

Report for: Cabinet 17th October 2023

Title: Update on the Council's Housing Delivery Programme

Report authorised by: David Joyce, Director of Placemaking and Housing

Lead Officer: Robbie Erbmann, Assistant Director of Housing
(robbie.erbmann@haringey.gov.uk)

Ward(s) affected: All

**Report for Key/
Non-Key Decision:** Key Decision

1. Describe the issue under consideration.

1.1 This report gives members a detailed overview of the Council's progress towards the Corporate Delivery Plan target to deliver 3,000 Council homes for Council rent by 2031. It focuses on the progress since Cabinet were last updated on the programme and requests a number of decisions.

2. Cabinet Member Introduction

2.1 Building work has started on more than 2,000 new Council homes in the last five years. We are on track to finish and let 3,000 new homes by 2031. Building new homes is once again a fundamental part of what this Council does - and we do it well. This could not be more important – it will give thousands of Haringey children and adults the new start they deserve – a safe place to live, play and learn away from insecure, unsuitable, and overcrowded housing, and a chance to really put down roots and flourish in their community. This is something we can all celebrate.

2.2 As this report shows, the new homes the Council is delivering are built to the highest standards of sustainability and energy efficiency. Placemaking is central to our approach, so these new homes are bringing real improvements to their areas - including through new facilities and green spaces that bring greater biodiversity into the city. And we are designing these new homes to meet the individual needs of a wide range of people.

2.3 The last few years have been incredibly challenging for many people in Haringey. Covid and the rapid rises in the cost of essentials have hit lower-income households hardest. It has also been a financially challenging period for the Council - a decade of funding cuts, inflation and the increased costs of borrowing make it harder for us to meet the increasing levels of need. But we

are determined to do all we can to help Haringey residents through these difficult times. Building new Council homes shows how we can achieve that.

- 2.4 The proposals in this report will make sure we continue to deliver the excellent new homes people need and deserve. So I encourage Cabinet colleagues to approve the use of Right to Buy receipts towards seven new Council homes at Crawley Road, to agree budgets for homes already delivered at Harvey House and Finsbury Road, and to remove three unsuitable sites from the programme.

3. Recommendations

- 3.1 It is recommended that Cabinet:

- 3.1.1 Approve the removal of 3 sites from the programme: Land adjacent to 82 Muswell Hill Place, Stokley Court and Eade Road. Reasons for this are individual and set out in detail in the report.

- 3.1.2 Note the post-completion reports for the new council homes at Errol Cour (500 White Hart Lane), 27 Harvey House and 43 Finsbury Road, including financial information included in the Exempt Part B report.

- 3.1.3 Approve the retrospective overspend on 27 Harvey House and 43 Finsbury Road of £38,857 and £29,013 respectively.

- 3.1.4 Approve the use of retained Right to Buy (RtB) receipts as capital subsidy to support the delivery of seven new Council Rent homes at Crawley Road as detailed in paragraphs 6.31-6.34, to the total value detailed in the Exempt Part B report.

- 3.1.5 Note the continued success of the programme, the achievements to date against targets, and the forecast performance.

4. Reasons for decisions

- 4.1 The Corporate Delivery Plan (2022-24) commits to delivering 3,000 new council homes by 2031 and the suite of decisions contained in this report support this commitment through both site/project-specific decisions and proposed updates to procedures and processes. These decisions ensure that the Council continues to build up a pipeline of new sites to deliver a long-term sustainable Housing Delivery programme.

5. Alternative options considered

- 5.1 This paper is an update paper, and alternative options have been considered only for recommendations which are for approval rather than for note.
- 5.2 In regards to 3.1.1, the alternative option is that the sites remain in the programme. This would mean that more appropriate alternative future options for the sites would not be explored, which would result in a continued spend on project proposals for these sites that are currently identified as either unviable or unsuitable. For this reason, we have not proposed pursuing this alternative option.
- 5.3 In regard to 3.1.3, the schemes at Harvey House and Finsbury Road have been completed, and the overspend is being retrospectively approved. Therefore, no alternative can be considered, and these costs are contained within the current HRA business plan.
- 5.4 In regard to 3.1.4, the option of not using RtB receipts was considered, but would not make best use of the Council's time limited reserve of RtB funds to support the delivery of an otherwise unsubsidised project. In order to ensure best use of our available RtB receipts, this option was rejected.

