

Summary: Intervention & Options

Department /Agency: DWP	Title: Impact Assessment of “Supporting people into work: the next stage of Housing Benefit reform”	
Stage: Consultation	Version: 15/12/2009	Date: 15/12/2009
Related Publications:		

Available to view or download at:

<http://www.dwp.gov.uk/consultations>

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What is the problem under consideration? Why is government intervention necessary?

“*Supporting people into work: the next stage of Housing Benefit reform*” sets out the Government’s plans to reform Housing Benefit.

What are the policy objectives and the intended effects?

This consultation sets out how we will reform Housing Benefit to deliver a simpler and fairer system of housing support which pays a fair rate of benefit to customers whilst also protecting the taxpayer. It also sets out principles for long-term reform of Housing Benefit.

What policy options have been considered? Please justify any preferred option.

- 1) Reform proposals for those on Housing Benefit who move into work or receive Housing Benefit while in work;
- 2) Reform proposals for Housing Benefit in the Private Rented Sector;
- 3) The long-term reform of Housing Benefit.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

This is a consultation stage Impact Assessment. The policy will be reviewed in the light of responses to the consultation.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options

Signed by the responsible Minister:

.....Date:

Summary: Analysis & Evidence

Policy Option:	Description:
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COSTS	ANNUAL COSTS	Description and scale of key monetised costs by 'main affected groups' The costs reported are indicative ranges for measures that may increase benefit expenditure and relate to costs of paying additional benefit. The precise figure would depend on the policy design and implementation following the consultation.
	One-off (Transition) Yrs £ 0	
	Average Annual Cost (excluding one-off) £ 0 – 200m	
	Total Cost (PV)	
Other key non-monetised costs by 'main affected groups'		
BENEFITS	ANNUAL BENEFITS	Description and scale of key monetised benefits by 'main affected groups' The savings reported are indicative ranges for measures that may decrease benefit expenditure and relate to savings due to reduction in benefit. The precise figure would depend on the policy design and implementation following the consultation.
	One-off Yrs £ 0	
	Average Annual Benefit (excluding one-off) £ 0 – 300m	
	Total Benefit (PV)	
Other key non-monetised benefits by 'main affected groups': Increased employment and the productive potential of the economy. Beneficial impact on the environment by improved quality and energy efficiency of housing.		

Key Assumptions/Sensitivities/Risks: These early cost and benefit estimates are indicative. We are unable to be more precise at this stage, because many of the details of the policies will be determined only following the responses to the consultation. In addition, we may decide to test some of the proposals through pilots before considering how best to implement nationally. Present values were considered over a 5-year period.

Price Base Year 2009	Time Period Years 5	Net Benefit Range (NPV) £ -900 – 1400m	NET BENEFIT (NPV Best estimate) £ 250 m
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What is the geographic coverage of the policy/option?	GB				
On what date will the policy be implemented?	From 2010 onwards				
Which organisation(s) will enforce the policy?	LAs and DWP				
What is the total annual cost of enforcement for these organisations?	£				
Does enforcement comply with Hampton principles?					
Will implementation go beyond minimum EU requirements?					
What is the value of the proposed offsetting measure per year?	£				
What is the value of changes in greenhouse gas emissions?	£				
Will the proposal have a significant impact on competition?					
Annual cost (£-£) per organisation (excluding one-off)	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%; text-align: center;">Micro</td> <td style="width: 25%; text-align: center;">Small</td> <td style="width: 25%; text-align: center;">Medium</td> <td style="width: 25%; text-align: center;">Large</td> </tr> </table>	Micro	Small	Medium	Large
Micro	Small	Medium	Large		
Are any of these organisations exempt?					

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)
Increase of £	Decrease of £	Net Impact £

