CABINET

17 February 2020

Title: Housing Revenue Account: Estimates and Review of Rents and Other Charges 2020/21	
Report of the Cabinet Member for Regeneration and Social Housing	
Open Report with Exempt Appendix 6 (relevant legislation: paragraph 2 of Part I of Schedule 12A of the Local Government Act 1972 as amended)	**For decision**
Wards Affected: All	**Key Decision:** Yes
Report Authors: Michael Westbrook, Head of Housing and Asset Strategy and Katherine Heffernan Group Manager – Service Finance	**Contact Details:** michael.westbrook@lbbd.gov.uk
Accountable Strategic Leadership Directors: Graeme Cooke, Director of Inclusive Growth, and Claire Symonds, Chief Operating Officer	

Summary

The Council as a stock-owning local authority has an obligation to maintain a Housing Revenue Account (HRA). This is the income and expenditure relating to the management of the Council's housing stock and the Council is obliged to set a balanced budget.

This is the first year in which the Council is able to increase rents since the government imposed the 1% rent reduction policy on all providers of social housing from April 2016 for four years. It is proposed that rents increase by CPI + 1% from April 2020. This means an average increase of £2.52 per week, increasing the average HRA rent from £93.35 per week to £95.87 per week.

This report considers the available HRA resources within the context of the wider 30-year Business Plan and proposes the budgets for 2021/21 for both revenue and capital expenditure.

The report also recommends that a number of properties that the Council has acquired on the open market over the last few years are appropriated from the General Fund into the Housing Revenue Account, for the reasons set out in section 8 below.

Recommendation(s)

The Cabinet is recommended to:

(i) Agree that rents for all general needs secure, affordable and sheltered housing accommodation be increased by the Consumer Price Index (CPI) (September 2019) of 1.7% + 1%, from the current average of £93.35 per week to £95.87 per week;

(ii) Agree the following service charges for tenants:

Service	Weekly Charge 2020/21	Increase / reduction
Grounds Maintenance	£2.93	£0
Caretaking	£7.65	£0
Cleaning	£3.68	£0
Estate Lighting	£3.92	£0.07
Concierge	£10.06	£0
CCTV (SAMS)	£6.17	£0
Safer Neighbourhood Charge	£0.50	£0
TV aerials	£0.62	£0.02

(iii) Agree that charges for heating and hot water increase by CPI (September 2019), as follows:

Property size	Weekly Charge 2020/21
Bedsit	£13.34
1 bedroom	£14.16
2 bedroom	£16.99
3 bedroom	£17.30
4 bedroom	£17.75

(iv) Agree that the above charges take effect from 1 April 2020;

(v) Agree the 18-month Investment in Existing Stock programme at Appendix 5 to the report and the HRA Capital Programme for 2020/21, as set out in paragraph 4.4 of the report; and

(vi) Agree that the street purchase properties listed in Appendix 6 to the report be appropriated from the General Fund to the Housing Revenue Account, by use of section 122 of the Local Government Act and section 17 of the Housing Act 1985 for the purposes of Part II of the HRA, on the terms set out in section 8 of the report.

Reason(s)

To assist the Council in achieving its vision of "No-One Left behind" and the priorities of "A New Kind of Council", Empowering People", and "Inclusive Growth" through the provision of an efficient and effective housing service to local residents.

The Council annually reviews housing rents and other and must give prior notification to tenants of the charges for be applied from the new financial year.

1. Introduction and background

Legislative context

1.1 The Local Government and Housing Act 1989 requires the Council to manage its housing stock, and to balance its accounts for the housing stock as a ring-fenced account. This means that the Housing Revenue Account (HRA) does not receive any subsidy from the Government, or from Council Tax, and nor is it allowed to subsidise the General Fund. The legislation sets out those items that can be charged to the HRA.

1.2 The Localism Act 2011 introduced a new method of managing the HRA called self-financing whereby in return for taking on a share of the national housing debt, local authorities could retain any rental surpluses, and manage their HRAs over a 30-year period. It is good practice therefore to maintain a 30-year Business Plan which projects the income that will be received alongside the expenditure required to manage and maintain the properties.

