From: Alesia Powley

To: <u>DL All Council Members</u>; <u>Jack Miller (Councillor)</u>; <u>Mohammed Mazi (Councillor)</u>

Cc: <u>Jane Edmends</u>

Subject: Common allocation Policy Customer Consultation 7th October 2024

Date: 03 October 2024 11:17:20

Attachments: SBC & MBC Final Letter CAP Consultation.pdf

SBC FAO CAP Review Consultation.docx 241001 MHCLG DPM letter to Councils - Social and Affordable Housing.pdf

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This document was classified as: OFFICIAL

Hello

Stockton-on-Tees Borough Council alongside Middlesbrough Council, Redcar & Cleveland Borough Council, Beyond Housing and North Star Housing operate a Common Allocations Policy for the allocation of social/affordable housing. The partnership have recently conducted a review of the current policy and are proposing several changes which will now be subject to consultation. The majority of customers will receive an email inviting them to complete the online consultation, however a small number of customers will receive a copy of the attached letter.

We have received correspondence dated 01.10.24 from the Ministry of Housing Communities and Local Government (attached) which references that changes will be brought forward to social housing allocations regulations to exempt all veterans from local connection and residency tests to facilitate their access to social housing, alongside exemptions for domestic abuse victims and care leavers. The letter advises that the MHCLG will convene roundtables with stakeholders to explore the detail of these exemptions further and consider what more needs to be done to support vulnerable cohorts. We would like to acknowledge that although this is not directly referenced within our consultation, we will respond accordingly.

We appreciate that not all members will receive queries in relation to the consultation nevertheless we would like to provide you with some information in advance. Attached is a copy of a Frequently Asked Questions document, if you receive any queries which are not detailed within the document or would like any further information on the consultation, please contact strategichousing@stockton.gov.uk

Thank you

Kind regards

Alesia Powley

Strategic Housing Officer

Stockton-on-Tees Borough Council

Telephone: 01642 528788 | Email: alesia.powley@stockton.gov.uk | Web: www.stockton.gov.uk



My Ref: TVHF

Stockton-on-Tees Borough Council,
Dunedin House,
Columbia Drive,
Thornaby,
Stockton-on-Tees
TS17 6BJ

Tel: 01642 524345

Email: TVLP@stockton.gov.uk

Date: 07/10/2024

Dear Mail merge name

We are writing to you as a Tees Valley Home Finder account holder to inform you that due to an increased demand for housing the Tees Valley Lettings Partnership are considering making changes to their Common Allocations Policy. The Lettings Partnership consists of:

- Beyond Housing
- Middlesbrough Council
- North Star Housing
- Redcar & Cleveland Council
- Stockton-on-Tees Borough Council

A Common Allocations Policy sets out the rules that decide who can apply for social housing and the priority they will be given. The main changes we are consulting on are, our priority bands, local connection criteria and the exemption periods in relation to anti-social behaviour.

We are consulting with all applicants, social landlords and relevant stakeholders to seek their views and opinions and we would like to hear from you!

If you would like to participate in the consultation, please complete the enclosed questionnaire and return in the pre-paid envelope provided. Alternatively, you can complete the consultation online via https://www.stockton.gov.uk/current-consultations

The closing date of the consultation is Monday 18th November at 12pm.

If you require a copy of the consultation in an alternative format, please email strategichousing@stockton.gov.uk or call 01642 524345.

Yours Sincerley

The Lettings and Nominations Team on Behalf of Middlesbrough Council and Stockton-on-Tees Borough Council.

Customer name Address line one Address line two Address line three Address line four Postcode



Common Allocations Policy Review Consultation

As you are aware Stockton-on-Tees Borough Council alongside Middlesbrough Council, Redcar & Cleveland Council, Beyond Housing and North Star Housing operate a Common Allocations Policy for the allocation of social/affordable housing. The partnership have recently conducted a review of the current policy and are proposing several changes which will now be subject to consultation. The following frequently asked questions have been developed to support with any customer queries you may receive during the consultation period.

Frequently Asked Questions

Why has the policy been reviewed?

