



Report To:	Council
Date:	9 th October 2024
Subject:	Delivery of the ELDC Temporary Accommodation Programme Utilising the £1million funding allocated through the Council's Capital Programme and the award of DLUHC LAHF 3 funding for Temporary and Resettlement homes.
Purpose:	Following Executive Board approval on September 18 th 2024, to secure Full Council approval to amend the council's Capital Programme to deliver the ELDC Temporary Accommodation Programme, including Local Authority Housing Fund 3 programme funds from government.
Key Decision:	N/A
Portfolio Holder:	Cllr William Gray – Executive Portfolio Holder for Communities and Better Ageing.
Report Of:	Matthew Hogan, Assistant Director Strategic Growth and Development.
Report Author:	Helen Forman, Housing Strategy and Enabling Officer and Andrew Sweeney, Housing Development Manager.
Ward(s) Affected:	All wards.
Exempt Report	No Appendix A to this report is exempt by virtue of paragraph 3 of Schedule 12A of the Local Government Act 1972 because it contains commercially sensitive information.

Summary

In September 2023, Executive Board agreed to provide £1m to increase the Council's temporary accommodation (TA) stock. Subsequent to this decision, Full Council approved the amendment to the 2023/24 Capital Programme budget to include this provision.

More recently, the Council has been notified by DLUHC of the award of £1.067m grant in response to its Local Authority Housing Fund (LAHF) Round 3 expression of interest for the delivery of further re-settlement homes and temporary accommodation units.

In light of the LAHF 3 funding offer, on September 18th 2024 the Executive Board met and formally agreed the following;

- To take part on the Local Authority Housing Fund Round 3 programme, with a view to bringing 12 properties into the council's ownership to meet short, medium and long-term housing needs within the district.
- The approach to be adopted in respect of the spend of the funds, including type, priority location and delivery approach. This approach is detailed within this report.
- To delegate authority to the Assistant Director of Strategic Growth & Development, in conjunction with the Portfolio Holder for Communities and Better Ageing, to finalise and agree the terms of the Memorandum of Understanding (MOU) for the LAHF Round 3 programme with DLUHC and:
- To recommended to Council that the 2024/25 capital programme, as set out in Appendix 2, is amended to reflect the LAHF 3 funds.

Following approval of the above by the Executive Board, this report therefore seeks Full Council approval on the matter of amendments to the 2024/25 capital programme, as set out in Appendix 2.

Recommendations

That Council approves;

- i) The Council's 2024/25 capital programme is amended to include the £1.067m in Local Authority Housing Fund Round 3 funds, taking the council's total capital budget for temporary accommodation investment to £2.067m

Reasons for Recommendations

1. To deliver the programme to increase the supply of Council owned general fund temporary accommodation and re-settlement homes following the allocation of £1m Council funding and a further £1.067m grant towards the LAHF programme.
2. To meet short term needs of homeless households within East Lindsey district.
3. To increase the number of homes owned by the authority and enable the authority to directly deliver housing solutions to issues within the district.
4. To enable the authority to act swiftly to secure the acquisition of suitable properties identified to meet the needs of residents of the district.
5. To reduce the need to use costly bed and breakfast accommodation as temporary accommodation.

Other Options Considered

Do nothing - In this event the authority would not proceed with the purchase of properties. As a consequence, the expected benefits set out in the Reasons for Recommendations section of this report would not be realised with no increase in housing supply in the district achieved to address need.

Alternative properties – Officers considered a range of options on the types of property that could be acquired to deliver temporary and resettlement homes. Following evaluation of these and taking account of cost, size, location, flexibility, management implications and general suitability, the preferred options set out in the report have been arrived at. The option to acquire new build homes for further Re-settlement homes and suitable second-hand properties on the market for conversion to 1-bed homes are considered the most appropriate way to deliver the programme.

