London Borough of Hammersmith & Fulham

CABINET





PROPOSAL FOR AN AFFORDABLE HOUSING DELIVERY FRAMEWORK

Report of the Cabinet Member for Economic Development and Regeneration – Councillor Andrew Jones and the Cabinet Member for Housing – Councillor Lisa Homan

Open Report

Classification - For Decision

Key Decision: Yes

Wards Affected: All

Accountable Director: Jo Rowlands - Director of Housing Growth & Strategy

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1. EXECUTIVE SUMMARY

- 1.1. The Council is seeking to work with housing providers to deliver the development of up to 800 new homes in the borough on Council owned sites over six years.
- 1.2. The Council proposes to create a Developer Framework that will enable it to use a mini tender procedure to identify and select suitable housing providers, to deliver each site as required.
- 1.3. The overall objectives of this project are to:
 - Deliver more genuinely affordable homes outside the regeneration / opportunity areas through creative partnerships with housing providers
 - Council to maintain nomination rights
 - Deliver these homes as soon as possible
 - Enable use of Council resources to support affordable housing (S106, capital receipts and Right to Buy 'RtB' receipts)

2. RECOMMENDATIONS

- 2.1. That approval be given to the creation of an Affordable Housing Delivery Framework with local Housing Providers using the competitive procedure with negotiation route.
- 2.2. To delegate authority to the Director for Housing, Growth and Strategy in consultation with the Cabinet Member for Economic Development and Regeneration and the Cabinet Member for Housing to implement the procurement strategy identified in Appendix 1 and to take all necessary steps to complete the procurement process.
- 2.3. To delegate authority to the Director for Housing, Growth and Strategy in consultation with the Cabinet Member for Economic Development and Regeneration and the Cabinet Member for Housing to appoint selected providers to the framework agreement and to award subsequent call off contracts.
- 2.4. To approve the appointment of Trowers and Hamlins using the Crown Commercial Services Legal Services Framework under a direct call off to provide specialist legal advice for the procurement process at a contract value of £60,000.
- 2.5. To approve a waiver from the contract standing orders to appoint DS2 Ltd to provide professional advice on commercial aspects of the procurement process at a contract value of £35,000..
- 2.6. To note that the total costs of £95,000 for the above professional services for the period February 2017 to October 2017 will be funded from existing Housing Revenue Account budgets.
- 2.7. Cabinet to note that officers will progress early site investigations and design work as necessary to prepare the identified sites.
- 2.8. Cabinet to note the proposed delivery timetable of the procurement process for the 'Affordable Housing Delivery Framework'.

3. REASONS FOR DECISION

- 3.1. In May 2015 the Council's Housing Strategy was refreshed with the publication of 'Delivering the Change we need in Housing'. This document sets out how the Council wants to re-invigorate relationships with other housing providers and take a more pro-active approach to their activities in the borough. The Council also wishes to move to a more collaborative local approach to the housing management services provided in the borough regardless of landlord; this requires re-engagement with our Registered Providers.
- 3.2. The full business case and procurement strategy can be found in Appendix 1.

4. PROPOSAL AND ISSUES

- 4.1. The objectives of the affordable housing delivery framework across the sites are:
 - The creation of more affordable homes, with nominations to the Council
 - The delivery of these homes as soon as possible
 - Use of the Council's subsidy (predominately Right to Buy receipts but also \$106 and capital receipts as appropriate)
 - Deliver new affordable homes based on a mix of 60% social or affordable rent and 40% intermediate housing (40%), with the potential for some private housing to cross subsidise sites and maximise delivery
 - Select potential providers who can demonstrate the affordability of any new homes
 - Select potential providers who can demonstrate strong management and maintenance experience
 - Create new homes that meet the accessibility needs of residents
 - Delivery environmentally friendly homes and contribute to greening the borough
- 4.2. The Framework will involve selecting a number of housing providers with whom the Council will contract to deliver the above outputs on HRA and General Fund owned land. The housing providers will construct, own and operate the new units.

Implementation plan

- 4.3. Given the relatively long lead in for procurement, it is suggested that the Framework is set up simultaneously to the commencement of early site work to ensure the programme can be delivered as quickly as possible.
- 4.4. A high level implementation plan/timeline can be found in Section 12 of Appendix 1: Procurement Strategy
- 4.5. The procurement process will be overseen by the Tender Appraisal Panel (TAP) comprising of representatives from: Housing & Regeneration, Legal, Asset Management, Procurement and Finance.

