

**SYSTEMS DESIGN WORKING GROUP
FLEXIBILITY TO INCREASE THE MULTIPLIER USING THE
PROPOSED INFRASTRUCTURE PREMIUM
PAPER PREPARED BY LGA AND GREATER LONDON AUTHORITY**

EXECUTIVE SUMMARY

This paper considers the legislative and policy implications arising from the proposed new powers to introduce an infrastructure premium – including any interactions with the existing powers available under the Business Rate Supplements (BRS) Act 2009. It outlines potential issues which the Government may wish to take into account in developing the policies and legislation for the proposed premium.

The main issues which are addressed are:

- whether the premium should be available to a broader range of authorities than combined authority directly elected Mayors (e.g. combined authorities without Mayors, county councils in areas without combined authorities and the Mayor of London) i.e. should the primary focus be on delivering infrastructure rather than political structures;
- what the Government's definition of 'new infrastructure' is and whether this would include projects which for example invest in delivering affordable housing – the existing BRS legislation (section 3 of the 2009 Act) explicitly prevents revenues being used for housing, educational or social care purposes;
- should areas be able to levy both a business rate supplement (under the 2009 Act) and an infrastructure premium or only one – and could it apply to only part of an area?;
- whether the Government will/should simply add to or amend the existing BRS legislation to deliver infrastructure premiums (as an alternative or additional variant) or introduce wholly separate legislation;
- What steps should authorities have to undertake before they are permitted to levy a premium (e.g. an initial and final prospectus model supported by a consultation with ratepayers on the former as used for BRS) in addition to the LEP approval;
- The operation of the Crossrail BRS in London and what lessons can be learned from this;
- How the existing Business Rate Supplement legislation operates and whether elements of the related secondary legislation needs to be revised – as the GLA has proposed – to address issues with the accounting (i.e. allowing projects with a debt repayment period of more than 10 years to be funded), administration (cost of collection allowances) and reporting (format of year end calculation) arrangements;
- Whether the £50,000 rateable value threshold for the BRS should also apply for the infrastructure premium (or a lower amount) – and what other reliefs should levying authorities be able to grant (e.g. for BID areas or empty properties as applies for BRS);

- How cross boundary issues can be addressed when an infrastructure project (e.g. a transport scheme) benefits a wider area than the LEP/combined authority or only a part of the LEP/combined authority area;
- How will the approval operate if LEP and combined authority boundaries differ; and
- How a LEP will approve the introduction of a premium and whether they will be able to vary it annually and/or override the policies of the Mayor/levying authority.

BACKGROUND

On 5 October as part of his speech to the Conservative party conference the Chancellor announced that England's largest cities with directly elected Mayors would be granted the power to levy a premium on business rates to fund infrastructure projects.

“And for those big cities with elected mayors, like London, Manchester and now Sheffield, I will go even further. Provided they have the support of the local business community, these mayors will be able to add a premium to the rates to pay for new infrastructure and build for their cities’ future.”

The explanatory information published by the Government to accompany the Queen's Speech on 18 May included the following statement in relation to this element of the proposed Local Growth and Jobs Bill. This indicated that this power to introduce an 'infrastructure premium' is now intended - at least initially - to be made available only to directly elected mayors in combined authority areas.

‘The Bill would give the ability to combined authority mayors to levy a supplement on business rates bills to fund new infrastructure projects, provided they have the support of the business community through the Local Enterprise Partnership. This is similar to the decision of local businesses in London to make a contribution towards Crossrail 1.’

This paper considers:

- The purpose of the proposed premium and what sort of projects it could be used to fund;
- whether the premium should be available to a broader range of authorities;
- How the existing Business Rate Supplement legislation operates in practice and whether elements of this need to be reviewed alongside the premium;
- What steps should authorities have to undertake before they are permitted to levy a premium;
- How the accounting and reporting arrangements could operate;
- How cross boundary issues can be addressed when an infrastructure project benefits a wider area than the LEP or only a proportion of the LEP area; and

- How a LEP will approve the introduction of a premium and whether they will be able to vary it annually and/or override the policies of the Mayor/levying authority.