1. Background

- 1.1 In October 2023 the Council approved funding of £3.07m to support the delivery of temporary accommodation to meet the needs of residents in East Lindsey. This funding was set aside to support in two main areas;
- £2,070,000 to support the delivery of 9 homes under Round 2 of the Local Authority Housing Fund programme. This was subsequently extended to 11 properties due to financial savings within the LAHF programme, providing 8 properties for households displaced through conflict in Afghanistan, coupled with 3 properties for use as general temporary accommodation by families.
 - £1,000,000 to support future, further investment in temporary accommodation, through a strategy to be developed.
- 1.2 The delivery of the LAHF 2 programme was successfully achieved in April with the delivery the nine homes included in the original bid plus a further two homes delivered utilising an underspend on the grant and Council's match funding. All properties delivered are now occupied or matched with potential tenants, and the three family homes secured as temporary accommodation for use by the council's homelessness service are supporting the authority in minimising use of bed and breakfast accommodation.
- 1.3 In respect of the further £1m set aside alongside the LAHF 2 programme, work has since progressed on the review of evidence for where this funding might be best utilised. This evidence review has identified a need to bring about an increase in the supply of one bed self-contained temporary accommodation properties.
- 1.4 In parallel to work commencing on the evidence review to support decisions around the investment of the £1m, the government launched the Local Authority Housing Fund Round 3. Like Round 2 which has already funded investment in accommodation in East Lindsey, this fund has two core aims;
- To support in providing more suitable accommodation and affordable accommodation for Afghan families, who arrived in the UK legally, until their visas expire in c 3-5 years' time.
 - To support local authorities in meeting their duties to accommodate such families if they present as homeless, therefore relieving pressure on wider local housing challenges and constraints.
- 1.5 Local authorities were invited to submit expressions of interest for LAHF Round 3. However, unlike LAHF Round 2 (which was heavily weighted towards accommodation

for Afghan families), LAHF Round 3 allows local authorities to weight their EOIs towards funding support for general temporary accommodation as opposed to further Afghan resettlement homes. However, local authorities are still expected to support households from both cohorts in order to access funding.

- 1.6 Accordingly, given the developing strategy to direct the existing £1m towards one bed temporary accommodation to meet general needs within the homelessness service, an EOI was submitted for LAHF3 funds based on the following split;

Property type	Year 1 delivery target (2024-25)	Year 2 delivery target (2025-26)	Total delivery target
TA element 1 bed homes	3	4	7
TA element 2-4+ bed homes	1	0	1
Resettlement element 1 bed homes	0	0	0
Resettlement element 2-3 bed homes	3	0	3
Large Resettlement 4+ bed homes	0	0	0
All property types	7	4	11

- 1.7 Subsequently, in late July, the authority received an offer of £1.067m under the Round 3.

- 1.8 It is estimated that the £1.0m Council funding will deliver six 1-bed self-contained homes. This is based on current comparable cost data for acquisition, works and fees. In accepting the offer of the LAHF funding of £1.067m it will enable the Council to deliver eight 1-bed homes and a further four family homes in the district. (12 No in total). Therefore, in accepting the LAHF funding, there is a view that the authority will be able to maximise the delivery of one bed properties, alongside securing a further four to meet housing needs in the short, medium and long term. The anticipated delivery utilising the funds would be as follows;

- 9 properties for general temporary accommodation
- 3 properties for resettlement accommodation, to be utilised in the short term (3-5 years) by families displaced from conflict in Afghanistan, and by the council more generally as temporary accommodation into the longer term when those properties are no longer needed by the Afghan cohort. This follows the approach taken under LAHF Round 2.

Property type	Year 1 delivery target (2024-25)	Year 2 delivery target (2025-26)	Total delivery target
TA element 1 bed homes	4	4	8
TA element 2-4+ bed homes	1	0	1

Resettlement element 1 bed homes	0	0	0
Resettlement element 2-3 bed homes	3	0	3
Large Resettlement 4+ bed homes	0	0	0
All property types	7	4	12

1.10 As set out earlier in this report, following council agreement to set aside £1m for general temporary accommodation investment, a detailed analysis of the temporary accommodation needs of residents has been carried out to ascertain the level of demand and most suitable and deliverable form of temporary accommodation provision to meet the needs of residents. This analysis has considered trends and data from the homelessness service in terms of locations of service demand, evidence of acute pressures, types of need and demand (including the complexity of needs of service users) and considerations relating to management and operational delivery.

