

Report to Housing Scrutiny Standing Panel



SCRUTINY



Date of meeting: 23 March 2009

Subject: "Changes to the Revenue and Capital Rules for New Council Housing"- CLG Consultation Document : Council's Response

Officer contact for further information: Alan Hall, Director of Housing (01992 56 4004)

Committee Secretary: Mark Jenkins, Office of the Chief Executive (01992 56 4607)

Recommendations/Decisions Required:

That the Scrutiny Panel considers the draft response from the Housing Portfolio Holder to the Government's Consultation Paper "Changes to the Revenue and Capital Rules for New Council Housing", and provides any comments to the Portfolio Holder.

Report:

Introduction

The Council has received a consultation document from the Government's Communities and Local Government Department entitled "Changes to the Revenue and Capital Rules for New Council Housing". A copy of the Consultation Paper is provided at Appendix 2.

The Housing Portfolio Holder has prepared a draft response to the Consultation Paper, which is provided at Appendix 2. However, before finalising his response, he would first like to consult members of the Housing Scrutiny Panel and members of the Tenants and Leaseholders Federation. The Federation will consider the draft response at its meeting to be held on 24th March 2009.

Government's Proposals

In essence, the Consultation Paper proposes the removal of the current disincentives for local authorities to build new social housing themselves.

For the last 20 years, successive governments have discouraged local authorities from building new council housing, and have encouraged them to be "enablers" or "facilitators" of new social housing, provided by housing associations. In order to discourage local authorities, there have been two main financial disincentives:

- (a) Local authorities have not been able to keep all of the rental income received for its housing stock. Instead, they are only allowed to retain the notional running costs associated with the property (i.e. management, maintenance and major repairs) and not the financing of the capital costs to build the property.

As a result, many local authorities (like Epping Forest) are in "negative housing subsidy", which means that they must pay the Government a percentage of their rental income each year.

In the case of EFDC, the amount of negative subsidy expected to be paid to the Government in 2009/10 is around £11.2m, representing 44% of the estimated rental income. This money is then re-distributed by the Government to other local authorities in "positive" housing subsidy and to fund other Government housing initiatives.

(b) When properties are sold under the right to buy, the Council must pay 75% of the net capital receipt to the Government – only 25% is retained by the Council, which can be used to either fund capital projects, or to generate investment income for the General Fund. The Government says that this percentage was set to roughly reflect the historic split between national and local investment in council housing.

Since this capital rule also applies to any new housing built by a Council, the Council could make a loss if such properties are subsequently sold.

The Consultation Document sets out proposals to remove these two major disincentives, by changing the revenue and capital rules and allowing local authorities to:

- Retain all of the rental income received from new properties (built after the introduction of the changes); and
- Retain all of the capital receipts from the sale of properties that were built after the introduction of the changes.

The Government is proposing a scheme whereby specific **new** properties are excluded from both the HRA subsidy system and the capital rules. This would be done through specific agreements between individual local authorities and the Secretary of State. The types of properties that would qualify for exclusions under the proposed scheme are:

- New-build properties
- Properties purchased or otherwise acquired
- Derelict or uninhabitable properties brought back into use as a result of significant council investment

It is proposed that local authorities apply for an exclusion for new developments (or acquisitions) to the new Homes and Communities Agency (which has taken over the former Housing Corporation's funding role), who will advise the Secretary of State on whether the exclusion should be allowed.

Applications should include details about the proposed development, including design and development standards, rents and allocation policies. If agreed, the Secretary of State will issue a short letter of agreement in a standard form.

The Consultation Document emphasises that, although decisions on how a local authority chooses to invest its own resources is essentially a local matter, in granting an exclusion, the Secretary of State would expect to see evidence that "appropriate local decision-making processes have been applied, including a robust options appraisal, and that the chosen option offers value for money". The Consultation Document also states that the Government only expects to exclude properties that conform to all Government policies regarding council housing.

The Document explains that the Government will also have to consider the overall impact on its fiscal policies when considering applications for exclusion.

Clearly, if the proposals are introduced, the Council will need to carefully consider its proposed approach. Key issues will be:

- Whether or not the Council has the capacity and skills to undertake new house building itself (for example, the Council now only has one architect);
- Whether the Council can obtain better value for money through building properties

itself, or by continuing to work in partnership with housing associations, that construct new housing in large volumes; and

- Whether or not the Council has the financial capacity and the will to fund new house building, through the use of capital receipts (that currently provide significant investment income for the General Fund) and/or prudential borrowing.

