Housing White Paper – Local Government Association briefing
10 February 2017

The Housing White Paper Fixing our broken housing market sets out the Government’s strategy for building more of the right homes in the right places. It was published on 7 February 2017.

The full document is available on the Department for Communities and Local Government (DCLG) website.

This briefing summarises the main announcements of relevance to local government and sets out the Local Government Association’s (LGA) initial response. The LGA’s press release responding to the White Paper is available on the LGA website.

SUMMARY

- **Fixing our broken housing market** includes some encouraging proposals that reflect the recommendations in the LGA Housing Commission report, such as removing the starter homes requirement and increasing funding for planning departments. Importantly, it emphasises building the right homes in the right places to meet our wider ambitions for communities.

- However, local government’s ambition is much greater than the White Paper, which lacks substantive measures to support councils in enabling housing growth, and to build the genuinely affordable homes for those at the sharp end of the housing crisis.

- The LGA will work with the Government to take forward proposals, We will continue to push for an ambitious vision that recognises local government’s role in enabling additional housing, and in building the genuinely affordable homes that would resolve many of the challenges facing communities, the economy, and public services. In particular, we will continue to call for the housing borrowing cap to be lifted.

Chapter 1: Planning for the right homes in the right places

- Proposals to ensure certainty and to simplify the planning system, for instance by standardising process for assessing need, will help with the plan-making process, as will measures to increase land transparency. However, it is crucial that the process remains locally led and that measures do not impose national housing targets on local communities.

- New powers for councils to establish local development corporations provide an opportunity for councils to innovate in the delivery of sustainable new communities. While councils support the intention behind proposals to

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require 10 per cent of sites being 0.5 hectare, it will be difficult to achieve in practice and limit local responsiveness and so should be pursued voluntarily.

Chapter 2: Building homes faster

- Local planning authorities were under-funded by £195 million in 2015/16 and the LGA had called for local discretion over planning fees to address this.² The commitment to increase planning fees by 20 per cent will provide additional resources to fulfil duties and deliver homes. It is important that all areas with varying levels of housing growth should benefit from opportunities to access additional funding to respond to demand, and to seek to increase proactive delivery of additional homes.

- Applying fees to appeals, allowing councils to compulsorily purchase undeveloped land with permission, and to require starts on site within two years are steps in the right direction. However, measures to hold councils to account through a delivery test will only succeed if the councils have greater powers to ensure development than those proposed in the White Paper.

- Local government must play a central role in coordinating infrastructure investment linked to housing growth. The LGA will contribute to future consultations on the review of Section 106 and the Community Infrastructure Levy. Reforms should focus on providing simplicity, certainty and transparency that reduce the likelihood of developers overpaying for land. This is crucial to ensuring that the community benefits from approving housing with services, infrastructure and affordable well-designed, sustainable homes. Local government is exploring new routes to financing infrastructure, such as through land value capture.

Chapter 3: Diversifying the market

- The LGA has argued for strategies that stimulate wider interventions supporting building by councils, housing associations, developers and other partners through partnership. Local government is at the heart of this and can play a central role in stimulating and attracting new investment.

- The commitment to offer some support for councils to build through their Housing Revenue Accounts and other ventures is important. However, it must go much further to ensure all councils have the financial flexibilities and powers to build homes that are able to help those at the sharp end of the housing crisis. Councils need borrowing freedoms and the ability to retain 100 per cent of Right to Buy receipts to build new affordable homes. The housing crisis will persist until there is significant immediate investment in genuinely affordable homes.

- Councils must have flexibility to meet local need for affordable rented homes through delivery vehicles and other ventures. We are concerned by the suggestion that the Government wants to see an offer similar to Right to Buy in housing delivered through such ventures. Councils have often sought to build in ownership options into rented property and it is vital that they

² Local authority revenue expenditure and financing, 2015/16
maintain this flexibility so that the delivery of additional homes remains viable.

Chapter 4: Helping people now

- We are pleased that the Government has listened to concerns on starter homes delivery and introduced new flexibilities on the affordable home ownership products and a lower requirement of 10 per cent. However, every housing market is different and councils should have further flexibilities to adjust requirements to meet their new objectively assessed need, for instance to provide other affordable rent options.

- We want to have further discussion with the Government on how better to provide homes for our ageing population in ways that reduce pressures on health and social care services.

