

Agenda Item No: 6

Report To: Cabinet

Date of Meeting: 15 December 2022

Report Title: Housing Revenue Account Business Plan 2022-2053

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ASHFORD
BOROUGH COUNCIL

Summary:

This is the latest annual report provided to members by officers in both Housing and Finance, who have once again worked collaboratively to produce the Council's Business Plan to 2053.

The Business Plan has never been compiled at a time of such great uncertainty. In the context of an ever-evolving political landscape, challenging financial times including the cost of living crisis, the increasing emphasis being placed on environmental matters and ever-improving digital solutions, the priorities set out in this report have been carefully reassessed by officers.

There are a number of assumptions considered in the building of the Business Plan relating to maintenance and repairs (including disabled adaptations and damp and mould), better engagement with tenants (a focus on customer service), as well as the importance of maintaining income levels for maintenance and new build programmes.

The plan remains affordable and viable throughout the life of the 30-year plan, and the Council is able to deliver on the priorities of the HRA, including those linked to the Corporate Plan. There continues to be some headroom for additional borrowing to accelerate housing delivery once planning matters are resolved.

Though the plan is not without risk, these factors are reviewed frequently by officers who will continue to budget carefully and responsibly with long-term security in mind.

Key Decision: NO

Significantly Affected Wards: None

Recommendations: The Cabinet is recommended to:-

- I. **Agree the priorities of the HRA as set out in the Business Plan report, the updated HRA Business**

Plan, and financial projections, and note the HRA Business Plan will be referred to Overview and Scrutiny (O&S) Budget Task Group, as part of the budget scrutiny process.

- II. Agree that dwelling rents are increased to the formula rent value on re-let**
- III. Agree that decisions for acquisitions are taken on a case-by-case basis within the existing delegations by the Assistant Director for Housing giving due regard to the HRA Business Plan and its priorities**
- IV. Authorise the Solicitor to the Council and Monitoring Officer to negotiate, finalise and complete necessary legal agreements and other documents to effect the above**

Policy Overview:

Building on solid foundations: delivering affordable homes in Ashford – delivery plan for 2019-2023

Housing Strategy Framework Priority 1 – Improve the supply of affordable housing to meet local housing needs in urban and rural areas, and Housing Statement 2018-2023

Reform of Housing Revenue Account (HRA) – Cabinet endorsed five key priorities for further spend, as a result of greater freedom within the HRA.

National Housing Strategy 2011 – delivering new homes under the affordable rent model.

A Charter For Social Housing Residents – Social Housing White Paper 2020.

A Guide to Developing Affordable Homes in Rural Communities (Kent Housing Group [KHG]) – February 2021

Housing Ombudsman Service – Spotlight on: Damp & Mould

Financial Implications:

This paper provides an update to the financial position of the HRA over the next 30 years and forecasts the HRA Business Plan continues to be a balanced, viable business and is able to deliver its key priorities.

The complex financial model is a tool for testing existing priorities, the impact of changes in Government policies and changes in key business sensitivities to ensure plans remain affordable. It is used for a variety of “what if” scenarios, as part of the feasibility stage of all plans and projects.

Delivery of new-build Council housing is achieved using grant funding, HRA cash resources and Right-to-Buy receipts (known as 1-4-1 monies). This ensures the HRA remains able to meet its debt repayment commitments.

The rent cap of 7%, announced, as part of the Autumn Statement has been included in the modelling.

Legal Implications:
*Text agreed by
Principal Solicitor –
Strategic
Development on 07
December 2022*

Section 167 of the Localism Act 2011 gave effect to Schedule 15 of that Act and, since the coming into force of Schedule 15, English local authorities have been required to be self-financing in relation to their housing stock, financing their housing stock from their own rents.

It is not a legal requirement to produce an HRA Business Plan; however, it is good practice and helps to ensure that HRA-related statutory duties and financial requirements are met, and to provide a good framework for long-term strategic planning and to see the impact of decision-making and wider contextual concerns

Equalities Impact Assessment:

See attached at **Appendix E**. The assessment does not identify any adverse impacts on any protected group

Data Protection Impact Assessment:

The impact on Data Protection will be undertaken for each individual project at the appropriate time.

Risk Assessment (Risk Appetite Statement):

Risk is identified as a separate section within the report and is considered a number of times when compiling the Business Plan. For example, risk assessments have been undertaken on each of the projects; in addition, risk in a wider context is closely monitored by the officers involved in each project, who meet regularly for discussion. The meetings identify any implications for the pipeline of sites being progressed or internal capacity issues.

Sustainability Implications:

After assumptions were presented to members in previous reports, a survey of HRA assets has provided the level of detail necessary to understand the impact of carbon reduction measures on the HRA Business Plan. A plan to get HRA stock to an EPC 'C' rating is in place. Central to that ambition is the bid to the Social Housing Decarbonisation Fund (SHDF). In addition to this retrofitting work, new-build projects are assessed individually to include the potential costs and benefits of strong carbon-friendly design. All new developments are expected to achieve an EPC A, as the aim is to have properties that are zero-carbon in operation.

Other Material Implications:

Design and construction standards will comply with Ashford spatial standards (complying with Residential Space and Layout SPD), Lifetime Homes (a standard the Council has set out for Registered Social Landlords) and Code for Sustainable Homes level 3 (which has been committed to for Page 17 Homes England purposes), and level 4 on energy.

Emphasis on the building envelope will deliver the greatest benefits for landlord and tenant

**Exempt from
Publication:**

YES IN PART – Appendix A only

This is not for publication by virtue of Paragraphs 2 and 3 of Part 1 of Schedule 12A of the Local Government Act 1972 and the public interest in maintaining the exemption outweighs the public interest in disclosing the information

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Report Title: Housing Revenue Account (HRA) Business Plan 2022-2053

Introduction and Background

1. The HRA is a ring-fenced account, this means that the HRA, and its tenants do not contribute to the General Fund, which is funded by taxpayers. Conversely, being a self-financing model, it means the HRA is fully reliant on its own income streams for all of its expenditure, and has no reliance on the General Fund.
2. Rental income and service charges are the main income sources for the HRA, while expenditure items include repairs, maintenance and management costs. Additionally, expenditure includes interest charged on the borrowing that funds the Council's new-build affordable homes programme.
3. This report looks forward and assesses how the Council will tackle the challenges it faces in its HRA in the context of economic, environmental, political and social factors. For context, it also briefly touches upon the progress made since members received the last annual HRA update. It is clear that to move forward in the next 12 months some innovation and care is necessary, while still understanding the wider risks. These risks are clearly set out later in the paper.
4. The Business Plan continues to be an important strategic tool. One of the underlying rules that govern the ring-fence is that councils cannot budget for a shortfall. Therefore, while a Business Plan is not a legal requirement, it remains good practice to maintain one.
5. The Social Housing Regulator monitors social housing providers, ensuring they are financially viable and properly managed in order that they can perform their functions efficiently, effectively, and economically, so undertaking this regular business planning exercise is an important tool. The regulator has expressed the need for providers of social housing to adopt a flexible approach in such challenging times. That flexibility is critical when considering the need to provide better customer service, act quicker and deliver more homes, all with less financial resources. The plan has therefore been stress-tested to look at a number of "what if" scenarios.
6. Members will recall that the Council took on £113.7m of debt in April 2012 when self-financing was introduced. This enables the Council to retain its rental income, allowing investment in the building and buying of new properties, as well as ensuring that existing stock is properly maintained
7. The purpose of the Business Plan is to ensure that the plans and aspirations of the HRA remain affordable. Officers will adhere to the processes put in place to assess the viability of projects and acquisitions that provide fresh delivery. Additional constraints of the Prudential Code also ensure the HRA is never over-stretched. The HRA Business Plan report considers the priorities and ambitions of the HRA over the life of the 30-year model. It is, by its very nature, based on a series of assumptions, never more so than this year, despite rigorous horizon scanning to predict forthcoming changes.
8. Year one of the business plan is the 2022/23 budget. Officers then look at the HRA priorities and development plans to ensure that future years include as

much detail as possible, including money for new homes, maintenance and engagement. Additionally, also for other necessities, such as an increased spend for disabled adaptations and ensuring there is sufficient budget to maintain, and where necessary, improve, housing standards, for example around the issues of damp and mould.

9. The Business Plan model is produced in consultation with finance officers, and with the assistance of a consultant from Housing Finance Associates, who has extensive experience of working closely with many councils with HRAs, as well as Housing Associations (known as Registered Providers, or RPs). The consultant also provides the role of “critical friend”, giving the model independent scrutiny. This provides reassurance that what is being proposed is rational, robust and works over the 30-year period.
- 10. Members are asked to review and agree the updated HRA Business Plan, and financial projections, and note the HRA Business Plan will be referred to Overview and Scrutiny (O&S) Budget Task Group, as part of the budget scrutiny process.**

Assumptions within the HRA Business Plan

11. The HRA Business Plan is built on several assumptions, which are set out in the following pages. The first of these assumptions are the priorities the housing service is continuing to work towards within the HRA itself.
- 12. Members are asked to note the HRA priorities, redefined below in paragraph 13.**
13. The HRA priorities are listed as follows:
 - a) Continuing to have a good maintenance programme – providing a choice of well-managed, safe, quality homes, which meet Decent Homes standards, this will include the rectification and prevention of health hazards, such as damp and mould
 - b) Decarbonisation – ensuring all Ashford’s HRA properties achieve a minimum EPC ‘C’ rating
 - c) Compliance with the Social Housing Regulator – ensuring that the Council is accountable to its tenants, putting customers at the heart of everything it does, delivering better customer service and contributing to the environmental, social and economic wellbeing of an area
 - d) Removing the stigma of social housing – changing the way the council communicates with residents and ensuring tenants have the opportunity to be involved in decisions that affect them and that the Council has a greater knowledge of them
 - e) Maximising new provision – accelerating the delivery of new build homes and acquisitions
 - f) Supporting the Corporate Agenda – through decarbonisation, reducing homelessness, enhanced digital solutions that provide better knowledge of the Council’s HRA customers, commercialisation and encouraging home ownership
 - g) Ensuring optimum use of resource – review income and expenditure within the HRA to deliver savings through more efficient working practices and maximising income generation

a. Continuing to have a good maintenance programme

14. Having good quality homes for tenants to live in has always been paramount, and successive Corporate Plans have placed an emphasis on this. Parts one and six of the Social Housing White Paper related to being safe in your home and having a good quality home and neighbourhood to live in. The Council must, therefore, deliver against these newly imposed obligations. This will be achieved by ensuring the following key areas continue to be a focus within the HRA Business Plan.

Decent Homes

15. This legislation has been a key part of HRA maintenance programmes, since 2006. However, it has come under scrutiny recently. The Housing Ombudsman has suggested that Decent Homes no longer reflects present day concerns, as the measures are subjective and not necessarily measurable, therefore standards will be expected to improve, across the sector. It is unknown at this time how these changes will affect Ashford, however officers will continue to review any policy changes.
16. *Damp and mould* – This issue, linked to Decent Homes, is worth singling out due to the current national interest in this issue following the media rightly reporting a coroner's verdict tragic death of a child in Rochdale. The Council's Housing service has produced a management action plan that details its approach to responding to reports of damp and mould. It is also briefing all internal stakeholders as to the Housing Ombudsman guidance on this matter and moving far away from 'lifestyle' as the assumption of causation. This will shift the responsibility from one of placing onus on the tenant to one of the Council adopting a zero-tolerance approach to damp and mould. All tenants will be written to, and those concerned will be asked to contact the Council, who will act quickly to rectify any issues.