6. Background information

- 6.1 After more than forty years in which no Council homes were built in Haringey, the delivery of high-quality Council homes has been re-established as an integral part of the Council's core business within a delivery programme that is viable in the long term.
- 6.2 The Housing Delivery Programme is about transforming the lives of thousands of Haringey people. It will provide affordable, secure homes of the right size to households on the Housing Register in the most pressing housing need.
- 6.3 The Council is using its programme to address the needs of homeless families and families living in overcrowded homes. At least a quarter of the homes built for the Council to rent by 2025 will have three, four, or more bedrooms – and work is done on every site to try to maximise the number of new larger homes. Overall, the programme is moving towards a target of 35% three-bedroom homes and 10% with four or more bedrooms.
- 6.4 More than 10% of the homes delivered through the programme will be fully accessible for wheelchair users. Households with disabilities giving rise to particularly hard-to-meet needs are being identified in order that homes can be designed specifically to meet those needs, as part of the housing delivery programme's 'bespoke homes' workstream.
- 6.5 This report is an update on the programme activities since the last report in January 2022, and provides updates for Cabinet across key programme themes and activities.

Update on the Council's Housing Delivery programme

- 6.6 In spite of the multiple challenges experienced across the construction market in the UK, the Council's housing delivery programme is currently on track to deliver 3,000 Council homes at Council rent by 2031.
- 2113 Council homes currently have planning permission across 51 sites.
 - 2027 Council homes have commenced construction across 41 sites.
- 6.7 Last year we completed and handed over 22 new homes across a range of new schemes including Romney Close, Mountview Court, Scales Road, and Tudor Close. We surpassed 2,000 starts on site and successfully claimed GLA grant funding to support our continued delivery of new council homes.
- 6.8 The GLA funding team audited 2 schemes in 2022, all of which were successful in evidencing good governance and appropriate record-keeping. The programme also underwent an internal audit and was awarded green, substantial assurance. The one recommended action was to carry out spot checks periodically against the programme and for issues to be fed back to improve ways of working. This has been implemented and has been complemented by the need to carry out reviews ahead of grant claims.
- 6.9 The majority of the programme is 'general needs' housing for Council rent, but our programme also includes supported housing for vulnerable groups in our borough who need help in their homes for a variety of reasons. For example, at Kerswell Close, new homes are being created for older residents who require assistance to live independently, while at Barbara Hucklesbury Close, we are hoping to develop a scheme that will provide care for residents with mental health needs. Other projects are looking to provide accommodation specifically for young people. With placemaking being central to our approach, many of our schemes are designed with welcoming, green communal areas, such as tree lined courtyards and quiet gardens. Offices and facilities for care staff are also provided on-site in some cases to help bring support closer to residents.
- 6.10 Sustainability is key to our programme. We are targeting zero-carbon development and applying Passivhaus principles wherever possible. While this hasn't been possible to achieve in every case, our schemes are averaging an 84% reduction in carbon in relation to building regulations. Air source heat pumps, solar panels and green roofs are included on our projects where possible, as well as measures to enhance biodiversity such as improved natural landscaping, tree planting, bat and bird boxes.
- 6.11 At Olive Morris Court the Council has sought to utilise modern methods of construction (MMC) such as modular units built off-site, to minimise build times, reduce local disruption and manage cost. We intend to maximise the potential benefits of MMC across the future programme. This aligns with the commitment the GLA requires from investment partners as part of their current 2021-26 funding programme. Haringey is also a member of a GLA-sponsored MMC 'Buyers Club' which is made up of a number of Local Authorities sharing ideas and practice on MMC and looking ahead to creating a future shared pipeline that could benefit from aggregate procurement.

- 6.12 Our MMC site that utilises the Seismic design for manufacture platform 'kit of parts' approach and is starting to create a buzz in the social housing development world is Woodridings Court. This project is a world first in residential house building, in using the Seismic platform approach to component manufacturing for housing. Planning permission was achieved last Autumn for 33 new homes, on a very constrained site behind an existing Haringey Council block, adjacent to railway lines.



