



18 March 2021

## CABINET – 29 MARCH 2021

A meeting of Cabinet will be held at 5.30pm on Monday 29 March 2021 via Microsoft Teams.

*Members of the public may view the meeting via the livestream available on the Council's website.*

Mannie Ketley  
Executive Director

### A G E N D A PART 1 – PUBLIC BUSINESS

1. Minutes.

To confirm the minutes of the meeting held on 1 March 2021.

2. Apologies.

To receive apologies for absence from the meeting.

3. Declarations of Interest.

To receive declarations of –

(a) non-pecuniary interests as defined by the Council's Code of Conduct for Councillors;

(b) pecuniary interests as defined by the Council's Code of Conduct for Councillors; and

(c) notice under Section 106 Local Government Finance Act 1992 – non-payment of Community Charge or Council Tax.

***Note: Members are reminded that they should declare the existence and nature of their interests at the commencement of the meeting (or as soon as the interest becomes apparent). If that interest is a prejudicial interest, the Member must withdraw from the room unless one of the exceptions applies.***

***Membership of Warwickshire County Council or any Parish Council is classed as a non-pecuniary interest under the Code of Conduct. A Member does not need to declare this interest unless the Member chooses to speak on a matter relating to their membership. If the Member does not wish to speak on the matter, the Member may still vote on the matter without making a declaration.***

4. Question Time.

Notice of questions from the public should be delivered in writing, by fax or e-mail to the Executive Director at least three clear working days prior to the meeting (no later than Tuesday 23 March 2021).

**Growth and Investment Portfolio**

Nothing to report to this meeting.

**Corporate Resources Portfolio**

Nothing to report to this meeting.

**Communities and Homes Portfolio**

5. Local Lettings Plan - Midland Heart (Houlton).

**Environment and Public Realm Portfolio**

6. Litter in Rugby (report to follow).

**The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report**

Nothing to report to this meeting

7. Motion to Exclude the Public under Section 100(A)(4) of the Local Government Act 1972.

To consider the following resolution:

“under Section 100(A)(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of information defined in paragraphs 2 and 3 of Schedule 12A of the Act.”

**PART 2 – EXEMPT INFORMATION**

**Growth and Investment Portfolio**

1. Funding and Business Growth Officer (report to follow).

**Corporate Resources Portfolio**

2. Human Resources Management.

3. Project management posts (report to follow).

4. Property Repairs Team - Resourcing and Commercialisation.

**Communities and Homes Portfolio**

Nothing to report to this meeting.

## **Environment and Public Realm Portfolio**

Nothing to report to this meeting.

**The following item contains reports which are to be considered en bloc subject to any Portfolio Holder requesting discussion of an individual report**

Nothing to report to this meeting.

***Any additional papers for this meeting can be accessed via the website.***

The Reports of Officers are attached.

### **Membership of Cabinet:**

Councillors Lowe (Chairman), Mrs Crane, Poole, Roberts, Ms Robbins and Mrs Simpson-Vince.

### **CALL- IN PROCEDURES**

*Publication of the decisions made at this meeting will normally be within three working days of the decision. Each decision will come into force at the expiry of five working days after its publication. This does not apply to decisions made to take immediate effect. Call-in procedures are set out in detail in Standing Order 15 of Part 3c of the Constitution.*

***If you have any general queries with regard to this agenda please contact Claire Waleczek, Democratic Services Team Leader (01788 533524 or e-mail [claire.waleczek@rugby.gov.uk](mailto:claire.waleczek@rugby.gov.uk)). Any specific queries concerning reports should be directed to the listed contact officer.***

***AGENDA MANAGEMENT SHEET***

**Report Title:** Local Lettings Plan - Midland Heart (Houlton)

**Name of Committee:** Cabinet

**Date of Meeting:** 29 March 2021

**Report Director:** Head of Communities and Homes

**Portfolio:** Communities and Homes

**Ward Relevance:** Houlton

**Prior Consultation:** Midland Heart (Development and Lettings Teams)

**Contact Officer:** Michelle Dickson - Communities and Projects Manager tel: (01788) 533843 email: michelle.dickson@rugby.gov.uk