- The Government will need to go much further in allowing councils to build homes and to redress the impact of welfare reforms if it is to reduce homelessness.

BACKGROUND

CHAPTER 1: PLANNING THE RIGHT HOMES IN THE RIGHT PLACES

Getting plans in place

The White Paper has set out measures to:

- Consult on options for introducing a standardised approach to calculating assessed housing need.
- Set out in regulations a requirement for local plans and other local development documents to be reviewed at least once every five years.
- Consult on a requirement for local authorities to prepare a Statement of Common Ground, setting out how they will work together to meet housing requirements and other issue that cut across boundaries.
- Remove the expectation that every authority should be covered by a single local plan, enabling allocation of strategic sites through spatial development strategies produced by combined authorities or elected Mayors.
- Improve the availability of data on interests in land and consult on improving the transparency of contractual arrangements used to control land.

LGA view:

The LGA has raised concerns about the considerable time and resources required to get a plan in place, including evidence requirements and overall policy uncertainty. Standardised methodology for calculating assessed housing need could help streamline line the plan-making process by reducing inefficiencies and providing certainty to councils. It is important that councils retain the freedom to plan and meet the objectively assessed local housing need and to ensure land with community support for housing is made available. Measures in this White Paper should not set national housing targets on local communities.

Co-operation across wider areas can identify sufficient land for housing, but it can be difficult to achieve. Measures supporting wider strategic planning are encouraging, though it is important that proposals for areas to produce a Statement of Common Ground are not unnecessarily bureaucratic.
The LGA has argued that councils should have more tools and flexibilities to engage and shape local land markets. An effective land supply is critical to housebuilding and measures that increase transparency of land ownership and the options on land would help enable councils to fulfil this role.

**Making enough land available in the right places**

The White Paper has set out measures to:

- Deliver more homes on public sector land including provision of a new £45 million Land Release Fund, ensuring authorities can dispose of land with the benefit of planning permission granted by themselves.
- Introduce legislation that will allow locally accountable New Town Development Corporations to be set up, so that local areas can use them as a delivery vehicle for new settlements including garden cities, towns, and villages.
- Consult on extending flexibility to dispose of land at less than best consideration.
- Bring more brownfield land back into use through amendments to the NPPF to indicate that great weight should be attached to using suitable brownfield land within existing settlements for housing.
- Support small and medium sites through expectation on local planning authorities to support small ‘windfall’ development sites, where at least 10 per cent of residential sites allocated in local plans are of half a hectare or less. There will also be an expectation that local planning authorities will work with developers to encourage the sub-division of large sites.
- Maintain existing strong protections for the Green Belt and clarify that boundaries should only be amended in exceptional circumstances.

**LGA view:**

The LGA has argued for additional levers and support to release public sector land, and the new Land Release Fund will help with this policy ambition. The release of surplus public land is a significant opportunity to boost housebuilding, as demonstrated by the One Public Estate programme. It should be pursued in a long-term strategic plan to shape places and as part of a strategy to ensure land that is released is built on within an appropriate time frame.

We will contribute to the proposed consultation extending flexibility to dispose of land at less than best consideration. The LGA will continue to call for the Treasury to issue simple, clear central guidance to public bodies on how to consider land release in terms of wider public value, rather than just a short-term focus on achieving the highest immediate receipt.

The New Towns Act 1946 should be modernised to allow councils to establish and locally account for development corporations, which support councils to deliver sustainable new communities. We look forward to working with the Government to ensure the proposals allow councils to innovate in the provision and stewardship of new places. This may include forward financing infrastructure through land value capture, or enabling the release of land at values enabling mixed communities contributing towards affordable homes and community services.

Councils are seeking to do more to support small and medium-sized builders, including allocating land suitable for a mix of developers. However, the requirement for 10 per cent of sites being at 0.5 hectares or less will be very difficult to implement.

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3 [http://www.local.gov.uk/onepublicestate](http://www.local.gov.uk/onepublicestate)
in practice and restrict the capacity of the local plan to respond to need. Instead, this target should be voluntary.

**Strengthening neighbourhood planning and design**

The White Paper has set out measures to:

- Strengthen the importance of early pre-application discussions, make clear that local and neighbourhood plans should set out clear design expectations, recognise the value of using design standards, and consult on improving energy performance requirements on new homes.
- Make further funding available to neighbourhood planning groups and amending planning policy so that groups can obtain a housing requirement figure from the local planning authority.
- Make better use of land for housing by encouraging higher densities.

