

**London Borough of Enfield
Council**

Meeting Date: 24th February 2022

**Subject: Housing Revenue Account (HRA)
Budget 2022/23, Rent Setting and Business Plan Update**

**Cabinet Member: Councillor Needs, Cabinet Member for Social Housing
Councillor Mary Maguire, Cabinet Member for Finance &
Property**

**Executive Director: Sarah Cary, Executive Director Place
Fay Hammond, Executive Director Resources**

Key Decision: KD5354

Purpose of Report

1. This report sets out the proposed HRA 30-Year Business Plan, the detailed HRA Revenue Budget for 2022/23, the ten-year Capital Programme and Right to Buy (RTB) One for One Receipts programme. In this context the annual rent increase for Council tenants and service charges for tenants and leaseholders is proposed.

Proposals

2. Following the approval and recommendation by Cabinet on the 16th February, Council is requested to :
3. Approve the HRA 30-Year Business Plan shown in Appendix 1
4. Approve the detailed HRA Revenue Budget for 2022/23 as shown in paragraph 77.
5. Approve the 10-year HRA Capital Programme of £1,121m and borrowing requirements to deliver 3,500 council led homes.
6. Approve a rent increase of 4.1% (CPI + 1%) in line with Government guidelines noting the social and affordable rent levels for circa 10,484 HRA properties in 2022/23.
7. Approve the level of service charges for 2022/23 for those tenants and leaseholders receiving eligible services.
8. Approve the charges for garages and parking bay rents as set out in paragraph 64.

9. Approve the charges for community hall hire, including a deposit system, and delegate authority to the Director of Housing and Regeneration in consultation with the Cabinet Member of Social Housing to review and implement a new policy with a view to a more flexible charging system in appropriate circumstances.
10. Approve entering into the GLA grant agreement as part of the Affordable Housing Programme 21/26 and acceptance of the successful GLA grant bid of £166.5m and for starts from 2023 to 2028.
11. Note the heating charges for 2022/23 for those properties on communal heating systems (both electric and gas), including a mid-year review to understand the impact of the energy contract renewal which will apply from September.
12. Approve the establishment of 4 posts in the 2022/23 revenue budget to support the Building Safety requirements of our high-rise blocks. To note the Housing Team will be progressing with resident engagement on the introduction of a new service charge in 2023/24 in relation to these costs.
13. Approve that Enfield, as one of the ten Constituent Authorities of the LHC (London Housing Consortium) Joint Committee, withdraws from the LHC Joint Committee, resulting in its potential disbandment in December 2022 at the earliest. This means that the LHC will no longer be an outside body subject to council nominations.

Reason for Proposals

14. This report is presented to Council on annual basis for the following reasons:
 - To ensure that a balanced 30-Year HRA Business Plan is approved by Council.
 - To ensure that the HRA Budget is set by the Council and that this budget does not put the HRA into deficit.
 - To set the affordable and social rent and service charge levels for HRA properties, in line with the Government's Social Housing Rent Policy. This decision must be taken early enough for the tenants to be advised of the change at least 4 weeks prior to the date of that change.

Relevance to the Council Plan

15. Develop affordable homes, ensure we set fair rents, improve existing housing stock to create a lifetime of opportunities in Enfield, providing Good Homes in well-connected Neighbourhoods, and Sustaining Strong and Healthy Communities.

Background

16. In October 2019 the Government announced a change to the Social Housing Rent Standard Policy that from April 2020 for a 5-year period, local authorities could increase rents by CPI+1% which has been incorporated into the Business

Plan. This follows a period of reductions to rents which have affected capacity in the Business Plan to fund services and investment in homes.

17. Below are the key changes for Housing since the 2021/22 Rent Setting report which have had implications on the Business Plan:

- The impact of Covid-19 on the HRA revenue and capital budgets
- Updated Right to Buy (RTB) legislation
- Revised 10-year capital programme to secure ongoing delivery of new homes and investment in existing homes
- An update on the Sheltered Housing de-designation strategy
- The enhancement of the ground's maintenance service and improvements on our estates to match requirements arising from changed lifestyles
- Energy market update and assistance for residents

Main Considerations for the Council

18. HRA 30-year Business Plan – the overarching assumptions in the HRA Business Plan are as follows:

Item	Assumption	Information
Inflation on supplies and services	3.1% Consumer Prices Index (CPI) increase for 2022/23, 3% until 2024/25, then 2%	Based on September CPI of 3.1%
Salaries	2% Pay Award	In consultation period
Rent – Existing council housing tenants	CPI (3.1%) plus 1% assumed from 2022/23 for 4 years, then CPI only	CPI is the rate at September which was 3.1%
Rents – Council new build affordable homes	CPI (3.1%) plus 1% assumed from 2022/23 for 4 years, then CPI only	London Affordable Rents (BCHL, Better Council Houses for Londoners) Social Rents (AHP, Affordable Houses Programme))
Repairs & Maintenance cost increases	3.1% Consumer Prices Index (CPI) increase for 2022/23, 3% until 2024/25, then 2%	
Investment Capital Programme	Annual amounts based on the updated estimated cost of replacing components, kitchens, roofs, windows, bathrooms etc. in the year that they fall due for replacement.	Budget reflects a programme approach
Fire Safety Works	Based on estimated costs of fire safety works but excluding any new requirements arising from legislation	All costs budgeted for included in the capital programme. Still awaiting Government guidance on the new Building Safety Standards
Capital Programme – Estate Renewal and Development	Costs of current Programme included in the Business Plan based on the latest capital monitoring information.	3,500 new homes built into the plan over the next 14 years
RTB Sales	60 for 2022/23	Actual RTB sales at period

	then 20 per annum from 2023/24 onwards	8 in 2021/22 show 51 sales
Operation of the Governments RTB One for One Replacement scheme	The Council will operate the scheme in accordance with Government guidelines. The RTB receipts are currently match funded by the HRA on a 40:60 basis.	Retention agreement entered into to allow a further 5 years to spend the receipts
Interest rate on borrowing	5.5% on existing debt 3.48% on self-financing debt 2.5% on new debt in 2022/23 then, 3.5% on new debt ongoing	Reflects actual debt costs and Treasury Management Strategy
Interest rate on balances	0.02%	Estimated 7-Day London Inter Bank Bid (LIBID) rate
Repayment of Debt	The loan principal will be paid back in full when it falls due. Interest is charged annually over the life of the loan.	HRA debt is expected to increase by £386m over the next 10 years

Proposed Rent Charges for HRA Properties 2022/23

19. Enfield follows the Government's Social Housing Rent Standard which sets out how councils should increase rents each year. From April 2020 the rent settlement for the next 5 years is CPI + 1%, CPI being based on September's rate.
20. September's CPI is 3.1%. In following the rent standard in 2022/23 rents will increase by 4.1%, this is an increase of 1.1% to the assumptions in the Business Plan of CPI of 2%.
21. The table below shows examples of the rents for 2022/23 for different HRA property types and sizes across the borough. It should be noted that these will vary for each tenant. The new rents will be operative from 4th April 2021 (the first Monday in the month) and apply to circa 10,100 properties on social rents.

