Brent	Cabinet 24 August 2015 **Report from Strategic Director Regeneration and Growth**

Affordable Housing Supply Programme – Right to Buy Receipts 2015 - 2019

1.0 Summary:

This report sets out proposals for Cabinet consideration to establish and deliver a Right to Buy (RTB) receipt enabled new supply housing programme for 2015-19.

1.1 The Borough is facing well recognised housing pressures. It is likely that these will be exacerbated as a consequence of recent announcements in the 2015 budget. The Borough's adopted Housing Strategy proposes a clear approach for seeking to address these pressures. Increasing the supply of new housing is fundamental to this.

1.2 The Borough has seen an increase in RTB applications since the government increased the discount available. To date 187 properties (142 flats and 44 houses) have been sold from 1 April 2011 to 31 March 2015. This has now generated a critical mass of receipts and the focus now needs to be on spending this money to accelerate the delivery of replacement affordable homes in line with the priorities set out in the Housing Strategy.

1.3 The recommended actions set out in this report aim to commit the existing and future RTB receipt pool in a cost-effective and efficient way to ensure both value for money and the timely delivery of replacement affordable homes. The approach will ensure that all RTB receipts are utilised before the quarterly milestone date, so as to prevent any loss of this funding to the borough under the requirements of the section 11(6) (Local Government Act 2003) Retention Agreement.

2.0 Recommendations:

Cabinet Agree:

2.1 The continuing retention of Right to Buy receipts (subject to government legislation), as part of the Brent Retention Agreement (2012) with the

Secretary of State for Communities and Local Government, until 31 March 2019.

2.2 From 1 September 2015 to 31 September 2016 the purchase of open market properties in accordance with criteria to be agreed by the Chief Finance Officer, for the provision of affordable housing, expending a minimum of £2.01m of RTB receipts (30%) and £4.69m of HRA (70%) capital resources, and to delegate authority to the Operational Director for Property and Projects to agree the final terms of these acquisitions.

2.3 To commence procurement of a Preferred Delivery Partner, either via the Greater London Authority London Development Panel 'Mini Competition' process or through the Official Journal of the European Union, to provide new affordable housing with the support of Right to Buy receipts in 2016-19 and to thereafter seek Cabinet approval to award this contract.

2.4 That a minimum of £11.64m RTB receipts be committed to the Delivery Partnership set out in recommendation 2.3 and that the balance be available to support investment in the two Housing Zones subject to further Cabinet approval.

3.0 Details

Right to Buy Policy and Brent's Retention Agreement

3.1 The Government's revised policy on Right to Buy (RTB) discount is intended to stimulate sales and generate additional receipts to fund replacement stock on a one-for-one basis. In order to keep the receipts from additional sales, local authorities were able to enter into a Retention Agreement with the Secretary of State for Communities and Local Government on condition that they are used for the provision of affordable housing. Brent entered into a Retention Agreement in 2012 (Executive decision of July 2012).

3.2 National guidance sets out a number of criteria for the deployment of retained RTB receipts. In summary, these criteria require that:

- RTB receipts must be committed, as per the Brent Retention Agreement requirements and criteria before the deadline (3 years)
- Capital receipts must be used to create rental (revenue) income
- Receipts must provide Social Housing (low cost rental accommodation as defined by section 68 (1) (a) of the Housing and Regeneration Act 2008).
- The 30% Benchmark must be applied as set out in para 3.3 below

3.3 The main restriction is that the Right to Buy receipts can be used to fund no more than 30% of development cost within 3 years from the Quarter received, otherwise the Council would need to return, with interest, any receipts that breach this 30%. This is known as the 30% Benchmark.

3.4 Brent entered into its Retention Agreement on 20th July 2012. The 'pool' of receipts has now reached a sufficient level where deployment can commence, with £13.65m available as at end of 2014/15 Financial Year to support the provision of new affordable homes by 31st March 2018.

Given the projected level of future RTB sales and the legislative changes in March 2015 to the RTB discount rates, it is also timely that a more long-term and partnership approach to deploy the RTB receipt pool from 2015-16 financial year be agreed.

3.5 RTB Receipt Pool at April 2015

The table below summarises the position for retained receipts, required contributions, cumulative spend and required utilisation dates for the period to the end of the 2014/15 financial year.