**LGA view:**

Councils recognise the importance of ensuring that new developments are sustainable, high quality, and are places where people want to live, work and enjoy their time. The commitment to review current energy performance standards is important. The Government should go further to review on housing standards to look at where improvements can be made to the baseline quality of new homes.

Councils are responding positively to neighbourhood planning. The commitment for further funding to neighbourhood planning groups should be taken further with a full review of the financial support provided to councils to meet their statutory duties in relation to neighbourhood planning.

Approved neighbourhood plans have significant status in the determination of applications for planning permission. As such it is crucial that they are based on a robust evidence base with deliverable policies, in the same way that applies to developing a Local Plan setting out the strategic needs and priorities of the wider local area.

Councils recognise the need to maximise delivery on suitable sites, particularly in areas where there is high housing demand. Many are already seeking to secure higher density housing. It is important that councils retain local discretion to decide the right levels of density for new housing across their local areas based on local context, including accessibility, infrastructure capacity and local housing needs.

**CHAPTER 2: BUILDING HOMES FASTER**

**Resourcing planning departments and increasing certainty**

The White Paper has set out measures to:

- Allow local authorities to increase planning fees by 20 per cent from July 2017 if they commit to invest the additional fee income in their planning department, and consider allowing an increase of a further 20 per cent for those delivering a given level of housebuilding, and making £25 million available for areas planning for more homes.
- Consult on introducing a fee for making a planning appeal, which could be capped at £2,000 for a full inquiry.
- Give local authorities the opportunity to have their housing land supply agreed on an annual basis, and fixed for a one-year period.
LGA view:

The LGA has argued that council planning departments need to be sufficiently resourced to fulfil their functions and to deliver more housing. We are pleased that this has been acknowledged in the White Paper. Currently taxpayers are subsiding approximately 30 per cent of the estimated cost of processing planning applications, and we have argued that fees should be set locally by councils. Charging fees for appeals will be another important step for reinforcing the prominence of the Local Plan. Councils should be able to retain the fees to invest in planning departments.

Currently councils that have successfully demonstrated a five-year housing land supply can still be subject to speculative appeals, leading to approval of inappropriate development sites outside the Local Plan. It is important that when councils have spent time establishing a Local Plan and identified land for housing that the assessment is fixed, reducing the opportunity for developers to appeal.

We are pleased that the White Paper will fix housing land supply assessments for a one-year period and will pursue discussions on how areas could fix longer time-frames. There should also be greater recognition of councils longer term housing land supply beyond five years, for example approved major developments have a ten-year land supply.

Infrastructure and skills for housing

The White Paper has set out measures to:

- Review the system for how developers contribute towards infrastructure and affordable housing through Section 106 and the Community Infrastructure Levy, to be published in the Budget on 8 March 2017.
- Ensure provision of infrastructure through the £2.3 billion Housing Infrastructure Fund which will be open to bids in 2017 with funding for four years, consulting on requiring council planning policy to deliver digital infrastructure, and to review how utilities companies can be prevented from holding up development.
- Pursue measures to address skills shortages in the construction industry.

LGA view:

The LGA has argued that local communities are most likely to support development when it is accompanied with the supporting services and infrastructure that places need to prosper. Councils must be at the centre of models for bringing together infrastructure strategy and spending in ways that build homes.

We will contribute to the review on Section 106 and the Community Infrastructure Levy, which needs to be robust, clear, transparent and simple. Reforms should also offer absolute certainty in the obligations on developers to provide infrastructure and affordable housing contributions, in ways that reduces the risks that a developer overpays for land.

The LGA has argued for innovation in infrastructure spending. The Housing Infrastructure Fund will provide crucial opportunities for councils to deliver infrastructure-led housing. We will work with the Government on the detail of the programme, and will be keen that councils have maximum flexibilities to invest in the infrastructure needed locally to deliver housing. We want to take forward more

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4 LGA media release, December 2016
http://www.local.gov.uk/media-releases/-/journal_content/56/10180/8115844/NEWS
ambitious approaches to forward financing infrastructure, such as through land value capture.

