

ITEM No ...2.....

REPORT TO: POLICY & RESOURCES COMMITTEE – 24 JANUARY 2022

REPORT ON: HOUSING (HRA) REVENUE BUDGET 2022-25 AND REVIEW OF RENTS AND OTHER HOUSING CHARGES FOR 2022/23

REPORT BY: EXECUTIVE DIRECTOR OF NEIGHBOURHOOD SERVICES

REPORT NO: 36-2022

1 PURPOSE OF REPORT

- 1.1 The purpose of this report is to advise members of the outcome of the rent consultation exercise in order for them to approve the Housing (HRA) Revenue Budget and rent and other housing charges for financial year 2022/23.

2 RECOMMENDATIONS

2.1 It is recommended that the Committee:

- (i) note the outcome of the rent consultation exercise detailed in section 8 and Appendix 4 to this report and that the proposed rent increase below (iv) is in line with the majority view expressed by tenants through this exercise;
- (ii) approve the Housing (HRA) Revenue Budget for 2022/23 as detailed in Appendix 1 to this report ;
- (iii) note the Provisional Revenue Budgets for 2023/24 and 2024/25 detailed in Appendix 1 to this report;
- (iv) approve rents be increased by 1.50% equal to an average increase of £1.19 per week and subject to a maximum increase of £1.50 with effect from 5 April 2022;
- (v) approve that all other housing charges are set as outlined in Appendix 2 to this report with effect from 5 April 2022;
- (vi) agree that the level of rents held on the Housing (HRA) be similarly applied to miscellaneous houses i.e. the properties which are leased to the Richmond Fellowship, Dundee Health & Social Care Partnership and City Development, subject to categorisation where appropriate.

3 FINANCIAL IMPLICATIONS

- 3.1 Approval of the proposed review of rents and other housing charges detailed in Appendix 2 would generate additional income of £770,000 and will result in the Housing (HRA) Revenue Budget being self-balancing for financial year 2022/23.
- 3.2 Please note that the attached budget included an allowance for public sector pay increases of 2% for 2022/23. We had also assumed a 2% pay increase for 2021/22. Following recent post-consultation announcements, we now know that backdated pay increases for 2021/22 applicable to the HRA will be 3.1%. Our current revised estimate for public sector pay increases for 2022/23 applicable to the HRA is around 2.9%. Given that the consultation has concluded, this means that additional pay increases of an estimated £160k will need to be absorbed within the budget hereby presented. We will monitor the effect of this and any ongoing budgetary shortfall will be addressed through future budget setting processes.

4 BACKGROUND

- 4.1 Over recent months the Executive Director of Neighbourhood Services and Executive Director of Corporate Services, have reviewed the Provisional Revenue Budget for the Housing (HRA) in financial year 2022/23 and the outcome of this was considered by elected members last

October (Article II of the minute of the meeting of Neighbourhood Services Committee on 25 October 2021, Report No: 277-2021 refers). The total expenditure requirement for 2022/23 amounts to £56.521m and is further detailed in Appendix 1 to this report.

- 4.2 The Provisional Revenue Budget for 2022/23 has also been updated to reflect any required cost pressures and savings that have been identified through the 2021/22 revenue monitoring process to date. In addition, any new cost pressures that are expected to emerge in 2022/23 are included along with any additional investment that is being made to the budget.
- 4.3 The Provisional Revenue Budget for 2022/23 includes an estimated allowance of 2% for a pay award for all staff. Allowance has also been made for other specific and general price inflation, where appropriate. The key overall variances include the following:

Staff Costs (Increase of £19,000)

Reflects assumed pay award and increments payable together with increases in employer's national insurance contribution rates recently announced by the UK government partially offset by savings elsewhere in the budget.

Property Costs (Increase of £524,000)

Mainly reflects the increased inflationary cost in providing the extensive responsive repairs and relets service and open space maintenance, these costs relate partly to labour and can therefore fluctuate in line with assumed pay increases and other inflationary pressures. This also reflects an increase in void properties which has been adversely affected by Covid-19 and current market pressures which have led to longer void periods and additional provision to meet rising prices in energy costs.

Supplies & Services (Increase of £208,000)

Mainly reflects the purchase of IT software within Rent Recovery – Rentsense. Also reflects the increased internal recharges for the Housing HRA share of the cost of various services including Anti-Social Behaviour Team and Safety & Alarm Response Centre have increased reflecting the increased inflationary cost of providing these services.

