



Annex A

City of York Council Housing Revenue Account 30 Year Business Plan: 2017-47

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Abbreviations

HB	Housing Benefit
HCA	Homes & Communities Agency
HMO	Housing Management Officer
HRA	Housing Revenue Account
LHA	Local Housing Allowance
RTB	Right to Buy
UC	Universal Credit

Foreword

We are pleased to introduce the 2017 revision of our Housing Revenue Account (HRA) Business Plan for the 30 year period 2017-47, which sets out our priorities, plans and actions for council housing in our city. This Plan will continue to be reviewed regularly.

Its purpose is to demonstrate that the council can maintain its housing assets, and deliver the levels of service, home and neighbourhood improvements set out in it whilst keeping the HRA in a positive balance.

The priorities and programmes must be seen within the broader context of public sector savings that need to be made by the council. For the HRA, savings of £1.5m were identified in the original Business Plan for the four year period to 2019/20. This is currently on track with £1.065m delivered to 2017/18 and the balance of £0.435m being delivered over the next two years.

There have been fundamental policy and legislative changes in recent years that directly or indirectly affect the Plan. A key priority of this refresh is to reflect those changes and ensure that the Plan continues to support delivery of our key aims and priorities over the next five years and beyond.

It needs to be read in conjunction with the HRA Strategic Asset Plan which itself will be refreshed in the next twelve months. This sets out the priorities for the physical care and improvement of the housing stock and related housing

assets. It provides a framework within which decisions on investment or disinvestment are made. This Business Plan draws upon the stock condition information and data analysis used in the HRA Strategic Asset Plan.

A sound Business Plan has become more critical since the reform of Local Government housing finance with the introduction of the self-financing regime from April 2012. This required that local authorities take on a one-off debt, in York's case £121.5m and in return keep all its future revenue income except for a proportion of right to buy (RTB) receipts that are still pooled and returned to central government. It is therefore critical that the HRA continues to be managed on solid business principles.

The reforms opened up some exciting avenues for York and the council has used the opportunity to build much needed new council housing in recent years. It has provided flexibility to develop significant future ambitions through an accelerated housing programme in partnership with the Homes & Communities Agency (HCA) announced in early 2017 - contributing to the council's aim to create a prosperous city for all - where local businesses can thrive and residents have good quality jobs, housing and opportunities - and a council that listens to its residents.

The 30 year financial model assumes levels of investment to ensure that properties are maintained to the standards within the HRA Strategic Asset Plan.

The Business Plan summarises the national and

local strategic context and corporate priorities under which we operate. This framework has enabled us to identify our challenges and priorities specifically over the next five years as well as identifying longer terms issues and goals for the next thirty years.

Demand for social housing remains high, particularly for family homes and therefore the Plan sets out the council's aspiration to build new council housing of the types needed.

Progress in meeting the priorities of the Plan is given in the sections that follow.

Introduction

Background

This Plan covers the 30 year period 2017-47. It focuses largely on those activities relevant to the management of the council's housing related assets and the challenges facing key service delivery areas and contains an investment programme, formulated on a 5 year and a 30 year basis.

The Strategic Asset Plan is a key component of the HRA Business Plan which balances the competing investment needs in the existing housing stock, investment in new affordable housing delivery and investment in housing management services.

The council recognises that the national housing crisis has a specific and sharp local dimension which impacts negatively

on our communities and the growth potential of our economy which needs a readily available and diverse housing supply at different price.

York is an area of high property values, both to buy and rent, with intense demand for social housing. This means that the council does not have great difficulty when letting vacant property. We do still need to anticipate and, where possible, halt obsolescence in our stock and maintain housing to a standard which is attractive to potential tenants, meets the changing nature of household formation and responds to other demographic or cultural issues. With land for redevelopment at a premium, both in cost and availability, an element of re-development of existing stock is also part of the Plan.

The council put forward significant proposals in early 2017 to step up the pace of delivery of new homes through a strategic partnership with the HCA. It represents a fundamental shift in the ambition of the council to play a more active role in the delivery of wider housing solutions through the use of council owned land. It seeks to build on the partnership with the HCA to support the development of York Central and to use the HCA's Housing Infrastructure Fund to bring forward brownfield sites needing infrastructure or remediation investment.

Housing Revenue Account

From 2012 the funding model for local authority housing changed radically. The abolition of the HRA subsidy system,

a national mechanism for redistributing housing resources, was replaced with a locally managed 'self financing' system. Local authorities now retain all rental income from their housing assets, alongside the responsibility for managing, maintaining and improving the housing stock and supporting an opening level of debt that was allocated to each authority.

HRA reform placed councils in control of their housing assets and opened up a range of options for unlocking HRA investment capacity that remain consistent with the government's priority to control the national debt. The key aspects of HRA reform relevant to York were that:

- Efficient operation of the HRA would generate an investment fund for new investment.
- Under the agreed settlement in 2013 a £20m investment and regeneration fund was made available over the first years of the Business Plan to support our priorities including building new council housing.
- Housing will become a real asset capable of generating additional investment resources for new and improved social and affordable housing.
- Councils will be able to shape their "housing business" to deliver against their local service and investment priorities.

Table 1: Key Investment decisions

<ul style="list-style-type: none"> ○ £20m set aside to invest in new or improved provision from 2013 has been spent or committed against key programmes
<ul style="list-style-type: none"> ○ £20m will be invested in new development for the next five years to 2023, allowing up to £8.5m RTB receipts to be invested in new homes (if our full £20m was set aside for eligible expenditure)
<ul style="list-style-type: none"> ○ £43.2m will be invested over the next five years to maintain and improve our tenants' homes
<ul style="list-style-type: none"> ○ £31m will be invested in responsive repairs and cyclical maintenance over the same period.
<ul style="list-style-type: none"> ○ £1.77m will be invested in a new integrated IT system to radically improve service delivery

National Policy Context

Housing Policy

The Localism Act 2011 and the Welfare Reform Act 2012 taken together have had wide ranging implications for social landlords as has further key legislation such as the 2016 Housing & Planning Act and government spending priorities and decisions.

The Localism Act included measures on how social housing is allocated, the introduction of self-financing for all local authority housing and regulatory reform for the social housing sector. Specifically this included:

- Require local authorities to produce a tenancy strategy, which will affect the allocation of social housing.
- Abolition of the HRA subsidy system and the introduction of self-financing for all local authority housing.
- Regulatory reform including the introduction of complaints and tenant panels.

The Government elected in May 2015 introduced fundamental and wide ranging changes to the funding, definition and delivery of affordable housing. Not all the changes introduced in the July 2015 Budget and the Housing and Planning Act 2016 have been implemented so there is uncertainty about whether some of the Government's proposals will take effect but the 1% rent reduction for four

years is in place.

Whilst the proposals for 'pay to stay' for higher income households have been dropped there remains uncertainty about the ending of secure 'lifetime' tenancies and the extension of RTB to housing association tenants funded by the sale of high value council housing stock. The latter proposal has been modelled as reducing the HRA by £44m over thirty years.

There has, however, also been an unmistakeable change in tone in the Government's language and priorities since mid-2016 following the EU Referendum vote, change of Prime Minister and the 2017 election. All this, coupled with increasing calls to tackle the housing crisis and the aftermath of the Grenfell Tower fire has led to potentially significant changes to the policy landscape. This includes the 2017 Homelessness Reduction Act (effective from April 2018), the February 2017 Housing White Paper, *'Fixing our broken housing market'*, which acknowledged the scale of the problems facing the housing sector and the promise, made in October 2017, of a Social Housing Green Paper said to be a *'wide ranging, top-to-bottom review of the issues facing the sector'*.

There has been a shift to accepting an increased role for the affordable and council home sector – ownership/private renting is no longer seen as the only solution. This is backed up a number of announcements made in October 2017: an additional £2bn for "affordable housing", with funding for social rented homes in areas "where need is greatest" (bringing the total to £9.1bn); a return to the rent increase

formula of CPI + 1% from 2020-25 after 4 years of annual 1% rent reductions and the decision to abandon proposals to limit the maximum amount of help paid through HB/UC to social tenants to LHA rates from 2019.

Welfare Reform

The 2012 Welfare Reform Act and subsequent announcements introduced the biggest shake up of the welfare system since its inception. A central tenet of the programme is to reduce the overall benefits bill and make work pay. The Act, along with subsequent measures, has impacted on tenants who claim benefits, their landlords, local housing markets and a range of agencies providing money and benefits advice. The key changes include:

- Creation of Universal Credit (UC) for those of working age which will replace six existing benefits, including, crucially, Housing Benefit (HB), and will put at risk our ability as a landlord to collect rents.
- Payment of the housing element of UC direct to tenants thereby ending automatic direct payment to social landlords which existed under HB.
- Capping the maximum Local Housing Allowance (LHA) payable to private sector claimants thereby exacerbating the problems of affordability within the private rented sector.
- Increases in non-dependant deductions.
- Removal of the so-called 'Spare Room Subsidy' for working age social tenants (commonly referred to as the 'bedroom tax') thereby restricting HB (and UC) so it only covers the size of property they are deemed to need.

- Calculating LHA rates (used for HB and UC claims for private tenants) using the 30th percentile of market rents rather than the 50th percentile and indexed to the Consumer Price Index from April 2013. The rates were then frozen for four years from April 2016.
- Raising the shared accommodation rate age limit from 25 years to 35 years thereby reducing the maximum amount of help available for tenants of this age group.
- Ending the automatic eligibility to claim help with housing costs under UC for 18 – 21 year olds.