Due to the increased demand for social/affordable housing within the partnership areas and the financial pressures currently faced by Local Authorities and Registered Providers a review of the current policy was undertaken to establish if the policy was creating any obstacles to customers in housing need securing suitable housing. The current number of applications listed by priority banding is detailed within the table below.

Stockton Customers with a Live Tees Valley Home-Finder Account – Q1 2024		
Band One	256	
Band Two	552	
Band Three	471	
Band Four	1824	

^{*}Source HFSoT BUP 24/25 Reporting & Monitoring

In 2024 there has been an average of 16 properties advertised per week and each advert attracts on average 113 bids.

When was the current policy reviewed, and proposals identified?

The review exercise took place between April 2024 and August 2024.

Representatives from all the partnership areas were invited to join a review task and finish group. The group met in person on several occasions and a detailed review of each section of the current policy was undertaken.

What are the proposed changes?

The proposed changes are detailed within the consultation. A copy of the consultation is attached in **Appendix A**.

This document was classified as: OFFICIAL



Will any customers be placed at a disadvantage?

Applications registered prior to the implementation of any new policy changes will not be disadvantaged by the introduction of a new policy.

A current applications priority banding would only be reviewed if there is a change in the applicant's circumstances or they would qualify for a high banding following the introduction of the new policy.

Who will be consulted?

We are consulting with all customers who have a fully registered live Tees Valley Home-Finder account, Registered Providers and a range of wider partners including Temporary and Supported Accommodation providers and the VCSE Sector.

When will the consultation begin?

The consultation will begin on Monday the 7th October and run for six weeks, ending at 12 noon on Monday the 18th November.

The partners will consider all comments received throughout the consultation process and this information will inform any final changes to the policy.

How can customers make their views known?

Most customers will be contacted via email and asked to complete an online questionnaire available on the Councils website. For those customers without email they will be contacted via post and provided with a paper copy of the questionnaire and a pre-paid returns envelope.

What do I do if a customer/partner/stakeholder contact me with a question regarding the consultation?

If a customer/partner/stakeholder contacts you with a question relating to the consultation, please forward this to strategichousing@stockton.gov.uk

If a customer queries their current housing application, who do I direct them to?

If a customer contacts you with an issue relating to their Tees Valley Home-Finder account, please forward this to the Lettings and Nominations team.

Email: tvlp@stockton.gov.uk

Telephone: 01642 524345



Appendix A

Common Allocation Policy Review 2024 Consultation Questions

Question One

Please select which option best represents you:

- o I am a resident living within the Tees Valley Home-Finder partnership area.
- o I am a staff member of a Tees Valley Home-Finder Partnership organisation.
- o I am a representative of the Registered Provider sector.
- o I am a representative of the VCSE Sector
- Other (e.g. an advocate acting behalf of an applicant)

(To appear when options 2,3 or 4 are selected above)
Please state the name of the organisation you are completing the consultation on behalf of:
Open text box restricted to 30 characters

Do you currently have a Live Tees Valley Home-Finder account application?

- o Yes
- o No



Question Two

Local Connection

Currently applicants do not need a local connection to register an account on Tees Valley Home-Finder and bid for housing within the partnership area. However, priority for housing is given to those with a local connection.

The Proposal

Considering the current significant demand for housing and an increase in applications from outside the partnership area, it is proposed that a local connection is required in order for an applicant to register and apply for housing via Tees Valley Home Finder across the three Local Authority partnership areas.

Applicants will be counted as having a local connection to a Local Authority area if they fit one or more of the following categories:

- 1. They live in the Local Authority area and have lived there for 6 out of the past 12 months or 3 out of the past 5 years*
- 2. They have close family connections with someone who has been resident in the Local Authority area for a minimum of five years. A close family connection is defined as a parent, child, grandparent, grandchild, sibling, legal guardian; or
- 3. Their regular place of work is located within any of the Local Authority areas.

*Exclusions would apply to accommodation that an individual may have been directed to reside such as Approved Premises, Prison and Bail Hostels. It also would not include Care Homes and Hospitals.

Applicants leaving the armed forces and victims of domestic abuse will not need to have a local connection. Divorced or separated spouses or civil partners of Service personnel who need to move out of accommodation provided by the Ministry of Defence will also be exempted from local connection requirements. A local connection will be applied across all 3 Local Authorities areas for these applicants.

