

CABINET

19 February 2024

Title: Innovative Sites Programme	
Report of the Cabinet Member for Regeneration and Economic Development	
Open Report with Exempt Appendix 1 (relevant legislation: paragraph 3 of Part I of Schedule 12A of the Local Government Act 1972 as amended)	For Decision
Wards Affected: All	Key Decision: Yes
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Accountable Director: Carolne Harper, Deputy Managing Director, Be First	
Accountable Executive Team Director: James Coulstock, Strategic Director Inclusive Growth	
Summary This report offers a status update on the Innovative Sites Programme (ISP), providing a summary of completed tasks, the strategy employed for site disposals and an update on financial implications. Given insights gained from stakeholder and industry engagement, along with evolving considerations regarding the leasehold sale of houses, the report proposes amendments to certain approvals granted in connection to the “Housing Innovation Programme – Small Sites” report approved by Cabinet on 16 June 2020 (Minute 10).	
Recommendation(s) The Cabinet is recommended to: (i) Approve the freehold disposal of sites within Workstream 1 of the Innovative Sites Programme, as listed under paragraph 1.14 of the report; (ii) Delegate authority to the Strategic Director of Inclusive Growth to approve the inclusion (or exclusion) of sites to the ISP and allocations to the three ISP workstreams, acting on the advice of the Council’s Assets and Capital Board; (iii) Delegate authority to the Strategic Director, Inclusive Growth, in consultation with the Cabinet Member for Regeneration and Economic Development, to approve the assessment criteria for schemes put forward by external organisations / groups; (iv) Delegate authority to the Strategic Director, Resources, acting on the advice of the Assets and Capital Board, to approve final land values and disposals; and	

- (v) Delegate authority to the Head of Legal, in consultation with the Strategic Director, Inclusive Growth, to execute all the legal agreements, contracts, and other documents on behalf of the Council in order to implement the proposals.

Reason(s)

The recommendations aim to enhance the effectiveness of the ISP disposal workstream. They seek to optimise sales potential and enhance the appeal of disposal sites to the market by proposing freehold disposal while promoting the delivery of high-quality homes. Additionally, these recommendations outline an updated governance strategy, ensuring the efficient implementation of the ISP.

The aims of the programme are aligned to the Council's priorities relating to inclusive growth, participation and engagement, prevention, independence, and resilience as set out in the Corporate Plan.

1. Introduction and Background

- 1.1 The Innovative Sites Programme (ISP) was initiated by LBBD in 2019 as a parallel to Be First's direct delivery programme of larger projects. The programme consists of sites ranging in scale from 0.02 hectares up to 0.3 hectares.
- 1.2 The objectives of the ISP were formalised in the "Housing Innovation Programme – Small Sites" report to Cabinet on 16 June 2020 (Minute 10 refers). Cabinet approved the programme to focus on three areas:
- i. Innovative and specialist housing meeting particular housing needs (such as the housing needs of vulnerable groups), with this likely funded through the Housing Revenue Account (HRA) subject to the relevant approvals;
 - ii. Community participation and engagement, including the facilitation of community led housing;
 - iii. Innovate housing design/delivery methods such as modern methods of construction (MMC) and innovations in building sustainability.
- 1.3 Cabinet approved two methods of delivery for the ISP via:
- i. Be First's direct delivery programme with funding via the General Fund or HRA;
 - ii. Third parties such as small builders, community groups or small and specialist Housing Associations. As a recipient of the Small Sites Small Builders (SSSB) grant from the GLA, LBBD is committed to using the GLA's competitive disposal service via its Small Sites Small Builders portal. This service combines some of the conveniences of land auctions with the delivery and quality control of development agreements. Using the GLA's disposal service, Be First, acting on behalf of LBBD, will welcome bids from SME developers and builders capable of building high quality homes with innovative solutions for complex sites.