**Public or Private:** Public

**Report Subject to Call-In:** Yes

**Report En-Bloc:** No

**Forward Plan:** Yes

**Corporate Priorities:** This report relates to the following priority(ies):

**(CR) Corporate Resources**  To provide excellent, value for money services and sustainable growth

**(CH) Communities and Homes**  Achieve financial self-sufficiency by 2020

**(EPR) Environment and Public Realm**  Enable our residents to live healthy, independent lives

**(GI) Growth and Investment**  Optimise income and identify new revenue opportunities (CR)

Prioritise use of resources to meet changing customer needs and demands (CR)

Ensure that the council works efficiently and effectively (CR)

Ensure residents have a home that works for them and is affordable (CH)

Deliver digitally-enabled services that residents can access (CH)

Understand our communities and enable people to take an active part in them (CH)

Enhance our local, open spaces to make them places where people want to be (EPR)

- Continue to improve the efficiency of our waste and recycling services (EPR)
- Protect the public (EPR)
- Promote sustainable growth and economic prosperity (GI)
- Promote and grow Rugby's visitor economy with our partners (GI)
- Encourage healthy and active lifestyles to improve wellbeing within the borough (GI)
- This report does not specifically relate to any Council priorities but

**Statutory/Policy Background:** The development of Local Lettings Plans (LLP's) are endorsed by the Chartered Institute of Housing as *'being an important tool in response to specific local circumstances and are one of the main vehicles for local authorities and their partners to use flexibilities within the allocation process.'*

**Summary:** The report proposes a LLP for the social rented element of a new Midland Heart development of 143 affordable homes in Houlton. The purpose of the LLP is to ensure that the resulting community is a sustainable one and that homes are accessible to people in housing need at a time when the infrastructure in Houlton is not as developed as it will be in the future.

**Financial Implications:** There are no direct financial implications for the Council.

**Risk Management Implications:** The proposed LLP will ensure that there is a sustainable demand for the new homes, and to reassure Midland Heart of our commitment to working with them to create a successful community.

It will also give us influence over the allocation of homes. The alternative is that Midland Heart could instead elect to direct let the homes, potentially to households outside of the borough.

**Environmental Implications:** There are no environmental implications.

**Legal Implications:** The development of LLP's for first time lets on new developments and / or re-lets in a designated area is permitted under section 11.2 of the council's current Housing Allocations policy

**Equality and Diversity:**

An Equality Impact Assessment has been carried out – please see appendix 1.

**Options:**

Endorse the proposed LLP for the allocation of Midland Heart’s social-rented homes at Houlton, as outlined in 6.0. This will enable local housing needs to be met.

However, the final decision on this proposed approach being acceptable will be down to Midland Heart’s Operational Team as they are the investor and the risks in letting the properties lie with them. They have so far endorsed the proposed criterion but have yet to consider the proposed % split.

The alternative will be for Midland Heart to directly let the homes. This is permissible as they are not obliged to accept nominations via a S106 agreement due to these new homes being a windfall opportunity outside of the S106 requirements for the site. This would mean their selecting the eligibility criteria, which could potentially include offering the homes to people outside of the borough.

**Recommendation:**

1. The proposed criteria for the LLP, as detailed in section 6.0 of this report be agreed for formal consideration by Midland Heart; and

2. the Head of Communities and Homes be given delegated authority to agree future local lettings plans for new affordable housing schemes, in consultation with the Portfolio Holder for Communities and Homes, whilst demonstrating ongoing compliance with the Housing Allocations policy.

**Reasons for Recommendation:**

The proposed approach complies with the current Housing Allocations Policy and demonstrates a commitment to building successful communities whilst addressing local housing needs.

This gives reassurance to the investors (Midland Heart and Homes England) that the resulting homes will be let, at a time when the wider infrastructure of Houlton is yet to be fully established.