Property Type	Average Rent 2021/22	Average Rent 2022/23	£ Increase	% Increase
Bedsit	84.19	87.64	3.45	4.1%
1 Bed Flat	89.24	92.90	3.66	4.1%
1 Bed House	100.99	105.13	4.14	4.1%
2 Bed Flat	98.59	102.63	4.04	4.1%
2 Bed House	112.33	116.94	4.61	4.1%
3 Bed Flat	109.16	113.64	4.48	4.1%
3 Bed House	123.07	128.12	5.05	4.1%
4 Bed Flat	115.82	120.57	4.75	4.1%
4 Bed House	129.17	134.47	5.30	4.1%
5 Bed House	141	146.78	5.78	4.1%
6 Bed House	163.21	169.90	6.69	4.1%
Average Rent	103.09	107.32	4.23	4.1%

22. Within the formula rent calculation there is the ability to charge up to 5% more on the base rent levels for specific reasons, for example, a new build council house, these rents exclude service charges. This flexibility hasn't been applied to the current HRA stock but given the 2021-26 Affordable Housing Programme is based on Social Rent levels (as opposed to London Affordable Rent LAR) this will be reconsidered.
23. In October 2016, Cabinet agreed Affordable Rent levels to apply to all New Homes built or acquired by the Council. The Rent Setting Policy agreed that 'When the Council builds or acquires new or additional properties then consideration will be given to letting these at the higher affordable rent level inclusive of service charges. Affordable rents are based on Local Housing Allowance (LHA) rates and median income in Enfield.
24. Rents for re-provision in regeneration projects will be charged at re-based social rent levels, plus the 5% tolerance recognising the wider financial benefits of living in a home with a higher thermal comfort rate.
25. As part of the GLA grant conditions all future development schemes will be charged the 'London Affordable Rent' or 'Social Rents' instead of 'Enfield Affordable Rent'. Tenants currently on Enfield Affordable rents will remain and increased as part of the Social Rent Policy.
26. The Enfield Affordable Rents, which applies to circa 175 properties, are inclusive of service charges and have been increased in line with the Social Housing Rent Standard which is 4.1% (CPI +1%) as follows:

Enfield Affordable Rent	2021/22	2022/23	Increase per week
	£	£	£
1 bed	163.47	170.17	6.70
2 bed	198.2	206.33	8.13
3 bed	215.57	224.41	8.84
4 bed	230.89	240.36	9.47

27. In 2016 the Mayor of London introduced the London Affordable Rent on all new schemes funded with Greater London Authority (GLA) grants. These affordable rents will only be applicable on properties delivered through the BCHL GLA programme which have received grant. It should be noted that these rents are weekly and exclude service charges.
28. The following table shows the published rents for 2022/23 and this rent applies to circa 109 properties:

London Affordable Rents	2021/22	2022/23	Increase per week
	£	£	£
Bedsit and one	161.71	168.34	6.63

bedroom			
Two bedrooms	171.2	178.22	7.02
Three bedrooms	180.72	188.13	7.41
Four bedrooms	190.23	198.03	7.80
Five bedrooms	199.73	207.92	8.19
Six or more bedrooms	209.24	217.82	8.58

29. The below table shows the increase in Council owned properties over the next 10 years, based on Council Housing's development programme.

Current stock numbers	10,484
RTB sales	-240
GLA grant funded & RTB programme	1,924
Expected stock numbers	12,168

Proposed Tenants Service Charges 2022/23

30. Councils are entitled to recover the costs of these services from tenants. Whist service charges are not governed by the same factors as rent, authorities are required to comply with expectations to help keep charges affordable for tenants with reference to the agreed rent indexation level.

31. Service charges to tenants have been set for 2022/23 in accordance with Council policy to recover the costs from all tenants receiving the services. Where new or extended services are introduced, an additional charge may need to be made, in this instance the Council should consult with tenants.

32. It is recommended that the following service charges are made to those tenants in receipt of the services below:

Service	Current 2021/22	Proposed 2022/23	Overall change	Enhanced service change	Reason for change
	£ per week	£ per week	£ per week	£ per week	
Concierge	10.72	10.97	0.25	n/a	Contract inflation
CCTV	From 0.16 to 2.04	From 0.17 to 2.12	From 0.01 to 0.08	n/a	Costs of providing service
Grounds Maintenance	1.96	2.28	0.32	0.30	Inflation and enhanced service
Caretaking Service	From 2.28 to 6.07	From 2.37 to 6.32	From 0.09 to 0.25	Average 13p	Inflation and enhanced service
Sheltered Caretaking	From 1.61 to 3.52	From 1.64 to 3.59	From 0.03 to 0.07	n/a	Costs of providing service
Sheltered Housing Mgt Fee (new tenants only)	From 23.62 to 29.65	From 23.86 to 29.95	From 0.24 to 0.30	n/a	Costs of providing service
Sheltered Cleaning – Level 1 *	0.9	0.92	0.02	n/a	Costs of providing service
Sheltered Cleaning – Level 2	2.08	2.13	0.05	n/a	Costs of providing service

*					
Sheltered Cleaning – Level 3 *	2.96	3.03	0.07	n/a	Costs of providing service
Landlord Communal Service Charge	From 0.29 to 3.29	From 0.30 to 3.39	From 0.01 to 0.10	Average 10p	Inflation and enhanced service
Communal Electricity (Average)	15.28	16.04	0.76	n/a	Energy price increases

* Sheltered Cleaning has three different charges based on a combination of the number of weekly cleaning hours and the number of properties within a block.

33. The table above shows the increases to the service charges from April 2022. There have been enhancements to several services based on residents' requests and the cost per week of these enhancements are shown separately in the table above, with details of enhanced services in the report below.

Grounds Maintenance

34. In 2021/22 it was agreed to provide additional investment to improve the environmental conditions of estates following lifestyle changes as a result of the pandemic. Feedback from residents and members was that the standard of estate services could be improved and having a clean, safe and well-maintained environment in which to live is important to tenants. It is recognised that the appearance of an estate or group of homes enhances well-being and provides a positive environment in which to live. The Council therefore aims to make its homes and surrounding areas as attractive and well maintained as possible, provide greater opportunities for safe play and enjoyment and enhanced recycling facilities.
35. Following internal review, a number of improvements in this service have been implemented which include:
- a. Grass will be cut every 10 working days during the cutting season (March - Oct)
 - b. Leaves will be cleared once a year at the end of leaf fall
 - c. Shrub beds will be maintained twice a year
 - d. Weed-spray contract for controlling weeds growing on all hard surfaces on our land.
 - e. Treatment of invasive species such as Japanese knotweed
 - f. Maintenance work on trees according to priority, contractors will deal with trees that are a health-and-safety hazard first. There is an inspection regime for communal areas every 3 years.
 - g. Delivery of ground maintenance estate improvement programmes, such as creating and supporting resident led greening projects such as Grow Your Own schemes and Allotments.
36. The grounds maintenance enhanced service will cost an additional £314,000 per annum which will increase the grounds maintenance service charge by 30p per week. These changes are reflected in the service charge from April 2022 and will be consulted with residents in the normal way.

Estate Improvements

37. In addition, following residents requests the following additional services will be provided from April 2022:
38. A window cleaning programme – there are 623 low rise blocks and 52 tower blocks which will receive a ‘reach and wash’ arrangement for low rise blocks and abseiling for tower blocks. The window cleaning programme will cost an additional £155,750 per annum, which will increase the Landlord Communal Service Charge service charge by an average of 10p per week.
39. Deep Cleaning Programme. This will be an annual programme of pressure washing, deep cleaning of bin chambers and gulley’s. It is proposed that these tasks are delivered in house by a small team of 3 staff. The deep cleaning programme will cost an additional £168,750 per annum, which will increase the Caretakers service charge by an average of 13p per week.
40. Consultation with tenants and leaseholders on these improvements is taking place in the normal way and will be reflected in the service charges from 2022/23.

Sheltered Housing

41. The progress of the Older Persons service modernisation programme has been adversely affected by the pandemic due to the inability to consult with residents. The savings and additional income will be achieved during the year 2022/23
42. There will be consultation with residents and community groups on a new offer for older people. The new offer will include a mix of ‘independent living’ schemes with onsite wardens and communal facilities for those with higher support needs, and a remote telecare service available to residents regardless of tenure which enables residents to remain in their home. Service charges will reflect the level of support each tenant opts to receive.
43. In the meantime, all new tenancies granted after 1 April 2019 to all existing sheltered housing schemes attract a full enhanced housing management fee.