1.11 This analysis has defined the following as a preferred strategy for priority investment in further temporary accommodation;

- In the context of recent investment in family accommodation, a need to bring about an increase in the supply of one bed self-contained temporary accommodation properties. This would be aimed predominantly at contributing to meeting the needs of single households but also assist in accommodating the needs of couples with no children in areas with access to facilities, employment opportunities and transport networks.
- Small clusters of self-contained accommodation (i.e. 2-4 units), as opposed to consolidating all accommodation into a single 'hostel-style' property.
- A preferred delivery strategy around conversion of larger properties into self-contained accommodation which will allow flexibility in the event of future potential disposal, as opposed to new build or bespoke 'hostel style development.
- In terms of location, a priority geographic hierarchy as follows; Louth and Skegness as a joint first priority, with Horncastle as a secondary priority area.
- For support to household to be provided through a 'floating support' model

1.12 On the basis of the information detailed above, Louth and Skegness areas have been identified as the two priority areas for an increase in temporary accommodation provision. However, it is considered that the Horncastle area should also be considered given the level of need. The Council does not currently have access to any single person accommodation in Horncastle meaning local people have to move elsewhere in the district if they become homeless.

Temporary accommodation delivery options

1.13 As set out above, a number of options have been explored for delivery of one bed TA homes. These are detailed below:

- a) **New Build Properties.** The option of new build was explored, including use of modern methods of construction, also known as 'modular' or 'pods'. However, currently, most sites on the market present challenges in terms of delivery and

viability. Other challenges exist in some areas for new build, including the inability to provide ground floor sleeping accommodation in flood risk zones and a lack of new build one-bed units being developed and readily available.

- b) Purchasing Existing Satisfactory Properties.** There are very few homes suitable for use as one bed units available for sale on the second-hand property market. Of those one-bed units on the market, all explored were for leasehold rather than freehold sale.
- c) Conversion of B&B's or Guest houses.** There are currently a significant number of bed & breakfast and guest houses for sale in Skegness. Viewings have been carried out on some of these properties. However, these have been discounted on the following grounds:
- Most are too large to convert to a manageable number of units in housing management terms. i.e. they would provide a concentration of homeless residents in one area rather than the preferred dispersed homes.
 - Most are priced high – so the acquisition and conversion cost would be prohibitive.
 - Many are in poor condition – Repair costs would further impact on the viability of acquiring and converting the property.
- d) Conversion of Existing Properties.** A number of properties are currently on the market (including ex-council properties). Some are large and built to reasonably high space standards, each with similar internal layouts. These units would lend themselves to conversion to provide two one bed flats, each with their own individual access and self-contained accommodation with no element of sharing. Delivery timescales quicker than new build.

- 1.14 After exploring the options available and carrying out a full assessment of the properties on the market, the purchase of existing properties of sufficient size for conversion (under option d) is considered the most appropriate solution to meet the identified needs.
- 1.15 It is however recognised that in Skegness, planning policy on flood risk may require a variation to the approach set out at item 1.14 above, where ground floor sleeping accommodation is not permitted. The acquisition of smaller 2-bed properties with first floor sleeping accommodation, acquired and refurbished within a similar cost envelope to conversions will be considered as an alternative in such cases. Examples of these properties currently exist on the market.

LAHF 3 Re-settlement Homes

- 1.16 It is proposed that for the delivery of the family homes under the resettlement element of the LAHF programme, local developers be approached to acquire new build homes. This proved successful across the SELCP in the previous LAHF 1 and 2 programmes in terms of delivery. Some developers previously involved have expressed a willingness to provide further homes for this purpose.

Criteria for Properties for Conversion to TA Homes

- 1.17 Examples of types of properties currently available on the market that are suitable for conversion are ex-Council properties presently on the market in the Louth,

Skegness and Horncastle areas. These could convert into 2No 1-bed flats. They also have good space standards and are usually of sound construction. The highest demand on the housing register is for one bed accommodation, therefore if these properties were no longer required as temporary accommodation, they could easily be used for general needs use. The properties are therefore considered sustainable.

- 1.18 Typical houses currently on the second-hand property market considered suitable for conversion and assumptions on conversion costs are as set out in Table 1 of the exempt information included at Appendix A.
- 1.19 These acquisition and cost assumptions along with those for the new build acquisitions have been assessed using the Councils financial model and incorporated in the overall programme appraisal included at Appendix 1, table 2. Further financial appraisals will be completed as part of the business case submissions for delegated decisions on a case-by-case basis for both new build and conversion options.
- 1.20 The tenants of these homes will be issued a non-secure licence agreement, granted to homeless households as part of any function under Part 7 of the Housing Act 1996 and as the homes are not let on Secure Tenancies residents will not have a Right to Buy their home.
- 1.21 Current rents chargeable on 1-bed TA homes are £111.98 per week affordable rents. This to ensure that the homes are affordable to occupiers supported by welfare benefits. Rental income assumptions are shown at the financial appraisal at Appendix A, together with assumptions on voids losses, bad debt, management and maintenance costs.