**Cabinet - 29 March 2021**

**Local Lettings Plan - Midland Heart (Houlton)**

**Public Report of the Head of Communities and Homes**

**Recommendation**

1. The proposed criteria for the LLP, as detailed in section 6.0 of this report be agreed for formal consideration by Midland Heart; and
2. the Head of Communities and Homes be given delegated authority to agree future local lettings plans for new affordable housing schemes, in consultation with the Portfolio Holder for Communities and Homes, whilst demonstrating ongoing compliance with the Housing Allocations policy.

**1.0 Introduction**

Midland Heart is now in contract with Countryside Homes to deliver 143 affordable homes (103 for social-rent and 40 for Shared-Ownership) in Houlton. These homes are in addition to those that will be delivered through S106 obligations and have attracted substantial investment from Homes England. The first tranche of these new homes is on target for delivery in Autumn 2021.

The letting of these new homes provides some challenges for the Council, both in terms of the need to build a sustainable community and in respect of the lettings process. This is mainly because, Houlton, currently does not benefit from the infrastructure that is associated with our more established communities. It also differs as it is being built back towards Rugby, whereas the more common model is for such urban extensions to build outwards, moving gradually further away from an established urban centre.

**2.0 The Housing Waiting List**

The Council currently operates a closed housing waiting list which permits only those households most in need to be registered, and therefore be considered for social housing. Demand for social housing in Rugby far exceeds the available supply.

As at the end of February 2021, there are currently 417 households registered on the housing waiting list, illustrated by priority banding in table 1, below:

<b>Banding</b>	<b>Number of applicants</b>
Band 1 + (cumulative urgent need)	5
Band 1 (urgent priority)	114
Band 2 (medium priority)	181
Band 3 (low priority)	102
Band 4 (over 60 with a desire to move)	0
Band 5 (Reserve / hard to let homes/Mutual Exchange)	15
<b>Total</b>	<b>417</b>

In addition to the 417 applications already registered, there are an additional 1,186 applications at various stages of being assessed for eligibility to join the waiting list. Within this there may be a small number of duplicate applications.

Tables 2 and 3, below, illustrate the potential impact of the increased demand when the new applications, yet to be registered, are considered. However, the following caveats need to be observed:

- it assumes that 100% of those yet to be registered will qualify to join the waiting list. This is unlikely, with experience suggesting that this would be more likely to be in the region of 90%
- The resulting bedroom requirements and bandings are the same % as those with current live applications

Table 2, below, illustrates the potential composition of the waiting list (by banding) when all applications are registered, in addition to the 417 which are currently live:

<b>Banding</b>	<b>Number of applicants</b>
Band 1 + (cumulative urgent need)	16
Band 1 (urgent priority)	433
Band 2 (medium priority)	705
Band 3 (low priority)	385
Band 4 (over 60 with a desire to move)	0
Band 5 (Reserve / hard to let homes/Mutual Exchange)	64
<b>Total</b>	<b>1,603</b>

Table 3, below, illustrates how the waiting list could look (by bedroom requirements) when all applications are registered, in addition to the 417 which are currently live:

<b>Bedroom requirements</b>	<b>Number of applicants</b>
1 Bedroom	866 (54%)
2 Bedrooms	257 (16%)
3 Bedrooms	208 (13%)
4 Bedrooms	160 (10%)
5 Bedrooms	80 (5%)
6 Bedrooms	32 (2%)
<b>Total</b>	<b>1,603</b>

#### **4.0 New affordable housing delivery issues**

The very limited land supply in the borough means that the bulk of affordable housing delivery is currently secured via S106 agreements. As urban Rugby grows, then new supply is often further away from the established urban centre. For those in affordable housing need, that attract sufficient priority to be admitted on to the waiting list, being offered a property further away from the urban centre brings about issues of their being potentially unable to access support services and networks.

