

REPORT TO COMMUNITIES AND GROWTH PDGs

REPORT OF: Executive Manager Development and Growth

REPORT NO: SEG 40

DATE: 23rd March 2017 and 30th March 2017

TITLE:	The Government's Housing White Paper 2017	
KEY DECISION OR POLICY FRAMEWORK PROPOSAL:		
EXECUTIVE MEMBER0: NAME AND DESIGNATION:	Councillor Linda Wootten Executive Member Housing	
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INITIAL IMPACT ANALYSIS: Equality and Diversity	Not required	
FREEDOM OF INFORMATION ACT:	This report is publicly available via the Your Council and Democracy link on the Council's website: www.southkesteven.gov.uk	
BACKGROUND PAPERS	The Housing White Paper, February 2017 https://www.gov.uk/government/collections/housing-white-paper	

1. RECOMMENDATIONS

1.1 That Members of the Communities and Growth PDGs:

- a) Recognise the work that is already progressing in respect of planning for sustainable housing delivery
- b) Provide feedback on the questions raised in this report to inform a response to the Housing White Paper, before the 2nd May deadline.

2. PURPOSE OF THE REPORT

- 2.1 To provide a summary of the contents of the Government's Housing White Paper (the White Paper).
- 2.2 To provide evidence of what the Council is already doing, in respect of the emerging policies within the White Paper.
- 2.3 To consider the emerging thoughts and ideas that have come from the recent Housing Summits, particularly in respect of whether they align with the emerging policies in the White Paper
- 2.4 To provide information relating to the content of the White Paper

3. DETAILS OF REPORT

An Overview

- 3.1 The purpose of the 2017 White Paper is to address the present blockages to housing supply. This problem is the basis of England's "broken housing market", leading to:
 - a) The inaccessibility of home ownership for young people;
 - b) Increasing rents in the private rented sector, linked with problems of exploitation and abuse of new and existing tenants, and
 - c) Negative economic impacts caused by the lack of affordable housing close to jobs, and the sub-optimal contribution of the construction sector.
- 3.2 The White Paper expresses the view that solutions to the housing supply problem are linked with an ability to deal with three problems:
 - a) 40% of local planning authorities (LPAs) do not have a plan that meets the projected growth in households in their area. According to the White Paper, one of the most significant reasons for this is the local response to public attitudes about new housing, leading to them 'ducking difficult decisions and not planning for the homes their area needs'.

The White Paper suggests that solutions lie in changes to the existing planning system (see detail below).

- b) The pace of development is too slow – more than a third of new homes that were granted planning permission between 2010/11 and 2015/16 have yet to be built. In the White Paper, the government recognises that there are many reasons for this – but that one may be speculation regarding a rise in land values.

The White Paper suggests that solutions once again lie in changes to the existing planning system and associated powers for local authorities to unblock stalled development (see detail below).

- c) The very structure of the housing market makes it hard to increase supply. The reference here is to the dominance of the market by 10 large housebuilding firms – together building around 60% of new private homes. Linked with this are the especially low productivity within the construction sector.

The White Paper suggests that solutions lie in the provision of support for housing associations to build more, options for LAs to build again, encouragement of institutional investment in the private rented sector and the promotion of more modular and factory built homes (see detail below).

The Response of the Sector

- 3.3 Much has been written, by the housing and development industries, about the content of the White Paper. The common view is that the White Paper is ‘more evolution than revolution’; consolidating and improving existing ideas rather than introducing new ones. Major and potentially controversial changes such as increasing flexibility on green belt land and enhanced rights for existing private renters have been resisted, as have possible measures to tackle land availability and pricing, and thereby land-banking. Despite encouraging councils to build, funding is not made available in pursuit of this objective (eg by relaxing borrowing rules or allowing local authorities to retain 100% of receipts from the sale of council houses).
- 3.4 Specific criticism has been levied at the White Paper for failing to address the “huge lack of retirement property in the UK” and for being insufficiently flexible in their definition of affordable rent (at 20% of market rent, as opposed to a relationship with income). Other observations relate to specific policy proposals. For example, the proposal to increase planning fees by 20% from July has been welcomed – but commentators argue that councils should have the ability to set fees to recover costs so that council taxpayers no longer subsidise planning.
- 3.5 Several housing association and local authority sector commentators have welcomed a return to a strategy that talks about homes for rent and for sale; that speaks of housing associations, local authorities and small to medium enterprises (SMEs) as key players and seeks to call to account those who fail to support development.