Due Diligence

- 1.22 Prior to finalising the purchase of properties, a robust due diligence exercise will be undertaken to ensure the properties provide good title and are suitable for conversion.
External legal services will be employed to advise on and agree the sale contracts. Resource will also be allocated to ensure the properties meet the required design and construction standards and all documentation is provided.

Statutory Approvals

- 1.23 Initial consultation with the Council's Development Control and Building Control teams has taken place on the feasibility of converting houses to flats and in principle support obtained. This is however subject to the submission of more detailed information for approval where required under the Town and Country Planning Act and Building Regulations.

Management Arrangements and Strategy – ELDC General Fund Housing

- 1.24 With the acquisition of the LAHF Round 2 homes there has been a gradual increase in the Council's housing stock. It is considered that to a degree the current portfolio can be managed by existing resources. It is however recognised that as the housing portfolio expands it will be necessary to have in place a more structured and adequately resourced approach to managing the stock with regards to housing management and landlord's duties.

1.25 A review of the current management arrangements is underway with an external consultant supporting the review to provide an objective viewpoint and recommendations to contribute to the development of an appropriate management strategy. As part of the exercise options on how services can be delivered will be considered, including the potential to utilise SELCP wide resources if appropriate. The findings of this review will be available by late October 2024.

2. Conclusion

2.1 This report sets out proposals as follows;

- A proposal that the council agrees to take part in the Local Authority Housing Fund Round 3 programme, with a view to bringing 12 properties into the council's ownership to meet short, medium and long-term housing needs within the district.
- That the approach of acquiring properties in the district suitable for use as re-settlement and TA units through the acquisition of new build homes and properties on the second-hand property market suitable for conversion, as set out in the business case in the report, is approved.
- That authority is delegated to the Assistant Director of Strategic Growth & Development, in conjunction with the Portfolio Holder for Communities and Better Ageing, to finalise and agree the terms of the Memorandum of Understanding (MOU) for the LAHF Round 3 programme with DLUHC and:
- That it is recommended to Council that the 2023/24 capital programme, as set out in Appendix B, is amended to reflect the LAHF 3 funds.

2.2 If the recommendations set out in this report are agreed, the next steps are as follows:

- Agreement of the MOU for the LAHF Round 3 programme
- The identification of suitable properties in the key areas where need exists.
- Submission of business cases for Executive Member approval under delegation from the Leader (mirroring the approval route for individual purchases under the LAHF R2 programme)
- Submission of offers to purchase.
- Submission for statutory approvals, Planning, Building Regulations, etc. for the conversion element of the programme.
- Procurement and delivery of the conversion works and accommodation.
- Matching and allocation of properties delivered in 2024-25 and 25-26.

Expected Benefits to the Partnership

The report recommendations are anticipated to deliver the following benefits.

- To meet short, medium and long-term housing needs within East Lindsey district, through the provision of council-owned accommodation
- The delivery of homes that will address both an immediate term need for temporary and re-settlement accommodation and a longer-term need for affordable homes in East Lindsey.
- An increase in the provision of temporary accommodation housing in the district.

- Create a positive financial contribution to the Council over the short, medium and long-term, through both the generation of revenue streams (through rental income) and to effect savings through a reduction in the use of more costly bed and breakfast and similar accommodation.

Implications

South and East Lincolnshire Council's Partnership.

The report recommendations support the delivery of the Partnership's Sub-Regional Strategy in respect of improving housing standards, delivering affordable housing based on housing needs and reduce homelessness and rough sleeping.

Corporate Priorities

Included in the Partnership's Sub-Regional Strategy are the aims to improve housing standards, deliver affordable housing based on housing needs and reduce homelessness and rough sleeping. The delivery of these homes will contribute towards addressing these issues and is consistent with these aims.

The project also aligns with the SELCP Annual Delivery Plan, which includes the acquisition of homes to meet housing need.

