by the development site. The biodiversity uplift should be demonstrated using the DEFRA biodiversity metric calculator.

Access to nature has an important role to play in promoting the health and wellbeing of residents, and all scales of development offer opportunities for the protection and enhancement of biodiversity. On smaller sites this can include the use of biodiverse roofs, the design of SuDS features to enhance biodiversity, the role of native planting schemes and the integration of nesting opportunities into the architectural design of buildings.

Developments must integrate new and existing natural features into a multifunctional network that supports quality of place and social use in tandem with biodiversity and water management, and addresses climate change mitigation and resilience. This includes natural and designed landscapes, high quality public open spaces, street trees and other trees, grass, planting and water. Open spaces should be well located on the network of routes, easy to access, with activities for all to enjoy, such as play, food production, recreation and sport. These encourage physical activity and promote health, wellbeing and social inclusion.

All scales of development present opportunities to create and improve the public realm. Open space and landscaped areas that respond to their context and the development as a whole are designed as an integral part of the scheme. These spaces can take many forms, including:

- Private amenity spaces - gardens, balconies, terraces and roof terraces/gardens;
- Biodiverse green roofs;
- Threshold landscaping and planted boundaries;
- Spaces that can become a focal point for communities, that encourage social interaction and recreation, for example well located shared spaces and play areas;
- Consideration should be given to ways in which residents can be engaged in the upkeep of communal green spaces, for example areas that are set aside for community gardening and food growing.

Larger sites should offer opportunities for biodiversity by creating networks of connected green spaces that offer safe cover for the movement of species as part of a coherent landscape strategy with a range of habitats. Consideration should also be given to the wider context of sites, where this network can have the potential to connect with existing habitats. Access to a range of open spaces, both private and communal, is an important element of well-designed new developments that help to create healthy communities with a good quality of life.



Resident food growing area, New Ground Cohousing, Barnet.
Pollard Thomas Edwards

The distinction between the public and private realms must be clear, with careful consideration to boundary treatments and the role of materials and landscape features in delineating these spaces, for example the use of SuDS such as rills to mark the boundary between the public and private realm.

In flatted schemes, the aim must be to ensure that all flats have access to communal space that:

- Is overlooked by surrounding development;
- Is accessible and tenure blind to all residents of the block;
- Is designed to take advantage of direct sunlight;
- Has suitable management in place.

The importance of biodiversity and ecology in high quality new development

Proposed developments must result in a 20% biodiversity net gain. Each site will offer its own opportunities and challenges to achieving this. Early in the design process the following approaches must be included:

- Retaining existing natural features. Existing mature trees are best retained in managed common areas, and care should be taken to not unduly compromise the use of neighbouring private amenity;
- Maximising the benefit of green spaces and creating interconnected green networks, for example bringing together tree canopies, green roofs, vertical greening, pocket parks, green corridors;
- Ensuring that site appraisal includes a habitat survey that extends beyond the site boundaries and leads to mitigation and enhancement measures as part of the landscape and drainage strategies;
- Identifying ways in which biodiversity enhancement can be integrated into the design of schemes, including the role of landscape and drainage strategies, as well as consideration of measures integrated into building design.

Other approaches should include:

- Landscaped biodiverse SuDS features should be used wherever possible, rather than heavily engineered solutions;
- Identifying opportunities to engage with the community in installing nest boxes and monitoring the biodiversity enhancement of the scheme;
- Creating 'productive' landscapes for urban food production;
- Specifying appropriate levels of street and building lighting with careful consideration of the impact on wildlife, particularly protected species. Street lighting should be designed with a pedestrian perspective, with low height luminaires providing consistent unobtrusive lighting.

All sites must carry out an Extended Phase 1 Habitat Survey. This will help guide the design of the site, and will provide the baseline for the required 20% biodiversity uplift.



*An avenue of trees becomes a new public route
The Avenue, Saffron Walden. Pollard Thomas Edwards*



Four Steps to Zero Carbon
Section 15



National Design Guide
Guidance N1, N2 and N3



Local Plan 2018
Policies 31, 59



Public spaces



The quality of the spaces between buildings must be considered from the start of a project, and landscapes are as important as the buildings themselves, meeting biodiversity targets and promoting walking and cycling. Public spaces within developments must be well sited, accessible, safe, secure, tenure blind and inclusive areas that promote social interaction. They must be safely and conveniently accessed by the surrounding neighbourhood via the route network. Spaces should aim to bring people together, combining activities such as socialising, informal doorstep play, resting and movement. Developments must be safe and secure, meeting the SBD Gold Standard Certification.

Public spaces are streets, squares, and other spaces that are open to all. They are the setting for most movement. The design of a public space encompasses its siting and integration into the wider network of routes as well as its various elements. Public spaces can combine hard and soft landscaping, and should be sized to reflect their intended uses, but need not be large. In trafficked areas with multiple users such as cars, cyclists and pedestrians, areas for movement or parking need to be carefully considered to protect the primary function of the public space as a place of social interaction.

In many new developments, competing demands for the use of land mean that green and open space must be increasingly multifunctional and must include:

- Making a positive contribution to climate change by helping new developments adapt to and mitigate its impact, for example through promoting the greening of new developments;
- Improving water quality, flood mitigation and reduced flood risk through the use of SuDS;
- Promoting walking and cycling;
- Creating a sense of place and opportunities for greater appreciation of the landscape and cultural heritage;
- Providing well designed spaces that are safe;
- Good access to quality, private or privately shared amenity space, ensuring proper demarcation between private amenity space and communal or public realm.

Other approaches should include:

- Providing space for local food production;
- Providing space for outdoor education and children's play;
- Protection and enhancement of biodiversity;
- Increasing recreational opportunities and access to open space to promote healthy living;
- Creating well-located, high quality and attractive public spaces.

Places that provide a safe environment for all

A safe environment will encourage pedestrian movement, healthy active lifestyles, social connections and a sense of ownership at an individual and group level. In designing new developments, care must be taken to 'design out' features and areas that may contribute to crime or a fear of crime. A key tool in this is to have active frontages with frequent entrances, windows and habitable rooms at street level, while also allowing for privacy. When designing the provision of open spaces within developments consideration should be given to the following:

- Spaces are safer when they are easily accessible and well used. Spaces and places should be sited and integrated into the wider network of routes and bring together different users and supporting interaction;
- Natural surveillance - Is the space located in the sight-line of nearby houses, apartments and other areas of activity to ensure visibility? Could activity areas be clustered to provide greater informal surveillance within and between areas?;
- Lighting should be designed to reflect pedestrian use, with low height luminaires used and located to provide consistent but unobtrusive lighting where required;
- Risk assessment and mitigation at an early stage of the design process, so that security measures can be integrated into positive design features.



Employer's Requirements

SBD Gold Standard Certification required



National Design Guide

Guidance P1, P2 and P3



Homes can be incorporated over many other mixed uses to bring homes into the city.
The Scene, Walthamstow, London. Pollard Thomas Edwards



Even quite small spaces, if well located, can become a well loved public space
Deptford Market Yard, Lewisham, London. Pollard Thomas Elwick

Uses



Developments must be socially inclusive, diverse, and cohesive, with a mix of homes reflecting the needs of people of different ages and abilities and the council's housing requirements. Proposals should aim to reinforce existing neighbourhoods by enhancing local transport, facilities, and community services, and maximising their potential use. The mix of homes, with a compact form of development, should aim to reinforce existing places by enhancing local transport, facilities and community services, and maximising their potential use.

A mix of home tenures, types and sizes must reflect the council's preferred housing mix of home sizes

Where different tenures are provided, these must be well integrated and designed to the same high quality to create tenure blind homes and spaces, where no tenure is disadvantaged. Design must avoid layouts or features that could create actual or perceived barriers, or contribute to segregation, both within the development and with its surroundings.

Developments, particularly larger ones, should look for opportunities to provide a diverse mix of homes. By bringing together homes from apartments to small and large family houses, we aim to enable inclusive, economically and socially sustainable, mixed-income, and multi-generational living. This includes families, extended families, older people, young people and students, and people with physical disabilities or mental health needs.

The mix of homes and tenures, within a compact form of development, should aim to reinforce existing places by enhancing local transport, facilities and community services, and maximising their potential use.

A mix of uses

Using local resources such as shops, schools, nurseries, community facilities, parks, other open spaces, health, and religious or cultural facilities as destinations in layouts. This promotes social interaction and integration and help combat loneliness.

Where new non-residential uses are proposed, these should help support and enhance walkable provision for the local community, promote cohesion and not undermine existing services. Multi-purpose, flexible space should be considered in these circumstances.

Socially inclusive

Where different tenures are provided, they must be well-integrated and designed to the same high quality to create tenure neutral homes and spaces, where no tenure is disadvantaged.

Avoid layouts or features that could create actual or perceived barriers, or contribute to segregation, both within the development and its surroundings.

Combat isolation by exploring ways to bring older people into sites in central areas, where they can benefit from local services. Homes and developments for older people should follow HAPPI principles, which take into account a range of considerations when designing homes. Many of these are sound principles of good design, the benefits of which will be felt across all age groups.

Other housing models

Cohousing projects are a powerful tool in building sustainable neighbourhoods, with a strong focus on social interaction, sharing facilities and collective stewardship. Cohousing projects are developed by and with their residents, meaning sites need to be identified early at the feasibility stage. "Pocket" homes may also be appropriate in some locations - but these homes must be accompanied by enhanced provision of shared space and amenities.



Shared common room, Marmalade Lane, Cambridge. Mole Architects



National Design Guide
Guidance U1, U2 and U3
HAPPI Principles



Local Plan 2018
Policy 50 and 51

Homes and buildings



Homes should be a joy to use, inside and out.
Knights Park, Eddington, Cambridge. Pollard Thomas Edmonds and Alison Brooks Architects

All our homes must meet the Nationally Described Space Standards and must be accessible to Part M4 Category 2 or above. The internal environments and associated external spaces that they provide will support the health and wellbeing of their residents and all who experience them.

Functional design

Good design promotes quality of life. Buildings need to be a joy to use – providing comfort, safety, security, amenity, privacy, accessibility, and adaptability. They will be efficient and cost effective to run. All designs must address fuel poverty – for example factoring in costs of water heating as well as space heating. As Passivhaus homes, they must have good sunlight, daylight and ventilation, avoid overheating, minimise sound pollution and have good air quality, while providing comfort and personal control for their users.

Space

Space at home has a significant impact on quality of life. As noted by the RIBA, lack of space can compromise basic lifestyle needs that people take for granted, for example having enough space to store possessions, play, exercise and entertain friends. It can also have more profound knock-on effects on health, educational attainment, family relationships and even social cohesion. The importance of the functional design of space cannot therefore be understated.

Homes and communal areas must meet Nationally Described Space Standards for room sizes and follow the ER's on floor-to-ceiling heights, internal and external storage. All homes must be accessible, and must meet the access standards for Part M4 Category 2 or above, meeting planning policy.



*Homes should frame the spaces around them
Goldsmith Street, Norwich. Mikhail Riches*

'Smart' homes

New sustainable homes should look to incorporate new technologies to benefit their residents. This includes supporting home-working, reducing bills and energy use by energy monitoring, through to helping an elderly relative to live independently in their own home for longer. A 'smart' or 'connected' home is best thought of as a spectrum of electrical and digital applications, combined with a well-designed, flexible and adaptable home.

External spaces and services coordination

Every home must have good access to a quality, private or privately shared, amenity space ensuring proper demarcation between private amenity space and communal or public realm.

All private and shared external spaces should encourage positive uses, feel "owned", valued, and function well. Amenity spaces should have a reasonable degree of privacy, taking care to think about how they relate to the wider context, and how they are likely to be used.

Homes must relate positively to the spaces around them, contributing to social interaction and inclusion. Details of operation, servicing, waste collection and storage should be resolved so that they are unobtrusive and well-integrated into their neighbourhoods.



Employer's Requirements

Floor to Ceiling Heights

External Amenity

Passivhaus certification



National Design Guide

Guidance H1, H2 and H3

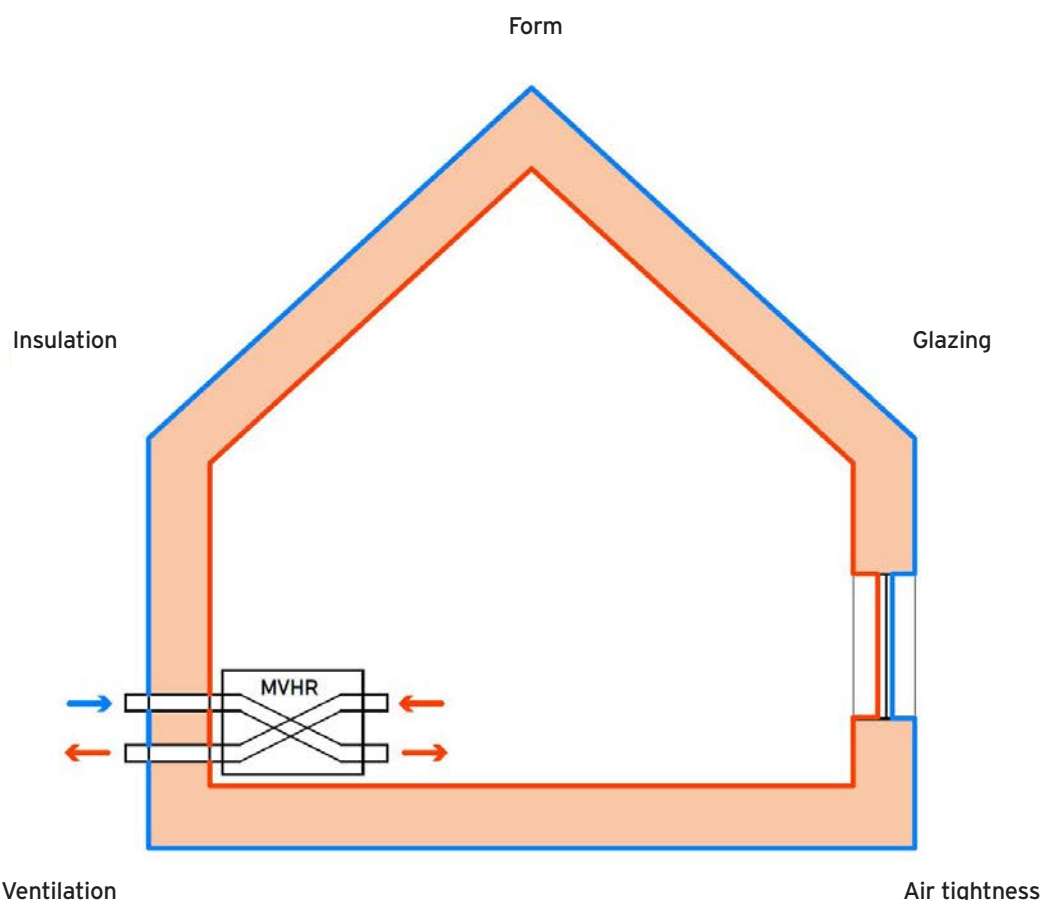
Manual for Streets

Section 5



Local Plan 2018

Policy 50 and 28



The five principles of Passivhaus. Pollard Thomas Edwards



Resources



Developments should aim to retain existing trees and planting, and value them as an asset.
Accordia, Cambridge. Maccreeanor Lavington

We need well-designed, sustainable places and buildings that conserve natural resources including land, water, energy and materials. Developments must be efficient and resilient to climate change, designing out performance issues and performance gaps meeting sustainability targets.

Developments must make good use of resources, hierarchy, and be fit for purpose. They must be robust and adaptable to reduce the need for future redevelopment and unnecessary waste. The design, construction and management/use of the homes should make use of modern technologies including Building Information Management (BIM) digital modelling, off-site construction and energy use monitoring.

All scales of development should take opportunities to contribute to the achievement of wider resource conservation goals and local social initiatives, for example Cambridge Sustainable Food.

Reducing water consumption

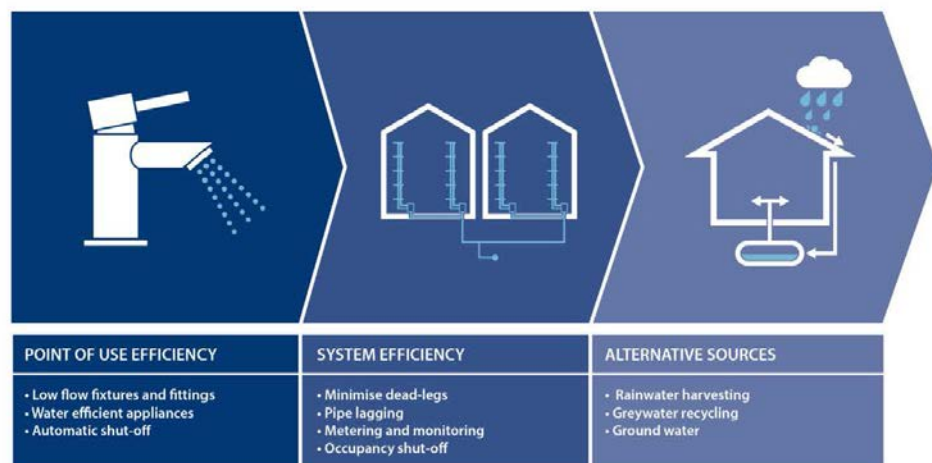
Cambridge is an area of water stress and as such it is important that all new developments include measures to reduce potable water consumption.

As well as helping to conserve water resources, reduction of water consumption will help our residents reduce their water bills, an approach of increasing importance for those residents already facing fuel poverty. Integrating measures into new homes is far more cost effective than retrofitting measures at a later date.

The starting point must be to reduce demand through fittings and all developments must achieve a minimum of 90l/ppd without need for recycling. This means designs must follow the guidelines in the table below.

It is also important that water efficiency beyond homes is considered. Irrigation of communal landscaping and private gardens must also be taken into consideration, with priority given to the use of rainwater harvesting for irrigation. For homes with private gardens, careful consideration should be given to the location of down pipes so that each property can utilise water butts. Grey water harvesting must be avoided unless targeting Net Zero Carbon.

	Bathroom to have	
	Shower only	Small bath
1 bed flat	✓	
2 bed flat	To be reviewed with housing on a site by site basis	
2 bed house		✓
3 bed house		✓



Resource efficiency at all development stages

To ensure resource efficiency is effectively delivered, it must be considered early, following the energy hierarchy, meeting sustainability targets. It must then be reviewed at each subsequent stage of the design and development process in a logical way – changing focus as more detailed technical aspects are being developed.

Concept design: Location, understanding the context and placemaking

Early decisions about the scope of a site, how a design is sited and how it relates to its context are likely to be fundamental to the environmental footprint of a development; the resources it will consume in its delivery, and then subsequently over its lifetime.

A compact and walkable neighbourhood, with access to a mix of uses and facilities, reduces demand for energy and supports health and wellbeing. It uses land efficiently so helps adaptation by increasing the ability for CO₂ absorption, sustaining natural ecosystems, minimising flood risk and the potential impact of flooding, and reducing overheating and air pollution.

Neighbourhoods, links, green spaces and facilities should all be designed to promote and encourage healthy sustainable lifestyles. Emerging proposals should be based on the analysis of the site and surrounding context and be laid out to retain trees and other natural features, where possible. Orientation and sun paths should be understood to allow light and views to be optimised and shading principles to be incorporated early.



Buildings should aim to keep simple lines to the façades, with efficient building envelopes. Anstey Way, Trumpington, Cambridge. Rock Townsend

Design development

The massing and design of the blocks can have a significant impact on the total inherent space heating demand of the building. This can be measured as its “form factor” – the ratio of external surface area to floor area. A lower form factor means a denser building form, reducing heat losses per sqm of floor area.

Design teams must assess and optimise the “form factor” of proposals, balanced with the site's constraints and design requirements. Generally, buildings should aim to keep simple lines to the façades, prioritise projecting balconies over inset, joining homes at a common point to avoid corners, and decrease roof areas. For family houses, joining homes together to create terraces can be a key tool in reducing form factor.

Proposals must be tested for their overshadowing, overheating, and impact on daylight and sunlight. This must be used to help inform the ongoing design development of the layouts and optimise elevation designs and openings. Layouts must prioritise providing dual aspect homes and avoid single aspect where possible.

Likely construction techniques should be discussed at this stage. Modern Methods of Construction (MMC) should be used where possible to help reduce construction waste and raise quality. Exact construction methods and build-ups are typically unknown at this point. To help deliverability, we would recommend that external wall thickness should typically be set to at least 500mm for all planning stage work.