- 1.4 In response to the objectives of the 2020 report, the ISP has been divided into three workstreams:
1. Disposal for small builders;
 2. Disposal for community led housing; and,
 3. Council-led non-general needs housing.
- 1.5 The objective of Workstream 1 is to dispose of LBBB owned sites to SME developers for the delivery of housing for local people. SMEs have the resource and capabilities to invest in and deliver small sites in innovative ways that would typically not be economical for Be First to deliver. In support of SME delivery, Be First successfully applied for two grants from the GLA's (SSSB) programme. The first grant was approved in February 2020 for £173,037.80 and the second in December 2020 for £292,875.50. The grants funded due diligence surveys and reports on several sites which help to de-risk the sites. Receiving the grants committed LBBB to using the GLA's SSSB portal to dispose the sites; failure to bring grant funded sites through the GLA's portal will require LBBB to repay grants back to the GLA. In addition to due diligence work, Be First has undertaken feasibility studies, conducted soft market testing, and engaged with industry experts, ward councillors and LBBB stakeholders. In anticipation of approvals of the recommendations made in this report, Be First will commence marketing of the first tranche of sites via the GLA's portal and other local channels.
- 1.6 The objective of Workstream 2 is to dispose of LBBB owned sites for community led housing, specifically for the benefit of groups based in Barking and Dagenham or the surrounding areas. In 2021, Be First successfully applied for a grant of £895,000 from the One Public Estate 9 Brownfield Land Release Fund – Self & Custom Build (SCB2). The grant covers capital costs of servicing sites with utilities, remediation, decontamination and other site enabling works. It is proposed that LBBB passes the grant to the successful bidders for the sites. To date, Be First has undertaken feasibility studies and engagement with industry experts, ward councillors, and LBBB stakeholders. The next phase of work under this workstream will involve community engagement and capacity building.
- 1.7 The objective of Workstream 3 is to facilitate Be First delivery of non-general needs housing on behalf of the council to help address growing need for specialist housing. To date, LBBB has funded a study on homes for care leavers and Be First has conducted feasibility studies for the sites. Be First successfully applied for a grant of £41,160 through the GLA's 2023 SSSB round 2 funding to undertake a study on the use of MMC on small sites. In collaboration with LBBB stakeholders, further work is required to inform project briefs as well as the design and viability of potential projects under Workstream 3.

ISP sites and estimated housing capacities

- 1.8 The 2020 Cabinet report listed an initial five sites for the ISP and made provision for the inclusion or exclusion of sites. Through recommendations by key LBBB stakeholders and upon review of sites identified under previous small site initiatives, Be First compiled a master list of 88 council owned small sites for consideration for the ISP.

- 1.9 Following a review and analysis of all 88 sites, Be First made recommendations to include 29 of the sites within the ISP. These sites were assessed as the most viable for the three workstreams based on for their suitability to deliver the programme objectives, estimated land values, site capacity and a review of site constraints. The 29 sites were selected in consultation with My Place, Ward Councillors, Inclusive Growth and the Portfolio holder for Regeneration and Economic Development. Site visits and due diligence work were undertaken to inform site allocations into the three ISP workstreams.
- 1.10 The ISP will be delivered in a phased approach to ensure adequate resourcing while providing opportunity to learn from previous phases and implement changes where needed.
- 1.11 Workstream 1 has a total allocation of thirteen sites to be systematically disposed of in three phases through the GLA's portal. As the first recipient of external funding and owing to funding commitments, this is the most progressed workstream. Further details about the first tranche of disposals (Workstream 1 Tranche 1) are presented in paragraph 1.15 below.
- 1.12 Workstream 2 has a total allocation of four sites to be disposed in a phased approach across two tranches via the GLA's small sites portal. These sites were assessed for their capacity to deliver homes for a small community or group of people.
- 1.13 Workstream 3 has a total allocation of twelve sites. These sites were assessed for their suitability to deliver homes for various vulnerable groups.
- 1.14 The table below illustrates sites earmarked for the ISP. With the exception of Workstream 1 Tranche 1, further consultation with LBBB stakeholders and ward councillors is required to ensure agreement with the inclusion of sites and delivery strategies.

