

District Heating Annual Report 2022

Date: 23rd November 2022

Report of: Director of Resources

Report to: Executive Board

Will the decision be open for call in? Yes No

Does the report contain confidential or exempt information? Yes No

Brief summary

Leeds PIPES is now a well-established low carbon heat utility, with a rapidly growing customer base and several extensions due for construction during 2022/23. Leeds PIPES has collected four awards this year, demonstrating both innovation and a focus on meeting customers' needs.

External factors, particularly the gas price volatility and institutional investors' focus on carbon, mean that Leeds PIPES now has an even more compelling commercial offer. The network is extremely reliable and has proved that the built-in resilience works well to ensure that customers have the heat that they need, when they need it, at the right price.

This report reviews operational and financial performance over the last year and forecasts key activities and anticipated performance for the short term. It also considers the impact of global gas price increases on our pricing strategy for current and future customers and outlines the likely impact of key forthcoming legislation.

The report seeks decisions from Executive Board that will help the network to keep growing and to keep providing an excellent service to our customers.

Recommendations

Executive Board is requested to:

- a) Agree to offer the proposed changes to heat tariff indexation set out in confidential appendix 1, to deal with the ongoing global spikes in gas prices.
- b) To commit £840k of Housing Revenue Account (HRA) budget to secure the district heating connection to the Lovells in anticipation of securing Social Housing Decarbonisation and Home Upgrade Grant Funding as match funding
- c) To support the proposal to seek accreditation from the Heat Trust for the Leeds PIPES network by summer 2023 to help prepare for future heat network regulation.

- d) To note the financial performance of the network and acknowledge that the Director of Resources will continue to have delegated authority to take operational decisions to optimise commercial performance and will report this annually to Executive Board.

What is this report about?

- 1 The Leeds PIPES district heating network is now well established in Leeds with our progress being recognised nationally with prestigious awards from the Association of Decentralised Energy. This report provides Executive Board members with a progress update and looks ahead to the future. Specifically, the report:
 - a) Provides an update on performance of the Leeds PIPES network during 2021-22 including key information on how the network has grown and attracted new customers.
 - b) Identifies key planned developments for 2022-23, including the phase 3 extensions and likely new customers.
 - c) Provides a summary of the financial performance of Leeds PIPES during 2021-22 and forecasts financial performance for the next 3 years.
 - d) Considers the impact of the global spike in gas prices on the heat tariffs offered to current and prospective customers.
 - e) Outlines the likely impact of key forthcoming legislation on Leeds PIPES, particularly Heat Network Zoning and Heat Network Regulation

What impact will this proposal have?

- 2 This section will address each of the 5 areas identified above in turn.

