APPENDIX



## CAERPHILLY HOMES TASK GROUP – 4TH SEPTEMBER 2018

## SUBJECT: PROPOSALS FOR INCREASING COUNCIL HOUSING SUPPLY

## **REPORT BY: CORPORATE DIRECTOR FOR SOCIAL SERVICES AND HOUSING**

## 1. PURPOSE OF REPORT

- 1.1 The purpose of this report is to advise Members of proposals for increasing the supply of council housing and to outline principles of development mechanisms and options for delivery.
- 1.2 Members are requested to consider the information within the report and provide views on the options to enable officers to further develop proposals resulting in a more detailed report to be brought forward for building new Council homes on specific sites, prior to consideration by the Policy and Resources Scrutiny Committee and thereafter Cabinet.
- 1.3 The report also includes proposals on other options which could be considered for increasing the supply of Council homes.

## 2. LINKS TO STRATEGY

- 2.1 The contents of this report link to the following key strategic objectives:
  - "Encourage the development and maintenance of high quality, well designed and efficient, sustainable homes and environments which can meet all needs." (Community Strategy: Living Environment – Objective 1)
  - "Ensure an adequate and appropriate range of housing sites are available across the County Borough in the most suitable locations to meet the housing requirements of all sections of the population" (Local Development Plan – Objective 9)
  - There is a need to increase the number of affordable homes for purchase or rent (*Improving Lives and Communities Homes in Wales April 2010*)
  - Anti-Poverty Strategy CCBC which sets out a range of priorities to tackle poverty in the borough
  - The Wellbeing of Future Generations Act 2015 contains 7 wellbeing goals. When making decisions the act requires public bodies in Wales to take into account the impact they could have on people living their lives in the future:
- 2.2 The proposal contributes to the following Well-being Goals within the Well-being of Future Generations Act (Wales) 2015:
  - A sustainable Wales
  - A prosperous Wales
  - A healthier Wales
  - A more equal Wales
  - A Wales of cohesive communities

2.3 The Council's Corporate Plan 2018 – 2023 and more specifically Wellbeing Objective 3, address the supply, condition and sustainability of homes throughout the county borough and provide advice, assistance or support to help improve people's health and wellbeing.

## 3. THE REPORT

## Housing Need

- 3.1 The Council's housing stock has been significantly depleted over the years as a result of the Right to Buy process and currently there are approximately 4,300 active applicants on the Common Housing Register seeking a transfer or the allocation of a home.
- 3.2 The following table provides a breakdown of these applicants by housing category, which clearly highlights that there is a need for an increase in general accommodation and in particular, smaller units of accommodation for single persons.

Household Composition	General Needs	OAP – Not selected sheltered	OAP – Selected Sheltered and OAP	OAP – Selected Sheltered Only	Total
Adult (single)	1386	342	353	52	2133
Adult (single) with access	81	2			83
Adult or couple plus 1 other	539	70	23		632
Adult or couple plus 2 other	323	10			333
Adult or couple plus 3 other	146	2			148
Adult or couple plus 4 or more other	75	1			76
Adult or couple with child expected	73				73
Couple with access	9	1	1		11
Couple with no children	247	321	218	21	807
NULL	1				1
Grant Total	2880	749	595	73	4297

- 3.3 The number of homelessness presentations to our offices in Caerphilly have increased threefold over the last 2 years and whilst to date we have been very successful in preventing homelessness in many cases, it is apparent that the majority of presentations have been from single persons which supports the evidence that there is a lack of suitable smaller units of accommodation available in the county borough.
- 3.4 Work is nearing completion on our Local Housing Market Assessment and data gathered suggests that an additional 282 units of affordable housing are required per annum to meet demand and also recognises that there is a particular demand for single person accommodation.
- 3.5 This information can be broken down as follows:-

169 social rented units.113 intermediate units, e.g. intermediate rent and low cost home ownership.

- 3.6 The CCBC Local Development Plan up to 2021, identifies an affordable housing target of 964 units to be delivered through the planning system using Section 106 Agreements on qualifying sites. The delivery of affordable housing through the planning system will make a contribution towards meeting housing need.
- 3.7 As of the 2017 Annual Monitoring Report, 251 affordable units had been built since the start of the plan period, which is less than a third of the overall target. A detailed report

on "Affordable Homes in New Developments" was submitted and considered by Policy and Resources Scrutiny Committee on the 10<sup>th</sup> April 2018.