Period	Amount Retained £m	Cumulative Retained RTB Receipts £m	Required 70% Contribution £m	Cumulative amount of Investment £m	To be utilised by:
2014/15 Qtr 4	1.58	13.65	3.68	45.49	31.03.18
2014/15 Qtr 3	1.87	12.07	4.36	40.23	31.12.17
2014/15 Qtr 2	1.48	10.20	3.46	34.00	30.09.17
2014/15 Qtr 1	2.22	8.72	5.19	29.06	30.06.17
2013/14 Qtr 4	2.34	6.50	5.45	21.65	31.03.17
2013/14 Qtr 3	2.15	4.16	5.00	13.86	31.12.16
2013/14 Qtr 2	1.34	2.01	3.12	6.70	30.09.16
2013/14 Qtr 1	0.17	0.67	0.40	2.24	30.06.16
2012/13 Qtr 4	0.50		1.17	1.67	31.03.16

3.6 RTB Receipt Deployment Options

Guidance from the CLG states that there are two ways a council can spend the receipts for the provision of affordable housing:

- Use the receipt itself, as a direct provider, whereby the council finds the remaining 70% of the cost of provision; and/or

- Transfer the receipt to another provider, with another provider contributing the remaining 70% funding towards the provision

There are a range of ways the above approach can be delivered and some of the options are summarised below:

3.7 Option A - Self-Funded Model (New Development / Purchase)

The council could use the RTB receipt pool to build and/or purchase new affordable homes itself. Right to Buy receipts can only be used to fund 30% of the affordable housing costs. If the council were to build or acquire affordable homes itself, it would need to find 70% of the remaining cost from the Housing Revenue Account (HRA).

The HRA must work within Government borrowing restrictions which imposed a debt cap of just under £199.29m. If all the RTB receipts to date were deployed through a self-funded model, HRA borrowing of £31.84m would be required to meet the remaining 70% capital cost contribution to 31st March

2018. The borrowing headroom at 31 March 2014/15 stood at £58.81m and in addition capacity needs to be reserved to fund the stock investment programme and the new-build development programme which has been awarded GLA grant funding.

The government has also recently announced that rents are to be reduced from 2016 by 1% per annum for four years and this will limit the resources available within the HRA.

3.8 Option B – Seed-Funded Investment Leverage Model

The council could use the RTB receipt pool as ‘seed funding’, working in partnership with a Preferred Delivery Partner. The benefit of this approach is that for every £3 of RTB receipt, the Preferred Housing Partner would contribute a minimum of a further £7 from their financial resources, called investment leverage.

The procurement of this Preferred Delivery Partner would include evaluation of the maximum degree of leverage and affordable homes thereby provided. The homes may be delivered through new development or acquisition. The council would enter into a Nominations Agreement to ensure access to this affordable housing in perpetuity.

Using RTB receipts to fund a Registered Provider-led programme would provide new affordable housing without the need for the council to fund the other 70% of the capital cost contribution and would leave HRA borrowing capacity available for stock investment and grant-funded new development more generally, whilst increasing the supply of new affordable housing.

This approach could also provide for the council’s RTB receipt contribution to be treated as an effective equity stake if the property was sold, and this will be explored through the procurement of the Preferred Delivery Partner. The value realised could potentially be higher than the initial investment if the property sold had increased in value over time. This is a long-term option with returns on investment being realised maybe 20-30 years in the future with the potential of the receipt on disposal being ‘recycled’ to support the provision of new affordable housing. There would be a potential loss of the affordable housing upon sale of the properties.

3.9 Option C. Hybrid Model (Mixed)

A Hybrid Model could be used to deploy RTB receipts in specific housing intervention areas of the Borough, such as in the Housing Zones. The council could use its RTB receipts in a number of ways – to purchase land, property, invest in stock or act as ‘seed-fund’ provider to enable new or additional affordable housing as part of the acceleration and housing growth proposals.

3.10 Option D. Receipt Return Model

The council could decide not to spend the RTB receipts. This would result in having to pay the money back to the Government with an interest payment of 4% above base rate (calculated from the date of receipt on a day to day basis compounded with three-monthly resets) and no new and/or additional affordable housing would be provided for Brent through this route.

3.11 Recommended Brent Approach

It is clear that there are a range of models that can be used to support the use and deployment of RTB receipts. However, it is important that these models maximise and accelerate affordable housing delivery and mitigate cost, risk and provide value for money for Brent.