Staffing

Staffing resources to secure the acquisition of the properties are being provided by officers at ELDC, working with housing and communities staff from across the SELCP. A cost for staff time is recharged against the project. The costs for these services are included within the project management fees shown in Appendix 1 and are a capitalised cost. The methodology for ELDC reflects the same methodology used by South Holland and applies to the capitalisation of staffing costs within its own development programme.

There will be the need to procure the services of external consultants experienced in the delivery of small-scale housing conversion works to provide design and cost consultancy services. The appointment of a suitable building contractor will also be required to carry out conversion and upgrading work. These appointments will be made through an appropriate procurement framework or competitive tender exercise.

Workforce Capacity Implications

None – the management of the programme can be delivered through existing shared resources across the Partnership, supported through the capitalised staff budget included within the project finances.

As part of the project an external consultant has been procured to carry out a review of the current and future management resource options to identify and implement a robust management strategy for these homes and those previously acquired and held as general needs housing stock. Work has commenced on this and is expected to complete by mid-October.

It is acknowledged that as the housing stock portfolio increases there will be a need to adopt a structured and adequately resourced approach to the management and maintenance of the homes. Work is in progress on a review of the current arrangements and development of an appropriate management strategy for implementation.

Constitutional and Legal Implications

ELDC has already made the decision to invest £1m to increase the provision of Council owned temporary accommodation. This report sets out details of the proposal to deliver this commitment coupled with the recent award of further LAHF grant towards TA and resettlement homes. The decision relating to the acquisition of individual properties and spend of the funds will be performed through an Executive Member decision, under delegated authority from the Leader of the Council. This mirrors the decision-making route for individual acquisitions under the LAHF Round 2 programme.

Future decisions in respect of the acquisition of these individual properties will be treated as an exempt decision under the grounds of commercial confidentiality. This reflects common practice across the SELCP in respect of property acquisitions that are subject to contractual negotiation and finalisation.

An external legal representative will be appointed to oversee the contract for the acquisition of these homes and will provide a Report on Title to ensure the homes benefit from a clean and marketable title. The legal costs associated with this are taken account of in the business case.

Officers will undertake thorough due diligence before acquiring the homes. The Executive Board has on previous occasions delegated authority to the Assistant Director Strategic Growth and Development to review the due diligence, valuation and contract terms, and to sign the contract and transfer documents. This will also be a requirement for these properties. This may include approving minor variations to the scheme approved in this business case, in consultation with the Portfolio Holder for Communities and Better Ageing.

The Council has a legal duty to provide suitable temporary accommodation of which B&B is often considered to be unsuitable leaving the Council open to a legal challenge. The provision of additional temporary accommodation will reduce the risk of challenge. On occasions the Council has had to provide B&B type accommodation out of the district because of limited option within East Lindsey. Legislation also requires the Council to make every effort to provide accommodation within its district.

Data Protection

None

Financial

Costs associated with delivering the programme will be funded from the Council's capital budget agreed at the October 2023 meeting of the full Council and, if approved the LAHF grant.

Appendix A provides a detailed financial evaluation of this programme. In advance of agreeing a management strategy, the financial evaluation includes assumptions on management costs, void costs, bad debt, repairs, maintenance and insurance. The return shown is Net of these operating costs. The assumptions on management costs, void costs and bad debt are based on a percent of the rental income due. The assumptions around repairs, maintenance and insurance are based on an annual cost and are as those used elsewhere within the SELCP for housing investment projects.

A deposit payment of 10% of the purchase price will be due on exchange of contracts. This deposit will be retained by solicitors until completion.

A RICS Valuation will be sought to corroborate the agreed purchase price for both new build and second-hand homes acquired. The valuation findings will be included within the

due diligence information to be reviewed and approved by the Assistant Director of Strategic Growth & Development.

The acquisition of the homes will utilise the forecasted budget of £1.000m agreed by Council and £1,067 awarded through the LAHF programme, taking the total project budget to £2.067m

Risk Management

Acquisition and development activity have inherent risks. A risk register will be compiled and reviewed throughout the lifecycle of the project by the project team and risks mitigated where possible. Officers will seek to ensure that the property acquisitions and conversion works are executed in the best interests of the authority.