Disabled adaptations

17. Disabled adaptations are a critical part of the Council's endeavours in enabling people to live in their own homes, particularly as the population ages. The quarter two budget monitoring report (Cabinet, November 2022) highlighted the increase in the projected outturn, from £500,000, to £1,000,000. This was to ensure that some larger projects that have been required in this financial year are able to be completed, improving living conditions for those whom the adaptations are helping.
18. Officers have also noticed a change in emphasis in the way that reports requesting adaptations are coming through to the Council. This has seen occupational therapists not only request a specific adaptation that has prompted a visit but a suite of additional measures being requested as a full package. It has therefore been assumed that in future years the spend in this area will be around £700,000 per annum, historically £500,000 was included here. The increase in budget will not only help with installation but better maintenance of those adaptations.
19. A full report on Disabled Adaptations and Disabled Facilities Grants (DFGs) in the private sector, is also submitted to December's Cabinet meeting.

New legislation

20. The Building Safety Act and the Fire Safety (England) Regulations 2021 make it a criminal offence not to comply with the Act. As part of the Corporate Plan ethos of 'Caring Ashford' it is essential that competence in this area is

demonstrated. This involves undertaking inspections, managing, documenting, evidencing, and recording compliance. Failure to adhere to the Building Safety Act and the Fire Safety (England) Regulations 2021 may result in criminal proceedings against the Council for non-compliance, a significant loss of reputation for the Council, limitless fines and residents living in potentially unsafe and poor quality accommodation at a time of heightened scrutiny on the sector.

Stock condition survey

21. In the previous Business Plan report presented to members, a five-year rolling stock condition survey was being investigated. However, in view of the high cost of a stock condition survey we are looking at proposals for an internal resource to carry out our stock survey work on a rolling annual programme as a potential alternative in order to ensure value for money, as well as resilience. However, the £87,000 annual budget for the condition surveys remains included within the Business Plan.

Price Per Property (PPP) and Price Per Void (PPV)

22. Officers have been in discussion with Equans, the repairs contractor, about PPV and PPP, which would be a move from the existing schedule of works arrangement, to a flat rate for every dwelling. A decision has yet to be taken on whether to move to PPP/PPV as officers are weighing up the substantial increase in costs with that of a potentially improved service at a time of increased emphasis on tenant satisfaction.

Wider Planned Maintenance Assumptions

23. Inflation has been an important consideration in the budget build, as it continues to rise. This is having an impact on contracts and the cost of materials. Additionally there is a move towards affordable warmth, which is why the planned maintenance team has been heavily involved in the decarbonisation bid detailed in the next section. Furthermore, the life span of assets remains unchanged, however properties are assessed for need before works are carried out.
24. There has been significant underspend in this area over a number of years, more recently this can be attributed to Covid. In 2022/23 the underspend will be as a result of a number of vacancies within the planned maintenance team. The slippage in these works has been scheduled to be completed over the next three to five years, however this will be monitored by officers in both housing and finance.
25. Additional posts will be requested through the usual internal processes to seek additional surveying staff to aid compliance and contracts work. These costs have been built into the Business Plan.

b. Decarbonisation

26. Decarbonisation is a priority within the HRA Business Plan, tying in with the Corporate Plan of Ashford and the Council being a 'Green Pioneer'. This will be achieved in two ways; firstly, the retrofit of the Council's existing stock and, secondly, the new build programme, which includes a number of different strategies to ensure the projects will be zero carbon in operation, thus ensuring quality homes for all council tenants and, potentially, savings on energy bills for those in retrofitted homes.

27. For example, the homes recently provided at East Stour Court, Berry Place and Halstow Way saw Standard Assessment Procedure (SAP) ratings, indicating the thermal efficiency of a building, of between 80 and 86. As a guide, anything over 100 would mean the buildings were actually a net producer of energy. The buildings were therefore rated EPC 'B'. The intention is that future developments would not only have a similar rating but also be 'zero-carbon in operation', where possible. In order to achieve this officers prioritise a 'fabric first' approach, concentrating on the structure and quality of the building's shell, in addition to more common 'high-ticket' measures, such as electric vehicle charging points and solar panels.
28. As discussed in previous updates to cabinet, it is the Council's intention that all of its social housing reaches at least an EPC C, by 2050. In order to understand the level of work necessary to achieve this the Council undertook a survey of its housing assets to establish the current energy ratings of the homes within its stock and the likely cost of retrofitting those homes that fall below the requirements.
29. It is now understood there are around 1,200 homes, within the HRA managed stock (circa 4,900 homes – not including those in the Private Finance Initiative [PFI]), that fall below an EPC band C. This is anticipated to cost around £20m, however it is expected this will be partially offset by grant funding from the Social Housing Decarbonisation Fund (SHDF). The first bid seeks just over £5m grant funding for the £11.5m project cost.
30. The first part of the decarbonisation project is intended to be the retrofitting of 727 of the lowest EPC-rated homes. A cross-service officer working group, including the Climate Change Manager and officers from housing, has submitted the first round bid for funding from the Department for Business, Energy and Industrial Strategy (BEIS). This has been reported into the Council's Climate Change Advisory Committee.
31. The internal working group has also been working closely with Turner and Townsend, the 'accelerator', appointed by BEIS and E-ON, with whom it intends to collaborate, to deliver the programme following a successful bid. This work would need to be carried out in 2023/24 and 2024/25 to satisfy the conditions of any successful bid. The remaining homes could be delivered through a separate bid. It has been suggested that future bidding rounds will not be as generous as this round of funding. Therefore, an application to bid for a large number of homes was submitted in order to maximise funding.
32. It is anticipated that the remaining homes will cost a predicted, albeit less certain, £8m. Working at the planned pace, the Council would achieve an EPC C rating for all of its HRA stock by 2030, surpassing the Corporate Plan target of 2050. For the remaining work, it is hoped that future subsidy will lower this total and therefore reduce the burden on the Business Plan.
33. Showing leadership in this area is the Council's responsibility, as the lead organisation in the borough, enabling it to influence behaviour change in communities, to drive business transactions and markets and help stimulate the green economy. That is why the Council has taken the opportunity to bid for grant so seriously.
34. Also, a new post has been incorporated into the plan for a Tenant Engagement Officer, whose role would be to ensure the smooth implementation of all the necessary work. This is something recommended by the BEIS accelerator, who have found it necessary to have a specific

resource to engage with residents to ensure they are aware of the work to be carried out, the merit of that work, and to ensure access is willingly provided when contractors are ready to undertake the work.

35. The model is currently assuming the PFI properties at Stanhope will be converted, for carbon reducing measures, by the Council after 2037, when the assets revert back to the council's ownership. The contract requires the Consortium to meet new standards and keep the SAP rating in these homes at 70 (a good level of energy efficiency). Officers are seeking advice as to how to progress this further and the matter is being raised at PFI board meetings, however at this time the PFI properties are an unknown quantity and have not been included in the estimates.
36. One point that is important to stress here is the ongoing work that will be undertaken with tenants whose properties have this work completed. Ensuring good ventilation in the homes that are retrofitted is vital and using digital solutions that measure humidity is essential to ensure that the Council is able to monitor the behaviour of residents. The Council's bid to the decarbonisation fund will address this through the digital solution to be employed and the tenant engagement process.

c. Compliance with the Social Housing Regulator

37. The outcomes of new Social Housing Regulation Bill are intended to secure continued transparency, improvement, and accountability from those making decisions that affect social housing tenants, and to simplify the process of regulation. It also ensures compliance on major safety concerns through performance monitoring and the possibility of Ofsted-style inspections.
38. This necessitates a cultural shift, which would lead to a number of customer service improvements for the tenants. The Bill will shape the way in which the Council delivers its services to its tenants, who are also residents and customers. That terminology is important.
39. Performance across the whole Housing service must be improved and there must be more accountability as a result. Meaningful tenant engagement is the way forward. These residents must be able to influence the decision-making processes for the services that affect them.
40. In order to achieve this a Strategic Tenant Engagement Officer has been included within the plan to drive this work and cultural shift.
41. Focused monthly Housing Management Team meetings have seen officers work through an implementation plan, discussing the seven themes from the Government's original Social Housing Charter. Example work to date has:
 - Included a review of the complaints handling process within Housing (reviewing historic complaints to identify trends and opportunities for change or improvement) – this has been through internal discussion among housing officers
 - Seen a whole tenant and leaseholder survey conducted, which has led to the production of an action plan to address feedback where dissatisfaction has been expressed by tenants or leaseholders with an element of the service provided – the wider results of this survey and its desktop analysis will be reported to Management Team fully in due course and shared with members

42. The headlines from the survey however, indicate around 80% of residents are satisfied with the service they receive from the Housing team. The same number believe their home is safe and well-maintained. However, 56% of residents believe the Council listens to them and acts on their feedback, and a similar percentage were happy with complaints handling and dealing with antisocial behaviour. As a result of this feedback it is important to focus on these areas of customer service, therefore provision has been made in the model for an additional post in this area.
43. The service has also been reviewing and planning for the introduction of the Tenant Satisfaction Measures (TSMs), published on Gov.uk in September 2022. From 1st April 2023 all RPs of social housing must publish information about how they are performing on areas such as repairs, safety checks, and complaints. This information will be comparable, allowing benchmarking among the RPs for the benefit of service users who can scrutinise the performance of their landlord. With the emphasis on listening to, and acting on, feedback, landlords will gain valuable insight from those tenants.
44. There are 22 TSMs (**listed at Appendix C**) covering five themes, 10 will be measured by the Council, as the landlord, and 12 will be measured by tenant perception surveys. As a landlord with stock totalling over 1,000 units the Council will be expected to publish performance on TSMs annually. In order to achieve this officers have been looking at the way in which it currently records compliance through its IT systems.
45. At the time of writing, a number of engagement sessions have been held with the Tenant Participation Advisory Service (TPAS) in order to understand how tenant services can be best designed to achieve the aims set out by the Social Housing Regulator and improve the engagement between the Council and its tenants. TPAS is in the process of producing a report with recommendations on how to progress this further.
46. In due course, a formal tenant engagement strategy will be produced, though an interim strategy, which sets out the vision and achievements to date will be worked on now and all officers involved in the tenant experience will be expected to embark on this new journey.
47. This work, and the two strategically focused tenant participation officer posts are included in the model, one of which is to specifically drive forward this agenda and the other is to focus predominantly on the Social Housing Decarbonisation Fund work as outlined above.

d. Removing social housing's stigma

48. Linked to the above work, it is vital the Council continues, as part of its commitment to the Corporate Plan to reinforce the "Caring Ashford" ethos. Housing shares the wider ambition that it is a long-term aim that the borough's towns, villages and rural communities are welcoming, safe places for all who live and work in them, offering a high quality of life where everyone is valued and respected.
49. This is the very essence of the Social Housing Regulation Bill, working to a level playing field, where tenure should not impact the quality or approach of service delivery. This echoes the strategy, detailed above, to empower and listen to tenants, ensuring their voices are heard.
50. Levelling up is a political aim expressed in the 2019 Conservative manifesto aimed at reducing the imbalances between, among other things, social

groups. The work the Council has always undertaken to deliver new homes and quality housing for all is very much aligned with this goal and the Council continues to welcome these intentions.