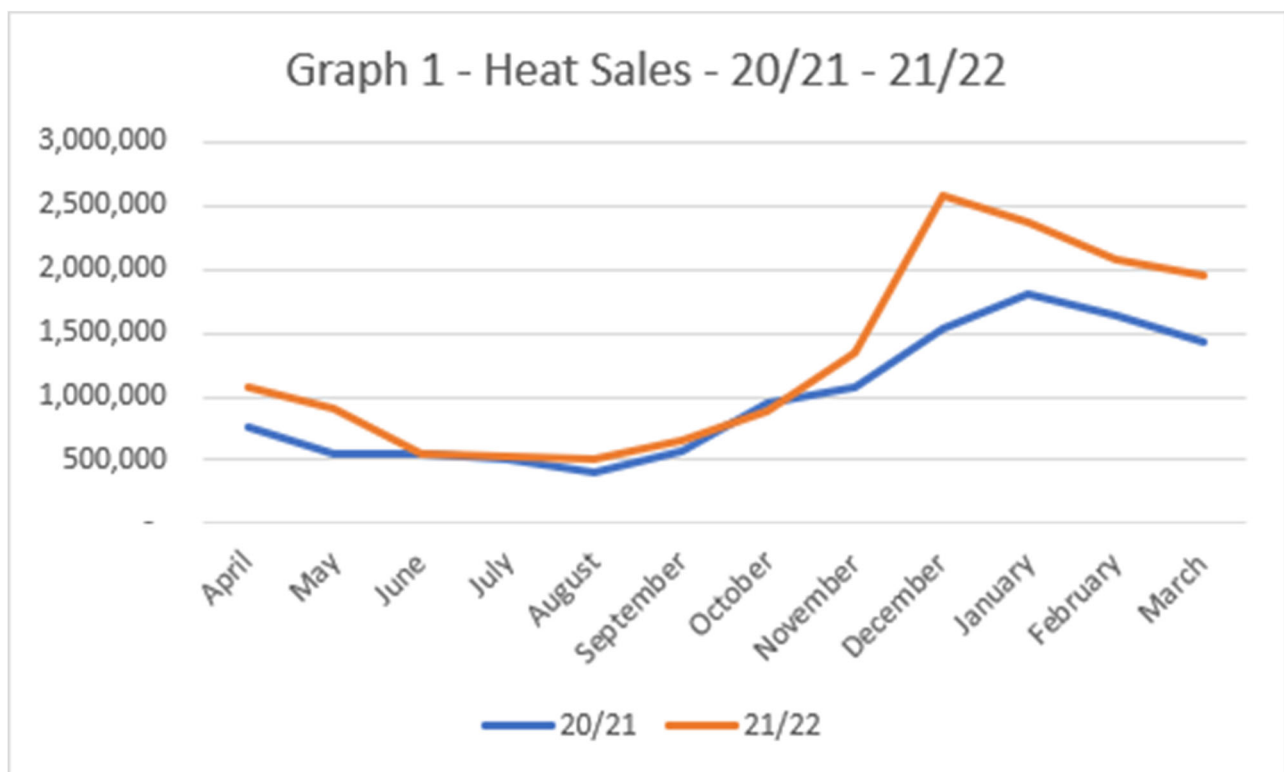
Update on Leeds PIPES operational performance during 2021-22

- 3 The Leeds PIPES district heating network continues to be a strategic priority for the council, with investment into the network approved at Executive Board meetings in 2017, 2019, 2020, and most recently in February 2022. Phase 1 was completed during 2019, with Phase 2 completing in 2020, and Phase 3 has now commenced construction. The Recycling and Energy Recovery Facility (RERF) now provides low carbon heat to council tenants in Multi-Storey Flats (MSFs), commercial customers, and the council's own buildings in the Civic Quarter of the city.
- 4 Critically, the network has been extremely reliable since operations commenced, with no loss of heat to customers at any point. Whenever the RERF has had outages, the back-up boilers at Saxton Gardens have automatically fired to ensure uninterrupted service is provided to customers. The network is still in the initial operational period and although there have been some teething problems, these are being resolved as they occur and have not impacted on service delivery. The operational team at Vital Energi is now focussing proactively on operational aspects, including in partnership with Veolia as heat supplier, to improve the efficiency of the network as the operations bed in and we have more data to refine operations.
- 5 The high quality of the network has been recognised nationally with Leeds PIPES being awarded several prizes this year, notably the Association of Decentralised Energy's prestigious *Heat and Efficiency: Operational* award and the *Special Award for Contribution to Net Zero*; the network also secured two awards at the Heating & Ventilation News Awards 2021: *District Heating Project of the Year* and *HVAC Project of the Year (Over £0.5m)*. Leeds PIPES is seen by many as a model for what forward thinking local authorities can achieve in this space and we regularly support other authorities to develop district heating projects and host visits to our network, including from other local authorities and institutions such as the UK Investment Bank.

6 The network has experience strong growth since it became operational, with key metrics shown in table 1 below. We have already made 6 new non-domestic connections during 22/23 and table 1 forecasts key network metrics for 2022/23. Notably, the monthly peak heat sales in 2021/22 is approximately 600MWh higher than the peak for 2020/21, shown in graph 1 below.

	2020/21	2021/22	2022/23 (forecast)
Heat supplied to customers (MWh)	11,757	15,454	24,000
Number of non-domestic customers	1	4	12
Number of domestic customers	c1600	c1700	c1800
Percentage of heat supplied by the RERF	89%	96%	c93%
Percentage of available heat from the RERF used	c9.5%	c12.3%	c16.8%
CO ₂ reduction (tonnes)	1,666	2,254	4,425

Table 1



Graph 1 – Heat Sales on the network, in kWh, in 21/22 and 21/22 financial years.