A significant risk for the Plan is the collection of rental income and we predicted that rent arrears would increase because of the impact of the welfare reform changes and this has been the case with arrears for 2016/17 at 2.19% up from 1.59% in 2012/13. The previously revised bad debt provision of 1.5% is considered sufficient for the present.

The Government from May 2015 made further reductions in welfare provision as well as other reforms that impact on HRA business planning. These include:

- Lowering the benefit cap to £20k p.a. outside London from November 2016.
- Freezing working age benefits for two years from April 2016.
- Restricting EU migrants' right to social housing until they have lived in an area for four years.
- Continuing the roll out of UC.
- Continuing with the 'spare room subsidy' charge.
- Reducing working tax credits.
- Restricting child tax credits or UC being paid for more

than two children in most cases.

- Proposals to apply LHA rates to all social tenants claiming HB/UC from April 2019 (dropped in October 2017).

In addition, the national funding model for Supported Housing is currently under review and two further consultations on proposals will close in January 2018.

Although government made a commitment in July 2016 to there being no new welfare reform measures, all existing changes remain in place. The full effect of many will be felt through to 2020 placing a strain on lower income households.

Welfare reform changes will impact on the levels of rent collected by the service and also on the sustainability/turnover of tenancies. Moreover, the other government changes – and especially the rent reduction and requirement to sell high value housing stock - will potentially have a much more direct and fundamental impact on the HRA Business Plan.

The cumulative impact of all these policy changes means that income into the HRA would be significantly reduced. This is a fundamental change to the assumptions made when the Business Plan was first published in 2013 and was reflected in the February 2016 refresh.

The Right to Buy (RTB)

The 2010 – 2015 coalition government increased the maximum RTB discount that tenants can receive to £77,000 (with inflationary increases this is now £78,600). In the last

two years (2015/16 and 2016/17) 147 council homes have been sold under the right-to-buy of which 75% were houses at a total discount of £9.48m generating receipts of £11.2m.

Extending the RTB to housing association tenants under the Housing & Planning Act 2016 requires councils to sell their “high value” housing stock with the receipts being used by government to compensate housing associations for the cost of selling their homes.

The legislative details of the proposals are yet to be unveiled and the Government intends to run a twelve month regional pilot of the scheme first which is expected to start during 2017/18. However, implementation will have a very significant impact on the HRA and reduce considerably the opportunity for investment in new housing in future years.

Devolution

The government have signalled an intention to support further devolution of governance to regions. This may be a catalyst for shared services across housing providers in the region and could give social housing a greater collective voice for funding opportunities. These opportunities will be considered as and when more detail emerges.

Local Policy Context

The Business Plan is guided by the council's Corporate Plan and contributes to a number of its aims. The Business Plan must be viewed in conjunction with the HRA Strategic Asset Plan.

The HRA Business Plan in Context



The Business Plan sets out the investment required to:

- Maintain our housing stock to provide good quality

sustainable council homes to meet a range of needs for today and future generations.

- Achieve and maintain high standards of housing management and effective tenant involvement.
- Assist people in housing need to access social housing and to offer support to help vulnerable tenants to maintain their tenancy and independent living.
- Respond to and pre-empt changing demand patterns, maintaining a balanced portfolio of housing to address a wide range of needs.
- Increase the environmental sustainability of the council's housing stock.
- Deliver the investment programme in a cost effective manner in accordance with sound procurement principles.

Strategic Aims and Priorities

The HRA Business Plan supports our vision “creating homes, building communities” and aligns with the following plans and strategies:

- Council Plan 2015-19.
- York, North Yorkshire and East Riding Housing Strategy 2015-21.
- Supported Housing Strategy 2014-19.
- A City Partnership to Prevent Homelessness 2013-2018.
- Tenancy Strategy 2013-18.
- HRA Strategic Asset Plan.
- Local Area Teams delivery model.

The Business Plan will contribute to meeting the council's three wider strategic aims in the Council Plan:

- A prosperous city for all.
- A focus on frontline services.
- A council that listens to residents.

The new service delivery structure will fundamentally support the council's wider move towards breaking down departmental barriers and promote more effective and joined up delivery of services to achieve better outcome for residents. This will be evidenced in a number of ways including:

- Increasing the supply of new affordable homes and making the best use of existing homes.
- Providing facilities that support dedicated high quality care for people with specialist needs.
- Exploring opportunities to expand housing provision to the intermediate rented market.
- Ensuring that frontline services continue to prevent homelessness wherever possible and provide housing options advice to all vulnerable households.
- Developing community engagement and consultation activities so that our customers are directly involved in planning and influencing services.
- Reducing levels of financial and social exclusion by relieving the pressure on family budgets, helping disadvantaged individuals to access cost effective financial products and tools.
- Developing and supporting sustainable solutions to

improve the financial capacity and capability of individuals and communities, reduce levels of debt and raise awareness of benefit entitlement.

- Implementing a comprehensive customer profiling system, tracking specific customer needs around financial inclusion, identifying when client groups will require intervention/support and how they are likely to access it.
- Creating financial support packages which effectively help vulnerable and marginalised families, individuals and communities in settings that are comfortable and familiar to them.
- Working more closely with partners and stakeholders to tailor support to meet individual needs.

Alternative Service Delivery Models

The housing service has explored ways of improving the efficiency of its front line delivery and reducing costs. This is part of a council-wide initiative to look at other delivery models for services including outsourcing.

The Executive approved an appraisal of alternative service delivery models for housing in October 2016. With the shift in the national policy landscape signalling a broader acceptance of the need for more social housing there is no longer a requirement to conduct such an appraisal.

The council can still achieve its ambitions whilst retaining ownership of its stock and within its HRA plans without the disruption, expense and uncertainty of a stock options appraisal. Stock retention and using the HRA to buy from

the proposed property development company supports the council's strategic approach. It also recognised that there was no appetite for such an option and that overall tenant satisfaction levels with the service are high.

The service has, however, introduced, from October 2017, a new structure for the delivery of its housing management function designed to reconfigure its services to better meet customers' needs by focussing on the front line, actively promoting tenancy sustainment, help deliver wider council initiatives and approaches and meet savings targets.

Financial Summary

The introduction of self financing resulted in the council taking on £121.5m of additional debt from central government in March 2012. However, it also means the council no longer has to pay the government an annual negative subsidy payment which was in the region of £7m.

In taking on this debt the council considered all options as part of its decision making and more information is in the Treasury Management section of this Plan. Details of the current revenue / capital projections are set out in Annex A.

Given the nature of the Plan there are clear financial risks that need to be considered in making any projections. In addition, the long term impact of the policy changes mentioned earlier are not fully known and there remains a degree of uncertainty around some of the assumptions that have been made. These assumptions will continue to be monitored and refined as more details become clear to

ensure the Plan is robust and sustainable.

Table 2: Key financial assumptions underpinning the Plan

Key Area	Assumption	Comment
General inflation	2.0%	
Rent increase inflation	-1.00% to +3.00%	Rent increases assumed in line with proposed government guidelines of CPI plus 1%
External borrowing interest rate	3.25% to 3.98%	Portfolio of fixed rate maturity loans with PWLB
Minimum HRA balance	£15m	Recognise risk in self financing environment
Sales of high value stock	40 p.a.	Based on current assumptions regarding detail of legislation and geography under which 'high value' is calculated
Right to buy sales	60 p.a. reducing to 40 p.a. over time	In line with sales forecast
Void rate	0.9%	In line with current position, no significant increase/decrease forecast
Bad debts	1.5%	To allow for changes under welfare reform

In order to manage the HRA with the reduced levels of income as a result of the four years of 1% rent decreases through to 2019/20 and the increased levels of sales forecast, savings of £1.5m over four years were identified and are in the process of being delivered.

Key Investment Commitments 2018 - 2023

The key financial investment points within the Business Plan are:

- £20m to spend on new homes for rent and redevelopment of existing stock between 2018-2023 (£10m is from the working balance of the HRA, £9m housing capital receipts and £1m commuted sums)
- £43.2m to be invested in existing council homes over the next five years
- £31m to be invested in responsive repairs and cyclical maintenance over the next 5 years.

Within the £43.2 million the following work programmes will be carried out:

- £10.4m to be spent on modernising 1,100 homes.
- £6.89m allocated to replace heating systems to 3,000 homes.
- £2.2m of funding to adapt properties enabling elderly and disabled tenants to remain in their homes.
- £3.1m will be spent on a programme renewing decayed water mains in our ownership, (with c 75% of this cost being funded by owner occupiers as a

- condition of sale by the council).
- £1.16m has been allocated to remedy electrical faults arising from systematic testing of fixed electrical installations across the portfolio.
- £1.64m to be spent on replacing roof coverings including the removal of asbestos containing materials to soffits, fascias and rainwater goods.
- £0.36m to be spent on fire remediation works arising from Fire Risk Assessments.
- £0.39m is programmed to upgrade energy insulation to external walls.
- £4.4m will be spent on a programme of damp remediation, which will include Tenants Choice works also being carried out at the same time to the majority of properties.

Investment Challenges

Overview

When considering the delivery of the strategic aims of the Business Plan there are a number of identified key areas that require investment and where relevant key messages from the HRA Strategic Asset Plan have been included.

These key areas cover:

- New build
- Building/asset management
- Landlord services
- Supported housing & Adaptations.
- Resident and community involvement
- Investment in ICT

Further details are below along with contextual information and a summary of key messages, which identify areas for improvement and investment and the subsequent priorities to address this.