- 3.8 Whilst the council has worked very successfully with its Housing Association partners to deliver new affordable housing, there has been no new council housing development mainly due to funding limitations. However, in order to maximise opportunities to contribute to Welsh Government's ambition to build 20,000 additional affordable homes in Wales by 2020, new funding proposals have been made available by WG and the Housing Business Plan indicates that the Housing Revenue Account could support new developments.
- 3.9 Welsh Government has recently announced that the Housing Finance Grant programme will be extended to Local Authorities to support opportunities for new build Council housing. This is known as Affordable Housing Grant (AHG) (Formerly part of Housing Finance Grant Phase 2). The previous HFG grant only allowed Housing Associations to access the grant.
- 3.10 Where such developments can be undertaken without the authority incurring any land purchase costs e.g. HRA owned land, then the capital cost of the scheme considered for AHG will be reduced by 20%. The proposals contained within Table 1 of this report only includes schemes for development on HRA owned land, therefore the figures quoted have been reduced accordingly. WG have also indicated that the AHG could also be utilised to purchase existing properties, e.g. empty homes, to support these being brought back into beneficial use.

## Affordability

- 3.11 The potential new housing units would form part of the Councils Housing Revenue Account (HRA) stock allocation and would be managed and maintained under the statutory ring-fenced account criteria that is followed for all existing council house stock. It should be noted, however, that the AHG will be paid to the Authority over a 30 year period and so the Authority needs to secure 100% of the capital costs to facilitate the commencement of any development. The total cost of any borrowing will need to be incorporated within the Housing Business Plan which must remain financially viable and must also be included within the current borrowing cap limits recently imposed on the HRA. In order to comply with the funding criteria, all developments must be approved by WG before March 2020. WG are currently considering extending borrowing cap levels to support new developments, but at the time of writing this report no decision has been made.
- 3.12 The latest business plan submitted to Welsh Government suggests that there is scope within the HRA borrowing cap to consider new build and/or acquisition options as well as fund the WHQS programme.
- 3.13 The HRA borrowing cap is £180m which includes pre-existing historical debt and the debt for the recent subsidy buy out. The borrowing for WHQS currently allows for some £34m (19%) flexibility before the cap is breached, based on projections to the end of the WHQS programme in 2020. Also the full cost of any development is taken against our borrowing limits even though only 42% of the build cost is the actual cost to the HRA.
- 3.14 In order to deliver the full programme identified in Table 1, a total investment of £4,974,500 would be required and is deemed to be affordable within the Business Plan based on the assumptions made within item 3.18 of this report. However, whilst the Affordable Housing Grant (AHG) would fund 58% of the build cost, in order to comply with the grant conditions the schemes would need to commence on site prior to the 31<sup>st</sup> March, 2019, in order to receive this year's allocation. Due to the timescales involved, the requirement for feasibility studies to be undertaken, planning approval to be

obtained and a procurement process to appoint a developer, it would not be possible to access this year's allocation for new developments.

- 3.15 Caerphilly's allocation of AHG for 2019/20 is £1,812,867 and it is therefore proposed that feasibility studies be carried out for all sites listed in Table 1 to determine which of these could be progressed in line with the grant conditions.
- 3.16 Members must be advised however that the WHQS programme is a moving programme that evolves daily as condition surveys on our existing stock are carried out. There is a regular re-profiling review to ensure resources are in place to meet the works required. Weather conditions and contract performance are also drivers for the success of completing the programme by the statutory deadline.
- 3.17 HRA balances are fully committed towards the WHQS Programme together with borrowing requirements of some £45m. Therefore to fund new development and/or acquisitions further borrowing will be required.
- 3.18 The maximum borrowing of £34m would be affordable by the HRA, but this is based on the following assumptions which are outside the direct control of officers or members and therefore they could be subject to change.
  - General inflation over the five years up to 2025 has been assumed as 2%. This is based on the UK government's current inflation, but could be subject to change due to the economic climate, Brexit, legislation, etc.
  - Rent increases are projected at 3.60% for the 2018/19 financial year in order to comply with WG rent policy, but this has then been reduced to 3% for each subsequent year. A new rent policy is awaited from WG so at this time rent increases are difficult to predict, although there has been a significant reduction in England.
  - A provision for bad debt, including void rent loss, has also been incorporated into the projections. 6% has been allowed for within 2018/19, but this has been increased to 7% for the following years, to take into account the implementation of Universal Credit and increased levels of financial hardship on our customers.
  - Staff costs have been assumed to rise by 2% over the next 4 years but increased to 2.5% from year 5.
  - Maintenance and construction cost increases of 3% have been incorporated into the business plan, which again is built on historical and current trends. Such increases are subject to market conditions, legislation and Brexit, so are difficult to predict with any certainty.
  - A future asset management programme has been costed and budgeted for within the plan, based on historic actual costs and projected future workload. This includes £14m for our general asset maintenance programme, £2m for remodelling one of our sheltered housing schemes each year, £1m per annum for carrying out works of adaptation to our properties based on tenants' specific needs, £2m to support energy efficiency initiatives and provide match funding to possible WG grants and a £1m contingency budget for unforeseen requirements. This equates to a total allocation of £20m p.a. for the delivery of an asset management programme from 2020-25. Obviously the above projections are also linked to the previous assumptions made, so could be subject to change.
- 3.19 In this respect a cautious phased approach is being proposed based on the Business Plan projections made up to 2025 only. This will hopefully limit the impact of any