7 Leeds PIPES' growth has also enabled city partners to access very significant levels of Public Sector Decarbonisation Scheme funding, supporting capital investment in both a district heating connection and additional energy saving measures that will save energy, money and CO₂ whilst supporting local employment. Public sector partners including the Department of Work and Pensions, Leeds Beckett University, the Ministry of Justice and St James' Hospital have collectively been awarded over £12m thanks to the ability to connect to district heating. The council has secured over £5m of investment to connect the Town Hall, Civic Hall, City Museum, Art Gallery and Library, together with associated improvements to the heating systems, LED lighting upgrades in the Museum and Civic Hall, glazing improvements in the Town Hall and

draft proofing in Civic Hall. Without our original investment in district heating, none of these buildings would have been eligible for the funding support.

- 8 The rapid expansion of the network will continue during 2022/23 following the February 2022 Executive Board approval to proceed with the Phase 3. A brief update on Phase 3 construction progress is outlined at paragraph 12.
- 9 Phases 1 and 2 of the network have been designed to facilitate connections for public sector organisations and council buildings. The next phase of works is a significant development for the council in that we expect to connect primarily private non-domestic customers onto the network. This will raise the profile of the network in the city, and further prove the viability of DHN connections for non-domestic customers, demonstrating its benefits as the council looks to continue its expansion in future phases of works in the coming years.
- 10 The council is in contract to connect three large public sector customers in 2022/23, representing a dozen new building connections, and we are supporting two more partners to apply for Public Sector Decarbonisation Scheme funding in October. We are in advanced commercial negotiations with five customers, further details of which is included in confidential appendix 1, and are making good progress with a further fourteen potential customers. New potential customers regularly contact the project team to discuss connecting to the network, and we now have a smooth process to provide technical and commercial details. As many connections are new developments there are often protracted timescales from first enquiry, but our persistence and the maintenance of good relationships is now leading to contracts being signed.
- 11 This strong pipeline of interest means that the council is confident that further connections will continually be made in the coming years, particularly in the current context of volatility in the energy market, with the PIPES network offering a cheaper, reliable, low carbon alternative for heating compared to conventional gas and newer forms of heating such as heat pumps which rely on electricity.

Key planned activities for 2022-23

Phase 3 extension

- 12 In February 2022 Executive Board approved the injection of £7.2m into the PIPES capital programme to deliver the Phase 3 extension of the network, subject to Heat Networks Investment Project (HNIP) funding being secured.
- 13 Since then, a formal grant funding agreement has been issued and signed by HNIP and the council and on this basis, the NEC3 construction contract has been awarded to Vital Energi, the council's principal contractor for the construction, operation and maintenance of the network. A separate contract has also been awarded to Arup to provide NEC3 Project Manager services to the council during Phase 3 construction.
- 14 The PIPES project team and the council's Highways team have been working closely with Vital Energi in advance of works starting on site, to ensure appropriate coordination between this work and wider improvements being made on the highway network in the city, and to secure permits for partial or full closures of roads. It is inevitable that some disruption will occur when installing DH in the highway, but these coordination meetings ensure that this is minimised.
- 15 The Phase 3 extension is split across five different zones. Detail on the zones along with the programmed start and finish dates for the works in each is provided in the table below.

Zone	Location	Start on site date	Completion date
1	Rossington Street to Woodhouse Lane junction	January 23	March 23
2	Bridge Street to Skinner Lane	September 22	November 22
2a	Skinner Lane to Lovell Park Hill	Tbc	Tbc
3	Westgate to York Place	November 22	March 23
4	CITU Site	October 22	February 23
5	Beckett St to St James Hospital Energy centre	December 22	March 23

16 The council has recently concluded an options appraisal regarding the most appropriate heating source for the Lovell Park multi-storey flats. This has concluded that district heating provides a sizable capital saving vs air source heat pumps, together with an ongoing revenue saving to the HRA. The cost and service level provided to tenants is the same under both options. The council is therefore proposing to apply for Social Housing Decarbonisation Funding to support the district heating connection, utilising SHDF funding.

