

Cabinet 24 March 2021	 TOWER HAMLETS
Report of: Ann Sutcliffe, Corporate Director, Place Sharon Godman, Divisional Director, Strategy, Policy and Performance	Classification: Unrestricted
Council Premises Leased to Voluntary and Community Organisations revised Statement of Policy and Procedures	

Lead Members	Councillor Candida Ronald, Cabinet Member for Resources and the Voluntary Sector Councillor Mufeedah Bustin, Cabinet Member for Planning and Social Inclusion
Originating Officer(s)	Vicky Clark, Divisional Director Growth and Economic Development David Freeman, VCS Strategy and Policy Manager, SPP
Wards affected	All wards
Key Decision?	Yes
Forward Plan Notice Published	4 February 2021
Reason for Key Decision	Significant impact on wards
Strategic Plan Priority / Outcome	All

Executive Summary

This report proposes clarification of and revisions to the policy statement agreed at Cabinet in March 2018, 'Council Buildings Leased to Voluntary and Community Sector (VCS) Organisations - Statement of Policy and Procedures'.

The revised Statement includes a defined list of council owned premises that are considered to be the 'Community Premises Portfolio and clarifies the council's approach to leasing premises and eligibility for Community Benefit Rent Reduction for faith-based activity and for early years settings.

The report also considers the financial arrangements for CBRR which provides a rent reduction for VCS tenants to reflect the value their use of council premises may bring to the wider community.

The report also clarifies the council's approach to leasing buildings for faith based activity and for early years settings.

This report sits alongside the report 'Action Plan in Response to the Scrutiny Challenge Session regarding the Premises Charges and Community Benefit Rent Reduction Scheme' elsewhere on this agenda.

Recommendations:

The Cabinet is recommended to:

1. Agree the revised Statement of Policy and Procedures relating to council premises leased to voluntary and community sector organisations set out at appendix A, and
2. Note the specific equalities considerations as set out in Paragraph 4.

1 REASONS FOR THE DECISIONS

- 1.1 The council agreed a Statement of Policy and Procedures relating to council premises leased to voluntary and community sector organisations in March 2018. As good practice this statement has been reviewed and a revised statement has been produced which clarifies and updates the previous statement. The revised statement also addresses issues raised in the Scrutiny Challenge Session report on community premises.

2 ALTERNATIVE OPTIONS

- 2.1 The council could continue to operate with the existing statement.

3 DETAILS OF THE REPORT

Background

- 3.1 This report sets out an updated statement of policy and procedures relating to premises leased to voluntary and community sector (VCS) organisations, in particular the Community Benefit Rent Reduction scheme.
- 3.2 Historically, the council has had a range of arrangements with VCS organisations that occupy its premises and the rent payable has ranged from a peppercorn to a commercial market rent. In December 2015 Cabinet agreed a policy that set out the principles in relation to how the council will allocate and charge for the portfolio of council-owned community premises to help the council satisfy its legal requirements in relation to securing best consideration when disposing of property, as well as demonstrating continued compliance with the best value duty. In November 2016, after a review of its community premises and consultation with the voluntary sector, the Mayor in Cabinet agreed arrangements to ensure all VCS organisations which occupy its premises have a lease or hiring agreement and are charged an appropriate rent (with some specific exceptions). It was also noted that formal lease

arrangements would clearly define responsibility for meeting the cost of outgoings such as business rates, utilities and routine maintenance.

- 3.3 Alongside ensuring VCS organisations lease premises at an appropriate rent, Cabinet agreed a scheme to reduce the rent payable for organisations with three to five year leases which also meet specific criteria relating to the community benefit of their activities and their organisational governance and management, the Community Benefit Rent Reduction scheme (CBRR). The report acknowledged that, while the move towards formal lease arrangements with a market level rent payable would increase the council's overall rental income, the CBRR scheme would be, in effect, income foregone, reducing the net increase in potential rental income.
- 3.4 This policy was initially agreed for organisations occupying premises in what was described as the community portfolio. In March 2018 the Mayor in Cabinet agreed recommendations to extend the policy to a wider range of VCS organisations occupying Council premises. The report to Cabinet also included a statement of policy and procedures relating to council premises leased to VCS organisations.
- 3.5 In the light of experience implementing these arrangements, a revised policy statement has been drafted which clarifies some issues included in the previous policy statement and also responds to the issues raised by the Overview and Scrutiny Committee in its Scrutiny Challenge set out elsewhere on this agenda. This policy will apply to all premises included in the community portfolio as defined below and listed in appendix A (App 8). This includes standard lease terms and, if eligible, the community benefit rent reduction scheme. Premises in the community portfolio are currently considered to be community facilities. It is therefore likely that, if the council decided to lease any of these premises for commercial or retail use, permission for change of use would be required.

Scope of the Community Portfolio

- 3.6 Previous reports to Cabinet have referred to the premises occupied by VCS organisations as the 'Community Portfolio'. This list was based on the work done in 2015/16 to review the council's arrangements to lease premises to VCS organisations. This list of premises has been revised to take account of changes that have taken place since 2015 and is attached as an appendix to the Statement of Policy and Procedures appended to this report.
- 3.7 While the council does not specifically categorise its premises into defined portfolios, those which are within the community portfolio would not be premises where the council would expect to generate a commercial income such as shops, railway arches, office facilities, and parking/garaging facilities, premises required by the council for offices or direct service delivery, or multi use buildings where there may be a mixture of users hiring space on a long term or occasional basis.

- 3.8 By defining which premises are included in the community portfolio, the council will be clearly identifying those where, if the tenant is eligible, community benefit rent reduction (CBRR) may apply. However, there are VCS organisations who occupy other premises which are not in the community premises portfolio. The CBRR scheme was extended in March 2018 to include VCS occupiers of premises that were not on the then current list of community premises. These were organisations occupying other council premises either at a peppercorn or nominal rent who would be required to pay significantly higher rent when their occupation agreement was formalised to a lease. For these small number of cases, CBRR will only be available for existing occupiers as agreed in March 2018. If any of the buildings becomes vacant, it will be marketed in accordance with the council's asset disposal procedures and any new tenants, whether VCS organisations or not, will be required to pay a market rent. These premises and the existing occupiers are included in the appendix listing community premises.
- 3.9 In exceptional circumstances the council may agree to premises being added to the community premises portfolio. To be considered the premises must,
- Be currently occupied by a VCS organisation;
 - Be different in nature from premises where the council would expect to generate a commercial income such as shops, railway arches, office facilities, and parking/garaging facilities, and not be required by the council for offices or direct service delivery, and
 - Not be used for the delivery of statutory services through a public service contract.
- 3.10 The council will also take into consideration the potential cost to the council tax payer through rental income foregone.