Support Services (Increase of £69,000)

Increase mainly reflects the assumed level of inflation, this recharge mainly relates to staffing and therefore also fluctuate in line with assumed pay inflation.

Capital Financing Costs (Decrease of £61,000)

The overall capital financing costs included have increased to support the delivery of the latest approved Housing HRA Capital Plan 2021-26, that provides for gross investment of more than £120m over this five-year period (Item VIII of Agenda for the meeting of Policy & Resources Committee on 22 February 2021, Report No: 55-2021 refers).

These borrowing costs will continue to support the delivery of key housing investment priorities included in this plan such as maintaining Council houses at Scottish Housing Quality Standard, progressing towards meeting the Energy Efficiency Standards in Social Housing and the continuation of the Council's new build council housing programme.

- 4.4 The Provisional Housing (HRA) Revenue Budget 2022/23 detailed in Appendix 1 makes a number of assumptions relating to other housing charges for financial year 2022/23. These charges include a proposal to freeze the current sheltered warden service charge. The cost of the sheltered warden service is fully recovered by the service charge and almost three quarters of the expenditure for the service relates to staff costs. Whilst this element of the budget will require to be adjusted to reflect the assumed pay award, it is envisaged that through other efficiencies the overall service can continue to breakeven without having to increase the charge payable be service users.
- 4.5 In addition, these charges propose an increase for car parking in garage / lock ups and garage sites by 5% to recover the cost of maintaining these properties. Details of all these charges are included in Appendix 2.

- 4.6 Dundee City Council has in the past aimed to keep option 1 within (or as close possible to) the current rate of inflation plus 1%. This is calculated using a 'basket of indices' comprising a weighted proportion of the consumer prices index, producer prices index and local government pay awards then adding 1%. Based on the latest information available, this rate of inflation plus 1% has been calculated as 4.20%. Through prudent planning, we have sought to ameliorate the effect of inflation on HRA rent charges, and had proposed rent increase options of 1.5%, 1.75% and 2.00% for consultation.
- 4.7 When determining standard rents to which the Housing Revenue Account relates, a local authority should not consider the personal circumstances of tenants. Under the relevant Housing legislation rents can be fixed at a level which creates a surplus on the Housing Revenue Account and this surplus can be transferred to the General Fund. If any surplus accrues it will be retained for Housing Revenue Account purposes. There is no statutory limit on the amount by which council house rents can be increased although, under the Prudential Code, Councils must demonstrate that any borrowing costs included within their Revenue Budget are affordable, prudent and sustainable. This is evidenced through the preparation of prudential indicators that were included in the report on the Annual Treasury Management Activity 2020/21, (Article XIII of the minute of the meeting of Policy & Resources Committee on 25 October 2021, Report No: 266-2021 refers).
- 4.8 The report previously considered by Neighbourhood Services Committee in October outlined the following rent increase consultation options for 2022/23. Further detail of these options including the specific impact on service delivery are detailed in Appendix 3.

Option	Increase (%)	Average Weekly Increase	Maximum Weekly Increase
1	1.50	£1.19	£1.50
2	1.75	£1.39	£1.75
3	2.00	£1.59	£2.00

- 4.9 Rents in Dundee are fixed in relation to percentages of the Gross Annual Values (GAV). The GAV is intended to reflect the rent which the house might be expected to attract on the open market in ideal circumstances where there is neither a glut nor a shortage of accommodation. In these circumstances, the GAV can be assumed to have taken account of the size, type and age of the house, the area of location and amenity value. This basis has been accepted as reasonably fair and rents calculated and applied in this way maintain, generally, the proper differentials and spread the burden of increased costs over the tenants in relation to the independently assessed value of the accommodation and amenity enjoyed by them.
- 4.10 The Scottish Housing Regulator's (SHR) 2018/19 Landlord Report for Dundee City Council showed that average weekly rent levels across the council's housing was 6% lower than the Scottish average. The above proposals demonstrate the Council's continued commitment to the Fairness Agenda and seek to minimise any rent increases.
- 4.11 In preparing the above statements, the Executive Director of Neighbourhood Services has taken into account the key strategic, operational and financial risks facing the Council over the period. The main factors considered were:
- the possibility of new cost pressures or responsibilities emerging during the course of the financial year;
 - the inherent uncertainty surrounding matters such interest rates and price inflation;
 - the impact of the Prudential Code for Capital Finance;
 - the on-going impact of Welfare Reforms;
 - continuing impact of Covid-19 and particular any impact on tenants' ability to pay their rent.