The availability and affordability of transport is a potentially significant barrier to those in most urgent housing need. Very few applicants on the waiting list have access to a car as it is too far out of their financial reach. At present, there is no bus service to Houlton, with a single deck bus service due to be provided by the 300th occupation. At this time there are a few unknowns as to when this service will start, its frequency, the confirmed route(s) and how affordable it will be.

In addition, it is worth noting that Warwickshire County Council is refreshing its Local Transport Plan, with consultation with businesses and residents starting in January 2021, to inform an updated version, set to be published in 2022.

#### **5.0 Meeting Housing Need - Issues**

The current housing strategy aims to:

- help people to access a suitable, high quality home that meets their needs at a price they can afford
- make best use of the borough's current and planned housing supply

There are several issues to consider with the supply of so many homes, currently only accessible to those in most urgent housing need, in an area where the infrastructure is still under development, and is a few miles from the established urban centre:

- The most successful communities are sustainable ones, with a mix of households and incomes.
- Applicants will potentially be unable accept offers of properties in Houlton as they are too far out of town. In these circumstances, such an offer would be deemed unsuitable to reasonably meet the needs of the applicant and increase their potential to fall into housing crisis

Consideration should also be given to the relationship management with the Registered Provider's (RP), in terms of future developments and their investment decisions for Rugby. There is a risk that they will not take on new affordable housing opportunities in the borough if the restrictions on eligible applicants for vacancies will result in rental losses arising from voids. The potential impacts are:

- they choose to invest in other areas where this proves not to be an issue
- for windfall opportunities like this, they look to direct let properties, rather than taking nominations from our waiting list, reducing our potential to influence the allocation of homes, to meet local housing needs.

- In terms of S106 homes, the RP's are obliged to take nominations from the waiting list, usually 100% for initial lets. However, if they perceive this is a risk they will not make offers to developers to secure S106 properties in the first place.

## **6.0 Local Lettings Plan - Houlton**

A potential way to address the identified issues is to agree a LLP for the first tranche of lettings at Houlton, in agreement and in partnership with Midland Heart.

Such an approach can be viewed as a way of the council using its ability to facilitate and promote a successful and sustainable community.

The current Housing Allocations Policy (section 11.2) allows us to develop LLP's and effectively create a new banding, for the waiting list, specifically for this. In the case of the new homes at Houlton, it would be necessary to market the site to other, would be applicants, who are not currently on the waiting list.

This is not a trailblazing approach. It is one that has been advocated by the Chartered Institute of Housing since 2007. They define local lettings policies as:

*'being an important tool in response to specific local circumstances and are one of the main vehicles for local authorities and their partners to use flexibilities within the allocation process. Local lettings must not dominate the scheme at the expense of the reasonable preference categories, and if used their nature and scope must be published alongside the allocation scheme'*

*(Community Cohesion and Housing document: 2007).*

It is recommended that a LLP be along the lines of the four criterion illustrated below. However, the final say on this will be down to Midland Heart's Operational Team as they are the investor and the risks in letting the properties lie with them. They have so far agreed in principle the potential criterion but have yet to consider the proposed % splits:

### **Criterion 1:**

That 35% of lettings will be to those in gainful employment. Employment includes the following:

- a permanent employment contract
- a long-term temporary contract (more than 12 months)
- Self-employed for the last 12 months

The rationale for this proposal is that it would be a hand up to those in work. This is not something achieved by the traditional lettings approach, and is critical to helping achieve a more balanced and sustainable community.

### **Criterion 2:**

No more than 10% of households will have medical / welfare needs as categorised by the definition below:

- 10% - high medical / welfare needs – care programme and tenancy support services must be in place for at least 12 months
- 20% - medium medical / welfare needs – support from statutory and voluntary agencies, tenancy support in place but no formal programme
- 70% - low medical / welfare needs but able to live independently with some support, i.e tenancy support

The rationale for this proposal is that there is little infrastructure on site to support people with medical needs, and such needs are more effectively met in the established urban centre.