The consultation period runs for 12 weeks, to the 17 April 2009.

Appendix 1

Date: Wednesday, 11 March 2009

Our Ref: HS/AMH/SH

Your Ref:

Mr P Wycherley
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Communities and Local Government
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SW1E 5DU

DRAFT

Mr Alan Hall (01992) 564004
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Dear Mr Wycherley

Consultation Paper - "Changes to the Revenue and Capital Rules for New Council Housing"

Thank you for inviting comments on the above Consultation Paper. I am replying on behalf of Epping Forest District Council, following consultation with the members of our Housing Scrutiny Panel and the Epping Forest Tenants and Leaseholders Federation.

I will first give my general comments on the Consultation Paper, followed by my responses to the specific questions raised in the Consultation Paper.

General Comments:

The Council welcomes the Government's proposals to change the revenue and capital rules for new council housing and believes that the proposals would remove the two major financial disincentives that currently exist, which discourage local authorities from building new affordable housing.

However, the Council is somewhat concerned that the Government has issued this Consultation Paper before publication of its anticipated proposals relating to housing subsidy and the Housing Revenue Account, with regard to the financing of existing housing stock owned by councils. Because of this, we believe that there is a danger of introducing a "two tier" approach to the financing of local government housing which, in the future, may be administratively cumbersome.

One of the concerns with regard to the proposals, which I know is often muted, relates to local authorities' ability to "gear up" once again to undertake new development. However, my Council takes the view that this should not be too difficult, since we believe that many local authorities will look to enter into Development Agreements with large registered social landlords (that already have the resources and expertise to undertake development). As you will appreciate, many such RSLs currently have capacity within their development departments, due to the reduced development activity being undertaken at the present time. However, to enable such a rapid response by local authorities to the proposals when introduced, it is essential that the final proposals confirm that:

- (a) Local authorities are able obtain funding from the Homes and Communities Agency (HCA) direct (after meeting the normal funding requirements of the HCA); and/or

- (b) Local authorities are able to secure funding from the HCA through existing strategic RSL Partners of the HCA, who would undertake developments and draw down the grant on behalf of the local authority.

If neither of the above two requirements are introduced, it will place local authorities at a severe disadvantage compared to RSLs, which in the opinion of my Council, will result in local authorities simply continuing to facilitate development by RSLs.

Although it is not explicitly stated within the Consultation Paper, it is assumed that the new housing provided by local authorities under the new proposed rules would be in respect of *social rented* housing. However, it is suggested that, if this assumption is correct, it should be explicitly stated within the final proposals.

A major concern of my Council is that, following the rule changes, this Council and other local authorities undertake new building, having regard to the removal of the two main disincentives, only to find that a future Government changes the rules again and introduces new rules requiring local authorities to contribute some of the income from the rents and/or capital receipts from sales, in the same way as the Government does now. You will appreciate that local authorities have witnessed many changes to legislation and regulations over the years that have placed them in a worse position than when they undertook the original initiative.

To overcome this concern, and to give greater confidence to local authorities to build once again, the Council suggests that formal legal agreements should be entered into between local authorities and either CLG or the HCA, which state clearly that the treatment of revenue income and capital receipts from new properties developed cannot be subsequently changed in respect of those properties.

Having provided the general comments above, I will now respond to the specific questions raised in the Consultation Paper.

Question 1: Given the objectives of the policy, what types of properties should qualify to be excluded from the HRA subsidy system and pooling requirements?

In addition to the three types of properties already suggested within the Consultation Paper, the Council would suggest a further two types:

- ❖ Properties that have proved to be difficult to let (by reference to some agreed criteria), e.g. sheltered bedsits, that are remodelled and/or converted to provided properties that are better fit for purpose. It is suggested that the inclusion of such a category would provide an incentive to local authorities to make better use of their stock and would help meet housing need. We feel that the existing proposal relating to "derelict or uninhabitable properties" does not currently cover such properties.
- ❖ Existing Council properties requiring major repair and improvement costing over a specified amount (e.g. £25,000). Such inclusion would encourage local authorities to invest money in their existing stock, to provide better quality accommodation and better meet housing need.