Building Safety Team

44. From January 2022 the service will be engaging with residents for the proposed implementation of a Building Safety Management service charge. As part of the further Building Safety requirements, its essential that Enfield build a team to manage updates on regulations to ensure we are meeting the expected standards. Its proposed to create 4 new posts in the 2022/23 revenue budget to support a number of high-rise blocks in these safety measures. The estimated cost will be £192k.

45. Following resident engagement and consultation implement a service charge from 2023/24 will be proposed. This will be based on the cost of providing the Building safety service and would only be applicable to tenants and leaseholders receiving this service.

Heating Charges

46. The Council has in the region of 1,800 properties in 68 blocks of flats serviced by communal heating systems, this includes a mix of electric and gas.

Electricity Charges

47. The electricity charges are made up of two elements, the non-commodity standing charge and the non-commodity charges of delivering electricity, balancing the grid, all network costs including maintenance and development and Government taxes and levies.
48. The UK is currently in one of the most unpredictable and unprecedented times in history where both Covid-19 and Brexit causing volatility in equity, commodity and energy markets. Energy wholesale market prices reached records highs, with gas and electricity prices increasing on average by 60-100%. Since September, market prices across summer and winter have been rising across gas and electricity. This has resulted in a proportionate rise in the forecasted price movement across the varying baskets. With the start of 2022 looking to be equally volatile as the end of 2021, the market has seen a decrease in market prices, although they are still higher than average.
49. LASER (energy procurement consultants) is continuing to actively hedge future energy volumes to ensure we mitigate the risk as much as possible. The current Housing energy contract was secured prior to these significant increases, with current prices secured until September 2022. As the energy contract is secured until September there will be a part year increase in the electricity charges. This has been calculated as an average over the year and will see a 5% increase in charges from April 2022.
50. With the market being so volatile, there will be a mid-year review following the contract renewal in September 2022. At this point we will consult with residents to ensure they are up to date with the latest market data. The charge for 2022/23 is secured at 5%, however we want to keep tenants informed for potential rises from 2023/24.
51. It should be noted that whilst prices are increasing, Enfield Council have in the past made significant savings on energy through consortium purchasing via LASER (part of Kent County Council) who are experts in energy procurement. They purchase energy for many public bodies enabling Enfield to benefit not only from their expertise but also from cost and price reductions gained through bulk buying. This continues to be the case even in a market with this level of uncertainty.

Gas Charges

52. Similarly, gas forecasts are rising by 10 to 20%, as the largest portion of the delivered cost is made up for the commodity element. This is the main 'negotiable' cost of energy and is dependent on the wholesale market price of gas at the point energy is purchased
53. The current contract is secured until September 2022, with great uncertainty in the market for the following contract period. Due to the volatile market the proposed increase from April 2022 will be 8%.

Other Charges

54. The gas standing charge and fuel oil will increase by 8%.

Assistance for Residents

55. The cost of living has gone up and the service is aware many people are finding it difficult to make ends meet, with food and household bills rising and money not going as far as it used to.
56. A combination of the coronavirus pandemic, inflation, and national insurance tax increases has raised the cost of living and put severe pressure on household budgets.
57. The Council is committed to helping residents who are struggling to pay their bills and have published a wide range of advice on the Council's website. This includes guidance and support to help residents paying their bills including Council Tax, claiming benefits, debt management and access help with food, fuel and other essentials, if required. In addition, the Rent Income Team will be able to offer advice and help arrange payments plans where necessary.

Garages

58. The garages which are let to Council tenants, leaseholders and private tenants are standard lock-up. A non-Council tenant premium is charged on all lets to private tenants, and any Council tenant or leaseholder who rents more than 2 garages.
59. The garage charges have increased by an average of 3.1% in 2022/23, the charges are as follows:

	2021/22 Weekly rent per week	2022/23 Proposed Weekly rent per week	Change
	£	£	%
Standard lock-up Garages	13.50	13.90	3.0%
Private Garage Rental	26.50	27.30	3.0%
Private Garage Rental Concessionary	21.00	21.60	2.9%
Garage Storage	26.50	27.30	3.0%
Garage Storage Concessionary	21.00	21.60	2.9%

Parking Bay	8.40	8.70	3.6%
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Community Halls

60. The HRA Community Halls have increased by an average of 3.1%, the charges are as follows:

Community Hall Hourly Rate	2021/22 Charges	2022/23 Proposed Charges	Change
	£	£	%
Private Hire	32.50	33.50	3.07%
Charitable	19.50	20.10	3.10%
Council Housing resident	24.00	24.70	2.93%
Enfield resident rate	26.50	27.30	3.02%

61. A review of the Community Halls policy is in progress with a potential change in the charges to a more flexible approach.
62. Currently the Community Halls do not have a deposit system in place for ad hoc hirers. Due to the halls being left in a poor condition, with additional costs incurred due to cleaning requests/damage/or officer time for late locking, it is proposed to introduce a deposit charge to all ad hoc hirers of £100. The following steps will be introduced:
- Payment will be made by card and refunded to the card.
 - Any confirmed damage or untidiness will result in the deposit being lost and that money being used to cover the costs associated
 - Deposit refund process introduced so that hirers are refunded within 5 working days if the hall is handed back on time, in the appropriate condition
 - Hire agreement amended to include section on when deposit will be deducted/lost
 - Appeal process for lost deposits to be included in hire agreement
 - This process will be managed by the Housing Management team

Leaseholder Service Charges

63. The administration and management charge is a flat rate of £4.17 per week, added to the cost of services to cover the preparation of estimates and actual costs, billing consultation on repairs and improvement works and estate management.
64. At the end of each financial year, the actual cost is determined, and an appropriate adjustment made to the charge.
65. The cost of administration and management for 2022/23 is estimated at £1.108m and it is therefore recommended that the charge is set at £217.09 per leasehold unit to cover this cost.

66. The charges below will vary for our 4,911 leaseholders depending on the services they receive. Adjustments will be made mid-year to reflect actual charges.

	Charge per week 2021/22	Proposed charge per week 2022/23	Change per week	Change per week
	£	£	£	%
Administration & Management Charge	4.06	4.17	0.11	2.7%
Caretaking Service	From 2.28 to 6.07	From 2.37 to 6.32	From 0.09 to 0.25	Average 4.0%
Communal Electricity	From 0.29 to 3.54	From 0.35 to 4.25	From 0.06 to 0.71	Average 20%
Concierge	10.72	10.97	0.25	2.3%
CCTV	From 0.16 to 2.04	From 0.17 to 2.10	From 0.01 to 0.06	Average 2.9%
Grounds Maintenance	1.96	2.28	0.32	16.3%
Paladin Bins	0.58	0.6	0.02	3.5%
<i>INSURANCE</i>			0.00	
1 Bed	4.21	4.59	0.38	9%
2 Bed	4.96	5.41	0.45	9%
3 Bed	5.98	6.52	0.54	9%
4 beds	6.5	7.09	0.59	9%
Flat Repairs (Annual Charge)	0.02	0.02	0.00	0.0%
Ground Rent (Annual Charge)	0.19	0.19	0.00	0.0%
Estate Charge (Annual Charge)	0.25	0.25	0.00	0.0%

Insurance

67. It is anticipated there will be an increase of 9% in property Insurance due to higher costs for building materials and inflation.