51. Daily operations across the Housing service and the work undertaken following the publication of the Social Housing Regulation Bill, are leading towards a healthy position where the Council is meeting regulation standards and, as a result, visibly illustrating that the Council is attentive to all residents, regardless of the tenure of their home.

e. Maximising new provision

52. The Council has strong aspirations to not only increase the number of homes within its housing stock, but to accelerate those numbers. If it fails to do so then there is a risk that some of the 1,500 households on the waiting list may present to the Council through the more financially and socially costly homelessness route. Additionally, without the ability to increase stock levels, those in temporary accommodation will not have a sustainable tenancy to move onto. However, with limitations imposed by the implications of the current economic climate, as well as the issue of nutrient neutrality at Stodmarsh, a number of projects are being slipped into future years.
53. Having completed three high-quality schemes in the past financial year at East Stour Court (29 homes for independent living), Berry Place (31 homes for independent living) and Halstow Way (17 homes for general needs), this leaves the Council with no projects able to progress on site within the Stour Catchment, though two schemes have planning approval 'subject to mitigation' – these being:
 - 55 Mabledon Avenue (20 homes), formerly owned by Piper Joinery - All decontamination work has been undertaken, which means the Council is ready to procure a contractor, once Stodmarsh has been resolved
 - Kilndown, Stanhope – where a 5-bedroom house will be provided to add to stock numbers. This is important given the lack of larger homes becoming available for families on the waiting list, given they are so infrequently provided through section 106 agreements.
54. The Council has been progressing pipeline sites through the planning system where it can, however there have been delays due to the current resource issues in Planning. However, outside the Stour Catchment, progress can be and is being made subject to planning permission in the usual way, and at Chapman's Close, Challock, a bespoke two-storey home is permitted and being built for a family with a disabled son whose needs are complex.
55. September saw plans for a 'zero-carbon in operation' independent living scheme at Oakleigh House for older persons and those with learning disabilities refused planning permission by the Planning Committee. These plans have been re-worked and re-submitted as there remains an obvious and identifiable need for such homes, subject to planning permission. A full inventory of pipeline sites, as well as their development status, is listed in **Exempt Appendix A**. As in previous years, members may also be interested **Appendix D**, which details delivery throughout the years.
56. Although Stodmarsh has affected the Council's ability to build new homes within the Catchment, there is still a significant need in the borough. As a result the Council's route to delivering new affordable housing has been through its acquisitions, such as the street purchase programme, the

acquisition of s106 homes (where RPs are unable or unwilling to step in, such as the acquisitions at Chilmington) and homes bought off-plan (notably at the New Quarter).

Street Purchases

57. 'Street purchases' have previously been a quick and simple way to increase stock numbers. Homes bought off the open market, using right-to-buy receipts, have added over 110 homes to the HRA since the beginning of the 2019-20 financial year. These are existing properties, in many cases former Council homes, in areas where the Council has existing stock.
58. Previously the Council has concentrated on buying one and two-bedroom homes to act as 'move-on' accommodation for those in temporary accommodation (TA), thus reducing the need for expensive bed and breakfast (B&B) solutions within the General Fund. However, there is also a clear need for larger properties in the HRA, as four and five-bedroom homes are hard to come by through other means.
59. Unfortunately, the financial viability of this type of purchase does not result in an acceptable return for the Council, this is due to the current high cost of borrowing and the low rent, with larger homes and rural homes being particularly unaffordable.
60. However, it was agreed in last year's report that the Plan would cross-subsidise a small number of these homes in order to make them affordable and ensure that those on the waiting list with such a need would not be waiting endlessly. This continues to be the objective, but each purchase will be made on its own merits and therefore no provision for street purchases has been made in the Business Plan.

Right sizing

61. Given that it is not possible to currently deliver new homes within the Stodmarsh Catchment, making the Council's existing stock work harder is paramount. Therefore right-sizing, ensuring residents are in homes appropriate to their needs, is critical. With the demand for family-sized accommodation continuing to increase, a scheme has been created to reward tenants who downsize their council home by offering help to find the right property as well as financial help to move. This is in addition to the over 50s assisted move scheme.
62. Mutual exchanges are being proactively encouraged as a way of finding solutions for those households on the waiting list. The promotion of the HomeSwapper website and dedicated resource to see the exchanges through is leading to an increased number of exchanges happening. There were 19 exchanges in the 2021-22 financial year.
63. It is vitally important that the Council is able to continue this important work given the difficulties in building, and the risks associated with borrowing if it chooses to acquire new homes.

f. Supporting the corporate agenda

Homelessness

64. Reducing homelessness is a General Fund function, but is intrinsically linked to the HRA, as officers across the wider development team provide TA and increase HRA provision simultaneously. As stated previously, it is not enough to provide more TA alone, as those people need accommodation to move-on

to. Without additional homes in the HRA, the pressure on temporary accommodation will only increase.

Commercialisation

65. This is not just about deriving an income from the work the Council undertakes but working smarter, in a leaner way. Officers have been liaising with Development Officers across East Kent councils, to see what knowledge, capability and practices could reasonably be shared to enhance service delivery and accelerate new-build opportunities across the authorities' areas.
66. In addition, a number of savings have been included in the Business Plan, such as a reduction in Planned Maintenance costs of £2.5m in 2023/24 and £2m in 2024/25. As well as a savings target of £200,000 in each year.

Digitalisation

67. Ensuring the Housing Service continues to adapt to technological advances is vitally important. The digital transition of lifelines is one such piece of work. Officers have established a cross-departmental working group to manage and simplify the transition to trial 4G standalone lifelines.
68. Enhancing customer service with technology, where possible, is an essential part of the better conversations needed with tenants. A new Customer Relationship Management (CRM) system is to be procured to facilitate this. Additionally, the data held on existing software must be improved to build up the knowledge base of both customers and stock.

Benchmarking

69. Officers are continuing to investigate ways that Ashford can compare costs and ways of working with other, similar organisations, including other local authorities and housing associations. Unfortunately, due to staff turnover, this project has been temporarily delayed.

g. Ensuring optimum use of resource

70. Adding strands of work to the HRA Business Plan to cover the ever-growing list of priorities that address the shifting landscape in which the housing service operates is necessary. There is a balance between adding costs to the Business Plan and ensuring the housing service is able to adapt to the challenges it faces. This is vital so that it does not fall behind in terms of provision and does not lead to perceptions of poor performance. However, it is necessary to review income and expenditure within the HRA to deliver savings through more efficient working practices and maximising revenue.
71. The Council has therefore committed to make savings within the Business Plan. This will be through a combination of natural wastage and savings in expenditure. It will not be a simple task to deliver, as reining in work streams and scaling back programmes of maintenance, new-build and acquisition have consequences.

Other assumptions

72. In addition to the seven priorities above, there are a number of other assumptions built into the model. These assumptions are the backbone of the model and if incorrect may mean mitigations are needed urgently. Officers are aware of this and are keeping up-to-date with the latest information so any changes can be fed into the model and action taken as quickly as possible.

Rent

73. In 2017 Government announced that for five years, from 2020, rents setting would be limited to CPI+1%. For 2023/24 this would mean a rent increase of 11.1%. However, as part of the Autumn Statement the Chancellor announced that the increase on rents would be capped at 7%. This has led to a reduction in income of £1,065,000 in 2023/24, but £32,000,000 over the life of the plan.
74. This cap on rent revenue has led to a number of mitigations being introduced, for example, the development plan has been extended over 10 years, instead of five. In addition, a number of savings have been incorporated into the plan, such as the £4.5m, over two years, on planned maintenance.
75. If the Council chooses not to accept this 7% increase, but instead opt for a lower increase, or perhaps a freeze on rents, it would lead to serious consequences for the model. The forecast rent loss is as follows:

One Year Cap	Loss in 2023/24 (compared to 7% cap)	Loss over life of model
Rent Freeze	£1.82m	£54.32m
5% cap	£0.52m	£15.52m
3% cap	£1.04m	£54.32m

76. This small percentage change in rent increase could affect development plans not only in the short-term but over the life of the plan. It is for this reason the Government's 7% cap has been incorporated into the model, as any further reduction would mean a significant loss of anticipated income.
77. The model assumes the cap on rent increases will only be in place for one year, at which point rent will increase by CPI+1% for one year. Following that, the five-year period of rent increase "certainty" comes to an end, so the assumption in the Business Plan is for a CPI only increase going forward.
78. While the rent increase is capped at 7% the formula rent is not, this continues to follow the previous guidance of a CPI + 1% increase. In addition to this the Government guidance on rent increases (Guidance on Rent for Social Housing 2014) states that "...we expect authorities to adhere to the limit on rent changes but to move the rent up to formula rent where the property is re-let following vacancy". In order to both maximise rent revenue and to adhere to the guidance it is proposed that **Cabinet recommend that following a vacancy the rent charged for each property be increased in line with the formula rent value.**

Bad Debts

79. Arrears levels are currently around 0.72% in 2022/23 and the assumptions in the business plan follow this trend. However, the current cost of living crisis may lead to an increase in this area. A 1% increase in arrears could lead to a £300,000 increase in the bad debt provision. It is therefore key that officers continue to monitor arrears and provide as much support to tenants as possible to enable them to keep up with their rent.

80. As part of the Autumn Statement the Chancellor announced that benefits would increase in-line with inflation, which, it is hoped will assist tenants to keep pace with increasing costs and therefore continue to manage their rents.

Voids

81. The time taken to let homes remains higher than the Council's target of 17 days. At the time of writing, the average number of void days is around 30. This has remained high since the height of the pandemic, although the time taken has halved from where it was in the spring of 2022.
82. There are mitigating circumstances for this, which show the care with which properties are allocated by the relevant team. A number of the homes that have taken longer to allocate have required a very sensitive approach to letting, for example for geographical (rural) reasons or personal circumstances (an assisted move, liaising with an occupational therapist). The end result must be the right person in the right home in the right area.
83. In order to bring down void waiting times officers are reviewing the processes involved, such as those around returning keys, and implementing a pre-void process to ensure properties are returned in the expected state. Work will be done to ensure that any issues are raised with the void contractor quickly to reduce delays.

Inflation

84. The impact of the cost of living crisis is being felt across all service areas, the HRA is no different. Contract costs are increasing due to the increasing cost of materials, employers may also be looking to increase wages, the cost of which will be pushed onto its customers. In this context, the customer is actually the Council.
85. Inflation in the coming year is currently difficult to predict, which makes forecasting over a 30-year period problematic. The model assumes that inflation over the next year will be 13%, reducing to 5.5% the following year and settling at 2% thereafter. As more information regarding future pressures comes forward, the plan will be re-modelled and any decisions regarding mitigating action will be brought to members as necessary.

Interest rates

86. These have increased significantly since the start of the year and are expected to continue to rise, at least for the next year. The model takes this into account, which has made borrowing substantially more expensive than in previous years. This has reduced the viability of some potential development projects and reduces the borrowing headroom.