Context

York is a growing city with the number of people living here increasing from 177,100 to 208,400 between 1999 and 2017. Latest projections for population growth suggest an increase for the period 2012 – 2032 in the range 224,081 to 231,769¹. The largest growth in population is projected for

¹ Report to Executive 13/7/17 – SHMA addendum update May 2017

people aged 60 and over rising by 16,500 (36%) between 2012 and 2031 and those aged over 75 to increase by 56%. Demand for housing across all tenures is high as is the cost and meeting that demand remains a challenge.

Levels of home ownership have declined but still represent by far the largest tenure at around 65% of all households (as at 2011 Census). House prices are some of the highest in North Yorkshire - households need an income of £41,100 p.a. to purchase an 'entry level' home at the lower quartile average cost of £160,000. To rent a lower quartile property at £575 per month would need an income of between £17,250 and £27,600 depending on the affordability threshold (usually between 25% and 40%).² The average York house price is 9.6 times greater than average earnings putting home ownership out of the reach of many.

The private rented sector comprises around 20% of the housing stock. Rents are high at above both national and regional averages – in 2016/17 the average rent in York was £866 compared to £573 for the region and £852 for England³, an increase not mirrored by the rise in earnings over the same period. Access to the private rented sector by low income households is restricted by Local Housing Allowance (LHA) rates being capped at the 30th percentile of rents (meaning that less than one in three homes in this sector are affordable to those households in receipt of HB/UC) and then frozen from 2016.

² Report to Executive 16 Mar 2017 - 'Strategic Partnership with the HCA for the Accelerated Delivery of Housing'

³ Private rent statistics 2016/17 Valuation Office 26/7/17

Social housing (both council and housing association) comprises around 15% of the stock. At the end of March 2017 there were 1,597 households registered for social housing in York. From a stock of 7,694 homes the council averages around 500 lettings per year.

The council's pre-publication draft of the Local Plan, currently out for consultation, proposes that 867 additional homes, including the provision of affordable housing, are needed in York each year until 2032, in order to address the backlog of demand and newly arising need.

The existing council house building programme has allowed the council to take a leadership role within the city and support the priorities in the Council Plan. Through a programme of HRA investment 54 new build council homes have been completed since 2015, with a further 27 due by the end of 2017. The programme continues and a number of 'pipeline' sites are currently being progressed.

The strong housing market in York also presents opportunities for the council to invest in new build homes confident in the knowledge that demand for these homes will be strong across all tenures.

Building New Council Housing

In the original Business Plan a £20m fund was created from the HRA allowing a further £18m to be brought in from other funds such as Homes and Communities Agency (HCA) regeneration funds, RTB receipts, and the use of affordable housing commuted sums to allow a new build programme of

council housing to be established.

The initial focus has been on bringing forward vacant sites within the ownership of the HRA but we will also consider, subject to the business case being robust, the remodelling and in some cases demolition of existing stock to create new homes that better meet the needs of residents and optimise the use of the land in HRA ownership.

A number of sites were assessed as suitable for development with the potential to deliver up to 71 new homes. Initial achievements include the delivery of new homes at:

- Beckfield Lane (18 council homes, 9 homes for open market sale) May 2015
- Hewley Avenue (8 homes,) Jan 2016
- Fenwick Street (8 homes) Summer 2017
- Pottery Lane (6 homes) Feb 2017
- Lindsey Avenue (14 homes – off the shelf purchase from a developer) Dec 2015

Plans are advanced for new homes in:

- Newbury Avenue (5 homes)
- Chaloners Road (6 homes)

In addition we have secured £2.76 million in Government funding via the HCA for a new affordable housing plan to help secure 65 new affordable homes. It will see some properties bought on the open market and other new build homes available for shared ownership.

Table 3: details of the £20m 2013 – 2018 investment programme

Project	Total Cost	HRA funded
Phase 1		
Beckfield Lane	£3.59m	£1.44m
Hewley Avenue	£1.09m	£0.22m
Fenwick Street	£1.53m	£0.74m
Newbury Avenue	£1.13m	£0.79m
Chaloners Road	£1.41m	£0.99m
Pottery Lane	£1.10m	£0.40m
Pack of Cards (Lindsey Avenue)	£1.76m	£0.33m
Sub-total	£11.61m	£4.91m
Phase 2		
Phase 2 feasibility study	£0.03m	£0.03m
Glen Lodge	£4.15m	£2.94m
James House (inc. Ordnance Lane)	£10.91m	£5.41m
Shared ownership	£5.52m	£2.76m
Marjorie Waite Court	£5.65m	£3.95m
Sub-total	£26.26m	£15.09m
OVERALL TOTAL	£37.87m	£20.00m

The table above details the building programme which shows that £20m HRA investment has supported a gross spend of £37.87m. The balance of funding came from HCA grant, RTB receipts, other capital receipts and commuted sums.

In July 2015 the council's Executive approved the Older Person's Accommodation Programme which is designed to respond to the projected growth in the population over 75 and the inadequate supply of suitable accommodation. It is projected to halt the shortfall by 2020 by increasing the net provision by 682 units⁴ but further work will be needed in the following decade to keep pace with the growing older persons' population. Further details of the programme are in the 'Supported Housing' section of this document.

There are now very few vacant and developable sites within the HRA with the capacity to build more than one or two homes. Small infill sites such as these do not provide the economy of scale necessary for a cost effective development programme and a more strategic approach is required. This includes option appraisals for the remodelling and demolition of existing HRA stock where this is of relatively poor quality or design, unpopular, or 'land hungry' and would thus enable a better quality, more sustainable and sometimes net increase in homes to be re-provided.

We also successfully bid for an Estate Regeneration Grant of £265k from the HCA to carry out feasibility work on improvements to The Groves area, home to 340 households.

⁴ Report to Executive 28/9/17

Our New Ambitions

The council has recognised that more needs to be done to expand the housing stock across all tenures and to accelerate the pace of housing delivery particularly by using surplus public sector land assets. We want to be able to continue with and accelerate the delivery of new housing schemes and to support the housing delivery company that the council intends to set up as part of its wider move to influence the housing market in York and generate income.

We also intend to enter into a Memorandum of Understanding with the HCA to establish a strategic partnership for housing development and investment. Five sites have already been identified for consideration under the Accelerated Construction programme. It is probable that the council will need to set up an arms length trading company in order to directly deliver housing outside the HRA or enter into a joint venture to do so. One option could be the use of HRA funds to purchase properties developed through this partnership by the development company.

Delivering our ambitious programme is dependent on the business case remaining robust and monitoring closely the future impact of the sale of 'high value' stock policy.

A strong combined HRA Strategic Asset Plan & Corporate Asset Management Plan will ensure we make the right decisions on investing in capital funding for new homes.

Any decisions regarding investment in either new build or remodelling will be reported through the Corporate Asset

Management Board to ensure opportunities for joint investment and land swaps are maximized, thereby ensuring effective corporate use of all our combined assets.

Identifying funding and ensuring value for money

The flexibilities as a result of the HRA Self Financing regime and the resulting investment/regeneration fund, alongside opportunities to borrow against future rental streams was anticipated to generate sufficient headroom for a long term investment in the acquisition or building of new homes. An initial investment programme of £20m HRA funding was agreed under the original Business Plan and with its success a further £20m is identified for the next five years.

As a Registered Provider with the HCA the council can bid for Affordable Housing Grant and this represents a helpful contribution to capital costs. For example, the Beckfield Lane housing development some £403k of HCA grant funding has been utilised. However, restrictions on the HCA grant funding mean that it cannot be used in conjunction with RTB receipts. These receipts need to be used within three years or returned to government and so will be prioritised ahead of any bids for HCA grant funding. To ensure that we maximise our opportunities it is proposed that we use right-to-buy receipts to buy back suitable former council homes that are offered for sale.

The announcement in October 2017 of an additional £2bn funding for affordable homes has the potential for a grant of

£80,000 per unit which is a potential opportunity depending on the final details yet to be published by the Government.

Consideration is also given to the different delivery mechanisms for new council housing to ensure value for money from the HRA investment fund. This is constantly kept under review and covers three core elements; the speed of delivery, the build costs and the design standards of the homes. Current considerations include:

- Building new homes with or without grant funding.
- Using affordable housing commuted sums to develop new homes.
- Options for innovative investment of HRA and/or commuted sums on land purchases to facilitate mixed tenure developments maximising affordable housing delivery and provide a return on capital investment made through equity stakes or commercial loans.
- Purchasing homes on the open market.
- Taking homes through planning gain on private developments.
- The potential for wider partnerships and delivery vehicles.
- Reviewing the environmental and space standards of new homes.
- Considering modular or 'off site' construction where this is more cost effective and/or offers faster delivery than traditional build.

Summary of Key Messages

The funding regime for social housing has changed radically and the HRA investment assumptions reflect this but a further £20m investment has been identified for the period to 2023.

The original £20m investment fund to 2018 has been invested or committed.

There is a high and enduring demand for the existing social housing stock and a need to increase provision of affordable housing

Regular reviews of procurement model for new build council housing will be undertaken.

Explore the opportunities provided by the partnership with the HCA and the proposed housing development company to provide more social housing in the city.

There is an impetus to explore and support new forms of delivery of affordable housing including outside of the HRA.

There are clear signals from the Government indicating a more positive approach to the role of social housing nationally.

Priorities

Consider options to continue with a programme for bringing forward the delivery of more affordable housing

Agree a policy on the use of affordable housing capital receipts received from RTB sales and commuted sums

Establish preferred methods for funding on a scheme by scheme basis

Continue to review available procurement options for the delivery of homes

Bring forward proposals on further council sites that necessitate wider re-modelling of stock/selective demolition etc. as part of the HRA Strategic Asset Plan.