17 In addition to the main extension of the spine network, construction work to connect the Combined and Magistrates' Courts in the centre of Leeds is due to commence in September with a completion date for works of March 23.

South Bank study

18 A long-held ambition for the PIPES project is to extend into the South Bank area of the city, to capitalise on the pipeline of major developments planned to come forward as the regeneration in the area continues. The council has previously had positive discussions with stakeholders in the area, regarding the potential to connect into a district heating network.

19 A 2021 feasibility study into bringing district heating to this area of the city put forward options for how to achieve this, including the construction of a standalone heat network with potential to interconnect with the main PIPES network at the stage the network reaches this area of the city.

20 In early 2022 the council was successful in receiving funding from the Heat Networks Delivery Unit (HNDU) within the Department for Business, Energy and Industrial Strategy (BEIS), a body set up by government to provide grant funding and guidance to local authorities for heat-network associated feasibility and project development work.

21 The funding award is for a detailed techno-economic feasibility (TEF) study which evaluates the options for establishing a standalone heat network in South Bank, together with future interconnection options, and how best to establish the network commercially.

22 Following a tender process, Aecom Ltd were appointed in July 2022 to deliver the study, with a completion date of January 2023. The study will set out the recommended option and a programme of next steps for taking the project forward. The study will be the basis for an expected Green Heat Network funding application in 2023 to enable delivery of the works.

Financial performance of Leeds PIPES during 2021-22 and 3-year forecasts

23 The 2021/22 financial year has been challenging, with unexpectedly high inflation linked to rapidly escalating utility costs, both of which negatively impact on the district heating network, through increased operation and maintenance costs and higher gas costs for the c5% of gas used on the network. However, the higher utility costs also link through to a higher than anticipated heat sales incomes, albeit with a time lag. These macroeconomic factors will influence financial performance in 2022/23 and most likely for subsequent financial years.

Leeds District Heating PipeCo Ltd (Special Purpose Vehicle)

24 The Company has made an operating loss of £83k in the second year of trading (21/22) against a budgeted loss of £110k. This was chiefly due to the savings on the expected amount accrued for Business Rates. This loss has been appropriated to the profit and loss (P&L) reserve on the balance sheet. The early years of the company are modelled to produce modest losses. Savings from the government decision to exempt district heating networks from Business Rates will reduce this loss and allow for a reassessment of the current officer costs of supporting the company. The forecast for the next three years is therefore expected to be approximately consistent with the 21/22 year.

Leeds Pipes – General Fund

25 General fund activity in 21/22 produced a £58k surplus against a budgeted deficit of £177k. Again, this was chiefly due to the savings on the expected amount accrued for Business Rates. The exemption of district heating networks from Business Rates will result in savings of approximately £230k per annum which will contribute to the authority's financial challenge in future years. Therefore, pending any decisions from this report, the current model is forecasting a continued budget deficit of approximately £180k over the coming 3 years.

Review of tariffs

26 Leeds PIPES was established at a time when gas was the dominant heating fuel and when gas prices had been low and stable for both domestic and commercial customers for over a decade.

