Autumn Statement Submission 2016

About ARCH and the NFA

165 councils in England own over 1.6 million homes, either managing them directly or through Arms Length Management Organisations. ARCH represents councils that have chosen to retain ownership of council housing and manage it directly. The National Federation of ALMOs represents 37 Arms Length Management Organisations managing over 500,000 homes in 40 local authorities. Together we represent over 1.2 million council homes, one third of the social housing in England.

Executive Summary

ARCH and the NFA welcome the Government's renewed commitment to 1 million new homes by 2020. The councils and ALMOs we represent are keen to help realise this ambition, and we believe that, given the right help, they could make a major contribution. Specifically, we ask that the Government should:

- encourage and support councils to supply homes for sale and market rent, not only traditional council housing;
- reconsider social rent reduction plans and debt caps to enable councils to finance much more new building from their HRAs;
- make sure that agreements to replace council higher-value homes give councils the resources and flexibility to deliver at least one-for-one replacement (two-for-one in London).

Reaching a million new homes by 2020 means nearly doubling current output over the next three years. This cannot be left to private developers alone, but can only be achieved by increasing investment by councils and housing associations as well as encouraging new entrants to the market – in particular more small and medium-sized housebuilders. Further it requires action to increase the number of skilled building workers and the capacity of the building materials industry.

Some councils are already intervening in local housing markets to stimulate an improved supply of homes for sale and market rent, to nurture and support local builders and the supply of skilled labour. With Government encouragement and support they could do much more and many more councils would be likely to follow their example. We would argue that the Government should agree to fund and support the establishment of a resource to help councils do more by providing advice and enable them to share experience and develop skills.

Councils with housing, such as those ARCH and the NFA represent, have the additional advantage of an asset base of 1.6 million homes yielding an annual income of £9.5 billion which can be used to underpin the development of new homes. One of the objectives of HRA self-financing introduced in April 2012 was to enable them to plan long-term investment, including in new housebuilding. Until the imposition of the four-year social rent cuts they were planning to provide around 5,000 new homes a year without external subsidy, with the financial capacity to increase this to around 20,000 a year if HRA debt caps were lifted. We would argue that, if the Government wants councils and housing associations to make their full potential contribution to increasing housing supply, it should reconsider whether to continue with the remaining three years of the planned social rent reductions and, at the very least, make an early announcement setting out a new ten year social rent policy to enable local authorities and housing associations to build robust business plans. We consider that the short-term increase in welfare expenditure this would imply would be more than compensated in the long term by the benefits generated by the additional new housing supply it would facilitate.

There are several provisions of the Housing and Planning Act 2016 where the detailed approach to implementation, yet to be specified in secondary legislation, could do much to help – or hinder – councils' potential contribution to increasing housing supply.

Regulations under Part 1 (Starter Homes) provide the opportunity to allow local flexibility over housing mix on new developments to ensure local housing markets work for all.

ARCH and NFA have never supported the proposal for a levy on HRA assets to pay for RTB discounts for housing associations. However, given that the Act has been passed, the key issue making the most effective use of the levy to fund the provision of additional new housing by both councils and housing associations. We want to ensure that the greatest possible number of councils reach agreements with the Secretary of State to replace the higher value homes they may sell to fund levy payments and, equally importantly, to maximize the probability that these agreements will deliver on Government's promise of at least one-for-one replacement (two-for-one in London) with additional homes.

The need to develop a framework for HVAS replacement agreements provides the opportunity to review and learn from the operation of the RTB replacement agreement introduced in 2012, which is not working as intended. Many councils have significant on-going plans for housing investment across all tenures, and we think the Government should encourage and enable them to do more. HVAS replacement agreements should not be seen as separate agreements each funding stand-alone development programmes but, wherever appropriate, as agreements specifying how HVAS receipts will be deployed to supplement and extend existing plans. The same should apply to a revised RTB replacement agreement. Preferably, we would like to see a single agreement covering both RTB and HVAS replacements.

A New Plan for New Circumstances

ARCH and the NFA welcome and applaud the Prime Minister's commitment to step in and tackle the dysfunctional housing market, as part of a new package of prudent public investment in infrastructure. We would argue that housing investment should be given a high priority in this package. The chronic under-supply of housing in many areas of the UK is a significant economic weakness that urgently needs tackling, and, compared with alternative infrastructure investment opportunities, such as transport infrastructure, housing investment has the advantage of being quicker to show results and less reliant on imported goods and services that the falling pound has made more expensive.

