Appendix Q: Summary of the HRA Business Plan

1. Introduction

1.1 This report includes a proposal for HRA rent setting for 2023/24 and provides an update to the Housing Revenue Account (HRA) Business Plan, along with highlighting the key assumptions required to reflect national policies and financial impacts to the HRA. The business plan projections reflect the income and expenditure required to manage the landlord function and, at the same time, work towards the Council's objectives to increase Council housing supply in Brent.

1.2 This report does not attempt to summarise all aspects of the HRA business plan but aims to highlight areas where particular issues should be noted and consider options for future budget strategy.

2. National and local policies that can impact the HRA Business Plan

2.1 The HRA self-financing system for Council Housing was implemented in April 2012. Under HRA self-financing, the Council's HRA continues to be a ring-fenced account (income and expenditure) for Council dwellings. HRA self-financing is intended to allow local authority landlords to manage and maintain their own stock from the rental income they generate.

2.2 In October 2018, the government announced that the HRA borrowing cap would be lifted, revoking the previous determinations that specified local authorities' limits on indebtedness. This has provided councils with new borrowing powers to increase their housing supply, with a focus on mixed-tenure development including homes for social rent, affordable rent and shared equity products.

2.3 The Welfare Reform Act 2012 introduced radical changes to the welfare system, which included a reduction of housing benefits for social tenants if their accommodation is considered larger than required. It also introduced a new universal credit system to be implemented over time, where benefit payments would be made directly to the tenant, rather than the landlord. This change increases the risk of non-collection, which could lead to a rise in rent arrears.

2.4 The Welfare Reform Act 2016 imposed a 1% rent reduction a year for 4 years from April 2016 to March 2020. The final financial year of reductions being 2019/20. The resulting loss of rental income for Brent over this period was £23 million when compared to the income that would have been due to the Council if this was not imposed.

2.5 It was therefore necessary to make revenue savings within the HRA to compensate for the loss of rental income. A combination of these savings and the use of HRA reserves has helped to achieve a balanced budget during the period of rent reduction, as required by legislation.

2.6 In October 2017, the government announced a return to the option of increasing rent by CPI plus 1% for 5 years for all local authorities, starting in April 2020. A return to the CPI plus 1% model had helped to provide some stability and certainty over planned investment in the current stock, service improvements and new developments, at least in the short to medium-term.

2.7 Due to exceptional inflation levels and cost of living crisis experienced during 2022/23 financial year, Government published a consultation paper that proposed a cap on social housing rent increases for 2023/24 and identified other options for the level of cap, period of cap and its application. The consultation closed on 12 October 2022. On 14 December 2022 the Government issued its response to the Consultation and set a ceiling of 7% for 2023/24, compared to 11.1% if CPI plus 1% was applied. There will be a reversion to the previous rent setting arrangements from 2024/25.

2.8 The approach to be taken by the government beyond 2025 remains uncertain for all local authorities. In the absence of this information, it is assumed in the business plan that rent will remain as CPI plus 1% after 2025.

2.9 In the context of the 30-year business plan, whilst a CPI plus 1% model helps to provide some stability and certainty, it does not entirely mitigate other risks which are present in the current economic climate. Factors such as the unprecedented increases in energy and material costs, repair and maintenance contracts and anticipated wage increases, mean that any decision to set rents at less than the maximum permitted, provides a significant risk to the sustainability of the HRA. Local authorities still need to cover the inflationary pressures within the HRA whilst delivering on their operational requirements and strategic priorities, some of which are additional legislative requirements, from repairs and maintenance, to building safety, fire safety and decarbonisation. A rent cap or lower than a CPI plus 1% increase combined with increasing costs results in even greater pressure on the HRA and a likely situation of spend exceeding income generated through rent and service charge collection.

2.10 The independent review of building regulations and fire safety, also known as the Hackitt Report, was published in 2018. The report set out over 50 recommendations for the delivery of a robust regulatory system. As a result, in June 2019, the government published the 'Building a Safer Future' consultation detailing proposals to achieve long-term reform of the building safety system. This document sets out the government's proposals for a reformed building safety system covering the performance of all buildings, as well as the management of fire and structural safety risks in new and existing buildings in scope.