Question 2: In your view, what types of properties should not qualify to be held outside the HRA subsidy system and pooling requirements?

Whilst it is acknowledged that it would be inappropriate for the new proposals to cover properties being refurbished or remodelled at a modest cost, it is suggested that - for the reasons given above - properties requiring major refurbishment/remodelling should be covered by the new proposals. It is suggested that a minimum unit cost is introduced, say, £25,000 per property.

Question 3: Do you think that the proposed process for applying for a Section 80B exclusion is the right one to adopt? If not, what would be a better alternative?

We welcome the aim to minimise the burden of securing exclusions from the HRA subsidy system. The proposal that councils should apply for an exclusion for schemes, or bundles of schemes, rather than for individual properties, is particularly welcomed.

It would be sensible for applications to be made and assessed by the HCA, since they have already amassed experience of assessing proposed developments by RSLs.

Whilst it is accepted that it is important and good practice to undertake a robust options appraisal - to demonstrate that the option of the Council developing new housing itself offers the best value for money - it is important that the value for money gained by the proposal is viewed from the local authority's perspective and not, necessarily, from an overall public benefit perspective. For example, £2m spent by the Council to build new housing itself, offers better value for money to the Council than providing a grant to an RSL to develop. The former approach is more of an investment, that would produce rental revenue returns, whereas the latter has no financial benefit to the local authority. However, from a different perspective, other than from the Council's, it may be argued that there could be slightly better value for money from the perspective of the overall public purse, if the development is undertaken by an RSL.

It is acknowledged that only properties which conform to all Government policies regarding Council housing should be given an exclusion. Reference is made in the Consultation Paper to such policies including "rents" and "allocation policies". It is assumed that the former relates, primarily, to the Government's rent restructuring regime, and the latter, mainly, to the use of choice based letting schemes. It is suggested that reference to such Government policies are explicitly stated within the final proposals, so that local authorities are clear of the expectations.

I have explained above that it appears sensible for the HCA to assess submissions from local authorities. However, the Council would suggest that it would be much more efficient and streamlined if, rather than the actual consent being provided by the Secretary of State, that the Secretary of State delegates authority to the HCA to approve such submissions as well (in accordance with a clear-defined criteria set out by the Secretary of State).

Question 4: What factors should be taken into account by the Secretary of State in considering whether to enter into an agreement to exclude properties?

Generally, the proposed factors appear sensible, subject to the comments made above in response to Question 3.

However, reference to the proposed requirement that the Government must also consider the overall impact on Government fiscal policies, appears very vague. It is suggested that the criteria against which the Government will consider the impact on fiscal policies should be set out within the final proposals.

Question 5: What terms and conditions do you think should be included in exclusion agreements?

One of my general comments set out above on the proposals refers to a need for the Government to provide a legal commitment to the fact that the exclusion to the rules will apply to the newly developed properties in perpetuity. It is suggested that such a commitment should be included within the terms and conditions.

It is also suggested that the local authorities should be legally bound to meet the commitments that it sets out in its application for an exclusion.

Question 6: Do you agree that properties excluded from the HRA subsidy system under Section 80B should also be exempted from the requirements to pool capital receipts?

It is considered absolutely essential that properties excluded from the HRA subsidy system are also exempted from the requirements to pool capital receipts.

Question 7: Do you agree with the proposed conditions attached to the exemption from pooling, which require receipts to be used for affordable housing and regeneration?

It is suggested that capital receipts obtained from the sale of properties covered by the exclusions should only be used for:

- (a) repayment of debt (perhaps from a loan taken out to build the properties in the first place); or
- (b) affordable housing.

It is suggested that reference to capital receipts also being able to be used for "regeneration" is far too wide, and could result in such capital receipts being used for regeneration schemes that have no element of affordable housing. It is my Council's view that, since the exclusions have been introduced to increase the level of affordable housing provision, the subsequent use of capital receipts resulting from the sale of such properties should also only be used for the provision of additional affordable housing (or to repay debt). This would mean that such capital receipts would have to be recycled to reprovide the affordable housing that would have been lost through the sale of these affordable properties.