Detailed design and delivery

Design specification must be assessed and the sustainable design commitments, and construction on site must be monitored. To help ensure sustainability objectives are delivered, these should include:

- Implementation of Building Information Modelling (BIM) to ensure collaboration across all disciplines to further maximise resource efficiency;
- Responsible sourcing of materials, with consideration given to materials with low embodied energy, local sourcing and materials made from renewable or waste resources;
- Implementation of the design for deconstruction principle, to enable resources to be reused at the end of a buildings lifetime.

- Encourage regular client monitoring with site visits, as this is critical to delivering site quality, for example reviewing fitting of insulation to avoid cold bridging and the installation of HVAC equipment;
- Careful monitoring of construction processes to ensure goals for waste minimisation are achieved, for example through the use of the BRE's SMARTWaste initiative or other similar approaches.

Closing the performance gap and post occupancy testing

The performance gap, that between the anticipated design performance and actual built performance, must be closed. Designs must follow the principles of the BSRIA Soft Landings Framework throughout the design, construction and post occupancy stages of the development identifying and resolving performance gap risks between the anticipated design performance and actual built performance.

Design teams should note that the council will undertake Post Occupancy Evaluation (POE) by monitoring progress annually over the first 5 years. On previous schemes where there has been POE, the council will share any lessons.

In addition, post occupancy monitoring and evaluation is important so that we can learn from what has worked well, and what has not worked so well. When designing new developments, lessons must be learnt from previous projects for key performance criteria, such as energy use, carbon reduction, water use, indoor air quality, internal temperatures and performance of renewable/low carbon energy.

A further important element that will help determine the success of the specification is feedback from residents using resident satisfaction surveys. These should be specifically tailored to understand residents' experience of living in new homes; for example, how they rate the quality and performance of their new homes and how they view the quality of the context within which the development sits. This is information that is rarely collected from residents in new developments but is vital in furthering our understanding of the role of the built environment in improving people's health and wellbeing.



Four Steps to Zero Carbon

Section 8, 9, 10, 12 and 14

BSRIA's Soft Landings Framework



National Design Guide

Guidance R1, R2 and R3

HAPPI Principles



Local Plan 2018

Policy 28 and 31

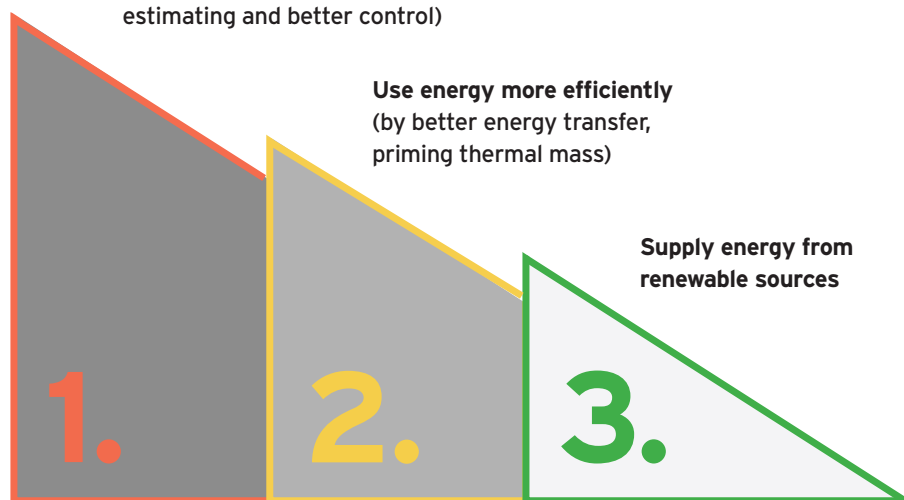
Reduce need for energy

(by improved insulation, more accurate estimating and better control)

Use energy more efficiently

(by better energy transfer, priming thermal mass)

Supply energy from renewable sources



The energy hierarchy

Lifespan



Thoughtful stewardship should be visible and celebrated
Goldsmith Street, Norwich. Mikhail Riches

Our developments must convey a sense of ownership, with well-designed places and thoughtful stewardship sustaining their beauty over the long term. Developments must be built to last, with maintenance, management and running costs considered at the outset - including addressing fuel poverty. Landscape and building designs must show how they incorporate long-term resilience to future climate change. Our developments must follow the principles of BSRIA's Soft Landings Framework.

Developments will help to generate “pride of place” and be designed to maintain that positive identity with a long-term view. This is to be demonstrated with high quality, timeless, contemporary design, with attention paid to finish and detailing during construction. The use of high quality, durable materials and careful detailing is essential, not only to help reduce long term maintenance costs, but to promote “pride of place” amongst residents, who will ensure that their homes are looked after in the future.

Taking a long term view must include:

- Collaborative working between all disciplines at the heart of all projects;
- All developments require care and must be designed with a view to long term management, so that they are cost-effective to run and maintain. Without compromising sustainable objectives, maintenance issues must be 'designed out' as far as practicable;
- Where available, maintenance/estates and facilities teams must be involved in the design process so that they are familiar with systems being proposed, and training can be provided prior to installation of unfamiliar systems so that they can be effectively operated and maintained post construction.



Year-long post occupancy testing, Virido, Clay Farm, Cambridge. Pollard Thomas Edwards

Homes where residents are supported and can understand how to run their home cost effectively and efficiently

Building sustainable homes must help the council address fuel poverty. Affordability for residents to heat and power their homes is a priority for the council.

In order for residents to fully realise the benefits of living in sustainable, energy efficient new homes, it is important that they understand how the systems in their new home work, so that they can operate them effectively. Evidence shows that where systems, including controls, are overly complex, residents often feel that they have little control over the environment in which they live. At worst, this can lead to higher energy bills for residents and a poor internal living environment with subsequent health impacts.

The following principles must be followed:

- User friendly design of building systems/ controls, for example heating and ventilation controls, to ensure that they are easy to understand and work effectively;
- Support in the form of schemes such as BSRIA's Soft Landings Framework should be utilised to ensure that residents have access to professional post occupancy after-care and support.

The following principles should be followed:

- Consideration given to new ways of delivering simple home user guides, with consideration given to the role of 'smart' or 'connected' homes in providing guidance. Homeowners should not just be given paper manuals, as these often do not get used;
- Provision of smart meters to make energy and water consumption highly visible. This should also extend to renewable energy systems where provided, so residents can see how much energy they are generating. Remote monitoring and energy management can also help this.

Resilience

Our climate is changing and as a result it is important that all developments give consideration to climate risks and design-in measures to enable new homes and their residents to adapt. Climate risks are, a general warming, but also increased risk of extreme weather events such as flood, drought and extreme heat waves.

The key principle should be to ensure that adaptability is designed into schemes, so that residents do not have to rely on complex technologies that are expensive to run.

It is also important to look to measures beyond new homes themselves, seeking opportunities within the landscape setting of developments for adaptation.

This will often require a multidisciplinary approach to design in order to maximise benefits, recognising the role of all members of the design team in responding to climate change.

Adaptation measures can be implemented at a variety of scales, and consideration should be given to the following measures:

- The use of SuDS and flood resilient architecture;
- Drought resistant planting;
- Greening the environment to provide evaporative cooling and to help shade buildings;
- Implementing resilient architecture and construction to minimise impacts.

Overheating

In the context of global temperatures rising due to climate change, and predictions of further increase in the upcoming years, managing overheating in homes is essential.

When considering adaptation strategies, it will be important to ensure that they are appropriate for the context in which the development sits and that they do not conflict with other strategies. All developments must follow the cooling hierarchy when considering design interventions to avoid overheating and undertake a TM59 assessment using climate data to 2050.

For example, in areas of poor air quality, careful consideration will need to be given to ventilation strategies to ensure that buildings do not overheat and that good levels of indoor air quality and thermal comfort are maintained. In such circumstances, the importance of designing out issues such as overheating, for example through the use of building overhangs or external shading, becomes even more important.

The residential properties we are building now will be in use in 2050 and beyond. It is therefore essential that dwellings designed today will be able to avoid overheating not only when they are completed under today's standards, but in 30 years' time, when temperatures have risen.

Fire

The council's Employer's Requirements sets higher standards than for Building Regulations for fire on the use of combustible materials, compartmentation/sprinklers, in the provision for a place of 'relative safety' for persons of limited mobility.

All designs to be reviewed and approved by the council's fire officer before planning submission.



Employer's Requirements

Sound insulation
Lifetime costs
Asset management
Technical reviews

Four Steps to Zero Carbon Section 13 and 14

BSRIA's Soft Landings Framework



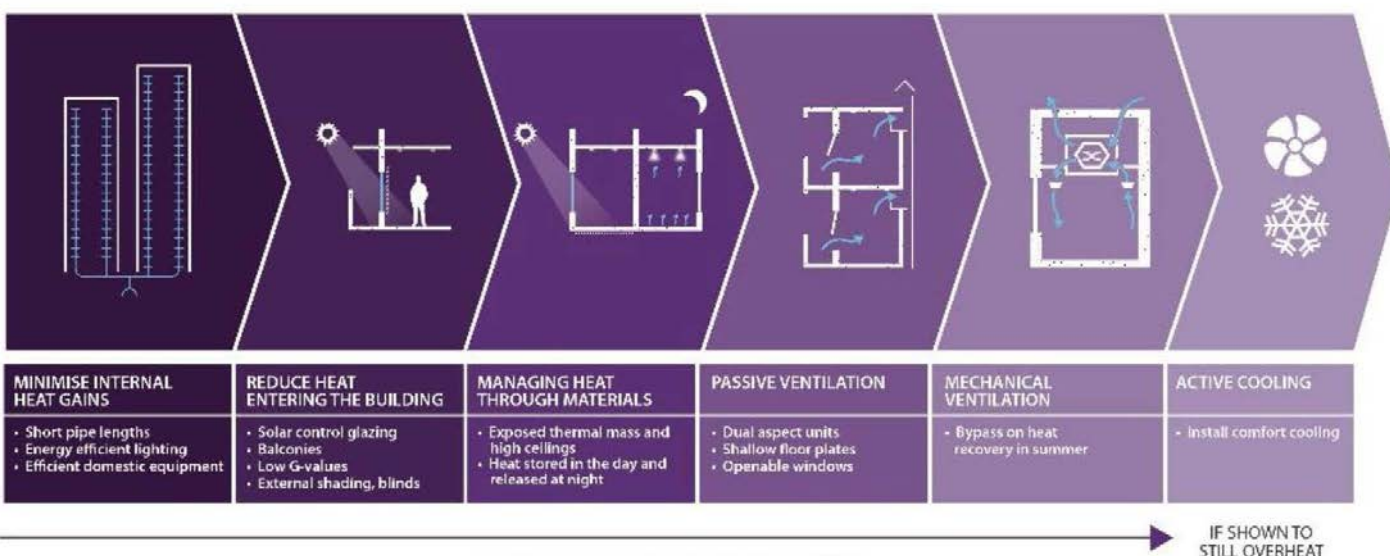
National Design Guide

Guidance L1, L2 and L3



Local Plan 2018

Policy 31 and 28



The cooling hierarchy GLA

03

Appendix

This guide is intended as an illustrated summary of the principles of high quality sustainable design and delivery that we expect development teams to adopt when producing our housing projects.

The following appendices have been included to give some key reference policy documents referred to in the text, which can be referred to for further technical and in-depth design guidance on the topics covered in this summary.

Useful reference documents

2018 Cambridge Local Plan www.cambridge.gov.uk/media/6890/local-plan-2018.pdf

- C1 Sustainable Design & Construction SPD Draft for consultation
- C4 Cambridge Walking and Cycling Strategy
- C15 Sustainable Design & Construction SPD
- C17 Car Park & Cycle Standards (2004)

BSRIA Soft Landings Framework

www.bsria.com/uk/consultancy/project-improvement/soft-landings/

Draft Biodiversity Supplementary Planning Document, Greater Cambridge Shared Planning, 2021

<https://www.greatercambridgeplanning.org/media/2316/qcsp-biodiversity-planning-doc.pdf>

Four Steps to Zero Carbon, Buro Happold, 2021

HAPPI Principles, Housing Learning and Improvement Network

www.housinglin.org.uk/Topics/browse/Design-building/HAPPI

Manual for Streets Department for Transport and Department for Communities and Local Government, 2007

www.gov.uk/government/publications/manual-for-streets

Manual for Streets 2 Department of Transport, 2010

www.gov.uk/government/publications/manualforstreets-2

MHCLG, Nationally Described Space Standard

www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard

National Design Guide Ministry of Housing, Communities and Local Government, 2021

www.gov.uk/government/publications/national-design-guide

RIBA Sustainable Outcomes Guide RIBA, 2019

www.architecture.com/-/media/GatherContent/Test-resources-page/Additional-Documents/RIBASustainableOutcomesGuide2019pdf.pdf

The Greater Cambridge Sustainable Design and Construction Supplementary Planning Document

Greater Cambridge Shared Planning, 2020

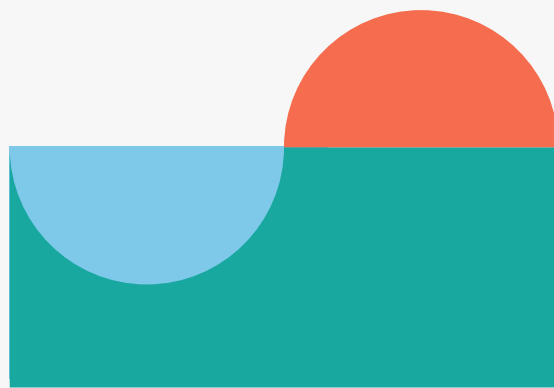
<https://www.cambridge.gov.uk/media/8157/greater-cambridge-sustainable-design-and-construction-spd.pdf>

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		p.40	Anstey Way by Rock Townsend / Cambridge City Council © Cambridge City Council
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		p.43	Virido by Pollard Thomas Edwards / Hill © Simon Harvey Photography
		p.45	The Cooling Hierarchy by Greater London Authority

Revisions

Rev	Date	Notes





CAMBRIDGE CITY CARAVAN SITE LICENSING & FEE POLICY

To:

Councillor Mike Todd-Jones Executive Councillor for Housing

Housing Scrutiny Committee

20th January 2022

Report by:

Claire Adelizzi, Team Manager – Residential

Tel: 01223 457724 Email: claire.adelizzi@cambridge.gov.uk

Wards affected:

All

Not a Key Decision

1. Executive Summary

- 1.1 The Caravan Sites and Control of Development Act 1960 (CSCDA 1960) introduced a licensing system to be operated by Local Authorities to regulate the establishment and operation of caravan sites in their area of which there are currently two in the City further details of which can be found here: [Caravan and camp sites - Cambridge City Council](#)
- 1.2 Subsequently the enactment of the Mobile Homes Act 2013 introduced the ability for Local Authorities, (LA's), to charge site owners fees for applying for a site licence, for amendments or transfers of existing licenses, for annual fees and for site owners depositing site rules with the Local Authority.
- 1.3 Additionally, the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 now require LA's to introduce a fit and proper person test for mobile home site owners, or the person appointed to manage the site.

- 1.4 The above factors combined have created a need for an encompassing policy setting out how the Council will carry out its statutory responsibilities for caravan site licensing, inspection, fit and proper person determination enforcement and fee setting.

2. Recommendations

The Executive Councillor is recommended to:

- 2.1 Approve the adoption of the proposed Cambridge City Caravan Site Licensing & Fee Policy as attached in Appendix A of this report.

3. Background

- 3.1 Under the Caravan Sites and Control of Development Act 1960 the Council issues site licences for caravan park homes which that have relevant planning permission of which there are currently 2 licensed sites within the City.
- 3.2 The legislation has since been amended by the Mobile Homes Act 2013 which aims to raise standards in the industry. This also provides for enforcement that is more effective when site licence holders fail to comply with their licence obligations.
- 3.3 The changes relating to site licencing came into force on 1 April 2014. Licences issued under the 1960 Act still remain in force, but the new enforcement powers apply for Local Authorities, enabling them to charge fees for functions relating to 'relevant protected sites'.
- 3.4 A relevant protected site is defined in the Mobile Homes Act 2013 as any land to be used as a caravan site other than one where the application for a licence is:
- For holiday use only, or
 - Subject to restrictions or conditions, which limit the times of the year when the site may be used for stationing caravans for human habitation.

- 3.5 Relevant protected sites to which the legislation applies are typically known as residential parks, mobile home parks, park home sites and Gypsy and Traveller sites.
- 3.6 Other sites which are not relevant protected sites, are still subject to licencing under the 1960 Act, but no fee is required to be paid.
- 3.7 Following the subsequent implementation of the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 and setting of a fee for inclusion in Fit and Proper Person Register under the Regulations, the council is proposing the introduction of an encompassing Caravan Site Licensing and Fee Policy.
- 3.8 The policy document forms Appendix A to this report and covers the following within its scope:
- 3.9 **Licensing conditions, inspections & enforcement** – The Councils responsibility for the licensing of caravan sites includes the application and enforcement of appropriate conditions. The specific purposes for which conditions can be applied are set out in Section 5 of the CSCDA 1960. Site licence conditions may be determined with reference to national Model Standards. ‘Model Standards 2008 for Caravan Sites in England Caravan Sites and Control of Development Act 1960 – Section 5’ form Appendix 1 of the policy. The Council has the power to update site licence conditions in line with Model Standards as modified from time to time by the Government. The aim of such standards is to promote the safety and welfare of the residents.
- 3.10 CCC carries out scheduled annual inspections of all licensed sites following which site owners are advised of any actions required to ensure compliance with the site licence conditions.
- 3.11 **Site Rules** - Site rules are different to site licence conditions in that they are neither created nor enforced by local authorities. They are a set of rules created by the site owner for residents to comply with. They may reflect the site licence conditions but will also cover matters unrelated to licensing. Regulations made under The Mobile Homes Act 2013 require site rules to be deposited with the Local Authority. Site rules for the existing two caravan sites within the City are held on the Councils register of site rules accessed via this web link on the Councils website [Caravan and camp sites - Cambridge City Council](#)

- 3.12 **Fit & Proper Person Assessment Criteria** - The Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 (SI 2020/1034) (“the Regulations”) introduce the requirement for caravan site owners to apply to their Local Authority for the relevant person (themselves or their appointed manager and anyone involved in the day-to-day management of the site) to be added to the register of Fit and Proper Persons managing sites in their area. This will involve an application and assessment process. When conducting the fit and proper person assessment, the local authority must have regard to:
- (i) whether the person has a sufficient level of competence to manage
 - (ii) the site;
 - (iii) the management structure and funding arrangements for the site or
 - (iv) the proposed management structure and funding arrangements.

These points for consideration have been included in this section of the policy which forms Appendix A to this report.

- 3.13 **Fees for licence, annual inspection and Fit & Proper Person Register applications** - When fixing a fee, the Local Authority:

- Must act in accordance with its fees policy
- May fix different fees in different cases
- May determine that no fee is required in some cases.

- 3.14 Any fees charged must fairly cover the costs (or part of the costs) incurred by the Local Authority in performing its function under Part 1 of the 2013 Act (excluding the costs of enforcement action or any functions relating to prohibiting caravans on commons or provision of sites by the Local Authority itself).

- 3.15 In setting its fees policy and the fees to be charged, the Council had regard to the Ministry for Housing, Communities and Local Government guidance for setting licencing fees under the 2013 Act which enables the Council to be able to charge for:

- The issuing of the first site licence.
- Generic fees for all sites for the issuing of the licence.
- Annual renewal: monitoring and administration of existing site licences.
- The depositing of site rules.
- The transfer of a licence.
- The alteration of a licence (initiated by the site owner).

- The inclusion of a relevant person to the Fit and Proper Person register.

3.16 Section 10A (5) of the 1960 Act (as amended by the 2013 Act) states that a fees policy must include provision about the time at which the annual fee is payable. For the purpose of the policy, the period covered by the annual fee will be 1 April to 31 March and will be invoiced on the 1 April each year or as soon as practicable after.