2.11 A low-rise fire safety programme was developed by Brent Housing Management to address risks in 1,208 converted and purpose built blocks. With regard to high-rise blocks, it was decided to go over and above regulatory standards by carrying out Type 4 Fire Risk Assessments across all tower blocks over 12 storeys, the outcome of which found no fundamental issues or safety concerns.

2.12 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment, reform and improvement of the stock and its performance. The AMS consists of a 5 year budget requirement totalling £80.8m and spend profiling for this has been incorporated into the business plan.

2.13 As part of the South Kilburn regeneration programme, the Gloucester House & Durham Court site has been redeveloped to provide 235 new affordable homes to assured social tenants. These have been occupied by Brent's residents in 2021/22. Brent Council owns the freehold and the Council's housing team, together with the Council's energy team, provide the billing for heat to the residents. The associated costs are funded by service charges and through the HRA asset management strategy, in line with other communal heating networks.

2.14 In May 2019, the UK government declared a climate change emergency, committing to target net zero carbon emissions by 2050. In July 2019, Brent declared a local climate and ecological emergency, and has committed to working towards carbon neutrality by the year 2030.

2.15 London Councils have included a target of an average EPC Band B rating for London's housing stock by 2030 as part of its joint statement with the London Environment Directors' Network on climate change. Currently, 35% of Brent's Council housing stock is performing better than the national average of Energy Performance Certificate (EPC) band D. However, 100% of housing stock falls short of EPC band B. A key feature of the borough-wide climate strategy will be to achieve an average level of EPC band B by retrofitting all housing properties by 2030.

2.16 Decarbonisation works to Council homes, including energy efficiency works that reduce demand for heat, is an important part of the AMS. The AMS plays an important role in the delivery of the Brent Climate and Ecological Emergency Strategy. Homes account for 42% of direct carbon emissions in the Borough. The target is to achieve an average EPC band B rating by 2030 for Brent council stock, as it is important that the Council leads by example. Energy efficiency works will be important in helping tenants and leaseholders with the cost of living crisis by helping to reduce fuel costs. Supporting households with the cost of living crisis is a key priority in the Council's Draft Climate Strategy Delivery Plan for 2022-2024.

2.17 Whilst major refurbishment work on tower blocks are undertaken, there are opportunities to decarbonise properties to as high a standard as is practicable and achievable targeting at least an EPC B. The five-year Asset Management Plan therefore includes climate emergency works within the tower block programme now rather than having to return in later years with associated disruption and increased costs. The Council is submitting a bid for the Social Housing Decarbonisation Funding grant. If successful, this will provide grant funding for key energy efficiency measures such as external wall insulation, high performance windows, and renewable energy equipment. If the grant is not obtained, this will create further pressures on the HRA capital budget of circa £1.4m.

2.18 The Council has piloted retrofit works on three properties. The retrofit works included external wall insulation, internal wall insulation, installation of PV panels, upgraded the ventilation and replaced the kitchen and bathroom. Whilst the costs of the pilots were significant, this has included non-energy efficiency measures also. The results of the pilots will be considered in conjunction with the housing energy modelling exercise to identify the optimum cost-benefit level, and the various specification options available.

2.19 Brent has committed to an ambitious strategic housing target to deliver 5,000 new affordable homes over the five year period between 2019 - 2024. The 5,000 new affordable homes includes the provision of 1,000 to be delivered directly by the Council by the 31st March 2024 and a further 700 by 31st March 2028. As of November 2022, 684 homes have already been delivered, with more in the pipeline. The current baseline business plan has incorporated the expected delivery of an additional 354 new homes, along with the associated income and expenditure.

2.20 Following the identification of urgent remedial works required to Granville New Homes, Cabinet reviewed the proposed options presented in October 2021. It was agreed to dispose of the blocks at Granville New Homes owned by First Wave Housing (FWH) to the Council's HRA, subject to a consultation with residents. The transfer was finalised on 1 April 2022, which involved the transfer of 84 social housing and 1 leasehold property, along with associated income and expenditures to maintain the stock. Remediation works estimated at £15.4m has been incorporated into the business plan.