Applicants eligible under the Homes for Ukraine scheme will have local connection to the Local Authority of the host family that they were placed with.

- I Strongly Agree
- o I Agree
- I Neither Agree/Disagree
- I Disagree
- o I Strongly Disagree



Question Three

Anti-Social Behaviour

The current policy states the following in relation to anti-social behaviour:

If the applicant (or a member of their household) is found to be guilty of 'unacceptable' behaviour (which includes a history of anti-social behaviour), they may be excluded from the partnership housing register for **12 months.**

The Proposal

Due to the increase of anti-social behaviour and the impact this has on communities it is proposed that this timeframe is extended to **36 months**. This will impact individuals who have been served notice, evicted or had a property closure due to anti-social behaviour only.

- I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- I Disagree
- o I Strongly Disagree



Question Four

Priority Bidding

The current policy states the following in relation to keeping the partnership register up to date:

Applicants with a priority for housing will be reviewed regularly to ensure they are not having difficulties with the scheme and to check that they are applying for suitable properties as they come up.

The Proposal

Customers who are in Bands 1, 2 and 3 will be expected to bid for suitable properties using the priority awarded to them. Applicants who do not bid **may** have their priority removed if there have been suitable properties advertised and they have failed to place bids on them.

- o I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Five

Band One Plus Demolition or Regeneration

Currently people living in the partnership area who are losing their home due to demolition or regeneration are allocated Band One housing priority in the area which they live.

The Proposal

It is proposed that a new Band One Plus banding is created and those customers who are losing their home due to demolition or regeneration would be provided with the higher priority banding.

- o I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Six

HM Armed Forces Community

The current policy states:

People leaving the HM Armed Forces community. This will include a member of the Armed Forces (serving or has formerly served in the regular forces; serving or has formerly served in the reserved forces; a bereaved spouse/civil partner; divorced spouse/civil partner*) are allocated Band One Priority.

Applicants will need to be assessed by the Local Authority Homelessness Teams before this priority will be awarded.

The Proposal

It is proposed that a new Band One Plus banding is created and those customers leaving the armed forces community (serving or has formerly served in the regular forces; serving or has formerly served in the reserved forces; a bereaved spouse/civil partner; divorced spouse/civil partner*) with an **urgent need** for housing would be provided with the higher priority banding. Applicants will need to be assessed by the Local Authority Homelessness Teams before this priority will be awarded.

And:

Those leaving the Armed Forces community (serving or has formerly served in the regular forces; serving or has formerly served in the reserved forces; a bereaved spouse/civil partner; divorced spouse/civil partner*) within the last five years with **no** urgent housing need will be allocated Band Three Priority on their **first tenancy only**.

* For this purpose, "the regular forces" and "the reserve forces" have the meanings given by section 374 of the Armed Forces Act 2006(2).".

- I Strongly Agree
- I Agree
- I Neither Agree/Disagree
- I Disagree
- I Strongly Disagree



Question Seven

Homelessness

The current Policy States that homelessness applicants are awarded Band One housing regardless of their assessed priority need:

People assessed as statutorily homeless and in priority need

People who have been accepted as statutorily homeless and in priority need and where the main homeless duty is owed (Part 7 of the Housing Act 1996). People in this category may receive a direct offer of housing.

Applicants will need to be assessed by the Local Authority Homelessness Teams before this priority will be awarded.

Applicants who, following assessment, are owed the homelessness prevention or relief duty. *

* If duty has been discharged through the refusal of a reasonable offer of accommodation, the applicant will be placed into Band 4. If the duty is discharged for any other reason, the applicant will be placed into the Band appropriate to their assessed housing needs.

Applicants will need to be assessed by the Local Authority Homelessness Teams before this priority will be awarded.

The Proposal

It is proposed that homelessness applicants following assessment by the Local Authority Homelessness Teams would be split across **three** priority bands.

Band One Priority would be allocated only to those applicants who are homeless living in temporary accommodation arranged by one of the partner Local Authorities, or are owed a main or relief duty and are in priority need as in accordance with Homelessness Reduction Act 2017 (the homelessness legislation) and there is an urgent need to free up the temporary accommodation, or move in order to fulfil the above duties.