WHICH AUTHORITIES SHOULD BE ALLOWED TO LEVY THE PREMIUM

The Chancellor initially stated that the power to levy the new premium would be available to directly elected Mayors of big cities to new fund infrastructure projects subject to the majority of the business representatives on the LEP supporting the proposals.

This has now been extended to include directly elected Mayors of combined authorities covering urban and rural areas although the definition would exclude the Mayor of London, combined authorities without elected Mayors and areas without combined authorities.

In developing the legislation to implement the new premium the Government will inevitably have to consider the interaction with the existing business rate supplement (BRS) powers.

Under section 2 of the Business Rate Supplements Act 2009 the following authorities have the power to introduce supplements up to a maximum cap of 2p (or 2 per cent of rateable value) subject to a minimum rateable value threshold of £50,000 (as prescribed by secondary legislation):

- Shire county councils in two tier areas
- Shire unitaries
- Metropolitan districts and
- The Greater London Authority

Following amendments made through the 2011 Localism Act such supplements can only be introduced under the 2009 Act following a ballot of eligible non domestic ratepayers.

Should the primary purpose of the new premium be to promote the delivery of infrastructure projects where this has local support from the business sector and local government. Or is its main objective to promote a particular type of political or governance structure?

Arguably if there is local support from the business sector via the LEP to use a premium to fund a proposed infrastructure project and this is endorsed by the local authorities in the area why should the lack of a Mayoral structure prevent its introduction? Similarly should the premium be available to Mayor of London as the Chancellor originally stated in addition to the existing BRS where the business sector via the LEP was supportive?

Do the group consider that the power to levy a premium should be made available to all areas of England where there is support from the business community;

- ***Directly elected Mayors for combined authorities (default position currently);***
- ***Combined authorities without elected Mayors;***
- ***Shire unitaries and county councils in areas without combined authorities; and***
- ***the Mayor of London?***

DEVELOPMENT OF LEGISLATION FOR THE PREMIUM

The Government will need to consider its legislative approach for the premium for example:

Should it simply amend the existing BRS legislation and regulations (i.e. add directly elected Mayors to the list of levying authorities in section 2 and remove the ballot provisions in section 7 subject to LEP approval) or introduce an entirely separate legal framework for the premium;

Should it be possible to have both a BRS and an infrastructure premium in an area where this is supported by local authorities and the business community; and

How will the Government ensure that the legislation and regulations are kept up to date to take into account changes in rating legislation, national policy or wider issues?

The next section sets out the main provisions of the BRS Act 2009 and its use to date to fund Crossrail.

WHAT DOES THE GOVERNMENT MEAN BY INFRASTRUCTURE

The Government has stated that the new premium must be applied to fund 'new infrastructure'.

The 2009 BRS Act requires that business rate supplement revenues must be used to support economic development priorities (i.e. revenue or capital) but explicitly excludes expenditure on:

Education and children's services
Social services
Delivering planning functions and
Housing

The legislation for the premium will need to be clear what authorities may use the infrastructure premium for. For example would the 'infrastructure' definition include using revenues to fund the provision of affordable housing in areas of high cost/high demand where there was support for this from the business community?

Also the Chancellor stated that the premium can only be used for 'new' infrastructure – what does this mean in practice?

Does the Group have any views on the definition of 'infrastructure' and should it include for example housing? Should it be restricted to 'new' infrastructure or could it be used to upgrade existing infrastructure?

USE OF THE BRS POWERS TO DATE BY THE GLA

To date only the Greater London Authority has used the BRS Act powers to finance £4.1 billion of the costs of the Crossrail project - £800 million as a direct contribution and £3.3 billion of borrowing which will be financed and repaid by the mid 2030s using BRS revenues. The Crossrail BRS has been set at a rate of 2p since April 2010 with a qualifying rateable value threshold of £55,000.