Specialist Advisors

- 4.6. Trowers & Hamlins will be appointed to provide legal advice to the Council on the procurement process using the Crown Commercial Services Legal Services Framework under a direct call off.
- 4.7. DS2 will be appointed to provide procurement and commercial advice to the Council during the procurement process, including the evaluation of the commercial offer from housing providers. DS2 are development consultants and acknowledged experts in this field. They are familiar with the procurement proposed and the market that the Council is working with, and so a waiver

from the Contract Standing Orders is being used for their appointment. Their fee proposal is value for money.

5. OPTIONS AND ANALYSIS OF OPTIONS

- 5.1. To deliver affordable housing on sites identified the Council has several options which are discussed in full in section 3 of Appendix 1 (Procurement Strategy).
- 5.2. Overall the route that best meets the Council's objectives of flexible, rapid delivery that provides value for money is to develop a Framework of Housing Providers (Option 5). This is explored in more detail in the appendix.
- 5.3. The options for the Council have been reviewed by Trowers & Hamlins and they have recommended that the Council follow a Competitive procedure with negotiation route in order to create a framework. This will allow the Council the flexibility to negotiate terms with bidders.
- 5.4. Full details of the procurement options are set out in Appendix 1.

6. CONSULTATION

- 6.1. Initial consultation has been carried out with housing providers with properties in the borough regarding the procurement of a Framework. The discussions have been met with a positive response.
- 6.2. Internal consultation has included colleagues in the Asset Management Service, Corporate Procurement and Housing & Regeneration Services.
- 6.3. Extensive consultation has been carried out with residents and the Council is up to date with residents expectations.

7. EQUALITY IMPLICATIONS

7.1. There are no equalities implications at this time, but individual projects that result from the framework will require equality assessments. However, the creation of more affordable housing will assist in tackling income inequality through reductions in housing costs

8. LEGAL IMPLICATIONS

- 8.1. As the council is seeking to impose control over scheme output for development on the land it will be disposing of, it is likely that it will be subject to the regulations and be subject to the EU procurement regime. Had the Council being relying on planning regulations and broad usage and overage clauses in a sale contract it could have proceeded without a EU procurement process.
- 8.2. The Council is able to use the Competitive Procedure with Negotiation route for the reasons identified in paragraph 3.3.2 of Appendix 1.

- 8.3. The Competitive Procedure with Negotiation (CPN) and Competitive Dialogue processes are very similar. However, using the Competitive Dialogue tends to put the market off bidding for contracts as it has connotations of a lengthy and expensive process. It is not the intention to have lots of negotiation meetings for this procurement process, although the Council wishes to ensure that there is an option to have meetings and to negotiate the bids if required. It was felt that the Competitive Procedure with Negotiation allows this without putting the Council at risk of a procurement challenge (which could have happened if the restricted procedure were used where only clarifications are permitted).
- 8.4. The fact that legally no amendments can be made after the final tenders have been submitted would give a clear message to the market that there would be no drawn out preferred bidder negotiations (and a risk that commercial positions will change) and ensure that the timetable was adhered to.
- 8.5. Whilst the timetable is challenging, it is not the intention to have extensive negotiations with bidders. The timetable is based on a typical restricted procedure with additional time added to have a limited number of negotiation meetings with bidders.
- 8.6. The advice above has been provided by Trowers and Hamlins LLP who are the legal advisors in this matter.
- 8.7. In relation to the appointment of Trowers and Hamlins LLP, the Council may access the Legal Services Framework Agreement (RM919) set up by the Crown Commercial Service (the Framework Agreement). The direct call-off must be made in accordance with the terms of the Framework Agreement.
- 8.8. In relation to the appointment of DS2 Ltd, in accordance with section 3.1 of the Council's Contract Standing Orders the relevant Cabinet Member acting on advice by the Director may approve the requested waiver. The Council is required to publish a notice of the award of the contract on Contracts Finder within a reasonable time.