By way of exemplification, the following table shows the potential financial impact of any variations against the current key budget assumptions:

Budget Area	Current Assumption	Example Variation	Financial Impact
Pay Awards	2.0%	+0.5%	£30k
Price Inflation	Various	+0.5%	£150k
Interest Rate (CLF Average Rate)	3.5%	+0.5%	£35k

5 CLIMATE CHANGE

- 5.1 Dundee City Council declared a climate emergency in June 2019, followed by the launch of Dundee's Climate Action Plan in support of the transition to a net-zero and climate resilient future. With this declaration and action plan, the Council will develop further projects and initiatives in the coming years to assist in tackling this issue.
- 5.2 The Council is committed to implementing measures that improve the carbon footprint of the city and the spending proposals within this budget will provide significant resources for tackling climate change. Housing projects that are already underway and are being considered as part of the longer-term capital plan include the following:
- continued investment in external wall insulation for existing stock;
 - other energy saving programmes such as loft insulation and cavity wall insulation;
 - further energy saving measures included within the design of new council housing;
 - installation of motion censored LED lighting within communal areas;
 - other energy efficiency initiatives including installation of solar panels;
 - linkages into new district heating schemes as these come on line;
 - piloting emerging carbon reduction technologies as they become available.

6 COVID-19 RECOVERY PLAN

- 6.1 The proposed resources will also support the delivery of the agreed Covid-19 Recovery Plan (Article XIV of the minute of the meeting of Policy & Resources Committee on 24 August 2020, Report No: 185-2020 refers). In particular, the significant investment in construction activities will provide valuable resources to recommence construction and repairs programmes across the city with economic benefits for our in-house Construction Services Division, other external companies and the wider supply chain for these activities.

7 WELFARE REFORM

- 7.1 Discretionary Housing Payments are fully devolved to the Scottish Government. The under-occupancy charge continues to be fully mitigated by the funding provided by the Scottish Government which is included within the General Fund Revenue Budget. In addition, Universal Credit Full Service continues to be rolled out, it is expected full migration of cases from Housing Benefit to Universal Credit will not be complete until September 2024 at the earliest. Universal Credit continues to have an impact on the level of tenant rent arrears, this is monitored on an ongoing basis and support provided to tenants where appropriate. The Benefit Cap continues to restrict the level of benefit households can receive, the Council's Benefit Delivery and Advice Services Team continue to identify and work with tenants affected by the benefit cap.
- 7.2 The purpose of the Hardship Fund is to assist Council tenants suffering financial hardship in the payment of rent as a result of these Welfare Reforms. In addition, it is likely that Covid-19 will have a further impact on tenants' financial circumstances. In order to continue to mitigate the impact of these reforms on council tenants, the provision for the Hardship Fund will remain at £500,000 for the financial year 2022/23.

8 RENT CONSULTATION

- 8.1 Under the terms of Section 25(4) of the Housing (Scotland) Act 2001, tenants must be consulted on any proposed increase in rents or other service charges, and the likely effect on the tenant and regard must be given to the representations made.

- 8.2 The 2022/23 rent consultation exercise was approved in October (Article II of the minute of the meeting of Neighbourhood Services Committee on 25 October 2021, Report No: 277-2021 refers). Further details including the results and various responses from Registered Tenants' Associations are included in Appendix 4 to this report.

9 **CONCLUSION**

- 9.1 The proposed rent increase will ensure sufficient financial resources are in place to meet the key housing priorities included in the Council Plan 2017-2022 (Article II of the minute of the meeting of the Policy & Resources Committee on 11 December 2017, Report 420-2017 refers). In addition, this increase will contribute towards the delivery of the overall significant capital investment programme that is planned over the next 5-year period.

10 **POLICY IMPLICATIONS**

- 10.1 This Report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment, Anti-Poverty, Equality Impact Assessment and Risk Management. There are no major issues.

11 **CONSULTATIONS**

- 11.1 The Council Management Team were consulted in the preparation of this report and agree with the content.