Appendix A summarises the:

- number of hereditaments liable to the BRS in each of the 33 London billing authorities,
- the proportion liable within each authority;
- the proportion of the total number of ratepayers liable London wide by billing authority; and
- the amounts collectable in BRS by authority in £m and as a proportion of the total.

Approximately 46,000 hereditaments are liable for the Crossrail BRS – equivalent to less than 16% of all hereditaments in the capital. This ranges from 33% of assessments in Westminster to fewer than 6 per cent in Lewisham. Westminster accounts for 25% of all hereditaments liable to the BRS in London – with Camden (8%) and the City of London (10%) ranking third and second.

Almost half of BRS revenues are generated from just three billing authorities out of 33 (Westminster – 29%, City – 14% and Camden – 8%). By contrast ten of the 33 billing authorities collect £2 million or less in BRS per annum.

The BRS in London generates around £223 million per annum – ranging from as low as £218m to as high as £234 million in the six years since it was introduced. It therefore provides a relatively stable income stream and is therefore ideal as a mechanism to finance long term borrowing. But the above figures do illustrate how reliant the taxbase for the BRS is on a limited number of authorities even in London.

Were there to be a similar £50,000 threshold for the infrastructure premium the sums that could be generated in BRS in areas with lower taxbases than London would inevitably be much lower.

Further details on the Crossrail BRS can be found at www.london.gov.uk/crossrail-brs

Does the group think any lessons can be learned from the success of the Crossrail BRS in London – whilst recognising that even in the capital given the existing threshold only 16% of properties are viable and the revenues are heavily concentrated in a relatively small number of the capital's 33 billing authorities?

PROVISIONS OF THE BUSINESS RATE SUPPLEMENTS ACT 2009

<http://www.legislation.gov.uk/ukpga/2009/7/contents>

As outlined above the BRS Act 2009 permitted a business rate supplement to be levied across all English local authority areas and by all local authority tiers with the exception of London boroughs, the Corporation of London and shire districts in two tier areas. The Corporation of London does however have a separate power to levy an additional premium reflecting its unique circumstances and low resident population. So in principle existing legislation permits all areas of England to levy a BRS to fund infrastructure and economic development projects.

Section 3 of the Act specifies that a BRS may only be raised for expenditure on a project that the authority is satisfied will promote economic development in its area. As highlighted above It is therefore not explicitly restricted to fund capital investment or infrastructure projects.

Section 7 of the original act required a ballot of ratepayers to be held before a BRS could be imposed only where the supplement would fund more than one third of the costs of the proposed project. An exemption to this requirement was granted for any supplements introduced before 1 April 2012 to facilitate the use of the BRS to fund the Crossrail project which was jointly supported by the Mayor of London and the Government. The Localism Act amended section 7 to make ballots mandatory for all new supplements.

The BRS act permits a levying authority to impose any number of supplements it wishes providing that they add up to no more than 2p in total - subject to a rateable value threshold. The Rateable Value conditions regulations SI 2542 2009 prescribed that a BRS could only be levied on hereditaments with a rateable value above £50,000.

A BRS must be levied on a consistent basis across the levying authority area and therefore it is not possible to apply a higher rate in billing authorities (or other defined localities) where ratepayers were most likely to benefit from the proposed investment

(e.g. they have stations on the proposed rail, metro or tram link). This differs from the community infrastructure levy where differential rates are permitted within a billing authority and in the case of the Mayor of London's CIL between London boroughs.

Reliefs for the BRS operate on a consistent and pro rata basis with ratepayers' national non domestic rating bills with two exceptions. Firstly the levying authority may exempt all empty properties as a class from paying the BRS – irrespective of their eligibility for empty rate reliefs – and secondly it may apply an offset to reduce the BRS liability for ratepayers in business improvement districts (BIDs).

The Act also permitted business improvement districts to charge property owners a levy subject to a ballot where local ratepayers were subject to a BRS (so called 'BRS-BID' levies under Schedule II). This latter policy has not been adopted so far in practice given the difficulty of identifying property owners although two BIDs in central London have expressed an interest in introducing such a scheme.