Vacant Premises

- 3.11 Where premises in the community portfolio are vacant, the council will offer the opportunity to lease the building as set out in Para 3.6 of the council's Property Procedures for Disposals and Lettings (2019)

Lease Terms

- 3.12 The revised statement includes some minor changes to the previously agreed standard lease terms and conditions to clarify the terms of the lease agreement.

Stepped Rent

- 3.13 The revised statement does not propose any change to the stepped rent arrangements that may be offered to VCS occupiers that are not eligible for CBRR.

Community Benefit Rent Reduction

- 3.14 The revised statement retains the core principles and eligibility criteria for the Community Benefit Rent Reduction (CBRR) scheme. To bring the scheme into line with other support to the VCS, the organisational eligibility assessment will be the same as for the Local Community Fund and other funds. For larger levels of rent reduction (£20k+ per annum) the council will continue to require an additional social value assessment.

The CBRR Assessment Panel membership has been updated to reflect changes in lead responsibility from Resources to Strategy, Policy and Performance.

- 3.15 Monitoring and compliance arrangements remain unchanged but may be linked to the monitoring arrangements for Discretionary Rate Relief in the future.
- 3.16 The CBRR scheme includes some exclusions based on type of activity and financial responsibility for resourcing certain activities.
- 3.17 The position of early years providers was also considered as part of the Scrutiny Challenge Session report referred to previously. The report recommends the council amends the CBRR scheme to recognise the value nurseries/playgroups, faith groups and Tenants and Residents Associations bring to the community (Recommendation 1).
- 3.18 Many early years organisations occupying council premises are sessional rather than full time child care providers, often for only four or six hours on term time weekdays. These organisations may be eligible for the lower rates of CBRR agreed in 2018 for situations where there is a mixture of CBRR eligible activity and non-eligible activity.
- 3.19 Appendix 6 of the attached revised statement of policy and suggests ways that part time providers may extend the use of the premises they occupy to make them potentially eligible for a lower rate CBRR. This may be through additional activities they provide themselves at their premises or through making the premises available to other providers at time when they are not using them.
- 3.20 The council's position regarding support for child care remains that, while the principal source of public subsidy remains central government, it would be unfair to other providers if some received additional subsidy simply by virtue of occupying council owned premises. This does not preclude the council from providing additional subsidy where, for instance, there is a shortage of appropriate child care, but the mechanism for this should not be through rent reduction.

- 3.21 The Scrutiny Challenge Session report recommendation 1 also refers to faith groups. Historically, many social welfare activities have been provided by faith based organisations to people who are not adherents to that faith. The value of these activities is widely recognised, and many have been funded by the council through its grants programmes and through public service contracts.
- 3.22 There is an inevitable tension between supporting the social welfare activities provided by faith based organisations and the perception that, by doing this, the council may be indirectly supporting the promotion of one particular faith rather than another, which would be a clear breach of its public sector equality duties.
- 3.23 The CBRR scheme stated that, 'Faith-based organisations, not occupying a place of worship and providing general community use, will be eligible to apply for the community benefit rent reduction'. The Scrutiny Challenge Session report (para 4) highlights that eligibility is unclear where there is multiple use of premises, some of which clearly relates to worship and the promotion of a particular faith and other activity that is inclusive and open to the wider community.
- 3.24 In response to this concern the revised CBRR scheme set out in the revised statement of policy and procedures now states that worship and other faith based activity is excluded but this will not prevent an allowance being made for parts of the building that are made available for use by other members of the community or for general community use. Appendix 7 of the statement sets out in more detail how the CBRR may be applied to different patterns of use of premises where there is mixed use. It also defines where activity may be considered inclusive and not confined to congregants of a faith based organisation. This is particularly important where the local population that may use the services is predominantly from one faith group.

Financial Implications

- 3.25 When the CBRR scheme was agreed in November 2016 the estimated rental value arising from new leases to VCS organisations potentially eligible for CBRR would be £400k with a net income of £80k based on the premises included at that time in the community portfolio. Eligibility for CBRR was subsequently extended to organisations occupying premises not in the community portfolio. The estimated additional rental value of these new leases was £120k. Assuming all eligible organisations successfully applied for CBRR at the full 80% reduction, it was therefore anticipated the additional net rental income would be c.£104k
- 3.26 Due to changes in occupancy and rental values since the earlier estimates were calculated in 2015/16 the total potential income from premises occupied by VCS organisations that may be eligible for CBRR is £784k. The table below shows the rental income from premises vested in the council's general fund and those vested in the Housing Revenue Account. Rental income from HRA buildings must be paid to the HRA account and not used to offset the

cost of CBRR unless it can be demonstrated that the beneficiaries of services provided at these premises are LBTH tenants and leaseholders. The activities of some of the organisations occupying HRA premises are exclusively or principally for the benefit of the residents of the estates where they are located. It is therefore reasonable for the cost of CBRR to be met from the HRA for these activities and the HRA compensated only for uses that are not principally for local tenants and leaseholders.

	Number of lessees potentially CBRR eligible	Potential rental income from CBRR eligible organisations	Income foregone through CBRR	Net overall cost of CBRR to G/F	Net overall cost of CBRR to HRA
General Fund	6	£174,694	£101,355	£101,355	£0
HRA - general activity	17	£516,024	£373,718	£373,718	£0
HRA - HRA activity	4	£82,328	£65,862	£0	£65,862
Total	27	£773,046	£540,935	£475,073	£65,862

- 3.27 The budget required to meet the potential cost of CBRR is £541k. However, this is partly offset by general fund income to the council and the activities in HRA premises where the beneficiaries are local tenants and leaseholders. The amount required to compensate the HRA is £374k. The additional budget to meet the cost of CBRR is only required as and when new leases are completed.
- 3.28 The adjustments may be made to in year and future year budgets for property income to take account of the changes in income and expenditure arising from CBRR as new leases are completed.
- 3.29 It should be noted that agreeing lease terms with VCS occupiers will bring savings in other areas of expenditure. The report to Cabinet in November 2016 noted that £500k was spent annually by the council in responsive repairs to buildings occupied by VCS organisations. In a small number of cases the council pays business rates which would be payable by the tenant under a lease. There will also be cases where a lease will also clarify responsibility for service charges and utilities which have been paid by the council.