I hope that you find the above comments of assistance. My Council looks forward to the final proposals being published as quickly as possible after the closing date for consultation, to enable local authorities to start building council housing once again, as quickly as possible.

I have sent a copy of this letter to the LGA for their information.

If you have any queries concerning any of the comments made in this letter please do not hesitate to contact either myself or the Council's Director of Housing, Alan Hall.

Yours sincerely

Councillor David Stallan
Housing Portfolio Holder



Changes to the revenue and capital rules for
new council housing

**Consultation on excluding new council housing from
Housing Revenue Account Subsidy and Pooling**

January 2009

Department for Communities and Local Government

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Summary

Topic of this consultation	Proposals for removing revenue and capital disincentives to local authority investment in new council housing.
Geographical scope	England.
Impact Assessment	An assessment of the impact of excluding new council properties from the HRA subsidy system was published with the Housing and Regeneration Bill. It is available at: http://www.communities.gov.uk/housing/publications/impact-assessments
To	All those with an interest in social housing, particularly local authorities, housing organisations and tenants' organisations.
Body/bodies responsible for the consultation	Communities and Local Government.
Duration	Responses should be submitted by 17 April 2009.
Enquiries	Peter Wycherley, Communities and Local Government, 020 7944 3468
How to respond	<p>Responses should be submitted either electronically via email or by post to the address below. It would be helpful if all responses can be annotated with the relevant question number or section to which the comment relates.</p> <p>Peter Wycherley Decent Homes and Housing Finance Division Communities and Local Government First Floor Eland House Bressenden Place London SW1E 5DU Email: LAnewbuild@communities.gsi.gov.uk</p>
Compliance with the Code of Practice on Consultation	This consultation complies with the Code of Practice.

Purpose of this consultation

We want local authorities to play a bigger role in securing the supply of new affordable housing. This should include new opportunities for councils to develop housing directly where this offers value for money in comparison with other options.

The purpose of this document is to set out our proposals for removing some disincentives to local authority investment in new council housing within the current financial framework. These include changes to both revenue and capital rules.

At present, the council housing finance system redistributes the revenue (through Housing Revenue Account Subsidy (HRAS)) and capital returns (through pooling) from new and existing housing on the same basis. Neither pooling nor the HRAS distinguishes between homes which were built in the past with a large element of central Government financial support and new homes, which represent a largely local investment.

In July 2007, the Housing green paper, *Homes for the future, more affordable, more sustainable*¹, said that “Where councils choose to invest their own money in new [housing] supply, we think they should be able to keep the income and capital returns from those additional homes.”

The changes to the treatment of income from new homes can now be made using powers in section 80B of the Local Government and Housing Act 1989, which was inserted by section 313 of the Housing and Regeneration Act 2008². This provides for exclusions of specified properties or descriptions of property, including future properties, from the HRA subsidy system. This would in effect make the properties invisible to the subsidy system whilst leaving them within the Housing Revenue Account.

In taking the provisions through Parliament, we said we intended to use the powers to exclude newly-built or newly acquired dwellings.

The changes to the rules which apply to capital receipts can be made by secondary legislation. This document also seeks views on draft regulations which would achieve this. Our intention is to link the two changes, so that the new capital receipt regulations would apply automatically to properties covered by an exclusion from the HRA subsidy system made under section 80B of the Local Government and Housing Act 1989.

Taken together, these changes would remove two major financial disincentives to local authority investment in new housing. This consultation document sets out how we propose to make these changes and seeks views.

¹ *Homes for the future – more affordable, more sustainable* – Housing Green Paper – <http://www.communities.gov.uk/publications/housing/homesforfuture>

² Housing and Regeneration Act 2008 – http://www.opsi.gov.uk/acts/acts2008/ukpga_20080017_en_1

We welcome comments on any aspects of these proposals. In particular, we invite respondents to comment on some or all of the seven questions in bold in the boxes below.

Who are we consulting?

We welcome comments from everyone, and in particular from local authorities, housing organisations and tenants' organisations.

The consultation period runs for 12 weeks to 17 April 2009.

This consultation is being run by Communities and Local Government and applies to England only.

About this consultation

This consultation document and consultation process have been planned to adhere to the Code of Practice on Consultation issued by the Department for Business Enterprise and Regulatory Reform.