unforeseen changes on our plan. The plan will continue to be reviewed on an annual basis.

## 4. OPTIONS FOR INCREASING COUNCIL HOUSE SUPPLY

## **Potential Sites for Delivery**

4.1 A selection of potential development sites are provided in Table 1, but these are subject to detailed feasibility studies being undertaken to ensure the sites are viable and will be subject to planning approval. If the sites are supported and feasible, these homes could be delivered in line with the needs identified within the Council's Local Housing Market Assessment and the Common Housing Register.

# Table 1 – HRA Council New Build Sites prioritised by housing need, land availability and deliverability.

Site	Number Of Homes	Estimated Total AHG	Estimated Build Cost
Penyrheol – Phase 1	7	£462,260	£797,000
Trecenydd	6	£341,040	£588,000
Penyrheol – Phase 2	15	£900,450	£1,552,500
Risca - Phase I	12	£840,420	£1,449,000
Blackwood	6	£341,040	£588,000
Total	46	£2,885,210	£4,974,500

## HRA Purchase Land from General Fund/Open Market

- 4.2 There is the option for the HRA to purchase General Fund or private land at market value or provide a leasing option with the land providing a revenue income stream for the General Fund. The leasing model is currently being piloted at the Watford Road site and has been approved for the Windsor Colliery development, although these leasing arrangements have been agreed with the Council and a local RSL partner.
- 4.3 Potential development sites have been identified and will be considered in consultation with the Interim Head of Property, the Cabinet Member for Homes and Places and relevant ward members, e.g. Ty Darren.
- 4.4 Some sites in the Risca area offer potential to develop a new sheltered housing scheme rather than progress the remodelling of three existing schemes in Risca. There may also be the opportunity to work collaboratively with the Health Board and Social Services on the Ty Darren site which could extend development opportunities. The cost of a new sheltered scheme is anticipated to be in the region of £6m, which is similar to the remodelling of the three schemes, however such a proposal could also be supported by the AHG or alternative grants such as the Innovative Housing Grant, Health and Housing Programme.

## **Redevelopment of Existing HRA Sites**

4.5 In order to meet changing demand and ensure that our housing stock continues to be fit for purpose, it may be more economical to demolish some of our existing stock and redevelop the site. Examples include some of our sheltered housing schemes, which is covered in more detail in a separate report, but may also include other stock such as blocks of flats, e.g. Lansbury Park. As undertaken with the sheltered housing schemes, these options would require feasibility studies and separate reports to be submitted on any proposals.