Policy context

1.3 There have been a number of changes in the external environment over the last five years which have had an impact on the HRA Business Plan. The most significant of these was the one per cent rent reduction policy which was imposed through the Welfare Reform and Work Act 2016. This forced all providers of social housing to reduce rents by one per cent for four years from April 2016. This replaced the previous national rent policy of an increase of CPI plus one per cent for ten years, which had itself only come into force in April 2015. The cumulative impact of the rent reduction policy was a loss of approximately £34m of anticipated income over these four years. The compound impact of the rent reduction policy on the 30-year Business Plan is much larger, with a significant effect on the level of resources available within the HRA compared to income assumptions made before the policy came into force.

1.4 More recently, in October 2018 the Housing Revenue Account debt cap was removed. This had set a limit on the amount that local authorities could borrow within their HRAs regardless of the capacity to borrow. The removal of the debt cap gives local authorities more flexibility to use prudential borrowing as part of how they finance their HRA Business Plans, though increased borrowing will increase the revenue cost of interest payments. Authorities will also need to have assurance that any eventual debt repayments are sufficiently provided for.

1.5 In the Queen’s Speech following the December 2019 election, the government re-announced its intention to pass a Building Safety Bill in this Parliament. A draft Bill has not yet been published and it is not yet clear what implications this may have for the HRA Business Plan. The Council has already proactively responded to building safety concerns which have arisen since the Grenfell Tower tragedy, and is already investing significant amounts in a range of works that ensure building safety as part of its stock investment programme.

1.6 A number of measures were passed in the 2016 Housing and Planning Act but which have not been brought into force but remain on the statute book. This includes the forced sale of high value HRA properties, which had been intended to fund the extension of the Right to Buy to Housing Association tenants. This “high value void” policy was dropped by the government in 2018. The new government recently announced that it intends to continue with extension of the Right to Buy to Housing Association tenants – which is currently being piloted in the West Midlands – and to launch further pilot areas in due course. It is not clear at this stage if a future national Right to Buy for Housing Association tenants’ policy would be funded from the sale of high value council HRA properties or the mechanism whereby this would be achieved.

1.7 Finally, the last government published a green paper of social housing entitled ‘*A new deal for social housing tenants’* in August 2018 and held a consultation which ended in November 2018. This indicated an intention to review and update the Decent Homes Standard. At the same time the government also consulted on proposed changes to the use of Right to Buy receipts, including giving more flexibility on how they are used. These would both have had implications for the HRA Business Plan, but responses to neither consultation have been published to date.

2. Rents and Service Charges

Rents

2.1 Rent increases for social housing are determined by government regulation. In October 2017 the government announced a new five-year rent policy from 1 April 2020 which would allow rents to be increased by CPI plus one percentage point. CPI is defined as the rate published by the Office for National Statistics in September of the preceding year. This rent policy was confirmed by the Regulator in October 2019 and the new confirmed Rent Standard was published. A link to the new Rent Standard is contained at the end of this report.

2.2 An increase of CPI + 1% from April 2020 would represent the following average increases:

- Average rent in 19/20: £93.35 per week
- Average rent in 20/21: £95.87 per week

2.3 Overall this would be an average increase of £2.52 per week or £131 per year. The average increase by bed size is shown in the table below:

No of Bedrooms	19-20 Avg. Rent p.w.	20-21 Avg. Rent p.w with CPI +1%	Rent increase p.w.
0 to 1	£78.77	£80.89	£2.13
2	£93.90	£96.44	£2.54
3	£102.29	£105.05	£2.76
4	£128.96	£132.44	£3.48
5	£124.41	£127.77	£3.36
6	£136.50	£140.20	£3.70

2.4 Even with the rent increase, Barking and Dagenham's HRA rents remain the second lowest in London. The average rent of £93.35 per week in 2019/20 was significantly below the average London council rent of £107 per week. The proposed increase returns rents to around the level there were in 2015, before the one per cent rent reduction came into force.

2.5 Research the Council undertook last year indicated that council tenants generally find their rent to be very affordable. To afford the average rent of a Council two bed property, households need an income of around £15k a year (based on the principle that a household should not need to spend more than 35% of their gross income on rent). Around half of council tenants receive housing benefit. The research (based on a sample of tenants) also found that around 2,500 council tenants have a household income of more than £24k per year, while there are around 400 with a household income of £48k or more.