Under Occupation Project

68. This three year project started in 2020/21 to ensure best use of Council stock by moving tenants that are under-occupying Council Homes into suitably sized accommodation thereby freeing up larger accommodation. There was an increase in the incentive and flexible bespoke packages including support that meet the needs of tenants.
69. The charges remain at the 2021/22 approved levels, with an additional incentive for four bedroom or larger properties.
70. The incentives offered are as follows:
- £1,250 for giving up 1 x room
 - £2,000 for giving up 2 x rooms

£2,500 for giving up 3 x rooms

£3,000 for giving up a four bedroom or larger property

2022/23 Revenue Budget

71. The table below sets out the base budget for 2022/23 compared to 2021/22 figures.

Category	2021/22 Budget	2022/23 Proposed Budget	Reason for differences
	£'000	£'000	
Bad Debts	605	610	Inflation
Corporate & Democratic Core	134	138	Inflation
Cost of Capital	10,641	10,983	Increase in interest payments due to an increase in level of debt to support capital programme
Depreciation	11,067	11,283	Increase in depreciation to reflect current market
Interest on Balances	-380	-186	The amount of interest receivable is decreasing - reduced interest rates
Rent Rates and other Charges	676	592	Decrease in council tax on regeneration void properties charges due properties demolished
Rents Dwellings	-58,871	-60,495	Rent increase and stock movements - reduced stock from RTB's, increased stock from new builds/acquisitions
Rents Shops-Commercial	-2,343	-2,262	Removal of aerial on block – reduced income
Repairs and Maintenance	15,826	15,994	Contract inflation
Supervision & Management General & Special	21,746	22,255	2% estimated salary pay award, increase in energy costs
Leaseholder Service Charges	-5,016	-5,075	Inflation
Self-Financing Contribution	7,016	7,029	Balance the Housing Revenue Account
Non-Dwelling Rents	-1,102	-866	Reduction in garage income - reflects actual lettings
Grand Total	0	0	

Efficiency Savings

72. For the Business plan to remain sustainable, efficiency savings are required. A 5% efficiency saving in Management and Maintenance has been built in to the HRA Business plan until 2024/25. This will generate additional revenue of circa £1m per annum. The efficiencies will be partly achieved by:
- a. The introduction of a new IT system (Civica CX), this is expected to make long term savings in staff costs including in Enfield Repairs Direct (ERD) which is currently incurring additional costs involved manual data entry
 - b. Insourcing the repairs service, with annual savings ongoing
 - c. Income generation from delivering repairs to a wider range of internal customers
 - d. Housing management service restructure – completed in 2021/22 with full year savings realised for 2022/23
 - e. Increased income from Community Halls hire
73. The service continues work on a delivery plan to meet efficiency targets to deliver future savings. These efficiencies will assist in ensuring the Business Plan remains sustainable.

Capital Finance and Prudential Code

74. The Prudential Code for Capital Finance requires the authority to have regard to affordability, prudence and sustainability when considering its capital investment plans and to set and keep under review a range of prudential indicators. In December 2017 the prudential code changed, and it is recognised that indicators of affordability are best determined in the light of local constraints around precepts and ring-fenced and statutory funds such as the HRA and Police Fund. Authorities are encouraged to use local indicators that reflect how capital finance is permitted to be financed locally. For example, for those authorities with an HRA, the ratio of financing costs to net revenue budget should be calculated within the HRA ring-fence and an impact on rents calculated.
75. The General Fund Budget report for 2022/23 along with the Treasury Management report elsewhere on the agenda sets out the background to the prudential code and shows the indicators for the HRA and the General Fund.
76. The financial framework continues to ensure the Business plan remains financially viable and within affordable limits. This framework enables us to assess future investments decisions. The metrics are Interest Cover Ratio (ICR) and Loan to Value (LTV).

Capital Programme

77. The table below sets out the overall capital expenditure planned for the next 10 years. These budgets are aligned with the 10-year Capital Strategy report. The programme is broken down into three areas detailed below:

Capital Programme	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2031/32	TOTAL
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	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Investment Programme	54,574	57,946	15,312	14,539	14,539	68,194	225,104
Estate Regeneration Programme	6,239	1,051	982	763	633	0	9,668
Development Programme	72,110	158,518	79,694	113,948	82,598	379,251	886,120
Total HRA	132,923	217,515	95,989	129,250	97,770	447,445	1,120,892

78. The 10-year capital programme totalling £1,121bn will be funded as follows:

Financing	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 - 2031/32	TOTAL
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
External Grants & Contributions	17,347	9,139	21,140	13,122	34,927	116,844	212,518
Capital Receipts	21,206	56,591	60,704	39,589	17,363	128,826	324,279
Major Allowance Repairs	11,744	12,062	14,145	14,539	14,964	68,195	135,648
Earmarked Reserves	21,427	6,923	0	0	19,517	48,581	96,447
Borrowing	61,200	132,800	0	62,000	11,000	85,000	352,000
Total	132,923	217,515	95,989	129,250	97,770	447,445	1,120,892

Investment in Stock

79. Work continues on the Asset and Sustainability strategy. Once finalised the affordability will be ascertained against the business plan and the new strategy will come forward to Cabinet for approval with a revised 10-year investment programme, aligned to the new strategy
80. A significant amount of re-profiling was identified in 2021/22, mainly due to the knock-on effects of delays in year for 2020/21 linked to Covid-19. There have been additional delays linked to extraordinary inflationary increases in building costs and labour shortages associated with global market forces during 2021 and ongoing, leading to lengthy negotiations taking place with suppliers.
81. In line with the Better Council Homes programme, the asset management strategy drives investment in the Council's housing stock; reducing carbon, achieving the Decent Homes Standard and maintaining this and addressing building safety risks are Council priorities.
82. A revised programme has been included within the updated 10-year capital programme to reflect the impact of these changes. This programme will deliver the following:
- Maintain and increase adherence to decent homes standards
 - A risk-based programme of building safety works across high rise and specialised housing units
 - A reduction in lift outages, which cause inconvenience to residents

- Prevention of water leaks and penetration, which can lead to mould growth, affecting resident's health and wellbeing
- Improved building performance, reducing energy consumption and fuel bills

83. The 10-year capital programme is as follows:

Investment Programme	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2031/32	TOTAL
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Asset-Led Works	4,497	108	0	0	0	0	4,605
Asset-Led Works: Cambridge Road West	4,632	118	0	0	0	0	4,750
Asset-Led Works: Upper Edmonton	719	0	0	0	0	0	719
Total Asset-Led Works	9,848	226	0	0	0	0	10,074
Demand-Led Works	1,050	850	0	0	0	0	1,900
Demand-Led Works: Aids & Adaptations	1,300	1,500	0	0	0	0	2,800
Total Demand-Led Works	2,350	2,350	0	0	0	0	4,700
Fire-Led Works	26,273	30,357	379	0	0	0	57,009
Stock-Condition-Led Works	16,103	25,013	14,933	14,539	14,539	68,194	153,321
Total HRA	54,574	57,946	15,312	14,539	14,539	68,194	225,104

Stock Condition Led Works

84. This budget will fund decent homes improvement works, delivered through various contracts across the borough. These include boiler upgrades, kitchen, bathroom and electric replacements, roofing renewals, window replacements and external wall insulation applications.
85. These works will improve building insulation and reduce heat loss, which will create savings in energy costs to residents.
86. The Council also working on an application for Social Housing Decarbonisation Funding (SHDF) in a bid led by Barking & Dagenham Council for EnergieSprong. Deep retrofitting to net zero carbon. If successful, this will receive match funding to the value of circa £2million.

Asset Led Projects

87. This aspect of the programme is based upon the delivery of decency and safety driven improvement works to schemes where blocks in close proximity have been grouped together and procured. These schemes are all live and include; Hertford Road, Upper Edmonton and Cambridge Road West. Upper Edmonton is due to be completed by early summer 2022. Hertford Road and Cambridge Road West are currently in the mobilisation stage and are expected to complete before the end of the financial year 2022/23.

88. These decency works will delivery:
- Roof renewals
 - Door replacements, which also improve the fire safety of our buildings
 - Communal area works to blocks
 - Communal electric works
 - Replacement windows

Demand-Led Works

89. This budget funds the Council's adaptation works to housing properties and includes budget for conversion works to Dover House Surgery, which is being converted to residential, structural repairs and a cycle storage scheme. These schemes are demand led so there is a small risk that reduced demand will result impact the spend profile in any given year.