## **Section 106 Agreements**

- 4.6 There is an option to deliver Council homes through the planning s106 route. This would mean that private sector developers could be required to transfer homes at the values contained within the Councils Supplementary Guidance on Affordable Housing. These homes would be developed without the need for Welsh Government Grant. This would add to the Council's existing Social Housing stock. Examples of sites which could lend themselves to such an option include the former Oakdale school site and the Pontllanfraith council office site.
- 4.7 A similar approach could also be adopted by agreement with developers whereby the Council could agree to purchase properties directly from the developer, which may assist with the financial viability of a scheme. This could be outside of the Section 106 Agreement process and therefore an individual business case would need to be considered for any potential project.
- 4.8 The benefit of this approach is that there would be no staff resource or procurement implications. The developer would deliver a pre-determined number of properties based on our specification requirements and transfer these to the Council at the current values which are indicated below:-

Discounted Fixed Values for Social Rented Units				
Unit Type	Туре	Values		
1 Bed 1 Person	Flat	48704		
1 Bed 2 Person	Flat	48723		
2 Bed 3 Person	Flat	55121		
2 Bed 3 Person	House	67372		
2 Bed 4 Person	House	67391		
3 Bed 4 Person	House	67742		
3 Bed 5 Person	House	67722		
4 Bed 6 Person	House	82239		
4 Bed 7 Person	House	82219		
2 Bed 3 Person	Bungalow	69055		
3 Bed 5 Person	Bungalow	82239		

## Acquisition of Existing Properties

4.9 The existence of empty properties is a national problem which is often not only a waste of a much needed resource at a time of increasing housing demand, but can also result in complaints and problems with anti-social behaviour. There is the potential for the

HRA and AHG to support the purchase of existing private properties, including former Council owned properties which were sold through the right to buy process. Such acquisitions should be of a type and location that supports Caerphilly Homes' ability to meet housing need and provides value for money in terms of purchase costs and future maintenance when these assets come into the Council's housing stock. Currently demand is for smaller units of accommodation particularly in the mid and south of the county borough and could encompass commercial premises.

- 4.10 This process may also assist the aim of bringing empty properties within the county borough, which have willing vendors, back into beneficial use. This will not only assist in meeting housing demand, increase options for addressing homelessness, but also improve the street scene and our communities as a whole, as well as regenerating areas, including our town centres. These areas could be the particular focus of such an acquisition, but demand is subject to change and such an agreement would need to be flexible to accommodate such a change.
- 4.11 These suggestions would be subject to acceptable business cases being developed in consultation with the Cabinet Member for Homes and Places to support such acquisitions to contribute towards meeting housing need, improving/regenerating communities and addressing customers' specific needs, e.g. accessible housing, the AHG could be used to support such acquisitions.

## **Specification of Homes**

- 4.12 The specification used to design the new Council homes will be key to the success of the new build programme. The specification of works will affect:
  - The build and material costs.
  - The cost of heating, lighting and living in the home for future tenants.
  - The Authority's ability to attract grant funding from WG to help fund the building of the new homes.
  - Energy efficiency performance and carbon emissions.
  - Future ongoing maintenance and repair costs.
  - New build delivery timescales.
- 4.13 In order to comply with the AHG requirements, the homes will need to be built to a minimum standard of:
  - Design Quality Requirements (Which exceeds WHQS)
  - Lifetime Homes
- 4.14 Furthermore, any opportunities to provide digital technology will be maximised in order to offer "homes for life" thereby positively contributing to the wider health preventative agenda.

## Possibilities for Alternative Funding

- 4.15 There are potential options for the delivery of exemplar projects through WG's Innovative Housing Programme. This would depend upon funding becoming available within the timescales. The allocation of such funding would require a specific project bid with high specification energy efficient homes having an increased likelihood of success.
- 4.16 WG has issued a health and housing programme and this fund has the potential to assist with the delivery of a combined housing and health scheme. Both funds are time limited and linked to the delivery of schemes by March 2021. The funds are available to assist with the delivery of the 20,000 affordable homes target so a scheme would need to be developed which attempted to maximise on the funding options currently available. This source of funding may be particularly applicable to the previous proposal made for the Risca area.

- 4.17 Once a site is identified, a development is likely to take between 18-24 months to construct. These opportunities could also deliver an innovative, combined health and housing project for older people/persons within the County Borough.
- 4.18 The development option chosen by the Authority for building new Council homes could have a significant impact on value for money and maximising the wider benefits of the investment by keeping the pound(£) local, creating jobs and training opportunities, promoting sustainable communities and supporting the local supply chain.