3.17 A summary of the fees for each of the processes set out on this policy are shown below. These are broken down fully in Appendix 2 of the Cambridge City Caravan Site Licencing & Fee Policy, which is attached as Appendix A to this report:

Fee Type	Fee
New Site licence fee, (inc. depositing of rules & update of the public register).	£320
Annual inspection fee, (inc. transfer / variation).	£256
Application to register Fit & Proper Person, (5 yearly registration).	£384

4. Implications

a) Financial Implications

Administration of this legislation and the associated requirements will be delivered through existing resources within the Residential Team, part of the Council's Environmental Services Environmental Health Department. The ability to recover the Council's cost in administration of providing this element of the service will contribute to the overall cost of providing this service.

b) Staffing Implications

None. It is anticipated that the relatively minor number of applicable applications will be administered through existing resources.

c) Equality and Poverty Implications

Please see attached Equality Impact Assessment (EqIA)

d) Net Zero Carbon, Climate Change and Environmental Implications

There are no climate change or environmental related implications associated with this policy therefore the overall rating is 'Nil'.

e) Procurement Implications

None.

f) Community Safety Implications

None.

5. Consultation and communication considerations

There is no requirement for any consultation in relation to this policy. Current caravan site licence holders within the City have been advised of this, particularly the required fit and proper person assessment and associated fee charging structure.

6. Background papers

Background papers used in the preparation of this report:

- [Caravan Sites and Control of Development Act 1960 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/1960/25)
- [Mobile Homes Act 2013 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2013/15)
- [The Mobile Homes \(Requirement for Manager of Site to be Fit and Proper Person\) \(England\) Regulations 2020 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2020/1250)
- [Mobile Homes Act 2013: a guide for local authorities on setting licence fees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/mobile-homes-act-2013-a-guide-for-local-authorities-on-setting-licence-fees)

7. Appendices

Appendix A - Cambridge City Caravan Site Licensing & Fee Policy

8. Inspection of papers

To inspect the background papers or if you have a query on the report please contact Claire Adelizzi, Team Manager – Residential, tel: 01223 457724, email: Claire.adelizzi@cambridge.gov.uk.



Cambridge City Caravan Site

Licensing & Fees Policy

January 2022

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Appendix 2 Calculation of fees & charges	Page 25-26

1.0 Introduction

Under the Caravan Sites and Control of Development Act 1960 (CSCDA 1960) Cambridge City Council, (CCC), issue site licences for caravan park homes that have relevant planning permission.

Part 1 of the CSCDA 1960 introduced a licensing system, to be operated by Local Authorities to regulate the establishment and operation of caravan sites.

Section 29 of this Act defines what constitutes a caravan and caravan site.

This legislation has been amended by the Mobile Homes Act 2013, (MHA 2013) which aims to raise standards in the industry and provide for more effective enforcement when site licence holders fail to comply with their licence obligations.

Housing has changed since the 1960s and many sites now accommodate Mobile Homes. The CSCDA 1960 is still applicable for licensing these sites but the amendment of the CSCDA 1960 with the introduction of the MHA 2013 will bring the legislation up to date with current housing needs.

The changes relating to site licensing came into force on 1 April 2014. Licences issued under the CSCDA 1960 still remain in force, but the new enforcement powers apply, and local authorities are able to charge fees for functions relating to “relevant protected sites”.

Relevant Protected Sites

A “relevant protected site” is defined in the Act as any land to be used as a caravan site other than one where the application for a licence is:

- For holiday use only, or
- Subject to restrictions or conditions which limit the times of the year when the site may be used for stationing caravans for human habitation (e.g., planning conditions).

Site licence exemptions

The first schedule of the CSCDA 1960 sets out cases where a site licence is not required, including:

- Sites where use is incidental to a dwelling-house and within the same curtilage.
- Sites for stationing of a caravan for not more than 2 nights (as long as any caravans had not been present on the site for more than 28 days during the previous 12 months).
- Sites where caravans are stationed on land not less than five acres, for not more than 28 days and no more than three caravans are stationed at any one time.
- Sites occupied and supervised by organisations holding a certificate of exemption.
- Sites where caravans are solely for seasonal agricultural/forestry workers employed on land owned by the site owner.

- Sites where caravans are solely for workers employed in building or engineering operations on that or adjacent land.
- Sites used by travelling showmen who are members of a relevant organisation.
- Sites owned / occupied by the licensing authority.
- Individual permanent residential mobile homes.
- Touring sites.
- Holiday sites.

The Council cannot licence a caravan site unless planning permission has been granted. Therefore, in relation to any new site licence applications received the planning authority will be consulted to confirm that the site has planning permission for the relevant use.

CCC will decide to either licence the site or refuse a licence within 8 weeks of receipt of a duly made application. Where a licence is refused, the applicant will be advised of the reasons for refusal and their right of appeal.

CCC consider it appropriate to make single pitch sites exempt from annual licence fees (but not other fees) as their inspection and fee collection arrangements would not be cost effective nor would it add value. Sites which do not fall within the definition of “relevant protected sites” are still subject to the licensing requirements contained within the CSCDA 1960, but the provisions relating to payment of fees do not apply.

This Policy sets out how CCC will carry out its statutory responsibilities for caravan site licensing, inspection, enforcement, and fee setting. Provision is made for:

- Clarification of the expectations regarding the standards to be met by owners of caravan sites within the District.
- A register of all residential sites including site licence conditions and site rules that are deposited with CCC.
- Fit & Proper Person determination criteria.
- A Fit and Proper Person Register.
- Determination and annual review of site licensing fees and enforcement charges.

Alongside its Policy the Council will:

- Provide advice and assistance to site owners / managers & occupiers of mobile homes and caravans to ensure they can live in safe and healthy homes.
- Ensure that any enforcement action taken by CCC is effective and proportionate.

2.0 Licensing conditions, inspections and enforcement

The Councils responsibility for the licensing of caravan sites includes the application and enforcement of appropriate conditions. The specific purposes for which conditions can be applied are set out in Section 5 of the CSCDA 1960. Site licence conditions may be determined with reference to national Model Standards. 'Model Standards 2008 for Caravan Sites in England **Caravan Sites and Control of Development Act 1960 – Section 5**' form **Appendix 1** of this policy. CCC has the power to update site licence conditions in line with Model Standards as modified from time to time by the Government. The aim of such standards is to promote the safety and welfare of the residents. The applicable Model Standards were issued in 1983 for touring sites, 1989 for holiday sites and 2008 for residential sites. A link to the model standards for residential sites is available on the Councils website.

CCC carries out scheduled annual inspections of all licensed sites following which site owners are advised of any actions required to ensure compliance with the site licence conditions.

The main focus of enforcement activity will be informal advice and education, including the provision of necessary information to ensure compliance with all necessary related legislative requirements and licensing conditions. Formal enforcement action will be taken under the relevant legislation only when informal action has failed to secure an acceptable improvement in standards or compliance with licence conditions. Any use of enforcement powers will be in accordance with Cambridge City Council Corporate Enforcement Policy.

Section 9A of the CSCDA1960 (as amended by the MHA2013) allows local authorities to serve compliance notices on site owners where a site licence condition is breached. These notices will set out what the site owner needs to do to correct the breaches within prescribed timescales. Service of a notice will attract a charge based on the Councils chargeout rates at that time. Failure to comply with a notice would be a criminal offence and the Local Authority may consider taking legal proceedings. Any costs associated with this process would be at the discretion of the court. Following a successful prosecution for breaching a compliance notice, CCC would be able to serve notice to enter the site and carry out the necessary works themselves (known as "works in default").

The cost of deciding whether to take action, preparing and serving the various enforcement notices and the actual work itself can be recovered by Local Authorities through recharging for works in default. Unpaid expenses can be placed as a charge against the site owner's land. The administration charge that is added to the cost of works when recovering expenses relating to works in default includes the cost of the work plus officer time once a notice has been breached.

In addition, Section 9E allows a notice to be served on site owners enabling the Local Authority to enter the site and take emergency action where there is an imminent risk of serious harm.

Enforcement charges will be based on an hourly rate reflecting the costs of enforcement, plus any additional costs incurred (e.g. legal costs). Site owners may not pass on enforcement charges to residents in their pitch fees.

3.0 Site Rules

Site rules are different to site licence conditions in that they are neither created nor enforced by local authorities. They are a set of rules created by the site owner for residents to comply with. They may reflect the site licence conditions but will also cover matters unrelated to licensing.

The MHA2013 makes amendments to the Mobile Homes Act 1983 in relation to site rules. Regulations made under the MHA2013 require existing site rules to be replaced with new site rules which must be deposited with the Local Authority within a specified timescale. A Local Authority need to satisfy itself that replacement or new site rules deposited with them have been made in accordance with the procedures prescribed by statute.

CCC are required to establish, keep up-to-date and publish a register of site rules including the variation or deletion of site rules where necessary, this can be found on the Councils website.

4.0 Fit and Proper Person Assessment Criteria

A relevant protected site cannot operate unless the Local Authority is satisfied that the manager qualifies as a Fit and Proper Person. Sections 12A -12E of the CSCDA 1960, as implemented by Section 8 of the MHAct 2013.

A site owner under the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 (SI 2020/1034) (“the Regulations”) must apply to their Local Authority for the relevant person (themselves or their appointed manager and anyone involved in the day-to-day management of the site) to be added to the register of Fit and Proper Persons managing sites in their area (“the register”).

The site owner may only apply to be added to the register if they hold, or have applied for, a site licence for the site. This provision also applies where the site owner or site manager is a registered company.

A person’s inclusion on the register will be for such period as the Local Authority may decide, but that period must not exceed 5 years.

The Evidence

When conducting the fit and proper person assessment, the local authority will consider the following points relevant to the application:

- 1. Is the individual able to conduct effective management of the site?** This includes, but is not limited to, securing compliance with the site licence and the long-term maintenance of the site. It follows that, the local authority must have regard to:

- (i) whether the person has a sufficient level of competence to manage the site;
- (ii) the management structure and funding arrangements for the site or
- (iii) the proposed management structure and funding arrangements.

(a)Competence to manage the site

This includes reviewing the competency of the appointed individual. The individual must have sufficient experience in site management, or have received sufficient training, and be fully aware of the relevant law as well as health and safety requirements.

(b)The management structure and funding arrangements for the site

The local authority will consider whether relevant management structures are in place and whether they are adequate to ensure effective management of the site. The local authority will want to ensure that the applicant has a robust management plan, this will be reviewed to ensure it addresses the following issues: the pitch fee payment, proximity of the manager to the site, manager’s contact details for residents (including out of office and emergency contact details), the complaints procedure, maintenance, staffing, and refuse removal.

It is advisable that the site is managed by an applicant based in the UK and a management structure would be unlikely to be suitable if the applicant is an individual, or a company (including its directors), which does not reside in the UK or have a permanent UK address. This is because there may be complex issues as a result of this. Should this happen, legal advice will be obtained. The applicant's interest in the land will also have an important impact, as would their financial standing, management structures and competence, all of which could contribute to the overall assessment of their suitability to manage the site effectively.

(c) The proposed management structure and funding arrangements in place for managing the site

The local authority will consider whether the applicant has sufficient funds (or has access to sufficient funds) to manage the site and comply with licence obligations. Evidence of these funds should be readily available.

Another consideration is if funding is through a third party (including an associated company), the local authority should be wary if this is not disclosed as this will impact on the local authority's ability to deem whether the application is financially viable.

2. Personal information relating to the applicant concerned. This would include a criminal record check and should include evidence that the applicant:

- (a) has not committed any offence involving fraud or other dishonesty, violence, firearms or drugs or any offence listed in Schedule 3 to the Sexual Offences Act 2003 (offences attracting notification requirements).
- (b) has not contravened any provision of the law relating to housing, caravan sites, mobile homes, public health, planning, or environmental health or of landlord and tenant law.
- (c) has not contravened any provision of the Equality Act 2010 in, or in connection with, the carrying on of any business.
- (d) has not harassed any person in, or in connection with, the carrying on of any business.
- (e) is not or has not been within the past 10 years, personally insolvent.
- (f) is not or has not been within the past 10 years, disqualified from acting as a company director.
- (g) has the right to work in the United Kingdom and,
- (h) is a member of any redress scheme enabling complaints to be dealt with, in connection with the management of the site (when this is in place).

3. Records of harassment relating to the applicant concerned. Local authorities have a duty to investigate any conduct which could amount to harassment and any evidence obtained should be reviewed to determine whether it is sufficient to be used to prosecute a site owner. Local authorities may also rely on convictions by the courts as evidence of harassing behaviour which would reduce the risk of the local authority being successfully challenged on any refusal to approve an applicant on this basis.

A local authority may have records of previous harassment complaints made against a site owner or their manager. Even if no action was taken on these complaints the local authority will take these into consideration in the fit and proper person determination.

These complaints may identify further potential risks and can also provide an indication of potential underlying problems with the management of the site or the site owner's lack of experience/skills in dealing with customers. The local authority may also wish to address any underlying issues by attaching conditions to the individual's entry on the register. Upon rejection of a person's application by any other local authority this will be centrally recorded and include the details of the person involved and the reasons for the rejection.

4. Other items that will be taken into consideration

- a) "The applicant" is defined at paragraph 2 of the Regulations as "the person who makes an application under regulation 6".
- b) The "relevant person" is also defined at paragraph 2 of the Regulations to mean "the subject of the fit and proper person assessment under Regulation 7".
- c) The conduct of any person associated or formerly associated with the relevant person (whether on a personal, work, or other basis) is also an important factor to be considered in the fit and proper person assessment.
- d) Site owners may be required to provide details of any current or former associates of the relevant person in the application form. Those associates will not include other current joint owners as that information would have already needed to have been provided in their own application forms.
- e) It is not routinely required to provide information of all current or past associates of the site owner. However, prior to making any final decisions, the local authority will consider the conduct of past and current associates relevant to that individual's application. **The site owner can be asked to provide additional information during the application process.**
- f) Local authorities will be required to establish whether an individual is considered to be an associate of the relevant person and then whether their conduct is relevant to the application. A relevant associate could be defined as any individual who may have played a part, directly or indirectly, in a decision or action, which has had an impact on residents' rights, or the quiet enjoyment of their homes.
- g) The Regulations are drafted widely giving the opportunity for local authorities to take into consideration other relevant matters.
- h) Local authorities are able to decide the specific matters they deem relevant to the fit and proper person application. These matters could be in relation to current or previous issues, or events, that have occurred in relation to the park site or any other park site owned or managed by the site owner or site manager in another local authority area. Additionally, the site owner's conduct regarding other business, outside of the park homes sector, can also have implications on the financial and management arrangements of the site in question. Any matters which the local authority believe to be of relevance to the application will primarily focus on the relevant person's conduct, competence, and their suitability to manage the site.

Applications

The Regulations use various terms in the application process, and these are outlined below:

As mentioned earlier “Relevant person” is defined in paragraph 2 of the Regulations and is “the subject of the fit and proper person assessment under Regulation 7”. Please note that this could be the site owner or person appointed to manage the site by the site owner.

“Relevant officer” is defined in paragraph 1 of Schedule 2 of the Regulations, where the applicant is a company, a relevant officer will be a director or other officer of the company; or, where the applicant is a partnership, a partner; or, where the applicant is a body corporate, a member of the management committee of that body.

“Required Information” is defined in paragraph 14 of Schedule 2 of the Regulations (even though the Regulations incorrectly state that this information is contained in paragraph 13) as: the person’s name and business contact details; details of the person’s role or proposed role in relation to the management of the site; where the person has not yet been appointed, the address, telephone number and email address (if any) at which the person may be contacted in respect of the application; details of each relevant protected site (other than that to which the registration application relates) — for which the person holds a licence issued under section 3 of the Caravan Sites and Control of Development Act 1960, or in which the person has a legal estate or equitable interest, or which the person manages.

The application for inclusion in the fit and proper register, must therefore include the following:

a) Details of the site and the applicant:

- (1) The applicant’s name and business contact details.
- (2) Where the applicant is not an individual, the following information in relation to the individual completing the application on behalf of the applicant and each relevant officer:
 - (i) the person’s name.
 - (ii) details of the person’s role (if any) in relation to the management of the site.
- (3) The name and address of the site.
- (4) Evidence of the applicant’s legal estate or equitable interest in the site.
- (5) Confirmation that the applicant is the occupier within the meaning of section 1 of the Caravan Sites and Control of Development Act 1960.
- (6) The name and business contact details of any other person that has a legal estate or equitable interest in the site.

b) The name and address of each other relevant protected sites:

- (1) for which the applicant holds a licence issued under section 3 of the Caravan Sites and Control of Development Act 1960;
- (2) in which the applicant has a legal estate or equitable interest; or
- (3) that the applicant manages.

The applicant must clearly specify whether their application is made in respect of either the applicant, or site owner, or the person that the applicant or site owner has appointed to manage the site.

c) Information relating to the site manager

In circumstances where a “site manager” has been appointed to manage a site more information is needed. The person who is applying for the site manager to be registered as a fit and proper person (the relevant person) must provide the following information: the site manager’s name and details of that person’s role (if any) in relation to the management of the site.

If the site manager has appointed or intends to appoint a further individual (“A”), ‘required information’ would also be needed from A. Where A is not a relevant officer of the site manager, the relevant officer to whom A is accountable for the day-to-day management of the site, should be the one to provide the required information.

d) Additional information when the applicant is the relevant person and an individual

When the applicant is the relevant person, is an individual, and the applicant has appointed, or intends to appoint, someone else (“B”) to be responsible for the day-to-day management of the site, ‘required information’ would be needed from B. If B is not an individual but is, instead, for example, a company and B has appointed an individual (“C”) to do the day-to-day management, ‘required information’ would be needed from C. Where C is not a relevant officer of a company, the relevant officer to whom C is accountable for the day-to-day management of the site would also need to provide the required information.

e) Additional information where applicant is relevant person and not an individual

When the applicant is the relevant person but is not an individual and the applicant has appointed or intends to appoint someone else (“B”) to be responsible for the day-to-day management of the site, required information would be needed from this person. If B is not a Relevant officer of the applicant, the person to whom B is accountable for the day-to-day management of the site (“C”) would also need to provide the required information. Where B itself is not an individual, the individual (“D”) that B has appointed or intends to appoint to be responsible for the day-to-day management of the site would also need to provide the required information. Where D is not a relevant officer of B, the relevant officer to whom D is accountable for the day-to-day management of the site would also need to provide the required information.

It can be seen from the above that the Regulations prohibit the operation of a relevant protected site unless the site owner or its site manager (whatever the management structure might be) has been assessed by the local authority as a fit and proper person to do so. This has been included to ensure that consistent standards are applied to companies and other organisations that are not individuals.

f) Criminal record certificate/s

Criminal Records Certificates must be issued under section 113A (1) of the Police Act 1997 and will be required where: (a) the relevant person is an individual and (b) for each individual in relation to whom the applicant is required to provide information for example, a site manager or individuals A, B, C or D as outlined above.

The Criminal record may be either basic or enhanced, at the discretion of the local authority. Initially Cambridge City Council is accepting **basic criminal record checks** with the application. Where further information is deemed necessary, it is at the Council's discretion to carry out an enhanced Criminal Record check or to request this.

The certificate must have been issued no more than six months before the date of the application. It is incumbent upon the site owner to ensure that any certificates provided meet this requirement.

g) Declaration

A declaration made and signed by the "appropriate person", which means:

- (a) where the applicant is a company, a director or other officer of the company.
- (b) where the applicant is a partnership, one of the partners.
- (c) where the applicant is a body corporate and the conduct of the management of the body is vested in its members, a member.
- (d) where the applicant is not a body falling within (a) to (c) above, a member of the management committee.
- (e) where the applicant is an individual, that individual.

Where the applicant is not the relevant person, the declaration must confirm that the applicant has made all reasonable enquires into the matters mentioned in paragraph 9 of the Regulations and considerations relevant to the fit and proper person assessment as set out below.

The declaration should also state that the information provided in the application is correct and complete to the best of the applicant's knowledge and belief.

Assessment

Considerations relevant to fit and proper person assessment

Proper management of the site includes, but is not limited to, securing compliance with the site licence and the long-term maintenance of the site.

To be able to secure the proper management of the site, the local authority will (amongst other things) have regard to whether the relevant person has a sufficient level of competence to manage the site and the management structure or proposed management structure, and funding arrangements as mentioned earlier in the Policy.

Decisions, notification and rights of appeal

The local authority will make a decision on the application in a timely and practicable manner and either:

- (a) where the decision is to grant the application unconditionally and include the relevant person on the register for 5 years, serve a final decision notice on the applicant; or
- (b) otherwise, serve a preliminary decision notice on the applicant.

On receipt of an application the local authority may:

- (a) grant the application unconditionally.
- (b) grant the application subject to conditions; or
- (c) reject the application.