Key: Annual costs and benefits: Constant Prices (Net) Present Value

Introduction and Context

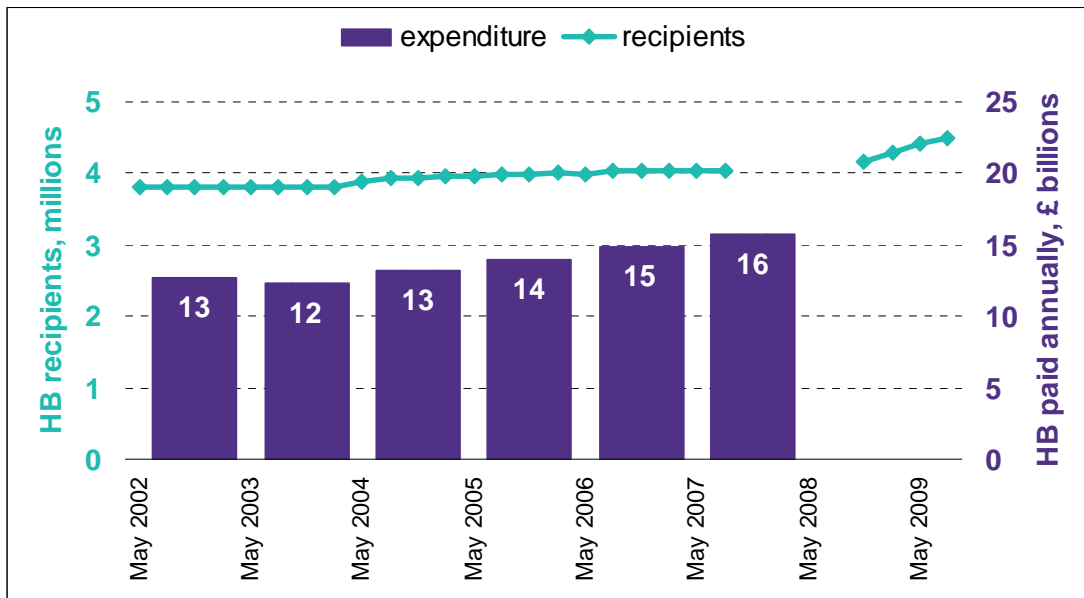
1. In December 2008 the Government announced a commitment to seek views on changes to Housing Benefit.¹ The consultation document “*Supporting people into work: the next stage of Housing Benefit reform*” sets out options for the next steps for Housing Benefit reform. The impact of the measures therein is laid out in this Impact Assessment under the following sections:
 - a. *Supporting people into work*
 - b. *A fair and affordable system*
2. The purpose of this impact assessment is to provide an evidence-based assessment of the impacts of the measures contained in the consultation document. Some of these proposals set out general reform principles and as a result the precise impact will depend on design and implementation considerations. In particular, this is the case for the consultation document topics around decent housing and the long-term direction of reforms. As the policies are developed further the impact assessment will be updated to reflect this.
3. The impact assessment considers race equality, gender equality and disability equality. It does not consider age equality because most of the proposed measures affect working age customers only. Nor does it consider sexual orientation equality or religious belief equality, as there is no reason to believe that Housing Benefit will have any different impacts on these groups.

Housing Benefit Background

4. Housing Benefit (HB) is paid to tenants on low incomes, irrespective of employment status, disability or age group and can be paid in conjunction with any other benefit. Consequently, HB is available to those in-work and out-of-work, the elderly and those of working age, those who are in receipt of disability benefits and those who are not.
5. Housing Benefit helps around 4.5 million households to meet their rent, at a cost of nearly £16 billion in 2007/08. The number of HB recipients and expenditure is shown in Figure 1.

¹ DWP Welfare Reform White Paper “*Raising expectations and increasing support: reforming welfare for the future*”.

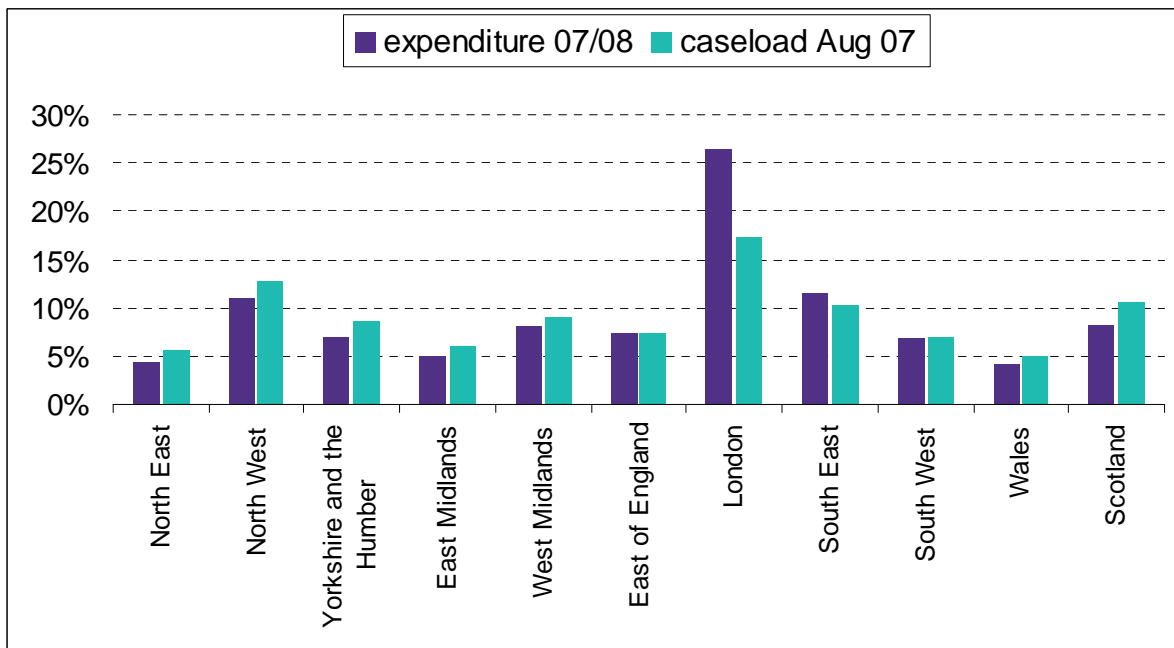
Figure 1 : Housing Benefit recipients and expenditure