Implications completed by: Kar-Yee Chan, Acting Principal Solicitor, Shared Legal Services, 020 8753 2772

9. FINANCIAL IMPLICATIONS

- 9.1. The one-off costs of £95,000 will be funded from existing budgets within the Housing Revenue Account as the framework agreement should provide additional affordable homes which for example downsizing Council tenants could transfer to if they wanted to. It will be funded from the predicted 2016/17 underspend and for the sake of flexibility will be available from the point this report is approved.
- 9.2. Total spend cannot exceed £95,000 and Development & Finance officers must regularly monitor the spend associated with setting up the framework to

- ensure that any financial risk or requirement for additional funding can be identified at the earliest opportunity.
- 9.3. It is expected that these costs will be recovered from the selected housing providers as part of the terms of their participation in the framework.
- 9.4. As the plan is expected to expedite the delivery of affordable homes, this will reduce the risk that the Council may have to repay RtB receipts and pay the associated interest in accordance with the RtB retention agreement that the Council entered into with Central Government in June 2012.
- 9.5. This report seeks to create a framework agreement for affordable housing delivery. Full financial appraisals and appropriate Cabinet reports will need to be done for each individual site as it comes forwards.
- 9.6. It is expected that the majority of homes will be provided on Housing land and full market value would need to be paid for any General Fund sites used as part of this programme to ensure the ongoing viability of the General Fund Capital Programme.
- 9.7. Implications completed by: Danny Rochford, Head of Finance, Ext. 4023.

10. IMPLICATIONS FOR BUSINESS

10.1. The framework has the potential for local businesses within the construction supply chain to benefit from the development of affordable housing, and the procurement includes opportunities to include this as discussed in section 6 of Appendix 1.

11. OTHER IMPLICATION PARAGRAPHS

Risk Management

11.1. A summary of the key risks is provided below. The project has a risk register.

Risk	Mitigation		
Lack of market interest	Soft market testing has already begun and clear		
	market appetite demonstrated		
Procurement challenge	Clear advice from Trowers on the options		
	available to the Council.		
	Procurement and legal teams involved in TAP to		
	review documentation and agree approach.		
	Work with market so they understand the		
	proposals.		
	Clear record keeping demonstrates approach		
Failure to meet timetable	Clearly planned project plan and careful		
	management of clarification process		
Poor quality bids and bidders	Clear brief and ITT		
appointed to framework	Clear ITT questions on quality of delivery and		
	management of providers		

Procurement

- 11.2. Although a Service Review Team was not convened to undertake a review of the proposed procurement, the Commercial Director and the Corporate Procurement Team will be engaged with the Tender Appraisal Panel and providing support throughout the formal procurement process.
- 11.3. The Commercial Director agrees that the appended Procurement Strategy for the use of the Competitive Procedure with Negotiation in accordance with paragraph 8.12.3 of the Council's Contracts Standing Orders.
- 11.4. Comments provided by Alan Parry Interim Head of Procurement 020 8753 2581.

Health and Wellbeing

11.5. The delivery of new affordable housing creates an opportunity to tackle the complex health and wellbeing issues associated with poor quality housing.

12. BACKGROUND PAPERS USED IN PREPARING THIS REPORT

12.1. None.

LIST OF APPENDICES:

Appendix 1 – Procurement Strategy

APPENDIX 1: PROCUREMENT STRATEGY

PROPOSAL FOR AN AFFORDABLE HOUSING DELIVERY FRAMEWORK

1. BUSINESS CASE

- 1.1 In May 2015 the Council's Housing Strategy was refreshed with the publication of 'Delivering the Change we need in Housing'. This document set out how the Council wishes to engage with residents to create a collaborative approach to finding solutions to the housing crisis.
- 1.2 The Council wants to re-invigorate relationships with other housing providers and take a more pro-active approach to their activities in the borough. The Council also wishes to move to a more collaborative local approach to the housing management services provided in the borough regardless of landlord; this requires re-engagement with our housing providers.
- 1.3 The Council is carrying out direct delivery of new affordable homes through the direct delivery programme as well as through its Joint Venture (JV) with Stanhope. There are also further Council owned sites with the potential capacity for circa 800 new homes that the Council now wishes to develop for affordable housing.
- 1.4 The Council is also mindful of the cost of housing in the borough and therefore the new homes will be a mix of social or affordable rent (60%) and intermediate housing (40%). The affordability of the new homes will be a key part of the selection process as well as quality of the homes and their long term management.
- 1.5 In order to maximise the benefits to the Council in working in collaboration with housing providers operating in the Borough it has been decided to embark on a formally procured framework rather than merely treating the programme as a series of land disposals this is on the basis that via a formally procured framework, the Council will be able to impose far greater control over scheme output than would be the case (as permitted by European legislation, case-law, and guidance) if the land were merely sold which would be limited to planning obligations and protections to protect the Council in relation to (broad) usage, overage and re-acquisition in the event of absolute non development.. In this case the arrangement is likely to be classified as a public works contract and therefore subject to the EU procurement regime.