4 EQUALITIES IMPLICATIONS

- 4.1 A full equality impact assessment was carried out when the council reviewed its premises arrangements with VCS organisations in 2016 and the mitigating actions relating to early years services and faith based organisations were implemented and reported as part of the report to Cabinet in March 2018 where the initial Statement of Policy and Procedures was agreed.

- 4.2 The equality impact analysis of the revised Statement of Policy and Practice concluded that there will be minimal impact for people with protected equality characteristics. While it is noted that people who share protected characteristics benefit from the services provided by organisations that are council lessees, the proposals clarify rather than change the current arrangements and eligibility for CBRR.
- 4.3 The Grants Determination (Cabinet) Sub-Committee will continue to have the opportunity to monitor the impact of the CBRR scheme on people with protected equality characteristics through the regular reporting arrangements of decisions on CBRR made under delegated authority.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.

Best value implications

- 5.2 Recent legislation, particularly the Localism Act 2010, has emphasised the role of communities working in partnership with local authorities to help achieve more effective and less costly services to local people. The CBRR scheme is one of the ways the council is developing this partnership working.
- 5.3 The establishment of clear, transparent and robust policy and practice in relation to leasing council premises to VCS organisations is closely aligned with the council's Best Value Action Plan, which was drawn up following the issuing of Direction from the Secretary of State for Communities & Local Government in December 2014.

Consultation

- 5.4 The initial Statement of Policy and Practice was the subject of consultation with the VCS reported to Cabinet in March 2018. Since that time there have been ongoing discussions through the VCS Premises Forum convened by Tower Hamlets Council for Voluntary Service.

Risk Management

- 5.5 Having a clear, consistent and transparent policy on charging and allocation of community spaces and buildings will minimise the risk of challenge on

decisions the Council takes in relation to allocating and charging for buildings leased to VCS organisations.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

- 6.1 The current estimate of the total potential net rent reductions is £540,935 per annum, of which the General Fund component is estimated as £475,073 and the Housing Revenue Account (HRA) will fund the rent reductions relating to organisations that provide a benefit to HRA related residential areas (estimated at £65,862 per annum).
- 6.2 A target adjustment (budget transfer) will be processed to transfer the needed General Fund budget from Corporate to Place directorate to reduce the rental income budgets in Place for the rent reductions.

7 COMMENTS OF LEGAL SERVICES

- 7.1 Under S.123 of the Local Government Act 1972 the Council has a duty to get the best price available at that time when disposing of an asset. However, this does not apply where the disposal tenancy is 7 years or less. Therefore, in respect of tenancies of 3-5 years duration, the Council is entitled to offer the tenancies at a rent it considers appropriate in the circumstances. Therefore, the report in this regard is lawful.
- 7.2 The Council is therefore entitled to review its entire property portfolio and allocate various properties as being part of a community portfolio as it sees fit provided no subsequent lease is longer than 7 years.
- 7.3 Offering properties at a less than market rent or to allow the application of the rent reduction scheme following an assessed application has the effect of a non-cash grant to the beneficiary organisation. Therefore, there is consistency in applying similar criteria to the ability to obtain reduced rents as the Council applies to cash grants. This demonstrates legal rationality across the schemes.
- 7.4 The Council will continually monitor the use of the buildings within the Community Portfolio to ensure that persons of a type of protected characteristic are not discriminated against when compared with persons who do not have that characteristic in line with the Equality Act 2010.
- 7.5 Where the particular building belongs to the HRA account and therefore rent realised from the letting belongs to the HRA the Council is required to account for the full amount of the rent in the HRA, notwithstanding the fact that an organisation in an HRA building has been offered rent reduction. This means that the Council would have to make up the difference between the amount of rent actually paid into the HRA and the undiscounted amount of rent that should have been paid from its own general fund, either by way of rebate to the organisation or by directly transferring general fund monies into the HRA.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Appendix A - Statement of Policy and Procedures - Council Buildings Leased to Voluntary and Community Sector (VCS) Organisations March 2021

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- None.

Officer contact details for documents: N/A

Tower Hamlets Council

**Council Premises Leased to Voluntary and Community
Sector (VCS) Organisations**

Statement of Policy and Procedures

March 2021

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Introduction

The council's VCS Strategy includes a commitment to supporting the sector through taking a strategic approach to providing premises. This strategic approach also commits the council to making best use of resources through a fair and equitable approach towards organisations using all or part of a council owned building.

The business rationale to support a fair policy for the leasing of premises in its ownership enables the council to:

1. Meet the current legal requirement to secure both best value and best consideration;
2. Make the basis of any subsidies clear and transparent;
3. Ensure that community premises in the council's ownership are fit for purpose, particularly as regards health and safety and preventative maintenance;
4. Recover the costs of maintenance and repair of premises, or make clear where responsibility for these lies with the tenant;
5. Demonstrate a fair, consistent and justifiable approach to letting premises to voluntary and community sector organisations;
6. Maximise the utilisation of community premises conducive to optimum local benefit, encouraging shared use of premises where possible;
7. Formalise tenancy agreements based on standardised contractual models, and
8. Reduce the amount of council management time spent on running community assets.

The council initiated a full review of its portfolio of community premises in December 2015 which reported in November 2016. The full Cabinet reports can be found at,

<http://democracy.towerhamlets.gov.uk/documents/s93867/5.6%20-%20Community%20Buildings%20Cabinet%20Report.pdf>, and

<http://democracy.towerhamlets.gov.uk/documents/s79780/5.2a%20Ccommunity%20Buildings%20Management.pdf>.

In July 2017 the council agreed to initiate further work to bring all premises owned by the Council within the scope of the arrangements agreed previously for community premises. Following further consultation with VCS organisations, revised arrangements were agreed together with a Statement of Policy and Procedures.

This report can be found at,

<http://democracy.towerhamlets.gov.uk/documents/s123865/5.4%20Premises%20leased%20to%20VCS%20Organisations.pdf>.