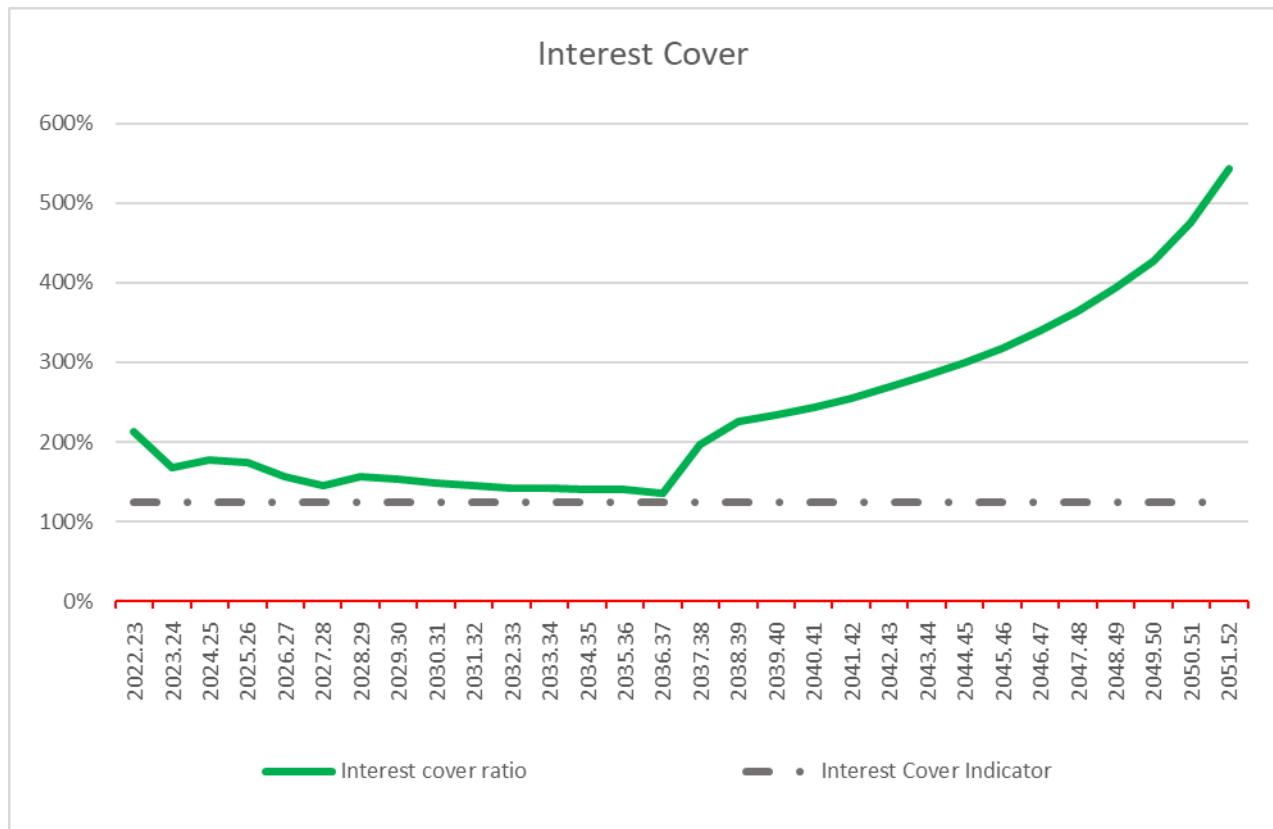
Debt cap

87. As part of the HRA buy-out the Government removed the need for a debt cap in the autumn of 2018.
88. Without a Government-imposed debt cap the Council still needs to illustrate its approach is responsible. The approach officers have taken is to use an "Interest Cover Ratio". This is the number of times the HRA is able to repay its loan interest (based on net income). RPs have a minimum interest cover requirement of 125%. This is a sensible and prudent approach that has been implemented by the Council (HRA Business Plan Report December 2021).
89. With inflation and borrowing costs at the levels they are, but income lower, due to the rent cap, the problem is not just the viability of individual schemes.

Even if a proposed scheme acquisition were to be viable, this would impact the amount of headroom for borrowing in the HRA.

Graph 1 – Interest cover

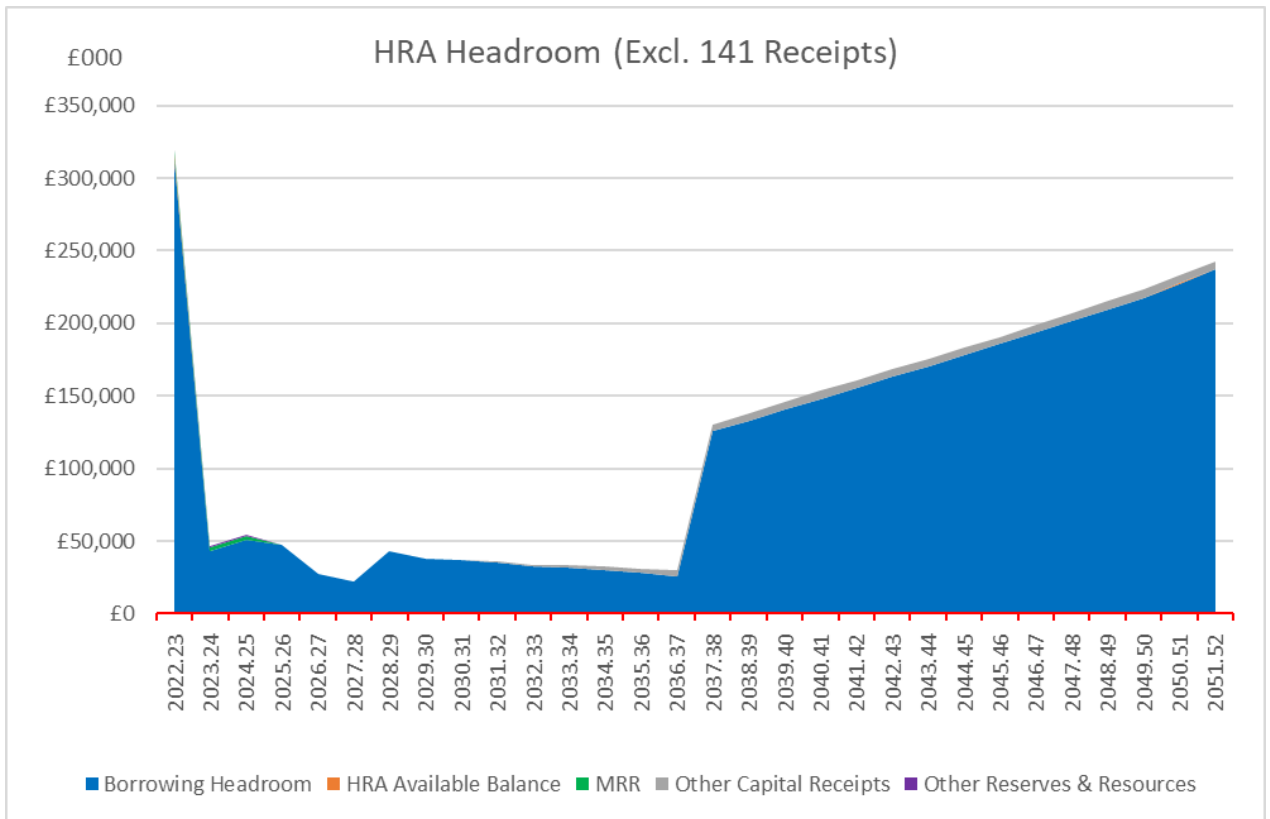
- 90. The dotted line, in the graph below, shows the 125% minimum cover required, with the green line showing how this varies throughout the life of the model. The increase shown in the interest cover, from 2036/37, is the impact of the PFI ending. While this will lead to an increase in management and repairs costs it will no longer see payments made to the contractor, benefitting the HRA as a result.
- 91. This table also demonstrates that while there is some borrowing headroom, in the current financial climate it may not take much to significantly affect the available headroom.



- 92. The borrowing headroom available can also be seen on graph 2, below.

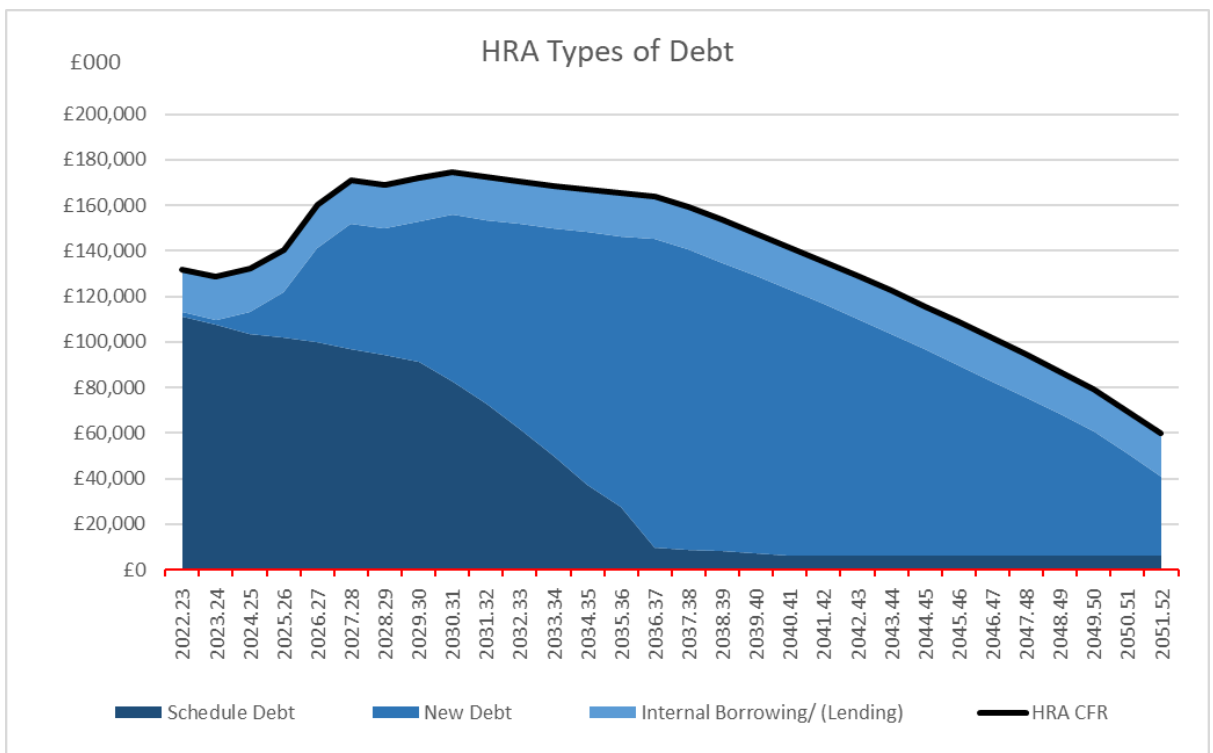
Graph 2 – HRA headroom

The graph below follows a similar shape to that in Graph 1, but instead shows how much borrowing is potentially available at various stages throughout the 30 year plan.



93. Debt repayment continues to be a priority and Graph 3, below, shows that while the debt is not fully paid off during the plan, the trajectory of repayment is reducing.