Source: Published expenditure and caseload statistics.² No information on caseload is available between Aug 2007 and Aug 2008 at the time of publication. Expenditure amounts relate to financial years.

6. Figure 2 shows the breakdown of caseload and expenditure by country and Government Office Region, expressed as percentages of the total caseload and expenditure in Great Britain.

Figure 2 : Regional breakdown of Housing Benefit recipients and expenditure

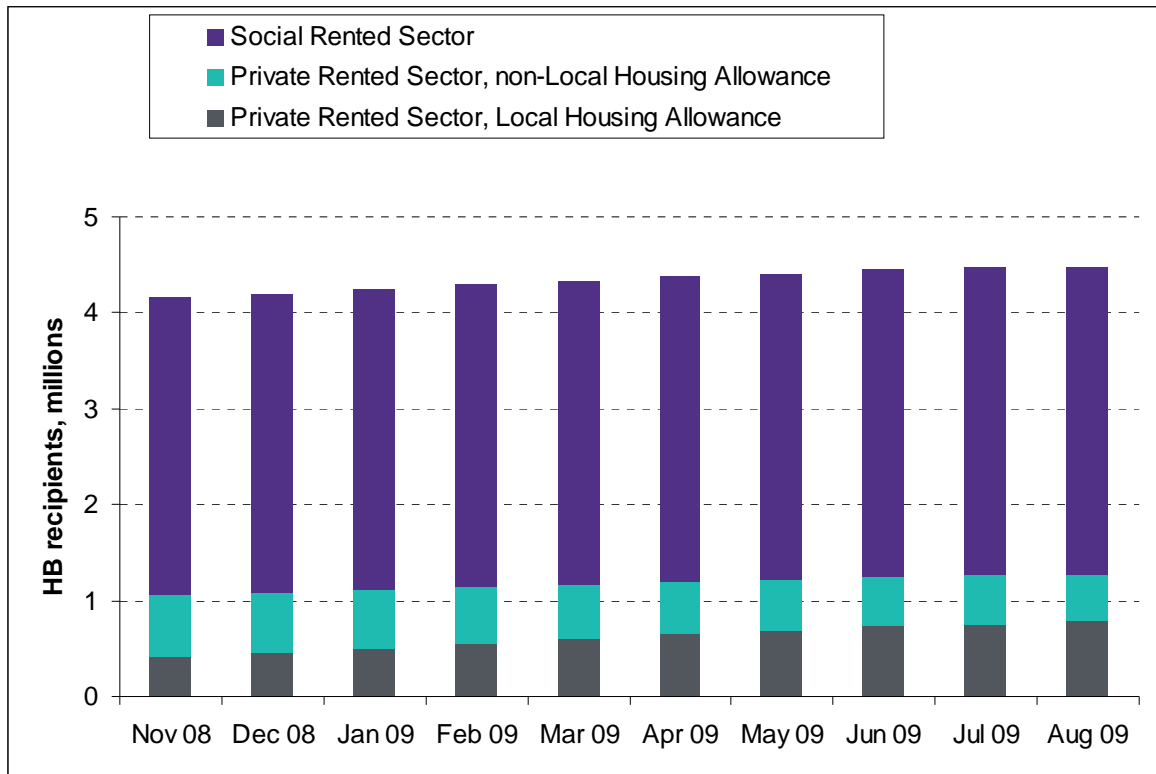


Source: Published expenditure and caseload statistics.