2.6 Rental income represents the most significant source of income for the HRA. As well as rent policy, the amount of income generated from rents is clearly also affected by the number of homes held in the HRA. When the initial self-financing settlement was made, the Council had 18,894 homes. However, shortly after the self-financing settlement was made, the Government increased the discount on Right to Buy properties, which caused the numbers of sales to significantly increase. In the year before the change, 97 homes were sold under the RTB in 2012/13 and then after the change, this rose to 226 sales in 2013/14, and sales have continued at around this level since that date. There were 202 sales in 2018/19.

2.7 A number of HRA properties are also in the process of being decommissioned ahead of demolition as part of estate renewal schemes. There are around 140 HRA properties in estate renewal schemes where the tenants have been rehoused and which are currently being used as temporary accommodation. These properties provide an income to Community Solutions as a management fee for managing the temporary accommodation for homeless households. This is a temporary arrangement as the buildings are all due for ultimate demolition. The loss of temporary accommodation when buildings are prepared for demolition can be partially offset by other accommodation in estate renewal schemes becoming available for temporary accommodation. Around 180 new build units for temporary accommodation will also be delivered through the Be First programme this financial year which will help to stabilise the number of Council-owned temporary accommodation over the longer-term.

2.8 The impact of the rent uplift is forecast to be an increase of £2.254m to the rent budget. This is partly offset by £0.6m for adjustments to stock as set out in the paragraphs above. The net increase in rent is £1.646m.

Service charges

2.9 Tenant service charges are specific charges for services that some tenants receive and others do not. The list of charges which are identified separately are set out below. Landlords may not charge more than the actual cost of the service, plus a reasonable management fee. Not all tenants pay service charges. Around 10,000 do not pay service charges at all, due to the type of property that they occupy. The current and proposed charges are set out below:

Service	Charges for 2019/20	Proposed charges for 20/21	Increase/ reduction
Grounds Maintenance	£2.93	£2.93	£0
Caretaking	£7.65	£7.65	£0
Cleaning	£3.68	£3.68	£0
Estate Lighting	£3.85	£3.92	£0.07
Concierge	£10.06	£10.06	£0
CCTV (SAMS)	£6.17	£6.17	£0
Safer Neighbourhood Charge	£0.50	£0.50	£0
TV aerials	£0.60	£0.62	£0.02

2.10 The charges for heating and hot water are already based on full cost recovery, and these will rise by inflation.

Heating and Hot water charge

Property size	2019/20 Charges(£pw)	2020/21 Charges (£pw)
Bedsit	13.12	13.34
1 BR	13.92	14.16
2 BR	16.71	16.99
3 BR	17.02	17.30
4 BR	17.46	17.75

2.11 The HRA is not currently recovering the full cost of services, which creates a cost pressure. Work is underway to review the services that are charged through service charges and to monitor the quality of these services. This will be done through monitoring key performance measures including resident satisfaction and inspections to check whether estates meet set standards in terms of cleaning, caretaking and grounds maintenance. The aim is to identify a pathway towards full cost recovery of services, supported by a clear articulation of relevant service standards alongside evidence of the quality and consistency of services.

2.12 The small increases to the charges outlined above are matched by increases in costs of delivery and have no net benefit to the HRA. However, failure to increase charges in line with costs results in an increasing pressure. The pressure from not fully recovering the full costs of Caretaking, Cleaning and Grounds Maintenance is estimated to be in the region of £1.4m.

3. Expenditure - Management and Maintenance costs

3.1 The Management and Maintenance of the Council's housing stock is split between a number of service delivery agents. My Place provide landlord services, while functions such as the Housing Register and tenancy support are managed by Community Solutions. My Place also manage and supervise the Repairs and Maintenance service (including void repairs), which is delivered by BDMS.

3.2 The current Local Government pay settlement expires at the end of March 2020 and a new agreement has not yet been reached. The Council is funding 1% of the pay award within the General fund with services being expected to find the balance through efficiencies. 1% uplift has therefore been applied to the pay budgets within Supervision and Management and Repairs and Maintenance.

3.3 The introduction of Universal Credit has been shown in other Local Authority areas to result in a significant increase in arrears requiring increased bad debt provision and enhanced costs of collection. The final impact is assessed to be at least £2.2m increase. As migration to Universal Credit is phased the full impact will not be felt immediately and the current provision is believed to be sufficient having been increased in previous years. This will be kept under close review.