Fire-Led Projects

90. The building safety improvement projects include:
- replacement flat entrance and communal area fire doors
 - fire suppression system (sprinklers) installations
 - fire/smoke alarm upgrades
 - compartmentation works
 - communal Class O (fire resistant) redecorations
 - infrastructure replacement works such as soil stacks and electrical submains
 - conversion of individual gas boilers to district heating at Walbrook House
 - cladding remediation works
91. Projects currently live include Bliss House and Purcell House and Brittany House, which are planned to complete in the 2022/23 financial year. Channel Islands, which is planned for completion summer 2023 and Walbrook House, which is expected to be completed early in 2025. Procurement is currently underway for five additional projects, which are planned to commence in 2022 including:
- FRA package 1. Gainsborough; Bonington, Constable & Brookbank
 - FRA packages 2/3. Scott & Bridport / Jackson & Swinson
 - FRA package 4 Exeter and Kettering Road
 - FRA package 5. Shropshire & Cheshire Hereford & Leicester
 - Constable and Bridport cladding remediation works

Social Value

92. The contracts awarded will deliver the following social value outcomes:
- Apprenticeships
 - School placement/ work experience placements, with targeted recruitment of BME and disabled school leavers
 - DIY skills workshops for residents
 - Greening and sustainability projects
 - A commitment to employ Enfield residents

- A reduction in carbon generated from the Council
- 100% recyclable waste target
- Resident energy awareness programmes to address energy consumption and fuel poverty.

93. All Social Value outcomes will be captured via the Social Value Portal, using the Council Housing social value model and will account for 10% of the tender evaluation score.

Development Programme

94. During 2021/22 the new homes programme experienced the same challenges outlined on the investment programme section.

95. The mid-year business plan review was completed based on the latest market data and the plan was updated and approved in December Cabinet (KD5342). This approved an updated plan including the latest programme of pipeline schemes which will deliver the Council Housing new homes programme over the next 14 years.

96. The main changes to the underlying assumptions included in the mid-year update are summarised below:

Hurdle Criteria	Current Approved	Revised Approved
Build cost per unit	£300k new build £450k estate regeneration	£400k new build £450k estate regeneration
Net Present Value (NPV) – cashflows include inflation assume discount rate of 3.5%	-£50k per unit	-£60k per unit
Internal rate of return (IRR)*	3.5%	3.5%
Repayment period	40 years	50 years

97. The increased build cost per unit is the most significant change to the programme. The previous programme included an average build cost of £300k per affordable unit but this has increased to £400k per unit based on current market conditions. This is a short-term measure and will continue to be reviewed annually based on market conditions with the aim of driving this downwards.

98. Efficiencies in design will continue to be driven as over the full term of the HRA Business Plan, direct development cannot be sustained at that rate and therefore the development team will be expected to deliver schemes under those thresholds through initiatives such as the MMC (Modern Methods of Construction) buyer's club.

99. The Council is in receipt of GLA grant under different programmes. Homes funded through the GLA's Building Council Homes for Londoners programme will be completed by March 2024.
100. The next tranche of the programme, for which the Council has secured an allocation of roughly £167m for the GLA's Affordable Housing Programme 21-26, includes delivery of approximately 2,000 homes through the regeneration of Joyce & Snell's estates from March 2023, the delivery of 120 homes from March 2024 through use of modern methods of construction (MMC) secured through a buyer's club with Barking, Waltham Forest, Newham and Haringey.
101. Following the Cabinet decision in September 2020 we have been working up the proposals for Joyce and Snells with a view to producing a viable offer to residents that will ensure that they benefit from the regeneration of the area. A ballot was undertaken in 2021 which saw an 85% turnout of which 78.5% voted yes for change. The HRA business plan has been updated based on the financial modelling agreed at Cabinet. The masterplan is being developed and will be submitted this year. This continues to be an evolving process with a range of considerations including viability, commercial strategy and resident engagement all feeding into it.
102. Overall, in this period, the programme will deliver over 1,800 affordable and social rent homes and around 1,200 homes for shared ownership and sale (a projected gross income of over £500m). The post 2026 GLA funding round will target the funding to deliver the 3,500 homes programme.
103. The table below details the schemes on site and the future programme budgets:

Development Programme	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2031/32	TOTAL
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Development Programme: future schemes	32,994	70,725	26,550	59,501	35,313	110,343	335,426
Development Programme: Bury Street	9,636	438	0	0	0	0	10,074
Development Programme: Electric Quarter	1,291	0	0	0	0	0	1,291
Development Programme - Joyce & Snells	6,756	38,410	43,144	52,721	47,285	268,908	457,224
Development Programme: Reardon Court	10,069	18,231	0	0	0	0	28,300
Development Programme: Upton & Raynham	11,254	30,714	10,000	1,726	0	0	53,695
Development Programme: Gatward/Newstead & Maldon	110	0	0	0	0	0	110
Total Development Programme	72,110	158,518	79,694	113,948	82,598	379,251	886,120

104. New build development units will be charged at London Affordable Rent levels as part of Building Council Homes for Londoners (BCHL) GLA funding programme and social rents will be charged as part of the new 2021-26 Affordable Homes (AHP) GLA funding Programme. The social rents will be based on the 1999 valuation of the property and will be calculated on a formula rent basis.

Estate Regeneration

105. This programme, which includes the Alma Estate, New Avenue and Ladderswood schemes, is investing in large scale phased regeneration for delivery of in-demand affordable housing as well as unlocking new homes for low cost home ownership for Enfield residents.

106. The three partnership regeneration schemes are in delivery and work continues to ensure the best possible scheme outcomes are delivered. Progress has been made across all three sites, including the successful approval for additional homes on Alma and New Avenue

107. Over the next year these schemes will deliver 706 starts on site and build a new community centre on the Alma Estate.

Estate Regeneration Programme	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28 to 2031/32	TOTAL
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Estate Regeneration: Alma Towers	5,679	736	648	653	633	0	8,348
Estate Regeneration: Ladderswood	250	110	110	110	0	0	580
Estate Regeneration: New Avenue	311	205	224	0	0	0	740
Total Estate Regeneration	6,239	1,051	982	763	633	0	9,668

RTB One for One Replacement Receipts and Expenditure

108. The Government has published new legislation on the use of RTB receipts and the following changes have been made with effective from 1st April 2021:

- a. For new and existing receipts, the timeframe local authorities to spend Right to Buy receipts has been extended from 3 to 5 years
- b. Increase on the cap on the percentage cost of a new home that local authorities can fund from Right to Buy receipts from 30% to 40%
- c. Introduced a cap on the use of Right to Buy receipts on acquisitions to help drive new supply.
- d. Allow receipts to be used for shared ownership and First Homes

109. In the next 5 years receipts will be used to fund development and regeneration schemes.

110. Below is the proposed programme, this could be subject to change as there may be delays or unavoidable changes within the development schemes.

111. In order to continue to spend Right to Buy receipts approval is required for the proposed 5-year programme outlined below:

RTB receipts allocation - 40%	2022/23	2023/24	2024/25	2025/26	2026/27	Total
	£000	£000	£000	£000	£000	£000
New Avenue	4	4	4	0	0	12
Exeter Road phases 1-3	5,816	5,981	1,599	1,453	0	14,849
GLA Programme	18,676	19,581	3,948	0	1,328	43,533
Total	24,496	25,566	5,551	1,453	1,328	58,395

HRA Balances

112. The estimated position on balances is set out below:

	Balance at 31/03/2021	Movement in 2021/22	Estimated balance as at 31/03/22
	£m	£m	£m
HRA General Balances	9.94	0.24	10.18
Repairs Fund	10.06	0.11	10.18
Major Repairs Reserve	6.061	-0.12	5.94
Capital Reserve	4.98	11.50	16.48
Insurance Reserve	0.32	0.00	0.32
Total Earmarked reserves	31.37	11.72	43.10

London Housing Consortium

113. The Council has been a Constituent Authority of LHC – formerly the London Housing Consortium – since September 2016 and has nominated Elected Members to serve on the LHC Joint Committee.