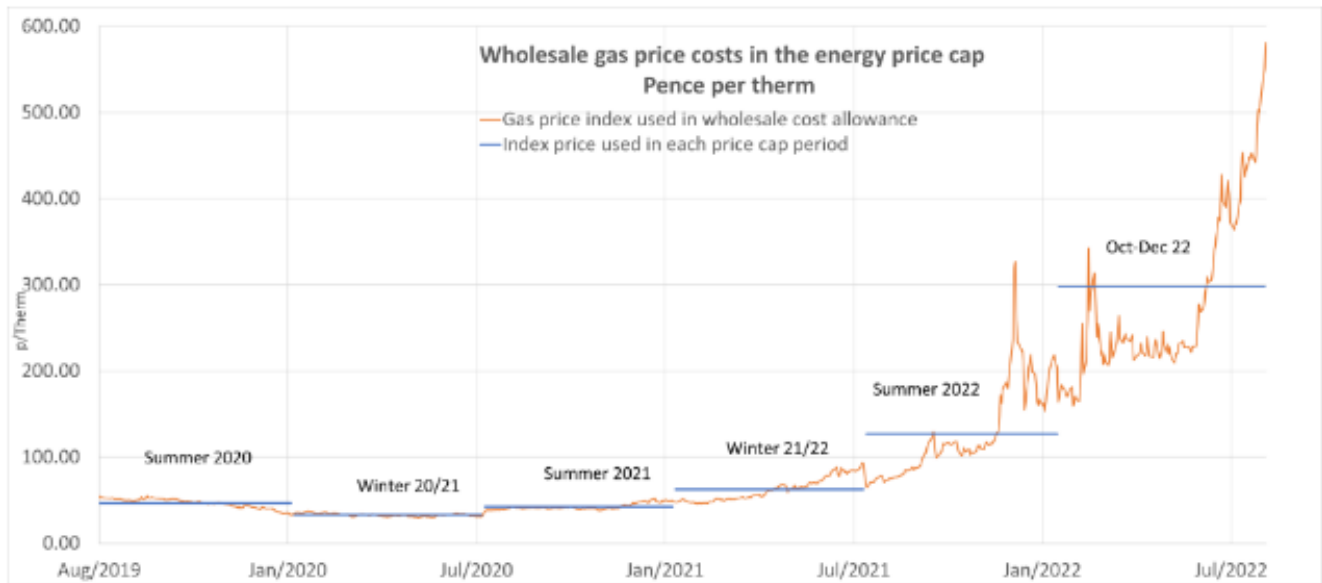
27 We therefore priced our offer to be competitive against a gas counterfactual, indexed using a blend of RPIx and gas indices.

28 Two factors are now challenging this position:

- a) The pandemic saw utility prices drop, but economic rebound combined with the war in Ukraine and other global factors has seen a sustained spike in utility prices, with no end in sight.
- b) The majority of new buildings and many existing buildings now have electric heat pumps as the counterfactual.

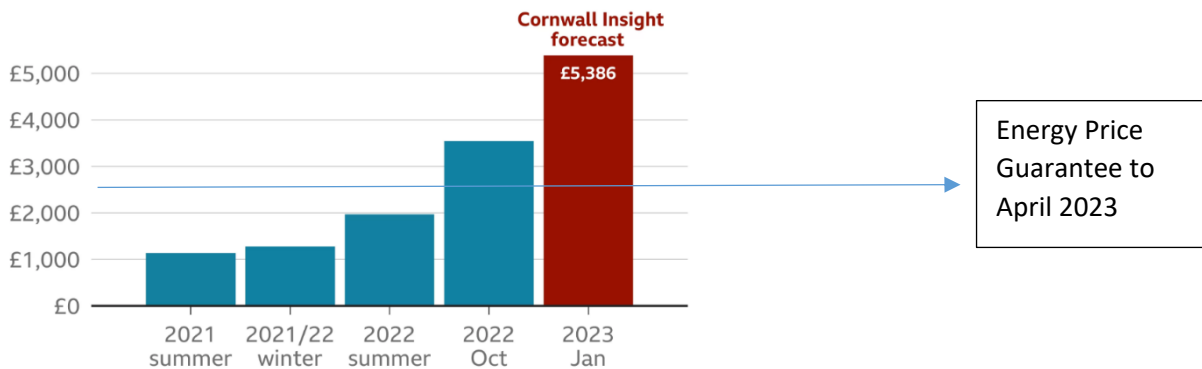
29 The graphs below show how wholesale gas prices have risen and the overall (gas and electricity) price caps, including a projection for Jan 2023.

Wholesale gas price costs in the energy price cap Pence per therm



Energy price cap forecast to rise to £5,386

Annual bill for a typical household on a price capped dual-fuel tariff paying by direct debit



Source: Ofgem/Cornwall Insight, 26 Aug

BBC

- 30 These two factors mean that we should consider whether our current approach is the right one for existing customers, those at Head of Terms stage or new customers, or whether it should be updated.
- 31 The council has prepared a range of potential options (including changing the indexation method to include a stronger link to RPIx than gas indexes, introducing caps and collars and do nothing scenarios) then has tested the impact on customers and the council's financial model to ensure that any changes both support customers through the current price volatility and are fair over the longer term. The recent unexpected energy volatility and resultant inflationary pressures show that we cannot forecast a precise future, so we have modelled a range of plausible indexation scenarios. Due to the commercial sensitivity of this proposal, the details are contained in Confidential Appendix 1. It should be noted that although we are proposing to offer alternative pricing options to customers that if we are already in contract, a customer can choose to remain on their pre-agreed indexation methodology.