3. Rent setting proposal for 2023/24

3.1 The table below shows a snapshot of current average rent levels containing Social and Affordable Rent from occupied properties and the proposed increase of 7% for 2023/24. All re-lets are charged at Formula rent and new builds are charged at Formula or London Affordable rent. Updated rent levels are reflected in the current average rent in 2022/23 and can change depending on time of reporting. The average proposed rent rate for 2023/24 is £8.72 per week (7%) higher than the current financial year.

Proposed Tenant Rents for 2023/24

Bed Size	Current average rent 2022/23	Proposed average rent 2023/24 (7%)	Rent uplift
	£	£	£

Bedsits	92.05	98.49	6.44
1	109.43	117.09	7.66
2	126.85	135.72	8.87
3	138.38	148.06	9.68
4	149.83	160.31	10.48
5	161.90	173.23	11.33
6+	170.08	181.98	11.90
Average rent	**124.70**	**133.42**	**8.72**

3.2 A rent increase of 7% is estimated to result in additional £3.5m of income when compared to 2022/23. This is estimated to be £2m less in income when compared to the previous policy of CPI plus 1 (11.1%). In real terms, this will be the third biggest annual reduction in social housing rents since the introduction of rent restructuring two decades ago. Like most other housing providers, difficult decisions will need to be made to reduce costs in order to close the gap between rental income and increasing cost of service delivery. Brent Housing Management services have identified a target of £3m cost reductions that are incorporated into the budget set for 2023/24 and the business plan.

3.3 For tenants that are in receipt of housing support to help pay their rent, the cost of a rent increase will be met by their housing benefit or the housing element of universal credit, unless the level of support is reduced by factors that may apply to individual circumstances, such as a benefit cap. Brent Housing Management provide support to tenants who are struggling to pay their rent. The primary objective is to ensure that tenants have all the support that they can get, rather than pursuing an eviction. Support options include assessing whether the tenant is claiming all the welfare benefits that they are entitled to, assisting them to claim from the Council's Resident Support Fund and arranging a suitable payment plan. After the onset of the COVID-19 pandemic, Brent Housing Management endeavoured to identify vulnerable tenants and have since kept in contact with tenants in order to ensure that they continue to get the required support to sustain their tenancy.

3.4 The net rent amounts exclude service charges. Service charges are a recharge to tenants and leaseholders based on actual costs incurred in providing specific services, such as estate cleaning.

3.5 It is recognised that cost of living crisis and increased rental charges can have an adverse impact on the level of rent collections. Approximately 40% of rent charges are covered through housing benefit payments, which is estimated at £20m. The remaining 60% of income estimated at £30m are paid directly by tenants who are in employment or in receipt of universal credit and would be at risk of non-collection.

3.6 Collection rates 2022/23 on average, stood between 95% - 96%. If this level of rent collection remained consistent for the year, this would result in an additional budget requirement of £2.4m in order to allow for potential non-payments. The Council’s Resident Support Fund helps to alleviate some of financial hardship being faced by tenants. However, collection rates are still expected to continue to be impacted. For every 1% drop in collection, the loss of income is estimated at £0.5m. Bad debts have been assumed at 2% of rental income per annum over 30 years, this equates to an average £1.8m rent loss per annum over the course of the business plan.

3.7 Supervision and management costs include allowances for pay inflation uplifts in the business plan. An assumed 6% inflation, similar to current year, is estimated to amount to an additional £0.7m budget requirement in 2023/24 compared to previous year. Future pay inflations have been assumed at 4% in year 2 and 3% per annum after that in the business plan.

3.8 Repairs, maintenance and general costs include annual inflationary uplifts. The general cost inflations in the business plan are assumed at 2% in year 2, followed by a reduction to 1% in year 3, during possible negative inflationary period forecasted by Office of Budget Responsibility (OBR). The following years are assumed to increase gradually to 3.5% from year 7 onwards.

3.9 From financial year 2023/24, there is an increased focus on energy efficiency works and major works to tower blocks. The business plan has incorporated £40m over the next three years on tower block refurbishment programme. The blocks are Kilburn Square, Lodge Court, Manor Court and Windmill Court. These blocks were built in the late 1960’s and whilst they have had repairs and refurbishment undertaken over the last 60 years, there are further investment required in order to increase the estimated life of the blocks by more than 40 years.