114. The rationale for joining the LHC Joint Committee was to work collaboratively with other London Councils to improve the procurement of housing and construction products and services. The London Housing Consortium was set up for that purpose in 1966. Up until recently LHC was one of the few providers of these services. In addition, the Council benefitted annually from a share of LHC's surpluses.

115. Much has changed in recent years. The Council no longer relies on LHC for procurement solutions, preferring instead to use its own procurement capability; main contractor services; alternative procurement consortia sometimes including LHC.

116. As an organisation, LHC itself has expanded its operations widely throughout Great Britain servicing around 300 public sector organisations. LHC surpluses

are now shared widely across the country resulting in a reduced annual return for the Council.

117. As a Constituent Member of LHC the council receives an annual community benefit fund from LHC surpluses (conditional on attendances by Elected Members at LHC meetings) of £10,000. It is envisaged that in a new LHC corporate entity such funds would continue to be available for former LHC Constituent Authorities.
118. The expansion of LHC's services has also added risk to the LHC Joint Committee, particularly relating to staffing and employer liability, arising from:
 - a. The widespread geographic nature of LHC operations
 - b. The widespread geographic location of LHC staff and offices
 - c. The rapid growth of the LHC workforce
119. Members of the LHC Joint Committee recognised that the dynamic nature of LHC as a commercial enterprise is also at odds with the democratic and regulatory processes that are required by local authorities. It is felt that LHC would benefit from having more autonomy around:
 - a. Governance and organisational design
 - b. Job design and reward
 - c. Future provision of pension
 - d. Financial modelling and risk management.
120. Consequently, the members of the LHC Joint Committee asked for a review of LHC governance arrangements which concluded that the LHC Joint Committee be disbanded, and a new corporate entity established by LHC. Enfield supports this process

Safeguarding Implications

121. There are no safe-guarding implications

Public Health Implications

122. Good quality housing plays an essential role in improving public health and wellbeing.
123. Managing council rental income and mitigating welfare reform is an important part of avoiding debt issues and contributes to the general well-being of residents

Equalities Impact of the Proposal

124. The HRA 30-Year Business Plan supports the delivery of high quality services that promote equality and values diversity. Please see Appendix 2 which provides Equality Impact assessment.

Environmental and Climate Change Considerations

125. There are no Environmental and Climate Change considerations

Risks that may arise if the proposed decision and related work is not taken

126. The Grenfell fire in 2017 and the Government led Building Safety programme has placed a significant burden on the HRA and additional funding has had to be identified and bought forward to finance reactive cladding works and large scale door replacement programmes, following the release of advice notes and changes to Approved Documents.
127. The Council is considering its building safety programme in preparedness for the forthcoming regulatory framework to ensure the risk of non-compliance at implementation, is mitigated.
128. The full financial requirements and implications associated with the new primary legislation are still to be fully understood as the findings of the 2019 consultation and scope have not been confirmed.
129. A final bill is expected shortly. As such financial requirements in this area, will need to be kept under review.
130. There is always a risk that at any point during the 30-year Business Plan the Government proposes a plan of action it intends to take which could influence the HRA balance. It is imperative that, at the point where there is reliable knowledge that a change is likely to occur, a full review must be taken to allow mitigation against all potential risks.

Financial Implications

131. The Local Government Act 2003 requires the Chief Finance Officer to report on the robustness of estimates and the adequacy of proposed financial reserves. The 2022/23 HRA estimates have been prepared considering the following:
- The estimated impact of inflationary pressures. Allowance has been made for cost increases over and above the general rate of inflation where these are known;
 - The estimated impact of increasing demands on resources where these are unavoidable;
 - The estimated impact of underlying costs pressures, evidence by financial monitoring reports in the current year;
 - An assessment of key risks and uncertainties; and
 - The impact of borrowing requirements on the 30 year business plan.
132. It should be noted the HRA Business Plan remains affordable and sustainable, with a robust budget and prudent balances.

Legal Implications

133. Local authorities have the ability to set their own rents under section 24 of the Housing Act 1985. The charge must be reasonable for the tenancy or

occupation of their premises. Section 24 also requires local authorities to periodically review rents and make such changes as circumstances may require. The section confers a broad discretion as to rents and charges made to tenants.

134. Under Section 76 of the Local Government and Housing Act 1989, the Council is required to prepare proposals in January and February each year relating to the income of the authority from rents and other charges, expenditure in respect of repair, maintenance, supervision and management of HRA property and other prescribed matters. The proposals should be based on the best assumptions and estimates available and should be designed to secure that the housing revenue account for the coming year does not show a debit balance.
135. The Council is a local housing authority within the meaning of the Housing Act 1985 and is specifically empowered to provide housing accommodation, either by erecting houses, or converting buildings into houses on land acquired by it for the purposes of Part 2 of the Housing Act, or by acquiring houses.
136. Right to buy receipts are capital receipts within the meaning of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 and those Regulations generally require the Council to pay the amounts received to the Secretary of State on a quarterly basis. However, pursuant to section 11(6) of the Local Government Act 2003, the Council may enter into an agreement with the Secretary of State to retain the whole or part of a capital receipt. An agreement was entered into by the Council in 2012 which specifies circumstances in which the Council is not required to pay specified capital receipts to the Secretary of State.
137. Pursuant to Part III, Schedule 6 of the Housing Act 1985, repairing obligations are placed on the Council as Landlord in respect of properties held on leases after having been sold under the Right to Buy scheme. The Council's standard form of residential Lease with leaseholders further sets out these obligations.
138. Leasehold service charges are required to be transparent and reflect the actual cost of the services incurred in accordance with the Landlord and Tenant Act 1985.
139. The Council's Lease entered into with Leaseholders require the Leaseholder to obtain consent for any alterations they wish to make to their home. The Landlord and Tenant Act 1927 is the statutory framework governing such requests which are not to be unreasonably withheld.
140. Leasehold service charges are required to be transparent and reflect the actual cost of the services incurred in accordance with the Landlord and Tenant Act 1985.
141. The Council is required to act in accordance with the public sector equality duty under the Equality Act 2010 and have due regard to the duty when carrying out its functions, which includes making decisions in the current context. The Council also has a duty to show they have consciously addressed their mind to

carrying out an Equality Impact Assessment (which includes any decision to increase or introduce charges to tenants).

Workforce Implications

142. Additional resources to deliver capital programme and comprehensive developments may be a requirement however a restructure of the services is being undertaken to ensure the team's capacity to deliver projects.

Property Implications

143. The majority of the proposals in this report relate to HRA properties, and the implications for these are to be found throughout the report.

144. There are some property implications that relate to corporate properties. These are the halls and youth centres that are managed under the banner of "Community Spaces" in tandem with the HRA community halls. For consistency, the hire charges for the corporate properties will be increased in line with the HRA properties. The charging arrangements for both corporate and HRA halls will be harmonised as part of the review of the charging policy that is identified in this report's proposals.