The recommended approach also takes account of the impact of national housing policy emerging from the Summer Budget 2015 on the HRA, supports strategic housing priorities within intervention areas and the delivery timescales to meet government RTB guidance.

The rationale for each recommendation is set out in more detail, as below:

3.12 Recommendation 1: Continuation of the RTB Receipt Retention Agreement (until 31 March 2019)

There is a large and urgent need for good quality, affordable accommodation in the borough. It is recommended that Brent continues to retain its RTB receipts until 31 March 2019 for the provision of new and additional affordable housing.

The recent extension to the national Right to Buy arrangements provides for a continuation of the RTB policy, with financial changes, as set out at 4.1 in this report. These are likely to further increase take-up of RTB and the receipts being received over the longer-term. The continuation of the RTB Receipt Retention Agreement would enable the council to retain the eligible proportion of RTB receipts for the provision of affordable housing.

3.13 Recommendation 2: Adoption of a Self-funded RTB Model from 1 September 2015 for 12 months to deliver approximately 35 new homes for affordable rent

In relative terms, the RTB receipt pool in the next 12 months is small, with only £2.01m required to be invested for new affordable housing provision. It is important that Brent commits its first RTB receipts in a timely way to avoid any interest or 'claw-back' from the government.

It is therefore recommended that £6.7m be invested to purchase approximately 35 open market properties for the provision of affordable housing by 30 September 2016. These homes are anticipated to be a number of 1, 2 and 3 bedroom homes for affordable rent in or near to Brent.

This approach will enable the RTB receipts to be deployed to deliver an early phase of new affordable housing supply, whilst a long-term partnership arrangement is procured, as set out at 3.14.

The properties would be managed by Brent Housing Partnership, as per the existing Management Agreement.

Approximately £4.69m of HRA capital resources will be used to support this direct purchase programme alongside £2.01m of RTB receipts.

The current approved HRA capital programme makes provision for £1.17m of borrowing to be deployed for the purchase of properties on 2015/16. The required balance of 3.52m will have to be included in the setting of the 2016/17 capital programme and allowance made in the HRA Business Plan and available headroom.

3.14 Recommendation 3: Procurement of a Preferred Delivery Partner to deliver approximately 200 new Homes for Affordable Rent

The HRA cannot sustain a fully, self-funded model of RTB receipts spend to provide new affordable housing.

Additionally, the Summer Budget announcement (2015) set out a number of national policy changes which are anticipated to directly impact upon the HRA business plan from 2016-17 including:

- A 1% decrease in rents per annum for four years from April 2016.
- A potential requirement to sell high value properties above the London Threshold Level.
- A number of Welfare Reforms that will impact on housing benefit entitlements and tenants' incomes and may affect rent collection levels
- Increased Right to Buy discounts.

There is also a need to balance the requirement to provide new affordable homes with stock investment requirements as set out in the Asset Management Strategy agreed in November 2013.

It is therefore proposed to appoint a Preferred Delivery Partner, as described in Option B above. This partner will be procured via the London Developer Panel (LDP) 'mini competition' process if initial invitation of expressions of interest indicate that there will be a sufficiently competitive environment or, alternately, through an open EU-complaint procurement.

The LDP, which was established by the GLA, is intended to be used for the procurement and development of housing-led sites and development services. The Panel has been procured for 4 years (from 10 May 2013) and comprises Registered Partners and Developers approved as per the Official Journal of European Union (OJEU) procurement process.

It is envisaged that this partnership could deliver approximately 200 new homes for affordable rent, with £11.64m of RTB receipts and private investment leverage of at least £27.16m. This proposed Partnership Delivery programme is of an estimated value of £38.8m (at July 2015). These homes are anticipated to be a number of 1, 2, 3 and 4 bedroom homes for affordable rent. As part of the procurement of this Partnership, commercial options will be sought for the delivery and location of the new homes and reported to Cabinet for consideration in summer 2016.

This approach would reduce the impact on the HRA and see investment leverage of at least 70% of the capital cost being met through private investment, without additional financial recourse to the council's HRA. The council would agree a Nominations Agreement in perpetuity to secure access to this new affordable housing. The variant of the council taking an effective 'equity' stake in the properties will also be explored through this procurement.