Image of proposed development at Woodridings Court, new modular homes adjacent to the railway line (CGI)



Image of proposed development at Woodridings Court, with new modular homes shown to the rear (CGI)

- 6.13 Tudor Close, a development of 6 new council homes, pictured below, was successfully completed and completely let using our Neighbourhood Moves approach and the Bespoke Homes Programme. Our Neighbourhood Moves Programme gives existing secure council tenants priority for new council homes being built near them, maintaining communities, ensuring our tenants are suitably housed and also releasing council homes to rent through the move on the scheme creates.



Image of Tudor Close (CGI)

- 6.14 Our development at Mount View, pictured below, was completed in 2022 and contained the first council four bed homes built for a generation, replacing what was previously a derelict concrete hardstanding area that was repeatedly subject to fly tipping.



Image Mount View Court, finished in 2022.

- 6.15 Good progress is being made on many sites, with anticipated completions of a further 165 homes scheduled for 2023/24, including Walter Tull House. Completion of the Chocolate Factory development is anticipated for spring 2024, with a projected total of 668 homes to be delivered over the next 18 months.
- 6.16 Our Ashley Road depot development in Tottenham Hale will transform a site previously occupied by a waste facility near Down Lane Park to provide 272 new council homes and 2 commercial spaces. The development will also create new walking routes across the site to encourage pedestrian and bike travel to

the park, the Marshes, and Tottenham Hale district centre. The site will benefit from high-quality greening, landscaping and tree planting including benefits to the neighbouring park.



Image of the new development at Ashley Road Depot (CGI)

- 6.17 This year, we won the ‘Best Development Team (Urban)’ award at the Inside Housing Development awards. Last year, Olive Morris Court won in the ‘Best Healthy Homes Development’ category. Ishen Stewart-Dowding, a Project Manager in the Housing Delivery team, won the ‘Woman of the Future’ at the Women in Housing Awards 2022. Anna Blandford and Jack Goulde were also shortlisted for ‘Housing Hero’ awards. Denise Lindsay was awarded the Mayor’s Haringey Hero award in 2023 for her service to developing new homes for Haringey.
- 6.18 The team continues to succeed in its ‘grow your own’ approach to recruitment and progression, with two members of staff being promoted from the trainee project manager programme and a new round of three trainee project managers joining the team, one of whom successfully applied after concluding a placement with us via the Future of London’s Emerging Talent Programme. The Future of London network gives Londoners from ethnic minority backgrounds the opportunity to kick-start their careers in housing, development and regeneration by experiencing three placements in a range of built environment organisations. Throughout the course of the last 18 months, the department has hosted 3 placements from this Programme.

Removal of sites from the programme

- 6.19 There are a small number of sites which it is proposed are removed from the Housing Delivery programme, following due diligence, internal consultation and capacity and viability testing. Plans for the following sites to be removed from the programme are at Appendix 2:

a) **Land adjacent to 82 Muswell Hill Place:**

There is planning permission in place to develop a 3-bedroom home on this site, but the site is extremely constrained and it is not viable to bring forward this development within the current programme, so we propose that this site is removed from the Housing Delivery programme and the Council's Property Team will then progress alternative uses for this land.

b) **Stokley Court:**

This block currently comprises 47 1-bedroom flats, arranged across 3 buildings. Originally sheltered housing, Stokley Court was deregistered and designated a Good Neighbour Scheme around ten years ago. In March 2020 the block was included within the Housing Delivery programme to assess whether redevelopment, with the provision of replacement homes for existing residents and new council homes, was a potential option, especially as initial survey work had suggested the building was in a state of decline. However, following updated stock condition surveys and extensive feasibility studies for re-development, it is clear that while work is required to improve the condition of the building, demolition and re-build is not the optimum route. As a result, this scheme has been referred to the Housing Asset Management team for review with some clear directions from the surveys regarding work that is required in the near future.

c) **Eade Road:**

This site is currently unused green space sitting between houses facing onto Vale Road and a brick wall on Eade Road. Following initial due diligence and capacity design work, this site is deemed unsuitable for development given the topography, requirement to maintain retaining wall structures, and likely Rights of Light issues impacting neighbouring properties.