The LGA has called for greater tools to hold utilities companies to account when development is held up, including for digital infrastructure. We will push for reforms to planning policy to support local authorities to have more meaningful discussions with broadband providers and help cement the link between digital infrastructure provision and new housing developments.

Councils are well-placed to work with schools and colleges to ensure people can gain the skills that local companies desperately need to design and build homes, and should have greater powers to resolve skills mismatches in local economies. In *Skills to Build* we have set out our case for how councils can help provide developers with the skills that they need.\(^5\)

**Local authority and developer accountability for building homes**

The White Paper has set out measures to:

- Introduce a housing delivery test to hold local authorities and their wider interests to account for delivering homes, requiring a local authority to publish an action plan where the numbers of new homes are lower than the number of those suggested are needed.
- Hold local authorities and developers to account by requiring information about the timing and pace of delivery for new housing, encouraging local authorities to consider potential build out rates when granting permission.
- Consider options for shortening the timescales for developers to implement a permission from three years to two years, and supporting councils to use compulsory purchase powers to support build out of stalled sites.

**LGA view:**

The LGA has argued that it is essential councils have real tools to engage and incentivise developers to build out sites where communities have agreed to development. We look forward to working with the Government on the detail.

Support for councils to make greater use compulsory purchase powers to unlock stalled sites is significant in helping ensure development on sites with permission, although this will do little to speed up build-out rates. Similarly, while measures requiring starts within two years of being granted permission would be a step in the direction, it does not ensure homes are completed at a reasonable rate.

House building is generally complex and risky, involving a wide range of partners. Councils are committed to building homes where they are needed but do not have all the planning powers, such as those set out in our Housing Commission report\(^6\), to actually ensure it. This must be recognised by the proposal to apply delivery test and requiring action from councils when housing delivery has not met forecast need, and the measures put in place to reduce the risk of reverting to presumption in favour of sustainable development.

\(^5\) [http://www.local.gov.uk/documents/10180/49942/Skills+to+Build+-+Creating+the+houses+and+jobs+our+communities+need/c624085f-6e56-4cb7-9e83-5a37f481feda]

\(^6\) [http://www.local.gov.uk/documents/10180/7632544/LGA+Housing+Commission+Final+Report/a84df8b5-4631-4320-8b33-567c549aadfa]
CHAPTER 3: DIVERSIFYING THE MARKET

Council and housing association house building

The White Paper has set out measures to:

- Determine a rent policy for council and housing association landlords for the period beyond 2020 to help them borrow against future income.
- Work with councils to understand all the options for increasing the supply of affordable housing, perhaps develop bespoke housing deals with authorities in high demand areas and with an ambition to build, and consider whether additional capacity support is needed for councils to innovate in housing delivery.
- Encourage councils delivering affordable rented housing through alternative vehicles to offer tenants similar rights to other affordable rented homes, including the Right to Buy.
- Commit to implementing measures to allow housing associations to be classified as private sector organisations, and urge them to explore every avenue for building more homes and improve efficiency to focus on house building.

LGA view:

Councils play a wide and varied role in enabling housing growth across their areas working with housing association and developer partners. It is important that this enabling role continues to be acknowledged, encouraged, and supported.

The LGA has argued for greater longer-term certainty and flexibilities for Housing Revenue Accounts so that councils can plan investment in delivering new housing that helps them meet their housing duties. Rental certainty after 2020 will be an important first step; however, councils need borrowing freedoms and the ability to retain 100 per cent of Right to Buy receipts to rapidly build new affordable homes. The housing crisis will persist until there is significant immediate investment in genuinely affordable homes.

It is important to acknowledge and encourage the role councils are playing in seeking to plug gaps in local housing markets through local housing companies and other delivery vehicles. Councils must have flexibility to meet local need for affordable rented homes through delivery vehicles and other ventures. We are concerned by the suggestion that the Government wants to see an offer similar to Right to Buy in housing delivered through such ventures. Councils have often sought to build in ownership options into rented property and it is vital that they maintain this flexibility so that the delivery of additional homes remains viable.

Housing associations will be vital partners for councils in helping to build more homes and house the more vulnerable in our society. We are supportive of measures urging housing associations to build more and councils want to work with them to meet the needs of everyone in their local area.

