

Appendix O: Summary of the HRA Business Plan

1. Introduction

- 1.1 This report sets out the HRA rent setting strategy for 2025/26 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 implemented a 7% rent rise limitation for 2023/24, compared to 11.1% if CPI plus 1% was applied. This ceiling resulted in an estimated £2m reduction of income when compared to the standard policy of CPI plus 1%. Like most other housing providers, difficult decisions were required to reduce costs in order to close the gap between rental income and increasing cost of service delivery. Brent Housing Management services identified £3m worth of cost reductions during budget setting for 2023/24. There was then a reversion to the standard rent setting arrangements in 2024/25 and the government extended the current CPI plus 1% rent settlement by one year to cover 2025/26.
- 2.8 The approach to be taken by the government beyond 2026 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 2026.
- 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 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 highrise 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 Building Safety Act 2022 (BSA 2022) introduces fundamental reforms to the law and regulation of building safety, which seek to secure the safety of people in or about buildings and improve the standard of buildings. The scope and impact of the BSA is far-reaching. Its provisions will affect the design, planning, construction, occupation and alteration of future buildings. The Building Safety Regulator will be responsible for all regulatory decisions during the design, construction, occupation and refurbishment of High Rise Buildings (HRBs), which has been defined pursuant to the legislation as buildings over 18 meters or has at least 17 storeys.
- 2.13 The Council Housing Asset Management Strategy (AMS) 2022-2026 sets out a vision for responsive repairs, investment in high rise blocks, reform and improvement of the stock and its performance. The AMS consists of a 5-year budget requirement totalling £104m and spend re-profiling for this has been incorporated into the business plan.
- 2.14 Brent's high-rise blocks that are being retained require significant investment in terms of external fabric, internal works, and mechanical and electrical services. These high-rise blocks built in the 1960's and 1970's require major works if they are to achieve a further lifecycle beyond 40 years. The external walls of most of these blocks are in poor condition. Without refurbishment, these will deteriorate further and beyond the point of affordable refurbishment. The dwellings are generously sized and with refurbishment will continue to offer good accommodation to residents. The mechanical and electrical services are nearing the end of their usable life. Officers plan to undertake the major refurbishment and fire safety measures such as installing sprinklers. The business plan has incorporated £39.4m of investment over five years starting from 2025/26 on tower block refurbishment programme. The blocks are Kilburn Square, Lodge Court, Manor Court, Windmill Court, The Oaks and Watling Gardens (three blocks).
- 2.15 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.
- 2.16 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.

- 2.17 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, 54% of Brent's Council housing stock has had an energy survey, of which 58% is performing better than the national average of Energy Performance Certificate (EPC) band D. However, 96% 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.
- 2.18 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.
- 2.19 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 has been awarded £1.3m from the Social Housing Decarbonisation Funding grant. This will provide some contribution towards key energy efficiency measures such as external wall insulation, high performance windows, and renewable energy equipment. £580k of the fund has already been drawn down and a further £300k is expected to be drawn down in the financial year.
- 2.20 The Council has a commitment to deliver 5,000 affordable homes in the borough by 2028, of which 1,700 will be delivered directly by the Council. As of December 2024, 879 homes have already been delivered by the Council, with more in the pipeline. The projected capital investment for acquiring and constructing new council homes in 2024/25 is £19.3m and a further £15.5m allocated for 2025/26.
- 2.21 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 are estimated to cost the HRA £15.4m.

3. Rent setting proposal for 2025/26

3.1 The table below shows a snapshot of current average rent levels from occupied properties and the proposed increase of 2.7% for 2025/26. All new re-lets are charged at Formula Rent and new builds are charged at Formula or Affordable Rent that are in line with Greater London Authority (GLA) benchmarks and are adjusted annually in line with rent standards. Updated rent levels are reflected in the current average rent for 2024/25, average rent can change depending on time of reporting. The average proposed rent rate for 2025/26 is £3.93 per week (2.7%) higher than the current financial year.

Tenant Rents for 2025/26

Bed Size	Current average rent 2024/25	Proposed average rent 2025/26 (2.7%)	Rent uplift
	£	£	£
Bedsits	106.31	109.18	2.87
1	127.65	131.09	3.44
2	148.31	152.31	4.00
3	160.74	165.08	4.34
4	176.21	180.97	4.76
5	188.69	193.78	5.09
6	196.00	201.29	5.29
7	242.18	248.72	6.54
Average rent	145.51	149.44	3.93

3.2 A rent increase of 2.7% is estimated to result in additional £1.6m of income when compared to current levels of income. This is due to national inflation increasing by 1.7% compared to last year, which is a reflection of current economic climate.

3.3 For tenants in receipt of housing support to help pay their rent, the cost of 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 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. Brent Housing Management endeavour to identify vulnerable tenants and maintain 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 37% of rent charges are covered through housing benefit payments in 2022/23, which is estimated at £19.8m. The remaining 63% of income estimated at £34.1m 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 2024/25 on average stood at 97%. If this level of rent collection remained consistent for the year, this would result in an additional budget requirement of up to £1.9m in order to allow for risk of 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 £0.6m. Bad debts have been assumed at 2.1% of rental income per annum over 30 years, this equates to an average £.2m 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 2% inflation, similar to current year, is estimated to amount to an additional £0.2m budget requirement in 2025/26. Future pay inflations have also been assumed at 2% in every year after 2025/26, in line with inflation falling back to the Bank of England's inflation target.
- 3.8 Repairs, maintenance and general costs include annual inflationary uplifts. The general cost inflations in the business plan are assumed at 3.2% in year 2, followed by a reduction to 3.1% in year 3 and 4, during forecasted reduction to inflation as per Bank of England Monetary Policy. Following years are assumed to increase gradually to 3% from year 5 onwards in business plan.
- 3.9 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% per annum 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 in addition to the £0.8m cost reduction incorporated into budget setting for current year 2024/25, along with a further savings target of £0.7m for 2025/26.