We have always supported the Government's ambition of a million new homes by 2020 and we welcome the new administration's renewed commitment to achieving it. We argue it should be the start of a longer-term commitment to increase the annual rate of new home construction to at least 250,000 to match the expected increase in the number of households and help make home ownership affordable for all who aspire to it. As the Barker Review noted over a decade ago, because newly constructed homes form only a fraction of supply this increased level of output needs to continue for a sustained period – and to be expected to do so - to apply significant downward pressure on house prices and bring house purchase back within the reach of the majority of households[1].

The scale of the challenge should not be underestimated. The annual rate of new home completions has not been above 200,000 for a sustained period since the 1970s; for the last 30 years it has averaged less than 150,000 a year. And, although completions in 2015/16, at 139,650, were significantly better than the recession trough of 107,870 in 2010/11, achieving 1 million new homes by 2020 involves nearly doubling this rate of output in the next three years.

Since output was last above 200,000 a year there have been substantial changes in the supply side of the housebuilding market. In the 1960s and 1970s roughly half of new housing was provided by councils; since then, council housebuilding has fallen to very low levels, except for a slight resurgence over the last 5 years. This loss has not been compensated by an equivalent increase in housing association development activity which, since 1985 has ranged between 13,000 and 32,000 homes a year. The private housebuilding market has changed too, with the loss of a large number of small and medium size firms since the 1980s, leaving a small number of volume housebuilders much more dominant in the market.

We do not wish to take sides in the argument whether or not the volume builders' business model relies on land-banking and managed under-supply to keep house prices high. Regardless of the truth of this proposition, the industry lacks the capacity to deliver the necessary increase in output, and we need to enable and encourage new entrants – principally small and medium sized enterprises – to the market. Councils can do a lot to help achieve this.

Nor is this the time to revisit the argument whether councils or housing associations should be the main providers of new affordable housing. The Government should be looking to both to increase their contribution to new development. In areas where council housing has been transferred to a housing association it will normally be for the association to take the lead in new development. In other areas, such as those which the ARCH and NFA represent, it makes

[1] Kate Barker *Review of Housing Supply: Delivering Stability, Securing our Future Housing, Needs,* March 2004 http://news.bbc.co.uk/nol/shared/bsp/hi/pdfs/17_03_04_barker_review.pdf

sense for councils to lead delivery underpinned by the asset base provided by their existing stock – a total of 1.6 million homes yielding a rental stream of £9.5 billion a year. Further, in many of these areas, housing associations are not, and have never been, very active. As the Housing Finance Institute report *From the Shores to the Shires* points out, housing associations built no homes at all last year in 18% of local authority areas, of which 90% are outside London and the Metropolitan areas, yet combine high levels of need and significant development opportunities[2].

Councils can do more as enablers, but also providers

In his speech to the National Housing Federation conference, the Minister for Housing, Gavin Barwell, rightly rejected simplistic attempts to place blame for under-supply either on council planning delays and obstructions or the failure of developers to act speedily on the planning permissions they have been granted[3]. Both arguments are based on the false premise that councils should play an essentially passive role in new housing delivery, primarily responding to initiatives taken by private developers. In fact many councils are already playing a much more active role in stimulating and nurturing private investment in new homes for sale and market rent, or, in some cases, stepping in where private developers, for whatever reason, hold back. With encouragement and support from Government, we believe they could do much more.