Procurement Considerations

OJEU allows for two bases of award: lowest price or most economically advantageous tender (MEAT) from the point of view of the contracting authority.

It is envisaged that the MEAT criteria for this procurement would therefore consider, in summary:

- Price and value for money benchmarked against commercial price information including the degree of investment leverage offered.
- Operational costs which are benchmarked and are in the lower threshold for delivery programmes of this nature
- Excellent housing management services performance and neighbourhood working
- Technical expertise of the team and/or organisation to deliver such a programme. Ability to demonstrate sufficient resourcing, knowledge, scale and pace, previous delivery record and technical merit
- Corporate strategic alignment to support the borough's housing strategy priorities and objectives
- Demonstrate and bring commercial innovation in approach, particularly focused on the ability to maximise affordable housing provision
- Commitment to the Social Value Act 2012 and enabling through corporate, social responsibility approaches community benefit and contract 'additionality', such as demonstrating a clear commitment to jobs, training, skills and local construction supply chains.
- It is anticipated that the lead Preferred Delivery Partner (Developer and/or Housing Association) will hold and continue to retain Investment Status with the GLA, with a sound track-record of 'Green light' GLA compliance audits for governance, finance and development services.

The Invitation to Tender (ITT) will be evaluated upon 50% quality and 50% price. It is proposed that the contract will be awarded to a lead Development / Housing Association partner (this maybe a consortium arrangement) based on the quality, value for money and technical experience demonstrated in the tender.

The tender pack will comprise:

- service and delivery specification
- financial information about the RTB receipt pool and deployment timetable
- RTB guidance and national information
- contract terms and conditions
- contract award criteria
- complaints procedure
- nominations for new homes procedure
- monitoring requirements
- background information about the London Borough of Brent

- method statement

Pre-Tender Considerations:

In accordance with Contract Standing Orders 88 and 89, pre-tender considerations have been set out below. The considerations set out apply whether procurement is through the LDP or through an open OJEU procurement and are set out in the standard form for the latter approach with a corresponding timetable.

Ref	Requirement	Response
(i)	The nature of the service	The provision of full development management services including: • Preparing development delivery plans • property / land / asset identification and/or acquisition • feasibility modelling / testing • Grant, 'seed' or investment funding • Design team • Pre-construction works and planning and/or technical applications • Negotiation of s.106 Agreements • Technical support services and/or consultants • Project/ Programme and gateway contract management • Construction management including CDMC requirements • Supply chain and contractor / sub-contractor management • Corporate, social responsibility as per Social Value Act 2012 • Housing management services (as required) , including administration of the Nominations Agreement • Programme resourcing • Handover and defects liability periods (where applicable)
(ii)	Estimated value	To be determined through the procurement. Estimated to be in the region of £38.8m based on the delivery of 200 new affordable homes including £11.64m RTB receipts
(iii)	The contract term	4 years, with the possibility of one 1-year extension to be granted, subject to review of performance (up to a total maximum contract term of 5 years) and RTB receipt government guidance.
(iv)	The tender procedure to be adopted	Formal tender by way of Restricted procedure (two-stage process) in accordance

		with the Public Contract Regulations 2006 and the Council's Contract Standing Order 95 Being a Part A service and likely to be of interest to the wider market the service will be advertised through the Official Journal of the European Union (OJEU) and on the Councils web site.
(v)	The procurement timetable – the dates shown are target dates	• Cabinet decision – August 2015 • Adverts placed & PQQ issued – November 2015 • PQQ returned – January 2016 • PQQ evaluation - February 2016 • Shortlist - February 2016 • Invite tenders - March 2016 • Tender return – May 2016 • Tender evaluation - June 2016 • Cabinet approval - Aug 2016 • Alcatel period - 10 days • Contract award – September 2016 • Contract start – 30 September 2016
(vi)	The evaluation criteria and process	The tenders received will be evaluated on quality and price. Quality will represent 50% of the marks and will be evaluated against the following criteria: • A demonstrated ability to provide a full housing development and management service. • Demonstration of value for money in the delivery of high quality services • A demonstrated ability to identify and respond to changing priorities with due regard to the diversity and varying needs of the community • A demonstrated commitment to the operation of a quality assurance policy in all aspects of service delivery • A demonstrated ability to collect, maintain, analyse and provide statistical and other information • A demonstrated ability to deal with tenancy and management issues taking into consideration our Equality & Diversity Policy Price will represent 50% of the marks and will be evaluated on the basis of the value-for-money represented by the proposals