Developing an SK response

- 3.6 Government is presently consulting on the White Paper. It is doing so via 40 web-based questions linked to specific proposals within the document. It is important for local authorities to consider a formal Member-led response to this consultation.
- 3.7 In considering a response, it is important that we recognise – and highlight – the work that we are already doing in respect of our housing delivery agenda.

3.8 Our progress is set-out in the second column of the table below.

3.9 It is also important to consider how the policy ideas contained within the White Paper align with the emerging themes and ideas that have been developed through our recent Housing Summits. These summits have generated circa 250 comments, ideas and questions. However, until a new Housing Strategy has been agreed by Members later this year; the PDGs are asked to consider how much weight should be attributed to these ideas as a response to the Government's Housing White Paper is formed. Likewise, the emerging policies in the White Paper will influence the content of the Council's Housing Strategy.

3.10 The emerging ideas from the Housing Summits are captured in the third column of the table below.

4. **THE 2017 HOUSING WHITE PAPER: DETAILED POLICY PROPOSALS AND IMPLICATIONS FOR SOUTH KESTEVEN**

4.1 The following table contains a list of strategic issues and opportunities that are raised in the White Paper. The list is not comprehensive, and the questions set out in the fourth column are not the same questions that are set out in the Government's consultation.

4.2 Instead, the focus is on policy proposals that are (a) strategic and (b) are relevant to the South Kesteven context.

4.3 The table number column is shaded Yellow and Blue:

G	There are 10 questions that are considered to be most relevant to the Growth PDG
C	There are 8 questions that are considered to be most relevant to the Communities PDG

4.4 Members are asked to consider the questions in the table; focussing at first on those that are highlighted as being most relevant to their respective PDG.

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
1	Getting plans in place			
1.1	<p>Making sure every community has an up-to-date, sufficiently ambitious plan</p> <p>The SoS would require LPAs to review local plans and other local development documents at least once every five years.</p> <p>The present Duty to Co-operate would be strengthened: LPAs will be expected to prepare a Statement of Common Ground. The SoS would have power to direct a group of authorities to work together to produce a joint plan.</p>	<p>We currently have a Core Strategy and Sites and Allocations Policy which were adopted in 2010 and 2014 respectively. Our Local Plan is progressing towards submission later this year.</p> <p>We are working closely with all our neighbouring authorities, particularly Rutland, in respect of 'duty to cooperate' and do not currently for-see any issues which would require a strengthening of this approach.</p>		<p>(G1) The White Paper explains the Review from the perspective of updating the evidence-base and making parallel changes to the local plan and development documents. Do Members agree with this approach?</p>
1.2	<p>Making plans easier to produce</p> <p>Instead of having to produce a Local Plan, an LPA would be required to maintain a set of key strategic policies, with flexibility over whether a plan is produced for that LPA, or alternatively, for a group of authorities. In parallel with this, government will tighten the definition of what evidence is required to support a 'sound' plan.</p>	<p>Our Local Plan Review is progressing with a clear evidence base in support. We have taken advice from peers and independent experts who have advised on the extent of our evidence base in order to put us in the best possible position when we get to examination. Any clarification of the required evidence base would assist with</p>		

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
	Government are seeking views about the most appropriate and proportionate mechanisms for consultation and engagement.	<p>plan-making.</p> <p>Our current, and scheduled, engagement with members, stakeholders and residents and businesses is designed to ensure maximum possible awareness and understanding of the emerging plan.</p>	Members have expressed a preference for the use of a 'Summit' format to engage with local developers.	
1.3	<p>Assessing housing requirements</p> <p>Government proposes to introduce a more standardised/consistent approach to assessing housing requirements. From April 2018 the new methodology would apply as the baseline for assessing 5-year housing land supply and housing delivery, in the absence of an up-to-date plan.</p>	We currently have a 5.3 year supply of housing, and have always sought to ensure that the supply of housing is sufficient to meet local need. However, housing delivery has struggled due to factors that are clearly unrelated to the pure supply of housing land.	<p>Housing Need is a key theme in our Housing Summits, with specialist housing, creating quality places and non-traditional methods of delivery sub-themes within it.</p> <p>This area is a key theme in our emerging Housing Strategy, recognising our aging population and need for affordable 'extra care' developments.</p>	(C1) Special needs housing is a priority within SK. Is this new duty a sufficient response by government to the policy and financial issues underlying this priority?
1.3	LPA's will be expected to have clear policies for addressing the housing requirements of special needs groups.			
1.4	<p>Digital planning: making plans & proposals more accessible</p> <p>The government is considering opportunities to prescribe open data standards for local plans and</p>	We are currently reviewing the data which we hold and are considering how we might make		