Repairs and Maintenance / Stock Investment

Our Priorities

Each year a structured programme of maintenance and improvement is carried out following a review of investment priorities. Factors taken into account when setting investment programmes include:

- Priorities in the Strategic Asset Plan for housing
- Stock condition data – including dwellings that are at risk of failing under the decent homes standard.
- Components reaching the end or their useful life.
- Energy efficiency performance.
- Statutory requirements (e.g. asbestos, fire, electrical and gas regulations).
- Trends in reactive repairs.
- Redundant or obsolete stock.
- Improvements to dwellings and communal areas to ensure the actual properties as well as communal facilities are fit for modern day living and remain lettable.
- The requirements of an ageing population in York for adaptations to allow residents to remain in their homes.

A snapshot of the service shows that:

- In 2016/17 our work included

- carried out around 44,000 responsive repairs
- modernised 132 homes
- renewed 44 roofs
- replaced old boilers in 637 homes.
- The average unit cost of repairs to void properties is £1,900.
- At the end of March 2017, there were 347 dwellings considered as not meeting all the Decent Homes standards. Remedial work should commence on site in early 2018 and be completed by the end of 2017/18.
- The average energy SAP rating of our stock is 74.
- About 200 homes are affected by standing water in the sub-floor areas, which arises predominantly from the high water table that exists in parts of York. This is being remedied through our Standing Water project, due to be completed in March 2019.
- Over the next 5 years we plan to invest around £45m in improving our stock.

Strategic Asset Management

An asset management system (SAM) is used to hold information on the key components that make up any asset and to guide and influence future investment priorities. Assets consist of all property types and also include communal and external areas.

Stock condition surveys, and existing stock condition data, are used to establish the remaining life of key components. As works are completed, components are 're-lifed' within the

database to reflect the work.

A Strategic Asset Plan has been developed that not only considers maintenance costs, the remaining life of key components and structural issues, but will also cross reference these with the demand for particular types of homes and locations. This comprehensive asset plan will then inform investment decisions including whether regeneration of existing estates could bring forward redevelopment opportunities to create more sustainable housing.

Future Proofing Our Housing Stock

A Strategic Asset Plan is key to setting the investment priorities for the overall stock, but there are also internal modifications to existing homes that can future proof them for the changing profile of tenants and potentially also save the council money by alleviating some pressures on social care and adaptations funding.

Customer Service

The repairs service is regularly described by our customers as one of the most important services they receive from their landlord, carrying out over 44,000 individual repairs in 2016/17. This is the biggest customer contact function of the service and as such has potentially the largest impact on customer satisfaction. In 2016/17 86% of our customers were satisfied with the overall quality of repairs.

Service Restructure

By December 2017 we will complete a service restructure in Building Services, which has the following objectives:

- Move towards a more efficient, and sustainable, service delivery model that is able to compete commercially and consistently demonstrate value for money.
- Be able to trade more of our services and provide income for the council.
- Increase capacity and improve the way we manage service and support staff
- Reduce hourly rate, be more productive, and work in more joined-up way
- Improve customer experience, develop better IT and business information
- Align the department to support the Council Plan, HRA Business Plan and Asset Strategy
- Move to area working for supervisors to align with hub working
- Embed council values and behaviours – working together, to improve and make a difference

Procurement

We aim to improve our procurement skills and methodology, to enable us to consistently secure contracts that provide value for money, ease of management, quality for our customers and contribute to the council's values.

In 2017/18 we

- Procured 20 lots of minor works, reactive repairs, and specialist contracts. These contracts, with a combined value of approximately £800k are there to support our in-house repairs team during peak demand periods, or where specialist works are required. They also ensure that this work is consistently commissioned in a compliant and transparent way.
- Plan to procure services during autumn 2017 to carry out a programme of approximately 300 fire safety risks assessment reviews to ensure compliance with fire regulations and the safety of tenants and residents.
- Will also procure a comprehensive stock condition survey for our social housing stock in 2018.

In 2018/19 we will

- Re-procure our managed stores/materials supply contract. The existing £1.5m p.a. contract, which was jointly procured with the University of York, has been very successful, and will be seeking to replicate and improve on that success in the new contract, bringing in additional internal partners, including capital projects, in order to maximise the benefits across the council.
- Carry out a review of our existing Tenants' Choice and Standing Water contracts to ensure they continue to deliver value for money and quality for our customers.
- Re-procure our boiler replacement, our painting and pre-paint contract and our windows installation contracts.

Building Services will continue to work closely with our procurement colleagues to secure value for money and quality services for our customers. Whilst many of the contracts we will procure are likely to come through frameworks provided by procurement consortia, we will consistently aim to maximise the number of local contractors bidding for our work.

IT Infrastructure

In 2017 alongside colleagues in the wider housing service we started an ambitious project to replace a wide number of separate IT systems with one comprehensive Housing Management system. This project will for the first time allow full visibility of our service to all users of the system. Bringing asset and customer information together in one place will remove duplication as information will only need to be entered once into the system for all users to see it. This will in turn bring significant efficiencies for the whole service and the council combined with notable improvements for customers as they are provided with on-line access to their rent accounts, can book repairs and see when planned works are happening.

In addition we will see a move to mobile working for far more of our staff. These system changes will impact on our entire workforce, and will lead to very different ways of working, making this a critical project for the entire housing service.

Energy Efficiency

From our position as a landlord we continue to roll out a

phased program of improvements to our stock including the key area of making homes more energy efficient.

Our average Energy Efficiency Rating (SAP Rating) is 74 which is better than the social housing average of 70.5. This reflects investment in work carried out over the last 5 years which includes:

- Fitting 'A' rated condensing boilers as standard, with current programmes consisting of around 650 boiler replacements each year.
- Fitting thermostatic radiator valves and improved central heating controls.
- Installing air source heat pumps to 28 'off gas' properties in 2016/17.
- Installing insulation to over 1,650 lofts and cavity wall insulation to over 1,800 homes completed in 2014.
- A programme to replace single glazed to double glazed windows was completed in 2016.
- Installing low energy light fittings to communal entrances, staircases and external lighting in about 80 sites every year.
- Renewal of the communal heating systems at Gale Farm Court, Barstow House, The Glebe and Marjorie Waite Court sheltered sites.
- Renewal of night storage electric heating with modern electric heating at Alex Lyon House and Honeysuckle House – in both communal areas and dwellings.

Funding has been included within our 5 year investment programme for energy efficiency works. We are also working with Better Homes (York) to identify opportunities to increase

the energy efficiency of the housing stock as well as leveraging in external funding.

Future initiatives over the next 5 years include:

- Replacing electric night storage heating in c.250 dwellings.
- Upgrading insulation of up to 650 dwellings which have an uninsulated vertical hung tiling finish, mainly maisonettes.
- Install cavity wall insulation at the Navigation Road site to start in early 2018.
- Continue the boiler replacement programme using 'A'-rated boilers and fitting thermostatic radiator valves and improved system controls.
- Continue the programme to replace external softwood door replacements – around 500 per year.
- A programme to replace first generation UVPC windows dating from the early 1990's - intended to commence in Bell Farm and Chapelfields in 2018/19.

Health and Safety management – building maintenance

It is the policy of Building Services to adopt the management of health and safety as integral to the improvement of business performance and define, document and endorse its commitment to:

- Implementation of a safety management system based upon current work activities, the identification of hazards

and the assessment of associated risks.

- Provision of places of work and vehicles which are safe and without risk to the health and welfare of all its employees, independent contractors and the general public, so far as it is reasonably practicable.
- Providing appropriate information, instruction and programmed training and education.
- Consulting with employees to determine what measures should be taken to increase awareness of health and safety.
- Setting and publishing health and safety objectives
- Providing adequate and appropriate resources to implement this policy.
- Make regular reviews of this policy and institute improvements where possible.
- Introducing an integrated approach to health, safety and the environment.

In addition we will work more closely with our Health and Safety colleagues to review and ensure compliance with statutory and best practice requirements on key service areas such as;

- CDM (Construction Design Management)
- Asbestos Management
- Water Hygiene
- Fire Safety Management
- Electrical Safety
- Gas safety
- Vehicle safety

- Lone working
- Use of tools and machinery

Asbestos and Fire Management

Following the Grenfell Tower fire in June 2017 the council acted quickly to ensure residents were safe. We have no tower blocks (i.e. no buildings over 18m high) and none with the Aluminum Composite Material (ACM) cladding that was used at Grenfell Tower. Fire risk assessments were carried out on 592 premises with communal areas, with further checks on 309 communal areas in family homes and 13 in sheltered accommodation due to be checked by April 2018.

While not a regulatory requirement, periodic testing of electrical systems in dwellings is recognised as good practice by both reducing the risk to tenants of electrical shock but also the risk of fire as a result of old unsafe electrical systems, recognised as one of the major causes of fire. All voids are now being electrically tested and a programme to test occupied dwellings is being developed with the intention for in house electrical teams undertaking the work. This programme will include fitting smoke alarms where none are present. Complementary to this is that the Tenants Choice programme includes re-wiring of each property.

Fire Awareness training was carried out across both Housing and Building Services teams over 2015/16 and the four year Framework contract for Asbestos Surveys/Air Monitoring will be re-procured during 2018

Summary of Key Messages

We already have asset management data on the condition of our stock and we recognise that we now need to overlay this with data on the demand and turnover of homes, plus land holding to provide a fully comprehensive strategic asset plan and that the data needs to be reviewed.