2. FINANCIAL INFORMATION

2.1 In order for the Council to proceed with the procurement process, the following specialist advice for legal and professional advice will be required. Costings are set out below:

Legal Advice

2.2 Total budget of £95,000 for the period February 2017 to July 2017 to cover the procurement process of the Framework.

3. OPTIONS APPRAISAL AND RISK ASSESSMENT

3.1 The following options have been considered:

Option 1: Act as Developer to build new homes -

The Council could directly manage the build process, employing relevant specialists and consultants, and selecting a developer through a procurement process.

Option 2: Procure one Company for all sites -

The Council could procure a single company to work with the Council to deliver homes across all 40 sites

Option 3: Set-up a single Joint Venture (JV) entity for all sites -

Create one Joint Venture company for the delivery of all identified sites

Option 4: Procure Companies on a site-by-site basis -

Run a separate procurement exercise for each site

Option 5: Develop a Framework of Companies -

Set up a Framework of housing providers and select through mini-competition as required

3.2 The strengths and challenges of each option are considered in the table below:

Route	Strengths	Challenges
Option 1: Act as developer	 Council retains full control of the sites Council retains development profit 	 Risk is not shared but falls solely on the Council Council lacks expertise Council has limited borrowing and RTB resources available

Route	Strengths	Challenges
Option 2: Procure one company	 Single procurement exercise – likely to be faster Able to build a strong relationship with one company Only one contract to manage Risk is transferred 	 Different types / size of sites may be attractive to different company and are unlikely to all appeal to a single company If the relationship fails or performance is not as expected the Council will still be reliant on the single company Does not achieve the aim of collaborating widely with the different housing providers in the borough Less flexible to a changing development programme / the addition of new sites
Option 3: Set-up a single Joint Venture (JV)	 Single procurement exercise – likely to be faster Only one entity to manage One JV partner who the Council can build a relationship with Some risk is transferred to the JV 	 Different types / size of sites may not be attractive to the JV partner If the relationship fails or there are performance concerns the Council will remain bound to the JV for the whole programme Does not achieve the aim of collaborating widely with the partners in the borough Less flexible to a changing development programme / the addition of new sites
Option 4: Procure on a site-by- site basis	 The most suitable company for each site can be chosen It is easy to add or remove sites from the programme as there is no contractual obligation to develop If new organisations enter the market they will be able to bid 	 Multiple OJEU procurements with long lead ins which are expensive and time consuming for the Council and bidders Need to generate sufficient interest in each procurement exercise to ensure competition

Route	Strengths	Challenges
Option 5: Develop a Framework of Companies	 The most suitable companies for each site can be chosen It is easy to add or remove sites from the programme as there is no contractual obligation to develop The Council can build a relationship with the 6 companies on the Framework Mini-competitions for each site to encourage competitive pricing and innovation Single OJEU procurement exercise is less arduous Framework can be open for use by other LAs, helping to build relationships Risk is shared Able to be flexible about the approach to each site To have a streamline process for the delivery of schemes 	 Limited to the organisations on the Framework Time consuming procurement exercise Less work for each company may mean a weaker relationship is built Council resource required to manage the Framework

3.3 The preferred approach is Option 5 relating to the establishment of a framework agreement to manage the project. The law provides the Council with three procurement routes in order to establish a framework agreement. These are:

3.3.1 The Restricted Procedure (RP)

This is the most common OJEU procurement route. A standard form of documents should be used which require little or no amendment. The Council has never accepted qualified bids, but there is a temptation by bidders to mark-up or amend contract and tender documentation. To accept a qualified bid will leave the Council open to challenge in the Courts. Consequently, the Council is not able to explore different models with bidders. If there were a number of unsuitable commercial positions put forward by bidders, the Council's only option would be to abandon the procurement and undertaken direct negotiations using a different procedure.