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	use digital tools to support better plan-making.	it more accessible.		
1.5	<p>Making land ownership and interests more transparent</p> <p>The government is driving improvements to the Land Registry with a view to achieving transparency on land ownership and control. This work will assess how land and property data can be made more openly available to the benefit of developers, home buyers and others.</p> <p>It is also government's intention to improve the transparency of contractual arrangements used to control land.</p>	<p>We are working with the Land Registry to ensure that our data is fit for purpose.</p> <p>This is a known issue in the district, with key sites subject to legal agreements that aren't always easily accessible.</p>	<p>There have been suggestions through the Housing Summits that the Council should take a more proactive approach to land acquisition. In this respect; the more accessible and transparent the information available, the quicker and easier this process should be.</p>	
2	Making enough land available in the right places			
2.1	<p>The identification and use of suitable land and bringing brownfield land back into use</p> <p>LPAs would be required to demonstrate that they have a clear strategy to maximise the use of suitable land in their area so that it is clear how much development can be accommodated. Unless it can be justified for planning reasons, their identified housing</p>	<p>Our emerging Local Plan will contain policies to ensure the appropriate use of brownfield land, and we have already seen commissioned work n Grantham and Stamford help to support major sites coming forward primarily around the periphery of the settlements' edges.</p>	<p>There is a keenness to make the best use of all land that is available.</p>	

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	requirement should be accommodated. This is particularly the case for suitable brownfield land.			
2.2	<p>Improving local authorities' role in land assembly and disposal</p> <p>Government proposes that all LPAs can dispose of land with the benefit of planning consent which they have granted to themselves. This can be used to provide certainty for developers purchasing land from public bodies to develop new homes. Government recognise that the present requirement to dispose of publicly owned land for best considerations often delays disposals. They therefore propose to enable disposal by LPAs of such land for less than best consideration, up to a financial threshold.</p>	We have engaged with recent Government initiatives which seek to maximise the use of public land (such as the One Public Estate programme and the Accelerated Construction Initiative).	Through the Summits, there has been a keenness expressed for the Council to take a more proactive role in enabling development through the use of its assets (provided that those assets are not being fully utilised and are not considered to have more preferable use)	(G2) This power is presently unavailable to SKDC except in partnership with LCC. Would Members welcome this simplification? Might it make a difference to the Council in being proactive in developing public land?
2.3	<p>Regenerating housing estates</p> <p>LPAs will be encouraged to consider the social and economic benefits of estate regeneration when preparing plans and granting planning permission.</p>		The importance of 'place making', primarily through environmental improvements, has been recognised through the Housing Summits.	
2.4	<p>Supporting rural communities</p> <p>Complementing the presumption</p>	The emerging Local Plan will		

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	<p>for development on brownfield land, LPAs will be expected to have policies that support the development of small 'windfall' and undeveloped sites – particularly through Neighbourhood Plans and LDPs.</p> <p>At least 10% of the sites allocated for residential development should be sites of half a hectare or less.</p> <p>LPAs will also be expected to give much stronger support for 'rural exception sites' that provide affordable homes for local people.</p>	<p>contain a policy on this.</p> <p>We have positively engage with communities in respect of Neighbourhood plans.</p>	<p>The Summits recognised the contribution to housing delivery that is made by smaller developers/builders, and there has been a suggestion that larger sites might be divided-up to encourage more SME builders.</p>	<p>(G3) Will these policies support rural growth and sustainability in SK?</p>
2.5	<p>A new generation of new communities</p> <p>In addition to creating institutional and financial mechanisms in support of approved Garden Towns & Villages, government are interested in ideas around the use of LDOs or Development Corporations to bring forward additional garden cities/ villages.</p>	<p>The designation of Spitalgate Heath as a Garden Village is evidence of our engagement in Government-initiated efforts to deliver high quality places more quickly.</p>	<p>Views expressed through the Housing Summits were that the Garden Village should be an exemplar that should set the quality expectation for all of the new housing delivered in the district.</p>	
3	Strengthening neighbourhood planning and design			
3.1	<p>The White Paper sets out a range of detailed measures to further support neighbourhood planning,</p>		<p>The importance of high quality design (both inside and outside) is a common theme in many of the</p>	<p>(G4) Do Members support the strengthening of requirements for neighbourhood and local plans to set out</p>