Granting the application unconditionally

Where the local authority is satisfied that the applicant meets the fit and proper person test unconditionally, they must include the applicant on the register for 5 years. The authority must issue a final decision notice to the applicant to inform them of its decision.

The final decision notice will clearly state:

- (a) the date the final decision notice is served
- (b) the final decision
- (c) the reasons for the decision
- (d) when the decision is to take effect
- (e) information about:
 - (i) the right of appeal to the First Tier Tribunal; and
 - (ii) the period within which an appeal may be made.

To include the applicant on the register subject to certain conditions

In some circumstances, the local authority will specify that the individual for the fit and proper person test will only be successful if certain conditions are met. If these conditions are satisfied, the local authority can grant an application subject to those condition(s). The local authority can also grant an application for less than 5 years.

It may be the case that a local authority decides to include the person on a register subject to condition(s), if it would only be satisfied that the person would meet the fit and proper requirement if the condition(s) were complied with. An applicant will be able to appeal against the decision to attach (or vary) any condition to an entry on the register. The local authority will have clear and justifiable reasons for attaching any condition(s) and any conditions imposed can be enforced by the local authority.

Conditions will need to be clearly stated for the applicant's understanding and this will also allow for local authorities to ensure that they are enforceable.

An example of the requirements are included in Table 1 below.

Table 1: Requirements of conditions

Specific	The specific condition(s) a site owner is being requested to address.
Measurable	The conditions required and the outcome(s) expected.
Achievable	The applicant should be reasonably expected to be able to achieve the condition. For example, it may not be reasonable to expect a site owner of one small site to have the same resources to introduce the same procedures as a medium sized company.
Realistic	The applicant should have a clear understanding of how the required outcome can be reached and that there are no circumstances or factors which would make the achievement of the outcome impossible or unlikely.
Timebound	A clear timescale in which the task/action must be completed.

The fit and proper person test is aimed at ensuring that the person managing the site is competent and the conditions should relate directly to the person's ability to secure the proper management of the site.

Where a person has contravened legislation, or committed offences, it is not recommended that conditions are set in relation to those matters. This is because such a condition would be unlikely to meet the tests set out above. For example, if a person has committed fraud or violence, that specific incident cannot be reversed by requiring the person to perform a specific task.

In cases where the person has committed those listed offences or contravened legislation, these breaches will be considered, together with all the other information available, when reaching a preliminary decision.

An example of a condition could relate to the payment of an annual fee. A condition can also be set with respect to ensuring the relevant person can secure the proper management of the site. In summary, conditions can relate to any factors which are relevant to the person's competence to manage the site, the management structure, or funding arrangements for the site, an associated person's influence, and any other relevant factors.

The payment of the annual fee for relevant sites will be a condition placed on all approvals by the local authority.

Decisions not to include the applicant on the register (Refusal)

Should the local authority determine that the applicant does not meet the requirements, and attaching conditions would not be appropriate, a local authority can refuse to grant the application.

Preliminary Decision Notice

Where a local authority decides to include the applicant on the register, subject to conditions, or not to include the applicant on the register, a preliminary decision notice to the applicant must be issued.

The preliminary decision notice must clearly state:

- (a) the date the preliminary decision notice is served.
- (b) the preliminary decision.
- (c) the reasons for it.
- (d) the date it is proposed that the final decision will have effect.
- (e) information about the right to make written representations.
- (f) where the preliminary decision is to refuse the application, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
- (g) where the preliminary decision is to grant the application subject to conditions, the consequences of failing to comply with any conditions.

Right to make a representation

An applicant who receives a preliminary decision notice will have 28 days in which to make representations to the local authority. The 28-day period begins with the day after the day on which the notice was served.

The local authority is obliged to consider and take any representations it receives into account before making a final decision.

Final decision notice

The local authority must, as soon as reasonably practicable, after the end of the period allowed for making representations, make a final decision and serve the decision notice on the applicant.

The final decision notice must set out:

- (a) the date the final decision notice is served.
- (b) the final decision.
- (c) the reasons for it.
- (d) when the decision is to take effect.
- (e) information about the right of appeal and the period within which an appeal may be made.
- (f) where the decision is to refuse the application, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
- (g) where the decision is to grant the application subject to conditions, the consequences of failing to comply with any condition.

Appeals

The applicant can decide to appeal the decision by making an application to the First-tier Tribunal (Property Chamber) ("the tribunal") within specific timeframes set by the tribunal. The applicant is permitted to appeal against any decisions served by the Local Authority. These could include:

- (a) including the relevant person on the register for an effective period of less than 5 years.
- (b) including the relevant person on the register subject to conditions; and
- (c) rejecting the application.

Where an applicant accepts a local authority's decision not to include the person originally stated in the application on the register, they will be required to seek alternative management arrangements to comply with the fit and proper person requirement. If they fail to do so they will be committing an offence.

An appellant will not be able to claim compensation for losses incurred pending the outcome of an appeal.

Withdrawal or amendment of notice

There may be circumstances where a local authority may decide not to continue or to withdraw a previously agreed action such as after serving:

- (a) a preliminary decision notice but before service of the final decision notice.
- (b) a final decision notice but before the decision to which it relates takes effect; or
- (c) a notice of proposed action but before the proposed action is taken.

To withdraw or amend a notice, the local authority must serve notice to the person on whom the original notice was served.

There are no requirements for notices to contain specific information, however, it is recommended that a withdrawal or amendment notice should state:

- (a) That it is withdrawing/amending the original notice (a copy of the original notice should be attached for reference).
- (b) the reasons for withdrawing the notice.

- (c) the date it takes effect; and,
- (d) the implications of the decisions in relation to the person's entry on the register.

Removal from the register

If, after a person is included in the register, and new evidence relevant to the person's inclusion becomes available, the local authority may decide to:

- (a) remove the person from the register.
- (b) impose a condition on the inclusion of the person in the register whether, or not there are conditions already imposed.
- (c) vary a condition; or
- (d) remove a condition.

Local authorities must use their judgement when determining whether to review an entry and consider any subsequent actions are required. It is recommended that any such decision should be related to the person being a fit and proper person rather than, for example, site licensing issues which are governed separately. If the local authority decides to take any of the actions listed in the paragraph above, the local authority must serve a notice of any proposed action on the occupier.

The notice of proposed action must clearly state:

- (a) the date the notice of proposed action is served.
- (b) the action the local authority proposes to take.
- (c) the reasons for it.
- (d) the date it is proposed that the local authority will take the action
- (e) information about the right to make written representations.
- (f) where the proposed action requires the removal of a person from the register, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of the regulations; and
- (g) where the proposed action is to impose a condition on the inclusion of a person in the register or to vary a condition, the consequences of failing to comply with said conditions.

A notice of proposed action is not required if the local authority decides to remove a condition attached to an entry. A removal of a condition is viewed widely as being a positive step, which

is unlikely to be opposed. It is for that reason that a notice of proposed action is not required. As good practice though, the local authority will make the site owner or their manager aware of the decision in writing and also ensure the register is updated.

Notice of action taken

Where a notice of proposed action is given, the occupier will have 28 days, starting from the day after the notice is served, in which to make representations.

The local authority must, as soon as reasonably practicable after the end of the 28-day period, decide whether to carry out the proposed action.

Where the local authority decides to take the action, the local authority must serve a further notice on the occupier, indicating the action that has been taken, within the period of 5 working days beginning with the day after the day on which the action was taken.

The notice of action must set out:

- (a) the date the notice of action is served.
- (b) the fact that they have taken the action.
- (c) the reasons for doing so.
- (d) the date the action was taken.
- (e) information about the right of appeal and the period within which an appeal may be made.
- (f) where the action is to remove a person from the register, the consequences of causing or permitting the land to be used as a relevant protected site in contravention of regulations; and
- (g) where the action is to impose a condition on the inclusion of a person in the register or to vary a condition, the consequences of failing to comply with any condition.

Offences

There are 3 offences which can occur within the Regulations. They are as follows:

- a) Operating a site in contravention of the fit and proper person regulations - The site owner will have certain defences under the Regulations in any proceedings brought against them.

- b) Withholding information or including false or misleading information in the registration application - The site owner will not have any defences under the Regulations in any proceedings brought against them for this offence.
- c) Failing to comply with a specified condition - The site owner will have certain defences under the Regulations in any proceedings brought against them.

Local authorities are responsible for enforcing the regulations. A site owner found guilty of any of the above offences will be liable on summary conviction to a level 5 (unlimited) fine.

Defences

One defence is available to a site owner who has inherited a site and would be found to have a reasonable excuse for failing to make an application within the relevant periods as set out below.

Table 2 below outlines limited circumstances where a site owner may have a defence:

Table 2 - Relevant periods in specific circumstances

Row	Circumstance	Relevant period for making an application in the circumstance
1	the occupier held a site licence immediately before the day on which regulation 4 (operating a site without being a fit and proper person) came into force on 1 October 2021.	From 1 st July 2021 before 1 October 2021; the day on which regulation 4 came into force
2	the period of a person's inclusion in the register in relation to the site has come to an end other than as a result of action by the local authority under regulation 8(1)(a); removal from the fit and proper register after new relevant evidence becomes available.	not less than two months before the end of the period of the person's inclusion in the register
3	at the time that the occupier became entitled to within the period of 3 months possession of the land it was in use as a relevant protected site; and within the period of 28 days beginning with the day after the day on which the person became the occupier of the land the occupier notifies the relevant local authority of its intention to make an application under regulation 6 (application for inclusion in the register)	beginning with the day after the day on which the person became the occupier of the land
4	at the time that the occupier became entitled to possession of the land it was in use as a relevant protected site; and the occupier does not give the notification referred to in row 3 above	within the period of 28 days beginning with the day after the day on which the person became the occupier of the land

5	a person appointed to manage the site no longer does so; and within the period of 28 days beginning with the day after the relevant day the occupier notifies the relevant local authority that the person no longer does so	within the period of 3 months beginning with the day after the relevant day
6	a person appointed to manage the site no longer does so; and the occupier does not give the notification referred to in row 5 above	within the period of 28 days beginning with the day after the relevant day
7	the breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has removed a person from the register; and within the period of 28 days beginning with the relevant day in relation to the local authority's decision the occupier notifies the relevant local authority of its intention to make a new application under regulation 6 (application for inclusion in the register) in relation to the site	within the period of 3 months beginning with the relevant day
8	the breach of regulation 4(1) arises because the local authority has removed a person from the register; and the occupier does not give the notification referred to in row 7 above	within the period of 28 days beginning with the relevant day
9	the breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has rejected an in-time application; and within the period of 28 days beginning with the relevant day in relation to the rejected application the occupier notifies the relevant local authority of its intention to make a new application under regulation 6	within the period of 3 months beginning with the relevant day
10	the breach of regulation 4(1) (operating a site without being a fit and proper person) arises because the local authority has rejected an in-time application; and the occupier does not give the notification referred to in row 9 above	within the period of 28 days beginning with the relevant day

The Fit and Proper Persons Register

The local authority must set up and maintain a register of persons who they are satisfied are fit and proper persons to manage a site in their area. This register must be open to inspection by the public during normal office hours. This register also must be published online and will be made available on the Council's website.

The register will provide a record of the outcome of the fit and proper person tests the local authority have carried out for sites. The register must include the following:

- (a) the name and business contact details of the person.
- (b) the name and address of the relevant protected site to which the application relates.
- (c) the status of the person (site owner or manager of the site).
- (d) the dates of the first and last day of the period for which the person's inclusion in the register has effect.
- (e) whether any condition is attached to the person's inclusion in the register; and
- (f) where any condition is attached to the person's inclusion in the register—

- (i) the number of any such conditions.
- (ii) the dates of the first and last day of the period for which any such condition applies (if applicable); and
- (iii) the date any condition is varied or satisfied (if applicable).

Where a person has met the fit and proper person test, the register will give details of that person and of the site, including decisions made on how long a person's inclusion is for, up to a maximum of 5 years.

In order to comply with the fit and proper person requirement a site owner must at least two months before the period (e.g. 5 years) comes to an end submit a new application for the person (or alternative) to be included in the register.

Where there are rejected applications, the following information must be included in the register:

- (a) the name and address of the site to which the application relates.
- (b) that an application in respect of the site has been rejected; and
- (c) the date on which the application was rejected.

Details of the rejected application will remain on the register until a successful fit and proper person application is made in respect of the owner or manager of the site.

It must be noted that the name of the rejected applicant will not be included on the register. The local authority will be able to consider requests for further information about the entry on the register, for example, the details of the specific conditions attached and any additional information, on a case-by-case basis and in accordance with data protection legislation.

Where the local authority has, with the site owner's consent, appointed a person to manage the site, the local authority must include the following information:

- (a) the name and business contact details of the person.
- (b) the name and address of the site which the person has been appointed to Manage.
- (c) the status of the person.
- (d) the dates of the first and last day of the period for which the person's inclusion in the register has effect.
- (e) whether any condition is attached to the person's inclusion in the register; and
- (f) where any condition is attached to the person's inclusion in the register:
 - (i) the number of any such conditions.
 - (ii) the dates of the first and last day of the period for which any such condition applies (if applicable); and
 - (iii) the date any condition is varied or satisfied (if applicable).

The regulations permit the Local Authority to determine the fee for an application or registration for someone to be added to the register. Site owners will be required to submit a completed application and pay the fee outlined within **Appendix 2**. It is imperative that the fee is included with the application and failing to include this may mean that the site owner

is in breach of the requirements of the regulations. CCC is not required to consider an application for entry on the register unless that application is accompanied by the correct fee. If the correct fee is not paid, the application will not be valid.

The person on whom the Local Authority serves a final decision notice may appeal to the First Tier Property Chamber against any decision to:

- Include the relevant person on the register for an effective period of less than 5 years
- Include the relevant person on the register subject to conditions
- Reject the application

If the site owner decides to appeal the decision, they must make an application to this First Tier Tribunal in line with timeframes set by the tribunal at the time.

5.0 Fees for licence, annual inspection and fit & proper person register applications

Before a Local Authority can charge a fee, it must prepare and publish a fees policy. When fixing a fee, the Local Authority:

- Must act in accordance with its fees policy.
- May fix different fees in different cases.
- May determine that no fee is required in some cases.

Any fees charged must fairly cover the costs (or part of the costs) incurred by the Local Authority in performing its functions under Part 1 of the MHA 2013 (excluding the costs of enforcement action or any functions relating to prohibiting caravans on commons or provision of sites by the Local Authority itself). In setting its fees policy and the fees to be charged, CCC has had regard to Department for Communities and Local Government guidance "Mobile Homes Act 2013: a Guide for Local Authorities on Setting Licensing Fees".

Under the MHA2013, the Council can charge for:

- The issuing of the first site licence.
- Generic fees for all sites for the issuing of the licence.
- Annual renewal: monitoring and administration of existing site licences.
- The depositing of site rules.
- The transfer of a licence.
- The alteration of a licence (initiated by the site owner).
- The inclusion of a relevant person to the Fit and Proper Person register.

The fees detailed within this policy have been calculated based on the estimated average time and costs involved in undertaking the following activities: all administrative costs incurred in the licensing process, officer visits to sites, travel costs, consultations, meetings, monitoring of sites/investigation of complaints and the giving of informal advice.

Section 10A (5) of the CSCDA 1960 (as amended by the MHA 2013) states that a fee policy must include provision about the time at which the annual fee is payable. For the purposes of this policy, the period covered by the annual fee will be 1 April to 31 March and will be invoiced on 1 April each year or as soon as practicable after.

The purpose of publishing the fee policy is to show that the fees imposed by the Local Authority are fair and transparent so that anyone required to pay a fee can understand the charges.

Fit & Proper Person Register Application fee

CCC has provided a breakdown of tasks associated with the Fit and Proper Person assessment and/or checks to be included on the Fit and Proper Person register within Appendix 2.

The Local Authority has considered the following matters on which costs are incurred, or likely to be incurred, when determining its fees for consideration of applications for entry on a Fit and Proper Person register:

- Initial enquiries
- Communications required to make appointments and request any documents or other information from the site owner or from any third party in connection with the Fit and Proper Person process
- Sending out forms/processing application forms
- Updating files, computer systems and the website
- Processing the application fee
- Land Registry searches
- Time for reviewing necessary documents and certificates
- Preparing preliminary and final decision notices
- Reviewing any representations made by applicants or responses from third parties
- Carrying out any risk assessment process considered necessary
- Updating the public register
- Reviews of decisions or in defending appeals

The charges are limited to recovering the costs of exercising the Fit and Proper Person test function only and do not include other costs that have already been charged for by other service areas.

New site licensing fee and annual site inspection fee

All sites must pay a new site licensing fee which must accompany their application for a caravan site licence from the Council.

All sites must subsequently pay an annual site inspection fee to CCC (subject to exemptions). This fee covers the costs associated with administration, annual inspection and a revisit to ensure compliance where required. The annual fee is a fixed cost based on a hypothetical case of moderate complexity in terms of potential for grant / transfer of a licence and associated probable variation in the cost of processing a licence renewal according to the size of the site. The cost of an amendment to site licence conditions is included within this annual fee as is the cost for transfer of a licence.

Single unit sites where the operator is also the owner and occupier of the park home will be exempt from annual fees.

Appendix 2 details the full breakdown of the costs associated with each caravan site fee. PLEASE NOTE - The fees set for 2022 / 23 are displayed within the tables however these will be reviewed annually via the fees & charges budget process taking into account any changes to the Council's chargeout rates.

Any revisions by CCC of this fee policy will be published on the Council's website. Any changes will be justifiable and reasonable, ensuring full transparency for the site owners.

Appendix 2 – Calculation of Fees, (tables displaying 2022/23 fees & charges)

Methodology

The calculation relating to the setting of fees involves cost matrixes as displayed below that break down the amount of time taken at various stages of the process. The calculations were carried out with reference to 'The Mobile Homes Act 2013 - A Guide for Local Authorities' on setting site licence fees.

The fee structure was devised to be fair, transparent and an accurate reflection of reasonable costs for the Council to administer the process. A summary of the calculated costs are as follows:

New site licence fee

Officer	Actions	Time (hours)	Hourly rate (£)	Cost (£)
	New Licence Application			
STO	letter writing/ telephone calls etc to make appointments and requesting any documents or other information from the site owner or from any third party in connection with the licensing process	0.5	64	32
STO	sending out forms	0.1	64	6.4
STO	<i>An inspection of the site, at planning stage or on immediate planning approval, to discuss requirements with site owner;</i>	0.5	64	32
STO	<i>preparing reports on contraventions</i>	0.5	64	32
STO	<i>downloading photographs</i>	0.1	64	6.4
STO	<i>A second visit, following the issue of a new licence, to check conditions and occupation of site.</i>	0.5	64	32
STO	<i>carrying out risk assessment of site and management</i>	0.5	64	32
STO	pre- application advice	0.2	64	12.8
STO	updating hard files/ computer systems;	0.2	64	12.8
STO	processing the licensing fee	0.2	64	12.8
STO	land registry searches;	0.1	64	6.4
STO	time for reviewing necessary documents and certificates	0.5	64	32
STO	preparing draft and final licences	0.5	64	32
STO	updating public register	0.1	64	6.4
STO	reviews of decisions by manager and/or legal department	0.5	64	32
		Total costs =		320

Annual inspection fee

[illegible]

Fit and Proper Person Register Application Fee – 5 Yearly

CALCULATION OF FEE FOR FIT AND PROPER PERSON APPLICATION	Officer's level	Hourly Rate £ including overheads	Average No of hrs taken	Total Sum
1) Initial Enquiries	STO	64	0.25	16.00
2) Letter writing, Telephone calls to make appointments and requesting any documents or other information from the site owner or from a third party in connection with the fit and proper process	STO	64	0.5	32.00
3) Sending out forms	STO	64	0.25	16.00
4) Updating files/Computer systems and websites	STO	64	0.25	16.00
5) Processing the application fee	STO	64	0.25	16.00
6) Land Registry Searches	STO	64	0.5	32.00
7) Reviewing necessary documents and certificates	STO	64	0.5	32.00
8) Preparing preliminary and final decision notices	STO	64	1.25	80.00
9) Review by manager or lawyers: review any representations made by applicants or responses from third parties	STO	64	0.25	16.00
10) Updating the public register	STO	64	0.25	16.00
11) Carrying out any risk assessment process considered necessary	STO	64	0.5	32.00
12) Reviews of decisions or in defending appeals	STO	64	1.25	80.00
TOTAL SUM				384.00

Model Standards 2008 for Caravan Sites in England
Caravan Sites and Control of Development Act 1960 – Section 5





Model Standards 2008 for Caravan Sites in England **Caravan Sites and Control of Development Act 1960 – Section 5**

April 2008
Department for Communities and Local Government: London

Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU
Telephone: 020 7944 4400
Website: www.communities.gov.uk

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PO Box 236
Wetherby
West Yorkshire
LS23 7NB
Tel: 08701 226 236
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Introduction

1. Under section 5(6) of the Caravan Sites and Control of Development Act 1960 (the Act) the Secretary of State may from time to time specify model standards with respect to the lay-out and the provision of facilities, services and equipment for caravan sites or particular types of caravan site; and that, in deciding what (if any) conditions to attach to a site licence, the local authority shall have regard to any standards so specified.
2. These standards only apply to those sites which contain caravans that are used as permanent residential units. They do not apply to sites used exclusively for holidays or touring caravan sites (for which separate model standards have been issued). The standards also do not apply to sites occupied by gypsies or travellers or caravan sites which house agricultural workers.
3. These standards should be considered when applying licence conditions to new sites and sites that have been substantially redeveloped. In considering variations to existing site licences or applications for new site licences for existing sites local authorities should consider whether it is appropriate for these standards to apply. In relation to variation of a licence the local authority must consult the site licence holder on its proposed variations and may wish to consult with residents or a Residents' Association, where appropriate. Where a current licence condition is adequate in serving its purpose, the authority should not normally apply the new standard. Where it is appropriate to apply the new standard to a condition the local authority should be able to justify its reasons for doing so, having regard to all the relevant circumstances of the site. In deciding whether to apply a new standard the local authority must have regard to the benefit that the standard will achieve and the interests of both residents and site owners (including the cost of complying with the new or altered condition).
4. The model standards represent those standards normally to be expected as a matter of good practice on caravan sites. They should be applied with due regard to the particular circumstances of the relevant site, including its physical character, any relevant services, facilities or other amenities that are available within or in the locality of the site and other applicable conditions.
5. The annex to this document provides advice on the application and enforcement of the model standards when considering attaching conditions to licences.