		including the additional investment leverage that will be generated to match the contribution of the RTB receipts. Shortlists are to be drawn up in accordance with the Council's Contract Procurement and Management Guidelines namely the Pre Qualification Questionnaire and thereby meeting the Council's minimum requirements in relation to financial standing requirements, technical capacity, technical expertise and compliance with statutory requirements such as health and safety. Candidates who meet the Council's minimum requirements will be shortlisted and invited to tender, and such tenders will subsequently be evaluated in accordance with the criteria above. Financial and legal considerations on tenders returned are to be given by the Housing Finance Team and representatives from the Council's Legal and Financial services respectively. Where required, these representatives will participate in the evaluation panel.
(vii)	Any business risks associated with entering the contract	The scheme is funded (30% Benchmark) from the RTB receipts pool via the RTB Retention Agreement.
	The Council's Best Value duties.	The advertising of the contract on the OJEU will attract competition from the wider market. Contract monitoring and management will ensure the Council's Best Value obligations are met.
(ix)	Any staffing implications, including TUPE and pensions	None identified.
(x)	The relevant financial, legal and other considerations	As noted in this report (paras. 4.0 and 5.0)

3.15 Retention of a Proportion of RTB Receipts 2016-19 to Support the Housing Zones

It is proposed that a proportion of remaining available RTB receipts are reserved for use in the housing zones or other housing growth areas. This is to enable additional affordable housing provision in these areas and also to continue to support the acceleration and growth of housing supply in these local housing markets. Details of the proportion of RTB receipts recommended to be deployed to support this priority will be reported to Cabinet when further assessment of investment opportunities in the Housing Zones has been undertaken. Such investment would be distinct from and additional to affordable housing secured in the Housing Zones through s.106 agreements or through GLA Housing Zone grant funding.

These RTB receipts would be deployed through bespoke arrangements (based around the Option E Hybrid RTB Receipt Model). Further details will be presented to Cabinet for consideration and approval when the procurement of the Preferred Delivery Partner is reported to Cabinet in summer 2016.

4.0 Financial Implications

4.1 From 26 March 2015, the following RTB discount levels will apply from the same date:

- 3 years – 35% discount for a house and 50% discount for a flat
- 4 years – 35% discount for a house and 50% discount for a flat
- 5 years – 35% discount for a house and 50% discount for a flat
- 6 years plus – add 1% per year for houses (up to 70% or the cash maximum – whichever is lower), add 2% per year for flats (up to 70% or the cash maximum – whichever is lower)
- Uplift to the national maximum discount for RTB to £103,900 available to those who qualify under secure tenancy terms. Currently percentage discount levels (60% maximum for houses and 70% maximum for flats) are applied.

4.2 Under the Retention Agreement entered into on 20th July 2012, the ‘pool’ of retained RTB receipts has reached £13.65m, as at end of 2014/15 Financial Year, with receipts being available to support the provision of new affordable homes up to a required utilisation date of 31st March 2018. Taking into account the projected level of future RTB sales and the legislative changes in March 2015 to the RTB discount rates, this pool of retained receipts will continue to accumulate until such time that the Retention Agreement is terminated.

4.3 The retained RTB receipts can be used to fund no more than 30% of development cost within a period of 3 years, otherwise the Council is required to return, with interest at 4% above base rate, any receipts that breach these conditions. A match funding contribution of 70% of development costs is required which can be provided by the Council as a direct provider or by another provider to whom the 30% retained receipts are transferred.

4.4 The first tranche of retained RTB receipts totalling £500k derived from 2012/13 Quarter 4 must be spent by 31 March 2016 to avoid any interest or ‘claw-back’ from the government. This will require a match funding contribution of £1.17m which is currently provided for in the 2014/15 HRA Capital Programme budgets.

4.5 A further £1.51m of retained RTB receipts derived from 2013/14 Quarter 1 and 2 must be spent by 30th September 2016 which will require a total match funding contribution of £3.52.m. This match funding requirement will have to be included in the setting of the 2015/16 capital programme and allowance made in the HRA Business Plan and available headroom.