7. The breakdown of the HB caseload by tenure type over recent months is presented in Figure 3.

² Published HB statistics are available online at http://research.dwp.gov.uk/asd/statistics_a_to_z.asp#h

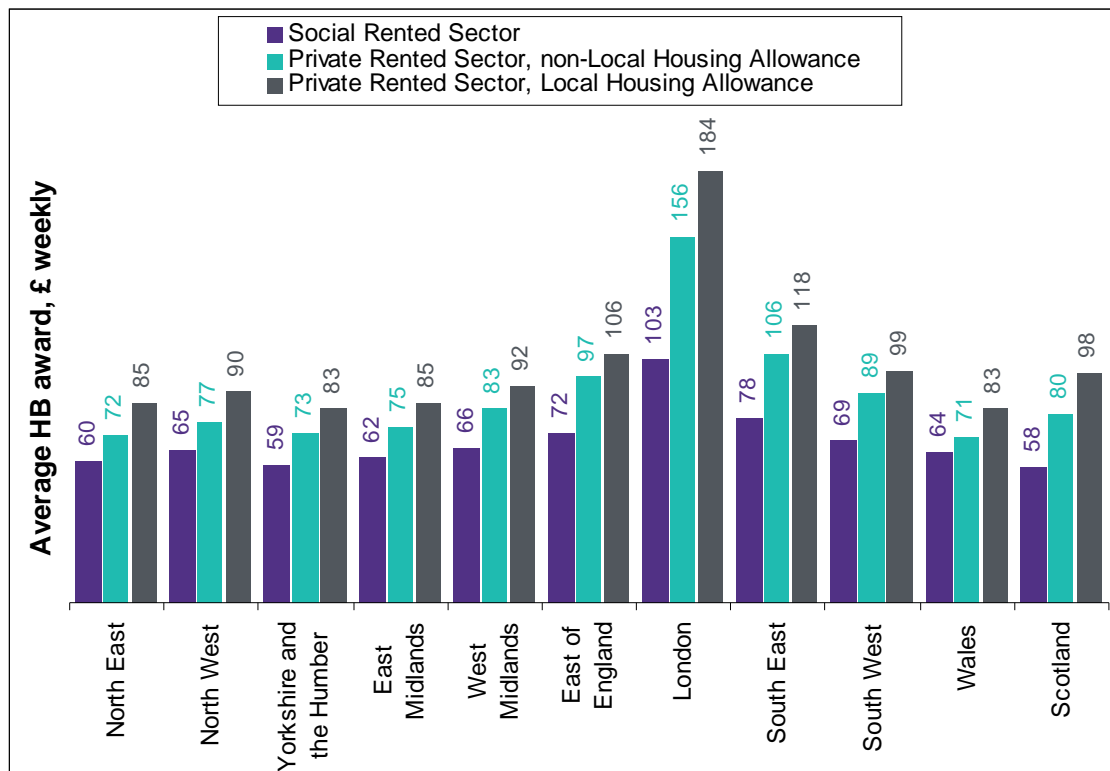
Figure 3 : Housing Benefit recipients by tenure type



Source: Published National Statistics.

8. Figure 4 shows the average HB awards across the Government Office regions. The higher average awards in London reflect the higher rent levels in the capital.

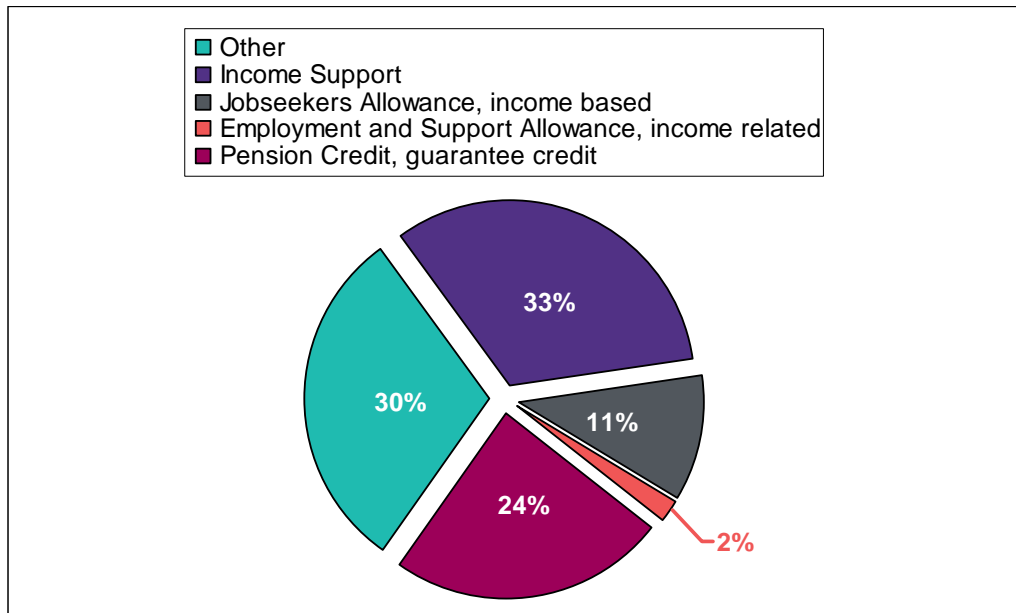
Figure 4 : Regional breakdown of average Housing Benefit awards