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	and strengthen the ability of communities to influence the design of what gets built in their areas.		key areas discussed through the Housing Summits.	clear design expectations? (G5) Do Members agree that design should not be used as a reason to object to development where it accords with clear design expectations set out in statutory plans?
3.2	<p>Using land more efficiently for development</p> <p>The Government proposes to make it clear that plans and individual development proposals should make efficient use of land and avoid building at low densities – especially in high demand/ urban areas. This is subject to design, accessibility and infrastructure capacity issues.</p> <p>This will include a review of the nationally described Space Standard and how it is used in planning.</p>		There have been discussion in the Housing Summits regarding the importance of high quality design and of respecting the character of existing settlements. Some areas of the district will have a higher density than others.	<p>(G6) Might higher density development be appropriate/desirable in certain areas of the district?</p> <p>(G7) What are Members' views on the potential reduction of the current Space Standard?</p>
4	Providing greater certainty			
4.1	<p>Five-year land supply</p> <p>At present, an authority which cannot demonstrate a five-year supply of land against the housing target in its plan is vulnerable to the plan being undermined. This means the local authority can lose a significant degree of control over where new housing is built,</p>	We currently have a 5.3 year supply of housing (with a 5% buffer), and have always sought to ensure that the supply of housing is sufficient to meet local need. However, housing delivery has struggled due to factors that are clearly unrelated to the pure	The need for certainty in housing delivery has been recognised through the Housing Summits.	

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	<p>because in these circumstances the presumption in favour of sustainable development applies.</p> <p>The government propose giving LPSs the opportunity to have their housing land supply agreed on an annual basis and fixed for a 1-year period. LPAs who wish to do this will need to provide for a 10% buffer on their 5-year land supply.</p> <p>Guidance will set out more detail on how the 5-year land supply should be calculated. Drafts should be published for consideration by the Planning Inspectorate.</p>	supply of housing land.		
4.2	<p>Deterring unnecessary appeals</p> <p>The government proposes to introduce a capped fee for making a planning appeal. It is seeking views on the level(s) of such fees.</p>			
4.3	<p>Increasing planning fees</p> <p>LPAs will be able to increase fees by 20% from July 2017 if they commit to invest the additional fee income in their planning department.</p>	The Council has already accepted this initial fee increase and is developing plans for how this additional 20% can be invested to ensure delivery of housing at the right speed.	One of the points made through the Housing Summits is the cost of pre-application advice. If pre-application fees were reduced/removed, could it act as a boost to development?	(G8) Whilst this new approach may be welcomed, do Members share some commentators' view that councils should have the ability to set fees to recover costs so that council taxpayers no longer have to subsidise planning?
4.4	Addressing skills shortages			

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
	<p>Government intends to change the way it supports training in the construction sector, including:</p> <ul style="list-style-type: none"> • A review of the purpose of the Construction Training Board; • The launch of a new route into construction in September 2019 and • Work to challenge house builders and other construction companies to invest more in training. 	<p>Our involvement in the Local Enterprise-wide skills review and close working relationship with the colleges and universities in the area will ensure that we are well-placed to influence and support emerging policies and practices.</p>	<p>The Summits have recognised the importance of construction skills and working in partnership with local colleges to create a local skills base that ensure the economic benefit of housebuilding is maximised locally.</p>	<p>(C2) Do Members consider that this is a sufficient response by government? Will it help with construction-related skills shortages in South Kesteven?</p>
5	Ensuring infrastructure is provided in the right place at the right time			
5.1	<p>Support strategic infrastructure investment (with LPA's expected to identify development opportunities that such investment offers at the time funding is committed)</p>	<p>We are already doing this with the Grantham Southern Relief Road – with the potential realisation of additional sites expected to contribute to the cost of infrastructure delivery.</p>	<p>The importance of infrastructure (community, as well as transport) has been recognised.</p>	
6	Holding developers and local authorities to account			
6.1	<p>Greater transparency through the planning and build out phases</p> <p>The White Paper proposes various changes to data collection, collation and analysis such that better information on delivery, build-out rates and the development pipeline is available.</p>	<p>This is a known issue in respect of our housing delivery figures; the returns received from NHBC often capture housing completed 9 months previously.</p>		<p>(G9) Would Members support the creation of a universal housing database that all developers/builders/local authorities are required to contribute to?</p>