6. In the model standards any references to “site” includes a park home site (including a mobile home site) and to “caravan” includes a mobile or park home.
7. This document should be referred to as Model Standards 2008 for Caravan Sites in England.

Previous Standards

8. The 2008 Standards replace the document “Model Standards 1989: Permanent Residential Mobile Homes Sites”. When issuing any new licences or reviewing current ones the local authority must have regard to the 2008 Standards in setting or varying any of the conditions attached.

THE STANDARDS

1. The Boundaries and Plan of the Site

- (i) The boundaries of the site from any adjoining land shall be clearly marked by a man made or natural feature.
- (ii) No caravan or combustible structure shall be positioned within 3 metres of the boundary of the site.
- (iii) (a) A plan of the site shall be supplied to the local authority upon the application for a licence and, thereafter whenever there is a material change to the boundaries or layout of the site, or at any other time on the demand of the local authority.
- (b) The plan supplied must clearly illustrate the layout of the site including all relevant structures, features and facilities on it and shall be of suitable quality.

2. Density, Spacing and Parking Between Caravans

- (i) Except in the case mentioned in sub paragraph (iii) and subject to sub paragraph (iv), every caravan must where practicable be spaced at a distance of no less than 6 metres (the separation distance) from any other caravan which is occupied as a separate residence.
- (ii) No caravan shall be stationed within 2 metres of any road or communal car park within the site or more than 50 metres from such a road within the site.
- (iii) Where a caravan has retrospectively been fitted with cladding from Class 1 fire rated materials to its facing walls, then the separation distance between it and an adjacent caravan may be reduced to a minimum of 5.25 metres.
- (iv) In any case mentioned in subparagraph (i) or (iii):
 - (a) A porch attached to the caravan may protrude one metre into the separation distance and must not exceed 2 metres in length and 1 metre in depth. The porch must not exceed the height of the caravan. Where a porch is installed only one door may be permitted at that entrance to the home, either on the porch or on the home.

- (b) Eaves, drainpipes and bay windows may extend into the separation distance provided the total distance between the extremities of two facing caravans is not less than 5 metres, except where sub paragraph (iii) applies in which case the extension into the separation distance shall not exceed 4.25 metres.
- (c) Any structure including steps, ramps, etc (except a garage or car port), which extends more than 1 metre into the separation distance shall be of non-combustible construction. There should be a 4.5 metre clear distance between any such structure and any adjacent caravan.
- (d) A garage or car port may only be permitted within the separation distance if it is of non-combustible construction.
- (e) Windows in structures within the separation distance shall not face towards the caravan on either side.
- (f) Fences and hedges, where allowed and forming the boundary between adjacent caravans, should be a maximum of 1 metre high.
- (g) Private cars may be parked within the separation distance provided that they do not obstruct entrances to caravans or access around them and they are a minimum of 3 metres from an adjacent caravan.
- (v) The density of caravans on a site shall be determined in accordance with relevant health and safety standards and fire risk assessments.

3. Roads, Gateways and Overhead Cables

- (i) Roads shall be designed to provide adequate access for emergency vehicles and routes within the site for such vehicles must be kept clear of obstruction at all times.
- (ii) New roads shall be constructed and laid of suitable bitumen macadem or concrete with a suitable compacted base.
- (iii) All roads shall have adequate surface water/storm drainage.
- (iv) New two way roads shall not be less than 3.7 metres wide, or if they are designed for and used by one way traffic, not less than 3 metres wide.
- (v) One-way systems shall be clearly signposted.
- (vi) Where existing two way roads are not 3.7 metres wide, passing places shall be provided where practical.
- (vii) Vehicular access and all gateways to the site must be a minimum of 3.1 metres wide and have a minimum height clearance of 3.7 metres.

- (viii) Roads shall be maintained in a good condition.
- (ix) Cable overhangs must meet the statutory requirements.

4. Footpaths and Pavements

- (i) Every caravan shall be connected to a road by a footpath with a hard surface which shall be maintained in good condition.
- (ii) Where practicable, communal footpaths and pavements shall not be less than 0.9 metres wide.

5. Lighting

Roads, communal footpaths and pavements shall be adequately lit between dusk and dawn to allow the safe movement of pedestrians and vehicles around the site during the hours of darkness.

6. Bases

- (i) Every unit must stand on a concrete base or hard-standing.
- (ii) The base must extend over the whole area occupied by the unit, and must project a sufficient distance outwards from its entrance or entrances to enable occupants to enter and leave safely. The hard standings must be constructed to the industry guidance, current at the time of siting, taking into account local conditions.

7. Maintenance of Common Areas, including Grass, Vegetation and Trees

- (i) Every part of the site to which the public have access shall be kept in a clean and tidy condition.
- (ii) Every road, communal footpath and pavement on the site shall be maintained in a good condition, good repair and clear of rubbish.
- (iii) Grass and vegetation shall be cut and removed at frequent and regular intervals.
- (iv) Trees within the site shall (subject to the necessary consents) be maintained.
- (v) Any cuttings, litter or waste shall be removed from the immediate surrounds of a pitch.

8. Supply & Storage of Gas etc

- (i) Gas (including natural gas) and oil installations, and the storage of supplies shall meet current statutory requirements, relevant Standards and Codes of Practice.
- (ii) Liquefied Petroleum Gas cylinders must not be positioned or secured in such a way as to impede access or removal in the event of an emergency.

9. Electrical Installations

- (i) On the site there shall be installed an electricity network of adequate capacity to meet safely all reasonable demands of the caravans and other facilities and services within it.
- (ii) The electrical network installations shall be subject to regulation under current relevant legislation and must be designed, installed, tested, inspected and maintained in accordance with the provisions of the current relevant statutory requirements.
- (iii) Any work on electrical installations and appliances shall be carried out only by persons who are competent to do the particular type of work being undertaken, in accordance with current relevant statutory requirements.
- (iv) Any work on the electrical network within the site shall be done by a competent person fully conversant with the appropriate statutory requirements.

10. Water Supply

- (i) All pitches on the site shall be provided with a water supply sufficient in all respects to meet all reasonable demands of the caravans situated on them.
- (ii) All new water supplies shall be in accordance with all current legislation, regulations and relevant British or European Standards.
- (iii) All repairs and improvements to water supplies and installations shall be carried out to conform with current legislation and British or European Standards.
- (iv) Work on water supplies and installations shall be carried out only by persons who are qualified in the particular type of work being undertaken and in accordance with current relevant legislation and British or European Standards.

11. Drainage and Sanitation

- (i) Surface water drainage shall be provided where appropriate to avoid standing pools of water.
- (ii) There shall be satisfactory provision for foul and waste water drainage either by connection to a public sewer or sewage treatment works or by discharge to a properly constructed septic tank or cesspool approved by the local authority.
- (iii) All drainage and sanitation provision shall be in accordance with all current legislation and British or European Standards.
- (iv) Work on drains and sewers shall be carried out only by persons who are qualified in the particular type of work being undertaken and in accordance with current legislation and British or European standards.

12. Domestic Refuse Storage & Disposal

- (i) Where communal refuse bins are provided these shall be non-combustible and housed within a properly constructed bin store.
- (ii) All refuse disposal shall be in accordance with all current legislation and regulations.

13. Communal Vehicular Parking

Suitably surfaced parking spaces shall be provided to meet the requirements of residents and their visitors.

14. Communal Recreation Space

On sites where it is practical to do so, suitable space equivalent to about one tenth of the total area of the site shall be allocated for recreational purposes, unless in the local authority's opinion there are adequate recreational facilities within a close proximity to the site.

15. Notices and Information

- (i) The name of the site shall be displayed on a sign in a prominent position at the entrances to the site together with the current name, address and telephone number of the licence holder and manager and emergency contact details, a copy of the site licence or the front page of the said licence and details of where the full licence and other information required to be available under this standard can be viewed and between which times (if not displayed on the notice board).

- (ii) A current plan of the site with roads and pitches marked on it shall be prominently displayed at the entrances to it.
- (iii) A copy of the current site licence shall be available for inspection in a prominent place on the site.
- (iv) In addition at the prominent place the following information shall also be available for inspection at the prominent place:
 - (a) A copy of the most recent periodic electrical inspection report.
 - (b) A copy of the site owner's certificate of public liability insurance.
 - (c) A copy of the local flood warning system and evacuation procedures, if appropriate.
 - (d) A copy of the fire risk assessment made for the site.
- (v) All notices shall be suitably protected from the weather and from direct sunlight.

16. Flooding

- (i) The site owner shall establish whether the site is at risk from flooding by referring to the Environment Agency's Flood Map.
- (ii) Where there is risk from flooding the site owner shall consult the Environment Agency for advice on the likelihood of flooding, the depths and velocities that might be expected, the availability of a warning service and on what appropriate measures to take.

17. Requirement to Comply with the Regulatory Reform (Fire Safety) Order 2005

The site owner shall make available the latest version of the fire risk assessment carried out under the Regulatory Reform (Fire Safety) Order 2005 for inspection by residents and when demanded, a copy of the risk assessment shall be made available to the local authority.

18. Fire safety measures where the Regulatory Reform (Fire Safety) Order 2005 does not apply (such as single unit sites and those sites solely occupied by family groups)

- (i) The standards in this paragraph only apply if the site is **not** subject to the Regulatory Reform (Fire Safety) Order 2005.

Fire Points

- (ii) These shall be located so that no caravan or site building is more than 30 metres from a fire point. Equipment provided at a fire point shall be housed in a weather-proof structure, easily accessible and clearly and conspicuously marked "FIRE POINT".

Fire Fighting Equipment

- (iii) Where water standpipes are provided:
 - (a) The water supply shall be of sufficient pressure to project a jet of water not less than 5 metres from the nozzle.
 - (b) There shall be a reel that complies with the current British or European Standard, with a hose not less than 35 metres long, having a means of connection to a water standpipe (preferably a screw thread connection) with a water supply of sufficient pressure and terminating in a small hand nozzle.
 - (c) Hoses shall be housed in a red box and marked "HOSE REEL". Access to the fire point shall not be obstructed or obscured.
- (iv) Where hydrants are provided, hydrants shall conform to the current British or European Standard.
- (v) Access to hydrants and other water supplies shall not be obstructed or obscured.
- (vi) Where standpipes are not provided or the water pressure or flow is not sufficient, each fire point shall be provided with water extinguishers (2 x 9 litres) which comply with the current British or European Standard.

Fire Warning

- (vii) A suitable means of raising the alarm in the event of a fire shall be provided at each fire point.

Maintenance and Testing of Fire Fighting Equipment

- (viii) All alarm and fire fighting equipment shall be installed, tested and maintained in working order by persons who are qualified in the particular type of work being undertaken and be available for inspection by, or on behalf of, the licensing authority or the Fire and Rescue Service.

- (ix) A record shall be kept of all testing and remedial action taken.
- (x) All equipment susceptible to damage by frost shall be suitably protected.

Fire Notices

- (xi) A clearly written and conspicuous notice shall be provided and maintained at each fire point to indicate the action to be taken in case of fire. This notice should include the following:

“On discovering a fire:

- I. Ensure the caravan or site building involved is evacuated.
- II. Raise the alarm.
- III. Call the fire brigade (the nearest phone is sited at).”

Annex to Model Standards 2008 for Caravan Sites in England: Explanatory Notes

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Preface

1. These explanatory notes are designed to be read in conjunction with Model Standards 2008 for Caravan Sites in England (“the Standards”) and are intended to offer guidance on the application and enforcement of the standards for local authorities.
2. The standards are a revision and modernisation of the 1989 standards, incorporating a number of new requirements, particularly in relation to maintenance of sites and flood protection measures, other standards have been modified and the standard relating to telephones has been deleted. The standards also take account of the effect of the Regulatory Reform (Fire Safety) Order 2005.
3. These standards do not apply to sites used exclusively for siting holiday or touring caravans. However, the standards apply to holiday sites containing permanent residential caravans (except those holiday sites where the only permanent residents are the site owner and members of his family and/ or his employees who are employed on the site and occupy the caravan pursuant to their contract of employment). The standards should be applied with due regard to the particular circumstance of the site to which they are intended to apply, including its physical characteristics, size, density, layout, amenities and services. See also paragraph 3 of the Standards document for further advice on the application of the standards.
4. In this document the term “site owner” is referred to throughout, as normally that person would be the licence holder.

Legal background

5. The use of land as caravan sites is controlled by relevant planning legislation, whereas the physical standards and layout, amenities and other standards are controlled by a site licence issued under the Caravan Sites and Control of Development Act 1960 (“the Act”). Section 5 of the Act enables local authorities to set licence conditions.
6. Under the Act, most privately owned sites must be licensed by the local authority, unless exempted under the Act¹. A licence will be granted unless the applicant does not have relevant planning permission to operate the site or has had a licence revoked in the last three years.²

¹ Section 2 and Schedule 1 to the Act set out in which circumstances a site licence is not required.

² Section 3 (4) and (6).

7. The local authority may attach conditions to the licence, but these can only relate to the physical use of the site and its management³. The Secretary of State may issue Model Standards which the local authority must have regard to in deciding what conditions to attach to a licence⁴. The authority may from time to time alter a site licence condition (either of its own volition or upon the application of the licence holder)⁵.
8. A licence holder may appeal against the imposition of a condition in a licence or any proposed alteration to a condition or a refusal to alter a condition⁶.
9. It is an offence to breach a licence condition and on summary conviction the offender can currently be fined up to £2,500⁷. Where a condition requires works to the site to be carried out and these are not done either within the time specified or to satisfaction of the local authority, the authority may carry out the works itself and recover from the licence holder any expenses it has reasonably incurred in doing so⁸.
10. The local authority may apply to the court to have a licence revoked if the licence holder has been convicted on two or more occasions of breaches of licence conditions⁹.
11. The local authority is required, under Section 25 of the Act, to maintain an accurate register of the site licences in their area. Given the number of different types of sites that local authorities may deal with, it is recommended that the register shows what type of site each is, be it holiday, residential, mixed use or gypsy and traveller. It is recommended as a minimum the information the site register has is:
 - Name and address of site (if available the Geographic Information Service mapping code should also be logged)
 - Name of the licence holder, the site owner (if different) and any person managing the site on behalf of either of those persons
 - Type of site
 - The number of pitches
 - The licence conditions (if any)

³ Section 5 (1) to (5). For restriction see *Mixnam's Properties v Chertsey UDC A.C.* 735.

⁴ Section 5 (6).

⁵ Section 8.

⁶ Sections 7 and 8 (2).

⁷ Section 9 (1). The maximum penalty on summary conviction is a fine not exceeding level 4 on the standard scale.

⁸ Section 9 (3).

⁹ Section 9 (2).

MODEL STANDARDS – EXPLANATORY NOTES

Introduction

12. The Model Standards 2008 for Caravan Sites in England have been made under powers conferred on the Secretary of State under section 5(6) of the Caravan Sites & Control of Development Act 1960 (the Act). A local authority must have regard to the standards when it imposes conditions in a site licence.
13. The standards do not apply to sites used solely for caravan holiday homes (although they do apply to mixed residential/ holiday sites), touring caravans or to sites occupied by gypsies and travellers or agricultural workers. The standards as laid out represent what would normally be expected as a matter of good practice on such sites. They should be applied with due regard to the particular circumstances of each case, including the physical character of the site, any facilities or services that may already be available within convenient reach and other local conditions.
14. The local authority must apply the Model Standards with regard to the particular characteristics of the site to which they are intended to apply, and in particular its existing layout and size. It is recognised that not all sites will easily be able to meet the Model Standards in every case due to their particular characteristics, but a local authority will need to be able to justify any decision not to have regard to a standard in setting a licence condition.
15. The standards are not intended to be the “ideal”; local authorities may in the circumstances set more demanding ones if that can be justified.
16. There will be some licence conditions which require inter and cross agency input and advice from other teams within the local authority and outside organisations, such as the Health and Safety Executive, the local Fire and Rescue Service and the Environment Agency. It is important for all parties concerned with sites that effective lines of communication are established to ensure that any problems are identified and resolved as early as possible.
17. Disability Discrimination legislation applies to sites and this should be borne in mind when framing licence conditions and considering possible enforcement action. Guidance can be found at www.dwp.gov.uk and this can also help local authorities in their consideration of licence conditions. Further guidance can also be found on the Equality and Rights Commission website at www.equalityhumanrights.com.

Enforcement

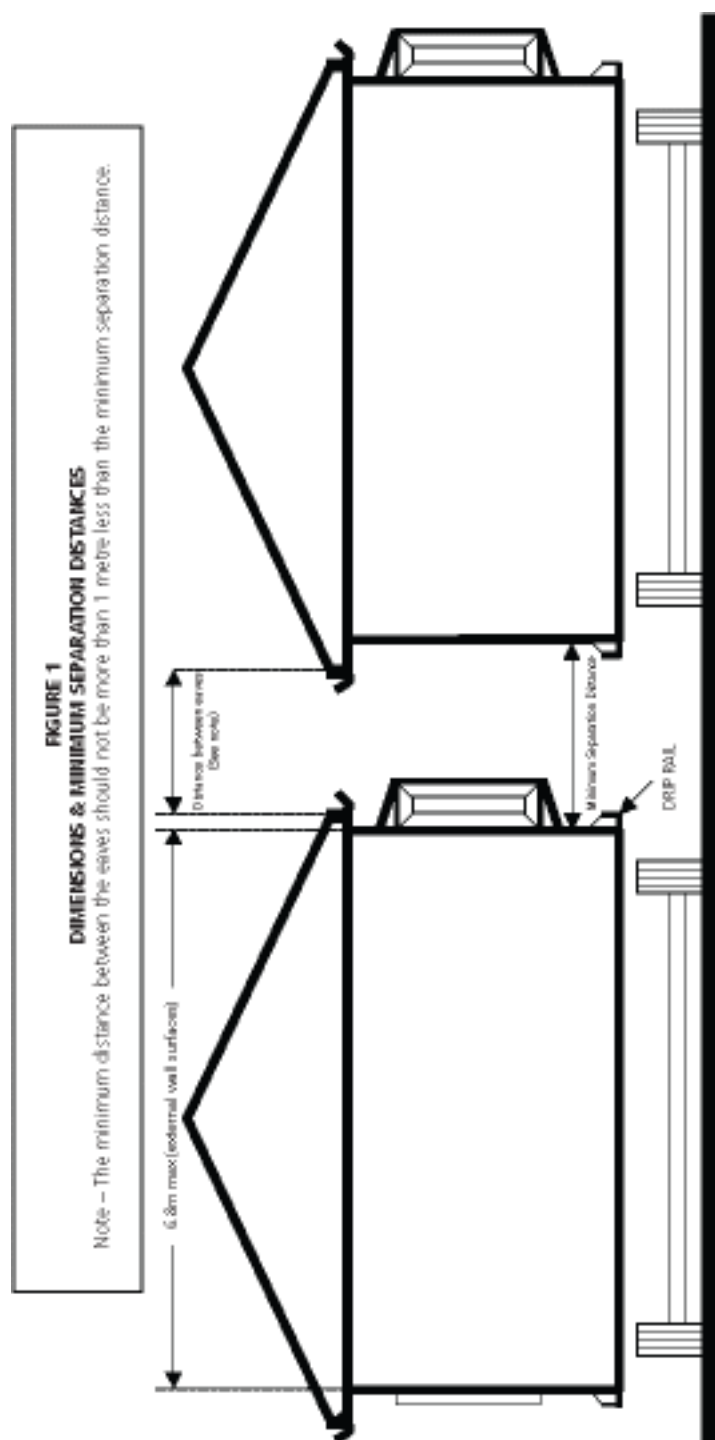
18. Any decision to enforce a licence condition should be taken in line with the Compliance Code (ISBN: 978-0-85605-712-0) which came into force in April 2008, for which comprehensive guidance is available on the Department for Business, Enterprise and Regulatory Reform website, www.bre.berr.gov.uk.
19. Local authorities should allow a reasonable period of time after any site licence alteration for compliance with the revised conditions, unless the reason for making the alteration was to address a matter requiring immediate attention.
20. When considering taking enforcement action local authorities should undertake a risk assessment to take into account all possible factors in relation to the prosecution.

