

Cabinet

8 December 2014

Building the homes we need to house the people of Lambeth

Wards: All

Joint Report Authorised by:

Strategic Director Commissioning: Helen Charlesworth May

Strategic Director Delivery: Sue Foster

Portfolio: Cabinet Member Housing: Cllr Matthew Bennett

Contact for enquiries:

Report summary

Our ambition is to ensure that every resident in Lambeth has the opportunity to live in a good quality home that is affordable and suitable for their needs. Recognising that good quality housing is a key priority for achieving our community outcomes, we intend to target our resources and use our influence to make sure residents have a range of housing options available to them.

This administration is committed to delivering 1,000 extra homes at Council rent levels, levering in more investment via new, radical methods to fund and deliver a new generation of homes for Lambeth's residents. These 1,000 new Council homes will be delivered over the next 4 years through a combination of estate regeneration, small sites development and specific housing projects.

This report sets out an ambitious programme of Council-led housing delivery that will provide more opportunities for better quality homes. The programme will improve the living conditions for existing residents and provide much needed, new, high quality housing which is affordable to our residents.

The intention is to maximise the provision of new homes at Council rent levels by using external capital and long-term investment models; retaining the homes within the Council's ownership and optimising the use of private sale to subsidise social housing.

Local people and local partners will be central to the programme's success. The Council will continue to embrace innovative delivery models that maximise the number of genuinely affordable homes and retain as much control as possible within the local community.

Finance summary

- Each phase and scheme will require detailed financial modelling of opportunities for funding and operations to make best use of available resources as well as the future cashflows.
- There will be costs associated with the setting up and operation of a Housing Regeneration Special Purpose Vehicle (or Vehicles) to enable the recycling of capital receipts for future re-investment in Housing within the borough. These will be identified as part of the delivery options analysis and will need to be funded from the Regeneration business model.

Recommendations

- (1) To note the Council's commitment to improve the housing offer for Lambeth residents by:
 - a. delivering 1,000 new homes at council rent levels over the next four years;
 - b. investing an historic £490m over 5 years to bring our housing stock up to the Lambeth Housing Standard;
 - c. maximising our assets to deliver new homes through an estate regeneration programme;
 - d. progressing innovative mixed schemes, such as the Somerleyton Road project; and
 - e. continuing to work with developers to secure a minimum of 40% affordable housing on regeneration schemes in the borough.
- (2) To agree to progress phase 1 and phase 2 of the estate regeneration programme as set out in paragraph 2.11.
- (3) To agree that further estates are identified based on the criteria, agreed at Cabinet in October 2012, to be included within the programme as set out in paragraph 2.11.
- (4) To note progress on the small sites programme as detailed in this report.
- (5) To note the detailed progress on establishing a Special Purpose Vehicle or Vehicles.
- (6) To note the draft regeneration Resident's Principles.
- (7) To authorise service of appropriate legal notices suspending the Right to Buy on the identified estates in 2.11

1. Context

- 1.1 The Council recognises the importance of good quality homes in Lambeth and the role that housing plays in not only improving the lives of those who live in it but also in making Lambeth a great place to live, work and visit. 'More opportunities for better quality homes' is a key outcome in Lambeth's Community plan 2013-16 and the vision set out in the Lambeth Housing Strategy 2012-16 is that all Lambeth residents 'live in a home they can afford, that is safe and well managed and in a neighbourhood they are proud to live in.' Most significantly the Council is now committed to providing 1,000 new homes at Council rent levels over the next 4 years.
- 1.2 In December 2010 Cabinet agreed to establish a Housing Commission to consider the key challenges and housing issues in the borough. This resulted in the production of 'The Co-operative Council: The Future of Council Housing' report, which set out 31 recommendations to improve housing in Lambeth. As a direct result of the Housing Commission report, Cabinet approved the coproduced Lambeth Housing Standard (LHS) in March 2012 and committed to invest £490m in bringing our housing stock up to the LHS standard. Whilst this is unprecedented investment in the borough's housing stock, the March 2012 Cabinet report identified an estimated £56m funding shortfall in delivering the Standard.
- 1.3 The Housing Commission also recommended the development of an estate regeneration programme and a report was presented to Cabinet in October 2012 recommending the development of programme which would focus on improving the quality of housing on estates and providing opportunities for new, additional homes.
 - 1.4 The expectation is that a significant proportion of the 1,000 new homes at Council rent levels will come from the small sites programme, other innovative housing projects and estate regeneration. Approximately 500 new affordable homes (not all at Council rent) are in the process of being delivered. Some of these are already funded through Right to Buy receipts and the Council's own capital pot investment; others have funding strategies in place however no draw down has taken place (i.e. Somerleyton Road); and some are still at the feasibility stage.
- Significant progress has been made already. A mixed use scheme of approximately 300 new homes is planned for Somerleyton Road with a planning application due in June 2015 the preferred delivery model is for the development to be 100% rented; maximising the amount of genuinely affordable housing that can be delivered on the site. The Council has also negotiated with developers the provision of 70 homes at Council rent levels on Lollard Street and construction is underway on a further 8 homes at Council rent levels on St Oswalds. Further, the LHS Programme is in its third year and the programme has made significant improvements to properties across the borough, with almost 4,000 new kitchens and bathrooms being upgraded so far.
- 1.6 To achieve the outcomes agreed in the Lambeth Community Plan 2013-16 the Council is ambitious about improving the living conditions for existing residents as well as providing much needed new, high quality housing which is genuinely affordable. As we do not have enough free, undeveloped land in Lambeth to build the new homes we need we intend to do this by embarking on the biggest estate regeneration programme in the