Given the current statutory framework for local government such interventions are implemented through a mix of delivery options including the establishment of local housing companies in which the local authority has influence or control, or by re-tasking ALMOs where these already exist. Examples of which we are aware include:

- Purchase of undeveloped land or stalled development sites in which there is little private sector interest to kick-start development for sale or market rent (e.g. Thurrock, Sheffield, Stockport Homes)
- Local authority commissioning of new construction across all tenures to ensure improved standards of design or construction (e.g. Thurrock, Nottingham City Homes)
- Acquisition or development of homes to increase supply and/or quality of market rented homes (e.g. South Cambridgeshire, Lewisham Homes) or to rebalance the mix of homes for sale and market rent in parts of the local authority area (e.g. Lincoln)
- Nurturing of local small builders through local authority commissioning and agreements with private developers on using a proportion of local labour and providing apprenticeships;
- Building skills development and training (Nottingham City Homes)

We think these are all examples of local authority intervention that is desirable and should be explicitly welcomed and encouraged by the Government. We are aware that many more councils are keen to become more active in some or all of these areas and are currently considering what action to take. We would argue that the Government should agree to fund and support the establishment of a resource to help councils do more by providing advice and enable them to share experience and develop skills.

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[2] Housing & Finance Institute, *From the Shores to the Shires; Regional Local Councils, Big Housing Opportunities,* October 2016 http://thehfi.com/wp-content/uploads/2016/09/From-the-Shores-to-the-Shires-publication-version-F2.pdf

[3] https://www.gov.uk/government/speeches/national-housing-federation-september-2016

The Case for More New Homes at Genuinely Affordable Rents

We welcome the new Government's shift in emphasis away from an excessively narrow focus on the construction of new homes for sale to a more balanced programme of homes for rent and sale. This programme needs to include a proportion of affordable homes for sale and shared ownership, plus a significant proportion of homes at genuinely affordable rents.

To examine the case for building more homes at genuinely affordable rents ARCH and the NFA joined with SHOUT and others to commission independent analysis by Capital Economics of the impact of building 100,000 new affordable rented homes a year. The analysis was published in June 2015 as *Building New Social Rent Homes: an Economic Appraisal,* followed by an update published earlier this month re-evaluating the analysis in the light of the European referendum result.[4] The findings of this analysis are described in greater detail in SHOUT's Autumn Statement submission.[5] From our perspective the key conclusions are that expansion of the development programmes of councils and housing associations on that scale would:

- offer a pathway out of expensive and insecure private renting, and on towards ownership – in part via the Right to Buy – for those hardworking households who are "just managing";
- over time, reduce the cost to government of meeting the housing needs of low-income households;
- make a major contribution to the Government's ambition of 1 million new homes by 2020 and address the chronic undersupply of housing in the UK;
- help address pressure on public services, notably health and social care, driven by poor housing conditions.

100,000 new homes was chosen as an indicative figure in line with national data on household incomes, housing needs and affordability to illustrate the impact on the national housing shortage and public finances. We do not envisage that every area needs the same proportions of new homes for sale, market and affordable rent. We believe that local authorities, in line with their strategic housing responsibilities, should be charged with determining, in consultation with local people, the appropriate mix of new development to meet identified and expected local housing needs, and with ensuring its delivery through their planning, enabling and commissioning powers.

Nor do we offer a prescription on the national balance between the numbers of homes to be provided by councils and by housing associations, although we envisage that councils should play a much bigger role in direct development than in the last three decades. One of the objectives of the introduction of HRA self-financing in April 2012 was to allow councils to plan for long-term investment including the provision of new homes. Since then, many councils with housing have restarted house building programmes, albeit on a relatively small scale. ALMOs have also built a total of 905 new homes by 2015. As former Housing Minister Brandon Lewis reminded the CIH Conference this year, more new council homes have been completed since 2010 than in any comparable period since the early 1990s.

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[4] Capital Economics for SHOUT and the NFA *Building New Social Rent Homes - An Economic Appraisal,* 26 August 2015; *Building New Social Rent Homes 2016 Update*d**,** 2 October 2016 http://www.almos.org.uk/news_docs.php?page=1&subtypeid=24

[5] SHOUT, *Autumn Statement Submission 2016*, October 2016

Research led by ARCH in 2012 showed that councils were planning to build around 25,000 new HRA homes a year by 2018, and had the financial capacity from HRA resources alone to build 60,000 if HRA debt caps were lifted. In 2014, LGA research reported council plans to build 28,000 homes by 2020, with the potential to increase this number to 76,000 if borrowing restrictions were removed[6]. These plans were already adversely affected under the last Government by the 2013 decision to change the inflation assumption underlying permissible rent increases. This has been compounded by the rent reductions imposed by the Welfare Reform and Work Act; uncertainty about the Government's social rents policy after 2020 adds to the problem by undermining long-term investment planning.