Graph 3 – HRA types of debt



Repairs and maintenance

94. Due to the uncertainty around inflation, projected costs in 2023/24 have been increased by 25% to reflect the current expectations. However, due to resource issues in the team it is unlikely that the anticipated schedule of works will be achieved. Therefore, the major works for the 2023/24 and 2024/25 financial years have been reduced by £2,500,000 and £2,000,000 respectively. A temporary post to assist with managing repairs functions and an additional compliance officer post have been factored into the plan to ensure the service is able to continue to respond to demand.

Management Costs

95. As outlined above, in the HRA priorities section, there are a number of additional costs due to the implementation of the new Social Housing Regulation Bill, including an additional member of staff in the Area Management team to help better engage with residents. The need for this has been borne out by the results of the tenants' survey. Therefore including the post within the plan is the earliest possible illustration that the Council is listening to its customers.

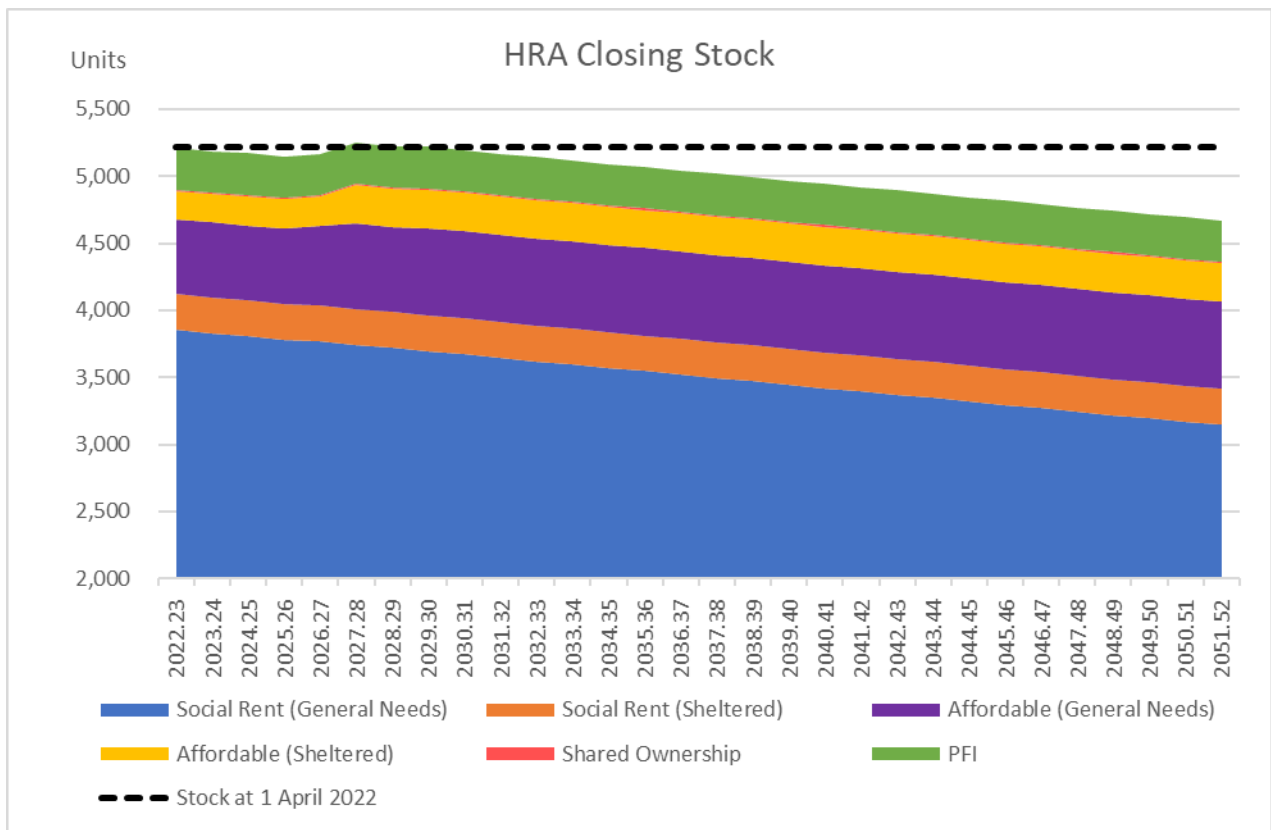
PFI

96. The PFI at Stanhope is due to be returned to Ashford Borough Council management in 2036/37, at which time it is assumed there will be additional costs, per unit, for management, repairs and maintenance, as well as savings, due to there being no further payments to contractors. There will be a £3,000,000 loss in the Government grant but the effects on headroom are apparent from the previous graphs.

Right to Buy

97. Based on historic information there are usually around 25 Right to Buy transactions completed per year. The model continues to base Right to Buy assumptions on this number, though in reality this is an unknown quantity due to the current uncertainty of the housing market, as well as the availability of mortgages to prospective buyers.
98. The impact of Right to Buy sales can be seen in **Graph 4**, below. The dotted line shows the current level of stock, which is around 5,200. The stock numbers increase to a maximum of 5,249 by 2027/28, however numbers then start to decline, with the final figure, at the end of the 30-year plan, of 4,667.

Graph 4 – Anticipated stock levels throughout the 30-year Business Plan



Risks to the HRA Business Plan

99. The past few years have seen an unprecedented level of uncertainty due to the concerns around leaving the EU, the effects of Covid, the war in Ukraine, the cost of living crisis, as well as changes in Prime Minister and Cabinet. These continue to have an effect on the finances of the HRA and therefore any assumptions that have been made are subject to change.

Inflation

100. Increased inflation is possibly the biggest risk to the Business Plan at the current time, that and rising interest rates. With inflation at 11.1% in October and not expected to fall back to the Government target of 2% for a number of years, there will be an increase in the cost of materials and other costs associated with having multiple contracts. This would normally be at least partially offset with an inflationary increase in rents, however, the 7% cap on rent increases adds to the inflationary pressure on the Business Plan.

101. Unfortunately inflation is outside of the Council's control, however its effects can be mitigated against, as they become known. As such, the budgets and projects will be reviewed on a regular basis to ensure they are still affordable, and if not, officers will liaise with members, where necessary, to ensure decisions can be made to ensure long-term affordability.

102. The effect of inflation and the mitigations that have been put in place have already had an impact on the Business Plan. Last year members may recall that at the end of the 30-year projected period, the level of debt was around £190m (factoring in the estimated costs of decarbonisation). This year, at the end of the projected period of 30 years the debt level is actually only £78m but the affordability of the plan is that much tighter.

Interest rates

103. This is another big risk to the plan. As the cost of borrowing rises, it affects the viability of acquisitions and new development projects. Each project added to the plan is looked at individually, taking the most recent information into account. If it is viable it is added to the model, if not then it is looked at again to see if any changes can be made to the project to increase its viability. The other option is to delay the project until borrowing costs are reduced.

Stodmarsh

104. Achieving nutrient neutrality is one of the Council's Super Six corporate priority projects. However, this issue has caused, and continues to cause delays in plans for development plans.
105. A detailed update on the progress of the Council's strategic wetland solution is set out in a previous Cabinet report ('Stodmarsh Update', October 2022). The report confirms the Council anticipates that it will be in a position to submit a planning application for the first of two phases for the wetland in early 2023. At which point housing officers will be able to re-assess its development timeline.

Covid-19

106. With restrictions relaxed and the Government's approach now one of 'living with Covid', this is far less influential on the Business Plan than it has been in the past two years. With an established approach to hybrid working, Ashford is well-equipped to avoid shortages in staff as it ensures a mix of home and office-based work for staff. Additionally, when development projects do get on site, social distancing will still be possible at groundworks stage, so if there is a need to re-introduce guidelines then projects should still be able to progress with relative ease. However, this continues to be a potential risk to projects in the Business Plan, and with China's continuing zero-Covid approach there could be some impact on the availability of materials. This continues to be monitored by officers.

War in Ukraine

107. The sustained atrocities in Ukraine continue to have an impact on the cost of fuel and energy. This in turn, is affecting residents; officers continue to make tenants and residents aware of the ways in which assistance can be found, should it be needed. As part of the Kent Housing Group, the Council links in with themed events. An event in the spring of 2023 will see housing professionals from across the sector share learning. In addition to this, there are a number of other costs to the HRA, such as office costs, which have increased, as well as the cost of contractors, who will inevitably pass this pressure on to customers. The effect of this war on fuel and energy costs will likely be felt years after any potential resolution, and as such these unknowable and unpredictable costs are a risk to the plan.

Government policy

108. The turbulence of national politics means the current Minister for Housing is the fifth MP to have held the post in 2022. While the tenure of ministers who have held this role is invariably short, this year has been particularly unstable for the sector. Colleagues in the South East Local Enterprise Partnership (SELEP) and Homes England had built a strong rapport with the post holder who began the year and collaborative progress was being made on

discussions around first homes and Stodmarsh. Hopefully, this impetus will not be lost. It is too early to say how things may develop and change under the stewardship of the current minister.

109. In addition to this each new Prime Minister and their cabinet have varying priorities. At the time of writing the Autumn Statement has been announced, including the announcement of the 7% rent cap for 2023/24. Stability is crucial for the purposes of business planning and any changes in policy will be a risk to the model. However, officers will continue to monitor any policy changes and model their effects on the HRA.
110. The cap on rent increases is, currently for one year only, however this could change. This means that rent revenue is also a risk, as it is difficult to predict inflation over the next 30 years as well as the Government's response to it.

Arrears

111. Tenant arrears will be a risk to the model, more so than in previous years, as the cost of living crisis will undoubtedly have an impact on some more vulnerable residents.
112. The rent increase cap of 7% is a lot lower than the 11.1% (CPI+1%) increase tenants would have been expecting. In addition to this the national living wage will also increase by 9.7% to £10.42. However, with the energy price guarantee expected to increase further in April, as well as food costs continuing to rise, tenants may be facing some difficult decisions.
113. Therefore, officers are on the case. Neighbourhood Housing Officers are responsible for income collection, and tenants' accounts are monitored on a weekly basis, in line with the Council's policy. This involves identifying those accounts where rent payments have fallen more than six weeks behind, then following up with the appropriate course of action, such as sensitive conversations, a repayment plan, as well as general advice about managing income and expenditure, and signposting to more specialist partnership or voluntary organisations, where appropriate.

Voids

114. While the void process is being streamlined it does continue to be a risk to the model. Any staff shortages, or issues with contractors, will inevitably increase turn-around time. This is not only an issue in regards to lost rent income, but there is an associated impact to the General Fund, with fewer properties available for move-on accommodation for homelessness, leading to higher temporary accommodation costs in the General Fund.

Right to Buy sales

115. If Right to Buy (RTB) sales were to increase substantially it would mean that there is additional funding, in the way of 1-4-1 money. However, this loss of properties would mean a reduction in stock levels that would not be able to be replaced as quickly as the Council would hope, due in part to the high replacement costs, which are much higher than the 1-4-1 contribution received, and other current planning concerns or viability issues.
116. Conversely, due to the current economic circumstances and the difficulties in getting, and affording, a mortgage, RTBs could reduce in number. If they were to substantially reduce, while helping to maintain the stock position it could have a detrimental effect on funding new projects. Again, inflation and interest rates will play a significant part here.