We will continue to work with the tenants and leaseholders to determine the priorities for the service.

The introduction of mobile working has improved the efficiency of the service but further investment has been agreed to replace all systems across Housing and Building Services to enable integrated and efficient customer service

The housing stock overall is energy efficient, however properties that are difficult to treat and 'off gas' still require attention to ensure residents can afford to heat their homes and issues of damp and mould growth are avoided.

The service remains focused on legal compliance on health and safety including asbestos, fire and gas but needs to step up activity concerning the maintenance of electrical systems.

We need to look at ways of 'future-proofing' the housing stock in recognition of the changing demographic profile of our tenants and the likelihood of a continuation of a reduced housing stock due to RTB sales. Investment to improve facilities are part of the future investment programme carried out at the correct time

Priorities

Key programmes of work over the next five years include:

Complete Building Services restructure, allowing us to become more efficient, provide better services to customers, and trade externally

Completion of comprehensive stock condition surveys of all council housing stock

Introduction of new housing management IT system

Continue to deliver the Tenants' Choice programme of modernisation and improvement to the housing stock

Painting to the exterior of dwellings and communal areas in flats to be extended to an 8 year cycle on the basis that properties have historically been painted to very high standards. This will generate a revenue saving of c.£700k every 8th year to be used for other priorities.

Renewal of the water supply pipes to circa 2,000 dwellings, 1,500 of which are not council owned. This remains in the programme but is a project subject to risks

Eradication of major structural damp to several hundred properties across the city. Current programme has approx 200 properties awaiting these works ,with additional properties emerging

Continue the programme of adaptations to enable tenants to remain living in their home.

Resolving structural problems with the prefabricated bathroom 'pods' to 40 flats at Bell Farm. Prior to any work being carried out Housing Development will complete a

feasibility study

Maximising the funding and delivery opportunities presented by the partnership with Better Homes (York)

Focusing on further improving the experience of customers in respect of the maintenance of their homes. This includes ease of access to clear, understandable information and to the service they receive at their home.

Housing Management

The Housing Service is responsible for the management of our housing stock and for the community involvement which make our estates vibrant places to live and work. Key functions within this are the income and tenancy management of just under 7,700 homes, letting of properties, right-to-buy administration, services to around 520 leaseholders, resident involvement and management of low-level tenant anti-social behaviour.

The service also manages 245 tenancies on behalf of Thirteen Group Housing Association for which we received £131k in 2016/17 and £125k is expected in 2017/18. YorHome, the non-profit letting agency for private rental properties run by the council, manages around 40 private sector homes enabling us to match them to suitable tenants from our Housing Options service.

Table 4: Council owned homes

Category	Stock numbers 1/4/17
Total HRA stock (units) of which:	7,694
• General Housing	7,272
• Sheltered Housing	212
• Sheltered Housing with Extra Care	153
• Temp Housing (dispersed)	18
• Temp Housing (Hostels)	39

We work closely with colleagues and partners in housing

options, homelessness, Building Services, the city-wide community safety hub, housing standards/adaptations, supported housing and the Housing Development team to deliver a comprehensive, joined-up service for tenants at all stages of their tenancy.

National government initiatives and proposed policy changes present challenges and opportunities for the service. The 1% reduction in rents for the four years from April 2016 - 2020 has a significant impact on the income for the housing service although the confirmation of the return to the CPI +1% rent increase formula from 2020 restores some longer term certainty. Similarly the proposals for the sale of our high value stock could lead to the loss of hundreds of homes and rental income over time although the government has yet to firm up any implementation details. The continuation of the spare room subsidy ('bedroom tax') and the further roll out of Universal Credit to most new claimants from September 2017 will continue to place pressures on the housing management service as well as on the resources of those tenants directly affected by the measures.

The 2016 Housing and Planning Act also introduced compulsory fixed term tenancies for local authorities although the government has yet to implement this. A review of the Tenancy Agreement was completed in early 2016 and 52 week rent payments have been in place since April 2016.

These policy changes must also be placed in the wider context of demographic changes of an ageing population and also of an increasing 'residualisation' of the housing

stock whereby only those households with the greatest housing needs and who, by definition, are often those also with the highest level of support needs can be housed. Furthermore, financial pressures on support and resettlement services are leading to less assistance being available for some vulnerable tenants and a greater risk of tenancy failure requiring a different response from housing services.

Housing Management Restructure

The delivery structure of housing management activities was reviewed and new arrangements have been in place since October 2017. It is designed to reconfigure services to better meet customers' needs by focussing on the front line and actively promoting tenancy sustainment as well as meeting savings targets. It is intended to provide personal holistic management of tenancies, communities and their environs, support the council's approach to prevention and early intervention using the strengths of individuals and communities and to help them to become and remain resilient.

The most significant change is a move away from large patches (areas) each with several Estate Managers to smaller patches (with less properties to manage) with one Housing Management Officer (HMO) that provides a single point of contact for all issues for tenants in that patch.

An important aim is to enable HMOs to know their tenants better enabling them to identify issues earlier and triage them more effectively. It will also improve our ability to resolve

more issues at first point of contact. Patches now include sheltered housing schemes (which are now called 'Independent Living Communities') but will still have some dedicated staff hours on site. Patches are based around the East, West and Central areas of the city mirroring that of, and working closely in partnership with, the Local Area Coordinators.

This new approach recognises that customers of the housing service often have complex needs that are not always picked up as quickly as they could be. The emphasis will be on more contact with customers in their homes and a proactive, tailored and holistic service to them, dovetailing with and complementing council based and other services for the benefit of tenants and communities, breaking down departmental silos.

Against a backdrop of demographic and policy challenges it is critical that strong performance which minimises costs and maximises income and efficiency is maintained. A snapshot of performance data for 2016/17 includes:

- Tenancy turnover was 7.4% in 2015/16 and 5.5% in 2016/17.
- Total rent loss through voids was 0.742%.
- Rent arrears at the end of 2016/17 were £703k representing 2.19% of the rent debit. This is an increase on the 2015/16 figure of £668k (2.05%).
- Former tenant arrears for 2016/17 represented 0.88% (£283k) of the total rent debit, an improvement on the 1.04% for 2015/16.
- Some 387 council tenant households are currently

affected by the removal of the 'spare room subsidy'. This is a reduction from 523 noted in the last Business Plan and has been achieved by a combination of downsizing opportunities including funding to assist with removal and other costs, promoting mutual exchanges between tenants and introducing policies to prevent tenants being allocated or permitted to move into a home with more bedrooms than they require (unless downsizing from an even larger home). A reduction in the overall benefit caseload, that is, less people are entitled to HB, has also played a part.

- As of October 2017 30 tenants are affected by the benefits cap which shows an increase because the cap was reduced to £20,000 from November 2016.

Income Management

Consistent reduction in current tenant rent arrears over previous years has seen a reversal since 2013/14 (see Table 6), primarily the result of the cumulative impact of welfare reform.

In response to this, as well as maintaining a pro-active/early intervention approach working with key partners in housing benefit, Citizens Advice York (CAY), Foundation and York Learning, systems have also been put in place that improve the way in which rent accounts are monitored to ensure early and timely intervention if these go into arrears.

The switch to UC will present some well documented and difficult challenges for some of our residents. For example,

the need to claim on-line, the inclusion of the housing element in the single payment to the claimant, the move to a single monthly payment in arrears, a minimum six week delay in the first payment and the stricter conditionality rules will create some disruption to the ability of some tenants to manage their finances effectively. This has the potential to significantly undermine the very stable nature of the landlord income base and impact adversely on our financial stability. The experiences of other social landlords are well known.

We have procedures in place to help identify those of our tenants who are claiming UC and may require additional support to pay their rent and secure their home. The service has been closely involved in the preparations undertaken by the council and key partners to ensure that the transition to UC is as smooth as possible and that the appropriate support is available to residents. This includes close liaison with CAY and the wider advice sector, the Department for Work & Pensions (DWP), Explore Libraries and the council's benefit service.

The challenges that welfare reform bring require an increased focus on early intervention and a more holistic approach in supporting tenants with their financial management. Our staff will actively promote opportunities around digital inclusion, training and employment through advice and support in this area. They work with staff across the council and with partners to develop initiatives and raise awareness. Promoting these is an integral part of the work to enable customers to thrive and prosper in a financially challenging environment, tapping in to the considerable advantages available when accessing on line services.

To assist in making best use of stock and to help those affected by the removal of the 'spare room subsidy' the landlord service approved a downsizing incentive scheme. This includes funding to assist with removal and other costs, increased priority for tenants wishing to transfer to smaller homes, and 'swop shop' events that provide advice and assistance to tenants interested in downsizing. This can be through transfers and, increasingly through mutual exchanges.

Anti-social Behaviour

The housing management team works closely with and is supported by a specialist team of Anti-Social Behaviour Officers within the Community Safety Hub based in West Offices. They work alongside North Yorkshire Police and the Neighbourhood Enforcement Officers and a number of other partners.

There has been an increase in the complexity of cases, particularly from people suffering from mental health and dual diagnosis issues. The Community Safety Unit has a specific post that focuses on resolving these complex cases. It is also acknowledged that there is currently a shortfall in specialist and supported accommodation to meet the needs of these groups.

A review of the Hub is expected to be completed by March 2018 and a new IT system is planned to be in place later in 2018 to improve the effectiveness of the service, enhance communication within the Hub and with partners and upgrade

the case management system.