Review of forthcoming legislation

- 32 The recently amended Climate Change Act, with its revised target of net zero carbon emissions across the UK by 2050, is likely to drive significant change in policy in the next few years. In relation to this target the Government has also set out significant policy commitments to drive the decarbonisation of the UK economy, notably to significantly decarbonise heat partly through the development of heat networks throughout the UK.
- 33 In 2019, the Committee on Climate Change (CCC) published the document Net Zero – The UK’s contribution to stopping global warming. The CCC have estimated that around 18% of UK heat will need to be met via heat networks if the UK is to comply with its carbon targets cost effectively.
- 34 As a response to this, the government is developing two new interrelated policies: *Heat Network Zoning* and *Heat Network Regulation*. Both have recently published consultation responses, having engaged extensively and effectively with the heat network industry, including Leeds and other large public sector network operators.
- 35 The **Heat Network Zoning Policy** is based on the policy established in Denmark in the 1970s as a response to the fuel crisis, which has successfully driven low carbon heat networks throughout the country. It will operate by designating areas within cities where buildings (and potentially heat sources) are mandated to connect to networks, unless exempt, enabling the expansion of networks where they are recognised to be the lowest cost way to decarbonise heat. The Government has committed to introduce this policy by 2025. Key points include:
- a) Local authorities will be Zoning Coordinators and will be provided with support and funding to set local DH Zones.
 - b) Local authorities can then choose how to operate the zones, including developing networks themselves, contracting with third parties to operate in part or all of the zone or leaving it to the market.
 - c) Networks will be regulated by the forthcoming DH Regulation legislation.
- 36 Leeds has been participating in two BEIS sponsored Zoning pilots during 2022. These have sought to test practical elements of the Zoning process (including data collection, modelling, zoning establishment, etc) using our experience to identify potential flaws and barriers. They have also worked through the process in detail, identifying the most suitable responsible party for the various tasks and approximating time taken and costs.
- 37 We believe that the Zoning policy has the potential to increase heat network take up exponentially, by removing the biggest barrier to initial establishment and strategic growth: uncertainty. By mandating certain buildings and developments to connect, we can plan the growth of the network strategically, rather than having to size extensions for particular developments where conversations have progressed, we can identify whole neighbourhoods and plan to connect over the long term. This policy would also allow us to coordinate works on the highways better: DH mains could be installed as part of any major highway works in areas that we plan to extend to in future, to significantly reduce costs and disruption.
- 38 This is all reliant however on very significant investment in DH infrastructure ahead of demand, so we are in conversation with government about how to finance this, with our preference being for a combination of grant and loan, with the loan not being repayable until a threshold of heat supply, and income, has been reached.
- 39 Government have announced plans to introduce a new DH Regulator, also by 2025. District Heating is currently unregulated, with voluntary codes of practice and standards used by the better networks, but no obligation to use these for privately funded networks. This means there is significant variation in the customer service standards provided to customers and in the cost

of heat. DH is also not covered by price caps, so recent spikes in wholesale gas costs have been passed on in full to many customers across the UK where a DH network is more heavily reliant on gas than ours