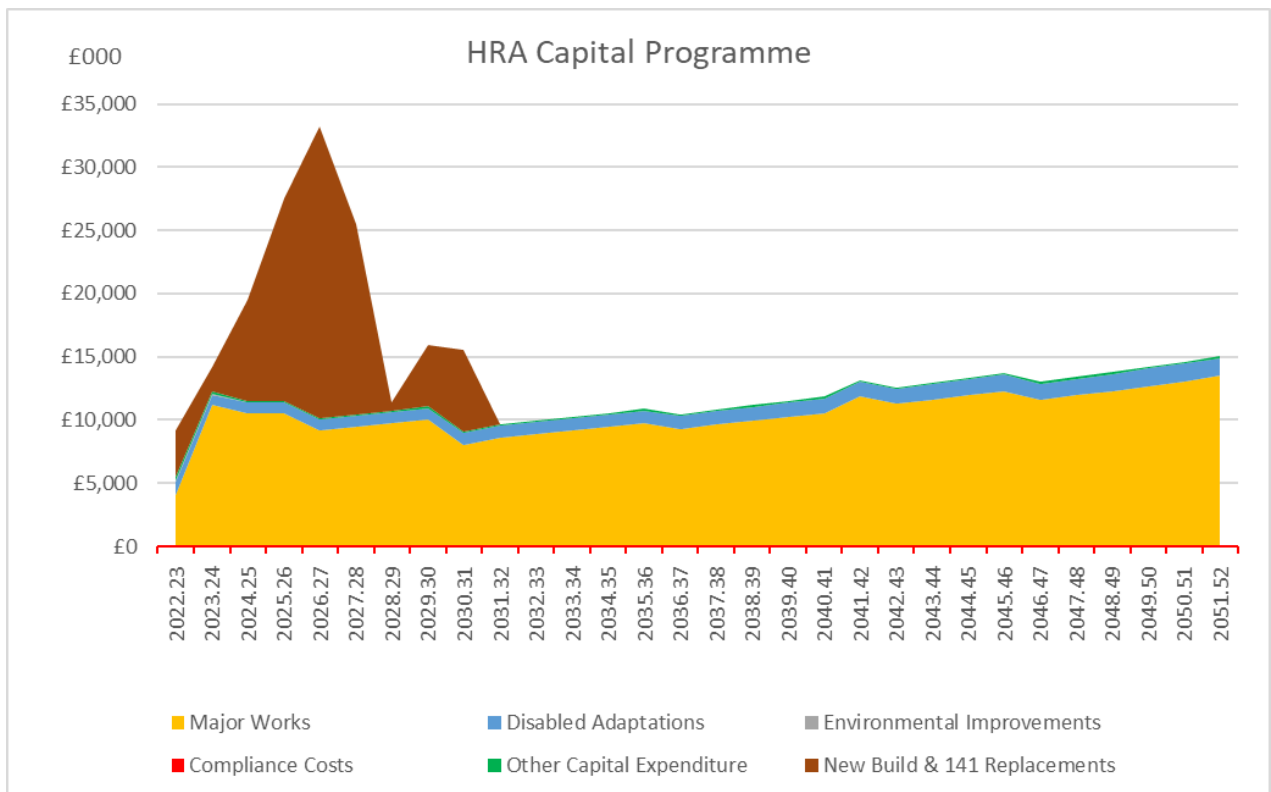
Availability of sites

117. As has been documented in previous reports, there is a lack of Council-owned sites on which to develop. It is for this reason that a number of land purchases have been made, under delegated authority, to secure s106 sites where appropriate and viable. This will eventually be the only route open to the Council to proceed. Officers from housing outlined the current approach used in a presentation to Overview and Scrutiny Committee in October 2022 and will continue to look at viable options to extend its pipeline opportunities for the future.
118. Therefore, in the context of the Business Plan, it is suggested that the Council continues to adopt a flexible position with regards acquisitions within its existing delegated processes, as outlined in recommendation iii.

Business Plan modelling outcomes

119. The business modelling shows a balanced and sustainable Business Plan. However, a number of mitigations have been required to achieve this. This is due to several factors, as explained, such as increased borrowing costs, high inflation, and lower rent income, as a result of the 7% cap.
120. There is a need to maintain income levels throughout the life of the model, in order to ensure that plans and projects remain deliverable. This will involve a number of elements, including increasing rent revenue in line with inflation, where possible, as well as increasing the rent to the formula rent level (as per Government guidance) when a property becomes void. Also, void times need to be lowered – this will not only mean an increase in revenue but will also mean shorter waiting list times. In addition to these measures, officers will monitor arrears levels and take action earlier to ensure that tenants do not fall into arrears with its associated welfare risks.
121. Historically the Council has been proactive in house building and buying, this usually results in loading the first five years of the model with those projects that are reasonably certain to go ahead. For this year's iteration of the model, the development projects have been spread over a longer period, the effect of this can be seen in the graph below:

Graph 5 – HRA Capital Programme



122. This graph shows that instead of a peak in the first five years of the model, projects have been spread over ten years, with a second, albeit small peak, in capital expenditure. This effectively smooths out the capital expenditure and the associated costs, including borrowing costs. **Graph 3** (included earlier) is illustrative of the effects of this smoothing. It shows the debt increasing steadily, rather than a one-off peak, at which point the debt starts reducing as it begins to get repaid over the life of the plan.
123. The projects included in the plan, including anticipated timescales, are included at **Exempt Appendix A**.
124. **Appendix B** shows the revenue income and expenditure for the first 10 years of the plan. The final line of this table shows that a minimum balance of £1m is maintained. This trend continues throughout the 30-year model.
125. The table also shows the interest being repaid by the HRA. This figure peaks in 2032/33, in line with the borrowing required for the capital expenditure. Then as the debt is repaid the interest payments also reduce.
126. While the debt is not expected to be paid off in the next 30 years the downward trajectory is clear. However, the current economic climate is a reminder to ensure that all projects are financially viable and are able to fit within the model without creating undue pressure. This is because the future is unknown, so any small changes in Government policy or economic landscape could have a huge effect on the affordability of the business.

Equalities impact assessment

127. Members are referred to the attached assessment in **Appendix E**. There are no adverse impacts on groups with protected characteristics.

Consultation planned or undertaken

128. Consultation will continue to be held with ward members where acquisitions or proposals for development fall within their ward boundaries. As mentioned previously this has led to good outcomes and the engagement of ward members is always appreciated to help shape development schemes in particular. All sites within any future delivery programme are subject to planning approval and the formal consultation process as part of that. Consultation will take place with local residents and ward members, before proposed plans are submitted, giving them an additional opportunity to respond to the proposals outside of the formal planning consultation process.
129. Consultation, or rather engagement and conversation, with tenants is clearly required as the Council develops its tenant engagement plans, in line with the requirements in the Social Housing Regulation Bill. This is a focal point of the Council's HRA priorities and both at a strategic and operational level, the involvement of residents living in Council-owned homes will improve.
130. The Council will also consult, with those whose homes are part of the Social Housing Decarbonisation Fund bid. It is paramount that this work is undertaken and, as identified, engagement here is one of the keys to the success of delivering the necessary outcomes.

Next steps in Process

131. The HRA Business Plan is used as a basis to build the 2023/24 budget, which was agreed by Cabinet on 24th November 2022, this will form part of the public consultation on the draft budget. The final budget report will be presented to Cabinet in February with final approval being sought through Council a week later.
132. The Council will progress its current priorities, including the delivery programme of sites included in the Business Plan and some sites not yet included in the HRA Business Plan model. This process will be reviewed as sites become more certain. There is some fluidity to the list, and it is important that it is regularly reviewed. Relevant stakeholders will be kept informed at all stages of the process.

Conclusion

133. At a time of extensive contextual change and shift, the HRA Business Plan remains viable. It addresses the most pressing priorities that the Housing Service faces and adopts an approach that will see it enhance its customer services to residents. It also aligns its priorities with the Corporate Plan.
134. Adopting such an approach ensures the Housing Service remains at the forefront of housing in the county. It recently enjoyed success in the Kent Housing Group Excellence awards, with its Electrical Services team winning team of the year and some of its projects and officers highly commended. Officers in the service continue to be part of the countywide conversation through their leading roles in the Kent Housing Group board and sub-groups. Ashford's Housing team, in continuing to work with other local councils, RPs

and developers, is ensuring it is at the forefront of debate in Kent and its ambitions are clear to see.

Portfolio Holders' Views

Cllr Andrew Buchanan, Portfolio holder for housing

135. The Housing Revenue Account is one of this authority's success stories. The conversations that have been held in the formulation of this year's plan and associated report have not been straightforward as this has not been an easy process. However, the result is a balanced plan that focuses on the major priorities affecting the sector and the services that our residents would want us to address – being a green pioneer, delivering new housing, innovating, maintaining the safety, the look and the feel of our homes, listening to residents and acting on their feedback, and tackling homelessness.
136. Once again, the achievement of delivering a balanced plan in light of moving external factors beyond our control, particularly interest rates and inflation, is a substantial one. Though there must be flexibility to move and adapt our plans, the fundamental principles behind the plan are understood by all and it is with those as the guide that all officers will ensure the viability of the services provided.

Portfolio Holder for Finance, Cllr Neil Shorter

137. This report has been compiled at a time of much uncertainty and moving goalposts. Yet once again officers have been able to lay out a clear and well-argued path as to the stability of the HRA Business Plan. That they have been able to do so, with the specialist external support, is some achievement and illustrates the strength of our knowledge and skillsets in the Housing and Finance departments. I am pleased to see that corporate objectives can still be delivered upon despite the environment in which we are operating.