- **3.3.2 Competitive Dialogue** (CD) or **Competitive procedure with negotiation** (CPN). Both of these procedures are very similar, but there are statutory constraints under-which they can be used. The Regulations permit their use only in the following situations
 - (a) with regard to works, supplies or services fulfilling one or more of the following criteria:—
 - (i) the needs of the contracting authority cannot be met without adaptation of readily available solutions;
 - (ii) they include design or innovative solutions;

- (iii) the contract cannot be awarded without prior negotiation because of specific circumstances related to the nature, the complexity or the legal and financial make-up or because of risks attaching to them;
- (iv) the technical specifications cannot be established with sufficient precision by the contracting authority with reference to a standard, European Technical Assessment, common technical specification or technical reference:
- (b) with regard to works, supplies or services where, in response to an open or a restricted procedure, only irregular or unacceptable tenders are submitted.
- 3.4 There is anecdotal evidence that the Housing Sector prefers the Competitive Procedure with Negotiation over Competitive Dialogue as the latter is perceived to be too onerous. This was expressed by registered providers during soft market testing. The main differences between CPN and CD is that under CPN the Council is permitted to reserve the right to evaluate and award a contract based on initial tenders (if they are sufficiently detailed) or to have some negotiations to clarify aspects of the initial tender. Once final tenders have been received no further clarifications are permitted. Whereas under CD the focus between the Council and bidders is on dialogue, not negotiation, but once final tenders have been accepted the Council is permitted to undertake clarifications with the successful bidder.
- **3.5** Both procedures need to be adequately resourced. They require extremely careful planning in terms of meetings, venues and officers who will need to be involved in either negotiations or dialogue sessions.

4 THE MARKET

- 4.1 From the work that Trowers & Hamlins have undertaken with other local authorities, there is an increasing appetite amongst the part of housing associations and other housing providers to work in partnership with local authorities in order to produce developments which are more "council acentric". This is re-enforced by the fact that a number of influential independent reports into housing supply (for example the Elphicke-House Report commissioned by the coalition government and the Lyons Review commissioned by the Labour party, both focused on the need for collaborative working between the local authorities and others (including the housing association sector) in order to be boost housing supply. The proposed framework procurement which is envisaged here plays well to those findings.
- 4.2 Initial soft market testing has taken place with local housing associations to better understand the level of interest in the proposed framework. The feedback received has identified that there is appetite in the marketplace to bid for this type of framework, that the opportunities available are understood and that the proposed process (CPN) is well understood and the preferred procurement route. A record of these meetings has been recorded and will continue to be monitored during the procurement process (as stipulated under Regulation 84).

5 PROCUREMENT STRATEGY

- 5.1 It is envisaged that the successful housing providers will be required to enter into site-specification development agreements for council owned sites which are transferred to them for development.
- 5.2 In broad terms, it is envisaged that the development agreement would contain outcome focused commitments by the housing provider which the Council would not otherwise be able to impose through a combination of the land sale agreement and/or the planning process. Examples are likely to include:
 - A contractual commitment to deliver social or affordable rent and/or intermediate housing at a level which is higher than the Council's current planning policy
 - Requirements in relation to tenure split
 - Requirements in relation to the type of accommodation to be built on the site (so, for example, the Council could require the delivery of family accommodation in preference to flatted accommodation)
 - Requirements in relation to scheme design, etc. so including for an example the right for the Council to attend design meetings and to provide a "decisive influence" over these matters.
 - Commitments in relation to the release by the Council of retained monies held by it under the terms of the Right to Buy Retention Agreement
 - Commitments in relation to the environmental performance of the accommodation being built

6 SOCIAL VALUE, LOCAL ECONOMIC AND COMMUNITY BENEFIT

- 6.1 The Public Services (Social Value) Act 2012 introduces a requirement to consider, at the preparation stage of a procurement exercise, how the procurement exercise itself and the contract(s) to be procured might improve the economic, social and environmental well-being of the area.
- 6.2The Act itself only applies to the procurement of services contracts, and not for works contracts or works frameworks. [However, the policy of the Council, as stated on its website, is that consideration will be given to social value for other types of contract.]
- 6.3A similar approach will therefore be followed for this procurement. The approach will be developed throughout the pre-procurement period, but considerations could include:
 - Encouraging or requiring companies to advertise for sub-contracting opportunities and employment vacancies openly and in a manner which may be brought to the attention of local businesses and individuals.
 - Applying Council housing priority policies to the disposal of new affordable homes.
 - Encouraging the use of apprenticeships, training schemes and work experience placements for larger projects.