12 **BACKGROUND PAPERS**

- 12.1 None.

ELAINE ZWIRLEIN
EXECUTIVE DIRECTOR OF NEIGHBOURHOOD SERVICES

5 January 2022

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HOUSING REVENUE ACCOUNT

PROVISIONAL REVENUE BUDGET 2022-2025

	Final Revenue Budget 2021/2022 £000	Provisional Revenue Budget 2022/2023 £000	Provisional Revenue Budget 2023/2024 £000	Provisional Revenue Budget 2024/2025 £000
<u>EXPENDITURE</u>				
STAFF COSTS				
Salaries and Wages (including NI and Supn):	5,844	5,863	5,981	6,101
Supplementary Superannuation Charges	<u>200</u>	<u>200</u>	<u>204</u>	<u>208</u>
TOTAL STAFF COSTS	<u>6,044</u>	<u>6,063</u>	<u>6,185</u>	<u>6,309</u>
PROPERTY COSTS				
Rents	168	168	168	168
Non-Domestic Rates	197	205	209	213
Property Insurance	560	560	560	560
Repairs and Maintenance	12,023	12,149	12,392	12,639
Health and Safety Contracts	150	150	150	150
Energy Costs	541	608	619	630
Fixtures and Fittings	25	25	25	25
Cleaning Costs	24	24	24	24
Lost Rents and Bad Debts	2,023	2,235	2,280	2,326
Open Space and Garden Maintenance	<u>2,208</u>	<u>2,319</u>	<u>2,365</u>	<u>2,413</u>
TOTAL PROPERTY COSTS	<u>17,919</u>	<u>18,443</u>	<u>18,792</u>	<u>19,148</u>
SUPPLIES & SERVICES				
Liabilities Insurance	558	558	558	558
Clothing, Uniforms and Laundry	4	4	4	4
Printing, Stationery and General Office Expenses	103	103	103	103
Professional Fees	90	90	90	90
Postages	40	40	40	40
Telephones	49	49	49	49
IT Software Maintenance	98	98	98	98
Hardship Fund	500	500	500	500
Internal Recharges	2,703	2,782	2,829	2,877
Other Supplies and Services	<u>447</u>	<u>576</u>	<u>554</u>	<u>453</u>
TOTAL SUPPLIES & SERVICES	<u>4,592</u>	<u>4,800</u>	<u>4,825</u>	<u>4,772</u>
TRANSPORT COSTS				
Repairs and Maintenance and Other Running Costs	7	7	7	7
Transport Insurance	2	2	2	2
Car Allowances	<u>39</u>	<u>39</u>	<u>39</u>	<u>39</u>
TOTAL TRANSPORT COSTS	<u>48</u>	<u>48</u>	<u>48</u>	<u>48</u>
THIRD PARTY PAYMENTS				
Voluntary Organisations	<u>34</u>	<u>34</u>	<u>34</u>	<u>34</u>
TOTAL THIRD PARTY PAYMENTS	<u>34</u>	<u>34</u>	<u>34</u>	<u>34</u>
SUPPORT SERVICES				
Recharge from Central Support Departments	<u>3,458</u>	<u>3,527</u>	<u>3,597</u>	<u>3,669</u>
TOTAL SUPPORT SERVICES	<u>3,458</u>	<u>3,527</u>	<u>3,597</u>	<u>3,669</u>

HOUSING REVENUE ACCOUNT

PROVISIONAL REVENUE BUDGET 2022-2025

	Final Revenue Budget 2021/2022 £000	Provisional Revenue Budget 2022/2023 £000	Provisional Revenue Budget 2023/2024 £000	Provisional Revenue Budget 2024/2025 £000
CAPITAL FINANCING COSTS	<u>19,329</u>	<u>19,268</u>	<u>19,472</u>	<u>19,743</u>
PLANNED MAINTENANCE	<u>4,338</u>	<u>4,338</u>	<u>4,338</u>	<u>4,338</u>
<u>TOTAL GROSS EXPENDITURE</u>	<u>55,762</u>	<u>56,521</u>	<u>57,291</u>	<u>58,061</u>
<u>INCOME</u>				
Internal Recharge to Other Housing (Non-HRA)	62	62	62	62
Rents, Other Fees & Charges	52,777	52,802	52,802	52,802
Interest	60	60	60	60
Sheltered Housing Service Charge	2,582	2,589	2,589	2,589
Other Income	<u>281</u>	<u>238</u>	<u>238</u>	<u>238</u>
<u>TOTAL INCOME</u>	<u>55,762</u>	<u>55,751</u>	<u>55,751</u>	<u>55,751</u>
<u>TOTAL NET EXPENDITURE</u>	<u>-</u>	<u>770</u>	<u>1,540</u>	<u>2,310</u>