Diversification of private house builders

The White Paper has set out measures to:

- Support the market of small and medium-sized builders and custom builders by launching the £3 billion Home Building Fund and partnering with them in the Accelerated Construction programme to build on surplus public land.
• Build more homes for private rent by changing the NPPF encouraging councils to plan for Build to Rent products and make it easier for developers to offer affordable private rented homes.
• Ensure three or more year tenancies on schemes that benefit from these changes.
• Support modernisation of the housebuilding sector and faster methods of construction, including through the Accelerated Construction Programme and Home Builders Fund and work with industries and local areas keen to promote this type of manufacturing.

\textit{LGA view:}

We have called for new measures to support the diversification of the private housebuilding industry. The strategy for supporting the diversification of the private market will take time to deliver, and is unlikely on its own to build all the housing our communities need. In the short-term it is critical to enable councils to build more affordable homes where the market has undelivered.

There is a good opportunity to stimulate additional supply through institutional investment in Build to Rent products, which councils are keen to enable as part of the wider housing mix. The wider role for councils in stimulating institutional investment into new housing should also be better acknowledged and supported. Three-year tenancies in Build to Rent property are welcome but will likely form a very small proportion of overall housing stock, we are also interested to understand more about a new affordable private rented property.

\textbf{Future role of the Homes and Communities Agency}

The White Paper has set out measures to:

• Relaunch the Homes and Communities Agency as Homes England, which would support councils to build on public sector land working with local public sector partners, deliver housing of all tenures, and support infrastructure delivery linked to housing.

\textit{LGA view:}

The LGA has argued for greater capacity support for local areas to deliver additional housing, and councils themselves can play a significant role in enabling house building locally. A reformed role for the Homes and Communities Agency working with local partners could play an important role in enabling this, and we will work with Homes England to support councils and their local partners to build more homes.

\textbf{CHAPTER 4: HELPING PEOPLE NOW}

\textbf{Starter Homes}

The White Paper has set out measures to:

• Target starter homes at households that need them most with an income of less than £80,000, or £90,000 in London, and that eligible first-time buyers would also be required to have a mortgage.
• Implement a 15-year repayment taper so that when the property is sold some or all of the discount is repaid.
• Replace the proposed starter homes requirement with an affordable home ownership requirement of 10 per cent on a site-by-site basis, and it be for councils to work with developers to agree the mix of starter homes, rent to
buy, shared ownership or other products.

- Amend the NPPF to allow brownfield land to be released with a higher proportion of starter homes, extending the exception site policy to include other forms of brownfield land, and to support land remediation with the £1.2 billion starter home land fund.

LGA view:

The LGA has argued for local flexibility in delivering starter homes alongside the mix of other affordable housing products that meet the locally assessed need, including affordable homes for rent. Therefore, we are pleased that the Government has listened to these concerns and that the starter homes requirement of 20 per cent is not being pursued. Looking ahead we want to explore flexibilities for councils in housing markets that find that 10 per cent requirement home affordable ownership products on sites do not meet their new assessments of local housing need.

Helping people afford a home

The White Paper has set out:

- Plans to introduce the Lifetime ISA, supporting younger adults to save flexibly for the long-term giving them a 25 per cent bonus on up to £4,000 of savings a year.
- Plans to consult on the future of the Help to Buy Equity Loan scheme.

LGA view:

Research for the LGA’s Housing Commission highlighted the financial pressure on first time buyers.\(^7\) We want to contribute to the discussion on future policy of interventions that support households to save for home ownership, and welcome the focus on both older and younger people from the White Paper as neither group are well served in the current housing market.

Extended right to buy for housing association tenants

The White Paper has set out:

- The Government’s existing commitment to extend the Right to Buy to housing associations through a regional pilot.

LGA view:

We are pleased that the costs for the extended pilot are being met by the Government. However, it is still not clear how the extension of the Right to Buy will be funded in the longer term. Councils are still facing uncertainty over the prospect of a forced sales of their assets to fund the extended right to buy.

The LGA wants to decouple the two policies and make it voluntary for councils to decide whether or not to sell their higher value homes. The policy should also be implemented in ways that allow councils to build more homes. Councils should be able to keep 100 per cent of receipts to invest in building new homes.