### **Criterion 3:**

That 35% of lettings be made available to households currently spending more than 25% of the net income on privately renting a property in Rugby, with additional preference for those renting a pre-1919 property with an Energy Performance Certificate (EPC) rating of E,F or G.

The rationale for this proposal is that this is the group most likely to fall into crisis due to high rents and energy bills. This approach could also be viewed as a move to being more pro-active in helping to prevent issues of homelessness arising in the borough.

### **Criterion 4:**

That 20% of lettings be made available to existing social housing tenants in Rugby that wish to upsize (subject to their being able to afford this) or downsize

The rationale for this proposal is to encourage churn within the existing housing stock, where households are more established and may aspire to living in Houlton. The resulting vacancies will then be let to applicants on the housing waiting list.

## **8.0 Benefits of Proposed Approach**

There are several benefits to the proposed approach:

- It links to the new corporate strategy and recovery plan: *ensure that residents of Rugby have access to high quality, affordable, and environmentally sustainable housing which is fit for purpose*
- It is an opportunity to assist those families who are just 'getting by' in the private-rented sector
- Families will enjoy more security of tenure than is offered by the private-rented sector. This brings with it the well-being benefits of continuity in both belonging in the community and the opportunity for children to see through their education in one setting

- New homes are far more thermally efficient and therefore comparably cheaper to heat, especially when compare to pre 1919 type properties which are most often of solid-wall construction
- The increased surplus household income can be reinvested back into the local economy
- This is an opportunity for the Council to be proactive in responding to impending homelessness rather than reactive
- There would be churn created in the current social housing stock
- The resulting new community will be more sustainable

## **9.0 Conclusion**

This is an opportunity to review our approach to letting properties in a location away from the urban centre, to be more responsive to the wider housing needs of people living in the borough.

As more development takes place on the urban fringes of the borough, as well as within the main rural settlements, this is an approach that will potentially have to be considered for future allocations on new developments, to ensure that they contribute to the housing needs of the borough.

Such an approach will also give RP's the assurance, in terms of sustainable demand, that they require to continue investing in new affordable housing for the borough.

**Name of Meeting:** Cabinet

**Date of Meeting:** 29 March 2021

**Subject Matter:** Local Lettings Plan - Midland Heart (Houlton)

**Originating Department:** Please select

**DO ANY BACKGROUND PAPERS APPLY**                       **YES**                       **NO**

**LIST OF BACKGROUND PAPERS**

<b>Doc No</b>	<b>Title of Document and Hyperlink</b>

The background papers relating to reports on planning applications and which are open to public inspection under Section 100D of the Local Government Act 1972, consist of the planning applications, referred to in the reports, and all written responses to consultations made by the Local Planning Authority, in connection with those applications.

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Exempt information is contained in the following documents:

<b>Doc No</b>	<b>Relevant Paragraph of Schedule 12A</b>

# EQUALITY IMPACT ASSESSMENT (EqIA)

## Context

1. The Public Sector Equality Duty as set out under section 149 of the Equality Act 2010 requires Rugby Borough Council when making decisions to have due regard to the following:
  - eliminating unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Act,
  - advancing equality of opportunity between people who share a protected characteristic and those who do not,
  - fostering good relations between people who share a protected characteristic and those who do not, including tackling prejudice and promoting understanding.
2. The characteristics protected by the Equality Act are:
  - age
  - disability
  - gender reassignment
  - marriage/civil partnership
  - pregnancy/maternity
  - race
  - religion/belief
  - sex/gender
  - sexual orientation
3. In addition to the above-protected characteristics, you should consider the crosscutting elements of the proposed policy, such as impact on social inequalities and impact on carers who look after older people or people with disabilities as part of this assessment.
4. The Equality Impact Assessment (EqIA) document is a tool that enables RBC to test and analyse the nature and impact of what it is currently doing or is planning to do in the future. It can be used flexibly for reviewing existing arrangements but in particular should enable identification where further consultation, engagement and data is required.
5. The questions will enable you to record your findings.
6. Where the EqIA relates to a continuing project, it must be reviewed and updated at each stage of the decision.
7. Once completed and signed off the EqIA will be published online.
8. An EqIA must accompany all **Key Decisions** and **Cabinet Reports**.
9. For further information, refer to the EqIA guidance for staff.
10. For advice and support, contact:  
Minakshee Patel  
Corporate Equality & Diversity Advisor  
[minakshee.patel@rugby.gov.uk](mailto:minakshee.patel@rugby.gov.uk)  
Tel: 01788 533509