borough's history. The combination of estate regeneration with our LHS programme will raise the standard of Council housing, building homes which are of a high architectural standard and build quality.

- 1.7 Since the Right to Buy policy was implemented in 1980, Lambeth has lost 11,579 council homes. Whilst the size of the Council housing stock has reduced the population of Lambeth has grown to over 300,000 with forecasts from the GLA of another 100,000 residents by 2050. There are more than 20,000 people on Lambeth's housing waiting list and over 1600 families are in temporary accommodation, unable to secure a permanent home in the borough. Every week more than 20 homeless households are added to the list of people needing affordable housing in the borough.
 - 1.8 Over the coming years the number of homes lost through the Right to Buy is forecast to increase significantly. In 2013-14 fewer than 100 homes were bought by tenants, in 2014-15 this number is expected to pass 250. Over the next four years the Council is committed to deliver an additional 1000 homes for Council rent, but even with this ambitious pledge, we could still see either no increase in the number of homes at Council rent levels or a net loss. Local authorities across London are pledging to deliver more homes. Southwark has announced a target of 1,500 new homes at Council rent by 2018; Lewisham is committed to delivering 250 new homes over the next 5 years; and Ealing Council is committed to delivering 500 new homes over the same period.
- 1.9 Given the growing scale of the housing crisis, realistically we need to go beyond our pledge to deliver 1000 extra homes for Council rent and ensure there are homes to meet the broad spectrum of housing needs in the borough. We also need to work with developers and housing associations to provide more intermediate homes for residents squeezed between a private rented sector that is increasingly unaffordable and social housing for which they will never be eligible. We need homes for the 1600 families in temporary accommodation, homes for young families and young professionals renting in the private rented sector who can't afford to buy and whose home is insecure but who want to stay in the borough.
- 1.10 Our housing strategy will seek to deliver homes for Council rent, homes for subsidised rent, homes for private rent and affordable home ownership. Our role as a local authority is to fill the gaps that the private market cannot.
- 1.11 But this will mean an entirely new model of housing finance and delivery. Moving into a space that councils haven't previously occupied and engaging with the private sector in a way that hasn't been done before.

Policy Background and Delivery Options

- 1.12 There are 3 main options for a local authority to deliver new homes:
 - i) Housing Revenue Account (HRA) delivery

Every council has an HRA to account for spending and income relating to the management and maintenance of council-owned housing stock. The government reformed the system of council housing finance under the Localism Act 2011 and introduced 'self-financing'. This allowed councils to keep their rental income to

fund their housing stock and imposed caps on the overall levels of borrowing councils can undertake. The HRA is kept separate from the council's other accounts and any land and assets, such as new homes, would remain in the HRA. Any investment (capital expenditure and resulting income) is accounted for in the HRA and therefore any additional funding would lead to an increase in the HRA capital financing requirement.

ii) General Fund delivery

The council also has a General Fund account to cover the majority of day-to-day spending, income and expenditure. Any capital investment and resulting income from new housing would be accounted for in the General Fund. The financing requirement would not impact the HRA capital financing requirement. However, if the Council uses its own housing land – this must be appropriated from the HRA to the General Fund and the General Fund would have to compensate the HRA for the land/assets.

iii) Special Purpose Vehicle (SPV)

An SPV or a series of SPVs could be set up as a separate legal company (or companies) with the council as sole shareholder. This is an ideal way to isolate financial risk for a specific project and any capital investment and revenue income is accounted for by the company. The land and any assets would be acquired by the wholly owned company or SPV from the Council. There are options for financing the company (i.e. Public Works Loan Board, institutional investors) which would be unlikely to impact the HRA capital financing requirement.