The CIH/CIPFA report *Investing in Council Housing* estimates that the original self-financing model showed potential capacity for councils to build more than 550,000 units over 30 years.[7] After taking into account the change in the inflation assumption, this capacity for building new units reduced to 160,000 (or 28% of the capacity at the time of the settlement). The effects of rent reduction mean that the capacity to build drops further to just 45,000 units (or 8% of the capacity at the time of the settlement). These findings are confirmed by survey responses from individual councils and ALMOs.

We would argue that, if the Government wants councils and housing associations to make their full potential contribution to increasing housing supply, it should reconsider whether to continue with the remaining three years of the planned social rent reductions and, at the very least, make an early announcement setting out a new ten year social rent policy to enable local authorities and housing associations to build robust business plans. We consider that the short-term increase in welfare expenditure this would imply would be more than compensated in the long term by the benefits generated by the additional new housing supply it would facilitate.

In this submission we have made the case for a very substantial increase in council-led housing development. We are not, however, arguing that councils should build only traditional council houses and certainly not for a return to the construction of large scale council housing estates similar to those built in the 1970s. Just as we expect councils to implement housing strategies to ensure the construction, by a variety of providers, of an appropriate mix of new homes across their areas, we would expect council-led developments typically to include a mix of homes for sale and rent, with a significant proportion of genuinely affordable housing. Mixed tenure developments have been the norm for some years where new affordable housing has been provided through s106 powers, and on many schemes for regenerating large-scale council estates. We do not see this changing.

Some examples of current council and ALMO housebuilding schemes are included in the Appendix to this submission.

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[6] Details of both research studies are included in *Investing in Council Housing,* see next footnote.

[7] CIPFA/CIH, *Investing in Council Housing*, July 2016
http://www.cih.org/resources/PDF/Investing%20in%20council%20housing%20CIH-CIPFA%20July%202016.pdf

Implementation of the Housing and Planning Act 2016

There are several provisions of the Housing and Planning Act 2016 where the detailed approach to implementation, yet to be specified in secondary legislation, could do much to help – or hinder – councils' potential contribution to increasing housing supply.

Regulations under Part1 (Starter Homes) provide the opportunity to allow local flexibility over housing mix on new developments, as argued for above, to ensure local housing markets work for all.

ARCH and NFA have never supported the proposal for a levy on HRA assets to pay for RTB discounts for housing associations. Right to Buy was introduced for council tenants without any form of reimbursement for discounts from central government. Councils, and council tenants, were expected to absorb and manage the impact on HRAs without central government help. It is doubly unfair that they should now be expected to pay for extension of the policy to housing association tenants. However, given that the Act has been passed, the key issue is now replacement of the homes sold both by housing associations and councils, or, more accurately, making the most effective use of the levy to fund the provision of additional new housing by both councils and housing associations.

The Conservative Manifesto did not just commit the Government to extend the Right to Buy to housing association tenants; it also committed to replace the homes sold by both the housing associations and councils affected. Without this proviso the policy would be hard to justify as a fair or sensible use of public resources – why single out housing association tenants to receive so much higher levels of help into home ownership than other groups of first time buyers often stuck in the private rented sector. The value-for-money case for the policy hangs on its contribution to boosting housing supply and helping meet the million homes target. That makes it essential to ensure that the greatest possible number of councils reach agreements with the Secretary of State to replace the higher value homes they may sell to fund levy payments and, equally importantly, to maximize the probability that these agreements will deliver on Government's promise of at least one-for-one replacement (two-for-one in London) with additional homes.

In developing our views on the appropriate approach to replacement agreements under section 74 of the Act, we have started by looking at the closest current parallel, the 2012 agreement on replacement of homes sold under Right to Buy. This has the following features:

- It is a "one-size-fits-all" agreement applicable to all regions and authorities;
- Receipts must be used within three years or returned with punitive interest;
- Receipts cannot be used to fund more than 30% of scheme expenditure incurred during the 3 year period;
- Local authorities cannot contribute to scheme costs beyond 30% from other resources (e.g. free land);
- Receipts cannot be given to an ALMO or other local authority company;
- The policy aim is one-for-one replacement nationally, not in individual local authority areas.