Scope of the Community Portfolio

The council has a property portfolio which is let at commercial rates to provide valuable additional income towards meeting the cost of delivering services to local residents. There are also council owned premises that are used primarily for delivering services to local residents either directly by the council or by other organisations through service agreements or public service contracts. In addition, the council has identified premises whose primary function is supporting locally based voluntary and community sector organisations to provide facilities and services for the community, rather than to generate a commercial income. These premises, described as being in the council's Community Premises Portfolio, may be leased to recognised voluntary and community sector tenants at the council's standardised 'community rent', currently £14 per annum per square foot, and the tenant may be eligible to be considered for the council's community benefit rent reduction scheme (CBRR) set out separately in this document. The council recognises that VCS organisations may also be tenants of premises that are not in the community premises portfolio. The 'community rent' will not apply to these premises and the occupiers will not be eligible to seek CBRR.

The current Community Premises Portfolio is listed at Appendix 8.

In exceptional circumstances the council may agree to premises being added to the community premises portfolio. The to be considered the premises must,

1. Be currently occupied by a VCS organisation;
2. Be different in nature from premises where the council would expect to generate a commercial income such as shops, railway arches, office facilities, and parking/garaging facilities, and not be required by the council for offices or direct service delivery, and
3. Not be used for the delivery of statutory services through a public service contract.

The council will also take into consideration the potential cost to the council tax payer through rental income foregone.

New premises that come into the council's ownership designated for community use, such as premises passed to the council through s106 agreements, that do not already have a specified use may be considered for inclusion in the community premises portfolio.

Vacant Premises

Where premises in the community portfolio are vacant, the council will offer the opportunity to lease the building asset out in Para 3.6 of the council's Property Procedures for Disposals and Lettings (2019)

Lease Terms

Occupiers of council owned premises must have a formal agreement with the council that governs the terms of their occupancy. The council will normally offer a short term lease of three to five years on the basis of the standard principal lease terms set out in appendix 1. Where an organisation does not require or may not be able to have exclusive use of a building full time, the Council may issue a licence to occupy which has limited security but may be sufficient for the organisation's needs and allow other occupation to make better use of the resource.

The council may allow occupation under a tenancy at will in circumstances where a lease is not appropriate such as a short term occupancy, or in anticipation of a lease being negotiated. The period of a tenancy at will not exceed six months.

An organisation occupying a council building that does not have a lease or other appropriate occupation agreement will not normally be eligible to receive council funding.

Stepped Rent

Many VCS organisations have occupied council premises on terms where the rent has been a peppercorn or a nominal amount. The transition from paying a limited contribution for their building to paying a market rent may present financial challenges for some organisations. The Council may therefore offer a graduated or 'stepped' increase in rent over the period of the new lease. Details of how this operates are set out in Appendix 2. The offer of stepped rent is considered in consultation with the relevant council service. Where necessary business planning advice and mentoring is offered to minimise the impact of the introduction of charges. This is normally by referral to Tower Hamlets Council for Voluntary Service (THCVS), funded by the Council as part of the THCVS infrastructure support contract.

Community Benefit Rent Reduction

The Council recognises that the activities of many organisations which occupy its premises provide valuable community benefits. In recognition of this, the Council will offer a rent reduction of up to 80% of the rent payable to organisations which meet specific eligibility criteria and can demonstrate their activities provide community benefit.

The rent reduction scheme was set up in consultation with the VCS to provide a transparent and consistent method of assessing the community benefit. It is open to all organisations which hold short term (3-5 year) leases with the Council subject to specified exceptions set out below.

The Council recognises that organisations may derive part of their funding from economic activity but all or part of its other activities could be considered to have community benefit. Where an organisation may be able to meet the community benefit criteria in part, the Council may offer 40% or 20% rent reduction depending on the proportion of activity which meets community benefit criteria. Appendix 3 sets out how this partial rent reduction is assessed.

For example, if an organisation occupies premises where the annual rent is £10,000, based on an area of 714 sq ft at £14.00 per sq ft, CBRR would apply as set out below,

	80% CBRR	40% CBRR	20% CBRR
Full rent value	10,000	10,000	10,000
CBRR	8,000	4,000	2,000
Net rental due	2,000	6,000	8,000

Rent is normally invoiced quarterly. The invoice would show the full amount of the rent, the CBRR discount applied and the net amount due. Organisations are expected to acknowledge this discount in their annual accounts and should instruct their accountants accordingly.

Eligibility criteria

To be eligible for CBRR, an organisation must,

1. Occupy a building in the council's 'Community Portfolio' with a lease of three to five years or occupy a building outside the community portfolio which the council has agreed may be within the CBRR scheme;
2. Be community led
3. Demonstrate good governance;
4. Be capable of managing a building;
5. Be willing to share space;

6. Show how their activities contribute to the Tower Hamlets Plan outcomes, and
 7. Embrace diversity, work to improve community cohesion and reduce inequality;
- The criteria are asset out in full in appendix 4

Application Process

When a new lease is being negotiated with a VCS organisation for a building in the community portfolio the council will invite the organisation to apply for CBRR. This will happen early in the process to allow the organisation to apply for CBRR and for it to be assessed and determined before the lease is agreed.

The organisation will complete an application form that will test its eligibility against the published criteria using the council's standard Organisation Assessment Form. Where the building to be leased will be hired out to other organisations, community groups or local residents the organisation must either have or be working towards achieving a quality mark relevant to managing premises that will be used by others. Where premises are used in other ways such as administrative offices or activity space solely to deliver the applicant organisation's services, other nationally recognised quality assurance standards may be acceptable.

Where the potential benefit to the organisation exceeds £20,000 per annum, it will also be required to complete a social value assessment.

Where an organisation fails to meet the quality assurance criteria but has an assessment which indicates it could meet the required standard within a maximum of twelve months and meets all other requirements, the Council may agree the rent reduction on condition that the organisation meets the required standard within a specified timescale. If the organisation fails to meet the standard within the specified timescale the rent reduction will be withdrawn. The standard break clause in the lease would give the organisation the opportunity to then surrender the building back to the Council without incurring a premium though it would remain liable for any outstanding debts and other liabilities to the Council.