- 1.13 As HRA borrowing is capped at a maximum level, borrowing 'headroom' is deemed to be the difference between the actual level of debt and the government imposed maximum cap. There is headroom within the Council's HRA business plan however there are lots of calls already on its expenditure including maintenance of existing homes, delivery of new homes and pump priming estate regeneration projects. The short term picture indicates that there is insufficient headroom to deliver the 1,000 new homes purely by using the HRA borrowing and therefore alternative funding options need to be explored. There are a number of funding models which could be used for housing delivery and each of these has implications as to the delivery model used.
- 1.14 The base position for Council led housing delivery is that capital investment in HRA assets is accounted for within the HRA, and any financing requirements lead to an increase in the HRA capital finance requirement. Although we have lobbied government for borrowing caps imposed on councils to be reformed, we are constrained in our ability to increase our HRA capital financing requirement as each Council is restricted as to how much debt it can take on.
- 1.15 As a result, many Councils are looking at different delivery models which can lever in external investment to drive forward the delivery of much needed housing and positive change, including setting up wholly owned Special Purpose Vehicles (SPVs).

- 1.16 There is no single solution that is right for all projects and the decision for which delivery route will need to be assessed against the following criteria: deliverability, financial impact, contribution to other Council outcomes and risks to the Council.
- 1.17 The short, medium and long term priorities for the programme are closely aligned with the Council's priorities also contained within the Community Plan 2013-16.

	Outcome	Short term priority	Long term priority
1.	More jobs and sustainable growth People achieve financial security Lambeth plays a strong role in the local community People have the skills to find work People live in, work in and visit our vibrant and creative town centres	 Enable residents to remain in the borough and benefit from its growth Provide opportunities for new jobs 	 Increase the supply of housing which is affordable to our citizens Reduce fuel poverty
2.	Communities feel safer and stronger People are healthier, for longer Crime reduces Older, disabled and vulnerable people can live independently and have control over their lives All Lambeth communities feel they are valued and are part of their neighbourhoods Lambeth residents have more opportunities for better quality homes All young people have opportunities to achieve their ambitions	 Greater local control through housing cooperatives and local lettings policies Targeted training and employment programmes 	 Create safer neighbourhoods through good design, active spaces and strong communities Provision of new specialist housing such as extra care
3.	Cleaner streets and greener neighbourhoods People lead environmentally sustainable lives People take greater responsibility for their neighbourhood	Invest in challenging neighbourhoods, raising their profile and making them attractive places to live, work and visit.	High quality homes which are more energy efficient and cheaper to run

2. Proposal and Reasons

Progress with the Special Purpose Vehicle and the Financing Options

- 2.1 A Special Purpose Vehicle is being considered as part of the Somerleyton Road project and this has provided a good methodology for exploring the most suitable regeneration vehicle for delivering new housing. Much of the learning from the Somerleyton Road project will be transferred to this workstream.
- 2.2 The Council will undertake a full options analysis on Special Purpose Vehicles to ascertain which approach is a best fit for the outcomes we want to achieve as a local authority. The table below sets out some relevant examples as to how other local authorities are approaching the problem:

London Borough	Description	
Ealing	Established Broadway Living, a wholly owned SPV, which delivers intermediate and private rent homes on behalf of the Council.	
Lewisham	Conducting options appraisal regarding creation of borough- wide SPV to deliver and manage private rented homes, potentially through corporate relationship with Catford Regeneration Partnership Limited (existing wholly owned subsidiary that manages Catford shopping centre)	
Enfield	Established a wholly owned SPV, which delivers intermediate and private rent homes on behalf of the Council. The revenue income to the SPV covers the build costs of new homes at Council rent which remain within the HRA.	
Wandsworth	andsworth Conducting options appraisal for creation of vehicle to invein private rented homes on borough-wide basis	
Southwark	outhwark Intends to establish a wholly owned SPV to deliver some of the affordable homes in the borough	
Milton Keynes	Has established borough-wide wholly owned LLP vehicle to bring forward development on assets acquired from HCA in 2013, totalling up to 5000 plots.	

