Appendix D of Executive Report: HRA Risk Register

The financial elements of the business plan do however carry a number of risks which we must consider and try to mitigate, detailed below:

Risk	Detail
Inflation (economic uncertainty)	Inflation is of key consideration impacting on HRA rent modelling. The business plan would need to be reviewed accordingly if this were to rise. Inflation is also a key factor when investing in both our existing housing stock and in new supply, impacting on construction costs. As these costs continue to rise with inflation, rental income has conversely been constrained by the four years of rent reductions introduced by the Welfare Reform and Work Act; compounding the difficulties faced by Local Authorities when trying to invest.
Interest Rates	The council decided to take on fixed-rate borrowing from PWLB for its self-financing loans and therefore mitigate the risk of exposure to increasing interest rates as the economy potentially starts to recover. Should we borrow more in the future, the risk of higher rates for new borrowing remains.
Brexit	Uncertainty around Brexit makes it difficult to predict impact on the HRA. However, construction costs and the labour force are likely to be impacted. Ultimately, the risk is that the Council fails to prepare appropriately for the impact of Brexit on the delivery of Council services.
Rents and Welfare Reform	Council rents are modelled using Social Rent policy and 2019/20 will see the fourth and final year of annual 1% rent reductions. This action was intended to help protect taxpayers from the rising costs of subsidising rents through Housing Benefit, and protect tenants from rising housing costs. In October 2017, the Government announced its intention to set a long-term rent deal for both Local Authority landlords and Housing Associations. This would permit annual rent increases on both Social and Affordable Rent properties of up to CPI +1% (at September of the previous year) for a period of at least 5 years. This policy recognises the need for a stable financial environment to support the delivery of new homes and will come into effect from 1 April 2020. Although this rent increase has evident benefits, this should be balanced with the potential for lower rent collection rates. This is because welfare reform, unemployment, inflation and other economic factors all affect our tenants' ability to afford higher rents. As rent collection forms the overwhelming majority of income

	received for the HRA, it is vital it is both collected at maximum capacity and used effectively. The introduction of Universal Credit also means that an increased proportion of tenants personally receive their housing costs, increasing the risk of rent arrears/late payments. More generally, an uncertain economic climate can also prevent private sector investment in jobs and negatively impact on additional housing supply, leading to increased pressure on affordable housing.
Assets	The viability of the HRA Business Plan, when originally developed, was based on total stock numbers reducing with then-current forecasts of Right to Buys losses. However, this new plan must consider the impact of Government policy to reinvigorate the scheme (with maximum discounts increasing and qualifying years reducing). New projections must therefore be incorporated into our financial forecast, noting that in the last five years (2013-2018), the Council has seen 100 of its properties bought and lost via Right to Buy, peaking in 2014/15 with 25. Increased asset disposal evidently results in reduced rental income, but also reduces maintenance liabilities and affects the repayment of associated debt. The Council therefore has taken on a range of loans over a mix of maturity dates, to allow flexibility for repayment, and this risk has been built into the business plan. The risk of asset disposal from Right to Buy is also alleviated in our new build properties by the ‘cost floor’ ruling, which could potentially reduce or remove entirely a tenant’s Right to Buy discount. This rule applies if a property has been recently purchased or built by the Local Authority, or costs have been incurred by the Council on repairing or maintaining the property. The ‘cost floor’ period is either: • The 10 year period prior to receipt of the Right to Buy application form: or • 15 years if the property was built or acquired by the landlord after 2nd April 2012. Essentially, the ‘cost floor’ rule prevents the Council from having to sell their property for less than the costs incurred in building or repairing/improving it, during the previous 15 year period. The costs that can be included within this calculation are set out in The Housing (Right to Buy) (Cost Floor) (England) Determination 1999. Whilst this may deter tenants from buying Council homes at the earliest

	opportunity, it more importantly ensures that the loss on the sale of these properties is reduced. Whilst the protection afforded to the Council by the ‘cost floor’ rule should not be discounted, it should however be noted that any new build property bought under Right to Buy before it has achieved 100% payback will have a detrimental impact on the long term business model, in terms of lost assets and rental income. Conversely, when Council properties currently being built surpass their payback (are older than 30 years), they will have no outstanding borrowing against them and will therefore bring a greater net income to the HRA.