Contact and Email

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Appendix B

Description	2022.23	2023.24	2024.25	2025.26	2026.27	2027.28	2028.29	2029.30	2030.31	2031.32
Income										
Gross Rental Income	£27,873	£29,858	£31,699	£32,313	£32,851	£33,785	£35,327	£35,913	£36,683	£37,287
Void Losses	-£355	-£380	-£372	-£347	-£353	-£363	-£379	-£386	-£394	-£400
Other Rental Income	£4	£5	£5	£5	£5	£5	£5	£5	£5	£6
Tenanted Service Charges	£1,079	£1,141	£1,183	£1,215	£1,247	£1,281	£1,307	£1,333	£1,360	£1,387
Leasehold Service Charges	£139	£147	£152	£156	£160	£165	£168	£171	£175	£178
Non-Dwelling Income	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Grants	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
RTB - Administration	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Other Income	£3,035	£3,037	£3,038	£3,039	£3,040	£3,042	£3,042	£3,043	£3,044	£3,045
Total income	£31,775	£33,806	£35,705	£36,381	£36,952	£37,914	£39,470	£40,080	£40,873	£41,503
Expenditure										
General Management	-£10,174	-£11,376	-£11,756	-£11,952	-£12,179	-£12,412	-£12,723	-£13,041	-£13,368	-£13,703
Special Management	-£1,048	-£1,158	-£1,207	-£1,237	-£1,271	-£1,306	-£1,337	-£1,369	-£1,402	-£1,436
Other Management	-£871	-£1,036	-£1,077	-£1,093	-£1,115	-£1,138	-£1,160	-£1,184	-£1,207	-£1,231
Bad Debt Provision	-£200	-£214	-£227	-£232	-£236	-£242	-£253	-£258	-£263	-£268
Responsive & Cyclical Repairs	-£4,854	-£6,059	-£6,735	-£6,875	-£7,059	-£7,271	-£7,458	-£7,662	-£7,859	-£8,108
Other revenue expenditure	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Total expenditure	-£17,147	-£19,843	-£21,003	-£21,390	-£21,860	-£22,370	-£22,932	-£23,514	-£24,100	-£24,746
Capital financing costs										
Interest paid on debt	-£4,052	-£4,216	-£4,242	-£4,440	-£4,921	-£5,463	-£5,616	-£5,648	-£5,858	-£5,912
Interest paid on 141 receipts	£0	£0	£0	£0	£0	£0	£0	-£349	-£457	-£499
Debt management expenses	-£80	-£92	-£96	-£97	-£99	-£101	-£103	-£105	-£107	-£109
Interest Received	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Depreciation	-£5,935	-£6,805	-£7,050	-£7,128	-£7,268	-£7,489	-£7,682	-£7,811	-£7,943	-£8,063
Capital financing costs	-£10,067	-£11,113	-£11,388	-£11,665	-£12,288	-£13,053	-£13,401	-£13,914	-£14,365	-£14,584
Appropriations										
Revenue provision (HRA CFR)	£0	-£3,850	-£3,132	-£3,372	-£2,885	-£2,664	-£3,024	-£2,786	-£2,414	-£2,149
RCCO	£0	-£1,635	£0	£0	£0	£0	£0	£0	£0	£0
Other appropriations	-£2,850	£0	£0	£0	£0	£0	£0	£0	£0	£0
Appropriations	-£2,850	-£5,485	-£3,132	-£3,372	-£2,885	-£2,664	-£3,024	-£2,786	-£2,414	-£2,149
Net income/ (expenditure)	£1,711	-£2,635	£181	-£46	-£82	-£173	£113	-£134	-£5	£25
HRA Balance										
Opening Balance	£2,119	£3,829	£1,194	£1,376	£1,329	£1,248	£1,075	£1,188	£1,054	£1,049
Generated in year	£4,561	-£2,635	£181	-£46	-£82	-£173	£113	-£134	-£5	£25
Appropriated in	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0
Appropriated out	-£2,850	£0	£0	£0	£0	£0	£0	£0	£0	£0
Closing Balance	£3,829	£1,194	£1,376	£1,329	£1,248	£1,075	£1,188	£1,054	£1,049	£1,074

Tenant Satisfaction Measures – Developed by the Regulator of Social Housing

Overall satisfaction

1. Overall satisfaction with the service provided by the landlord. Measured by tenant perception survey

Keeping properties in good repair

2. Satisfaction with repairs. Measured by: tenant perception survey
3. Satisfaction with time taken to complete most recent repair. Measured by: tenant perception survey
4. Satisfaction that the home is well-maintained. Measured by: tenant perception survey
5. Homes that do not meet the Decent Homes Standard. Measured by: landlords' management information
6. Repairs completed within target timescale. Measured by: landlords' management information

Maintaining building safety

7. Satisfaction that the home is safe. Measured by: tenant perception survey

Safety checks

8. Gas safety checks. Measured by: landlords' management information
9. Fire safety checks. Measured by: landlords' management information
10. Asbestos safety checks. Measured by: landlords' management information
11. Water safety checks. Measured by: landlords' management information
12. Lift safety checks. Measured by: landlords' management information

Respectful and helpful engagement

13. Satisfaction that the landlord listens to tenant views and acts upon them. Measured by: tenant perception survey
14. Satisfaction that the landlord keeps tenants informed about things that matter to them. Measured by: tenant perception survey
15. Agreement that the landlord treats tenants fairly and with respect. Measured by: tenant perception survey

Effective handling of complaints

16. Satisfaction with the landlord's approach to handling of complaints. Measured by: tenant perception survey
17. Complaints relative to the size of the landlord. Measured by: landlords' management information
18. Complaints responded to within Complaint Handling Code timescales. Measured by: landlords' management information

Responsible neighbourhood management

19. Satisfaction that the landlord keeps communal areas clean and well-maintained. Measured by: tenant perception survey
20. Satisfaction that the landlord makes a positive contribution to neighbourhoods. Measured by: tenant perception survey
21. Satisfaction with the landlord's approach to handling anti-social behaviour. Measured by: tenant perception survey
22. Anti-social behaviour cases relative to the size of the landlord. Measured by: landlords' management information.

Appendix D

Ashford Borough Council Homes built or acquired via s106 or off-plan since 2011 (n.b excludes street purchases)

Site	Properties (tenure = affordable rent unless specified)	Building	Status	Handover
Hunter Close, Ashford	3 x 2-bed houses	2 bed House	Completed	23-Mar-11
Towers View, Ashford	5 x 1-bed bungalows	1 bed Bungalow	Completed	31-Mar-11
Towers View, Ashford	3 x 2-bed houses	2 bed House	Completed	31-Mar-11
Towers View, Ashford	2 x 2-bed bungalows	2 bed Bungalow	Completed	31-Mar-11
Breadlands Road, Quarry Close, Willesborough	7 x 2-bed houses	2 bed House	Completed	27-Apr-11
Blake Court, Willesborough	3 x 3-bed houses	3 bed House	Completed	31-May-11
Gerlach House, Ashford	2 x 1-bed flats	1 bed Flat	Completed	31-May-11
Orchard View, Bethersden	3 x 2-bed bungalows	2 bed Bungalow	Completed	11-Oct-11
The Chennells, High Halden	4 x 1-bed flats	1 bed Flat	Completed	04-Nov-11
Nine Acres, Kennington	2 x 2-bed bungalows	2 bed Bungalow	Completed	11-Nov-11
Sotherton, Willesborough	4 x 1-bed flats (for people with learning difficulties)	1 bed Flat	Completed	17-Nov-11
Sotherton, Willesborough	1 x 1-bed bungalow (for a person with learning difficulties)	1 bed Bungalow	Completed	17-Nov-11
Arlington, Ashford	3 x 3-bed houses	3 bed House	Completed	01-Dec-11
Singleton Road, Ashford	4 x 2-bed houses	2 bed House	Completed	01-Dec-11
Bybrook Road, Ashford	2 x 3-bed houses	3 bed House	Completed	07-Dec-11
Bybrook Road, Ashford	1 x 3-bed house	3 bed House	Completed	20-Jan-12
Mardol Road, Ashford	3 x 3-bed houses	3 bed House	Completed	07-Dec-11
Mardol Road, Ashford	1 x 3-bed house	3 bed House	Completed	03-Feb-12
Cheeselands, Biddenden	5 x 2-bed bungalows	2 bed Bungalow	Completed	10-Feb-12
Beaver Lane, Ashford	2 x 2-bed houses	2 bed House	Completed	12-Mar-12
Luckley House, Wye	9 x 1-bed flats	1 bed Flat	Completed	26-Mar-12
Orion Way, Ashford	2 x 4-bed houses	4 bed House	Completed	26-Mar-12
Orion Way, Ashford	7 x 3-bed houses	3 bed House	Completed	26-Mar-12
Birling Road, Ashford	1 x 3-bed house	3 bed House	Completed	27-Sep-13
Christchurch Road, Ashford	8 x 1-bed bedsits (for use as temporary accommodation) – note these properties sit in the General Fund	1 bed Bedsit	Completed	29-Aug-14
Hawthorn, Appledore	4 x 2-bed flats	2 bed Flat	Completed	21-Nov-14
Hawthorn, Appledore	4 x 2-bed bungalows	2 bed Bungalow	Completed	18-Dec-14
Wind Hill, Charing	2 x 2-bed bungalows	2 bed Bungalow	Completed	18-Dec-14
Wind Hill, Charing	1 x 3-bed bungalow	3 bed Bungalow	Completed	18-Dec-14
Manse Field, Brabourne	2 x 3-bed houses	3 bed House	Completed	19-Dec-14
Randolph Gardens, Kennington	8 x 3-bed houses	3 bed House	Completed	19-Dec-14
Riverview, Ashford	3 x 2-bed houses	2 bed House	Completed	19-Dec-14
Riverview, Ashford	1 x 3-bed house	3 bed House	Completed	19-Dec-14
Arcon Road, Ashford	3 x 3-bed houses	3 bed House	Completed	30-Jan-15
Simons Ave, Ashford	3 x 3-bed houses	3 bed House	Completed	30-Jan-15
Cryol Road, Ashford	4 x 3-bed houses	3 bed House	Completed	27-Feb-15
Cryol Road, Ashford	2 x 4-bed houses	4 bed House	Completed	27-Feb-15
Cryol Road, Ashford	1 x 6-bed house	6 bed House	Completed	27-Feb-15
Poppy Fields, Charing	7 x 2-bed houses (shared ownership)	2 bed House	Completed	16-Nov-15
Poppy Fields	1 x 3-bed house (shared ownership)	3 bed House	Completed	16-Nov-15
Poppy Fields	13 x 3-bed	3 bed House	Completed	16-Nov-15
Farrow Court	81 x 1-bed flats (14 for those with learning difficulties)	1 bed Flat	Completed	20-Nov-15
Farrow Court	23 x 2-bed flats	2 bed Flat	Completed	20-Nov-15
Boxley, Ashford	2 x 3-bed houses	3 bed House	Completed	14-Dec-17
Noakes Meadow, Ashford	2 x 2-bed bungalows	2 bed Bungalow	Completed	19-Feb-18
Beecholme Drive, Kennington	2 x 3-bed houses	3 bed House	Completed	20-Mar-18
Priory Way, Tenterden	2 x 3-bed houses	3 bed House	Completed	20-Mar-18
Belmont Place, Ashford	3 x 2-bed flats	2 bed Flat	Completed	28-Mar-18
Jubilee Fields, Wittersham	4 x 3-bed houses	3 bed House	Completed	05-Dec-18
Brattle, Woodchurch	4 x 2-bed houses	2 bed House	Completed	13-Dec-18
Calland HRA 15-18	2 x 2-bed houses	2 bed House	Completed	19-Dec-18
Calland HRA 15-18	2 x 3-bed houses	3 bed House	Completed	19-Dec-18
Danemore, Tenterden	23 x 1-bed flats	1 bed Flat	Completed	15-Feb-19
Danemore, Tenterden	11 x 2-bed flats	1 bed Flat	Completed	15-Feb-19
Chequers Green, Shadoxhurst (*s106 acquisition)	2 x 2-bed houses (shared ownership)	2 bed House	Completed	01-Aug-19
Chequers Green, Shadoxhurst (*s106 acquisition)	2 x 2-bed houses	2 bed House	Completed	01-Aug-19
Kings Close, Shadoxhurst (*s106 acquisition)	4 x 1 bed flats	1 bed Flat	Completed	14-Oct-19
Kings Close, Shadoxhurst (*s106 acquisition)	1 x 2 bed house	2 bed House	Completed	14-Oct-19
Kings Close, Shadoxhurst (*s106 acquisition)	2 x 2 bed house (Shared Ownership)	2 bed house	Completed	14-Oct-19
Ragstone Hollow, Aldington	2 x 2-bed bungalows	2 bed Bungalow	Completed	11-Mar-20
Ragstone Hollow, Aldington	2 x 3-bed bungalows	3 bed Bungalow	Completed	11-Mar-20
The Weavers, Biddenden	2 x 2-bed chalet bungalows	2 bed Bungalow	Completed	13-Aug-20
Somerset Heights, (formerly known as New Quarter), West Block, Ashford (**off-plan acquisition)	23 x 1-bed flats	1 bed Flat	Completed	24-Nov-20
Somerset Heights, (formerly known as New Quarter), West Block, Ashford (**off-plan acquisition)	21 x 2-bed flats	2 bed Flat	Completed	24-Nov-20
Stour Heights, (formerly known as New Quarter), West Block, Ashford (**off-plan acquisition)	27 x 1-bed flats	1-bed flat	Completed	06-May-21
Stour Heights, (formerly known as New Quarter), West Block, Ashford (**off-plan acquisition)	38 x 2-bed flats	2-bed flat	Completed	06-May-21
East Stour Court	24 x 1-bed flats	1-bed flat	Completed	28-Sep-21
East Stour Court	5 x 2-bed flats	2-bed flat	Completed	28-Sep-21
Berry Place	15 x 1-bed flats	1-bed flat	Completed	22-Feb-22
Berry Place	16 x 2-bed flats	2-bed flat	Completed	22-Feb-22
Halstow Way	6 x 1-bed flats	1-bed flat	Completed	14-Jun-22
Halstow Way	7 x 2-bed flats	2-bed flat	Completed	14-Jun-22
Halstow Way	4 x 3-bed duplex apartments	3-bed duplex apartment	Completed	14-Jun-22