Source: Based on published National Statistics, August 2009.

9. Figure 5 shows the overlap of HB with other income-tested benefits. A large proportion of HB customers are out of work: around 70% of HB customers receive the maximum level of HB, because they are in receipt of Income Support, income-based Jobseeker's Allowance or Employment and Support Allowance, or Pension Credit Guarantee Credit.

Figure 5 : Breakdown of HB recipients by passporting benefit



Source: Published National Statistics August 2009.

A) Supporting people into work

Introduction and policy rationale

10. The HB rules are designed so that generally no one who moves into work would be worse off in monetary terms. And the administration of the benefit system has improved in recent years. But a combination of factors—such as low awareness that HB is payable in work and concerns about the complexity of the system—means that HB can be perceived as a barrier to work.
11. The proposals in the consultation document are:
 - a. Transition into work payments—to make the system less sensitive to individual changes of circumstances and to ease the transition into work, by prolonging the support available for those moving into work;
 - b. Fixed period awards—for those who receive in-work HB, to make the benefit calculation less responsive to changes of circumstances.

Estimating Costs and Benefits

<i>Proposal</i>	<i>Economic Costs</i>	<i>Economic Benefits</i>	<i>Fiscal Benefits</i>	<i>Wider Benefits</i>
(a) Introduce transition into work payments (b) Introduce fixed period awards	Programme costs associated with paying additional Housing Benefit.	These measures have the potential to encourage a significant number of people back into work and support them once in work.	If more people move into work there will be reduced numbers of people claiming unemployment benefits and increased tax and National Insurance Contributions.	Reduction in poverty and improvement in life chances if more people move into work.

Equality Impact Assessment

12. The measures for easing the transition to work are designed to assist two groups of HB recipients:
 - a. The “transition into work payments” would extend help to those who are receiving out-of-work HB when moving into work;
 - b. The “fixed period awards” would help those who are receiving in-work HB and those who move into work.
13. The following sections aim to present a breakdown of the characteristics of the in-work and out-of-work HB groups by race, gender and disability.

Race equality

14. Table 1 shows estimates of the proportion of the working age population who are claiming HB, broken down by their employment status and the ethnicity of the head of the benefit unit. For HB customers who are out of work, about 87% are white and 13% ethnic minority. For HB customers who are in work about 84% are white and 16% ethnic minority.
15. The corresponding proportions for HB overall are approximately 86% and 14% respectively. As a result neither the “transition into work payment” nor the “fixed period award” measures are expected to have a disproportionate impact on the white or ethnic minority populations.

Table 1 : Proportion of the working age population by ethnicity and HB receipt

Working age breakdown	Out of work, on HB	In work, on HB	All working age on HB	All working age renters
White	87%	84%	86%	85%
Ethnic minority	13%	16%	14%	15%
Any ethnicity	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Out-of-work is defined as no one in the benefit unit being in work. Ethnicity refers to ethnicity of the head of the benefit unit. Working age is defined as the head of the benefit unit being under 60 years old.

Gender equality

16. Table 2 shows the gender split of the working age population, broken down by HB and employment status. Among the out-of-work HB group, 20% are couples, 52% have a female head of household and 28% have a male head of household. For all working age HB customers, 23% are couples, 52% have a female head of household and 25% have a male head of household. As a result, the “transitions into work payments”, aimed at out-of-work HB customers, are not expected to have a disproportionate impact on the two groups.
17. For the in-work HB group, who would benefit from the “fixed period award” proposal, the gender split is 37% couples, 52% female and 11% male, a lower proportion of male-headed households than for the overall working age population.
18. As a result the proposals for in-work “fixed period awards” are expected to benefit relatively fewer males than females without a partner as there is a smaller proportion of this group receiving in-work HB.