- 2.3 The options analysis will include:
- Risk analysis
- Taxation and state aid report
- Best value considerations
- Vires and consent issues
- Legal governance structures

- Financial impact of legal structure including set up costs and obligations once assets are transferred
- Accounting treatments.
- 2.4 Whilst a detailed options analysis will be undertaken, the basic assumptions are that land would transfer from the HRA to a wholly owned Council SPV and developments would predominantly progress on a rented basis with the income from the rental stream being used to pay back borrowing. The borrowing could come from a number of sources including Lambeth prudentially borrowing from the Public Works Loans Board. The SPV would deliver the development on behalf of the Council.
- 2.5 The benefits of this approach include:-
- 2.5.1 This approach will reduce the use of HRA financial capacity, in a situation where the government has set borrowing caps that are outside of our control. Where delivery of social housing is concerned, it is important to demonstrate the reasons for doing this through a company. For the Council, these reasons would include ringfencing development risk, delivering regeneration and socio-economic outputs.
- 2.5.2 There is no financial risk associated with the Right to Buy if the housing is delivered by the SPV as the SPV would be the landlord (and the Council would presumably not have provided social housing grant to the SPV) and therefore the Right to Buy would not arise. The HRA properties would however be subject to the Right to Buy provisions when they are transferred back to the Council
- 2.5.3 The creation of a separate vehicle would give the Council flexibility to leverage in private sector finance by way of equity participation in future years, if desired.
- 2.5.4 This approach means that the Council can ringfence development risk through the use of a limited liability company: a key consideration if it is undertaking activities that are (in recent years) novel, relatively specialist and outside its core areas of operation.
- 2.6 The key disadvantage of this approach is that as a separate company, there will be corporation tax and VAT implications to factor in, as well as additional costs for external audit, IT provision, final accounts and administrative costs. Arguably, many of these costs would be incurred by the council if decided to build new homes through the HRA or General Fund.
- 2.7 There would need to be an element of private sale in order to offer an option for leaseholders to remain on the estates once they have been redeveloped. Delivering market sale within the SPV would potentially generate a profit in the company which would be subject to corporation tax, but could be reinvested into building more homes. Further, the transfer of land from the Council could be subject to an overage agreement which would take account of any future adjustments in the land price so that profits were available to the Council to cross-subsidise delivery of the overall project.
- 2.8 A report will be brought back to Cabinet on the SPV or SPVs. The report will set out in detail the governance arrangements, a risk analysis as well as a benefits analysis for Members to consider.

Progress with estate regeneration and housing delivery

- 2.9 At its meeting on 22 October 2012 the Cabinet agreed the development of a Lambeth Estate Regeneration Programme whereby any estates meeting one or more of the following criteria would be eligible for regeneration:
 - where the costs of delivering the Lambeth Housing Standard are prohibitive, and/or
 - Where residents and the Council have identified that the Lambeth Housing Standard works in themselves will neither address the fundamental condition of the properties nor address many of the wider social and economic issues experienced by residents, and/or
 - where the wider benefits arising from regeneration justify the intervention.
- 2.10 A number of estates have been identified through a process. In addition to estate regeneration a number of other housing sites have been identified which could provide new homes at Council rent.
- 2.11 The table below sets out those estates which form the proposed phases 1 and 2 of the estate regeneration programme:

Phase 1 Estate Regeneration		
Fenwick		
Cressingham Gardens		
Central Hill		
Phase 2: Estate Regeneration		
Knights Walk		
South Lambeth		
Westbury Estate		

2.12 Residents in the phase 1 and phase 2 estates have been contacted and for each project a design team has been appointed to develop options for the estate. This process is still very much at an early stage with residents on Phase 2 estates and the Council will now be proceeding with a more comprehensive engagement programme.