The decisions on CBRR will be made by a panel comprised of,

- Head of Revenue Services (Chair)
- Head of Corporate Strategy & Policy
- Head of Asset Management
- Chief Executive, TH Council for Voluntary Service

The Terms of Reference for the CBRR Panel are asset out in Appendix 5

Rent Reduction Agreement

Organisations granted a rent reduction will enter into a grant agreement which will sit alongside but be separate from the lease. This agreement will set out the amount of

rent reduction and the terms on which it is given. It will also set out the monitoring requirements.

Where an organisation is given a rent reduction conditional on achieving a satisfactory quality standard, the grant agreement will be for the term agreed for the organisation to achieve that standard, not the full lease period. It will be extended for the full lease period if the organisation achieves the required standard in the specified timescale.

Monitoring and review

On-going eligibility for the community benefit rent reduction will be reviewed annually for the duration of the lease. The review may include site visits as well as analysis of Annual Reports and Accounts. The funding agreement will set out the monitoring requirements that will include details of activities undertaken throughout the year to demonstrate continued community benefit, use of the building, governance and management requirements and quality assurance.

If an organisation cannot provide evidence that it continues to provide the community benefit for which the rent reduction had been awarded, CBRR may be withdrawn by the CBRR Panel and the organisation will be required to pay the full rent. If the organisation subsequently considers that it is providing a community benefit, it will need to reapply for the rent reduction.

Exclusions

There are some exclusions for eligibility for CBRR.

1. Day care for under fives

Day care for pre-school children is provided in a range of settings and may be funded through direct contribution from parents and/or government support schemes for parents. It is recognised that the council is required to ensure there are sufficient such facilities available. However, by reducing the cost to parents through rent subsidy for its own premises and not others, the council is open to challenge that the basis of this support is not based on any assessment of need. However, the council will consider applications for CBRR from organisations providing day care for under fives where other activities also take place in the premises as set out in Appendix 6.

2. Promotion of faith

Premises used solely for religious services or other services limited only to the congregation will pay full rental value based on the permitted use. However, where a building is not used solely for faith related activity, this will not prevent an allowance being made for parts of the building that are made available for use by other members of the community or general community use. Eligibility for CBRR in these circumstances is set out in Appendix 7.

3. Other funding

Organisations whose rent is met in full through their current council funding or funding provided by another public body will not be eligible for CBRR.

4. Economic activity

Premises that are used to generate income for but are ancillary to an organisation's charitable or community benefit objectives such as a charity shop or bar.

5. Other leasing arrangements including,

- A lease of less than three years and longer than five years;
- Ground rent only, and,
- Any other agreement with the Council which is not a standard lease as set out in this policy.

Appendices

Appendix 1	Principal Lease Terms
Appendix 2	Step Rent Arrangements
Appendix 3	Partial Rent Reduction
Appendix 4	CBRR Eligibility Criteria
Appendix 5	CBRR Assessment Process and Procedure
Appendix 6	Premises used for Day Care for Under Fives
Appendix 7	Faith Based Organisations
Appendix 8	Community premises portfolio

Principal Lease Terms

1. Length of lease

Where applicable, the building would be let on a standard form of lease for a period to be agreed. In most cases this would be for 3 to 5 years. By defining a term this may give occupiers sufficient security to plan services and invest in the property, in such things as furnishings or internal decoration.

For some, particularly medium or larger organisations, there is the opportunity to seek grant funding from organisations outside the Council e.g. Big Lottery Fund etc. In these circumstances, funders may insist that leases are in place for longer periods, commonly 25 years; these could be accommodated in appropriate cases. In all leases with a term in excess of 5 years there would be a landlord's break option, on notice, if the property was required for redevelopment or as otherwise appropriate. The law provides remedies if the tenant breaches the terms but these could be specified in the lease.

Where organisations are in receipt of funding (either through grants or service contracts) solely from the Council, leases will not run beyond the period for which the grant funding or the service contract is expected to terminate.

2. Break clauses

In certain circumstances, for example where there is a possibility of the property being required for redevelopment or other purposes, or there is a link to provisions in a service contract, there may be a clause inserted giving the landlord the option of breaking the lease before the end date.

There will also be a tenant's break clause as standard. This will allow tenants to respond to changes in the organisation's financial circumstances and allow an organisation to return the building to the Council without premium if it loses Council funding. This will generally take the form of a rolling break after one year, on six months' notice.

3. Rent

Rent will be based on open market value based on permitted use. Rent for general community use will be referred to as 'community rent'. This is currently set at £14psf and will be reviewed periodically in line with market conditions.

In very limited circumstances, the Council may enter into a lease based on a peppercorn or nominal rent. However, these will be limited to Tenants and Residents Associations (TRAs) as recognised by Tower Hamlets Homes Limited

(the Council's arms-length housing management company) for the purposes of discharging their statutory functions.

4. Landlord and Tenant Act 1954

All leases will be excluded from the security of tenure provisions of the Landlord and Tenant Act 1954, meaning that there is no right to renew leases. This has the effect of reducing slightly the open market rental value for the property. For some larger organisations paying full market rental and on standard commercial terms, this exclusion may be waived by negotiation.

5. Outgoings

The tenant will be responsible for all outgoings including charges for services (gas, electricity, water, rates etc.) and will be responsible for the costs of statutory testing where carried out by the Council, internal redecoration and security.

6. Repairs

The Council will carry out external repairs and recover the cost. In order to keep the cost of the recharge down, once any initial repairs have been undertaken, the Council will only be responsible for maintaining the building to the extent that it is wind and watertight plus periodic redecoration to preserve the fabric of the building. Repairs beyond this will be at the Council's discretion following consultation with the tenant.

7. Internal repairs

The tenant will be responsible for decorations and cleaning. Responsibilities for other internal repairs and maintenance will be agreed for each tenant, based on competence and experience. In the event that the Council takes these responsibilities it will recover costs through a recharge. The Council will carry out statutory testing and recover costs through a recharge.

8. Insurance

The Council will insure the building only and recover the cost from the tenant. The tenant will be responsible for contents and all other insurance, including plate glass if fitted.

9. Sharing use of the property

Tenants will be encouraged to allow other bona fide groups to use the accommodation. This could form part of the assessment of community benefit. The lease will regulate this type of sub-user by requiring them to enter into a

prescribed form of licence with the tenant, setting out the obligations of the licensee. Council officers will assist with a suitable standard form of licence.