- 40 Ofgem have been appointed as the Heat Network Regulator for Great Britain and will take on broad responsibilities include setting and enforcing regulatory requirements relating to the provision of information, pricing, technical standards and quality of service standards to protect domestic and microbusiness consumers. The Heat Network Regulator will also manage the heat supply authorisation process to enable heat sources to connect to networks.
- 41 Although the full details of the regulation are yet to be announced, it is widely anticipated that the good practice required by BEIS district heating grant funds (i.e. HNIP) will be used as the basis of the quality standards. Leeds PIPES has been built in compliance with the Chartered Institution of Building Services Engineers (CIBSE) Code of Practice (a technical standard) has recently adopted the HNIP developed legal documents and has been developed to meet the requirements of the Heat Trust (a customer service standard). However, we have not yet joined the Heat Trust but propose that now is the right time to formally join and seek agreement from Executive Board to this.
- 42 We will update Executive Board on these important policies as they develop.
- 43 The Leeds PIPES district heating network has considered equality, diversity, cohesion and integration issues throughout its development and so has already been screened for its impact. These screenings identified that the work creates an overwhelmingly positive impact, with residents and businesses connected to the network benefitting from more affordable heat and creating job opportunities for local residents. This report builds on previous decisions, with recommendation a) focussed on keeping the network affordable; b) spreading the benefit to additional customers and c) formalising the customer protection already built into our operations. Therefore a new screening is not required.

How does this proposal impact the three pillars of the Best City Ambition?

Health and Wellbeing

Inclusive Growth

Zero Carbon

- 44 The Leeds PIPES DHN uses very low carbon heat from the RERF for c95% of the heat supplied to customers so achieves significant savings against other heating fuels, particularly where it replaces gas. As the network grows, it becomes more efficient with improved steam to hot water conversion efficiencies and lower losses throughout the network. This will significantly decarbonise heat from all connected customers, with customers replacing gas boilers typically reducing heating and hot water emissions by c80%. Removing gas boilers from dense urban areas also has a positive impact on background air quality, with a positive impact on health.
- 45 As Leeds PIPES uses so little gas with the bulk of the heat from the RERF, the network is less exposed to energy volatility. This allows us to avoid the rapid escalation in heating costs that is pushing thousands more people into fuel poverty. This allows our customers to afford to heat their homes and business, improving health and wellbeing and supporting inclusive growth. The project also creates or secures significant numbers of short-term construction jobs when extensions are built or customers connected and now has a dedicated team of engineers to service and maintain the network.

What consultation and engagement has taken place?

Wards affected:

Have ward members been consulted?

Yes

No

- 46 Executive Board are regularly updated on the progress of the project and this report is a continuation of this.
- 47 The Executive Member for Climate and Infrastructure is regularly updated on the PIPES programme and is supportive of the continued development of the network.

What are the resource implications?

- 48 Construction of the DHN was approved on the basis that the council would attract additional customers to the network. The council will continue to add commercial connections to the network over the next phase of works, which helps to support the business case for the network in line with the council intention.
- 49 The injection of £7.188m into the capital programme to deliver the next phase of works was approved by Executive Board in February 2022. This was based on a detailed financial case brought to the Board.
- 50 Subsequent customer connections are paid for by the customer, either 100% up front, or split between a percentage paid up front, with a deferred percentage of the cost paid back over a fixed term through the standing charge.
- 51 The financial position of the network is a strong one currently as outlined at paragraphs 23-5, operating at a surplus in the 21/22 financial year.
- 52 The impact of the proposed changes to the heat tariff indexation are a key resource implication and these impacts on the financial position of the network are outlined in detail within the confidential appendix, but in summary, proposed changes to heat tariffs for customers noted in this report will make the network more attractive to customers, as we look to increase our competitiveness even further against the counterfactual of gas or electric heating.

What are the key risks and how are they being managed?

- 53 There is a risk that parallel to the phase 3 construction works, negotiations with customers stall or are ended without agreement, resulting in fewer than anticipated customers connecting to the network and impacting the financial forecasts outlined in this report. This risk is being mitigated through regular discussions with potential customers which are currently positive as outlined in more detail in confidential appendix 1.
- 54 An ongoing operational risk to the network is that a major fault at the RERF results in a lengthy interruption to heat supply. The network has full resilience provided by four 11MW gas boilers at Saxton Gardens Energy Centre so the impact on customers would be minimal. However, a lengthy interruption would mean operating on gas which is currently significantly more expensive than low carbon heat, with a major impact on the financial model. The council has therefore introduced a catastrophic failure clause within recent heat sales contracts to reduce the direct impact of this high impact but unlikely event on the council.
- 55 The impact of DHN works on highways networks across the city is closely monitored throughout all phases of work. The multi-disciplinary council project team and Vital Energi work closely to carefully plan and managed works to minimise disruption to the highways network, key stakeholders and city events.
- 56 Volatility in the utilities market is an ongoing risk but the detail outlined in confidential appendix is the proposed mitigation against this risk for both the council and DHN customers, protecting

customers from the worst of continually escalating prices whilst ensuring the financial position for the council remains positive.