5.0 Legal Implications

5.1 Section 17 of the Housing Act 1985 allows Councils to acquire land for housing purposes and to dispose of land used for housing purposes to a person or organisation which intends to provide housing accommodation on the land or provide facilities which serve a beneficial purpose in connection with the requirements of persons for whom housing accommodation is provided. The general power of competence under section 1 of the Localism Act 2011 gives local authorities a broad range of powers "to do anything that individuals generally may do" subject to limits within other legislation and there are no adverse limits on the proposed scheme under the current legislation.

5.2 The Council has powers under section 24(1) of the Local Government Act 1988 to provide any person with financial assistance for the purposes of, or in connection with, the acquisition, construction, conversion, rehabilitation, improvement, maintenance or management (whether by that person or by another) of any property which is or is intended to be privately let as housing accommodation. Although this power is subject to consent from the Secretary of State for the purposes of section 25 of the Local Government Act 1988, in 2010 the Secretary issued a general consent under section 25 and that general consent allows, amongst other things, a local authority to provide any person with any financial assistance (other than the disposal of an interest in land or property) for the purposes of or in connection with the matters mentioned in section 24(1) of the 1988 Act;

5.3 Right to buy receipts must be applied in accordance with relevant legislation and guidance and particularly the Local Authorities (Capital Finance and Accounting)(England) Regulations 2003 (as amended) and the terms of any agreement reached under section 11(6) of the Local Government Act 2003 modifying the applicability of the regulations.

5.4 As part of the retention agreement, the GLA has agreed to:

i. allow the local authority to retain additional net Right to Buy receipts to fund the provision of replacement stock, limited to 30% of the cost of replacement homes.

ii. allow the local authority three years (from the commencement of the agreement) to invest those receipts before asking for the money to be returned.

5.5 In return, the Council has agreed with the GLA:

i. that Right to Buy receipts will not make up more than 30% of total spend on replacement stock, and
ii. to return any used receipts to the Secretary of State with interest.

5.6 It is worth emphasising that the retention agreement with the GLA does not require a local authority to complete the building of any home within three years. All that is required is that the local authority should have incurred expenditure sufficient that Right to Buy receipts form no more than 30% of it.

5.7 Under the Deregulation Act 2015, from 26 May 2015, tenants will only need a minimum of 3 years public sector tenancy to qualify for the Right to Buy. Other aspects of the eligibility criteria remain unchanged.

5.8 On 19 July 2012, the Executive gave the current Strategic Director of Regeneration and Growth delegated authority to make Right to Buy receipts available to Registered Providers of Social Housing under a competitive bidding process to deliver replacement low cost rented accommodation in accordance with the Council's Contract Standing Orders.

5.9 Acquiring or disposing of freehold land or buildings which in the view of the Operational Director Property and Projects are over £250,000 require the approval of the Cabinet.

5.10 Recommendation 2.3 indicates that in financial year 2016-19 the Strategic Director of Regeneration and Growth wishes to procure a preferred development partner using the Greater London Authority London Development Panel to deliver new affordable housing with the support of Right to Buy receipts in 2016-19. In accordance with Contract Standing Order 86(e)(ii), the Strategic Director of Regeneration and Growth may commence a call-off under the relevant framework provided that the Chief Legal Officer has advised that participation in the Framework Agreement is legally permissible. Given that the estimated value of the contract for a preferred developer partner is likely to be in excess of £500k and thus classified as a High Value Contract under the Council's Contract Standing Orders and Financial Regulations, Cabinet approval is required for the award of such contract.

6.0 Diversity Implications

An Equality Impact Assessment has been completed for the potential RTB programme. No specific equality groups have been identified and/ or are anticipated to be adversely effected by the proposals set out in this Report:

It in anticipate that all equality groups will benefit from the deployment of RTB receipts through:

- Providing more housing choice and improving access to affordable accommodation
- Provide better quality housing across the borough

An Equality Impact Assessment will be undertaken for each recommendation as set out at 3.8 – 3.11. and each individual proposal will consider equality and diversity implications as part of each recommended action, as set out in 2.0.

7.0 Background Papers:

- Brent Executive Report - Right to Buy: Reinvesting Receipts in New Affordable Rented Homes (July 2012)
- Housing Capital Receipts: Exemptions from Regulations: Guidance for Local Authorities (November 2012)

- CLG *Reinvigorating Right to Buy and 'One for One' Replacement*: Information for Local Authorities (March, 2012)

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