The Council may also take steps to ensure that support is in place to help groups to publicise the availability of space within a building. This may include assistance with website design and links from the Council website, or advice and one off grant support to help with advertisements, posters and other publicity via the Communities Team.

Assignment and sub-lettings of the whole or parts is prohibited.

10. Governance

The tenant organisation will be properly constituted with named persons responsible for overseeing the tenant's obligations. The lease will be granted to a recognised legal entity or to trustees of unincorporated organisations. Guarantors may be required in some cases.

Stepped Rent Lease Agreements

A stepped rent arrangement is a mechanism to give a transitional period for a rent increase to take effect. In essence, the level of rent rises over the period of the lease at times and at levels agreed at the beginning of the lease. The steps reflect the low start in comparison to the full market rent and increase to the market rent in the final year of the lease.

In a commercial setting the principle is that the equivalent to full rent payments are made over the course of the lease term but stepped to make it less of a financial burden in the early years when a business may be starting up. Where the lessee is a VCS organisation the value of the community benefit it provides will be acknowledged by the Council through an element of subsidy incorporated into the stepped rent arrangement.

The council's stepped rent scheme gives an annual increase over the period of the lease. The starting point is the current rent plus 30% of the increase in year one with incremental 20% rises and 100% in the final year, as illustrated below. The effect of providing this transition would be to give a rent subsidy over the period of the lease of up to 32%. The burden of funding the subsidy will be met by whichever budget the rent is credited to, whether HRA or GF.

Where the rent has previously been a peppercorn or there has been no formal lease, the increase will be the new rent. For the purposes of the illustration below it is assumed a lease is already in place with a rent of £1,000 per annum. The new rent at renewal is £8,000, an increase of £7,000

Year	Rent payable	% of rent increase	Initial rent	Incremental increase	Saving on market rent
Year 1	£3,100	30%	£1,000	£2,100	£4,900
Year 2	£4,500	50%	£1,000	£3,500	£3,500
Year 3	£5,900	70%	£1,000	£4,900	£2,100
Year 4	£7,300	90%	£1,000	£6,300	£700
Year 5	£8,000	100%	£1,000	£7,000	0
Total					£11,200

This example is for illustrative purposes to demonstrate the principle and could vary according to the circumstances and lengths of individual leases.

Criteria

Stepped Rent will only be considered where a VCS organisation is excluded from the Council's rent reduction scheme. It will not be considered where an organisation is

eligible for the rent reduction scheme but fails to meet the organisational and community benefit criteria.

Each case will be considered on its merits, but the organisation must meet the same organisational and governance requirements as required for the rent reduction scheme and the premises not used for commercial purposes.

Application Process

The application process follows the same format as the rent reduction scheme with the opportunity to apply for stepped rent being offered with the offer of lease terms. The decision will be made by the CBRR Assessment Panel

Reporting

Where the Council agrees a stepped rent, the decision will be reported alongside the reporting of rent reductions to the Grants Determination Cabinet Sub-Committee for information.

Proportionate Rent Reduction

Activities that may be considered to be economic such as charity shops, bars and other trading activities are excluded from CBRR. This is consistent with other council support such as rate relief. There are other activities such as the provision of child care and faith based activity that may also be excluded from the scheme. However, these activities may take place in premises where the tenant organisation is also providing activities that have wider community benefit. The council will therefore consider in certain circumstances granting CBRR at a lower rate to take account of the community benefit activity.

Reduces rates

The standard rent reduction where a building is exclusively used for community benefit activity is 80%. The rent reductions for mixed use are;

1. 40% rent reduction where the use for community benefit activity is 50% – 99%, and
2. 20% rent reduction where the use for community benefit activity is 25% – 49%.

If the market rent for a building is £10,000, the lessee pays:

£2,000 if the building is used solely for community benefit activity;
£6,000 if the building is used over 50% for community benefit activity and
£8,000 if the building is used over 25% for community benefit activity.

Apportionment

The assessment of community benefit is based on the proportion of community use, calculated either in time or in space used for the different activities.

Time apportionment applies where a building is used for activities that are ineligible for CBRR, but which may also be used for community benefit activity, for instance in the evenings and at weekends.

Space apportionment applies where there is a mix of use at the same time and a significant proportion of space is used for community benefit activity.

The organisation is required to demonstrate in its application for CBRR the proportion of either,

1. Activity space which is devoted to community benefit activities (activity space excludes common areas and staff kitchen facilities but will include kitchens which are ancillary to activity rooms), or
2. Available opening time solely devoted to community benefit activities (time where both community and ineligible activities take place is not eligible).

Appendix 3

To qualify for a proportionate rent reduction, organisations must be able to meet the criteria set out in the rent reduction scheme for their community benefit activity.

1. The lessee can meet organisational standards criteria set out in rent reduction scheme
2. Activities meet the community benefit requirements set out in the rent reduction scheme

Annual monitoring of community benefit will include confirmation that the proportion remains as initially agreed or more.

CBRR Eligibility Criteria

The applicant organisation must be able to demonstrate that it is:

1. Community-led (i.e. its proposed/existing governance arrangements must demonstrate that it has strong links with the local community, and that members of the community are able to influence its operation and decision-making processes);
2. Appropriately constituted and capable of demonstrating good governance through open and accountable processes, with adequate monitoring, evaluation and financial management systems;
3. Capable of sustainably, legally, and safely managing an asset and delivering services from it;
4. Capable of demonstrating the social, economic, and environmental benefits they deliver through their activities and that these clearly link to the Council's own desired outcome for the borough as expressed in the Tower Hamlets Plan;
5. Able to demonstrate how they will embrace diversity, work to improve community cohesion and reduce inequalities;
6. Willing to offer space and support to other smaller local groups;
7. Able to demonstrate how the organisation contributes to the Voluntary and Community Sector Strategy Action Plan, and,
8. Willing to agree to the principles of the Tower Hamlets Compact.

CBRR Assessment Panel Terms of Reference

Role

Tower Hamlets Council recognises that the local community sector is a valuable and important asset that delivers important services and benefits to local residents. Tower Hamlets Council is committed to ensuring this community value is appropriately recognised and reflected in its community premises lettings policy.