3.10 Efficiency savings targets are incorporated into the budget setting process and business plan, in line with the Council’s overall budget setting process. A 0.5% efficiency target across management and repairs is assumed in the business plan in the first 5 years, followed by 1% over the course of the remaining 25 years, equating to an average saving of £0.3m per annum over 30 years. This saving target is following significant cost reduction of £3m incorporated into budget setting for 2023/24 and is equivalent to 10 years worth of efficiency saving projections in the business plan.

3.11 The HRA business plain aims to set aside appropriate funds and incorporate a voluntary debt repayment policy that mirrors the General Fund approach. The calculations involve profiling debt repayments for new builds over 60 years, and debt repayment for major works over 25 years, based on the rate of borrowing for the debt. The repayment modelling commences from debt incurred in 2019/20 onwards, reflecting the period when HRA borrowing exceeded a previously set debt cap of £199.3m. In practice, repayments will be possible in years where there is capacity within accumulated operating reserve.

3.12 HRA operating reserve as at 31st March 2022 was £0.4m, and it is not anticipated to be used while rent increases are set at CPI plus 1%. The opening reserve balance has reduced by £0.9m compared to last year, due to partially funding a provision in 2021/22 for identified capital works to the Granville New Homes blocks that have transferred to the HRA from First Wave Housing on 1st April 2022. HRA reserves were used to cover the timing difference and the provision will be released when works commence, returning the HRA reserve to the previous value of £1.3m.

3.13 Currently, the business plan model aims to achieve a minimum operating reserve balance that represents an estimated 3% of rental income, which is approximately £1.6m in 2023/24. The operating reserve balance of £1.3m is not projected to reduce, however due to increased cost pressures in the current economic climate, a rent cap of 7%, along with increased investment to improve high rise blocks in line with the AMS, target reserve levels are projected to be achieved from year 6 onwards, at an estimated balance of £1.9m. The operating reserve is necessary to manage unexpected deficits, or for smoothing in-year budget pressures due to timing differences between the cost of building new homes and receiving rental income, so that it can offset the increased borrowing costs. In addition to the need for the HRA to balance competing demands, such as investing in supply of new homes, the Covid-19 pandemic and inflation has further stressed the importance of maintaining adequate level of reserves.

4. Summary of key assumptions in the HRA Business Plan

4.1 The HRA business plan provides long-term financial forecasts resulting from the implications of the Council's spending, investment and rent-setting decisions, based on the authority's current income, expenditure and investment expectations. The data is combined with key assumptions on how costs and income might change in the future to illustrate what the authority can reasonably expect to happen, using the best available information.

4.2 Regular review of assumptions is important in order to help the Council to make early decisions that help keep the HRA in balance, whilst also delivering substantial levels of investment in Council housing.

4.3 A summary of the key assumptions that underpin the 30 Year Business Plan are presented below:

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
HRA stock movements	Projected rental income is based on stock numbers	Baseline stock numbers in the current year are adjusted for projected RTB sales and new affordable housing supply

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Inflation on supplies and services	All income and expenditure is adjusted for inflation to reflect general cost increases. CPI forecast is based on rate in September of previous year.	Rental income uses CPI, all other expenditure is assumed at RPI. CPI 6% in year 2, reducing to 2% from year 7 onwards. RPI 2% in yr 2, reducing to 1% in yr 3, then gradually increasing to 3.5% from year 7 onwards.
Minimum Working Balance	Target level of minimum reserve for any overspends	Working balance requirements assumed at 3% of income giving circa £1.6m
Rental Income	Tenant rent projections are driven by stock numbers and average rent. Tenant rent is the largest source of income for the HRA	Average rent is currently set at £133 per week. Rent is adjusted as per government policy. Assumed CPI+1% for duration of business plan
Supervision and Management Costs	Rental income is allocated to management costs of providing a landlord service	Cost assumed to increase by RPI each year
Service Charges	Cost of specific services are charged back to tenants and leaseholders	Service charge uplift is in line with anticipated cost increases at RPI
Voids	Level of void properties have an impact on rental income that can be charged	Rent loss though voids is estimated at 1% of rent
Bad Debts	Rent arrears that are not collected results in loss of income	Assumed on average 2% of rent
Repairs and Maintenance Costs	Rental income is allocated to repairs budgets	Expenditure is adjusted in line with RPI and stock movements

Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Right to Buy Sales	Stock reductions reduce rental income and set a target for the Council to achieve 1-4-1 replacements	Projected 15 sales per annum
Interest rate on borrowing	Rental income is allocated to financing debt	New debt is assumed at interest rates of 5.2% in year 1, gradually reducing to 3.5% from year 4 onwards
Capital Programme - Major Works	Investment to maintain housing stock	Profiling over first 4 years based on Asset Management Strategy. Asumed £15m per annum from year 5 onwards.
HRA Debt Balance	The HRA debt balance as at 31st of March 2022 was £268m.	Accumulated reserve balances will determine capacity for debt repayments
RTB Receipts	Rolling five year spend targets are set by MHCLG based on RTB sales	It is currently assumed in the business plan that spend targets will be met to achieve 1-4-1 replacement of homes.
Affordable Housing Supply	The Council has committed to providing 1,700 affordable homes by 31 March 2028	The current baseline business plan assumes 354 new affordable homes with an estimated cost remaining in the business plan of £51m over 6 years.
Efficiency Savings	Savings contribute towards offsetting budget pressures	0.5% first 5 years then 1% efficiency savings target across revenue costs for management and repairs

5. Sensitivity Analysis

5.1 Alongside the baseline assumptions, sensitivity analysis have been undertaken to explore the impact on reserve balances from a range of assumptions. Considering each of these in turn enables to read the baseline financial projections in the context of potential changes, and so gives an indication of key risks. The key sensitivities analysed are:

A) Baseline assumptions

B) RPI cost inflation 0.5% higher in years 2 to 4
C) Repairs and major works 1.5% higher than inflation in years 2 to 4
D) Rent freeze imposed from 2025/26 for 4 years
E) Voids and bad debts 0.5% higher from year 2 onwards
F) CPI reduction by 0.5% from year 7 onwards

5.2 The sensitivity analysis demonstrates that:

A) Baseline assumptions avoid deficits over 30 years with a projected reserve balance of £134.4m in year 30.

B) Cost inflations to RPI for all expenditure items, between years 2 to 4 from current economic uncertainties absorb inflations in the short-term at 0.5% higher than baseline; this is projected to result in a reduced reserve balance in year 30 at £115.2m (£19.2m less than baseline).

C) Repair cost inflations of 1.5% above baseline from year 2 to 4, are projected to be absorbed within the business plan model, if all other baseline assumptions remain consistent. The reserve balance in year 30 is projected to be £79.1m (£55.3m less than baseline).

D) A 4 years rent freeze from 2025/26 can have a significant impact on the health of the business plan, particularly in the immediate short-term, resulting in projected budget deficit totalling £28m, making it unviable over 30 years without mitigating cost reduction being identified.

E) Rental income inflations assumed in the baseline are projected to absorb 0.5% increases to voids (1% baseline) and bad debts (2% baseline) over the life of the business plan. The projected 30-year reserve balance is £109.1m (£25m less than baseline).

F) If average annual CPI was to reduce by 0.5% to 1.5% from year 7 onwards, average rental income inflation per annum will be 2.5% per annum. The impact of this will lead to a budget deficit of £7m in the business plan, making it unviable over 30 years without mitigating cost reductions being identified.

6. Risks

6.1 The business plan is based on a set of assumptions, and there will always be an element of risk of significant changes in cashflow projections in the revenue and capital accounts, if any of the assumptions fail to materialise.

6.2 The main variables that could affect the long-term viability of the Business Plan are rent levels and long-term major works and repairs. There has already been a change to the Council’s power to increase rents annually up to a maximum of CPI plus 1%, with an introduced rent rise limitation of 7%, and after April 2025, the implications of future Government regulated rent policy remain uncertain.

6.3 War in Ukraine, the long-term impact of COVID-19, Brexit, high levels of inflation, labour shortages and rising interest rates present the Council with a volatile and uncertain economic environment. The cost of living crisis will impact residents of Brent and the Council is committed to doing what it can to support those in greatest need. Cost pressures and risk of income collection losses are continuously monitored.