There are important lessons to be learned from the operation of these agreements; unfortunately these are mostly negative. As the National Audit Office warned in March this year, the current agreement risks failing to deliver one-for-one replacement, even at a national level unless the number of replacement homes started increases fourfold in the current year. Some authorities have found the terms of the RTB agreement so restrictive that they have been unable to use their receipts within the 3-year period, and been forced to return them. While they have been penalized with interest payments, so that the Exchequer is, in theory, no worse off, the result is that resources intended to support housing investment have lain idle for three years at a time of acute housing shortage. With the new agreements, and in the context of renewed efforts to meet the million homes ambition, deliverability should be a primary consideration.

RTB receipts are arguably too erratic and unpredictable, and often too small, to support a stand-alone replacement programme. There is some evidence to suggest that councils which have successfully made use of RTB receipts have been those with ongoing new build programmes funded from a variety of sources, to which RTB receipts can be applied as and when they arise. The restriction in the RTB agreement on contributing from other resources makes this approach unnecessarily hard to implement.

Many councils have significant ongoing plans for housing investment across all tenures, and, as we have argued above, we think the Government should encourage and enable them to do more. HVAS replacement agreements should not be seen as separate agreements funding stand-alone development programmes but, wherever appropriate, as agreements specifying how HVAS receipts will be deployed to supplement and extend existing plans. The same should apply to a revised RTB replacement agreement. Preferably, we would like to see a single agreement covering both RTB and HVAS replacement. Clearly, Government will want to be satisfied that RTB and HVAS receipts are not simply substituted for other resources available to the local authority, and that public resources deliver the maximum value for money, but this should not require a rigid separation of HVAS or RTB-funded programmes from other development programmes.

The RTB replacement agreement adopts a one-size fits all approach limiting the use of receipts to 30% of development costs in all areas regardless of local variations in either these costs or average RTB receipts per unit. The Government defended this approach by insisting that the objective of one-for-one replacement was an overall target to be achieved nationally, not in each local area. With HVAS agreements the objective is different. Each agreement is intended to secure the objective of at least one-for-one replacement of sold homes and, in London, at least two-for-one replacement. While there is no requirement that replacement homes are provided within the area of the authority entering into the agreement – Ministers were insistent in the House of Lords that councils should have flexibility on location – there is at least a clear implication that the replacement dwellings should be contributing to housing need in that authority, and therefore be accessible and attractive to households in need from that authority and, normally, located reasonably close to it. The implication is that agreements will need to have regard to local development opportunities and costs and thus be subject to variation from area to area. A one-size-fits all approach is not appropriate. This need not imply that DCLG would have to negotiate up to 165 individual agreements – a challenging prospect. ARCH and the NFA would would be keen to work with DCLG to develop a framework that would provide the necessary flexibility without the need for too much individual tailoring authority by authority.

Another reason why councils have found the RTB agreement hard to implement is that circumstances have changed significantly since it was introduced in 2012. The maximum 30% contribution from receipts was set, as we recall, by deducting from estimated average unit development costs the amount of borrowing that could be repaid from the assumed yield of an average affordable rent over a 30 year period. At that time the policy assumption was that affordable rents would rise by RPI plus 0.5 per cent annually. Since 2012 there have been two major changes in Government social rent policy, both of which have made the 30% limit more unrealistic. Yet the bar on local contributions from other resources has made it much more difficult for authorities to compensate for the impact of these policy changes. We have seen an estimate that suggests that, on current rent policies, an average contribution of 45% to 50% would now be appropriate. We recognise that HVAS replacement agreements will not be confined to the provision of housing for social or affordable rent, but the more general point still applies that agreements must be flexible enough to accommodate unforeseen changes in circumstances or in Government policy, particularly given the fact that agreements are likely to cover schemes lasting five or more years.

The Act provides that replacement homes should be “affordable” in a very broad sense that includes homes for sale at a discount, for shared ownership and for sub-market rent. Each of these has a different impact on public expenditure, compounded by variation in the costs of provision between different areas.