The purpose of the CBRR Assessment Panel is to,

- Ensure the fair and transparent application of the Council's Community Benefit Rent Reduction (CBRR) policy;
- Assess individual applications;
- Make decisions on whether an applicant has met the requirements of the eligibility criteria, and,
- Monitor the CBRR programme.

Membership

The decisions on CBRR will be made by a panel comprised of,

- Head of Revenue Services (Chair)
- Head of Corporate Strategy & Policy
- Head of Asset Management
- Chief Executive, TH Council for Voluntary Service

Responsibilities:

- To consider and make decisions regarding applications for CBRR;
- To request and consider any supplementary information considered necessary to make decisions;
- To advise the Grants Determination Sub-Committee of decisions made and the reasons for those decisions;
- To consider the findings of the annual review process and monitoring reports, and
- To provide the GDCSC with all relevant information required to determine any appeal made by an organisation unsuccessful in its CBRR application.

Frequency of Meetings:

The Assessment Panel will meet as and when applications are received and at least twice a year to consider the findings of the annual review and monitoring.

CBRR provision for Early Years Settings

Proportionate CBRR (See App C) may apply where the activities of a child care provider are clearly different from full time child care providers and can be shown to have a wide community benefit. This might include holiday provision, additional support for parents and carers or other activities that benefit the families of children that use the child care. It may also include making the premises available to other community groups for their activities.

The council will not provide CBRR where premises are used exclusively or mainly for early years child care.

Public subsidy for day care for children under 5 is funded through central government and administered by the local authority. Providers may be schools, private companies or not-for-profit organisations. The government funding may be supplemented by parental contribution and, where the provider is a not-for-profit organisation, funds may be available from other funders such as trusts and foundations.

Additional public subsidy from a local authority based simply on a child care provider leasing its premises from that local authority with no other consideration of need could be considered as giving it an unfair advantage over other providers. This may reasonably be considered to conflict with the public law principles of fairness and reasonableness.

It may be argued that a local authority could provide support to childcare providers in areas of particular need where provision is inadequate to meet local need or there is a need for specialist provision. This would be based on a needs assessment and decided on a case by case basis. Simply leasing premises from a local authority would not, in itself, be justification for rent subsidy.

The council has made provision in the CBRR scheme for organisations that are providing a mix of activity that is excluded from CBRR, such as government funded child care, and activity that could be considered to have wider community benefit. CBRR may be provided at a lower rate, 40% or 20% depending on the proportion of eligible community activity. Full details are set out in appendix C above.

Faith Based Organisations

Faith based organisations were historically the cornerstone of social welfare services in many areas. Prior to the establishment of statutory social services, many key social welfare services were run by faith organisations and this involvement in community based services by faith based organisations continues. The Covid 19 epidemic also demonstrated the capacity of faith based organisations to respond positively and effectively to changing social needs.

Local authorities and central government continue to support education and social welfare activities run by faith based groups through contracts and grants. This continuing support is based on the principle that publicly funded services must be open to people who do not necessarily share the faith of the organisation delivering the service and that the services are delivered in a manner that does not promote the organisation's faith. Due regard must be paid to this principle. Schemes set up by public bodies to support activity which might be deemed to be promoting faith activity or the promotion of a specific faith have been successfully challenged, including Tower Hamlets Council's faith buildings scheme.

Many faith based organisations in Tower Hamlets deliver services that are inclusive and serve the wider community. Some are supported through grants and contracts with the council. However, some of these services are delivered from premises which are also used for worship and the broader promotion of faith. The council has therefore drafted criteria which will enable organisations whose premises are used for faith related activity to be eligible for CBRR for services that are inclusive and may have a wider community benefit.

1. Where a building used solely for worship and faith-related activities e.g. Arabic/Islamic classes, bible classes etc, it will be let at full market value.
2. Where a building is leased to a faith based organisation but solely used for inclusive community based activity with no faith based activity, it will be let at full market value but the organisation may be eligible to apply for CBRR.
3. Where a building used for worship and faith related activities also has separate space that is used by the local community for a wider range of activities, generally accessed via a separate entrance, the council will carry out an apportionment of the building. This will determine the proportion of the building that may be eligible for community benefit rent reduction (which it is the responsibility of the organisation to apply for).
4. Where there is shared use of the same space, a reduced rate of 40% or 20% CBRR may apply using the principles set out in Appendix 3, Proportionate Rent Reduction

Inclusive activity

A faith based organisation seeking public funds would normally be required to demonstrate that the activities it is seeking funds for are inclusive and open to all rather than being exclusive, open only to congregants and therefore deemed to be integral to the faith base of the organisation. However, where an organisation is serving a specific local area where the majority of the population are active members of a particular faith, it becomes more difficult to determine whether an activity is secular in its intention but, because of the characteristics of the population it serves, appears to be exclusive to those who follow a particular faith.

For the avoidance of doubt, the council will consider a faith based organisation's activities to be inclusive where,

- a) Activities are funded by the council and subject to monitoring and evaluation where an assessment is made regarding inclusivity of activities;
- b) The organisation can provide evidence such as attendance records that its activities are inclusive;
- c) The organisation can show through published material such as its annual report that activities are inclusive, or
- d) The organisation can show it has made reasonable efforts to encourage inclusive participation through promoting its activities in publicly accessible places and minimising religious symbolism in areas where inclusive activities take place.

An assessment of whether activities are inclusive will be included as part of the annual monitoring of CBRR.