The Boundaries and Plan of the Site

21. The boundary should clearly define the limit of the site owner's responsibility. The boundary should be suitably marked and properly maintained. This boundary could be formed of a fence, hedge, wall or natural feature or any other suitable structure (or any combination of these) or it may in whole, or part, be formed by an appropriate natural feature, such as a river or a wood. It would not normally be appropriate for that natural feature to simply include an open field.
22. Plans of the site shall be provided to the local authority at the site owners' expense.
23. It is best practice for copies of the plan to be made available to the emergency services.
24. The 3 metre separation distance inside the boundary serves the purpose of ensuring privacy from whatever is on the other side of the boundary, such as a road, and other developments, such as houses etc.
25. The 3 metre separation distance measurement should be taken from the caravan wall.

Density, Spacing and Parking Between Caravans

26. The 6 metre separation distance is required for two reasons:
- Health and safety considerations; and
 - Privacy from neighbouring caravans.
27. A diagram explaining the separation distances is attached below.



28. If a caravan has been fitted with cladding from class 1 fire rated materials, then the distance between units may be reduced. However, there is a need for the privacy of residents to be taken into consideration. Health and safety matters, such as the positioning of gas bottles, etc. will also need to be taken into account.
29. For the purposes of calculating the distance between the caravans, the point from which measurements are taken is the exterior cladding of the relevant caravan. Eaves, drainpipes, gutters, sills, threshold, door canopies and bay windows should be discounted.
30. Porches should not render the home incapable of being moved, which means they should be demountable.
31. If structures, other than garages, are on pitches within the separation distance and are of a combustible construction, then the local authority should consider allowing sufficient time for them to be replaced with an acceptable non combustible model.
32. At no time should a garage constructed of combustible material be allowed in the separation distance.

Enforcement

33. In considering the enforcement of the separation distance the local authority should consult with the local Fire and Rescue Service. It should also seek the views and take account of representations from the site owner and affected residents before taking any steps to enforce this standard, where practicable.
34. Before the local authority undertakes any enforcement action it should consider the benefit of the works against the potential impact on the residents' enjoyment of their homes and the cost to the site owner.

Roads Gateways and Overhead Cables

35. Roads should be constructed of bitumen macadam or concrete with suitable compacted base. However, sites with roads constructed of tarmacadam (which is now obsolete and no longer commercially available) should not be required to automatically upgrade their roads. The roads should only be required to be upgraded as and when they begin to fall into disrepair.

36. Some larger sites may have traffic calming measures such as speed humps on their roads. Though not specifically covered in this standard, it will be worth ensuring that any legal requirements applying to un-adopted roads are met. Guidance and assistance can be found on the Department for Transport website, www.dft.gov.uk.
37. Gateways, roads and turnings should have enough clearance to allow safe entry for emergency vehicles and new units on lorries. The widths and heights given are based on the maximum sizes of emergency vehicles that may regularly attend incidents on sites.
38. In determining the permitted height of cable overhangs the local authority must take into account the current statutory requirements. Those applying as at the date of this guidance are found in the Electricity Safety Quality and Continuity Regulations 2002 SI 2002/2665 (ESQCR). These regulations provide that, in general, cables should not overhang a road at a height of less than 5.8 metres. In the case of fully insulated overhead conductors the ground clearance is 3.8 metres. There are a number of exceptions where:
 - The overhead line follows a route along a hedgerow, fences, boundary walls or similar features. The minimum clearance in these circumstances is 4 metres.
 - If it crosses a driveway with an access width of no more than 2.5 metres (and the driveway is defined by gateposts or similar features), the minimum clearance is 4.3 metres.Further advice on minimum clearances is available from the Health and Safety Executive.
39. It is good practice that all overhead lines on sites should be fully insulated and where a cable is in within easy reach of a property; it must be so and protected from interference.
40. The authority should require the site owner to comply with regulation 3 of the ESQCR and in considering any enforcement action in relation to cables must consult with the HSE.

Footpaths and Pavements

41. Communal path widths should normally be 0.9 metres in respect of new sites or sites that are undergoing substantial redevelopment (including expansion to part of the site); otherwise paths of not less than 0.75 metres should be accepted where they already exist.

Lighting

42. The lighting provided for communal paths and roads should be adequate to allow safe movement around the site during the hours of darkness. Many sites use low lighters rather than traditional street lamps and these work well as long as they are well maintained and plants/vegetation are not allowed to grow around them and stop them emitting light effectively. The lighting must be fit for purpose i.e. to allow vehicles and pedestrians to navigate around the site between dusk and dawn.

Bases

43. It is important to note that the construction, maintenance and repair of the concrete base are the responsibility of the site owner. New bases should be laid as a minimum in accordance with the current industry guidelines issued by the National Park Homes Council and the British Holiday and Home Parks Association. The Industry's current standard for the bases provides:

“A hard core base to a minimum depth of 150 mm, well consolidated and topped with 100 mm of concrete (mix as BS8500-2:2006¹⁰) shall be used. The finished raft must be generally level with due allowance for surface drainage. Where the ground conditions so require, thickening or the introduction of reinforcement of the raft may be necessary.”

44. Particular attention should be paid to the terrain of the site before a base is laid, which may mean a thicker base is needed. The base should be sufficient to handle the load placed upon it by the caravan and its contents.

Enforcement

45. When considering any enforcement action, the authority should also seek the views and take account of representations from the site owner and affected residents before taking any steps to enforce this standard, where practicable.
46. Before the local authority undertakes any enforcement action it should consider the benefit of the works against the potential impact on the residents' enjoyment of their homes and the cost to the site owner.
47. Where a caravan has to be removed in order to facilitate works to the base the authority should normally, if it is feasible and if it is the resident's wish, require the site owner to reinstate, at his own expense, the caravan on the original pitch on completion of the works.

Maintenance of Common Areas, including Grass, Vegetation and Trees

48. Cut grass and vegetation should be removed from the site as soon as practicable. Bonfires should not be used as a means of disposal. Vegetation is often used for sight screening but should be kept at a reasonable height.
49. Trees on the site will normally be the responsibility of the site owner. Where trees are in need of care and maintenance the local authority should, before any action is taken, liaise with the officer responsible for trees at the authority to ensure that all statutory and other requirements are complied with.
50. The common parts of the site (including roads, paths and pavements) must be kept free of any rubbish and maintained in a clean and tidy condition. The local authority may wish to consider whether appropriate receptacles for litter need to be provided in such areas. In any case the site owner should be required to make arrangement for the regular collection of routine rubbish from the site. He should also be required to make arrangements for the prompt disposal of waste and other materials which accumulate on the site during any works etc. Secure non combustible facilities should be provided on the site for the proper storage of rubbish and waste prior to its removal and disposal off the site.

Supply and Storage of Gas etc

51. The HSE website, www.hse.gov.uk, provides details and information about the various legislative requirements and contacts if further information is needed. In addition the trade body for LPG suppliers, [uklpg](http://uklpg.com), www.lpga.co.uk, also has information which may be of use.
52. Anyone being employed by a site owner to carry out work on gas (including natural gas) or oil installations should be suitably qualified to do the work. The HSE pages contain details of some of the schemes. The Communities and Local Government website contains details of various certification schemes which may apply. The details of these schemes can be found at www.communities.gov.uk .

Enforcement

53. In considering whether to take enforcement action for a breach of site licence conditions officers should liaise with the Health and Safety Executive to ensure any action taken by the authority is not in conflict with any action the HSE are proposing to take.

- 54. Local authority officials who identify areas of concern on sites should always consult the HSE about the problem(s).
- 55. All new installations must be to the current regulations and maintained at that standard.

Electrical Installations

- 56. The electrical installations on the site will be a distributor's network either belonging to the local regional electricity network operator or the owner of the site. The HSE website: www.hse.gov.uk contains information on the electricity legislation which may well apply to the site and can provide further information if needed.
- 57. A suitably qualified person for the purpose of carrying out work on electrical installations and appliances, including maintenance and inspections, includes a professionally qualified electrical engineer, a member of the Electrical Contractors Association, a contractor approved by the National Inspection Council for Electrical Installations Contracting, or a qualified person acting on behalf of the above.
- 58. It may be necessary to ensure the electricity distribution network complies with ESQCR, in which case such work should only be undertaken by a competent person familiar with those Regulations.
- 59. All new installations must meet the requirements of the current regulations and maintained at that standard.

Enforcement

- 60. In considering whether to take enforcement action for a breach of site licence conditions, officers should liaise with the Health and Safety Executive to ensure any action taken by the authority is not in conflict with any action the HSE are proposing to take.
- 61. Local authority officials who identify significant areas of concern with site electrical networks and installations should always consult the HSE about the problem(s).

Water Supply

62. OFWAT lay down service standards for the water suppliers and details can be found on their website at www.ofwat.gov.uk . In addition there are various schemes for suitably qualified persons and authorities should check to see those undertaking works are qualified. The main scheme is run by NIC certification and details can be found about the scheme at www.niccertification.com .

Enforcement

63. With the majority of well established sites, enforcement of this section will need to be carefully handled, as most sites will have long established water systems. As with gas and electricity above, there may be a case for dual enforcement if an offence is identified. Consultation with the Environment Agency and the local water company is essential.
64. As with the previous sections, local authority officers who identify an issue with water supply on a particular site may wish to advise the Environment Agency, and the local water company of the problem.
65. All new installations must be to the current regulations and maintained at the appropriate standard.

Drainage and Sanitation

66. As with water supplies, provision of sewerage facilities is overseen by OFWAT and codes of practice are in place.
67. It is important that all drains and sewers are well maintained and are connected to the appropriate system. If left unchecked, there can be consequences for the health of residents, along with those who live near the site.
68. It should be noted that the environmental quality of drainage is regulated by the Environment Agency, with whom the local authority must consult about any problems.

Enforcement

69. In considering whether to take enforcement action for a breach of site licence conditions officers should liaise with the Environment Agency to ensure any action taken by the authority is not in conflict with any action the Agency are proposing to take.

- 70. Local authority officials who identify areas of concern on sites should alert the Environment Agency and the local water company to the possible defects.
- 71. All new installations must be to the current regulations and maintained at that standard.

Domestic Refuse Storage and Disposal

- 72. If communal bins are provided they should be of a type that is non-combustible and stored properly. Liaison with colleagues who deal with refuse collection matters will help in ensuring that the bins provided by the site owner (in the case of communal bins) are acceptable to the local authority in pursuance of its collection of rubbish from them.
- 73. The site owner should be required to discuss with the local authority arrangements for the separation of waste for the purpose of recycling it, and require him to provide the necessary receptacles etc on the site.

Communal Vehicular Parking

- 74. Parking needs will vary considerably between individual parks. Parking requirements should reflect the reasonable needs of the residents, having regard to the size and layout of the site, the number of units, the occupation criteria of the site and the availability of public transport in the immediate vicinity.
- 75. Provision of parking spaces on new sites or those undergoing redevelopment or extension should be consistent with local planning policies.

Communal Recreation Space

- 76. This standard should only be applied if the local authority is satisfied that it is both practicable to provide recreation space on the site and there is insufficient recreation space off the site in the near locality.
- 77. It will only be practicable to provide such space on the site if there is sufficient open space which is available and it is possible to safely use that space for recreation. The standard requires the local authority to consider the need for recreation space; it does not require it to consider the need for recreation facilities, although the local authority may consider that need as part of a licence condition. The larger the site the more recreation space or spaces may

be needed. On small sites there may be no need for space at all. In deciding whether it is practicable to provide the space the authority should also consider the site layout, the availability of private open spaces (e.g. within the pitch), the availability of other amenities on the site (e.g. club houses) and the age and number of residents on the site.

78. On site recreation space may be considered unnecessary if there is sufficient suitable space available off site within close (walking) distance of it. The space must, however, be freely accessible by the public, such as a municipal park, commons land, and greens or any part of the countryside to which the public have a right to walk.

Notices and Information

79. It is important that all notices are protected from the weather and are prominently displayed, either on a board, in an office open to the public, or other places on the site which the residents have free and reasonable access to.
80. The notices must include the most recent site licence, and the contact details of the site manager, and if different the licence holder. This should include an out of hours contact number for emergencies, and if available an e-mail address.
81. The site owner is also required to make available certain information for inspection by residents in a prominent position on the site. That could be the site office provided it is open at reasonable times, a community room which every resident was entitled to use and which is also open at reasonable sites or a notice board located at the entrance to or in a central part of the site.

Flooding

82. It is important that if a site is in an area susceptible to flooding, procedures are in place to ensure that all those on the site are alerted quickly, and that they are aware of any evacuation procedures that may be in place. A notice should be prominently displayed with all relevant information.

83. The site should be included in any local authority flood evacuation plan.
84. Advice on flood risks is available from the Environment Agency website:
www.environment-agency.gov.uk
85. It is important in those parts of the country where flooding is an issue that local authorities have effective liaison with the Environment Agency office for their area, as well as relevant officials across their own local authority. Local water companies should also be contacted.

Fire Safety Measures

86. The Regulatory Reform (Fire Safety) Order 2005 (the Order) applies to caravan sites. The Order disapplies some fire related standards that may be in current site licensing conditions. It applies to all non domestic premises in England and Wales, including certain types of caravan sites:
 - all sites with common or shared parts; and
 - individual caravans which are holiday-let type i.e. they are rented out
87. On such sites the local authority should advise the 'responsible person', who will be the licence holder of his duty under that Order to undertake a fire risk assessment and decide what prevention and protection arrangements are appropriate and adequate to mitigate the identified risks.
88. However, there are some sites around the country which do not fall under the Order. These may include single unit sites and those sites which are occupied by single family groups.
89. Where the Order applies the authority should satisfy itself that the site owner is aware of, and complying with, his obligations under it, in particular that a fire risk assessment has been carried out. In this regard the local authority should seek the advice of the local Fire and Rescue Service who are the main enforcers of the Order.
90. The Communities and Local Government website:
www.communities.gov.uk contains a range of helpful information on fire safety and the requirements of the Fire Safety Order. This includes links to technical guides for specific types of accommodation, including one for sleeping accommodation.

- 91. The Fire and Rescue Service has a duty to provide fire safety advice to those who ask for it, although it will not carry out risk assessments.
- 92. In applying any standards relating to fire safety measures where the Order does not apply, the local authority must consult the local Fire and Rescue Service.

Fire Fighting Equipment

- 93. The Guidance under the remaining sections only applies to sites to which the Order does not apply; however these standards will provide a useful benchmark of the sort of preventative and protective measures that may be necessary following completion of a fire risk assessment.
- 94. The siting of the fire points should be so that they are visible at all times, and marked in a way that makes it obvious as to what they are. They will need to be kept clear of any obstructions at all times should they be needed in the event that a fire breaks out.
- 95. Fire Points are the places on sites where fire fighting equipment is stored, ready for use by anyone in the event of an emergency.
- 96. If hosepipes are provided, they should be of the relevant British and European Standards¹¹, and positioned in such a way that they are easily attachable to the mains water supply, if not permanently attached. Any valves connecting the hose to the water supply should be easily accessible. The hose reel should be well maintained and in good working order.
- 97. Any hydrants provided on the site should be kept clear of any obstruction in the event that they need to be used. The positioning of mains connected hydrants is the responsibility of the local water company, and any queries as to whether a site has a hydrant should be directed to them. The positioning of the hydrants should be recorded on the site map, which will assist the emergency service in locating them in the event of an emergency.
- 98. Fire Extinguishers should only be used if there is not enough water pressure for a hose reel. Where provided, extinguishers should comply with the current British or European Standard.

99. A water tank with buckets and a pump should not be the main means of fighting fire for the following reasons:
- Pumps and buckets are likely to be vandalised or stolen.
 - Pumps and buckets are inadequate for fighting a fire.
 - A water storage tank should be securely covered to prevent it becoming a health or safety hazard.

Fire Warning

100. The means of raising the alarm in the event of a fire should be appropriate to the size and layout of the site. If you are unsure of which form of raising the alarm is the most suitable to the site, then contact the local Fire and Rescue Service, who will be able to advise you.

Maintenance and Testing of Fire Fighting Equipment

101. It is important that all fire warning systems and fire fighting equipment are regularly inspected and maintained. The suggestion is that these checks should be carried out on an annual basis. All testing and maintenance should be carried out by a person suitably qualified to do the work. Records should be kept of any testing and when the most recent inspections were carried out. The record of all tests and inspections should be kept on the site for inspection.

Fire Notices

102. The fire action notice should be displayed on a notice board, and at other suitable points around the site. The full address of the site, including the postcode should be included.

Enforcement

103. The main enforcer for the Order is the Fire and Rescue Service.

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (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.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Cambridge City Caravan Site Licensing & Fee Policy

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Agenda for Housing Scrutiny Committee on Thursday, 20th January, 2022, 5.30 pm - Cambridge Council

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
Recent national legislative changes including the introduction of the Mobile Homes (Requirement for Manager of Site to be Fit and Proper Person) (England) Regulations 2020 have established a need for an encompassing policy setting out how the Council will carry out its statutory requirements for caravan site licensing, inspection, fit and proper person

determination, enforcement and fee setting. These are national legislative requirements that local authorities in England

4. Responsible service

Environmental Services

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- ☒ Residents
☐ Visitors
☐ Staff

Site owners and managers of caravan sites within the City.
Residents who occupy units of accommodation as their home on these sites within the City.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?

- ☒ New
☐ Major change
☐ Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)

- ☐ Yes
☒ No

N/A

[Click here to enter text.](#)

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

Non key agenda item at Housing Scrutiny Committee on 20th January 2022.

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

Reference to relevant government guidance including - [Mobile Homes Act 2013: a guide for local authorities on setting licence fees - GOV.UK \(www.gov.uk\)](#)

[Tackling inequalities faced by Gypsy, Roma and Traveller communities - Women and Equalities Committee \(parliament.uk\)](#)

The Council's 'Our Vision' - [Our vision - Cambridge City Council](#)

Local knowledge from licensing of 2 existing, established residential caravan sites within the City - [Caravan and camp sites - Cambridge City Council](#)

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

There is no specific impact from this policy regarding age.

The 'fit & proper' person assessment will seek to ensure that those individuals involved in the management of caravan sites are competent and have relevant experience inc. identification of safeguarding issues for children and adults at risk which may therefore lead to a positive impact for any children or adults at risk who may become resident on sites.

(b) Disability

There is no specific impact from this policy regarding disability.

The policy encompasses caravan site licensing criteria for the City in terms of existing sites of which there are 2 and any applications made for new sites thus ensuring safety &

suitability standards. Ensuring safety and suitability standards which can help prevent disability or long-term health issues.