3.4 Changes to the borrowing costs (interest rates) for HRA debt, appropriation of the Street Properties (see below) and the need to increase debt to fund some elements of the capital programme mean an additional interest budget of £1.050m is required.

3.5 The proposed HRA Budgets for 2020/2021 are set out below:

	2019/20	Changes	2020/21
Income			
Dwelling Rents	-83,339	-1,646	-84,985
Non Dwelling Rents	-750	-20	-770
Charges for Services and Facilities	-20,470	-27	-20,497
Interest and Investment Income	-350		-350
TOTAL INCOME	-104,909	-1,693	-106,602
Expenditure			
Repairs and Maintenance	14,104	115	14,219
Supervision and Management	44,844	210	45,054
Rent, Rates, Taxes and other	350	7	357
Provision for Bad Debt	3,309	-	3,309
Interest Charges	9,692	1,050	10,742
Corporate and Democratic Core	685	-	685
TOTAL EXPENDITURE	72,984	1,382	74,366
Available for Capital Expenditure	-31,925	-311	-32,236

4. HRA Capital Programme

4.1 The HRA capital programme is largely funded from the rent income paid by tenants. The Council is required to set aside money every year for ‘Major Repairs’ and may make additional revenue contributions above this. In addition, the Council may use some kinds of capital receipts and following the lifting of the Indebtedness Determination (the ‘borrowing cap’) may borrow in order to invest in its housing.

4.2 The main focus of HRA capital spend is on investment in the housing stock and estates, including achieving and maintaining the Decent Homes Standard and also communal and estate environmental works. In addition, there are Estate Renewal and New Build/Acquisition programmes. More information about these three programmes is given in the sections below.

4.3 London Borough of Barking and Dagenham has had a substantial Housing Capital programme in recent years across all three elements. This has enabled it to reach 91% Decent homes and also funded the development of new social housing schemes including Ilchester Road and North Street, which completed in 2019. However, this required substantial investment of capital receipts. The historic receipts have now mostly been used so any expenditure above the level of revenue surplus will need to be funded from borrowing. The overall capital programme for the next few years will be slightly smaller than in the last few years as a result. This will be balanced out by the Council’s significant investment in new build homes through the General Fund, as explained further below.

4.4 The proposed Capital Programme for 2020/21 is summarised below:

	£000s
Stock Investment Programme	38,457
Estate Renewal	8,000
New Build	2,500
TOTAL CAPITAL	48,957
Financing	
In Year Revenue	-32,236
1-4-1 Receipts	-750
Borrowing	-15,971
	-48,957

4.5 The cost of borrowing is estimated to be in the region of £0.479m a year based on an interest rate of 3%. Approximately half of this will be incurred in the first year.

5. Investment in Existing Stock

5.1 The main focus of HRA capital spend is on investment on the housing stock and estates. The stock investment programme is focused on the following five groups of types of works:

1. Internals (kitchens, bathrooms, boilers and rewire etc)
2. Externals (roofs, windows, doors, rainwater goods etc)
3. Communal / Compliance (fire doors, lifts, communal boilers, lateral mains, water tank replacement, asbestos removal, door entry systems etc)
4. Landlord Works (disabled adaptions, capital voids, energy efficiency)
5. Estate Environmental Works (road surfaces, footpaths, garages etc)

5.2 The 2019/20 programme has included a range of decent homes related internal works including replacement kitchens, bathrooms, boilers and replacement heating systems. Decent homes related external works (roofs, windows and doors etc) which has resulted in over 200 block having been surveyed and works commissioned. The programme has also comprised significant compliance related works (replacement fire doors, fire compartmentation and replacement water tanks etc) as well as adaptations to homes for residents with a disability and a significant estate roads & pathways resurfacing programme. The final spend for this year's programme will be available in April 2019.

5.3 The Investment in Existing Stock programme for 2019/20 was originally approved at a total level of £37m. In addition, there was £5m of works carried forward from the previous year, making a total programme of £42m. A significant proportion of this programme was on new investment programmes for which there is a lead in time (for procurement, specification and planning), and these programmes will continue into 2020/21.