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
6.2	<p>Sharpening local authority tools to speed up the building of homes</p> <p>Through the White Paper, the government suggest that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development.</p> <p>Government is considering encouraging local authorities to shorten the timescales for developers to implement a permission for housing development from three years to two years, except that this impacts upon scheme viability.</p>		<p>Through the Summits, Members have raised the question of 'who is the consent being approved to' – differentiating between those that want a consent to increase the land value and those that want the consent in order to build-out a scheme.</p> <p>The length of consents has been raised through the Housing Summits; although there is an acceptance that to shorten the period of consent too much may negatively impact on the likelihood of development.</p>	
6.3	<p>Improving the completion notice process</p> <p>The Government wants to ensure that local planning authorities have more effective tools to deal with circumstances where planning permission has been commenced, but no substantive progress has been made to build homes.</p>		<p>Members were keen that Government targeted builders who land-banked; requiring them to deliver within a specified time frame, or land would lose its consent or revert to LA ownership.</p>	

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6.4	<p>The housing delivery test</p> <p>Government is proposing to introduce a new housing delivery test that will highlight whether the number of homes being built is below target, provide a mechanism for establishing the reasons why, and where necessary trigger policy responses that will ensure that further land comes forward.</p> <p>Where under-delivery is identified, the Government proposes a tiered approach to addressing the situation. Proposed penalties vary according to the percentage difference between delivery and the LPA's housing requirement and over time. The strongest penalty is an application of a presumption for development.</p>		<p>Housing delivery is a key aspect of the emerging Housing Strategy, and a more thorough understanding of the issues with achieving housing targets can only help.</p>	<p>(G10) However, do Members think that such a test is reasonable and fair? Should more focus be put on establishing reasons for projected under delivery well in advance or potential under-achievement?</p>
7	Affordable housing			
7.1	<p>Changing the definition of affordable housing</p> <p>Perhaps the most notable change in policy; the government are proposing to considerably widen the definition of affordable housing. In this context, the government also propose to:</p>	<p>Our delivery of Affordable Housing last year was well above target (160 units against a target of 100) however, uncertainty around Starter Homes has meant that affordable housing numbers</p>	<p>The importance of a range of affordable housing options has been recognised through the Housing Summits.</p>	<p>(C3) The White Paper is positive about private renting – a shift away from the previous government's focus on owner-occupation. But there is nothing in the proposals about social renting. A serious increase in social rented supply would</p>

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
	<ul style="list-style-type: none"> • Introduce a combined household income eligibility cap of £80,000 (£90,000 for London) on Starter Homes. Increase repayment periods from five to fifteen years; • Introduce a definition of affordable private rented housing, which is a particularly suitable form of affordable housing for Build to Rent Schemes; • Provide for a transition period to enable the development of new policies and a partial review of local plans. The new definitions would come into force on April 2018. 	for 16/17 are currently below the target of 60 units.		<p>need new funding beyond the modest increase in the Affordable Homes Programme. Options for financing this would include lifting bars on HRA borrowing and 100% recycling of proceeds from the Right to Buy. What are Members' views about these issues?</p> <p>(C4) Commentators agree that the income cap will mean that Starter Homes in higher value areas will remain largely out of reach. On the other hand, the increase in repayment periods is welcomed, with some suggesting that this should mean that Starter Homes are used to sustain an increase in home ownership rather than just providing short-term investment opportunities. What are Members' views?</p>
	<p>Increasing delivery of Affordable Home ownership products</p> <p>Abandon the proposed statutory requirement for Starter Homes. Instead they require LPAs to deliver Starter Homes as part of a mixed package of affordable housing of all tenures that can respond to local needs and local markets;</p>	<p>Starter Homes were initially proposed as 20% of the total number of houses to be delivered on a site over 10 houses. The uncertainty around the mechanism for delivering starter homes caused an understandable nervousness in the housing market and many affordable housing development stalled.</p>		<p>(C5) What are Members' views on the change in approach to starter home delivery?</p>