Post completion project quality review and final accounting (Gateway 5)

- 6.20 Since the last Cabinet update paper on the Council Housing Delivery Programme, a number of schemes have completed, and residents have moved into their new homes. Three schemes have been occupied for more than a year and these schemes have been reviewed and closed as part of the programme. These now form part of the 'general needs' portfolio managed by Housing Services. The three Gateway 5 schemes are the shop conversions at 27 Harvey House and 43 Finsbury Road, and the acquisition of 29 homes at Errol Court (500 White Hart Lane) from the developer Fairview Homes. Resident surveys were issued to all these homes, and full post-completion review reports (Gateway 5 Reports) for these projects can be found at Appendix 1
- 6.21 All three projects originated at the very beginning of the Housing Delivery programme, and as such they reflect the scale, skills and experience of the team at the time. There are a number of key lessons learned from the three projects, in particular relating to design and quality standards expected from our programme; processes and suitable authorisation for change control, additional works and cost variations; and the management of defects and aftercare.

- 6.22 Errol Court completed in March 2021, so residents have now been in occupation for over 2 years. The residents' survey for Errol Court had a low return rate (4 households, 14% of the total). Feedback from residents and officers reflected some issues with managing defects and aftercare, which is now a focus for the team.
- 6.23 At 27 Harvey House, a derelict shop has been converted into a 1 bedroom (2 person) flat. At 43 Finsbury Road, a shop has been converted into a 2-bedroom (4 person) house. Both projects completed in June 2021. The new residents at Harvey House responded to our survey to say that they were either satisfied or very satisfied with all aspects of their new home. The residents at Finsbury Road did not respond.
- 6.24 For both of the shop conversion projects delays due to the covid-19 lockdowns both during the planning period and on site added additional consultancy fees and contractor overhead costs, and additional works were specified post-planning to bring these projects up to our current environmental standards, resulting on overspend beyond the approved project contingency budgets. For the other remaining development which has concluded the final accounting and post-completion review, Errol Court, the project expenditure came in 4% under budget.
- 6.25 During the defect's liability period for these projects, no major defects were reported, and all issues were rectified. The residents at 27 Harvey House flagged an issue with suitable signage, utility metering and postal wayfinding for their new address, which has now been rectified, and improvements have been made to reflect this in the programme's guidance procedures, for future reference.

Overspend – retrospective approvals required for 27 Harvey House and 43 Finsbury Road

- 6.26 The Council's Contract Standing Orders and the approved Housing Delivery Programme procedures require that any overspend of over 5% of the approved total scheme cost requires Cabinet approval. Both of these shop conversion projects have overspent more than 5% beyond their original approved total budget, and thus retrospective Cabinet approval is required of the figures set out in 6.27 and 6.28 below.
- 6.27 The project expenditure for the Harvey House shop conversion went over budget by £38,857. This overspend was principally to undertake additional works at the end of the project to upgrade the property to achieve a reduction in carbon emissions and meet the council's current renewable energy targets (through increased insulation and the installation of an air source heat pump in place of a gas boiler). Delays on site and the covid lockdowns had already caused significant increases in construction costs and project fees, utilising the small budget contingency.
- 6.28 At Finsbury Road, there is an overspend of £29,013. This was due to unforeseen works identified once the works started principally relating to structural movement, an underground water chamber that hadn't been flagged

in previous building surveys and the need to remove a chimney and improve existing fire stopping measures to meet current building regulations; along with specification upgrades (improved insulation and the installation of an air source heat pump in place of a gas boiler) to meet the council's new net zero carbon target.

- 6.29 The Housing Delivery team's procedures and reporting practices have been updated following the handover of these two projects, to ensure that there are more robust change control processes and that any contract variations are matched with the necessary budgetary authorities and oversight, so that no further retrospective budgetary approvals are required. Our standard specifications and 'Employers Requirements' documents now require net zero carbon as a standard approach, so contractors would be pricing this in from the beginning. Finally the team's procedures around early due diligence and site surveys have been improved, to minimise the likelihood of additional costs arising from unforeseen underground structures, ground contamination or structural issues.