Representative groups are asked to give a summary of the people and organisations they represent and, where relevant, who else they have consulted in reaching their conclusions when they respond.

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department.

The Department for Communities and Local Government will process your personal data in accordance with DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties. Individual responses will not be acknowledged unless specifically requested.

Your opinions are valuable to us. Thank you for taking the time to read this document and respond.

If you have any observations about how we can improve the process please contact:

The Communities and Local Government Consultation Co-ordinator
Zone 6/H10
Eland House
London SW1E 5 DU

or by e-mail to: consultationcoordinator@communities.gsi.gov.uk

How to respond to the consultation

Consultation responses should be submitted either electronically via email or by post to the address below, by 17 April 2009. It would be helpful if all responses can be annotated with the relevant question number or section to which the comment relates.

Peter Wycherley
Decent Homes and Housing Finance Division
Communities and Local Government
First Floor
Eland House
Bressenden Place
London SW1E 5DU

email: LAnewbuild@communities.gsi.gov.uk

It would be helpful if you could make clear in your response whether you represent an organisation or group, and in what capacity you are responding.

The provisions in section 80B of the Local Government and Housing Act 1989

Section 80B of the Local Government and Housing Act 1989 (as inserted by Section 313 of the Housing and Regeneration Act 2008) provides for agreements between the Secretary of State and a local authority which would have the effect of excluding either a local authority's whole housing stock or specified properties (including future properties) from the operation of the Housing Revenue Account subsidy system.

Agreements under this section would not have any impact on the operation of the Housing Revenue Account itself. The rules requiring councils to maintain a ring-fenced landlord account – the Housing Revenue Account – would continue, and the homes excluded from the subsidy system would remain within the Housing Revenue Account.

The effect of the proposed changes

The HRA subsidy system is a 'notional' system, based on assumptions in national formulae about what each council needs to spend and what income it should raise from rents. Notional surpluses generated in some authorities are used to meet notional shortfalls in others.

The subsidy formulae include allowances to meet the cost of financing prescribed kinds of debt within the Housing Revenue Account. However, no provision is made within these formulae for financing the capital costs of new council housing (other than through PFI).

As a result, if a local authority builds or acquires a new dwelling, the allowances for that council increase only by the running costs associated with the new property – principally the allowances for management, maintenance and major repairs. If, as is likely with newly-built dwellings, the assumed rental income for those properties exceeds the assumed need to spend as prescribed by these allowances, the difference is deemed to be a surplus. Where such surpluses accumulate across an authority's Housing Revenue Account there will be an equivalent reduction in net subsidy, even where the council's subsidy position as a whole is in deficit.

If the provisions were used to exclude new council homes from the HRA subsidy system, this would increase a council's retained rental income by the difference in the subsidy formulae between the allowances and the assumed rents for those properties.

The impact of the provisions would depend on the allowances that a particular property attracts and its guideline rent. In aggregate nationally, management, maintenance and major repairs allowances are equivalent to around 72 per cent of assumed rental income this year. (Most of the remainder is used to meet the costs of servicing HRA debt.) For a dwelling with a similar profile of rent and allowances, the provisions would therefore allow the council to retain the remaining 28 per cent of assumed rent from each new home.

The value to a council of the provisions would be the same, whether or not it sets the actual rent in line with the notional rent used in the HRA subsidy formulae. It would also be the same regardless of whether a council was a net contributor or beneficiary of the HRA subsidy system.

Properties to be covered by the agreements

New build within the HRA is the most likely source of new supply. However, we propose that section 80B agreements should also be offered for some other properties acquired by councils for social rent within the HRA.

We propose that the following types of properties should qualify to be held outside of the HRA subsidy system:

- new build properties
- properties purchased or otherwise acquired
- derelict or uninhabitable properties brought back into use as a result of significant council investment

The intention is to allow a council to retain the return from its own investment in new housing. This is why we propose that the exclusions should cover properties which have required a large local investment to bring back into use. For the same reason we think that the following types of properties should not qualify for exclusion from the subsidy system:

- properties which are temporarily vacated to allow refurbishment or remodelling work to take place
- properties which are vacant whilst awaiting minor works to make them suitable for occupation
- social housing transferred from one social landlord to another.

QUESTION 1: Given the objectives of the policy, what types of properties should qualify to be excluded from the HRA subsidy system and pooling requirements?