Other Implications

145. There are no other implications

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Appendices

Appendix 1 30-year Revenue Budget

Appendix 2 Equality Impact Assessment

Appendix 1

HRA Revenue Budget 30 years	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	20-31	31-32	32-52
	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m	£m
Dwelling Rents	57.7	61.2	66.9	70.7	74.5	78.5	81.2	85.6	87.2	89.7	2,254.0
Service Charges Tenants	3.4	3.5	3.7	3.8	3.9	4.1	4.2	4.4	4.5	4.6	115.0
Service Charges Leaseholders	5.0	5.1	5.3	5.4	5.5	5.6	5.7	5.9	6.0	6.1	151.0
Voids	-0.6	-0.6	-0.7	-0.7	-0.8	-0.8	-0.8	-0.9	-0.9	-0.9	-23.3
Non Dwelling Rents	3.3	3.5	3.6	3.7	3.7	3.8	3.9	4.0	4.0	4.1	102.0
RTB Administration Income	0.2	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	1.0
Total Income	69.0	72.9	78.9	82.8	86.9	91.2	94.3	99.0	100.8	103.6	2,599.6
Responsive Repairs	15.5	16.1	16.8	17.8	18.3	18.9	19.4	20.0	20.4	20.9	523.6
Supervision And Management	15.5	16.0	16.7	17.7	18.2	18.8	19.3	19.9	20.3	20.2	508.8
Special Services	7.0	7.3	7.5	7.6	7.8	7.9	8.1	8.2	8.4	8.6	212.6
Rents Rates Taxes & Other Charges	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	11.8
Bad Debt	0.6	0.6	0.7	0.7	0.8	0.8	0.8	0.9	0.9	0.9	22.4
Depreciation of Fixed Assets Total	11.3	11.7	12.5	13.0	13.6	14.2	14.7	15.5	15.7	16.1	408.2
Expenditure	50.5	52.3	54.7	57.5	59.4	61.2	62.9	65.1	66.3	67.3	1,687.6
Net (Cost) Of Services	18.5	20.6	24.2	25.3	27.5	30.0	31.3	33.9	34.5	36.3	912.0
Loan Interest	11.0	15.6	15.6	17.8	18.2	19.2	19.2	19.1	19.1	19.1	361.3
Interest Income	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.3	-0.3	-0.3	-0.3	-10.8
Notional Cash Interest	0.0	-0.2	-0.1	-0.2	-0.2	-0.2	-0.3	0.0	0.0	0.0	-54.9
Capital Account Adjustments	10.8	15.2	15.3	17.3	17.7	18.8	18.7	18.8	18.8	18.8	295.7
Net Operating Income / (Expenditure)	7.7	5.4	8.9	7.9	9.8	11.2	12.6	15.1	15.7	17.5	616.3

Appendix 2

SECTION 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	HRA Budget 2022/23, Rent Setting and Business Plan Update
Lead officer(s) name(s) and contact details	Joanne Drew/Matt Bowmer
Team/ Department	Council Housing
Executive Director	Sarah Cary/Fay Hammond
Cabinet Member	Councillor Needs/Councillor Maguire
Date of EqIA completion	2/2/2022

SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

Any local housing authority that owns 200 or more social dwellings are required to account for them within their Housing Revenue Account (HRA). How social housing rents are set is determined by government.

Social housing rent increases in Enfield for 2022/23 are recommended to be 4.1% - this is due to an unprecedented rise in the Consumer Prices Index (CPI). CPI in the context of rent increase is the Consumer Price Index rate published by the Office for National Statistics for September of the preceding financial year ie September 2021 for rent setting in 2022.

This increase follows four years of rent reduction in social housing rents; from 2016/17 the government imposed a 1% rent reduction in social housing. This meant that tenants starting with a rent of £120 per week in 2015/16 ended up with a rent of £115.27 in 2019/20 a reduction of £4.73 per week - this is in contrast to private sector rents which increased on average by 18.2% between 2014-2021, an average of £200 per month.

In 2020/21 the Government set out a five-year rent framework which provided for rents to increase by CPI + 1%. In September 2021 CPI was 3.1%; the rent increase for 2022/23 is therefore - 3.1% +1% = 4.1%.

Although the rent increase will negatively impact residents, it is the decision the Council must follow in line with government guidelines. The previous period of rent reductions have affected capacity in the Business Plan to fund services and investment in homes in Enfield and therefore it is a necessary decision.

The previous four-year 1% reduction had a negative impact on the Enfield HRA Business Plan with reduced income of c. £300m over the 30-year plan, this could have been invested into our stock or new build programme.

According to the Department for Business, Energy and Industrial Strategy's (BEIS), generally material prices were 10.2% higher in May 2021 than in May 2020. However, key construction materials such as fabricated steel and plyboard have increased by 38.1% and 29.8% respectively.

SECTION 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

It is estimated that the rent increase will negatively impact all local residents, regardless of their age.

As at 1 October 2021 there are 2756 council tenants claiming Universal Credit with the housing cost and 4737 council tenants in receipt of Housing Benefit; this means that for 7,493 – 73% - of tenants their full housing cost is met as long as they do not under occupy their home

Older People

There are currently approximately 42,000 people aged 65 and over living in Enfield, making up around 13% of the total population. These figures are set to increase by 23% to 52,500 people aged 65 and older by 2025.

Older residents are more likely to under occupy their home; those claiming Housing Benefit, living in a social rented sector tenancy, aged between 16 and pension age will be affected by a reduction in the amount of housing benefit paid to them and the rent increase.

Families, Children and Young People

Around 9% of council tenants are under 35 years of age.

Enfield has relatively high proportions of children and young people under the age of twenty – higher than both London and England averages. According to official Department for Work and Pensions statistics (2019/20) 18% of children under 16 in Enfield live in low-income families.

Larger families may be affected by the benefit cap – the cap on the amount of benefit that working aged people can claim – in Greater London the current caps are:

	Monthly amount	Weekly amount
Families w children & couples -	£1916.67	£442.31

Mitigating actions to be taken

Although the rent increase will negatively impact residents, it is the decision the Council must follow in line with government guidelines. The previous period of rent reductions have affected capacity in the Business Plan to fund services and investment in homes in Enfield and therefore it is a necessary decision.

The council proactively supports tenants who are under occupying their home to move to a smaller, more affordable home; this includes access to pan-London and

National mobility schemes. Grants are available for residents who choose to move to a smaller home as well as help with removal costs.

Work is ongoing to support residents with the increasing cost of living. The council has developed resources and training for housing officers to help signpost residents to employment and skills support initiatives. A Route Map resource has been developed - a page on the Enfield Council Website which provided some information around employment support. This currently sits within Tenant Information section of the Council Website. www.enfield.gov.uk/jobsandtraining .

An article was also designed for Housing News, the publication sent to all council tenants and leaseholders, publicising some key organisations and the route map itself, and encouraging residents to speak to Housing Officers for further advice.

The Council is committed to helping residents who are struggling to pay their bills and have published a wide range of advice on the Council's website. This includes guidance and support to help them manage paying their bills including Council Tax, claim benefits, manage debt and access help with food, fuel and other essentials if required. In addition, the Rent Income Team are able to offer advice and help arrange payments plans where necessary.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

It is estimated that the rent increase will have a negative impact on all residents regardless of whether they have a disability or a disabled member of their household.

10% of Enfield council tenants have a declared disability.

Estimates suggest that nearly 25% of the working age population have a disability. The impact of rent increase on tenants with a disability or who have a disabled member of their household reflect both negative impacts of the welfare benefit system, and access to employment opportunities for disabled people.

Mitigating actions to be taken

Although the rent increase will negatively impact residents, it is the decision the Council must follow in line with government guidelines. The previous period of rent reductions have affected capacity in the Business Plan to fund services and investment in homes in Enfield and therefore it is a necessary decision.

Housing staff working with tenants have received training on welfare benefits and are able to identify and signpost people who may not be in receipt of all benefits available to them.

The work developed to assist residents with the increased cost of living includes career support initiatives available specifically to people with special educational needs, disabilities or mental health challenges.

- IAPT NHS - a free NHS, psychological therapy service -offers a range of support, including talking therapies, cognitive behavioural therapy and support and advice around employment and mental health.
- There are a range of other national and local services in Enfield who can support tenants with mental health challenges.
- London Working or the Work and Health Program, who can provide support for individuals with significant barriers to help them into work and training

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Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

We do not have robust local data with regard to gender reassignment, however GIRES estimates that around 650,000 people in the UK, 1% of the population, are estimated to experience some degree of gender non-conformity. If GIRES' estimates are correct and the distribution among Enfield's population were typical of their national research, this would equate to around 3,350 individuals with some degree of gender non-conformity.

It is estimated that the rent increase will have a negative impact on all residents who regardless of whether they have undergone or are undergoing gender reassignment.

Mitigating actions to be taken

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The Council is committed to helping residents who are struggling to pay their bills and have published a wide range of advice on the Councils website. This includes guidance and support to help them manage paying their bills including Council

Tax, claim benefits, manage debt and access help with food, fuel and other essentials if required. In addition, the Rent Income Team can offer advice and help arrange payments plans where necessary.