Community Development

In the last few years the housing management team has reviewed its approach to community engagement and with tenant associations, ward councillors and other stakeholders they began developing local action plans. A number of local hubs have been developed over the last year reflecting the council's ambitions to provide accessible local services. Further work is being undertaken to develop the offer that these hubs make to the community with partners and local area teams.

As part of the council's priority to develop community capacity the housing management services will review the Local Estate Action Plans (LEAP) and management of localities with residents, colleagues and ward teams. The purpose of these plans has been to identify those things that are important to residents and local stakeholders and put action plans in place to tackle the issues. It is acknowledged that these need to be more effective and work will be undertaken over the next 12 months to strengthen their development and embed them into the way we work with communities.

The Letting & Allocation of Homes

The allocation of homes is delivered via the North Yorkshire Home Choice (NYHC) sub-regional choice based lettings scheme used by York and ten other social housing providers across North Yorkshire. The system has created greater

transparency for customers but has not been successful in reducing the levels of administration.

A review of the housing registrations process was undertaken in 2015 and as a consequence we completely changed our approach to manage customer expectations more effectively. It found that only 33% of customer demand was being met. Over 30% of registered households had little or no housing need and were in (the lowest) Bronze band and only 6% of properties were let to Bronze band households each year. The system generated significant failure demand and our new way of working reflected the need for more effective management of customer demand coming into the system as well as management of that demand once within the system.

From January 2016 the Housing Registrations Team became a team of generic Advisors and all customers must now have a conversation and or an interview with an Advisor to discuss their current Housing situation and housing options available to them prior to being given access to the North Yorkshire Home Choice Register. This includes realistic information with regards to waiting times for re housing within the York. This process has seen a decrease in time it takes to process applications and a significant decrease in calls and messages requesting and update on the progress of an application giving staff time to deal efficiently and effectively with application processing. In the coming year we will review our membership of the North Yorkshire Home Choice partnership.

Customer Services

A new comprehensive training plan for 2017/18 has been created to support the new Housing Management structure that was introduced in October 2017. It reflects the new responsibilities of the more generic HMOs and a clear desire to give our people the confidence, skills and knowledge to resolve more issues at first point of contact.

We will ensure that services are delivered in the way that customers want, when they want them by ensuring that staff are supported through training, ICT support, effective management and comprehensive policies and procedures.

A thorough training needs analysis and skills audit was carried out and the plan has a clear focus on empowering our staff to make more effective decisions and improve the front line customer experience. We will give staff the tools and knowledge to carry out their roles with confidence. Our approach to customer services continues to be based on customer preference when making contact. The planned new ICT system will provide greater opportunity to enhance how we contact customers using the wide range of channels available. In the meantime we will enable and promote self-service options and communication media (for example, by early 2018 we will have our own Facebook and Twitter presence) whilst retaining and developing more traditional methods of communication for those customers who need and prefer this.

Internal procedure documentation has been overhauled to reflect the new structure and version control is now in place

to ensure consistency and reliability. More effective mobile working is supported by the provision of iPads to all HMOs and the information on our website has been reviewed and improved. We are improving how we collect and record key contact information from customers to ensure that we use it more effectively to support customers and align it with corporate systems.

We will develop a 'Customer Care' visit scheme through which all tenants will be visited by a HMO to provide better outcomes for customers and the service in terms of service provision and identifying and addressing safeguarding, support or enforcement issues by working more closely with partners such as the Local Area Teams. This will enable issues to be identified sooner and intervention support provided or signposted at an earlier opportunity.

Our training and staff development will support our ambition to make it easier for our customers and communities to do more things for themselves which is also reflected in the creation of the new position of an Active Communities Officer.

We will be bringing forward plans to utilise the apprenticeship scheme to train and retain staff and improve service delivery.

Right to Buy (RTB)

Historically RTB has been high with over 6,000 homes sold within the city since its introduction. The last three years have seen a steady increase in sales coinciding with an

increase in the maximum discount (currently £78,600) and reduced qualifying period for eligibility. In the last two years (2015/16 and 2016/17) 147 council homes (see Table 5) have been sold under the right-to-buy of which 75% were houses at a total discount of £9.48m generating receipts of £11.2m.

The Business Plan settlement model had assumed RTB sales between 20 and 28 per year but this has now been increased to 60 sales per annum reducing to 50 in the later years of the plan.

Table 5: RTB applications and sales

Year	Applications	Sales
2011/12	20	6
2012/13	88	23
2013/14	77	53
2014/15	98	52
2015/16	141	68
2016/17	123	79
2017/18 (to 30/9)	67	29

Making Best Use of Our Stock

Demand for social housing in the city is high and this means most homes can be re-let easily. Nevertheless, there are properties where remodelling/demolition will improve the quality and in some cases quantity of homes.

Within the council stock there are also one-off high value

properties and a review is undertaken in line with the Asset Strategy to determine whether we retain or sell these properties using the capital to reinvest in more suitable accommodation.

Summary of Key Messages

Welfare reform changes will impact upon the council's ability to collect rental income and could lead to increased arrears

Welfare reform will add additional pressures on household incomes and living arrangements that will affect tenants' health and wellbeing

We need to explore more ways of maximising income, tackling digital exclusion and assisting customers into employment or training

The introduction of Universal Credit means that the direct link between tenants housing related benefits and the administration of these by the council will be severed.

General needs accommodation is not always the most suitable accommodation for vulnerable groups including those with complex needs

Development of localised services is key to the effective delivery of the housing management function

Addressing overcrowding and under occupation is an essential component of making the best use of the council housing stock.

Deliver a replacement ICT system that meets the needs of residents, the housing service and the council's wider

priorities.

Priorities

Over next 18 months embed and review the new housing management structure ensuring that it delivers a more holistic serviced to households.

Continue to review, particularly in the light of Universal Credit, rent arrears policies and procedures to ensure that rent is paid and households are supported to sustain their homes.

Continue to provide support to those most likely to be affected by welfare reforms to minimise negative impacts on households.

Encourage under occupiers to take advantage of downsizing incentives to help free up larger homes

Better understand the needs of our customers through detailed customer profiling to inform the development and improvement of services

Develop targeted housing advice to meet the needs of different groups, such as younger households, older households and those with specialised needs

Keep the impact of Universal Credit under regular review

Address financial exclusion by work in partnership with high street banks and credit unions to provide basic bank accounts and encourage use of direct debit payments

Continue financial management training for tenants and staff to improve household budgeting

Explore options for developing specialised accommodation for customers with mental health

Maintain and review local advice services offering a range of advice and information

Improve the delivery of services at the local level and apply common priorities for Local Estate and Wards

Remodel or redevelop obsolete or less sustainable housing stock to maximise the supply of decent affordable homes.

Review the stock of high value homes and consider options for disposal and re-investment in new housing supply

Deliver the single training plan for the whole service focussing on a programme of empowerment and coaching ensuring that it supports the new housing management structure.

Actively engage in the delivery of the Community Safety Plan 2017 – 20.

Supported Housing

Supported housing is defined as housing which is designated for a specific group (such as older people, people with learning disabilities etc.) and in which there is some level of support provided as part of the accommodation offer usually funded through a service charge to residents.

A supported housing strategy has been developed to address the supported housing needs of the City, and to prioritise resources appropriately⁵. The strategy has an overarching vision to increase and maintain independence by ensuring the right supported housing options are available at the right time and the right place for those that need them.

The needs of seven groups were examined in the strategy:

- Older people (those aged 55 and over)
- Those with mental ill-health.
- Those with learning disabilities.
- Young people,
- Ex-offenders.
- Homeless people.
- Those at risk of substance misuse (drugs and alcohol).

The key priorities and actions identified through the strategy can be found in the action plan. Housing Services play a critical role in supporting the delivery of the Supported Housing Strategy priorities. This includes:

- Directly managing 9 Independent Living Communities, and a further 2 with extra care.
- Providing temporary accommodation for statutory homeless households, this includes Ordnance Lane (currently providing 31 units of various sizes) Holgate Road and Crombie House (20 units).

Around 30% of York's population is aged 55 or over and this is reflected in the profile of council tenants. Sheltered Housing (Independent Living Community housing) makes up 13% of social housing stock in York.

Older Person's Accommodation Strategy

York's older persons' population is growing rapidly with the number of over 75s expected to increase by 50% over the next fifteen years. The supply of accommodation with care is currently inadequate and, as the population increases, the shortfall will grow if no action is taken. In July 2015 the council's Executive approved the Older Persons' Accommodation Programme which was designed to address this problem and by 2020 can halt the increasing shortfall by increasing net provision by 682 units⁶. Good progress is being made with the Programme and confidence is held in its ability to deliver the outcomes required. However, further work will be needed in the following decade to keep pace with the growing older persons' population.

The HRA has played a key part in supporting the Programme by investing in:

⁵ York Supported Housing Strategy 2014-2019

⁶ Report to Executive 28/9/17

- Providing 24/7 care at Glen Lodge and Marjorie Waite Court Extra Care schemes.
- Building a 27 home extension to the Glen Lodge Extra Care scheme.
- Delivering an additional 33 new units of Extra Care accommodation by extending Marjorie Waite Court

Mental Health

The main priority identified through Supported Housing Strategy consultation was for supported accommodation for people with mental health issues, along with complex or multiple issues who also have other support needs due to substance misuse or offending. These individuals require intensive and targeted support for the medium term (up to 5 years) that is currently unavailable. This would help prevent re-admission to hospital, and support sustainable resettlement for those who are currently struggling to manage precarious accommodation in homeless accommodation, and unable to engage fully in resettlement work due to their mental ill health.