Errol Court, completed March 2021

Bespoke Homes Programme

- 6.30 Officers are now working to embed the Council's approach to 'bespoke homes' for co-design and detailed specification of new homes for households who have disabilities requiring specific adaptations into our typical development procedures. This will ensure that the Bespoke Homes Programme becomes part of the day-to-day activities of the development team. Each development project will include costs for the bespoke homes programme that will be included in the scheme's financial viability appraisals and where possible specific adaptations will be specified early as part of our construction contracts. The costs of the adaptations will be met through the Aids and Adaptations budget. It is important to note though specific costs and adaptations are not always known at procurement stage and in these scenarios an average cost will be included.

Use of Right to Buy receipts.

- 6.31 As a stock owning authority, LB Haringey retains the capital receipts from the sale of Council homes under the right to buy (RtB). The purpose of retaining these proceeds is to recycle the money back into the provision of replacement Council homes. The Government's preference is that the replacement homes are delivered through new build stock and encourages authorities to utilise RtB receipts as capital subsidy for this delivery. To further incentivise this, in the Spring 2023 Budget it was announced that councils can retain 100% of the RtB receipts they receive in the financial years 2022/23 and 2023/24. Previously, an administration fee was payable, in addition to the 'Treasury Share'; a percentage of the total sums received that was payable yearly to central Government.
- 6.32 Therefore, the Council is currently benefitting from a greater pot of receipts than in previous years and has an opportunity to channel more capital funding into supporting the Housing Delivery Programme. If the RtB funds are not recycled as capital subsidy to support the delivery of new Council homes, once the repayment moratorium ends in April 2024, after 5 years they will be paid in full to the Treasury and the benefit to the Council lost.
- 6.33 Cabinet is asked to approve the use of retained RtB receipts as capital subsidy to support the Crawley Road Housing Delivery project, to the value specified in the Exempt Part B report.
- 6.34 The purpose of utilising this subsidy in relation to the seven rented homes constituting this scheme is to facilitate the activity of the Temporary Accommodation (TA) acquisitions buy-back programme. In accordance with legislative changes governing use of RtB receipts effective from 1st April 2022, each home acquired as TA using RtB receipts as subsidy needs to be matched (currently one-for-one) to a new build home that also uses RtB receipts as subsidy. Crawley Road has been selected for matching for the following reasons:
- 6.34.1 RTB receipts and GLA capital grant cannot be utilised as subsidy on the same new build homes. Crawley Road did not already have an allocation

of GLA grant, meaning it was one of the few schemes eligible for RtB subsidy in the Housing Delivery Programme.

6.34.2 The matching takes place within the year the Council informs the Treasury (via the Housing Pooling Return) of work having commenced on site – in the case of Crawley Road this information will be passed to the Treasury in the current financial year (2023-24).

6.34.3 The number of homes (seven) at the Crawley Road site is appropriate for the number of planned TA acquisitions that did not already have matched new build homes allocated to them.

6.34.4 The scheme was approved with a marginal viability position when it entered the Housing Delivery Programme, and the approval of RtB receipts as subsidy will improve the financial return of the investment decision for the HRA.

7. Contribution to the Corporate Delivery Plan 2022-2024 High Level Strategic Outcomes

7.1 The Council's Housing Delivery Programme is playing a crucial role in achieving the outcomes under the CDP theme: 'Homes for the Future'. In particular the targeted outcomes to achieve 'an increase in the number and variety of high-quality and sustainable homes in the borough' and 'an improvement in the quality of housing and resident services in the social rented sector'.

7.2 The programme's target to achieve net zero carbon and Passivhaus standards across the programme is in line with the CDP theme: 'Responding to the Climate Emergency', in particular the outcome to create 'A Low Carbon Place'.

7.3 Our resident engagement and co-design activity across the programme reflects the CDP focus on inclusive public participation and collaboration. The outcomes delineated under the CDP Placemaking and Economy, and Safer Borough themes are reflected in the approach the team are taking to design and planning, as well as 'Leveraging Social Value' through our construction and consultancy contracts.