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected

We don't record the relationship of cohabiting couples who are council tenants.

It is estimated that the rent increase will have a negative impact on all residents regardless of whether they are married or in a and civil partnership.

Mitigating actions to be taken

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Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected

We don't record data on whether or not tenants are pregnant, although 63% of tenants are female.

It is estimated that the rent increase will have a negative impact on all residents regardless of whether they are pregnant.

Mitigating actions to be taken

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reductions have affected capacity in the Business Plan to fund services and investment in homes in Enfield and therefore it is a necessary decision.

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Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected

It is estimated that the rent increase will have a negative impact on all residents who regardless of their ethnicity or national origins.

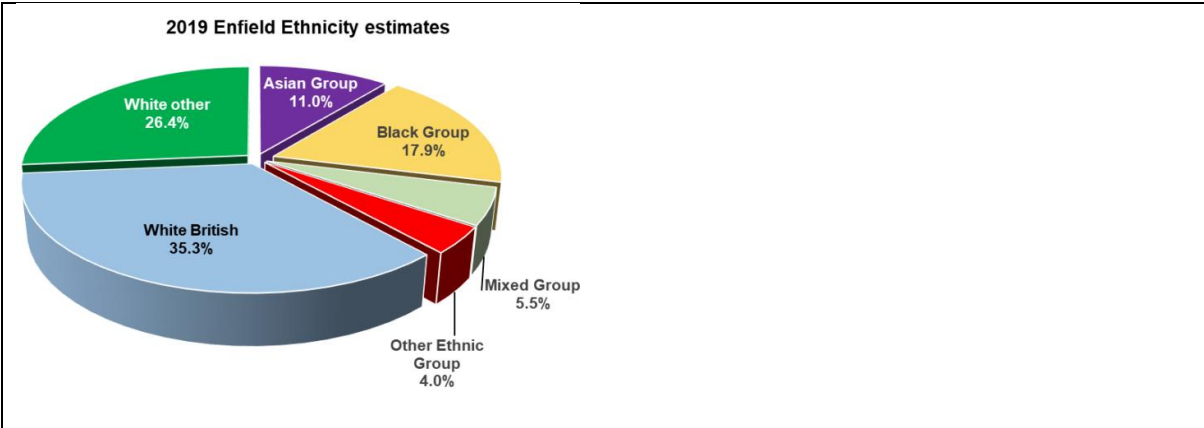
Employment opportunities are likely to be lower for people in certain race groups:

- 4% of White people were unemployed in 2019, compared with 7% of people from all other ethnic groups combined
- Black, and Bangladeshi and Pakistani people had the highest unemployment rate out of all ethnic groups (8%)
- the White Other ethnic group had the lowest unemployment rate out of all ethnic groups (3%)

It is estimated that residents from White British backgrounds make up 35.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 26.4%. Mixed Ethnic Groups account for 5.5%, Asian Groups for 11% and Black groups for 17.9% of Enfield's population.¹ 39% of the borough's population were born overseas.² National and borough wide data has been used as a proxy indicator given current gaps in the data we have for tenants and those on our housing waiting list.

Whilst ethnic diversity is one of our biggest assets, ethnic minorities experience inequality in housing, education, employment, health and criminal justice in Enfield, as is the case across the UK. This needs to be addressed.

Figure 3: 2019 Enfield Ethnicity estimates



Mitigating actions to be taken

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Religion and belief
 Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

We do not have robust data on the religion of existing tenants of Council homes or on those on our housing register which can be used to consider potential differential impact of the strategy on people of different religions – 53% of residents don't specify a religion.

Where it is specified the two largest groups represented among tenants are Christians – 28% - and Muslim – 12%.

It is estimated that the rent increase will have a negative impact on all residents regardless of their religion or beliefs.

Mitigating actions to be taken

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Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

It is estimated that the rent increase will have a negative impact on all residents regardless of their sex.

63% of Enfield's tenants are female.

Females are more likely to be single parents – 94% of single parents on Enfield's Housing Register are mothers. Females are more likely to be on lower incomes and lower paid work than men. Statistics show that in 2019 females earned on average 17.3% less than their male counterparts.

Females are more likely to be on lower incomes and lower paid work than men. Statistics show that in 2019 females earned on average 17.3% less than their male counterparts. This put females at greater risk of becoming homeless.

Households requiring a home of 4 bedrooms are more likely to be headed up by a females (mothers) rather than males.

The rent increase will impact all residents regardless of whether they are females or males. However, employment opportunities and income averages are lower for females and therefore they may be at greater risk of struggling to pay the proposed rent increase.

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The Route Map resource which provides some information around employment support, includes specific training and support available to women which includes:

- Smart Works, a UK charity that provides high quality interview clothes and interview training to unemployed women in need.
- Enfield Women's Centre who can offer advice, information and training to women who would like to build their skills and embark on a career. They run a range of courses throughout the year.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

There is very little reliable data on sexual orientation, however the ONS 2019 Annual Population Survey predicted that 92.1% of the UK population identified as heterosexual while 2.9% identified as lesbian, gay or bisexual.

It is estimated that the rent increase will have a negative impact on all residents regardless of their sexual orientation.

Mitigating actions to be taken

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Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Enfield is the 9th most deprived London borough and has the 11th highest rate of child poverty in the country.³ Enfield's median household income is £35,300, which is the 9th lowest of the 33 London boroughs and lower than the London average. Within the borough, there are clear differences in household income between the western and eastern parts. Median incomes in the most affluent neighbourhoods are twice those of the least affluent.

The increases vary from £3.45-£6.69 per week for social rents and £6.63-£8.58 per week in LAR, however for 73% of tenants their full housing cost is met by either UC or housing benefit. Additionally, from December 2021 changes in the Universal Credit taper mean residents who qualify for the work allowance will keep more of their benefits

Changes to Universal Credit 2021

From December 2021 changes in the Universal Credit taper mean residents who qualify for the work allowance will keep more of their benefits.

Currently residents lose 63p for every £1 they earn of their Universal Credit benefits, from December they will reduce by 55p for every £1 earned.

Someone earning the National Living Wage, which is increasing to £9.50 an hour on 1 April 2022, would earn £190 for doing 20 hours of work. Under the old rules, they would see their Universal Credit reduced by £119.70; from December 2021 the benefit would be reduced by £104.50.

Private Renting Comparison

Residents living in the private rented sector (PRS) are not afforded the same protection as those living in social housing

- Private rental prices paid by tenants in the UK rose by 1.3% in the 12 months to August 2021, London private rental prices decreased by 0.4% in the 12 months to August 2021. (ONS – Index of Private Housing Rental Prices)
- When London is excluded from England, privately rented properties increased by 2.1% in the 12 months to August 2021. (Office for National Statistics – Index of Private Housing Rental Prices.)
- Current costs of private renting in Enfield vary from £215 pw for a bedsit to £327 pw for a two-bedroom property.
Housing Benefit rates (and the housing costs component of Universal Credit) have been frozen since April this year, this means the rents are no longer linked to market rents.

- The rent increase will negatively impact residents who are socioeconomically deprived. This is due to the pre-existing disadvantage that these residents face in employment, housing, education, etc which may lead them to struggle to pay their rent.

Mitigating actions to be taken.

Work is ongoing to support residents with the increasing cost of living. The council has developed resources and training for housing officers to help signpost residents to employment and skills support initiatives. A Route Map resource has been developed - a page on the Enfield Council Website which provided some information around employment support. This currently sits within Tenant Information section of the Council Website. www.enfield.gov.uk/jobsandtraining .

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SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Metrics concerning social housing delivered by Enfield Council are monitored on a quarterly basis using internal databases. Monitoring information contains demographic data to ensure that the services are not precluding any protected characteristic. This information will be used to monitor and respond to any emerging trends so that our provision is fit for purpose.