- Setting appropriate standards for environmental performance and considerate construction.
- Requiring engagement with local communities in the vicinity of new projects and taking account of their views.

7. OTHER STRATEGIC POLICY OBJECTIVES

7.1. The Proposal for an Affordable Housing Delivery Framework ties in closely with the Council's Housing Strategy (May 2015). The Housing Strategy looks at ways to develop new partnerships with Housing Providers.

8. STAKEHOLDER CONSULTATION

- 8.1. Initial consultation has been carried out with Housing Providers with properties in the borough regarding the procurement of a Framework. The discussions have been met with a positive response.
- 8.2. Internal consultation has included colleagues in the Asset Management Service, Corporate Procurement and Housing & Regeneration Services.

9. PROCUREMENT PROCEDURE

- 9.1. The options for the Council have been reviewed by Trowers & Hamlins and they have recommended that the Council should undertake a Competitive procedure with negotiation route. It is their view that it will allow the Council the flexibility to discuss the tenders with bidders, while avoiding the perceptions of the market in regards to competitive dialogue.
- 9.2. **Regulation 84 Report/Documents**: As part of the procurement process the Regulations require the Council to ensure that it keeps sufficient documentation to justify decisions taken in all stages of the procurement procedure, including
 - (a) communications with economic operators and internal deliberations,
 - (b) preparation of the procurement documents,
 - (c) dialogue or negotiation if any,
 - (d) selection and award of the contract.

10. CONTRACT AWARD CRITERIA

- **10.1. Works and Services**: In assessing the Framework tenders for works and services, it is proposed that the submissions will be judged 60% on quality and 40% on price. This will enable the Council to take a holistic view of bidders, taking into account the broader value of the development to the borough.
- 10.2. The quality to be based upon:
 - Development experience and capacity
 - Design and quality of homes
 - Nominations and rent levels
 - Additional social benefit for tenants and the borough

- The price to be based upon:
- Land receipt or subsidy required
- Financial capacity
- Financial return if via JV route

11. PROJECT MANAGEMENT AND GOVERNANCE

- 11.1. **Members**: Regular updates will be provided by the Director of Housing Growth & Strategy to the Cabinet Member for Economic Development & Regeneration Andrew Jones and the Cabinet Member for Housing Lisa Homan.
- 11.2. **Internal**:The Housing Growth and Strategy Directorate will manage this process and ensure that internal colleagues in Procurement and Legal are well informed of the progress and any decisions made.

11.3. **External**:

- 11.3.1. Trowers and Hamlins will provide specialist Legal advice.
- 11.3.2. DS2 will provide specialist Procurement advice, Development Services with a focus on development viability, affordable housing, valuation and transactional services.
- 11.4. Tender Appraisal Panel (TAP): A TAP will be set up to monitor the progress of the Affordable Housing Framework procurement process. The TAP will include representatives from: Housing & Regeneration, Legal, Asset Management, Procurement and Finance as appropriate. This forum will provide updated to the Lead Director of Housing.

12. INDICATIVE TIMETABLE

- 12.1. A high level Procurement Timetable is provided as a guide below:
 - January to February 2017: Complete soft market testing with potential housing providers.

 March to April 2017 Set out timescale for site delivery Complete pre-procurement activity

Publish OJEU notice

May to June 2017 Return of selection questionnaires by

bidders

Assessment by Council and responses

issued to unsuccessful bidders

Invitation to Tender (ITT) issued to

successful bidders

• July to August 2017 Return of ITT by bidders

Review by Council of ITT responses

Meetings will bidders

September 2017 Call for final tenders

Evaluation of ITT by Council

• October 2017 Issue of de-selection letters

Alcatel stand still period

Council sign off on Framework Agreements

with successful companies

13. CONTRACT MANAGEMENT

13.1. The Framework will be managed by the Housing Growth and Strategy Directorate under the Head of Housing Strategy.

13.2. Key Performance Indicators (KPIs) will be developed as part of the procurement process.