Housing Services are working with Tees, Esk & Wear Valley, Adult Social Care and the CCG on proposals to develop a pathway of resettlement and support for people with mental ill health.

Homelessness

The Ordnance Lane homeless hostel of 32 units of

accommodation has been in need of replacement for many years. The buildings are no longer fit for purpose from both a management and maintenance perspective. In 2014 the council approved a budget to replace the current hostel with a new build development of 39 units of accommodation. Unfortunately the developer went into liquidation but an opportunity arose to purchase and convert existing office accommodation at James House, James Street that was being converted into 60 flats. This was approved in March 2017. Completion is expected in April 2018.

It will allow us to consolidate existing provision on four sites on to one site and provide a much better service to residents from that single location. Two of the existing sites, Crombie House and Howe Hill will be converted into new council housing, while premises in Holgate Road will be sold off and the money invested into James House,

More broadly, work on developing the Homeless Strategy 2018-23 has started and will be completed in 2018 and planning for the impact of the Homelessness Reduction Act 2017 from April 2018 is underway.

Summary of Key Messages

Some temporary accommodation is not fit for purpose

There remains a need for ongoing planned maintenance of current sheltered housing schemes.

The Older Person's Accommodation Programme will deliver a net increase of suitable provision of 682 units by 2020

There is a need for more supported accommodation for people with mental health problems who have complex needs.

A replacement for the Ordnance Lane homeless hostel has been identified and secured at James House.

Priorities

Ensure that James Street opens on time and on budget and that a smooth transition of residents takes place.

Ensure the supported housing strategy is used to help plan for future developments.

Pending the outcome of the Mental Health Accommodation review we can potentially bring forward proposals for the conversion of some of the councils existing general needs stock into medium term supported accommodation for people with mental health problems to address the shortfall in provision for this client group

Ensure that the Older Person's Accommodation Programme remains on track.

Deliver effectively the requirements of the Homeless Reduction Act 2017

Adaptations

Local authority social housing providers are expected to meet the cost of any adaptation work required by tenants to their housing stock. Each year about 400-450 council homes receive some form of adaptation to meet the needs of particular households. The investment requirement ranges from minor adaptations (e.g. grab-rails and ramps), more major adaptations (e.g. stair lifts, through floor lifts and assisted bathing facilities), up to making major structural changes.

If an adapted home becomes empty we aim to match, through our choice based lettings system, these properties to tenants with appropriate needs.

Although every endeavour is made to let adapted properties to tenants who need them, this is not always possible. There is an ongoing need to relocate existing adaptations, renew existing installations and to provide additional installations to meet arising need. The Housing Capital Investment Programme of £400k p.a. supports this provision.

An additional consideration is the increased revenue cost associated with servicing and maintaining specialist equipment that is installed in the housing stock, where again the budgets allocated for this purpose come under increased pressure over time as the number of adaptations increases. There is an acknowledgement that the recording of this information and the subsequent prioritisation of re-lets to

households with similar needs could be improved. This will be a priority for the Strategic Asset Plan

The building of new homes to a lifetime standard – especially at Derwenthorpe - has provided new opportunities for disabled people, their carers and in particular for families with disabled children. Using adaptation funding these homes have been specially adapted to meet the needs of the individual disabled person, for example by the installation of a through floor lift in the designated space in the hallway of the lifetime home rather than being installed in a living room. However the design of a lifetime home also means that the disabled person also has the ability to access rooms which traditionally would not normally attract funding e.g. access to siblings' bedrooms and access to a kitchen. This benefits not only the disabled person but also their carers and families.

Summary of Key Messages

Lifetime home standards are enabling adaptations funding to be spent on homes that generally more fully meet the needs of customers

There is scope for making more effective and efficient use of adapted homes when these are available for re-letting

Priorities

We are introducing an ICT system which aims to provide appointments for customers and provide better real time information to ensure that adaptations are being installed efficiently .

Governance and Tenant Involvement

Decision making

City of York Council is a unitary authority delivering a wide range of statutory and non statutory services to local residents. Working from its democratic mandate, it plays a key leadership role in the life of the city and is responsible for a wide range of services including housing, planning, education, transport, highways, adult social services, children's services and public health. The council is made up of 47 elected representatives drawn from 21 ward areas.

The council has an executive structure for governance and decision- making. Housing Services is led by the Executive Member for Housing and Safer Neighbourhoods who delivers direct representation at meetings of the Executive and full council, coupled with regular meetings with the Assistant Director for Housing and Community Safety, and York Residents' Federation. Decisions can be made efficiently and based on personal understanding and direct involvement.

Housing Services is aware of the need to keep pace with the changing requirements of regulators, especially in regard to residents monitoring services. The role of tenants in co-regulation has been embraced by the council, with the

introduction of the Housing Service Inspectors and the Tenant Scrutiny Panel.

The Housing Environment Improvement Programme (HEIP) replaces the long standing estate improvement funding. It has been developed through consultation with the Residents Federation, customers and Officers. This new programme, funded for £170k p.a. will deliver local priorities identified through the ward team and will be co-ordinated by the HEIP Panel made up of tenants, councillors and Officers.

Tenant Involvement

Tenant involvement is critical to the delivery of an effective and efficient housing service.

Working with our customers we have developed a range of involvement activities from which customers choose how they wish to influence services from a wide range of options including:

- York Resident Federation and (currently) 14 Resident Associations.
- Tenant Scrutiny Panel.
- Service Inspectors.
- Leaseholder Scrutiny Panel.
- Leasehold Forum.
- Equality Panel.
- A range of satisfaction surveys, focus groups and drop-in sessions.

The long-standing York Residents' Federation is the umbrella group for York's Residents' Associations. With a formal structure, access to senior staff and the Executive portfolio holder as a standing member, the Federation's voice influences our policies, priorities and performance.

Residents' Associations provide a tight focus on communities and localities.

The Tenant Scrutiny Panel check and challenge policies and performance. They continue to monitor performance data and co-produce the Annual Tenant and Leaseholder report. Having reviewed the local service standards during 2011 and 2013 they are currently investigating the effectiveness of producing service standards to include targets. These standards will be more meaningful for tenants and through the monitoring process undertaken by the Panel will provide robust improvement data for Housing. They are committed to ensuring our resources are focused on achieving the improvements that really matter to tenants.

Our established group of Service Inspectors use a wide range of techniques to deliver their challenging, in-depth inspections. They look at the services Housing provides from the tenant's perspective to highlight changes that will make a difference. They continue to monitor the delivery of the lettable standard and regularly independently inspect properties before they are let. They are now inspecting the delivery of the Tenants Choice programme which includes holding focus group meetings for tenants who have had the programme delivered in their homes. They discuss their findings with Tolent Living (the contractor carrying out home

improvements on behalf of the council) and the council's contracts manager to feedback the information collected. This ensures that improvements can be made taking tenants' views into account

A bimonthly new Tenant Focus Group makes sure tenants' views continue to influence the voids process by contributing to the monitoring of the lettable standard to support continuous improvement.

The newly formed Leasehold Scrutiny Panel has been driven by the Leasehold Forum and is focussing its early work on the issues raised at that meeting. Formed in May 2016 they have already produced their first Leaseholder Newsletter (which they intend to produce biannually to inform Leaseholders of their work) and have begun looking into gardening charges. They continue to work on clarifying insurance cover for leaseholders and are committed to working with the council to improve services for all the council's leaseholders.

The twice yearly Leasehold Forum is a meeting to which all council leaseholders receive an invite and agenda. This forum gives leaseholders the opportunity to meet senior officers and raise issues directly with them.

The emerging Equality Panel is in its very early stages with the aim of challenging and supporting the direction on equality and diversity issues within housing services

Summary of Key Messages

Younger people continue to be under-represented in shaping and influencing services and appear less interested in attending traditional meetings. The next year will see additional efforts to support the development of appropriate involvement methods.

We continue to seek broader representation and involvement in decision making to ensure services remain attuned to the needs of our increasingly diverse customer base. We have written an engagement strategy supported by a four year action plan which includes working towards more representative involvement

Priorities

We will continue to promote new involvement activities and make use of social media such as Twitter and Facebook to reach a greater range of tenants and particularly target those that have not traditionally been involved to ensure services remain relevant and accessible to them. We have written an engagement strategy supported by a four year action plan to support this.

Deliver the Housing Environment Improvement Programme (HEIP).

Information Systems

Current IT Infrastructure

Housing Services employ a range of systems including commercially procured systems, web based applications and ad hoc databases.

Housing specific systems include:

- Northgate SX3 Integrated Housing Management System – (also used by Revenues and Benefits with an integrated database)
- SAM – Property Database
- Servitor Housing Repairs – Works Management System
- Anite Document Management System – Housing Services
- Abritas Choice Based Letting System
- Flare/APP (also used by Environmental Health and Trading Standards)

The Housing Service relies very heavily on a number of business critical ICT systems, with the Integrated Housing Management Information System (Northgate SX3) being one of the key applications. This system has been upgraded with the existing supplier but still requires extensive development.

IT infrastructure replacement project

A review of current systems was carried out during 2016 and a budget of £1.72m has been agreed to invest in replacing those systems in a programme that will take around two years to implement. A project team is in place and the full scope of the project is being finalised.

The overriding strategic objectives are to transform service delivery and place customers at the centre of the service. It will remove barriers to service improvement that inhibit the current systems – system architecture, lack of integration, system interface issues, availability and cost of system support, failing end of life software, data quality issues, manual processes, duplication of effort and overly complex processes.