No	Address	Tranche	Site Type	Est Housing capacity
Workstream 1				
1	Goresbrook Road	1	Infill	2
2	Becontree Avenue	2	Infill	3
3	57 Davington Road	2	Infill	1
4	Keir Hardie Way	1	Garage	9
5	Farmbridge Road East	1	Garage	3
6	Farmbridge Road West	1	Garage	3
7	Castle Road West	2	Garage	1
8	Castle Road East	2	Garage	1
9	Bull Lane	3	Garage	1
10	Wren Road	3	Garage	3
11	Highland Avenue	1	Garage	2
12	Hooks Hall Drive	2	Garage	4
13	East Road	3	Garage	4
				TOTAL UNITS: 37

Workstream 2				
14	Rosslyn Avenue	1	Garage	12
15	Chelmer Crescent	1	Garage	12
16	Hunters Hall Road	1	Garage	16
17	Roosevelt Way	2	Garage	12
				TOTAL UNITS: 52
Workstream 3				
18	Vicars Walk	tbc	Garage	1
19	Stone Close West	tbc	Garage	1
20	Stone Close East	tbc	Garage	2
21	Forsters Road	tbc	Garage	13
22	Beamway	tbc	Garage	5
23	Hollidge Way North	tbc	Garage	2
24	Hollidge Way South	tbc	Garage	2
25	Claridge Road West	tbc	Garage	1
26	Claridge Road East	tbc	Garage	1
27	Lansbury Avenue	tbc	Garage	10
28	Margaret Bondfield Avenue	tbc	Garage	8
29	John Burns Drive	tbc	Garage	21
				TOTAL UNITS: 66

Workstream 1 Tranche 1

- 1.15 The Workstream 1 Tranche 1 site disposal strategy has been taken through the Be First Gateway 2 process in consultation with Inclusive Growth, RDWG, ACB and IP.
- 1.16 Title reports and marketing material have been prepared for Workstream 1 Tranche 1 sites. Further consultation has been held with ward councillors who have demonstrated full support for disposal of the sites. Workstream 1 Tranche 1 sites are therefore ready to be marketed for disposal. This first tranche of disposals consists of five sites ranging in scale from 0.02 hectares to 0.17 hectares. An estimated total of 19 homes will be delivered across the five sites, many of which will be suitable for families.
- 1.17 As the other tranches and workstreams progress to Gateway 2, further consultation and due diligence will take place with the LBBD stakeholders, ward councillors and governance forums.
- 1.18 The table below presents the five Workstream 1 Tranche 1 sites and the estimated housing capacities.

No	Address	Site Type	Size (HA)	Unit Mix	Housing capacity
Workstream 1					
1	Goresbrook Road	Infill	0.02	3b6p	2
2	Keir Hardie Way	Garage	0.17	3b5p	9

3	Farmbridge Road East	Garage	0.06	3b6p	3
4	Farmbridge Road West	Garage	0.06	2b4p	3
5	Highland Avenue	Garage	0.06	3b6p	2
					TOTAL UNITS: 19

2. Proposal and Issues

2.1 This report makes proposals to address five key matters relating to the disposal of sites within the ISP

1. Terms of disposal (freehold vs leasehold)
2. Assessment criteria for disposal bids
3. De-risking sites
4. Land value
5. Appropriation and disposal of HRA land

Terms of disposal

2.2 Since approval of the 2020 Housing Innovation Cabinet report, a significant amount of engagement with industry experts and key stakeholders has taken place regarding the ISP disposal workstreams. This has helped to shape the programme to best deliver the objectives of the Cabinet report. Lessons learnt have included a better understanding of key delivery constraints, uncertainties within the market and how they may impact the ISP.

2.3 The 2020 Housing Innovation Cabinet report approved leasehold disposal of 250 years. In November 2023, a leasehold and freehold reform Bill was presented to Parliament as part of the Government's 'Long-Term Plan for Housing'. One of the objectives of the Bill is to ban the sale of new leasehold houses so that, other than in exceptional circumstances, every new house in England and Wales will be freehold from the outset. The proposal to ban leasehold sale directly impacts the ISP as the existing approval is not in line with emerging national policy.

2.4 Research, stakeholder, and market engagement as part of the ISP has demonstrated that compared to leasehold disposal, freehold disposal would generate better capital receipts for LBBB and minimise administrative burdens. Additionally, freehold disposals will eliminate the need to negotiate complex lease terms and conditions, therefore streamlining the development process.

2.5 Since 2020, the construction industry and property market have experienced significant changes. Build costs are up 24% since 2020 according to BICS and interests rates are at a 15 year high of 5.25% compared to 0.1% in 2020. Industry engagement through the ISP has highlighted preference for freehold disposal in response to current market challenges.