5.4 Cabinet are asked to agree that an additional £30m is added to the overall stock investment budget. This is to fund investment programmes that will be carried out over the next 18 months, with approximately £19m spend scheduled for 2020/21 and £11m for 2021/22. This approval will give authorisation to My Place to start the design and procurement of these works against the agreed budget. The full 2021/22 stock investment budget will be presented to Cabinet for approval as part of the HRA report in early 2021. Further information about the programme is set out in Appendix 5.

5.5 The expected capital spend on existing stock in 2020/21 is £38.5m. This is made up of the programmes continuing from the previous year alongside additional new programmes and recurring capital works such as voids and adaptations.

5.6 The stock investment programme hit its target of fewer than 10% of properties not meeting the Decent Homes Standard. Continuing to reduce this figure to zero so that all council homes are decent is a major aim of the stock investment programme.

5.7 The £30m funding allocation is net of leaseholder contributions. Where works are carried out that benefit leasehold properties the Council may recover the relevant proportion of cost from the leaseholders. This will be used to offset the overall cost of the programme.

5.8 Another major aim of the stock investment programme is to improve the energy efficiency of the housing stock. This will improve thermal comfort for residents and reduce energy bills, while also cutting carbon emissions associated with the HRA stock. This will be guided by the exemplar deep retrofit project that will be undertaken this year of a number of HRA homes on the Becontree as approved by Cabinet in October 2019. Specific funding of £1.5m has been allocated for this programme within the stock investment programme.

6. Estate Regeneration

6.1 The council has an long-standing estate renewal programme. The HRA Estate Regeneration budget funds mainly the costs of tenants and leaseholders' home loss and disturbance payments for those tenants and leaseholders who have to move as a result of the demolition of their homes. In addition, it funds the buyback of homes from leaseholders where these homes are going to be demolished. It has also funded the actual costs of demolition in some locations.

6.2 The current phase of the Estate Regeneration Programme – including the later phases of Gascoigne and schemes such as Roxwell Road and Oxlow Lane – requires a significant number of tenants to be rehoused and leaseholders to be bought back to enable the demolition of the existing estates and construction of new homes. Work is also currently underway to assess estates which could form part of a future estate renewal programme. Any such schemes will be required to demonstrate through rigorous options appraisal that investment in them will be of financial benefit to the HRA.

7. New Build programme

7.1 The main approach to new build for the Council is through General Fund borrowing, with the homes built by Be First and ultimately managed by Reside. The intention is to invest most future RtB receipts in this programme. However there is an intention to fund a small new build programme through the HRA, primarily for specialist housing to support vulnerable residents. The majority of the cost of this programme will be incurred in future years.

7.2 The Housing Capital Programme will be funded through a combination of capital receipts, Revenue Contributions to Capital Outlay (RCCO), the Leasehold Reserve and borrowing. Not all of these funding sources can be used for all these expenditure items, and the funding will be appropriately profiled to the projects.

8. Appropriation of street purchase properties

8.1 The Council owns a number of properties which were purchased under the street purchasing programme and are currently held in the General Fund. A number of these are used to meet particular types of housing need, including for care leavers, people with a learning disability and temporary accommodation for homeless households – these are listed in Appendix 6, which is in the exempt section of the agenda as it contains information which is likely to reveal the identity of individuals (relevant legislation - paragraph 2 of Part 1 of Schedule 12A of the Local Government Act 1972 (as amended)) and the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

8.2 It is proposed that these properties are appropriated by use of section 122 of the Local Government Act and section 17 of the Housing Act 1985 for the purposes of part II of the HRA, and Right to Buy receipts are applied to cover 30% of the acquisition costs. This will reduce the amount needed to be financed from borrowing from around £27m to around £19m. Sufficient Right to Buy receipts have been identified to fund the transfer.

8.3 The Council has put in place arrangements for the management of the properties. It is not proposed that these current arrangements are changed. As such, the transfer of the properties into the HRA will not have any negative consequences for the residents of the properties, including no adverse equality impact.

8.4 The appropriation will move £20m of debt from the General Fund to the HRA., though the HRA will also benefit from increased income through the rent from the properties. It is proposed that this should be long dated debt with a repayment at the maturity of the debt and with an interest rate of 4%. This is stable long-term debt which is more suitable for the HRA (although the interest rate appears high compared with current short term rates it is not abnormal for long term debt).