- 2.13 The sites above will form the basis for the Council's estate regeneration programme and a cash flow model will be developed for all of the estates to explore how the Council can balance the number of private homes to maximise the number of homes at Council rent. The model will be flexible enough to allow sites to drop out or be added in, however, at this stage the purpose of the model is to demonstrate that the investment required to deliver the new homes can be repaid by external funding and the income generated from the new homes.
- 2.14 We are committed to working with local residents on plans that affect their homes and will consult residents on estates over the style and architectural design of their estates and their homes and ensure that they are fully involved in the selection of contractors who will carry out the work. We appreciate that this will be a difficult and stressful time for many residents but this is the only way to ensure that Lambeth residents live in high-quality homes and that their children can stand a good chance of securing a home in the borough. The Deputy Cabinet Member for Housing is working with residents to coproduce a charter for the principles that the council will follow throughout the estate regeneration process and a draft is attached to this report (Appendix 1).
- 2.15 The Council will also commission a further study to look at Council assets which are either within or neighbouring some of the borough's major development opportunities such as Vauxhall Nine Elms Battersea (VNEB), Waterloo and Brixton. The study will assess the potential of these areas and translate that into what the benefit could be for the local community. Once the benefits are better understood the Council can then coproduce plans and strategies with the communities living there.

Planning

- 2.16 As the London Borough of Lambeth is the relevant planning authority, the Housing Delivery Team will enter into a Planning Performance Agreement with the Planning team to ensure that as schemes are developed there is input from Planners on the design process. This will reduce the planning risk for projects and maximise the community benefits arising from these developments. A Planning Performance Agreement is common practice and the local planning authority reguary enters into these agreements with developers and housing associations on significant planning applications.
- 2.17 All developments will adhere to the Local Plan as the statutory development plan for the borough. There is no immediate conflict between Local Plan policy (to be adopted in May 2015) and the aspirations of the programme. Policies include specific provisions to allow flexibility in the case of housing estate regeneration projects, for example.
- 2.18 The delivery of these new homes will be essential to delivering the Mayor of London's 'London Plan 2011' housing target, which increases by 30% in the Further Alterations to the London Plan (FALP) 2015. Without estate regeneration, some very difficult decisions will need to be made about where else our housing capacity is going to come from.
- 2.19 The estate regeneration programme will be referred to in the Lambeth Local Plan Review and this will include statutory consultation on a draft document, currently scheduled for November/December 2015. There is potential to include site allocations

and/or amendments to policy wording to support delivery of the estate regeneration programme within the Local Plan Review.

Housing management and housing management models

- 2.20 There is an opportunity within a Council-led estate regeneration programme to consider a range of housing management models. These could range from resident-led management organisations to more complex models such as those being explored on Somerleyton Road.
- 2.21 A Lambeth specification for affordable housing is being developed and this could also be used as a template for all developments within the programme. The specification will set out the standards to which Lambeth will require its new homes to be built to. This will include minimum space standards for new homes, sustainability targets and standards around storage and external space.

Confirm ability to stop Right to Buy

2.19 Cabinet authorises service of the appropriate legal notices suspending the Right to Buy on the identified estates in 2.11, as the estate regeneration programme progresses. This measure enables the Council to firm up and formalise the rehousing offer to residents and the timing of serving the notices will be agreed on a project by project basis in consultation with the Cabinet Member for Housing.

3. Finance

- 3.1 The 30 Year HRA Business plan is being refreshed to include actual capital spend in 2013-14 and incorporate changes to the capital programme and the longer term capital requirement for component renewals post LHS.
- 3.2 There are a number of options under development on how best to fund the Regeneration Programme and each scheme will be assessed on its own merit as well as within the wider HRA Business Plan and against opportunities for alternative funding sources and delivery models.
- 3.3 The full options analysis on the use of a Special Purpose Vehicle will include a comprehensive assessment of the financial implications of the approach including identifying costs of setup and operations which will need to be funded from within the overall estate regeneration programme budgets.
- 3.4 Any acquisition of assets by the SPV means that the Council will need to treat this as a 'disposal' in accordance with statutory legislation either by virtue of s123 LGA 1972 or as a disposal as allowed by the Housing General Consent orders. Any land & property transferred over will need to be valued at point of appropriation /transfer and recorded. In this way it is transparent how much in terms of monetary value LBL have placed into the SPV alongside any other capital from other external financial sources.
- 3.5 The value of these transferred assets will need to be adjusted in the Council's accounts and balance sheet as they will no longer be in Council ownership.