2.6 Be First, in consultation with Inclusive Growth, recommends that freehold disposal will help ensure a balance of risk and reward to LBBB, make sites more attractive to the market, prevent under valuing of sites and provide more security to the end users and homeowners.

- 2.7 This report therefore seeks Cabinet approval for freehold sale. Options considered are presented in item 3 of this report.

Assessment Criteria for disposal bids

- 2.8 The 2020 Cabinet paper approved assessment criteria for schemes put forward by external organisations/groups. Through review of case studies of comparable programmes and consultation with industry experts, the assessment criteria are identified as an important tool to establishing the level of design quality the ISP seeks to facilitate. In light of this understanding and recognising the significant changes witnessed in the industry since 2020, it is deemed necessary to amend the criteria to enhance their robustness and better align them with the ISP objectives.
- 2.9 This paper therefore recommends delegated authority to the Strategic Director of Inclusive Growth to approve amendments to the assessment criteria.
- 2.10 Through this delegation, any changes required to the criteria for future tranches in light of lessons learnt from tranche 1 disposals can be consulted upon and approved.

De-risking ISP sites

- 2.11 ISP Workstream 1 sites have benefited from due diligence funded by the GLA's Small Sites Small Builders grant. As set out in the 2020 Housing Innovation Report, the GLA grant funding was used to undertake due diligence on ISP sites as a means of de-risking the sites. LBBD is obligated to dispose of grant funded sites via the GLA portal as a recipient of the GLA grant. Disposals within the ISP are subject to planning and finance.
- 2.12 As part of the due diligence process, the option to dispose of sites with planning approval was considered by Be First in consultation with LBBD. Whilst there would be some potential to further de-risk sites and increase value, the option of selling sites with planning permission was discounted because the resource needed to develop planning applications may not be covered by the increased land value.

Land value

- 2.13 Sites within the ISP are typically small, constrained, and tricky to deliver. Due to uncertainties with the residential land market and complex nature of the sites, assumptions on land value are a risk and can only be tested via the market. Final land values will therefore be determined through the bidding process. The estimated values have been modelled by the Be First Commercial Team with land values calculated based on a modified BCIS build cost adjusted to reflect site size – the values are set out in Appendix 1, which is in the exempt section of the agenda as it contains commercially confidential information (relevant legislation: paragraph 3 of Part I of Schedule 12A of the Local Government Act 1972) and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.. These values are conservative estimates and are subject to change according to land purchaser design proposals and other details of bids received.

Appropriation and disposal of HRA land

- 2.14 Workstream 1 sites are HRA lands. The 2020 Cabinet report gave approval for sites to be appropriated. Following recent consultation with the Interim Head of Finance and the Investment Fund Manager, the Council has requested that Workstream 1 sites should not be appropriated to the General Fund for disposal. Sites will therefore be disposed through the HRA and land receipts from sales will be returned directly to the HRA fund.
- 2.15 As the sites are HRA assets, any revenue generated from disposals will be owed to the HRA. The original proposal to appropriate sites would require an extra layer of administrative process to return Workstream 1 disposal revenue from the General Fund to the HRA. Keeping sites within the HRA has been considered the best option as it reduces the need for additional administrative processes and helps ensure revenue generated through the ISP is dedicated exclusively to housing-related expenses. Additionally, revenue generated from HRA disposals will help maintain the financial health of the HRA.
- 2.16 Be First fees associated with Workstream 1 will therefore be covered by the HRA fund. Further details on financial implications of the ISP to date are provided in section 5 of this report.

3. Options Appraisal

Approval for freehold disposal

- 3.1. In response to proposed national reforms to the leasehold system as well as industry preference, two disposal options have been considered by Be First in consultation with Inclusive Growth as follows:

Option 1 – do nothing (not recommended)

- 3.2. The ISP has successfully secured two rounds of grant funding from the GLA's Small Sites Small Builder's programme totalling £465,913.30. These grants have been used to fund due diligence works on ISP sites. The do-nothing option will require the return of grant funding to the GLA.

Option 2 – Follow previous approvals (not recommended)

- 3.3. The 2020 Housing Innovation Cabinet report gave approval for leasehold disposal of sites in this programme and recommended that this would typically be a 250-year leasehold. The do-nothing option will mean the ISP proceeds with leasehold disposal.
- 3.4. This option is not recommended as it is not in line with the direction of travel regarding leasehold reforms by national government which proposes a ban on the creation of new leasehold houses. The ban will ensure new houses are sold with freehold title except in exceptional circumstances.
- 3.5. This option is the least attractive to the industry and could result in a lack of interest in the programme and make the sites unviable.