8. Carbon and Climate Change

8.1 As detailed in the report above, sustainable development and minimising the carbon generated through the construction and operation of new homes is a key focus of the Council's Housing Delivery programme. All our schemes target zero-carbon development on-site and apply Passivhaus principles wherever possible, averaging an 84% reduction on building regulations. A number of our projects are planned to connect to the Borough's proposed District Energy Network, and all are designed in a 'fabric first' way to reduce the need for complicated technology, maximising insulation, and building efficiency, thus reducing energy costs for tenants.

- 8.2 We have developed a Carbon Management specification as part of our typical contract 'Employer's Requirements' to ensure a consistency in the approach to designing for carbon reduction in the use of sustainable materials. Across the programme we are also implementing modern methods of construction (ranging from components to full modular systems) to ensure our new homes are more efficiently constructed and reducing the carbon impact of time spent on site.
- 8.3 Many of the schemes are also modelled to reduce the risk of overheating. This will ensure that in a changing climate the properties and residents living in them do not overheat.

9. **Statutory Officers comments**

Finance

- 9.1 The HRA Financial plan approved by Cabinet in February 2023 was developed with the flexibility to add/remove sites in the programme while ensuring that the HRA plan remains viable over a long-term; and this is constantly reviewed.
- 9.2 Removal of the 3 sites from the programme would mean a reduction in the capital cost in the plan. In addition, there is the risk that some of the cost incurred will be abortive.
- 9.3 Two of the three schemes highlighted in the report showed slight cost overspend against their budgets. These were met within the HRA budgets/MTFS for the relevant years.
- 9.4 The use of retained Right to Buy (RTB) receipts as capital subsidy on the new Council Rent homes at Crawley Road will unlock the use of RTB receipts on existing homes acquisition in line with the new rules around use of RTB receipts.
- 9.5 Finance will continue to review the HRA modelling assumptions considering macro and micro economic factors (in conjunction with the service) to ensure the long-term viability of the HRA.

Procurement

- 9.6 Strategic Procurement (SP) has no concerns regarding the recommendation in section 3 above.

Head of Legal & Governance

- 9.7 The Head of Legal and Governance (Monitoring Officer) has been consulted in drafting this report.
- 9.8 The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendations in the report.

Equality

- 9.9 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
 - Advance equality of opportunity between people who share those protected characteristics and those people who do not.
 - Foster good relations between people who share those characteristics and people who do not.
- 9.10 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 9.11 The groups most likely to be directly affected by the creation of new homes for council rent provided by the Council's Housing Delivery Programme are Haringey residents living in temporary accommodation and Haringey residents who are at risk of homelessness. Data held by the Council suggests that women, young people and BAME communities are over-represented among those living in temporary accommodation. Individuals with these protected characteristics as well as those who identify as LGBTQ+ and individuals with disabilities are also known to be vulnerable to homelessness, as detailed in the Equalities Impact Assessment (EqIA) of the Council's Draft new Housing Strategy. As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics.
- 9.12 The asks the Cabinet to note progress made to date with regards to the Council's housing delivery programme and to note a number of elements within the programme and are not for decision.
- 9.13 In regard to 3.1.1, removing schemes from the development programme is not considered to have an equalities impact as these were at a feasibility stage, with options being explored for the sites.
- 9.14 In regard to 3.1.3, the projects at Harvey House and Finsbury Road are completed, and the overspend is being retrospectively approved. These schemes provided homes for social rent and the decision therefore represents a step to meet the needs of those in housing need in the borough.

9.15 In regard to 3.1.4, this approval seeks to support the delivery of homes for social rent and also to facilitate the acquisition of homes for temporary accommodation. The decision therefore represents a step to meet the needs of homeless households in the borough.

10. **Use of Appendices**

- Appendix 1 – Gateway 5 Reports for Errol Court, 27 Harvey House and 43 Finsbury Road
- Appendix 2 - Plans for the sites to be removed from the programme – Stokley Court, adjacent to 82 Muswell Hill Place and Eade Road
- Part B - EXEMPT – Use of retained Right to Buy receipts and commercial information exempted from the Gateway 5 reports at Appendix 1

11. **Background papers**

11.1 No background papers.

11.2 Part B of this report is NOT FOR PUBLICATION by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972. This is not for publication as it contains information classified as exempt under Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information).