Table 2 : Proportion of the working age population by gender and HB receipt

Working age breakdown	Out of work, on HB	In work, on HB	All working age on HB	All working age renters
Couples	20%	37%	23%	35%
Female	52%	52%	52%	36%
Male	28%	11%	25%	28%
Any gender	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Female and male relate to customers without a partner. Out-of-work is defined as no one in the benefit unit being in work. Working age is defined as the head of the benefit unit being under 60 years old.

Disability equality

19. Table 3 shows estimates of the proportion of the working age HB population who have a disability. This is defined for the purposes of this assessment as someone in the benefit unit receiving the highest rates of Disability Living Allowance (DLA) or Attendance Allowance (AA).
20. The table shows that around 16% of the out-of-work HB group are in a benefit unit which receives a disability benefit versus 84% who are not. The corresponding figures for all working age HB benefit units are similar, namely 14% and 86% respectively. As a result the impact of the “transitions into work payments” aimed at out-of-work HB customers is expected to have a similar impact on people with disability as the general working age population.
21. With regards to the in-work HB group, who would benefit from the “fixed period awards” proposal, only 5% of this group are in a benefit unit that is in receipt of a disability benefit, a much lower proportion than all benefit units headed by someone of working age.
22. This suggests that “in-work fixed benefit periods” would have a smaller impact on benefit units who are in receipt of a disability benefit, for the reason that this group is under-represented in the in-work HB population and as a result potentially stands to benefit less from a policy aimed at those in work.

Table 3 : Proportion of the working age population by disability and HB receipt

Working age breakdown	Out of work, on HB	In work, on HB	All working age on HB	All working age renters
In receipt of a disability benefit	16%	5%	14%	6%
Not in receipt of a disability benefit	84%	95%	86%	94%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Receipt of a disability benefit refers to someone in the benefit unit receiving the highest rates of DLA or AA. Out-of-work is defined as no one in the benefit unit being in work. Working age is defined as the head of the benefit unit being under 60 years old.

B) A fair and affordable system

23. “*Supporting people into work: the next stage of Housing Benefit reform*” explores measures that aim to make housing benefit fairer in the Private Rented Sector, in particular, setting out options for:

- a. clearer geographical areas to set rates;
- b. fairer size criteria;
- c. fairer benefit rates.

24. The third component relates to a section of the consultation document on how fairer benefits rates can be applied. However no specific measure is being proposed so no quantitative assessment of the impact is possible at this stage.

Estimating Costs and Benefits

<i>Proposal</i>	<i>Economic Costs</i>	<i>Economic Benefits</i>	<i>Fiscal Benefits</i>	<i>Wider Benefits</i>
(a) Clearer geographical areas to set rates (b) Fairer size criteria (c) Fairer benefit rates	Small administrative costs associated with the transition and delivering these changes. Programme costs if LHA rates increase.	Programme savings if LHA rates decrease.	If more people move into work there will be reduced numbers of people claiming unemployment benefits and increased tax and National Insurance Contributions.	Promotes fairness and prevents social exclusion. Potential for simplification in HB administration.

(a) Clearer geographical areas to set rates

Introduction and policy rationale

25. The Local Housing Allowance (LHA) was introduced nationally in April 2008 for new HB customers in the deregulated Private Rented Sector (PRS), following a period of testing in 18 local authority areas.
26. As part of the national rollout of the LHA, comparisons of rents were based on a new type of reference area, the Broad Rental Market Area (BRMA). These areas are determined and maintained by rent officers³, as prescribed within legislation which sets out the criteria that they should take into consideration when determining these areas.
27. BRMAs are already subject to regular review and, if boundaries change, benefit rates for any HB customer living in the PRS are potentially affected. HB recipients in the Social Rented Sector (SRS) will not be affected, as their benefit entitlement is not assessed using the LHA rules.
28. It is difficult to identify at this stage those who would gain and those who would lose if BRMAs change. This is because it will depend on the areas chosen, the method used to set rates within them, behavioural changes and transitional protection issues. As the policies evolve the impact assessment will be updated.
29. The number of HB customers in the PRS and SRS is shown in Table 4.

Table 4 : Breakdown of HB customers by tenure

	Social rented sector	Private rented sector, LHA	Private rented sector, non-LHA	All HB
HB customers	3,193,050	782,950	489,510	4,494,560
Percent	71%	17%	11%	100%

Source: Published National Statistics for Aug 2009. The last column includes a small number of recipients of 'unknown' tenure. The 'non-LHA' column includes pre-1989 regulated tenancies.