Band Two Priority would be allocated to those applicants who, following a homeless assessment are owed a prevention or relief duty with no priority need.

Band Three Priority would be allocated to those applicants where a relief duty has ended after 56 days, and it has been determined the applicant has been deemed to be intentionally homeless.

- I Strongly Agree
- I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Eight

Young People Leaving the Care of the Local Authority

The current policy states

As defined in the Children Act 1989, where a formal referral has been made by Social Services with the aim of safeguarding the welfare of the child or children or a child/children leaving the care of the Local Authority under the Children (Leaving Care) Act 2000 are awarded Band Two housing priority.

The Proposal

An individual leaving the care of the Local Authority under the Children (Leaving Care) Act 2000 who have been assessed as ready for independent living will be awarded Band One Priority.

And:

Those individuals who do not qualify for Band One Priority would be awarded Band Two Priority for their first tenancy only.

- I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Nine

Medical Grounds

The current policy states

Applicants who have been assessed by one of the Partners as requiring alternative accommodation because their medical condition (physical or mental health) and/or disability is having a significantly detrimental effect on their ability to live in their current home.

Applicants will be referred to the relevant Local Authority Team for assessment by an Occupational Therapist before any Band award is made under this category.

Currently applicants assessed under the category of Urgent Medical are awarded Band Two Priority.

The Proposal

It is proposed that a new category of Emergency Medical Grounds is created and applicants who are assessed as requiring emergency accommodation are allocated Band One Priority.

This banding will only be allocated to those individuals with an emergency housing need due to medical problems which are exacerbated by their current housing situation, and applicants being discharged from hospital where their housing is unsuitable and cannot be made suitable through adaptations. Other urgent medical cases will remain in Band Two.

Each case will be assessed individually, and applicants will be referred to the relevant Local Authority Team for assessment by an Occupational Therapist or Secondary Mental Health Service before any Band award is made under this category. The assessment is not of the applicant's health but how their accommodation affects their health or welfare therefore the impact of the property will be assessed and not the prognosis of the illness.

- I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- I Strongly Disagree



Question Ten

Child Protection

Currently only applications with a "child in need" are allocated priority housing at Band Two.

The current policy states:

As defined in the Children Act 1989, where a formal referral has been made by Social Services with the aim of safeguarding the welfare of the child or children.

The Proposal.

A new category of Child Protection will be introduced as a Band One Priority. This will be allocated where there is evidence of a **serious threat** to the well-being of a child and their accommodation is a **significant** contributory factor to the risk. Referrals will be made by allocated Social Worker's only.

The child in need Band Two Priority will remain and allocated to those assessed where the accommodation is being a key factor to the risk of the child.

- o I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Eleven

Special Guardianship Order

The current Policy States

Adoptive parents or prospective adoptive parents/foster carers

Those who need to move due to their current accommodation being unsuitable or who need to move to a different location to safeguard or promote the well-being of the child or children they have adopted or are planning to adopt or foster children in foster care.

Applicants will be required to provide documentation from the Local Authority to confirm their adoptive/foster carer status before any Band award is made under this category.

Applicants assessed under this category are awarded Band Two Priority.

The Proposal

It is proposed that Special Guardianship a family court order that places a child or young person in long-term care with someone other than their parent(s) (Adoption and Children Act 2002) is also included within this category.

- I Strongly Agree
- o I Agree
- o I Neither Agree/Disagree
- o I Disagree
- o I Strongly Disagree



Question Twelve

Acute Overcrowding

The current policy states people living in overcrowded conditions are awarded Band Three Priority Banding.

Overcrowding is assessed on the number of people within the household and according to the best use of bedrooms and sleeping spaces available. The calculation shown below is used to determine overcrowding.

Under-occupation and overcrowding will be assessed based upon the number of people within the household and according to best use of the bedrooms to reflect the criteria set out by the Department of Work and Pensions.

One bedroom will be considered suitable for:

- An Adult /Adult Couple.
- Two children of the same sex under the age of 16.
- Two children under the age of 10 regardless of their sex.
- Any other person aged 16 or over; or
- Any other child that cannot be matched with the above.