Equality Impact Assessment

1. An Equality Impact Assessment (EIA) is a document that summarises how the council has had due regard to the public sector equality duty (Equality Act 2010) in its decision-making. Although there is no legal duty to produce an EIA, the Council must have **due regard** to the equality duty and an EIA is recognised as the best method of fulfilling that duty. It can assist the Council in making a judgment as to whether a policy or other decision will have unintended negative consequences for certain people and help maximise the positive impacts of policy change. An EIA can lead to one of four consequences:

- (a) No major change – the policy or other decision is robust with no potential for discrimination or adverse impact. Opportunities to promote equality have been taken;
- (b) Adjust the policy or decision to remove barriers or better promote equality as identified in the EIA;
- (c) Continue the policy – if the EIA identifies potential for adverse impact, set out compelling justification for continuing;
- (d) Stop and remove the policy where actual or potential unlawful discrimination is identified.

Public sector equality duty

2. The Equality Act 2010 places a duty on the council, when exercising public functions, to have due regard to the need to:
- (a) Eliminate discrimination, harassment and victimisation;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

Appendix E to December 2022 Cabinet report

3. These are known as the three aims of the general equality duty.

Protected characteristics

4. The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership*
 - Pregnancy and maternity
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation

*For marriage and civil partnership, only the first aim of the duty applies in relation to employment.

Due regard

5. Having 'due regard' is about using good equality information and analysis at the right time as part of decision-making procedures.
6. To 'have due regard' means that in making decisions and in its other day-to-day activities the council must consciously consider the need to do the things set out in the general equality duty: eliminate discrimination, advance equality of opportunity and foster good relations. This can involve:
- removing or minimising disadvantages suffered by people due to their protected characteristics.
 - taking steps to meet the needs of people with certain protected characteristics when these are different from the needs of other people.
 - encouraging people with certain protected characteristics to participate

in public life or in other activities where it is disproportionately low.

7. How much regard is 'due' will depend on the circumstances. The greater the potential impact, the higher the regard required by the duty. Examples of functions and decisions likely to engage the duty include: policy decisions, budget decisions, public appointments, service provision, statutory discretion, decisions on individuals, employing staff and procurement of goods and services.
8. In terms of timing:
 - Having 'due regard' should be considered at the inception of any decision or proposed policy or service development or change.
 - Due regard should be considered throughout development of a decision. Notes shall be taken and kept on file as to how due regard has been had to the equality duty in research, meetings, project teams, consultations etc.
 - The completion of the EIA is a way of effectively summarising this and it should inform final decision-making.

Case law principles

9. A number of principles have been established by the courts in relation to the equality duty and due regard:
 - Decision-makers in public authorities must be aware of their duty to have 'due regard' to the equality duty and so EIA's must be attached to any relevant committee reports.
 - Due regard is fulfilled before and at the time a particular policy is under consideration as well as at the time a decision is taken. Due regard involves a conscious approach and state of mind.
- A public authority cannot satisfy the duty by justifying a decision after it has been taken.
- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.

- The duty is a non-delegable one. The duty will always remain the responsibility of the public authority.
- The duty is a continuing one so that it needs to be considered not only when a policy, for example, is being developed and agreed but also when it is implemented.
- It is good practice for those exercising public functions to keep an accurate record showing that they have actually considered the general duty and pondered relevant questions. Proper record keeping encourages transparency and will discipline those carrying out the relevant function to undertake the duty conscientiously.
- A public authority will need to consider whether it has sufficient information to assess the effects of the policy, or the way a function is being carried out, on the aims set out in the general equality duty.
- A public authority cannot avoid complying with the duty by claiming that it does not have enough resources to do so.

The Equality and Human Rights Commission has produced helpful guidance on "Meeting the Equality Duty in Policy and Decision-Making" (October 2014). It is available on the following link and report authors should read and follow this when developing or reporting on proposals for policy or service development or change and other decisions likely to engage the equality duty. [Equality Duty in decision-making](#)

Lead officer:	Mark James
Decision maker:	Cabinet
Decision: <ul style="list-style-type: none"> • Policy, project, service, contract • Review, change, new, stop 	<p>Agree the priorities of the HRA as set out in the Business Plan report</p> <p>Agree that decisions for acquisitions are taken on a case-by-case basis within the existing delegation afforded to the Assistant Director for Housing giving due regard to the HRA Business Plan and its priorities</p> <p>Agree that the Council proceeds at risk with procurement where necessary to accelerate delivery on specific projects</p> <p>Authorise the Solicitor to the Council and Monitoring Officer to negotiate, finalise and complete necessary legal agreements and other documents to effect the above</p>
Date of decision: The date when the final decision is made. The EIA must be complete before this point and inform the final decision.	15 th December 2021
Summary of the proposed decision: <ul style="list-style-type: none"> • Aims and objectives • Key actions • Expected outcomes • Who will be affected and how? • How many people will be affected? 	<p>Agree the priorities of the HRA as set out in the Business Plan report</p> <p>Agree that decisions for acquisitions are taken on a case-by-case basis within the existing delegation afforded to the Assistant Director for Housing giving due regard to the HRA Business Plan and its priorities</p> <p>Agree that the Council proceeds at risk with procurement where necessary to accelerate delivery on specific projects</p> <p>Authorise the Solicitor to the Council and Monitoring Officer to negotiate, finalise and complete necessary legal agreements and other documents to effect the above</p>
Information and research: <ul style="list-style-type: none"> • Outline the information and research that has informed the decision. • Include sources and key findings. 	<p>Building on solid foundations: delivering affordable homes in Ashford – delivery plan for 2019-2023</p> <p>Housing Strategy Framework Priority 1 – Improve the supply of affordable housing to meet local housing needs in urban and rural areas, and Housing Statement 2018-2023</p> <p>Reform of Housing Revenue Account (HRA) – Cabinet endorsed five key priorities for further spend, as a result of greater freedom within the HRA.</p> <p>National Housing Strategy 2011 – delivering new homes under the affordable rent model.</p> <p>A Charter For Social Housing Residents – Social Housing White Paper 2020.</p> <p>A Guide to Developing Affordable Homes in Rural Communities (Kent Housing Group [KHG]) – February 2021</p> <p>Housing Ombudsman Service – Spotlight on: Damp & Mould</p>
Consultation: <ul style="list-style-type: none"> • What specific consultation has occurred on this decision? 	<p>Consultation will continue to be held with ward members where acquisitions or proposals for development fall within their ward boundaries. As mentioned previously this has led to good outcomes and the engagement of ward members is always appreciated to help shape development schemes in</p>

<ul style="list-style-type: none"> • What were the results of the consultation? • Did the consultation analysis reveal any difference in views across the protected characteristics? • What conclusions can be drawn from the analysis on how the decision will affect people with different protected characteristics? 	<p>particular. All sites within any future delivery programme are subject to planning approval and the formal consultation process as part of that. Consultation will take place with local residents and ward members, before proposed plans are submitted, giving them an additional opportunity to respond to the proposals outside of the formal planning consultation process.</p> <p>Consultation, or rather engagement and conversation, with tenants is clearly required as the Council develops its tenant engagement plans, in line with the requirements in the Social Housing Regulation Bill. This is a focal point of the Council's HRA priorities and both at a strategic and operational level, the involvement of residents living in Council-owned homes will improve.</p> <p>The Council will also consult, with those whose homes are part of the Social Housing Decarbonisation Fund bid. It is paramount that this work is undertaken and, as identified, engagement here is one of the keys to the success of delivering the necessary outcomes.</p>
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Assess the relevance of the decision to people with different protected characteristics and assess the impact of the decision on people with different protected characteristics.

When assessing relevance and impact, make it clear who the assessment applies to within the protected characteristic category. For example, a decision may have high relevance for young people but low relevance for older people; it may have a positive impact on women but a neutral impact on men.

Protected characteristic	Relevance to Decision High/Medium/Low/None	Impact of Decision Positive (Major/Minor) Negative (Major/Minor) Neutral
<u>AGE</u> Elderly	High	Positive (major)
Middle age	High	Positive (major)
Young adult	High	Positive (major)
Children	High	Positive (major)
<u>DISABILITY</u> Physical	High	Positive (major)
Mental	High	Positive (major)
Sensory	None	Positive (major)
<u>GENDER RE-ASSIGNMENT</u>	None	Neutral
<u>MARRIAGE/CIVIL PARTNERSHIP</u>	None	Neutral

<u>PREGNANCY/MATERNITY</u>	None	Neutral
<u>RACE</u>	None	Neutral
<u>RELIGION OR BELIEF</u>	None	Neutral
<u>SEX</u> Men	None	Neutral
Women	None	Neutral
<u>SEXUAL ORIENTATION</u>	None	Neutral

Mitigating negative impact: Where any negative impact has been identified, outline the measures taken to mitigate against it.	Where the assessment has been carried out above it is on the basis of the new developments planned and new acquisitions in the pipeline.
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Is the decision relevant to the aims of the equality duty?	
Guidance on the aims can be found in the EHRC's Essential Guide , alongside fuller PSED Technical Guidance .	
Aim	Yes / No / N/A
1) Eliminate discrimination, harassment and victimisation	N/A
2) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it	Yes
3) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it	N/A

Conclusion:	
<ul style="list-style-type: none"> Consider how due regard has been had to the equality duty, from start to finish. There should be no unlawful discrimination arising from the decision (see guidance above). Advise on whether the proposal meets the aims of the equality duty or 	<p>Due regard has been considered throughout this proposal to each protected group.</p> <p>No unlawful discrimination has arisen from the decision.</p> <p>The effect on the community will be positive due to the aims of the programme delivery. No adjustments required.</p>

<p>whether adjustments have been made or need to be made or whether any residual impacts are justified.</p> <ul style="list-style-type: none">• How will monitoring of the policy, procedure or decision and its implementation be undertaken and reported?	<p>The programme will be monitored by a Housing Project group with regular updates to our Portfolio Holder and Cabinet.</p>
<p>EIA completion date:</p>	<p>25th November 2022</p>