4. Legal and Democracy

- 4.1 In order to suspend the Right to Buy on the esates referred to in paragraph 2.11 above the Council will be required to serve the appropriate legal notices on the residents pursuant to Schedule 5A of the Housing Act 1985. The service of this notice does not prevent the making of a Right to Buy application, or the taking of steps under such an application, however if the Council subsequently serves a notice under Schedule 5 the Right to Buy will not arise whilst it remains in force.
- 4.2 An Initial notice under section Schedule 5A has a maximum life of 7 years and a Final notice under Schedule 5 has a maximum life of 2 years. Where, for what ever reason, the notice ceases to have effect no further notices suspending the right to buy can be served for a period of 5 years.
- 4.3 Section 105 of the Act requires the Council to have in place a scheme to consult with those of its secure tenants who are likely to be substantially affected by matters of housing management which is defined to include the management, maintenance, improvement or demolition of dwelling-houses let by the Council. The consultaion scheme must enable the secure tenants to be informed of the proposals, permit them to make representations, which representations must be taken into account by the Council before any decision is made.
- 4.4 The intention to take this key decision was entered on the Forward Plan on 12 September, therefore the required 28 days notice has been given. The report was published five working days before decision is due to be taken and will be subject to call-in for five days once the decision is published.

5. Consultation and co-production

5.1 The Deputy Cabinet Member for Housing has led a taskforce to coproduce Regeneration Principles to support the work on the estate regeneration programme. These are appended to this report.

6. Risk management

6.1 A programme board is in place which meets on a monthly basis. A highlight report is presented at each meeting and this contains a risk register of both programme and individual project risks.

7. Equalities impact assessment

7.1 An Equalities Impact Assessment will be prepared for the programme and for each individual project.

8. Community safety

8.1 Interventions will adhere to Designing Out Crime principles.

9. Organisational implications

9.1 Environmental

Environmental sustainability will be a key criteria for any proposed interventions and the Council will seek the highest possible standards with the resources available.

9.2 Staffing and accommodation

The programme will be resource appropriately and this may provide opportunities for internal secondments and professional development.

9.3 Procurement

None

10. Timetable for implementation

Site	Description	Decision on preferred option
Cressingham Gardens	Decision on preferred regeneration option.	March 2015
Central Hill	Decision on preferred regeneration option.	June 2015
Fenwick	Decision on preferred regeneration option.	July 2015
Westbury	Decision on preferred regeneration option.	June 2015
South Lambeth	Decision on preferred regeneration option.	June 2015
Knights Walk	Decision on preferred regeneration option.	June 2015
Small sites programme (phase 1)	Agree programme, delivery and procurement strategy of small sites development	July 2015
Establishing an SPV	Decision on SPV	July 2015

Audit trail					
Consultation					
Name/Position	Lambeth cluster/division or partner	Date Sent	Date Received	Comments in para:	
Helen Charlesworth May	Strategic Director Commissioning	03/03/14	25.11.14	Throughout	
Sue Foster	Strategic Director Delivery	03/03/14	25.11.14	Throughout	
Finance clearance	Business Partnering				
Legal clearance	Enabling: Integrated Support: Legal Services	03/03/14	03/03/2014	4.1 to 4.4	
Democratic Services clearance	Enabling: Corporate Affairs: Democratic Services	03/05/2014	25.11.14	Throughout	
Councillor Matthew Bennett	Cabinet Member for Housing	03/05/14	25.11.14	Throughout	

Report history	
Original discussion with Cabinet Member	03/05/14
Report deadline	27.11.14
Date final report sent	27.11.14
Report no.	108/14-15
Part II Exempt from	No
Disclosure/confidential accompanying report?	
Key decision report	Yes
Date first appeared on forward plan	12.09.14
Key decision reasons	Meets community impact test
Background information Report to Cabinet, 22 October 2012 – Lambeth Estate Regeneration Programme: Strategic Delivery Approach Final Report of the Housing Commission – Cabinet report 25 July 2011	http://comp-ap- 75:8071/documents/s50180/06%20Estate%20Regen%20Final_ 22%2010%2012_NV.pdf http://comp-ap- 75:8071/documents/s30424/06%20Housing%20Commission%2_ 0-%20Political%20Context.pdf
Report to Cabinet March 2012 – Lambeth Housing Standard Programme	http://comp-ap- 75:8071/documents/s40594/06%20Lambeth%20Housing%20St andard.pdf
Appendices	Draft Regeneration Principles