Option 3 – Agree new recommendations (recommended)

- 3.6. Option 3 seeks the approval of the new recommendations made in this report as follows:
- (i) Approve the freehold disposal of sites within Workstream 1 the ISP.
 - (ii) Delegate authority to the Strategic Director, Inclusive Growth to approve the assessment criteria for schemes put forward by external organisations/groups.
- 3.7. This option will ensure new homes can be sold with freehold titles in line with the proposed leasehold and freehold reforms proposed by national government.
- 3.8. This option minimises administrative burdens on LBB, eliminates the need to negotiate complex lease terms and conditions and streamlines the development process.
- 3.9. This option will make sites more attractive to small scale builders and help make sites more viable for development.

4. Consultation

- 4.1 Consultation has taken place with Ward Members, My Place colleagues, HRA stakeholders, Inclusive Growth, the portfolio holder for Regeneration and Economic Development, ACB, IP, RDWG and SME Developers.
- 4.2 The proposals in this report were considered and endorsed by the Assets & Capital Board at its meeting on 10 January 2024.

5. Financial Implications

Implications completed by: Alison Gebbett, Capital Accountant and Alex Essilfie-Bondzie, Interim Head of Finance (My Place and Inclusive Growth)

- 5.1 This report proposes progressing Workstream 1 of the Innovative Sites Programme (ISP) which involves disposing of sites to small builders for development.
- 5.2 The sites captured in this report are currently held within the Housing Revenue Account (HRA) as non-dwelling sites. Based on the requirements of the Local Authorities (Capital Finance and Accounting) (England) Regulation 2003, capital receipts from the disposal of non-dwelling HRA sites can be retained in full by local authorities so long as they are used to fund affordable housing, regeneration projects or pay down debt. It is therefore unnecessary for the site to be appropriated from the HRA to the General Fund to enable their use for these purposes. The capital receipts expected from the project are expected to be offset by the disposal costs and other costs relating to the ISP workstreams.
- 5.3 Be First has incurred costs on the ISP to date of £150,000 with GLA grant able to cover £40,120 of this fee based on the restrictions on the grant. This leaves £109,880 to be funded from the HRA capital programme initially until reimbursed from the capital receipts from the site disposals. Other grants awarded to the scheme are all for specific activities aimed at de-risking the site and exclude Be First fees.

- 5.4 Be First fees in the next stages of the programme will be charged at the agreed Be First day rates and will be capped at 4.5% of the land sale of each site, including any overages, unless prior agreement is obtained. Fees will be charged at each gateway. If a project doesn't reach a gateway, the project will be closed, and fees settled. For the first tranche of Workstream 1 the fee to the Council is an estimated £33,750.
- 5.5 If a disposal fails after costs have been incurred then the HRA stands the risk of the cost being charged back to revenue as aborted costs because the expenditure would not represent an investment that enhance the values of the assets in question.
- 5.6 The ISP has received £465,913.30 in grant funding from the GLA's Small Sites Small Builders Programme (SSSB) to carry out due diligence on disposal sites. Under the grant terms, LBBB is required to market sites for disposal via the GLA portal. Failure to adhere to this requirement may lead to the clawback of the grant funding. Risk of clawback will be avoided providing sites are marketed as soon as possible.
- 5.7 Programme managers are expected to update and seek approval from Cabinet as work progresses on the future tranches of the workstreams in the ISP.