Equality Impact Assessment

30. Any reforms to the LHA would affect some HB recipients in the (deregulated) PRS. Note that the LHA is being introduced gradually, applying only to new HB customers or customers who change address. So the number of people affected by any reforms to the LHA will grow over time as customers migrate from the pre-LHA scheme onto the LHA.
31. The next sections present the breakdown of the PRS into the relevant groups.

³ These are officers from the Valuation Office Agency (Rent Officer Services) in England, the Welsh Assembly Government (Rent Officers Wales) and the Scottish Executive (Rent Registration Service).

Race equality

32. Table 5 shows the breakdown of the PRS HB customers by the ethnicity of the head of the benefit unit. 87% are of white ethnic origin and 13% of ethnic minority origin.
33. The corresponding figures for the entire HB population are 90% and 10% respectively. This suggests that changes to the LHA rules as a whole are not expected to affect one group disproportionately more than the other.

Table 5 : Breakdown of HB customers by ethnicity

	Private rented sector, on HB	Social rented sector, on HB	All renters on HB	All renters
White	87%	90%	90%	87%
Ethnic minority	13%	10%	10%	13%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Ethnicity refers to the head of the benefit unit.

Gender equality

34. Table 6 presents the characteristics of PRS customers broken down by the gender of the head of the benefit unit. Around 50% of the PRS HB benefit units are headed by a female person without a partner, versus 27% for males without a partner and 22% for couples. For HB customers as a whole the breakdown is very similar, 53% versus 25% and 22% respectively. This suggests that changes to the LHA rules as a whole are not likely to impact disproportionately on one gender.

Table 6 : Breakdown of HB customers by gender

	Private rented sector, on HB	Social rented sector, on HB	All renters on HB	All renters
Couples	22%	21%	22%	33%
Female	50%	54%	53%	40%
Male	27%	24%	25%	28%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Female and male relate to customers without a partner.

Disability equality

35. Table 7 presents estimates of the breakdown of PRS HB customers by disability status. This is defined for the purposes of this assessment as someone in the benefit unit receiving the highest rates of Disability Living Allowance (DLA) or Attendance Allowance (AA). About 11% of PRS HB benefit units are in receipt of a disability benefit versus 89% who are not.
36. The corresponding proportions for HB as a whole are 17% and 83% respectively suggesting that benefit units in receipt of disability benefits are less likely to be affected by changes to the LHA as a whole. This is because HB customers with disabilities are more likely to be in the social rented sector.

Table 7 : Breakdown of HB customers by disability

	Private rented sector, on HB	Social rented sector, on HB	All renters on HB	All renters
In receipt of a disability benefit	11%	18%	17%	9%
Not in receipt of a disability benefit	89%	82%	83%	91%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Receipt of a disability benefit refers to someone in the benefit unit receiving the highest rates of DLA or AA.

(b) Fairer size criteria

Introduction and policy rationale

37. This measure will also impact only on the PRS. For customers whose benefit is assessed according to the LHA rules, the amount of HB is determined according to the “bedroom entitlement” of the household. The bedroom entitlement is calculated based on the number of members of the household and the ages and gender of any children, assuming that younger children share bedrooms.
38. The bedroom entitlement is used to determine the LHA rate that applies for the HB assessment, and is not related to the actual number of bedrooms in the property the household resides in.
39. The proposals set out for consultation discuss the method used to determine the bedroom entitlement and the assumptions on sharing among children. As a result, measures that alter the bedroom entitlement for children would potentially affect customers with two or more dependant children. However not everyone in this group would be affected equally and some may not be affected at all; this will depend on the details of the design and implementation of alternative calculations of bedroom entitlement.
40. The consultation also includes proposals for a more generous bedroom entitlement formula for those who require an extra bedroom for a non-resident carer or those with shared custody of non-resident children. It is difficult at this stage to quantify the beneficial impact to these groups, as this will depend on the design and implementation details of the proposals. Moreover, there is a lack of HB data to identify the numbers benefiting, as information is not collected on the shared custody arrangements of children.
41. Table 8 presents an estimate of the breakdown of the HB PRS customers by the number of children in the benefit unit. Around 77% of benefit units have no children or only one child and will not be affected by measures that change the sharing of bedrooms among children.
42. Note that the sample sizes contained in the Family Resources Survey for households with five or more children are small and as a result the percentages derived from them should be treated with caution.