Anybody making an application for a new caravan site licence / fit & proper person assessment can be provided with support as necessary in terms of making / submitting their application. Examples as to support that can be provided e.g. an appointment to meet with case officer who can support face to face / over the telephone with completion of the application. BSL interpretation/Braille translation Provision of documents in accessible / easy read formats etc.

(c) Gender reassignment

There is no specific impact from this policy for people with the protected characteristic of gender reassignment.

(d) Marriage and civil partnership

There is no specific impact from this policy regarding marriage and civil partnership.

Site owners / managers who are applying to licence a caravan site / to be included on the fit & proper person register will be making individual applications.

(e) Pregnancy and maternity

There are no specific impacts to pregnancy and maternity have been identified in relation to this policy.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Applications may be received for new Gypsy Roma & Traveller sites within the City as these are included within the legislative definition of a ‘relevant protected site.’ Guidance specifies that Local Authorities assess GRT sites against the same criteria as traditional sites. A Gypsy, Roma and Traveller accommodation needs assessment is undertaken for city and surrounding districts to identify need for permanent and/or temporary sites. If need identified, then this would be addressed through the Local Plan and for individuals wanting

to set up new site relevant planning permission would need to be sought via the Councils planning service prior to an individual site licence application being made. Anybody making an application for a new caravan site licence / fit & proper person assessment can be provided with support as necessary in terms of making / submitting their application. Examples of support that can be provided e.g. an appointment to meet with case officer who can support face to face / over the telephone with completion of the application. BSL interpretation/Braille translation Provision of documents in accessible / easy read formats etc.

(g) Religion or belief

No impacts specific to religion or belief have been identified in relation to this policy.

(h) Sex

No impacts specific to men or women have been identified in relation to this policy.

(i) Sexual orientation

No impacts specific to an individual's sexual orientation have been identified in relation to this policy.

j. Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).**

Low-income groups or those experiencing the impacts of poverty:

There may be a negative impact on such site residents owing to this policy. The policy introduces annual site inspection fees and a 5 yearly, (this is the term of the register entry in most cases), fit & proper person assessment fee. Site owners / managers may look to offset the cost of these fees against rent. This should however have a minimal impact in terms of the 2 existing sites within the City as there are several units of accommodation on

each site – 24 on one site and 23 on the other. Site owners / managers of the 2 existing caravan sites within the City have been informed of the proposed introduction of this policy inc. fee setting. To be deemed 'fit & proper' to be involved in the ownership / management of a licensed caravan site there has to be adequate financial means available for management and maintenance of a site assessment of this will limit the possibility of any of the associated fee costs being offset onto the residents.

Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage:

Research states that Gypsy, Roma and Traveller people are more likely to have long-term health issues than general population ([Tackling inequalities faced by Gypsy, Roma and Traveller communities - Report Summary - Women and Equalities Committee \(parliament.uk\)](https://www.parliament.uk/research/2018/04/tackling-inequalities-faced-by-gypsy-roma-and-traveller-communities-report-summary-women-and-equalities-committee)). Therefore, better ensuring safety & suitability standards will have positive impact. Also, the communities are disproportionately likely to have low incomes so if rent costs become higher due to site managers offsetting caravan site policy fees to rent costs this may have a negative impact on their ability to stay on sites or afford to settle on sites.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

Review policy annually, (there will be a review of the fee setting annually as part of the Councils wider budget setting process) / the policy will be reviewed further as necessary in between annual reviews in-line with any further legislative additions / amendments.

As part of ongoing review ensure that officers involved in licensing of caravan sites within the City inc. annual site licensing inspections / responding to any requests for service from residents of existing sites, record details of their involvement / intervention. If any barriers are identified that relate to being from a protected characteristic, reviewing what steps were undertaken in line with the policy and what did or didn't work. Following this, if there was a recurring issue for a protected characteristic group and it was felt that the Caravan Site Licensing & Fees Policy exacerbated it, immediately undertake a review this section of the policy.

12. Do you have any additional comments?

The Cambridge City Caravan Site Licensing & Fees Policy aims to help the council meet our vision of Cambridge as a "great place to live" and a city which strives to ensure that all local

households [of all equalities groups] can secure a “suitable, affordable local home, close to jobs and neighbourhood facilities.”

All individuals as residents could be positively impacted on by this policy encompassing caravan site licensing criteria for the City thus ensuring safety & suitability standards in relation to any such new or existing site operating in the City and ensuring that those who operate them are deemed ‘fit & proper’.

13. Sign off

Name and job title of lead officer for this equality impact assessment: Claire Adelizzi, Team Manager - Residential

Names and job titles of other assessment team members and people consulted: Helen Crowther, Equality & Anti-Poverty Officer

Date of EqlA sign off: 05.01.2022

Date of next review of the equalities impact assessment: January 2023

Date to be published on Cambridge City Council website: 10.01.2022

All EqlAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer. Ctrl + click on the button below to send this (you will need to attach the form to the email):

Send form

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Approval of the 'Streets to Home service' budget

To:

Mike Todd-Jones, Executive Councillor for Housing, Housing Scrutiny Committee, 20/01/2022

Report by:

David Greening, Head of Housing,

Tel: 01223 457997 Email: David.greening@cambridge.gov.uk

Wards: All

Key Decision

1. Executive Summary

- 1.1 In a partnership arrangement with Cambridgeshire County Council, the City Council wishes to commission a single service that will assist rough sleepers to quickly move from the streets into accommodation.
- 1.2 The 'streets-to-home' service is expected to commence in April 2022 and will be commissioned by combining funds from the County Council's housing-related support budget with City Council funding formerly made to enable the annual homelessness prevention grant bid round.
- 1.3 The proposed service has been the subject of an open tender exercise which has yet to conclude in the formal appointment of a contractor, but the contract sum has already been determined, including the City Council contribution.
- 1.4 The decision sought is that the City Council may spend its determined contribution as set out in paragraph 3.6 of this report, and that the authority to endorse the award of the contract to the winning bidder is delegated to the Head of Housing.

2. Recommendations

The Executive Councillor is recommended to:

- 2.1 Approve the City Council financial contribution as set out in paragraph 3.6 of this report.
- 2.2 Delegate to the Head of Housing the authority to endorse the award of the contract to the winning bidder.

3. Background

- 3.1 For many years the Council has awarded grants to agencies and organisations providing services intended to prevent or relieve homelessness.
- 3.2 While we have been able to fund vital, valued and effective services for rough sleepers through the homelessness prevention grant process, we have questioned whether an annual award to a range of individual providers is the best way to deliver a unified, value-for-money service in this increasingly complex area of homelessness and support.
- 3.3 The streets-to-home service brings together in one multi-year contract services formerly provided by several agencies. The service will be funded by pooling those formerly separate grants and combining this with County Council housing-related support funding. The contract will run for an initial three years with the option to extend to five and then seven years. This amounts to a substantial contract sum as set out in 3.6 below.
- 3.4 This change has several advantages, including:
 - The ability of the two councils to better coordinate activity and direct and shape the service we want rather than the services agencies wish to provide.
 - Permitting better coordination of services that have formerly overlapped, avoiding duplication.
 - Being able to plan over the longer term, having particular regard for the government's commitment to eliminate rough sleeping in the life of the current parliament.
 - Giving providers greater surety of financial support, allowing more certainty when investing in staff and facilities.

- 3.5 It is important to note that there is no reduction in direct City Council funding for services for rough sleepers as a result of the streets-to-home service; indeed, there is a small overall increase. (See Financial Implications below). Moreover, the new service incorporates within the contract all the key service elements formerly funded by an annual grant, plus additional elements made possible by the advantages of scale as outlined in 3.4 above.
- 3.6 The value of the contract and the City Council element is as set out below:

	Annual value (£)	Maximum contract value (£)
Cambridge City	371,364	2,599,548
County Council	973,969	6,817,783
Total	1,345,333	9,417,331

Implications

a) Financial Implications

The financial commitment is as set out in paragraph 3.6 above.

As is detailed in paragraph 3.5 of the next report to be considered by this committee (*Homelessness Prevention Grants to Agencies 2022-23 and proposed associated reallocation of funding*), the amount available for individual grants to agencies plus the £371,364 per annum set aside for Streets-to-Home gives a total of £696,364. This contrasts with the smaller sum of £695,770 committed in 2021-22 to the totality of services for rough sleepers.

b) Staffing Implications

None

c) Equality and Poverty Implications

Please see the accompanying EqIA.

d) Net Zero Carbon, Climate Change and Environmental Implications

No positive or negative impact identified as the Streets to Home Service reorganises services already in existence.

e) Procurement Implications

An open tender exercise has been conducted on behalf of the two local authorities by Cambridgeshire County Council.

f) Community Safety Implications

None.

4. Consultation and communication considerations

A number of formal and informal consultation exercises have been carried out over the past two years, including discussions with service providers and users; senior and operational officers within each local authority; officers from the department of Levelling Up, Homes and Communities, and local authority partners.

Consultation with partners centered around a discussion brief which evolved in the light of discussion. The final iteration of that document is attached as Appendix 1.

5. Appendices

Appendix 1: Streets to Home discussion paper

6. Inspection of papers

If you have a query on the report please contact James McWilliams, Housing Services Manager - Housing Advice. Tel: 01223 457813. Email: james.mcwilliams@cambridge.gov.uk.

Appendix 1: Streets to Home Service – Discussion paper

1. Proposal:

Cambridge City Council and Cambridgeshire County Council will (subject to member approval) align agreed elements of their budgets relating to adult homelessness and take a collaborative approach to jointly developing a 'Streets to Home' service.

- The specific themes within the Streets to Home proposals are outlined at section 4 of this paper but there are some overarching principles to also emphasise; these are as follows:
- Providing a single commissioned Streets to Home service will provide longer term funding for the holistic effort to tackle rough sleeping – at present we have a myriad of grants, commissioned services and third party funded services supporting this effort
- A single service approach should, in turn, should lead to a more cohesive and less duplicated effort
- The operational service will be able to function more responsively to an agreed strategic approach
- This proposal is not just about funded services; it also aims to set the focus for the way in which volunteer services can support the effort – during the Covid-19 lockdown period and beyond, volunteer services demonstrated the critical part they can play in preventing rough sleeping rather than dealing with its consequences.
- The Streets to Home service proposals are not motivated by the need to make cuts; they are designed to achieve better outcomes for users of the service. More detail on funding is provided at section 6 below.

2. Background:

The next few years pose significant challenges and opportunities in the area of designing and commissioning housing and support services for people whose homelessness is a more complex problem than just the need for accommodation. The context is the familiar one of having to do more with the same resources, but it is also different in that there appears to be a growing realisation that 'business as usual' – essentially the progression model taking a rough sleeper from streets to assessment centre, to hostel, to 'move-on' accommodation and, finally, into a tenancy - is failing to resolve the street homeless problem and that we need to consider different ways to do things.

Hostels have helped plenty of people find a route out of homelessness, but for many of the most challenging single homeless people, hostels may provide only a partial or temporary fix leading to repeat homelessness and the frustrating continuing presence on the streets of people known to be in accommodation. Many rough sleepers refuse hostel accommodation outright.

The City and County Councils are working together to develop a sustainable Housing First offer for Cambridge City, building on an existing pilot. Once established, Housing First will be able to provide an alternative to traditional hostel accommodation for some of the City's more complex rough sleepers.

In addition to Housing First, the City Council is also piloting a range of novel approaches. Plans are now well-advanced to establish an initial batch of 21 modular homes on several sites. Another scheme will see an initial offer of five three-bedroom general needs properties in low demand given over as shared accommodation to pairs of former rough sleepers who have expressed a preference to be housed together. In addition a major new initiative is underway to procure many more privately-rented homes for rough sleepers supported by the recent welcome increase in the local housing allowance and an upward revision of the maximum top-up available under the Council's HB Plus scheme. In addition, a recent grant application to the Ministry of Housing, Communities and Local Government has secured funding to allow the City Council to guarantee rents to private landlords for one year for 20 self-contained one-bedroom flats.

Relative to overall local provision, the number of rough sleepers housed under these novel schemes will initially be modest: hostels will continue into the mid-term to provide support and accommodation for the majority of those in Cambridge who are single and homeless. The development of these new approaches will mean that some people may be able move directly from the streets into their own home without an intervening period in a hostel. It also has the potential to reduce the length of time people spend in hostel accommodation before moving into a home of their own - be that a privately-rented home, a socially-rented home or one of the aforementioned novel solutions.

These changes - while foreshadowed by developments in recent years and especially the government's pledge to end rough sleeping by 2027 – have been endorsed and enormously validated by the recent effort to get “everyone in” in response to Covid 19.

3. Covid 19:

We are all very aware of the impact that the Covid 19 pandemic has had on the country as a whole, but also particularly on the rough sleeping community. The steps government and local authorities have taken to accommodate those on the streets in emergency accommodation in response to Covid 19 means that high numbers have engaged with services in a way not seen before. Though complex and costly, this has also presented an unprecedented opportunity to help us turn the tide on rough sleeping.

The Covid crisis has highlighted the value of current services in supporting vulnerable homeless people, but has also shown us that there is scope to do things differently, and we want to make sure we capture this learning and use it to inform our service re-shaping work.

During this period volunteer services demonstrated their worth more than ever; providing an impressive coordinated effort to support people in their accommodation and prevent a return to rough sleeping. It is important that we build on this work; the voluntary sector offer would be hugely valuable in complementing the commissioned service and provide additional resource/support.

4. Developing a ‘Streets to Home’ service:

The intention in developing this service will be to deliver a model that helps us reduce the number of people on the street, and increase the number of people with support needs able to live in their own stable accommodation. The ‘Streets to Home’ approach should;

- ensure each individual has a lead professional to support them through the stages of their journey out of homelessness
- operate across the traditional ‘street / home’ service boundaries
- offer flexible, personalised support, planned with the individual
- be adaptive and proactive in their support offer

- ensure access to ongoing support for as long as it is needed
- be focussed on tenancy attainment and then tenancy sustainment;
- be skilled at facilitating access to specialist support (such as drug and alcohol services) at the point it may be needed;
- develop strong partnerships with other local non-commissioned and voluntary groups in order to maximise the opportunities for clients and minimise duplication
- build on the successes achieved during the Covid 19 pandemic, by refocusing volunteer-based services on sustaining those in accommodation and delivering fewer services to those on the streets

5. Contract arrangements:

The contract arrangement for the 'Streets to Homes Service' can not be determined until there is a clear understanding of what the final model might look like and how the alignment of funding and delivery would work.

Consideration also needs to be given to how co-location could support integration of services delivered through existing statutory arrangements e.g. the Housing Advice Hub and Dual Diagnosis Street Partnership (DDSP) elements.

Various options will be considered such as having different contract 'lots' to cover different aspects of the new service. However, it is unlikely that the current arrangement of having a multitude of different contracts in place would be the preferred option going forward.

The minimum contract period will be 3 years with an option to extend for a further 2. However, as this is a large and complex service, the councils will consider whether a longer term contract would be more appropriate.

6. Funding:

The funding for delivering the new model would be provided using existing budgets which the County and City Councils are currently spending on rough sleeping, homelessness and related services. There are no cuts planned beyond those the County have already outlined in its Housing Related Support Review and the figures provided below represent the minimum annual amount committed for the duration of the contract.

Based on current projections, the anticipated level of pooled funding available for delivering this new model could be around £1.67m. Around £1.07m from the County Council and around £600k from the City Council. Some of the City Council's existing Homelessness Prevention Grant programme will be diverted into the commissioning of the Streets to Home service but the Council will still run an annual Homelessness Prevention Grants programme worth around £315k per annum

7. Referral and Pathway arrangements:

It is important that those accessing services can do so quickly and easily. We accept that a single point of access to services may be counterproductive in some situations, and therefore we would seek to develop a route with a general point of access alongside promotion of a single assessment approach. This would enable a consistent assessment approach to be taken for those who would be better served by an 'in situ' assessment.

In developing Streets to Home, we are seeking to move away from a linear pathway which anticipates that the majority of people will follow a set path on their journey out of homelessness.

Instead we want to encourage a flexible system that can facilitate access to services at the point which is best for the individual, taking account of their needs and circumstances and, wherever possible, allowing them to choose the option that is best for them.

8. Scope of the service:

The diagrams below (*Fig 1 & Fig 2*) illustrates the range of services that would potentially be delivered through the 'Streets to Home' model and what a new pathway could look like.

Whilst the 'Streets to Home' model will bring together a range of commissioned services, we fully acknowledge that there will continue to be other things provided by the wider voluntary sector which sit outside of this.

Our expectation would be that the Streets to Home service worked in partnership with local voluntary sector organisations, and supported them in developing initiatives that could support and complement the commissioned offer.

9. Consultation.

The following organisations and agencies were consulted in the development of the proposed service:

- Riverside Care and Support.
- Jimmy's Cambridge
- Change, Grow, Live.
- Wintercomfort For the Homeless
- Counting Every Adult
- Department of Levelling Up, Housing and Communities
- It Take a City
- Cambridge Churches Homelessness Project
- Cambridge Co-Production Group
- Cambridge Cyrenians
- Cambridgeshire and Peterborough Foundation Trust

These organisations represent the current main providers of services to local homeless people and include input from service users.

Fig 1

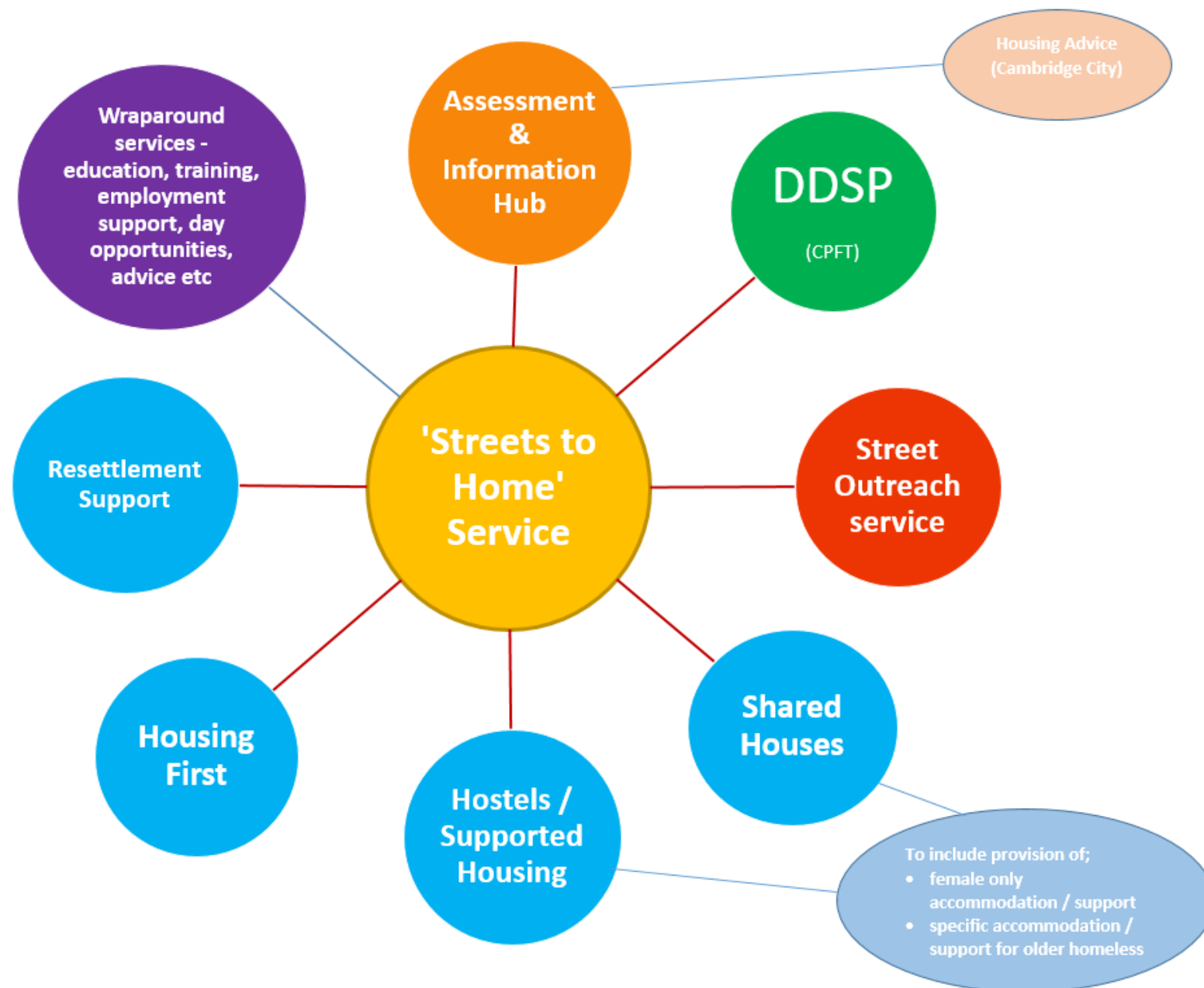


Fig 2

Cambridge City Accommodation Pathway for Rough Sleeper & Single Homeless Services

ALL Referrals from ALL sources

Central Accommodation
Assessment Centre

Temporary, direct
access hostel
accommodation
(Up to 3 months stay)

Referral to Housing
First Case Group
(open ended support)

Lower Level hostel accommodation
or shared housing (6 to 12 months)
for those with a good level of
independent living skills

Longer term hostel
accommodation (12 to 18 months)

City Council Housing Advice – for
anyone identified as needing
temporary accommodation or
with an accommodation need but
no, or only very low support needs

Onward referral to

Onward referral to

Longer term hostel
accommodation (12
to 18 months)

Shared house
/accommodation

Lower Level
hostel
accommodation
(6 to 12 months)

Reconnection
to another
area

HARP

HomeLink

Private sector

Onward referral to any of the options on bottom row

Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (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.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Streets to Home Service

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Details of the project can be found here .