What are the legal implications?

57 The information contained within confidential Appendix 1 to this report is designated as exempt from publication in accordance with paragraph 10.4(3) of the Access to Information Rules and Schedule 12A(3) of the Local Government Act 1972 on the grounds that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information). The confidential appendix includes commercially sensitive information regarding pricing structures for customers, and considerations of the impact of different options for revising tariffs on both customers and the council. Disclosure of this information could seriously harm the council's negotiating position when discussing heat sales with potential customers. Therefore, it is considered that the public interest in maintaining the content of confidential appendix 1 as exempt, outweighs the public interest in disclosing the information.

Updated Legal Agreements

58 The council undertakes detailed commercial negotiations with potential customers to agree payment terms, charges, and volumes of heat supply, initially through Heads of Terms and then formalised by a Heat Sales Agreement, created internally. However, these negotiations have taken significant effort and potential customers have noted the existing bespoke contracts as being barriers to connect.

59 With district heating networks expanding across the country in line with the UK's 2050 zero emissions targets, Lux Nova Partners have been commissioned by BEIS to develop a suite of template heat supply contracts to be used by any party involved in a district heating scheme, with the aim of standardising these types of contract across the market.

60 Going forward Leeds Pipes will use the Lux Nova templates as the foundation of its heat supply contracts. Addleshaw Goddard have therefore been appointed to import the essence of the previously used Heat Sales Agreement into the Lux Nova format. Critically, this work will ensure that there is appropriate flow down of risk from the new templates to the council's existing contracts with Vital Energi.

61 The Addleshaw Goddard commission will produce eight template agreements for the council to use as the basis for future developer and customer contracts. Depending on the scenario, the council can then select the appropriate template agreement, update to reflect the customer-specific terms and/or clauses, and promptly enter into contract.

62 We anticipate that this will speed up the process of signing customers up to connection agreements and long-term heat sales contracts.

Options, timescales and measuring success

What other options were considered?

63 The other option for the council with regard to the heat tariff indexation is to keep the indexation in line with the Heat Sales Agreements with each customer. However, we did not anticipate this level of gas price escalation, and hence escalation for customers, when we signed initial heat sales contracts. The preference is therefore to offer customers the chance to limit future price rises, in exchange for a floor price and inclusion of a catastrophic failure clause to reduce future council risk.

64 The other option for the council with regard to connection works, is to not proceed with extension works. This option has been discounted, as additional connections improve the

financial position of the project and therefore the council, in addition to contributing to the council's 2030 net-zero ambitions.

How will success be measured?

- 65 The main measure of success for the network is the volume of heat sold through the network, which improves the financial position and reduces CO2 emissions from the city. The volume of heat sales is increased either by building new extensions to serve specific clusters of customers or via infill development onto existing sections of the network.
- 66 Heat sales are monitored regularly through the monthly invoicing process. The proposed changes to heat tariffs for customers proposed in this report will make the network more attractive to customers, as we look to increase our competitiveness even further against the counterfactual of gas or electric heating.
- 67 Future policy developments, particularly Heat Network Zoning, provide the opportunity to rapidly grow the network.

What is the timetable and who will be responsible for implementation?

- 68 The council intend to implement the changes recommended in this report to customer heat tariffs in time for the new financial year of 23/24, at the next heat price indexation point. This will be the responsibility of the Chief Officer for Sustainable Energy and Air Quality.
- 69 The proposed connection of the Lovells MSFs to the network, if approved, will be introduced to the wider phase 3 programme with a view to completing the works during 2023, following completion of the insulation programme to the Lovells. This will be the responsibility of the Chief Housing Officer.

Appendices

- Confidential appendix 1 - designated as being exempt from publication under the provisions of Access to Information Procedure Rule 10.4(3)

Background papers

- None