REVENUE BUDGET 2022/2023**REVIEW OF CHARGES**

Services for which charges are / could be levied	Present Charge £	Proposed Charge £
Sheltered Housing Accommodation		
Service charge	28.58	28.58
<u>Heating charges</u>		
Brington Place	6.46	6.46
Baluniefield	7.11	7.11
Car Parking ⁽²⁾		
Garages / lock ups	9.50	10.00
Garage sites	2.75	2.85
Other Housing Charges		
<u>Multi-storey laundrette</u>		
Auto wash (per use)	1.90	1.90
Tumble dryer (per use)	1.10	1.10
Cabinet dryer (per use)	1.10	1.10
<u>Communal Stair Cleaning</u>	1.79	1.88
Other Housing (Non-HRA Budget)		
Travelling People Site - Rent Charge	68.87	69.90
Temporary Accommodation Properties		
Lily Walker Centre		
Supported Complex – Honeygreen Road ⁽³⁾	187.90	187.90
	217.90	217.90
<u>Network Flats⁽³⁾</u>		
1 Apartment		
2 Apartment	82.45	82.45
3 Apartment	207.05	207.05
4 Apartment	308.20	308.20
5 Apartment	417.85	417.85
	526.00	526.00

Notes

(1) Unless stated otherwise, all above charges are on a 52-week basis.

(2) Legislation requires that income derived from these facilities be sufficient to meet the necessary expenditure incurred in providing them.

(3) The above figures reflect service charges only and exclude rental charges.

REVENUE BUDGET 2022/2023

RENT CONSULTATION OPTIONS

The following table provides details of each option available for tenants to indicate their preference on. For each option includes the details of the impact on service delivery of selecting this option.

<p>Option 1 – Rent Increase 1.50% (or average weekly increase of £1.19)</p> <p>This option would allow for the additional adjustments outlined in paragraphs 5.1 to 5.5 of this report and provides sufficient resources to allow for the current level of service to be maintained and to continue to deliver on key service priorities.</p> <p>This level of service includes the provision of the existing housing repairs service, external cyclical maintenance together with funding to deliver key housing priorities including:</p> <ul style="list-style-type: none"> - tenancy sustainment - reducing the level of households in fuel poverty - ongoing investment in existing stock and creation of new affordable housing - continued investment in environmental improvements programme
<p>Option 2 – Rent Increase 1.75% (or average weekly increase of £1.39)</p> <p>This option would also provide resources for the level of service outlined in Option 1 above.</p> <p>In addition, the higher increase would provide additional income of £128,000 in financial year 2022/23 that would allow be invested in additional borrowing. This borrowing would provide extra capital expenditure of approximately £2.3m which would be targeted specifically to progress towards meeting the Energy Efficiency Standard in Social Housing (ESSH) on all council houses. An example of what this investment can typically provide would be resources to provide external wall insulation for 340 houses or installation of solar panels for 275 houses.</p> <p>As well as the continuation external wall and other insulation programmes these additional resources could be spent on a range of other energy efficiency initiatives including solar panels, linkages into new district heating schemes as these come on line and piloting emerging technologies for our houses to meet the new requirements of ESSH2.</p> <p>It should be emphasised that the above expenditure would be over and above that included in the latest Housing HRA Capital Plan 2021-26. The Council is already investing significant resources to meet these requirements and the above plan includes over £42m for this purpose. The agreement of option 2 would simply increase these resources and give an opportunity for these improvements to be delivered within a shorter timeframe.</p>
<p>Option 3 – Rent Increase 2.00% (or average weekly increase of £1.59)</p> <p>This option would also provide resources for the level of service outlined in Option 1 above.</p> <p>In addition, the higher increase would provide additional income of £256,000 in financial year 2022/23 that would allow be invested in additional borrowing. This borrowing would provide extra capital expenditure of approximately £4.6m which would be targeted specifically to progress towards meeting the Energy Efficiency Standard in Social Housing (ESSH) on all council houses. An example of what this investment can typically provide would be resources to provide external wall insulation for 680 houses or installation of solar panels for 550 houses.</p> <p>As well as the continuation external wall and other insulation programmes these additional resources could be spent on a range of other energy efficiency initiatives including solar panels, linkages into new district heating schemes as these come on line and piloting emerging technologies for our houses to meet the new requirements of ESSH2.</p> <p>It should be emphasised that the above expenditure would be over and above that included in the latest Housing HRA Capital Plan 2021-26. The Council is already investing significant resources to meet these requirements and the above plan includes over £42m for this purpose. The agreement of option 3 would simply increase these resources and give an opportunity for these improvements to be delivered within a shorter timeframe.</p>