## Equality Impact Assessment

<b>Service Area</b>	Communities and Homes
<b>Policy/Service being assessed</b>	Local lettings plan for Midland Heart social rented homes at Houlton
<b>Is this is a new or existing policy/service? If existing policy/service please state date of last assessment</b>	It is a new lettings plan, the development of which is permitted under section 11.2 of the Council's formally adopted Housing Allocations Policy.
<b>EqlA Review team – List of members</b>	Michelle Dickson Dave Wortley Minakshee Patel
<b>Date of this assessment</b>	February 2020
<b>Signature of responsible officer (to be signed after the EqlA has been completed)</b>	

**A copy of this Equality Impact Assessment report, including relevant data and information to be forwarded to the Corporate Equality & Diversity Advisor.**

**If you require help, advice and support to complete the forms, please contact Minakshee Patel, Corporate Equality & Diversity Advisor via email: [minakshee.patel@rugby.gov.uk](mailto:minakshee.patel@rugby.gov.uk) or 01788 533509**

**Details of Strategy/ Service/ Policy to be analysed**

<b><u>Stage 1 – Scoping and Defining</u></b>	
(1) Describe the main aims, objectives and purpose of the Strategy/Service/Policy (or decision)?	<p>To ensure that the new social rented homes secured by Midland Heart at Houlton are let in a way that contributes to:</p> <ul style="list-style-type: none"> <li>• meeting housing need</li> <li>• building a sustainable community</li> </ul> <p>A local lettings plan (the development of which is permitted under section 11.2 of the Council’s adopted housing allocations policy) only applies to the first lettings of new homes on a development. Subsequent re-lets will be made in the usual way.</p>
(2) How does it fit with Rugby Borough Council’s Corporate priorities and your service area priorities?	<p>Corporate priority - Enable our residents to live healthy, independent lives.</p> <p>Service priority – ensure residents have a home that works for them and is affordable</p>

(3) What are the expected outcomes you are hoping to achieve?

*1.0 Meeting a broader range of housing needs:*

Due to its closed nature the housing waiting list only takes account of those in most acute housing need.

The disadvantage to using the housing waiting list as the exclusive barometer of housing need is that it does not tell us the number of people on the periphery of a housing crisis and who are just getting by in the private-rented sector where there is no security of tenure and the issuing of Section 21 notices (no fault eviction notices) remains prevalent. By satisfying their own housing needs, no matter how tenuously, they do not qualify for the housing waiting list as their needs are essentially met.

*2.0 sustainable tenancies*

Many of those registered on the housing waiting list have both chaotic lifestyles and high support needs – often best reliant on services based in the centre of urban Rugby.

This would mean that any offer of a home in Houlton would potentially be both unreasonable and unsuitable in meeting their needs.

They are the least likely to have surplus income to own their own transport or to be able to afford public transport.

The way that Houlton is growing is the opposite to many traditional urban extensions which grow out from the existing urban centre. In the case of Houlton it is growing back towards Rugby, so the properties being built in the early phases are in effect the furthest out from the urban centre of Rugby.

The infrastructure at Houlton is increasing but there is currently no single-decker bus service (a S106 requirement upon occupation of the 300<sup>th</sup> property) and no-where to buy basic groceries and provisions. However, a new Co-Op is being built which will open in late 2021.

*3.0 A sustainable community*

In terms of building sustainable communities, it is inadvisable to cluster people in acute housing need in one area, particularly when not supported by a robust infrastructure.