- 3.10 HRA business plan aims to set aside appropriate funds and incorporate a voluntary debt repayment policy that mirrors the General Fund approach. Calculations involve profiling debt repayments for new builds over 55 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 from 2019/20 onwards, reflecting the period when HRA borrowing exceeded previously set debt cap of £199.3m. In practice, repayments will be possible in years where there is capacity within accumulated operating reserve.
- 3.11 Operating reserve as at 31st March 2024 was £2.4m, and it is not anticipated to be drawn down while rent increases are set at CPI plus 1%. The opening reserve balance had increased by £2m compared to the previous financial year predominately as a result of interest charge in 2023/24 being less than anticipated due to a combination of less than expected borrowing for new builds, a use of alternative funding sources and favourable interest rates received on balances, as well as adjustments made on expected credit losses for rent arrears balances.
- 3.12 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. The target operating reserve balance is set at 5% of rental income in the business plan, which is approximately £3m in 2025/26. The operating reserve balance is not projected to reduce below £2.4m, however due to increased cost pressures in the current economic climate, previous rent cap of 7%, along with increased investment to improve high rise blocks, target reserve levels are projected to be achieved from year 6 onwards, at an estimated reserve balance of £3.7m.

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 at the time.

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
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 2.4% in year 2, reducing to 2% from year 5 onwards. RPI 3.2% in year 2, reducing gradually to 3% from year 5 onwards.
Minimum Working Balance	Target level of minimum reserve for any overspends	Working balance requirements assumed at 5% of income giving circa £3m
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 £146 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 estimated at 1.7% of rent
Bad Debts	Rent arrears that are not collected results in loss of income	Assumed on average 2.1 of rent
Description	How it impacts the Business Plan	Assumptions used in the Business Plan
Repairs and Maintenance Costs	Rental income is allocated to repairs budgets	Expenditure is adjusted in line with RPI and stock movements
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 average interest rate of 4.6%.
Capital Programme - Major Works	Investment to maintain housing stock	Profiling over 5 years based on Asset Management Strategy.
HRA Debt Balance	The HRA debt balance as at 31st of March 2024 was £300.9m	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 1,957 affordable homes by 31 March 2028	As of December 2024, the council has delivered 879 new homes. The projected capital investment for acquiring and constructing new council homes in 2024/25 is £19.3m and a further £15.5m allocated for 2025/26.
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 £205.5 in year 30, which could potentially be used to reduce debt.
- B) Cost inflation to RPI at 0.5% above baseline assumptions between years 2 to 4, is projected to result in reduction to current reserve balance to manage

budget pressures in the short term. Projected 30-year reserve balance is £175.9m (£29.6m less than baseline).

- C) Repair cost inflations of 1.5% above baseline from year 2 to 4, are projected to reduce existing reserve balances to manage budget pressures in the short term. The reserve balance in year 30 is projected at £169m (£36.2m less than baseline).

- D) A four-year 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 of £17m over 4 years and £117m accumulated deficit over 30 years, making it unviable without significant cost reduction being identified.

- E) Operational performance on void turnaround and income collection rates can have a significant impact on budgets. 0.5% increases to void rent loss (1.6% baseline) and bad debts (2.1% baseline) over the life of the business plan is projected to increase budget pressures over the next 6 years. It is estimated that reserves are likely to be reduced significantly below target levels to balance budgets over this period, leaving HRA at risk of deficit if mitigating cost reductions estimated at £5.9m over next 6 years are not identified.

- F) If average annual CPI was to reduce by 0.5% to 1.5% from year 7 onwards, while inflation on expenditure remained the same as baseline at 3%. The average rental income inflation per annum will be 15% per annum. Reserve balance in year 30 is projected at £49.2m (£1563m below baseline).

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% in 2023/24. Implications of future Government regulated rent policy remain uncertain beyond April 2026.

- 6.3 Global conflicts, the long-term impact of pandemic, 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 over the past year has experienced 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, logistic 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 2024 CPI stood at 1.7% 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, as opposed to 11.1%. 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 Bank of England, which is currently forecasting CPI inflation to return to the 2% target by the end of 2025.
- 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 on universal credit, along with Council Resident Support Fund to help with financial hardship.
- 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 decarbonisation, the cost of major works are 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, inflation, shortage of labour, materials and global events such as Covid-19 pandemic and wars have had an adverse effect on costs and therefore the financial viability of capital schemes. Developing affordable housing remains challenging within the current market which is resulting in the tenure of schemes being revisited and some pipeline schemes pausing. Though cost of materials have recently stabilised, they remain high. 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 Significant grant funding is essential to pay for new build schemes. The Council has entered into grant agreements with the Greater London Authority governing the award of such funding to include the requirement to deliver specified numbers of new homes with start on site dates specified. Failure to observe grant conditions or achieve specified delivery numbers may lead to a requirement to repay grant funding and therefore efficient and timely delivery approaches are essential to mitigate the risk.
- 6.11 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 remain at current rates of 5% until 2024 Q3 and decline gradually to 3.55% by 2029. Interest rates for new borrowing during this period in the business plan have been assumed at an average rate of 4.6%.
- 6.12 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 are currently sufficient schemes in pipeline to be able to utilise receipts towards adding affordable housing in Brent.
- 6.13 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.