9. Consultation

9.1 Consultation on the proposals in this report has taken place with the Leader, the Cabinet Member for Regeneration and Social Housing, and the Cabinet Member for Finance, Performance & Core Services.

10. Financial Implications

Implications completed by Katherine Heffernan, Group Manager, Service Finance

10.1 The Council is required to maintain a specific ringfenced Housing Revenue Account for the management of its social housing properties. All expenditure on Social Housing must be fully funded from rental income with no call on general Council funds. The Council is also required to have business planning processes in place to ensure that the HRA remains sustainable over the longer term (thirty years.)

10.2 In the period immediately following the introduction of Self Financing in 2012, HRA finances were relatively buoyant especially when considered over the thirty years of the business plan. However, the four-year rent reduction and the "revitalization" of Right to Buy have both reduced the income achievable from the HRA.

10.3 The requirement to reduce rents has now ended and this report proposes that Council rents should increase by the maximum amount permitted which is 2.7%. This brings in £1.6m additional income to the HRA. The increase in funding from staff pay increases and other cost inflation amounts to £0.332m. In addition, there is an increase in interest costs from borrowing to fund capital expenditure of £1.05m. The net revenue surplus is £32.236m. This is a higher surplus than last year's budget by £0.311m and will be reinvested into the Capital Programme.

10.4 In previous years despite the constraints in rental income the use of the built-up reserve of capital receipts enabled the Council to continue to invest in its Social Housing. This historic reserve is now mostly used up. The Council is able to make use of borrowing to fund capital expenditure and will do so for some elements of this year's programme. The Housing Capital Programme will be funded through a combination of capital receipts, Revenue Contributions to Capital Outlay (RCCO), the Leasehold Reserve and borrowing. Not all of these funding sources can be used for all these expenditure items, and the funding will be appropriately profiled to the projects.

10.5 This report proposes that the Council appropriates properties bought under the Street Purchasing programme to the HRA as they are being used as Social Housing. This does not affect the Council's overall financial position but will result in an increase in the Housing Capital Financing Requirement (CFR) and a decrease in the general fund CFR. The HRA will benefit from the rental income generated by these properties but will assume responsibility for their management and maintenance and the financing costs from their acquisition.

11. Legal Issues

Implications completed by Dr Paul Feild, Senior Governance Solicitor

11.1 The basis for setting rent is Section 24 of the Housing Act 1985 which provides that a local housing authority may make such reasonable charges as they determine for the tenancy or occupation of their houses.

11.2 Section 76 Local Government and Housing Act 1989 places a duty on local housing authorities to: (i) to produce and make available for public inspection, an annual budget for their HRA, which avoids a deficit; (ii) to review and if necessary, revise that budget from time to time and (iii) to take all reasonably practical steps to avoid an end of year deficit

11.3 The report requests Cabinet agreement to the exercise of the Council's power to appropriate land under section 122 Local Government Act 1972 and acquire it under section 17 of the Housing Act 1985 for the purposes of public housing pursuant to Part II of the Housing Act 1985.

11.4 In exercising the power consideration will need to be given as to whether there are any persons currently residing in the earmarked properties and such consultation as required to take account of the Human Rights Act 1990 and an equalities impact assessment shall inform the process.

12. Other Implications

12.1 **Equality implications –** the implications of transferring the street purchase properties into the HRA are considered in the body of the report.

12.2 **Risk Management –** There are a number of risks associated with the delivery of estate renewal projects. The recommendations in this report are designed to help ensure delivery of these projects.

12.3 **Safeguarding Adults and Children –** None directly arising from this report. Specific estate renewal proposals and rehousing programmes will need to take into account safeguarding considerations.

12.4 **Property / Asset Issues –** None directly arising from this report – specific estate renewal proposals will need to take into account relevant asset issues.

Public Background Papers Used in the Preparation of the Report:
Rent Standard from April 2020 (Annexe 2 of linked document):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/847359/Decision_Statement___Consultation_on_the_Rent_Standard_FINAL.pdf

List of appendices:

- Appendix 1 - HRA Working Balances
- Appendix 2 - Average rent analysis
- Appendix 3 - Budget assumptions
- Appendix 4 - HRA Budget Summary 2020/21
- Appendix 5 - HRA Investment in Existing Stock – 2019/20 to 2021/22
- Appendix 6 - List of street properties to be appropriated (exempt document)