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
<p>The streets-to-home service brings together in one multi-year contract services formerly provided by several agencies. The service will be funded by pooling those formerly separate grants and combining this with County Council housing-related support funding. The contract will run for an initial three years with the option to extend to five and then seven years.</p> <p>This change will achieve several advantages over the current multi-provider arrangement, including:</p> <ul style="list-style-type: none">• The ability of the two councils to better coordinate activity and direct and shape the service we want rather than the services agencies wish to provide.• Permitting better coordination of services that have formerly overlapped, avoiding duplication.

- Being able to plan over the longer term, having particular regard for the government's commitment to eliminate rough sleeping in the life of the current parliament.
- Giving providers greater surety of financial support, allowing more certainty when investing in staff and facilities.

4. Responsible service

Housing Services

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service?

(Please tick all that apply)

- ☒ Residents
☐ Visitors
☐ Staff

Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):

Single people who are homeless, threatened with homelessness, have a history of homelessness or who are sleeping rough.

6. What type of strategy, policy, plan, project, contract or major change to your service is this?

- ☒ New
☐ Major change
☐ Minor change

7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)

- ☒ Yes
☐ No

If 'Yes' please provide details below:

This is a joint project with Cambridgeshire County Council.

A number of formal and informal consultation exercises have been carried out over the past two years, including discussions with current service providers and users; senior and operational officers within each local authority; officers from the department of Levelling Up, Homes and Communities, and partner services within the City Council. A full list of consultees is found at Section 9 of Appendix 1.

8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?

Will be considered by Housing Scrutiny Committee on 20 January 2022.

9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?

The service specification for the Streets to Home service was developed in consultation with the organisations listed at Section 9 of Appendix 1. People with lived experience of homelessness and current service users were included in the consultation exercises.

Consultation was conducted through a process of dialogue permitting full exploration of a wide range of views, positions and interests and allowing consultation partners to shape the service specification.

The service specification and the tender exercise to determine the service provider placed equality issues at the centre and required all bidders to say how they would comply with the Equality Act 2010 and how they would reach, and deliver services to, people with one or more protected characteristics.

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

The Streets to Home Service will be available to all qualifying adults. No negative or positive impact due to a person's age has been identified.

(b) Disability

The service specification recognises that people with mental ill-health may more frequently become homeless and, when they do, are more likely to remain homeless for longer and more likely to become homeless repeatedly. Homeless people are also more likely to develop physical illnesses. If ill health is sufficiently disabling a homeless person is likely to be in priority need and likely to be

assisted under the homelessness legislation. The new service is for people not meeting the priority need threshold or are otherwise unable to qualify for statutory homelessness assistance. In this way the new service, with its focus on getting people quickly into accommodation, will make a positive impact on the health of people with this characteristic.

(c) Gender reassignment

The Streets to Home Service will be available to all qualifying adults. No impacts have been identified specific to people with the protected characteristic of gender reassignment.

(d) Marriage and civil partnership

The Streets to Home Service will be available to all qualifying adults. No impacts have been identified specific to marital or civil partnership status.

(e) Pregnancy and maternity

The Streets to Home service is for those deemed not to be in priority need, as determined by the Housing Act 1996 (and subsequent amending legislation). A pregnant woman is automatically in priority need and will therefore have no need to make use of this service.

(f) Race – Note that the protected characteristic ‘race’ refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

The Streets to Home Service will be available to all qualifying adults. No negative or positive impact due to a person’s race, colour or nationality has been identified.

(g) Religion or belief

The Streets to Home Service will be available to all qualifying adults. No impacts have been identified specific to religion or belief.

(h) Sex

The Streets to Home Service will be available to all qualifying adults. However, male rough sleepers consistently outnumber female rough sleepers by an average ratio of four to one. This said, there is good evidence from service users and local and national organisations assisting homeless women

that some women avoid rough sleeping through arrangements which may put them at risk. The new service will be required to provide outreach, and make accommodation offers, informed by this insight. Overall, therefore, the new service will make a positive impact in relation to this characteristic.

(i) Sexual orientation

The Streets to Home Service will be available to all qualifying adults. There are no impacts identified specific to the protected characteristic of sexual orientation.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- **Low-income groups or those experiencing the impacts of poverty**
- **Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).**

The overwhelming single characteristic of people presenting to the housing advice service is their relative poverty. For example, in a recent audit more than nine out of ten people seeking housing advice were either unemployed or working fewer than 16 hours a week. Homelessness is causally-related to poverty. The new service will therefore positively impact on alleviating poverty or the consequences of poverty.

People experiencing homelessness often have overlapping disadvantages and/or vulnerabilities, associated with or caused by inequality they experience related to their protected characteristics. For instance, many homeless people have physical and mental health issues. Also, ethnic minority people, women, and disabled people (and especially people from two or more of these three groups) are more likely to experience poverty in the first place that can lead to homelessness or risk of homelessness.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqIA accordingly.)

The provider of the new service will be required to present quarterly reports throughout the life of the contract. This will include monitoring covering each protected characteristic.

12. Do you have any additional comments?

No

13. Sign off

Name and job title of lead officer for this equality impact assessment: James McWilliams, Housing Advice Service Manager

Names and job titles of other assessment team members and people consulted: Jackie Hanson, Community Funding & Development Manager; David Greening, Head of Housing; Mike Todd-Jones, Executive Councillor for Housing; Helen Crowther, Equality and Anti-Poverty Officer.

Date of EqlA sign off: 05/01/2022

Date of next review of the equalities impact assessment: 01/04/2023

Date to be published on Cambridge City Council website: 10/01/2022

All EqlAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer at helen.crowther@cambridge.gov.uk.



Homelessness Prevention Grants to Agencies 2022-23 and proposed associated reallocation of funding.

To:

Mike Todd-Jones, Executive Councillor for Housing, Housing Scrutiny Committee, 20/01/2022

Report by:

David Greening, Head of Housing,

Tel: 01223 457997 Email: David.greening@cambridge.gov.uk

Wards: All

Key Decision

1. Executive Summary

- 1.1 This report details the annual bid round for grants made to organisations providing homelessness prevention services. It provides an overview of the process, the grant eligibility criteria and the budget. Appendix 1 details the applications received with recommendations for 2022-23 awards.
- 1.2 The report also recommends that in the coming year, and thereafter, an alternative source of funding is used to finance these grants.
- 1.3 The report further proposes that, subject to the alternative funding proposition being agreed, the former homelessness prevention grant budget is repurposed to enable:
 - a) secure funding for the new 'Streets-to-Home' service (covered in a separate report to this committee); and
 - b) secure funding for existing Housing Advice Service staff.

2. Recommendations

The Executive Councillor is recommended to:

- 2.1 Approve that from 2022-23 onwards, homelessness prevention grants are funded from the annual homelessness prevention grant award the Council receives from central government.
- 2.2 Approve the award of homelessness prevention grants to voluntary and community organisations for 2022-23, as set out in Appendix 1 of this report.
- 2.3 Approve that from 2022-23 onwards the budget formerly used to fund homelessness prevention grants will instead be used to fund the new Streets-to-Home service and the additional staff roles that were created within the housing advice service in 2018 in response to the additional statutory duties enshrined in the Homelessness Reduction Act.

3. Background

Page: 2

Bid round process and award recommendations

- 3.1 Each year the Council invites agencies and organisations to submit bids for funding for homelessness-related services. The 2022-23 bid round opened for applications on 2 August 2021 and closed on 4 October. A communications and publicity plan was implemented including a press release, newsletter articles, workshops, emails, networking and targeted conversations to promote the grant fund. A range of activities were undertaken to support organisations to understand the funding criteria and the requirements for a successful application.
- 3.2 Bids were initially considered by individual officers using a common assessment matrix, and then moderated by those officers meeting as a panel. Bids were assessed having regard to the degree to which the proposed service will prevent or relieve homelessness. More broadly, officers considered the strategic and operational value of the proposed service, whether the proposed service duplicated an existing service, and the ability of the submitting agency to self-fund in whole or in part. The Executive Councillor attended a meeting with officers to review the process and outcomes.

- 3.3 Award recommendations are set out in Appendix 1 and notes include, where a nil grant has been recommended, the key reasons why. Members will wish to note that bids received totaled £620,578, almost twice the funding available.
- 3.4 The total sum available for individual grants in 2022-23 is £325,000 in contrast with £428,790 available for individual grants in 2021-22. This change is explained by the sum that has been set aside for the 'Streets-to-Home' service in the paragraph below.
- 3.5 As detailed in the preceding committee report, the Streets-to-Home service encompasses, and expands upon, services that were previously funded from the homelessness prevention grant budget. The amount available for individual grants and the £371,364 set aside for Streets-to-Home gives a total of £696,364. This contrasts with the smaller sum of £695,770 committed in 2021-22 to the totality of services under discussion here.

(The 2021-22 figure also included £65,000 towards the Dual Diagnosis Street Project (DDSP) which will be funded separately in 2022-23. This means that like-for-like funding in 2022-23 will be £65,594 greater than in the current year, subject to approval).

Securing funding for long-term commitments

- 3.6 The annual homelessness prevention grant bid round has previously been funded from a core budget within the general fund. By contrast, additional permanent staff roles created in 2018 to ensure an appropriate response to new duties resulting from the introduction of the Homelessness Reduction Act 2017 have been funded from the annual homelessness prevention grant the Council receives from central government. It is anomalous that long-term commitments are funded from short-term budgets and visa-versa.
- 3.7 This same consideration applies to the new Streets-to-Home service for rough sleepers which may involve, if contract extension options are exercised, a financial commitment of up to seven years. It is important to ensure that this service is secured for the duration of the contract period.
- 3.8 It is therefore proposed that the staff commitment and the commitment to fund the streets-to-home service are together funded from the core budget. The corollary of this is that from 2022-23 onwards

homelessness prevention grants will be funded from the annual government homelessness prevention grant.

- 3.9 The risk that the annual government homelessness prevention grant may not be made (and it not be possible to continue to make annual grant to agencies) is vanishingly small. This government grant (in its various iterations) has been made available to the Council in steadily-increasing amounts for in excess of two decades, rising, for example, from £558,640 in 2020-21 to £676,841 for 2022-23 plus a supplement of £141,918 to help prevent private rented sector homelessness.

4. Implications

a) Financial Implications

As set out in Section 3 above.

b) Staffing Implications

As set out in Section 3 above.

c) Equality and Poverty Implications

Please see the accompanying EqIA .

d) Net Zero Carbon, Climate Change and Environmental Implications

No positive or negative impact identified as the services recommended for grant aid are broadly similar to those supported in former years.

e) Procurement Implications

None

f) Community Safety Implications

None

5. Consultation and communication considerations

Consultation has been carried out with the Executive Councillor, the Head of Housing and the Assistant Head of Business and Finance Management. In addition, extensive consultation was carried out with partners, service users and others in the formulation of the new Streets to Home service.

6. Background papers

No background papers were used in the preparation of this report.

7. Appendices

Appendix 1: Summary of award recommendations

8. Inspection of papers

If you have a query on the report please contact James McWilliams, Housing Services Manager - Housing Advice. Tel: 01223 457813. Email: james.mcwilliams@cambridge.gov.uk.

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Cambridge City Council Equality Impact Assessment (EqIA)

This tool helps the Council ensure that we fulfil legal obligations of the [Public Sector Equality Duty](#) to have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (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.

Guidance on how to complete this tool can be found on the Cambridge City Council intranet. For specific questions on the tool email Helen Crowther, Equality and Anti-Poverty Officer at equalities@cambridge.gov.uk or phone 01223 457046.

Once you have drafted the EqIA please send this to equalities@cambridge.gov.uk for checking. For advice on consulting on equality impacts, please contact Graham Saint, Strategy Officer, (graham.saint@cambridge.gov.uk or 01223 457044).

1. Title of strategy, policy, plan, project, contract or major change to your service
Homelessness Prevention Grants to Agencies 2022-23

2. Webpage link to full details of the strategy, policy, plan, project, contract or major change to your service (if available)
Each year an invitation to organisations to apply for homelessness prevention grants is posted here .

3. What is the objective or purpose of your strategy, policy, plan, project, contract or major change to your service?
To invite and assess applications for grants to help prevent homelessness and rough sleeping, and make grant awards. The report also recommends a change to the source of grant funding.

4. Responsible service
Customer and Community Services / Housing Services

5. Who will be affected by this strategy, policy, plan, project, contract or major change to your service? (Please tick all that apply)	<input checked="" type="checkbox"/> Residents <input type="checkbox"/> Visitors <input type="checkbox"/> Staff
<p>Please state any specific client group or groups (e.g. City Council tenants, tourists, people who work in the city but do not live here):</p> <p>People who are homeless, threatened with homelessness, have a history of homelessness or who are sleeping rough.</p>	
6. What type of strategy, policy, plan, project, contract or major change to your service is this?	<input type="checkbox"/> New <input type="checkbox"/> Major change <input checked="" type="checkbox"/> Minor change
7. Are other departments or partners involved in delivering this strategy, policy, plan, project, contract or major change to your service? (Please tick)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>If 'Yes' please provide details below:</p> <p>This grant programme is administered jointly between Housing Services and Community Development.</p>	
8. Has the report on your strategy, policy, plan, project, contract or major change to your service gone to Committee? If so, which one?	
<p>Will be considered by Housing Scrutiny Committee on 20 January 2022.</p>	
9. What research methods/ evidence have you used in order to identify equality impacts of your strategy, policy, plan, project, contract or major change to your service?	
<p>A public invitation to bid for grant funding is issued, and any organisation assisting homeless people may apply. Awards are made on the basis of the published criteria, one element of which is to identify the need for the service and the particular needs of the client group the service is aimed at, for example, young people or women. Organisations are expected to provide evidence of need for the service as part of the bidding process. All bidding organisations must be able to demonstrate compliance with the Equality Act 2010. Successful applicants must provide quarterly monitoring reports which must include evidence of Equality Act compliance and impacts.</p>	

10. Potential impacts

For each category below, please explain if the strategy, policy, plan, project, contract or major change to your service could have a positive/ negative impact or no impact. Where an impact has been identified, please explain what it is. Consider impacts on service users, visitors and staff members separately.

(a) Age - Please also consider any safeguarding issues for children and adults at risk

As mentioned, bids for funding are invited from organisations providing services to all sections of the community, and a range of age groups. For 2022-23 several grants are recommended for approval that address age-related homelessness, as follows:

- Cambridge Cyrenians - Housing Related Support - Older People Homeless Floating Support Service (over 50s);
- CHS Group - Young Parent Project (YPP)
- Centre 33 - Homeless & Housing Service for young people under 25 years.

(A description of these and other services can be found at Appendix 1).

(b) Disability

Projects submitting funding requests support vulnerable people, and very often that vulnerability relates to mental or physical ill-health (even if these needs are not the primary focus of the service or project). The distribution of funding therefore has a positive impact on people with the protected characteristic of disability who are homeless or vulnerably housed. The grant proposed to be awarded to the Counting Every Adult service is to be singled out as a service-user-led project exemplifying how these grants can make a positive impact on the lives of people suffering trauma and poor mental health.

(A description of this service can be found at Appendix 1)

(c) Gender reassignment

There have been no funding requests in the current round from groups specialising in the needs of people who are undergoing (or have undergone) gender reassignment. However, as part of the grant monitoring process, the City Council ensures that all grant recipients offer equal services to all those in need of those services. The grant distribution process therefore ensures that there is no negative impact on persons who are undergoing (or have undergone) gender reassignment.

(d) Marriage and civil partnership

No negative or positive impacts identified.

(e) Pregnancy and maternity

In 2022 the proposed grant awards to projects specialising in the needs of pregnant women and mothers include the following:

- CHS Group - Young Parent Project
- Cambridge Women's Aid

(A description of these and other services can be found at Appendix 1).

No negative impacts have been identified.

(f) Race – Note that the protected characteristic 'race' refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

A small positive impact is identified (and intentional where it exists) in that grants made to charitable organisations may be used to assist individuals not otherwise eligible for public funds (people with 'no recourse to public funds' due to their immigration status). An example of this is the proposed grant to Cambridgeshire Community Foundation to pay for that organisation's administration of the Street Aid scheme (see: [Cambridge Street Aid - Cambridgeshire Community Foundation \(cambscf.org.uk\)](https://cambscf.org.uk)).

(g) Religion or belief

No positive or negative impacts identified.

(h) Sex

A deliberate overall positive impact on the basis of sex is identified in the proposed award of the largest single grant to Cambridge Women's Aid. This reflects the greater likelihood that women will experience domestic abuse (see: [What is domestic abuse? - Womens Aid](#)), which is a common reason for women's homelessness. A person at risk of violence or domestic abuse is automatically homeless, regardless of availability and legal rights to occupy accommodation, and is automatically

in priority need (see: [Shelter Legal England - Homelessness due to violence or domestic abuse - Shelter England](#)).

(i) Sexual orientation

No negative or positive impact identified.

(j) Other factors that may lead to inequality – in particular, please consider the impact of any changes on:

- Low-income groups or those experiencing the impacts of poverty
- Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage. (Here you are being asked to consider intersectionality, and for more information see: https://media.ed.ac.uk/media/1_159kt25q).

Low-income groups or those experiencing the impacts of poverty

The overwhelming single characteristic of people presenting to the housing advice service is their relative poverty. For example, in a recent audit more than nine out of ten people seeking housing advice were either unemployed or working fewer than 16 hours a week. Homelessness is causally-related to poverty, and grants made to prevent or relieve homelessness must evidence, directly or indirectly, that they make a proportionate and value-for-money positive impact on alleviating poverty or the consequences of poverty.

Groups who have more than one protected characteristic that taken together create overlapping and interdependent systems of discrimination or disadvantage:

People experiencing homelessness often have overlapping disadvantages and/or vulnerabilities, associated with or caused by inequality they experience related to their protected characteristics. For instance, many homeless people have physical and mental health issues. Also, ethnic minority people, women, and disabled people (and especially people from two or more of these three groups) are more likely to experience poverty in the first place that can lead to homelessness or risk of homelessness.

11. Action plan – New equality impacts will be identified in different stages throughout the planning and implementation stages of changes to your strategy, policy, plan, project, contract or major change to your service. How will you monitor these going forward? Also, how will you ensure that any potential negative impacts of the changes will be mitigated? (Please include dates where possible for when you will update this EqlA accordingly.)

Each organisation will submit quarterly monitoring reports, which includes an account of impacts on equality groups

12. Do you have any additional comments?

No

13. Sign off

Name and job title of lead officer for this equality impact assessment: James McWilliams, Housing Advice Service Manager

Names and job titles of other assessment team members and people consulted: Jackie Hanson, Community Funding & Development Manager; David Greening, Head of Housing; Mike Todd-Jones, Executive Councillor for Housing; Helen Crowther, Equality and Anti-Poverty Officer.

Date of EqlA sign off: 05/01/2022

Date of next review of the equalities impact assessment: 01/01/2023

Date to be published on Cambridge City Council website: 05/01/2022

All EqlAs need to be sent to Helen Crowther, Equality and Anti-Poverty Officer at helen.crowther@cambridge.gov.uk.