	<p>In summary, whilst the new affordable homes are welcome, they are probably not best suited to those in the higher priority categories of the housing waiting list. We would struggle to meet the threshold for suitability when offering a new home.</p> <p>However, in subsequent re-lets when the infrastructure provision increases and Houlton becomes more established as part of mainstream Rugby, the suitability argument will diminish.</p> <p><i>4.0 Meeting our obligations in respect of nominations</i></p> <p>A lettings plan will ensure that Midland Heart can let their properties and we can meet our obligations in respect of nomination of prospective tenants to Midland Heart. This is a critical part of the relationship management with our Registered Provider partners.</p> <p>On this basis, an alternative means of letting would be justified if the council is to take advantage of its opportunity to influence who is housed on site and ensure that they are set up with the best chance to succeed in their new tenancy.</p>
<p>(4) Does or will the policy or decision affect:</p> <ul style="list-style-type: none"> <li>• Customers</li> <li>• Employees</li> <li>• Wider community or groups</li> </ul>	<p>Customers – those on the waiting list and those that we propose to be eligible to join the waiting list to be considered for the new homes.</p>
<p><b><u>Stage 2 - Information Gathering</u></b></p>	<p>As a minimum you must consider what is known about the population likely to be affected which will support your understanding of the impact of the policy, eg service uptake/usage, customer satisfaction surveys, staffing data, performance data, research information (national, regional and local data sources).</p>

Appendix 1

<p>(1) What does the information tell you about those groups identified?</p>	<p>We already know that the people on our housing waiting list are in housing need and often require support services only accessible to them in urban Rugby.</p> <p>In the last quarter, the top three reasons that people have sought the advice of CAST in respect of homelessness assistance and advice are:</p> <ul style="list-style-type: none"> <li>• Those who are having their private-rented tenancy ended</li> <li>• Family no longer willing to accommodate them</li> <li>• Domestic abuse</li> </ul> <p>In terms of the standard waiting list, the most common reasons for applicants to be registered on there is for reasons of</p> <ul style="list-style-type: none"> <li>• overcrowding</li> <li>• medical</li> <li>• Welfare / hardship</li> </ul>
<p>(2) Have you consulted or involved those groups that are likely to be affected by the strategy/ service/policy you want to implement? If yes, what were their views and how have their views influenced your decision?</p>	<p>Not directly. However, we have used our understanding of the issues that our customers approach us with to inform recommendations for how these properties should be let, in the first instance.</p>
<p>(3) If you have not consulted or engaged with communities that are likely to be affected by the policy or decision, give details about when you intend to carry out consultation or provide reasons for why you feel this is not necessary.</p>	<p>This is not necessary. This is about opening up opportunities to people that would not normally have access to social housing. The people on the housing waiting list are not going to be disadvantaged for the reasons outlined in Section 3 of Stage 1</p>
<p><b>Stage 3 – Analysis of impact</b></p>	

Appendix 1

<p><u>(1)Protected Characteristics</u> From your data and consultations is there any positive, adverse or negative impact identified for any particular group, which could amount to discrimination?</p>	<p><b>RACE</b></p> <p>N</p>	<p><b>DISABILITY</b></p> <p>Y</p>	<p><b>GENDER</b></p> <p>N</p>
	<p><b>MARRIAGE/CIVIL PARTNERSHIP</b></p> <p>N</p>	<p><b>AGE</b></p> <p>Y</p>	<p><b>GENDER REASSIGNMENT</b></p> <p>N</p>
	<p><b>RELIGION/BELIEF</b></p> <p>N</p>	<p><b>PREGNANCY MATERNITY</b></p> <p>N</p>	<p><b>SEXUAL ORIENTATION</b></p> <p>N</p>
<p>If yes, identify the groups and how they are affected.</p>	<p><i>Disability:</i></p> <p>No more than 10% of households will have medical / welfare needs as categorised by the definition below:</p> <p>10% - high medical / welfare needs – care programme and tenancy support services must be in place for at least 12 months</p> <p>20% - medium medical / welfare needs – support from statutory and voluntary agencies, tenancy support in place but no formal programme</p> <p>70% - low medical / welfare needs but able to live independently with some support, i.e. tenancy support</p> <p>This is evidence that we are trying to ensure provision to meet the needs of this group. However, in the interest of achieving a balanced and sustainable community, in an environment where the social infrastructure is currently lacking then this needs to be balanced. There is a relative over provision of sheltered accommodation in urban Rugby this is also potentially well-suited to meeting this need, which is well established and in close proximity to health and support services.</p>		