In doing so it will:

- Provide an improved customer experience through single first point of contact resolution and empower customers through 24/7 self service and by offering a range of communication channels.
- Deliver a truly integrated solution that will reduce the number of current systems, eradicate manual systems and ‘work-arounds’, remove duplication and give a single reliable and consistent view of information and data.
- Allow much improved sharing of comprehensive stock condition and management information, supporting investment decisions.
- Offer intuitive, flexible and easy to navigate systems that support ‘straight through’ processes that reduce

human error.

- Make available enhanced functionality including workflow and task management with streamlined, simplified processes and be capable of supporting mobile working solutions.
- Reduce administration costs and overheads and increase revenue.
- Deliver excellent customer service with on-line packages to deliver staff training, provide universal access to data, records, procedures and documents as well as providing management information that will allow service delivery to be monitored for quality and outcomes.
- Support housing service customers to take advantage of the council-wide 'super connected cities' programme that takes services to customers and communities and facilitates customer participation in digital service delivery and development.
- Promote the health and well being of residents, working in partnership with other agencies to provide advice, early intervention and preventative action to help support and sustain tenancies and improve quality of life.

These benefits will feed through to customers as better informed decisions are taken and staff time is freed up to deliver front line services for customers.

Summary of Key Messages

Significant investment has been agreed to replace existing systems with a fully integrated and future proof solution that will help transform service delivery

Priorities

Ensure that the IT replacement project delivers all its strategic and operational objectives

Ensure that a value for money and 'right first time' approach is enabled in the delivery of services

Continue to utilise existing technology to make services easy to access, high quality and efficient, effectively managed and responsive to the particular needs of individuals and/or customer groups

Rent Arrears, Voids and Rent Setting

Rent Arrears and Bad Debt Provision

Rent arrears are a combination of current and former tenant debt, the latter being more difficult to pursue and recover. In recent years improved recovery and a rigorous approach has seen a significant reduction in former tenant arrears.

A pro-active approach to pursuing current tenant debt is central to keeping former tenant debt, and therefore the cost of rent written off, to a minimum.

Table 6: Rent Arrears

Financial Year End	Current Tenants	% of Gross Debit	Former Tenants	% of Gross Debit
31/3/17	£703,457	2.19%	£282,982	0.88%
31/3/16	£668,449	2.05%	£338,678	1.04%
31/3/15	£659,270	2.06%	£316,587	0.97%
31/3/14	£546,325	1.74%	£351,346	1.12%
31/3/13	£497,323	1.59%	£328,060	1.05%
31/3/12	£497,263	1.68%	£401,166	1.36%
31/3/11	£443,808	1.60%	£571,214	2.05%

31/3/10	£501,002	1.82%	£887,019	3.33%
31/3/09	£588,865	2.19%	£883,750	3.29%

The improved performance in rent collection seen up to 2012/13 has reversed in more recent years and this was not entirely unexpected given the depth and scope of welfare reduction policies.

It is imperative that the council takes positive action to minimise any increase in rent arrears, thus reducing the financial burden on the HRA that an increase in bad debt will create.

The HRA maintains a provision for bad debt, with the value of the provision reviewed annually, taking into consideration both the age and value of outstanding debt at the time. Our bad debt assumption remains at 1.5%.

A number of measures are in place to mitigate against increasing rent arrears. As part of the October 2017 restructure a small team of Rent Account Monitors has been established to manage rent accounts more closely and to make swift contact with tenants who miss a payment. HMOs will carry out any necessary visits. As noted earlier we have worked very closely with partners to prepare for the roll out of UC and our HMOs will be providing more holistic support to tenants in difficulty.

Void Levels

The level of void properties in the housing stock is relatively low compared with other areas in the country. The average

number of properties re-let in the last three years is 704, including transfers and non secure tenancies in Ordnance Lane hostel.

The value of rent lost as a direct result of void dwellings in 2016/17 was £241K, representing a void loss of 0.729%.

The number of voids unavailable for letting at year end remains low compared with other areas of the country and an assumption of 0.9% voids is currently considered appropriate.

Rent Setting

Rent restructuring was introduced in April 2002, with the key aim of converging rents across all social housing providers, whether local authority landlord or other registered provider.

Target rents are calculated using a formula, which considers both property prices and average manual earnings, both weighted for the geographical location of the housing stock. Target rents for York were higher than the levels being charged at the outset of the regime.

New proposals on rent restructuring were issued in November 2013 which ended rent convergence in 2014/15 and thereafter proposed to change annual increases to CPI plus 1% from RPI plus 0.5%. This means the majority of rents in York are not at target rent.

However, since the 2016 Housing and Planning Act all social rents are decreasing by 1% per year through to 2019/20.

Summary of Key Messages

The level of current tenant arrears has shown an increase since 2013/14

Rents will continue to reduce by 1% annually until 2019/20

The introduction of Rent Account Monitors will manage rent arrears more effectively

Priorities

Rent arrears and the impact of welfare changes will continue to be closely monitored

Performance Monitoring

Performance Management Framework

Housing's key actions and outcomes are contained within the overarching Service Plan for Housing and Community Safety. The actions and outcomes have been aligned to show how the Housing Service contributes to the priorities set out in the Council Plan.

The actions and outcomes have been identified to address challenges the service faces from government and legislative changes, local priorities, budget and staffing considerations and to strengthen areas of weak performance. Customer expectations are an essential source in driving improvement.

Customer influence is channelled through a number of sources including the annual Tenant Satisfaction survey, service specific customer satisfaction surveys, complaints, findings from Tenant Inspector reviews and feedback from the Resident Panel, Housing Tenant Scrutiny Panel, Resident Associations, Customer Panels and Focus groups.

The Housing Service has an annual Service Plan which is regularly reviewed and links to local, departmental and council priorities.

Weekly and monthly operational reports are provided to Housing Managers to monitor performance concerning particular service areas and comprehensive performance information is available in real time via the Council's Key Performance Indicator (KPI) system.

Performance updates are presented to the Resident Federation and the Housing Tenant Scrutiny Panel. Service Managers attend these meetings to discuss performance concerns with residents. Performance issues are also discussed by Housing Management Officers attending Resident Association Meetings on request.

Benchmarking

The Housing Service has been a member of Housemark benchmarking club since 2009. This allows robust, comparable spend data and performance analysis in relation to a range of landlord activities covering

- Overheads
- Responsive Repairs and Void works
- Major Works and Cyclical Maintenance including Gas Servicing
- Value for money
- Housing Management
- Lettings
- Rent Arrears and Collection
- Anti-social Behaviour
- Resident Involvement

Value for Money

The key findings from the analysis are plotted on the Value for Money Matrix and inform service plan priorities and Housing's Value for Money approach. A full benchmarking report is presented to Housing Senior Management team and the Housing Tenant Scrutiny Panel also oversees benchmarking results.

Community Impact Assessments

Community Impact Assessments are carried out in respect of individual service area delivery and policy review. Self-financing is a change in a major financially driven process and therefore it is not appropriate to undertake a CIA in respect of the introduction of the Business Plan in its own right. However, CIAs will be carried out in respect of any potential changes in policy or service delivery that may result from this different financial process.

Reviewing the Business Plan

The Business Plan is a dynamic, working document. Consequently it is essential that it is reviewed and updated on an annual basis. It is monitored throughout the year by officers, Housing Management Team, the Housing Portfolio Holder and the Executive, as appropriate.

Summary of Key Messages

Performance monitoring and value for money are key considerations

We are committed to benchmarking our services to ensure we have external challenge on performance levels

We will continue to involve residents in monitoring performance and shaping services

Priorities

Developing performance tools that are meaningful and accessible to the whole workforce.

Utilising the results of benchmarking, tenant satisfaction survey and customer feedback including complaints to improve services

Working to achieve top quartile performance in all areas whilst ensuring services take account of the needs of individual customers and communities

Treasury Management

The HRA Self Financing reform detailed in the Government White Paper in November 2012 resulted in the council paying £121.55m to the Treasury. This removed the Council from the HRA subsidy system from 1 April 2012 and the payment made on 28 March 2012 was effectively the debt which relates directly to the HRA.

The self-financing valuation of the local authority's council housing stock was made by the Government using a discounted cash flow model for the authority's social housing. The model was based on assumptions made by Government about rental income and expenditure required to maintain the council's housing stock over 30 years. It determined the amount paid to the Government of £121.55m and also the upper limit on housing debt that the Council may hold under the HRA self-financing reform.

In order to finance the £121.55m, significant exploration of the funding options available to the Council were undertaken with the final decision being made by the Director of Customer Business & Support Services in accordance with the delegated powers as approved by Council in the Treasury Management Strategy dated 23 February 2012.

Loan Portfolio

The objective of creating the HRA loan portfolio was to keep interest rates to a minimum, mitigate risk as much as possible and create flexibility within the portfolio.

In considering the risks associated with the proposed borrowing strategy, a key factor was the implications of repaying the initial loans at a point earlier than their natural maturity. This may be required for treasury management purposes or to provide greater flexibility within the Business Plan for future developments.

The prudent approach to scheduling multiple loans was to ensure that the HRA Business Plan was capable of repaying debt at the point where loans were scheduled to mature and could seek opportunities to further invest in the level and quality of social housing.

Based on the Public Works Loan Board's interest rate, information at the time the loans were taken on 28 March 2012, rates did not significantly vary for maturity loans for periods of 25 years to 50 years. Given this, the portfolio of 21 maturity loans was constructed taking loans with varying amounts, at a variety of interest rates, across different maturity periods in line with the HRA Business Plan.