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
	For all individual sites of 10 units or more, require local authorities to secure a minimum of 10% of all new homes as affordable home ownership products. Government are consulting on whether there should be exceptions to this rule (eg Build to Rent schemes; proposals for special needs housing).	The proposed 10% affordable housing quota is considerably below the current 35% policy requirement in South Kesteven.		(C6) Whilst the affordable housing quota will be formally established in the emerging New Local Plan, what are Members' views on this proposed minimum requirement?
	<p>A fairer deal for renters and leaseholders</p> <p>Government takes the view that renters' upfront costs need to be clarified and costs controlled. Accordingly, they propose to consult about the proposal to ban lettings fees to tenants.</p> <p>Banning orders for the worst landlords will be introduced. Local authorities will be able to issue fines as well as prosecute.</p>		This is an idea that emerged during the first Housing Summit.	
8	Diversifying the market			

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
8.1	<p>SMEs and investors</p> <p>Government wants to diversify the housing construction market. In pursuit of this objective, they aim to launch a £3 billion Home Building (loan) Fund, targeting SMEs.</p>		<p>The role that small developers play in housing delivery has been recognised though the Housing Summits.</p>	<p>(C7) Do Members support measures to encourage a larger contribution by SMEs?</p>
8.2	<p>Housing associations</p> <p>The White Paper speaks very positively about the role of housing associations in delivering housing supply. In pursuit of an objective to enhance their contribution, the government proposes to:</p> <ul style="list-style-type: none"> • Set out a rent policy for the period beyond 2020 to help them to borrow against future income. In the meantime the 1% rent reduction will remain in place; • Deregulate housing associations, reinstating its position that housing associations are classified as private sector bodies. • Enhance pressure on housing associations to 'explore every avenue for building more homes'. • Enhance their own efficiency. 		<p>The issue of the 1% rent reduction has been raised through the Housing Summits as a potential blocker to the Council's aspirations to deliver new Housing</p>	<p>(C8) Whilst there is no specific question in the White Paper consultation on the 1% rent reduction; given that it has been raised during the Housing Summit, do Members want to object to the retention of the 1% rent reduction in the Council's formal response to Government?</p>

#	Government's policy proposal	What we are doing already	Emerging themes from the Housing Summits	Questions for Members
	<p>Local authorities</p> <p>The White Paper also speaks positively about local authorities' contribution to house building. Government have expressed an interest in the scope for bespoke housing deals with authorities in high demand areas.</p> <p>The government has confirmed that it wants to see the extension of the Right-to-Buy to tenants of affordable and social homes built by local authority-controlled companies (LACCs).</p>	<p>We have recently registered the Council's wholly-owned housing company. The initial focus for this company is to bring forward development on under-utilised Council-owned land.</p>	<p>The importance of the role that SKDC plays in all aspects of housing has been a recurring theme through the Housing Summits.</p> <p>The loss of the Council's housing stock through 'right to buy' has been raised as an issue by some Members.</p>	

5. OTHER OPTIONS CONSIDERED

- 5.1 We could choose not to respond to the Government's consultation on the White Paper; there are areas within it where there are clear synergies with our emerging Local Plan and developing Housing Strategy. However, there are also areas which have been identified through our Housing Summit, where there are clear disparities with what is being proposed in the White Paper – a response to the consultation will allow these disparities to be highlighted and the Council's own views on the issue to be put across.

6. RESOURCE IMPLICATIONS

- 6.1 It is difficult to assess the full resource implications of the White Paper, and until the proposals are enacted it would be unwise to do so. However, the commentary in the table above includes reference to what resource is currently committed to various areas within the White Paper, and where the resource requirement may increase or decrease.

7. ISSUES ARISING FROM IMPACT ANALYSIS

- 7.1 No formal impact analysis is required in respect of the proposal to consider a response to the White Paper.

8. CRIME AND DISORDER IMPLICATIONS

- 8.1 There is reference in the table above to the potential impact of some of the proposals in respect of crime and disorder.

9. COMMENTS OF FINANCIAL SERVICES

- 9.1 No formal analysis on the financial impact of the White Paper has been carried out, although comments on the potential resource implications of the proposed legislation are included in the above table.

10. COMMENTS OF LEGAL AND DEMOCRATIC SERVICES

- 10.1 As part of the [White Paper](#), the government is consulting on changes to planning policy and legislation in relation to planning for housing, sustainable development and the environment. Changes are being proposed as part of the Neighbourhood and Planning Bill which is currently being drafted. Amendment of the National Planning Policy Framework is proposed.