## 5. PROCUREMENT OPTIONS FOR NEW DEVELOPMENTS

5.1 Based on the Council utilising the AHG, the development approach would be subject to compliance with procurement legislation, but may include one or a combination of five main options. These are summarised in **Table 2** below:

Option	Comment
<b>Option 1</b> Utilising the services of a Housing Association	Our current zoned Housing Association partners are already experienced in the field of housing development and may be in a position to project manage schemes on behalf of the Council. This however would require a procurement process to be undertaken and confidence that the H.A. has the capacity to deliver.
<b>Option 2</b> Open Market Approach	Specialist house building design, project management developers would be invited to tender for the schemes on the open market.
	The procurement process would take between 9 to 12 months to secure a contractor, but resources would be required to develop an initial project specification.
	This appointment process would need to be repeated for each scheme unless a specific framework was created. Development of smaller sites could support the use of Small/Medium Enterprises (SME's).
	Allocations for the new homes would be via the Common Housing Register.
	As part of the social inclusion clause within the contract, the successful contractor could deliver a training programme for apprenticeships as well as permanent job opportunities. Apprenticeship transfer option.
<b>Option 3</b> Creating an in-house Council House Building Team	The Authority would need to establish a new in-house design and project management and building team. Whilst we have an experienced Building Consultancy section, this Authority has never built Council homes and consequently currently lacks expertise/resources in the delivery of new build housing.
	The funding is time limited and there is no indication of future

## Table 2 – Development Options for AHG

	funding being forthcoming, in which case any in-house team would need to be set up quickly. The establishment of such a team would require substantial additional resources The Council houses could be delivered by a project manager (e.g. Building Consultancy) and monitored by Caerphilly Homes which would require additional resources. Allocations for the new homes would be via the Common Housing Register.
Option 4 Arms Length Development Company	Some Welsh Authorities have already developed ambitious plans to deliver Council Housing. For example, a model has been developed by Flintshire County Council called Strategic Housing and Regeneration Programme (SHARP). An integral element of SHARP is to support the achievement of the strategic objectives of Flintshire Council's regeneration strategy: <i>"a competitive Flintshire; sustainable communities and the creation of employment and skills".</i> This initiative includes a number of training and apprenticeship opportunities for local people and, having already built approximately 40 homes. It should be noted, however, that although this initiative is an option for consideration by Caerphilly CBC, its development at Flintshire was extremely lengthy. Allocations for the new homes would be via the Common Housing Register.
<b>Option 5</b> Existing Frameworks	Investigate possibilities for using existing frameworks to design and project manage development sites or provide a complete design and build service. This may not support the use of local SME's.

- 5.2 If members are minded to support the development of new council housing it is proposed that this be progressed in a phased way due to the impact of financial and staff resources. Officers therefore recommend that Options 2 and 5 should be the preferred approach, subject to further detailed reports being submitted on specific schemes.
- 5.3 Proposals to increase the supply of Council homes within the borough present a unique opportunity to create opportunities for residents who are currently unemployed or economically inactive. As a result, a suite of core and non core community benefits will be included into any contracts that are awarded thereby requiring the contractor, not only to deliver new homes, but also to create new employment opportunities, work placements and apprenticeships that, where appropriate align with the Council's WG funded employment support programmes. The creation of new Council homes would also present an opportunity for those who are NEET and furthest from the labour market to participate in a shared apprenticeship programme which could form one element of the Council's apprenticeship scheme currently under development. Additional community benefits could include the transfer of business acumen between contractors and local schools, a community fund and local schools / colleges benefiting from an enhancement to the Careers Wales Business Class programme.

## 6. WELL-BEING OF FUTURE GENERATIONS

- 6.1 This proposal contributes to the Well-being Goals as set out in Links to Strategy above. The proposal is also consistent with the five ways of working set out in the sustainable development principle, as defined in the Act. The proposal is integrated in that it contributes to a number of the Well-being goals and supports the objectives of other stakeholders within the community. Implementation of the scheme exemplifies collaboration and involvement across organisational boundaries; working together for the good of our communities in pursuit of shared objectives.
- 6.2 The developments will provide long term investment within communities, protecting (as far as possible) and improving the local environment and infrastructure for the future. The developments will bring an emphasis on sustainable construction and Targeted Recruitment and Training that will enhance employment prospects and skills of local people, particularly the young and those at a disadvantage, and promote equality of opportunity. The initiative as a whole will assist in meeting the Welsh Government's target of building 20,000 affordable homes by 2020, thereby preventing problems associated with the lack of affordable housing from escalating.