Table 8 : Breakdown of the HB customers by number of children

	Private rented sector	Social rented sector	All renters on HB	All renters
No children	55%	70%	67%	73%
1 child	22%	14%	15%	14%
2 children	13%	10%	10%	9%
3 children	6%	4%	4%	3%
4 children	2%	1%	2%	1%
5 or more	1%	1%	1%	0%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8).

Equality Impact Assessment

Race equality

43. Table 9 presents a breakdown of PRS customers by the ethnicity of the head of the benefit unit.
44. Ethnic minority benefit units tend to have higher numbers of children in the household than those of white ethnicity. The percentage of benefit units of white ethnicity with two or more children is around 21% of total PRS HB customers, while the corresponding percentage for ethnic minority benefit units is 30%.
45. This difference suggests that changes that affect households with a large number of children could affect ethnic minority benefit units more, compared to those of white ethnic origin. This is because on average ethnic minority benefit units on HB tend to have larger families (although there is considerable variation between ethnic groups).

Table 9 : Breakdown of the HB PRS customers by number of children and ethnicity

<i>PRS breakdown</i>	White	Ethnic minority	All PRS HB	All PRS renters
No children	57%	44%	55%	78%
1 child	21%	26%	22%	12%
2 children	13%	15%	13%	7%
3 children	6%	8%	6%	2%
4 children	1%	5%	2%	1%
5 or more	1%	2%	1%	0%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Ethnicity refers to the head of the benefit unit.

Gender equality

46. Table 10 shows estimates of the percentages of the benefit units on HB in the PRS broken down by number of children and the gender of the head of the benefit unit. Excluding couples, benefit units headed by a female are much more likely to have children than those headed by males. This is a reflection of lone parents being much more likely to be female than male.

Table 10 : Breakdown of the HB PRS customers by number of children and gender

PRS breakdown	Couples	Female	Male	All PRS HB	All PRS renters
No children	43%	41%	93%	55%	78%
1 child	25%	30%	4%	22%	12%
2 children	18%	18%	2%	13%	7%
3 children	9%	8%	1%	6%	2%
4 children	4%	2%	0%	2%	1%
5 or more	1%	1%	0%	1%	0%
All	100%	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Female and male relate to customers without a partner.

Disability equality

47. Table 11 shows the breakdown of PRS HB customers by receipt of a disability benefit. This is defined for this assessment as someone in the benefit unit receiving the highest rates of DLA or AA. A lower proportion of benefit units receiving a disability benefit have two or more children. This suggests that benefit units who receive a disability benefit are likely to be less affected by changes in sharing of bedrooms in the LHA calculation.

Table 11 : Breakdown of the HB PRS customers by number of children and disability

PRS breakdown	In receipt of a disability benefit	Not in receipt of a disability benefit	All PRS HB	All PRS renters
No children	79%	53%	55%	78%
1 child	9%	24%	22%	12%
2 children	8%	14%	13%	7%
3 children	2%	7%	6%	2%
4 children	2%	2%	2%	1%
5 or more	0%	1%	1%	0%
All	100%	100%	100%	100%

Notes: Based on three years of Family Resources Survey data (2005/6 to 2007/8). Receipt of a disability benefit refers to someone in the benefit unit receiving the highest rates of DLA or AA.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	No
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	No
Carbon Assessment	No	Yes
Other Environment	No	Yes
Health Impact Assessment	No	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	No	No
Rural Proofing	No	Yes

Specific impact tests

New Burdens Doctrine

48. Our intention is that none of the measures will constitute a new burden to local authorities that would have to be funded by an increase in Council Tax.

Organisations in the Third sector and the Small Firms Impact Test

49. At this stage none of the proposals is expected to lead to costs or savings for businesses.
50. Proposals to improve the quality and environmental efficiency of the PRS may impact on private landlords. We shall assess the effects in the event of proposals being taken forward following the consultation.

Rural proofing

51. Rural proofing is a commitment by Government to ensure that all its domestic policies take account of rural circumstances and needs.
52. We shall take into consideration any differential rural and urban impacts of our proposals as we develop them further.

Carbon assessment and environmental impact

53. The environmental impact test enables Government departments to understand and quantify the environmental consequences of their proposals. Since 2003, the Government has committed itself to making a carbon Impact Assessment an integral part of assessing environmental impacts of policies.
54. The consultation topic area on improving housing standards and the carbon footprint of properties in the private rented sector may, depending on the outcome of the consultation, have a beneficial environmental impact.
55. As the policies evolve, we will continue to assess the environmental benefit of the proposals and aim to quantify the monetised value of the environmental impact, in accordance to the Defra and HM Treasury guidelines.