	<p><i>Age:</i></p> <p>We are proposing to make a 20% of the properties available for existing social housing tenants that want the opportunity to upsize or downsize. The current offer for older people to downsize from under-occupied larger social housing is limited to Independent Living accommodation, but there will potentially be a wider offer at Houlton which may prove potentially more attractive. The resulting churn in larger properties can then be put to best effect to help out families on the Council's Housing Waiting List.</p>
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Appendix 1

(2) Cross cutting themes

(a) Are your proposals likely to impact on social inequalities e.g. child poverty, geographically disadvantaged communities? If yes, please explain how?

(b) Are your proposals likely to impact on a carer who looks after older people or people with disabilities? If yes, please explain how?

(a) 35% of lettings be made available to households currently spending more than 25% of the net income on privately renting a property in Rugby, with additional preference for those renting a pre 1919 property with a EPC rating of E,F or G.

This is intended to help families who are just getting by in the private rented sector. As seen by the most common presentations for homelessness advice, it is this category of household that is most likely to seek homelessness advice, and where there are children there is an increased likelihood that we have a statutory duty to assist them. By opening up the potential opportunities for them to access social housing, with the associated security of tenure we are positively assisting less well-off families, and responding pro-actively rather than reactively.

Currently, people that are in less acute housing need are unable to access the waiting list, for example those that are working and therefore potentially have the means to privately rent a home. The unintended consequence of this is that there are limited opportunities for working people to access affordable homes. Houlton, by virtue of its location, the number of homes that Midland Heart are delivering on site, the lack of current infrastructure means that a more creative approach is needed to ensure both the lettings are achievable and that the new community being established is a sustainable one. For this reason, it is proposed to that the local lettings plan will permit the allocation of 35% of the social rented homes to people in gainful employment, defined as:

- a permanent employment contract
- a long-term temporary contract (more than 12 months)
- self-employed for the last 12 months

(3) If there is an adverse impact, can this be justified?

There are no adverse impacts. Those in the most urgent housing need are not going to be able to access these properties, due to them being deemed unsuitable to meet the needs of this client group.

Appendix 1

(4)What actions are going to be taken to reduce or eliminate negative or adverse impact? (this should form part of your action plan under Stage 4.)	These proposals apply to initial lettings only.
(5) How does the strategy/service/policy contribute to the promotion of equality? If not what can be done?	It is a reasoned approach to ensuring that we meet a broader range of housing needs to create a balanced and sustainable community.
(6) How does the strategy/service/policy promote good relations between groups? If not what can be done?	The transparency of the allocations process will assist in this.
(7) Are there any obvious barriers to accessing the service? If yes how can they be overcome?	These proposals are all about improving access to affordable housing.

**Stage 4 – Action Planning, Review & Monitoring**

If No Further Action is required then go to – Review & Monitoring

(1)Action Planning – Specify any changes or improvements that can be made to the service or policy to mitigate or eradicate negative or adverse impact on specific groups, including resource implications.

EqlA Action Plan

Action	Lead Officer	Date for completion	Resource requirements	Comments



(2) Review and Monitoring  
State how and when you will monitor policy  
and Action Plan

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Please annotate your policy with the following statement:

**'An Equality Impact Assessment on this policy was undertaken on (date of assessment) and will be reviewed on (insert review date).'**