## 7. EQUALITIES IMPLICATIONS

7.1 An EIA screening has been completed in accordance with the Council's Strategic Equality Plan and supplementary guidance. No potential for unlawful discrimination and/or low level or minor negative impact has been identified; therefore a full EIA has not been carried out.

## 8. FINANCIAL IMPLICATIONS

- 8.1 To utilise the AHG funding, the total amount required for any development/acquisition must be made available from the HRA/borrowing as the total capital cost. Housing will then receive a revenue contribution from W.G. to fund the borrowing which will be paid annually over a 30 year period. Members will be aware of the Councils priority to achieve the Welsh Housing Quality Standard (WHQS) by 2020 and this must remain the priority regardless of new initiatives that could divert financial resource away from the WHQS programme.
- 8.2 Whilst WG have made an allocation of AHG available to authorities this financial year, CCBC like many other authorities, are not in a position to meet the grant conditions for new developments within 2018/19.
- 8.3 The Housing Business Plan up to 2025 has been populated using current rates, plus inflation for each year and based on the proposed asset management delivery plan. This includes anticipated expenditure per annum on statutory maintenance, reactive repairs, asset maintenance programme, remodelling sheltered schemes, works of adaptation and energy improvement works.
- 8.4 The asset management strategy assumes the completion of the WHQS programme by 2020 and sets out proposals for ensuring the standard is maintained thereafter. The projections made within the Business Plan will be subject to the strategy being approved as proposed, but if any changes are made to the strategy, the Business Plan will need to be reviewed and updated accordingly.
- 8.5 Prudent measures at this time may be to tackle a small number of new build projects that will not greatly impact on the borrowing cap flexibility or affect our ability to achieve the WHQS programme. This will also give the Council an opportunity to test the new

grant while it is in its infancy, develop the required contact arrangements for delivery and undertake detailed feasibility studies on specific sites.

8.6 At the time of writing this report WG are also currently reviewing the borrowing cap limitations and it is possible that the cap could be increased for those authorities committed to developing new homes.

## 9. PERSONNEL IMPLICATIONS

9.1 Currently there is insufficient resource capacity within Caerphilly Homes to progress the development of new Council homes. The resources required would depend on the preferred option chosen from Table 2 for the development of schemes.

## 10. CONSULTATIONS

10.1 The views of consultees have been included within the report.

## 11. **RECOMMENDATIONS**

That Members consider the following and provide comments for consideration by the Policy and Resources Scrutiny Committee and thereafter Cabinet :-

- (1) Agree to the principle of building new council homes and access the AHG in full or in part.
- (2) Agree the HRA sites to progress with detailed viability studies and agree the principle of identifying and pursuing suitable General Fund or open market sites for the development of affordable housing.
- (3) Agree to the transfer and purchase of new homes through Section 106 agreements where there is an identified housing need and associated business case.
- (4) Agree to the selective acquisition of existing properties to support housing need and subject to value for money being demonstrated, as set out in item 4.7 and 4.8 with individual acquisitions being progressed in consultation with the Cabinet Member for Homes and Places.
- (5) Agree to a review of resources to support the preferred approach.
- (6) Consider the report and the delivery options outlined and provide guidance on the officers' preferred Options 2 and 5 with the aim of the Council accessing AHG and delivering new council homes within the stated timeframes, i.e. 2019/20.
- (7) Agree to the submission of future reports for approval providing more detail on any viable development sites for new Council home provision.

#### 12. REASONS FOR THE RECOMMENDATIONS

- 12.1 To utilise the AHG funding that has been made available by Welsh Government by 2020 and assist Welsh Government to achieve 20,000 homes.
- 12.2 To increase the supply of Council homes that meet with the needs identified within the Council's Local Housing Market Assessment and Common Housing Register.

## 13. STATUTORY POWER

Section 9, Housing Act 1985.

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- Consultees: Cllr Lisa Phipps Cabinet Member for Homes and Places Christina Harrhy Interim Chief Executive Dave Street Corporate Director of Social Services & Housing Stephen Harris Interim Head of Corporate Finance Lisa Lane Interim Monitoring Officer Public Sector Housing Manager Fiona Wilkins Interim Private Sector Housing Manager Claire Davies Housing Development Officer Kevin Fortey Rhian Kyte Head of Regeneration & Planning Tim Stephens Development Control Manager
- Appendices: Appendix 1 Business Plan Summary Appendix 2 – Business Plan Assumptions