QUESTION 2: In your view, what types of properties should not qualify to be held outside the HRA subsidy system and pooling requirements?

The process for securing a section 80B agreement

We aim to minimise the burden of securing an exclusion from the HRA subsidy system as far as possible, commensurate with ensuring the powers are used properly and effectively. We therefore propose that councils should apply for an exclusion for schemes or bundles of schemes, wherever possible, rather than for individual properties. Where authorities acquire properties one by one or a few at a time, we propose that they bundle them together when seeking a section 80B agreement.

As schemes are subject to change up to delivery, we also propose that agreements allow for a reasonable level of variation in delivery, for example in the number and types of properties to be covered and the timing of starts and completions. We would not however expect to enter into agreements based on early speculative outlines of schemes; applications should contain sufficient information about the properties to establish that they will meet the criteria for exclusion.

We propose that a letter from the Secretary of State agreeing to an exclusion is short and as standardised as far as possible, referring to detail in the application as the basis for the terms and extent of the exclusion.

Criteria against which an application would be considered

How a local authority chooses to invest its own resources is essentially a local matter. However, in granting an exclusion from the HRA subsidy system, we would expect to see evidence that appropriate local decision-making processes have been applied, including a robust options appraisal, and that the option chosen offered value for money.

The powers in the Act provide for agreements to contain terms and conditions. We propose that applications should include details about the scheme, including design and quality standards, rents and allocations policies. We would only expect to exclude properties which conform to all Government policies regarding council housing, including rents and allocations policies, and would expect the application to include such commitments.

In considering whether to enter into agreements to exclude council properties from the HRA subsidy system, Government must also consider the overall impact on government's fiscal policies. Local authority spending and borrowing are part of overall public expenditure. Increases in spending and borrowing made possible by exclusions must therefore be affordable within national as well as local spending plans and policies.

We propose to ask the Homes and Communities Agency to review all applications for a section 80B agreement, and to advise the Secretary of State as to whether applications meet the criteria for exclusion. Decisions will be made by the Secretary of State.

QUESTION 3: Do you think that that the proposed process for applying for a section 80B exclusion is the right one to adopt? If not, what would be a better alternative?

QUESTION 4: What factors should be taken into account by the Secretary of State in considering whether to enter into an agreement to exclude properties?

QUESTION 5: What terms and conditions do you think should be included in exclusion agreements?

Rules on capital receipts

The 2007 Housing green paper, *Homes for the future: more affordable, more sustainable*, also proposed that councils should keep the full capital receipt of new build properties subsequently sold under Right to Buy. At present, 75 per cent of those net receipts are paid to Government and pooled centrally. This figure was set roughly to reflect the historic split between national and local investment in council housing.

This is perceived as unfair for new local authority properties which are financed wholly locally. A council currently risks losing most of its own capital investment if a tenant exercises their statutory Right to Buy, but would of course still retain the debt associated with the investment.

We are therefore also seeking views on proposed changes to the *Local Government (Capital Finance and Accounting) (England) Regulations 2003*. These changes would allow councils to retain all of the receipts from a subsequent sale of a property covered by an exclusion from the HRA subsidy system made under section 80B, provided that the receipts were used for affordable housing and regeneration projects. This would effectively extend the existing provision for receipts arising from the sale of vacant housing land and other housing assets that are not dwellings.

A draft of the Regulation is attached at the end of this document.

QUESTION 6: Do you agree that properties excluded from the HRA subsidy system under section 80B should also be exempted from the requirements to pool capital receipts?

QUESTION 7: Do you agree with the proposed conditions attached to the exemption from pooling, which require receipts to be used for affordable housing and regeneration?

Impact assessment

An assessment of the impact of excluding new council properties from the HRA subsidy system was published with the Housing and Regeneration Bill. It is available at the following link (see pages 56 – 66 of the Housing and Regeneration Act Impact Assessment document):

<http://www.communities.gov.uk/housing/publications/impact-assessments>

Reason for decision:

Options considered and rejected:

Consultation undertaken:

Resource implications:

Budget provision:

Personnel:

Land:

Community Plan/BVPP reference:

Relevant statutory powers:

Background papers:

Environmental/Human Rights Act/Crime and Disorder Act Implications:

Key Decision reference: (if required)