6.4 Inflation is running at such high levels that have not been seen since the 1980's. Besides rising energy costs, other goods are also experiencing increases in prices, due to factors such as labour shortages, pay rises, logistics issues and a general trend to increase prices and restore profit margins where previously slumps in demand had suppressed price levels.

6.5 In September 2022 CPI stood at 10.1% against a Bank of England target of 2%. The September inflation figures are important as they are used for the following years uplift on formula rent levels, 2023/24 being an exception with a 7% ceiling. The gap between inflation on rent levels and inflation on costs is a significant risk to the long-term business plan. Inflation rates assumed in the current business plan is informed by projections from the Office for Budget Responsibility (OBR), which is forecasting a likely period of negative inflation in the short-term. For business planning purposes, negative inflation has not been modelled for expenditures in order to allow some room for uncertainty, while at the same time inflation on rent has been modelled in line with OBR projections.

6.6 The impacts of Universal Credit and cost of living crisis can affect the HRA Business Plan, as the number of rent arrears may increase considerably. A number of mitigations are in place to help support tenants with universal credit such as:

- Continuing raising awareness with residents about Universal Credit, including what it means for them
- Developing future delivery partnership with DWP
- Establishing delivery partnership agreement that supports the most vulnerable
- Increasing provision for digital inclusion and improve capacity for residents to manage accounts independently
- Continuing to review strategy for maximising rent collection that reflects Universal Credit implications for transition and full service
- Investing in technology to optimise operating process and generate efficiencies

6.7 As the Council adds more stock to its portfolio and complexities of new additional requirements to building standards are increasing, such as fire safety works and climate change, the cost of major works is rising. At the moment, there is insufficient government subsidy available to address these changes. The Asset

Management Strategy and investment plans must be approached cautiously and allow for flexibility to scale back on schemes where required.

6.8 Impacts of national housing policies and any changes proposed in future Government papers can have an adverse impact on the HRA and could require additional resources to address any unexpected changes.

6.9 Whilst the Council is confident in its ability to continue delivering affordable homes for Brent residents, there are social and economic factors, which are increasingly placing pressure on both current schemes that are on site and those in the Council's pipeline. Brexit, rising inflation, a continued shortage of labour, materials and events such as the Covid-19 pandemic and the war in Ukraine have had an adverse effect on costs and therefore the financial viability of each capital scheme. The Government reported an increase of 23% on materials such as steel, timber and concrete last year alone. The Council was previously using a build cost of circa £2,000 - £2,500 per sqm to test financial viability. From 2022/23, the Council is using a build cost of £3,000 - £3,500 per sqm to test viability of schemes in the New Council Homes Programme. The Council also applies a 10% contingency to each schemes estimated build costs in order to mitigate against inflationary rises when assessing viability.

6.10 The HRA debt cap has been removed and significant borrowing is required to invest in stock in order to increase housing supply in Brent. The HRA is exposed to interest rate fluctuations, which can have a significant impact on revenue budgets and the overall business plan. Brent Council operates a one-pool approach to its borrowing, where the HRA receives a proportion of the Council's overall borrowing but with a reduced rate. Having remained at 1% or less since February 2009, base rates began rising in June 2022. The forecast borrowing rate for the HRA is informed by the Bank of England Monetary Policy, with projections for base rates to peak in 2023/24. Interest rates for new borrowing in the HRA are currently assumed at 5.2% in 2023/24, with a gradual reduction annually to 3.5% from 2026/27 onwards.

6.11 Spend targets for 1-4-1 receipts set by Government mean that the Council may need to transfer receipts with compounded interest, if spend targets are not met within 5 years of receiving the receipt. There is currently sufficient schemes in pipeline to be able to utilise receipts towards adding affordable housing in Brent.

6.12 There are also demographic changes and a general recognition that there should be better integration of housing, social care and health services. As time goes on, a proportion of the population who are elderly or vulnerable increases and there is an increased need for appropriate housing. However, with limited clarity on the government's funding of supported housing, it is likely that the problem of how to house vulnerable elderly people will intensify.