Please note: This assessment does not include living room space unless there is a second living room which can be used as a bedroom, and it does not breach health and safety standards. Where a bedroom is being used for another purpose e.g., study or toy room, its original function as a bedroom will be used in assessing the level of under occupation or overcrowding. The main householder(s) will be expected to share a bedroom with a child under the age of 12 months.

Additional Bedrooms

There may be some circumstances where a household is allowed an extra bedroom as detailed below:

- Health reasons.
- Bedroom for an overnight carer.
- Joint custody or overnight access to a child/children; or
- Prospective adopters and foster carers.

Where one of the above applies, evidence will be requested, and an affordability check may need to be completed to make sure the applicant can afford the additional bedroom.

The Proposal

It is proposed that a new category of Acute Overcrowding is introduced and awarded Band Two priority. This category will be awarded where an applicant household is severely overcrowded requiring two or more additional bedrooms according to the criteria set out by the Department of Works and Pensions stated above. Other cases of overcrowding will remain in Band Three.

- I Strongly Agree
- I Agree
- o I Neither Agree/Disagree
- o I Disagree
- I Strongly Disagree



Question Thirteen

Senior Management Discretion

This category applies to Stockton Borough Council and Middlesbrough Council only.

There is no current policy which allows for senior management discretion.

The Proposal

Both Stockton and Middlesbrough Local Authorities expect that the vast majority of allocations will be made following the allocations scheme rules according to priority banding. However, there may be exceptional circumstances where the only way an **exceptionally urgent** housing need can be resolved is using senior management discretion. It is important, in fairness to all applicants that these discretionary powers are used in genuinely exceptional cases for example witness protection cases.

Within the Boroughs of Middlesbrough and Stockton these cases will be reviewed on an individual basis by the Local Authority, Housing Service/Team (TBC) and a priority banding may be awarded.

Within the Borough of Redcar and Cleveland there is a quota system in operation, which ensures that a proportion of lettings is made available to applicants within each band. Therefore, the category of Manager's Discretion is not applicable in Redcar and Cleveland.

- I Strongly Agree
- I Agree
- o I Neither Agree/Disagree
- o I Disagree
- I Strongly Disagree



Question Fourteen

Any further comments

If you have any further comments regarding the consultation and the proposals, please detail them in the box below.

Please do not provide any comments on individual circumstances or provide any personal information.

Free text box, restricted to 100 characters.	

If you have any concerns regarding a current live application on Tees Valley Home Finder, please direct these to the Partner Agency who manages your application.

Contact details for the Tees Valley Letting Partnership are:

Partner Agency	Email	Telephone
Stockton Borough Council	tvlp@stockton.gov.uk	01642 524345
Middlesbrough Council	tvlp@stockton.gov.uk	01642 524345
Redcar & Cleveland Council	housingclientservices@redcar- cleveland.gov.uk	01642 774774
North Star Housing	customerservices@northstarhg.co.uk	0300 0110011
Beyond Housing	enquiries@beyondhousing.co.uk	0345 0655656



Rt Hon Angela Rayner MP

Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government 2 Marsham Street London SW1P 4DF

To: Local Authority Leaders in England

Cc: Local Authority Chief Executives in England

National Housing Federation

G15

Northern Housing Consortium

1 October 2024

Dear Leader,

The Government is committed to the biggest increase in social and affordable housebuilding in a generation. Our aspiration is to ensure that, in the first full financial year of this Parliament (2025-26), the number of Social Rent homes is rising rather than falling. We are working closely with you to deliver this.

I announced a set of measures in my statement to Parliament on 30th July, including a consultation on the National Planning Policy Framework, greater flexibilities in the Affordable Homes Programme, and flexibilities on the use of Right to Buy receipts. We have welcomed engagement following this and are committed to setting out details of future Government investment in social and affordable housing at the Spending Review.

Support for our Armed Forces communities

The Government is committed to strengthening support for our Armed Forces communities and to ensuring that veterans have access to the housing support that they need.