\(^7\)http://www.local.gov.uk/documents/10180/7632544/LGA+Housing+Commission+Final+Report/a84df8b5-4631-4320-8b33-567c549aadfa
Government funding for affordable housing

The White Paper has set out:

- The Government’s existing commitment to fund a broader range of tenures through the Affordable Homes Programme, including the additional £1.4 billion announced in the Autumn Statement 2016.

LGA view:

The LGA continues to push for flexibility in the range of new homes delivered through the Affordable Homes Programme, including for social rent. We will continue to work with Government to ensure that funding for affordable housing is delivered effectively with councils as a key partners. Councils and housing associations will be able to deliver more homes if given flexibilities, for example, to combine grants with Right to Buy receipts, and to deliver more social rented properties more affordable lower-income households.

Protection for private tenants and leaseholders

The White Paper has set out:

- Existing measures on the private rented sector, consolidating them into a ‘fairer deal’ for rents, including a proposed ban on letting agent fees.
- Problems for leaseholders and the Government’s intention to consult on reforms designed to tackle unfairness.

LGA view:

We share the Government’s concern about the lack of clarity for private tenants. These are helpful measures but they do not tackle the underlying challenges arising from a legal and regulatory system that is out-of-date and requires reform to match the pace of the reality of the current private rented housing market.

The volume and complexity of regulations governing the sector can be confusing for landlords, tenants and councils. We want to work with the Government to review and modernise the framework to support councils’ ability to meet the expectations of their residents.

The LGA has supported proposals to encourage longer tenancies, as insecure housing can prevent people from living a full life. Councils argued for families to have 10-year tenancies during the debate on reforming the length of tenancies through the Housing and Planning Act, and for local flexibility on the length of tenancies for council housing, particularly for tenants with children.

We support the principle of greater protection for leaseholders and will be working with the Government to explore the role for local government and how this would be resourced.

Making best use of existing homes

The White Paper sets out:

- Existing policies on second homes and empty homes and reiterates the Government’s support for councils to take action on empty homes using existing powers
- Plans to consider whether additional measures are needed on top of tools
that direct the receipts from the Stamp Duty Land Tax on second homes to a Community Housing Fund.

**LGA view:**

It is important to make use of existing homes, although this will not solve problems with supply. We are pleased that the Government recognises the contribution that local government has made to bringing down the number of empty homes.

**Housing for older people**

The White Paper sets out plans to:

- Produce guidance for planning authorities on how their local planning documents should meet the housing needs of older and disabled people.
- Engage widely with stakeholders, including local government, on the different strategies through which partners can deliver better outcomes for older people.
- Publish a green paper on the future of Supported Housing this Spring following the consultation on a new funding model

**LGA view:**

There is an acute need to integrate housing with health and social care further and in ways that improve well-being and reduce demand on care services. This means building more attractive and suitable homes for older people, and adapting existing housing to better support ageing in ways that reduce pressures on health and social care services.

We will engage with the Government on its proposals for guidance to local authorities on the assessment of housing needs for older and disabled people. To deliver councils need tools in their viability negotiations with developers to ensure developers deliver more accessible homes.

We aim to take forward our ideas further with the Government and partners. Councils have responsibilities for planning, housing, social care and public health, as well as playing a strategic role in partnership with clinical commissioning groups and others in the planning and provision of healthcare services. They are well placed to proactively plan for meeting the housing, care and health needs of their ageing populations.

**Preventing homelessness**

The White Paper sets out:

- Recent government proposals to address homelessness such as their support for the Homeless Reduction Bill, doubling of the Rough Sleeping Fund, and refocusing on prevention.
- The intention to establish a network of expert advisors to work closely with all local authorities to help bring them to the standard of the best

**LGA view:**

The Government must work with councils to address the causes of homelessness by building more genuinely affordable homes and redressing the impact of welfare reforms that may increase the risk of homelessness among certain groups, for instance by lifting the Local Housing Allowance cap.
Councils are having to pick up the pieces from the failure to address rising homelessness, being forced to place more people in expensive temporary accommodation that is estimated to have cost £3.5 billion over the last five years.

We have supported the intent of the Homeless Reduction Bill to widen support available to non-priority groups which is in far more workable than the initial draft. Legislative change alone is unlikely to succeed unless councils gain greater tools to build council homes, to redress the gap between household incomes and rents, and sufficient resources to deliver duties.

The LGA will push to host the network of expert advisors, as it will be best placed to build positive relationships with councils and pursue a sector led approach to improvement.