6. Legal Implications

Implications completed by: Dr Paul Feild, Principal Standards & Governance Lawyer

- 6.1 The general power of competence in section 1 of the Localism Act 2011 provides sufficient power for the Council to participate in the transactions and enter into the various proposed agreements, further support is available under Section 111 of the Local Government Act 1972 which enables the Council to do anything which is calculated to facilitate, or is conducive to or incidental to, the discharge of any of its functions, whether or not involving expenditure, borrowing or lending money, or the acquisition or disposal of any rights or property.
- 6.2 The Council participating in the proposals as a local authority is an emanation of the state, and as such the Council must comply with the Subsidy Control Act 2022. This means that local authorities cannot subsidise commercial undertakings or confer upon them an unfair economic advantage. The report does not identify any specific aspect of the proposed disposals detailed at other than as a commercial transaction and a valuation will be required. Being new legislation while guidance has been issued there is no case law yet established setting out the application in real circumstances.
- 6.3 The sites must be disposed in accordance with the Local Government Act 1972 Section 123 at best consideration. The proposal is through market bidding. Thought should be given to establishing a reserve value. Furthermore, appropriate due diligence should be carried out regarding title and that the necessary appropriation steps be carried out with each site as may be required. The final consideration value shall duly be credited to its former holding account be it the Housing Revenue Account or General Fund.

- 6.4 Given that the sites are within well-established developed locations it will be inevitable that there will be displacement of utilities and services such as electricity substation(s), gas and water mains, telecommunications cables etc plus changes to highways and facilities, which may necessitate leases, licenses and agreements for highway and diversions of sewers. These are already familiar matters in a development context to the Council and Be First, and should, if managed soundly, avoid seemingly lengthy and intractable issues. Early surveying and research of the site's history will minimise costs and risks of delays and ensure a credible valuation.
- 6.5 Potential risk arising include, but are not limited to, any third-party rights or restrictions or incumbrances which may frustrate or prevent the regeneration objectives and development of the land. In terms of environmental risks, caution must be exercised in that the sites may raise risks of land contamination and if so, any remedial action and the costs of such remediation would need to be factored into the feasibility and viability considerations. Specifically, there should be early due diligence before contractually committing earmarking sites for the construction of dwellings. So, there will need to be investigation into whether there is a risk of the presence of historical contamination, and that it is capable of being remedied. Such costs need to be factored into the valuation(s) to ensure it does not compromise the viability or design of any residential development.
- 6.6 In terms of persons who may be affected by the proposals it does not appear that any existing residents will be affected or displaced. So, the question of the proposals having any impact on any human rights. However, this must be kept under review.

7. Other Implications

- 7.1 **Risk Management** - Potential risks arising include, but are not limited to, any third-party rights or restrictions.
- i. Due to the small and challenging nature of the sites, there is a risk that some bidders may submit proposals under Be First's estimated valuation. To mitigate against this, estimated land have been calculated conservatively. In addition, no onerous covenants have been placed on the sites to help reduce any impacts on viability.
 - ii. There is a risk of receiving bids from developers who seek to landbank the sites to drive up future resale value. To mitigate against this, clawback clauses and milestone dates will be included within the draft heads of terms and embedded in the disposal agreement.
 - iii. The risk of poorly designed and constructed developments is mitigated through the use of robust assessment criteria for all bids received. Additionally, the condition of sale being subject to planning further incentivises prospective buyers to propose good quality developments
 - iv. The amount and duration of legal negotiations required for each site and preferred proposal is unknown and therefore the cost of legal fees associated with finalising the sale is unknown. LBBB will cover up to £1,500 of legal fees

per site from land sale receipts. Any additional legal fees associated with finalising the sale will be covered by the selected buyer.

- 7.2 **Contractual Issues** – All legal documentation will be reviewed and agreed with LBBB Legal
- 7.3 **Corporate Policy and Equality Impact** – An Equality Impact Assessment Screening Tool has been completed and is attached at Appendix 2. The aims and objectives of the Innovative Sites Programme seek to provide an inclusive and equitable alternative to standard models of housing for the benefit of local people. The process through which the programme is delivered provides various opportunities to positively impact residents of Barking and Dagenham including those within the protected characteristic groups.
- 7.4 **Health Issues** - The intention of supplying innovative housing for vulnerable groups will need to address specific access/design needs relating to health, ageing, and mental health needs and should be taken into consideration for approval of new sites. Whilst helpful to invite community groups to develop appropriate housing this would be well supported by a framework to ask key questions such as placement near safe and well-lit routes, as well as basic checks around on accessibility, heating, ventilation, overcrowding, affordability, noise. Additionally due consideration of any previous usage of sites that may pose ongoing health risks.

Public Background Papers Used in the Preparation of the Report: None

List of appendices:

- **Appendix 1** – Estimated Land Values (exempt document)
- **Appendix 2** – Equality Impact Assessment Screening Tool