On the assumption that HVS replacement agreements allow for only a percentage of replacement costs to be rebated from the levy, the balance will be financed initially from a net increase in local authority borrowing. This may be relatively short term, to cover the development period, for example where the replacement dwellings are to be sold as starter homes, or longer term, where the replacement dwellings are provided for social or affordable rent. Shared ownership dwellings occupy an intermediate position because an initial share of at least 25% will be sold and the expectation is that many shared owners will staircase over time to full ownership. Genuinely affordable rented housing, other things equal, is likely to have the greatest and longest-term impact on public borrowing albeit one that is matched by an ongoing rental stream. This creates a temptation, in negotiating an agreement in any area, to increase the proportion of homes for sale and shared ownership in order to maximize the number of homes provided with a given amount, and the volume and duration of any necessary increase in public borrowing. This is a temptation that should be firmly rejected. The overriding objective should be to deliver the mix that best meets housing need in the relevant area.

Some authorities may be able to accommodate the additional borrowing within existing balances or borrowing limits. Others may not without breaching their debt caps. Some new flexibility over debt caps will almost certainly be necessary to enable replacement agreements to delivered in some areas. We would also argue that the framework for agreements should allow for flexibility on future rent levels in specific cases. This might include allowing authorities to migrate new tenancies from social rents closer to affordable rent levels.

Appendix: Case Studies

Case Study 1: Shropshire Towns and Rural Housing

STAR Housing programme consists of 15 different HRA sites and 66 units. The majority of the sites are former garage sites that had fallen into disuse. The largest site had a number of hard to let flats and maisonettes that also would have required a substantial amount of investment to meet the Decent Homes standard. This site was cleared of the existing properties and is now being redeveloped as family homes.

As well as family units STAR Housing is also developing one of the new homes in conjunction with a local charity, Transhouse. They are a registered charity providing support for people with spinal cord injuries. They are leasing this adapted property from STAR Housing on a 10 year agreement. This gives them continuity in their delivery of service for their clients whilst also ensuring that STAR Housing receives a guaranteed income.

The programme has a mix of tenures and property sizes to suit local requirements. There are 37 units for affordable rent and the remaining 25 units are shared ownership. Not only did this ensure the viability of the programme it also provides targeted solutions that meet the needs of the local community. By linking these sites together rather than developing them individually STAR Housing has been able to take advantage of the economies of scale that this larger procurement exercise brings.

Case Study 2: Palmer Court, Nottingham City Homes

Palmer Court, in Lenton, comprises 54 independent living flats and communal facilities. Built on behalf of NCH and Nottingham City Council by community regeneration specialists, Keepmoat, these energy efficient homes have replaced inefficient, no longer fit for purpose flats in nearby Newgate Court. It forms the first phase of a three-year £14million wider scheme to regenerate this area of Lenton, by providing a range of accommodation in a new neighbourhood.

This development set out to address the future needs of the ageing population through good quality homes for older people. Palmer Court was designed and built with residents in mind, providing a supportive, communal environment in which they can comfortably live. Built to Code for Sustainable Homes Level 4 reduces running costs for tenants, helping combat fuel poverty, with an estimated saving of up to £300 per year.

The development has already created employment, training and work experience opportunities for a large number of local people, and this is set to continue as the next phases of the project continue. 13 new apprenticeships and 18 work experience placements for local people have been created. In addition the Keepmoat Team took part in the Prince's Trust 'Get into Construction' programme, with Jobcentre Plus which aims to help young unemployed people gain work experience and improve their employability skills through CV workshops, mock interviews and work placements. The site has also hosted eight visits and Q&A sessions from local schools, colleges and universities.

NCH worked closely with Keepmoat to ensure that local labour targets were achieved and supply chain partners were selected within the local area in order to reduce the carbon footprint of projects. As a result local labour on-site was 52%, with 41% from within Nottingham City Limits. Picture depicts Palmer Court Keepmoat Apprentices.

Case Study 4: Atlas Mews, Lewisham

In March 2015, Lewisham Homes welcomed six new families into the first council housing built in the borough for 30 years.

Case Study 5: North Kesteven

Over the last 5 years, North Kesteven District Council has built over 100 new council homes in the HRA. However, demand for housing remains high, as the district is one of the fastest-growing areas in the country, and in 2015 the council decided to establish a company to provide housing outside the HRA at market rents. There are currently 27 units in development, with plans to build further homes both for sale and market rent.

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