Address 1	Address 2	Postcode	Current Lessee/Occupier
COMMUNITY			
Attlee Adventure Playground	Lolesworth Close	E1 6RT	Attlee Adventure Playground,
Barley Mow Veterans Club	40 Three Colt Street	E14 8HJ	Barley Mow Veterans Club
	229 Bethnal Green Road	E2 6AB	Bethnal Green Weightlifting Club
Willian Place Centre ,	1 William Place, Roman Road	E3 5ED	Bowhaven
Trinity Welfare Centre,	Key Close	E1 4HG	Breakthrough (Deaf-Hearing Integration)
Harkness House,	101, Christian Street	E1 1RX	Children Education Group
Compass Point Community Centre	38a, Sextant Avenue,	E14 3DX	Compass Point Community Centre
Delafield House	Christian Street	E1 1QB	Delafield Mother Tongue Project
Dorset Estate Social Club	Ravenscroft Street	E2 7QX	Dorset Estate Social Club
Emmott Close OAP Club	27 Emmott Close	E1 4QW	Emmott Close Senior Citizens Club
Ensign Youth Club	1 Wellclose Square,	E1 8HY	Ensign Youth Club,
	71 Fern Street	E3 3PS	Fern Street Settlement
	135 Commercial Street	E1 6BJ	Greater Sylhet Development & Welfare Council (U.K.)
	3 Lowood Street	E1 0DA	Highway Club,
Legal advice centre	104 Roman Road	E2 0RN	Legal Advice Centre (University House),
St Johns Park Playground Office	Manchester Road	E14	London City Mission
Caxton Community Centre	Malmesbury Road	E3 2EE	Malmesbury Community Projects
Mudchute Park And Farm	Pier Street	E14 3HP	Mudchute association
Osmani Centre,	58, Underwood Road	E1 5AD	Osmani Trust
Raines House (First Floor)	21, Raine Street	E1W 3RJ	Pollyanna
Activity Hall Portacabin,	Glamis Road	E1W 3EG	Shadwell Community Project:
Spitalfields City Farm	Buxton Street	E1 5HJ	Spitalfields Farm Association Limited
Stepping Stones Farm	Stepney Way	E1 3DG	Stepney City Farm
Stifford Community Centre,	2-6, Cressy Place	E1 3JG	Stifford Centre Ltd
	Tench Street	E1W 2QD	Wapping Bangladeshi Association
Weavers Field Adventure Playground	Viaduct Street	E2 0DY	Weavers Adventure Playgroup Association
Weavers Community Centre	10, Shacklewell Street	E2 7EG	Weavers Community Forum
FAITH/COMMUNITY			

Address 1	Address 2	Postcode	Current Lessee/Occupier
	111-113 Mellish Street	E14 8PN	Docklands Community Organisation
Dorset Library	Diss Street,	E2 7QX	Dorset Community Association
FAITH			
St. James (Wellington) Estate Base	73, Bishops Way	E2 9HF	Bishop's Way Community Centre (UK)
Globe Town Mosque and Cultural Centre	100, Roman Road	E2 0RN	Globe Town Mosque and Cultural Centre
Redcoat Community Centre,	256 Stepney Way	E1 3DW	Redcoat Community Centre,
	r/o 40 Turner Road	E3 4LE	Turners and Locksley TRA
Wapping Riverside LHO	19, Prusom Street	E1 9RR	Wapping Bangladesh Association

PLAYGROUP			
Avebury Playgroup,	Roberta Street	E2 6AW	Avebury Playgroup
Cheadle Hall	Copenhagen Place	E14 7EY	Limehouse Project Ltd
Matilda House Nursery	St Katharines Way	E1W 1LQ	Matilda House Nursery and Playgroup
Ranwell East Playgroup,	1, McCullum Road	E3 5HZ	Ranwell Playgroup
Canal Club (temporarily relocated)	Waterloo Gardens	E2 9HP	Scallywags Parent Run Nursery
Chicksand Friendly Club	Hanbury Street	E1 5JY	Somali Integration Team t/a Chicksand Friendly Club
Tate House Playgroup,	Mace Street	E2 0RA	Tate House Playgroup
Vernon Playgroup,	29, Vernon Road	E3 5HQ	Vernon Playgroup
Wapping Womens Centre	Philchurch Place	E1 1PJ	Wapping Womens Centre

COMMUNITY HUBS			
Bow Community Hub	5, Jefferson Plaza	E3 3QE	Bow Community Hub
Christian Street Community Hub	Christian Street	E3	Christian Street Community Hub
Granby Hall Community Hub	St Matthews Row	E2 6DT	Granby Hall Community Hub
Raines House Community Hub	21, Raine Street	E1W 3RJ	Raines House Community Hub
Tramshed Community Hub	Digby Street	E2 0LS	Tramshed Community Hub

TRA			
Barley Mow Tenants Room, Brewster House	Three Colt Street	E14 8HU	Barley Mow TRA
Bentworth Friendship Club	Granby Street	E2 6DN	Bentworth Friendship Club

Address 1	Address 2	Postcode	Current Lessee/Occupier
Birchfield Hall	50 Saltwell Street	E14 0DZ	Birchfield Estate TA
Collingwood Tenants Hall,	Collingwood Street	E1 5RF	Collingwood TRA (Collingwood Estate Friendship Club)
Cranbrook Community Hall	Mace Street	E2 0QT	Cranbrook Estates TRA
Locksley Hall,	Dora Street	E14 7TP	Locksley TRA and THH
Longnor Community Centre	2, Bradwell Street	E1 4GP	Longnor Estate TRA
Ernest Street Community Hall,	Ernest Street	E1 4SE	Ocean Estate TRA
Ogilvie House Hall	1, Stepney Causeway	E1 0JP	Ogilvie House OAP and Pitsea Estate TRA
The Glasshouse Community Hall	161, Old Ford Road	E2 9QB	Park View Estate TRA
Royal Mint Friendly Club	Royal Mint Place	E1 8LS	Royal Mint Tenants & Residents Association
Shadwell Gardens Community Centre	129, Shadwell Gardens	E1 2QL	Shadwell Garden TRA
Flat 2 Jarman House	Jubilee Street	E1 3BL	Sidney Estate TRA
St Mathias Meeting Rooms,	Cottage Street	E14 0AA	St Matthias TRA
St Vincents TRA Portacabins	Gill Street	E14 8AN	St Vincent's Estate TRA
Kedleston Walk Clubhouse	Kedleston Walk	E2 9DR	Teesdale & Hollybush Community TRA
Will Crooks Welfare Centre	1-3, Wades Place	E14 0DA	Will Crooks TRA and SPLASH
Dunmore Point Community Centre	Gascoigne Place	E2 7NP	Wingmore and Gascoigne Neighbourhood Group

VCS occupied premises not in community premises portfolio			
	82 Russia Lane	E2 9LU	Age UK East London
	25-27 Newall Street,	E14 7HP	Tower Hamlets Community Transport
Mayfield House (Ground Floor)	202, Cambridge Heath Rd	E2 9LJ	Women's Inclusive Team
Playgroup Building	55 Buxton Street	E1 5EH	Allen Gardens Playgroup
Jack Dash House (Part)	2 Lawn House Close	E14 9YQ	REAL