As set out in 2.17 a longer-term management strategy is required and currently being prepared. The financial evaluation provided at Appendix A includes indicative management cost assumptions based on information from South Holland District Council (SHDC) adjusted to reflect higher management costs often associated with temporary accommodation. These cost assumptions are considered robust in terms of the management and repairs and are based on services delivered through South Holland's well established housing investment portfolio.

Stakeholder/Consultation/Timescales

The timescales for delivery of the LAHF funded programme are set out in the MOU at Appendix A. It is anticipated that both the TA and Resettlement homes will be completed by the funding deadline of April 2026. Every effort will be made to deliver before this deadline in order to enable need to be addressed as soon as possible.

Reputation

Risks around reputation will be mitigated through a robust project management structure. The Delivery Team will work closely with colleagues in Communications to ensure that an appropriate communications plan is in place to address any potential PR concerns. Provision of suitable accommodation will enhance the Councils reputation compared to using B&Bs which are considered by the Government to be unsuitable.

Contracts

In signing the MOU with DULHC, the Council will undertake to deliver the programme for eleven homes and meet the funding conditions including those relating to programme monitoring, due diligence, etc. Officers will monitor the project for compliance during the delivery of the programme.

The conversion of these units will include alteration and upgrading works requiring the appointment of a project team to design and deliver the project and obtain the necessary approvals for Planning and Building Regulations. Once appointed the contractor will be appointed under an appropriate building contract.

Purchase contracts will be dealt with by appointed external solicitors to act on behalf of the Council.

The tenancy agreement which will be offered to the residents is a 'Non-Secure-Tenancy and they would receive the same level of service as a secure tenant however Non-secure tenants only have basic protection under the Protection from Eviction Act 1977 therefore the Council would not require a court order should an eviction be required. The right to buy, right to exchange, right to succession, the right to take in lodgers and the right to sublet do not apply to non-secure tenancies. This means that the occupants have the right to live safely in their home and the landlord must fulfil all landlord obligations relating to compliance.

Crime and Disorder

Some homeless people have criminal convictions which can be better managed in self-contained accommodation and reduces the risk to other persons such as in shared accommodation including B&B's.

Equality and Diversity / Human Rights / Safeguarding

Having a range of accommodation dispersed across the district will assist the Council to be compliant with the Equality Act as well as safeguarding people through the provision of accommodation which meets their needs.

Health and Wellbeing

The delivery of these properties will contribute towards improving health and wellbeing in the district by the provision of temporary accommodation to address an identified housing need.

Climate Change and Environmental Implications

These homes will be converted in accordance with the appropriate building regulations relating to sustainable construction. This will include upgrading work to achieve thermal, fire and sound performance standards for existing dwellings required under the regulations. At handover, each property will have an energy performance certificate illustrating the energy efficiency of the property and the efficiency rating.

Links to 12 Missions

MISSIONS	
This paper contributes to the following Missions outlined in the Government's Levelling Up White paper.	
Housing	By 2030, renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

ACRONYMS

DLUHC	Department of Levelling Up Housing and Communities.
LAHF	Local Authority Housing Fund.
TA	Temporary Accommodation.
B&B	Bed and Breakfast

APPENDICES

Appendices are listed below and attached to the back of the report: -

APPENDIX A – EXEMPT PAPER	Cost Assumptions and Financial Evaluation
APPENDIX B	Capital and Revenue Summary

BACKGROUND PAPERS

Background papers used in the production of this report are listed below: -

Document title	Where the document can be viewed
Executive Board Report	Agenda for Executive Board meeting on September 20 th 2023 (Public Pack)Agenda Document for Executive Board, 20/09/2023 18:00 (e-lindsey.gov.uk)
Report to Full Council	Agenda for Full Council meeting on October 11 th 2023 (Public Pack)Agenda Document for Council, 11/10/2023 18:30 (e-lindsey.gov.uk)

CHRONOLOGICAL HISTORY OF THIS REPORT

A report on this item has not been previously considered by a Council body.

REPORT APPROVAL

Report author:	Helen Forman, Housing Strategy and Enabling Officer and Andrew Sweeney, Housing Development Manager.
Signed off by:	Matthew Hogan, Assistant Director Strategic Growth & Development Tel: 07776 240766 Email: matthew.hogan@sholland.gov.uk
Approved for publication:	Councillor William Gray, Portfolio Holder for Communities and Better Ageing