We recognise the value of the social housing allocation framework in providing vital flexibilities for councils to design and operate local allocation policies that best reflect local needs. This includes the use of local connection and residency tests to ensure the allocation of social housing can better meet the needs of local communities. However, we believe, and the guidance makes clear, exceptions to this framework should apply in special circumstances. We know that councils use the flexibilities available to them but we must ensure that no veteran is unfairly penalised.

The Prime Minister has announced an ambition to house all veterans in housing need.

We will be bringing forward changes to social housing allocations regulations to exempt all veterans from local connection and residency tests to facilitate their access to social housing.

Existing guidance, <u>Improving access to social housing for members of the Armed Forces</u> includes examples of ways in which councils can ensure that Service personnel and their families are given appropriate priority for social housing, such as setting aside a proportion of properties for former

members of the Armed Forces under a local lettings policy. This might be particularly relevant where the council or housing association partners are bringing new developments on stream.

In addition to the examples set out in the guidance, councils are also able to offer Temporary Accommodation support for veterans under the existing parameters of the third round of the Local Authority Housing Fund. Councils are able to deliver smaller Temporary Accommodation units by agreement where there is a local need and can already take into account an individual's military service when assessing housing needs and priority.

Exemptions from local connection requirements for domestic abuse victims and young care leavers

This Government understands the important role social housing can play in supporting some of the most vulnerable in society and we want to ensure that the system works for these individuals. We know that every year tens of thousands of vulnerable households are given the shelter and security that social housing provides, with local councils and housing providers playing a key role.

In our response to the consultation on <u>social housing allocations</u> reforms, published earlier this month, we committed "to ensuring that, where appropriate, barriers preventing vulnerable groups in need from accessing social housing are removed. We will continue to work with councils, partners and other stakeholders to support vulnerable groups, including victims of domestic abuse and care leavers".

We know that care leavers and domestic abuse victims can have difficulty demonstrating a local connection. Such individuals often have to leave their local area for their own safety or to receive suitable support and do not have a local connection to the place where they would best be able build a safe and stable life.

The Prime Minister announced that the Government will better support young care leavers and victims of domestic abuse to access housing.

We will exempt care leavers under 25 and victims of domestic abuse from local connection and residency tests. We will convene roundtables with stakeholders to explore the detail of these exemptions further and consider what more needs to be done to support vulnerable cohorts.

Existing guidance, <u>Improving access to social housing for victims of domestic abuse</u>, is intended to assist local councils to ensure that victims of domestic abuse are able to move into social housing from a refuge or other form of temporary accommodation by ensuring that they have appropriate priority and are not disadvantaged.

Improving decency standards

On 22 September I set out the government's commitment to take action to ensure all homes are decent and safe, and residents are treated with the respect they deserve. I will work in partnership with the sector to deliver the change needed. We will:

- consult on a new Decent Homes Standard for the rented sectors as soon as possible. The consultation will look to ensure safe, secure housing is the standard people can expect in both social housing and private rented properties.
- bring forward legislation for Awaab's Law in the social rented sector this autumn, so hazards such as damp and mould must be investigated and remedied to set timescales. Implementing this legislation for social housing and extending protections to the private rented sector will support tenants to secure faster repairs, reducing health and safety risks.
- introduce new access to information requirements for housing associations, to enable tenants from the 2.5 million households managed by housing associations to hold their landlords to account and drive up the quality of the housing and services they provide.
- introduce a Competence and Conduct standard for the social rented sector that will ensure staff have the right skills, behaviours and experience to carry out their roles, which often involve supporting some of the most vulnerable in our society. The new standard, which will include qualification requirements for senior managers and executives, will help to raise standards across the sector, ensuring tenants receive a professional service and are treated with respect and dignity.
- consult on a Minimum Energy Efficiency Standard of EPC C for the Social Rented Sector by the end of the year. This will mean that social housing residents will benefit from cheaper bills and have homes that are less susceptible to damp and mould.

The Housing Minister and I will also continue to work with you to deliver affordable homes to meet the needs of veterans and vulnerable groups as part of our broader commitment to deliver a generational boost in social and affordable housing and the development of our 10-year housing strategy.

Yours sincerely,

RT HON ANGELA RAYNER MP

Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government