CONSULTATION PROCESS

As part of the wider tenant engagement strategy, officers normally hold a seminar during the summer to provide tenants information about what their rent pays for and raise awareness of how rent levels are set. The event also provides an opportunity for tenants to learn what the Council's housing priorities are but importantly also gave tenants the opportunity to let the Council know what is important to them. The information from this event helps inform the rent consultation.

Due to the restrictions imposed following the Covid-19 outbreak this event did not take place this year we have been unable to conduct such an exercise, however we have taken previous years priorities together with those we are aware of from other feedback are reflected in the options outlined in Appendix 3.

As noted above, whilst due to Covid-19, some of the traditional methods of undertaking the rent consultation were not available this year. Notwithstanding this, the Council remained committed to further consult with tenants on the budget proposals, rent levels and other housing charges through whatever means were possible, these included:

- use of telephone surveying, either directly or when tenants contact the council;
- information displayed on Dundee City Council website;
- targeted use of relevant social media platforms;
- information was displayed in any in offices that were open to public and in communal areas of other buildings e.g. multi storey developments (MSD);
- postcards were also delivered to tenants in MSD properties and ballot boxes provided for them to participate in the consultation;
- leaflets were given to tenants at housing interviews, by post and by council tradesmen that were carrying out repairs in their homes with details on how to get involved;
- publication of updated guidance (HRA Methodology) for tenants to understand what their rent pays for;
- through continued collaboration with Dundee Federation of Tenants Association (DFTA) and registered tenants' organisations (RTOs).

The consultation ran from 29 October 2021 to 23 December 2021. The rent consultation information outlined the three options for the rent increase and provided details of the level of service offered for each of the choices. The total number of tenants who participated in the process this year was 2171. This equates to returns for 17% of the current housing stock and represents stability in participation rate given last year was also 17%. This is considered really positive taking into account the specific challenges over the last couple of years. The continued high participation rate reflects the effective teamwork across Neighbourhood Services, other council service areas and from both the DFTA and other RTOs.

The Chair of the DFTA contacted all RTOs encouraging their participation in this exercise. In addition, RTOs were also invited to formally submit their preference on the proposed options. Whilst as a result of Covid-19 not all these organisations are meeting regularly at this time, a number of specific responses were provided and are included below, other RTOs that responded indicated their support of the recommended option in paragraph 2.1 (iv).

The full results of the consultation can be summarised as follows:

Option	Increase (%)	Average Weekly Increase	Number of Tenants	% of Tenants
1	1.50	£1.19	1312	60%
2	1.75	£1.39	489	23%
3	2.00	£1.59	370	17%
Totals			2171	100%

Responses for Dundee City Council Annual Rent Consultation

“The DFTA supports the lowest option -1.5% in respect of a rent increase for 2022/23. We feel this is the most affordable option for our tenants. We contacted over 250 tenants directly about this matter and this was their preferred option”

Dundee Federation of Tenants Association (DFTA) Executive Committee, 23 December 2021

“As we are still having to live with the Covid 19 restrictions and we are still unable to hold our association meeting within the complex, or hold our open meeting regarding the rent consultation for this year. Due to the cost of our Gas and Electric being increased, and the Council Tax going to be put up as well.

Therefore, the consensus of the elected committee and some of our members we were able to contact, we have agreed that we would like to go for the 1.5% increase (option one) for the year 2022/23, This will give us the same service as this year.”

Forthill Tenants Association, 7 December 2021