Before levying a supplement levying authorities are required to prepare an initial prospectus - which prior to the localism act merely had to be consulted upon but thereafter had to be put to a ballot of eligible ratepayers – and a final prospectus. The items required to be included in the prospectus are set out in schedule I of the Act. A copy of the Crossrail BRS final prospectus is available at https://www.london.gov.uk/file/5474/download?token=oCSh_HNt

If a levying authority departs from the policies set out in its final prospectus – even where this would reduce the BRS multiplier or the number of ratepayers liable – it is required to reballot all eligible ratepayers to approve the change according to legal advice the GLA received when it wished to raise the £55,000 rateable value threshold between revaluations (a variation not provided for in its prospectus).

Section 18 of the BRS Act requires the levying authority to give written notice to each billing authority in its area prior to the financial year for which it intends to impose a business rate supplement. Levying authorities are also required to provide an annual update to ratepayers for annual billing.

Does the Group consider that the provisions and requirements of the BRS Act provide an appropriate basis for the proposed infrastructure premium – or should alternative arrangements apply e.g.

- ***Does the initial prospectus, consultation and final prospectus model for introducing a BRS provide a suitable model for the infrastructure premium;***

- ***Should the levying authority be able to depart from its final prospectus variation powers without recourse to a further consultation process where it is simply proposing reducing the tax rate or the number of ratepayers liable?***
- ***Should there be a rateable value threshold of £50,000 for the premium as for the BRS, a lower figure (e.g. the £15,000 SBRR threshold) or none at all;***
- ***What implications does this have for the viability of premiums in areas with low taxbases;***
- ***Should a levying authority be permitted to levy multiple supplements up to a maximum of say 2p or just one;***
- ***Would it be desirable to permit levying authorities to apply different rates for the premium across their area in proportion to the estimated benefits from the infrastructure projects being funded from the premium (e.g. for a transport project ratepayers in areas on the rail/tram route would pay a higher rate);***
- ***Should reliefs operate in parallel to NNDR on a pro rata basis and should empty properties and BID areas be eligible for a more generous treatment subject to the determination of the levying authority as applies for the BRS.***

BRS SECONDARY LEGISLATION

In order to facilitate the administration and accounting of the BRS a number of pieces of secondary legislation were introduced:

Administrative expensive regulations

The Business Rate Supplements (Administrative Expenses) (England) Regulations SI 134 2010 (http://www.opsi.gov.uk/si/si2010/uksi_20100134_en_1) were laid in 2010. These prescribe the calculation of the set up costs (year 1) and ongoing cost of collection allowances for billing authorities which declines annually from 0.5 per cent in the first year of a BRS to only 0.15 per cent in year eight of the aggregated estimated income from the supplement across the levying authority area. The aggregate allowance is apportioned to billing authorities in proportion to their share of the total number of hereditaments liable to the BRS – with no minimum fixed cost element.

The GLA has invited CLG to amend the regulations to provide for a minimum flat rate amount for all billing authorities with a variable top up linked to hereditament shares as the current methodology even in London is likely to result in several boroughs in 2017-18 receiving less than £3,000 per annum to discharge their BRS collection and reporting responsibilities.

BRS Transfer to Revenue Account Regulations

The Business Rate Supplements (Transfers to Revenue Accounts) (England) Regulations SI 2543 2009 (http://www.opsi.gov.uk/si/si2009/pdf/uksi_20092543_en.pdf) as amended by the Non-Domestic Rating and Business Rate Supplements (England) (Amendment) Regulations 2011'; <http://www.legislation.gov.uk/uksi/2011/255/contents/made> set out the process and methodology for calculating the amounts forecast to be and actually collected in BRS. Different processes apply where a levying authority is not a billing authority (e.g. London and two tier shire county councils) from where they are one and the same (e.g. shire unitaries and metropolitan districts).

Where they are different the regulations require that billing authorities:

- must provide an estimate of the amount they will collect for the next year to the levying authority subject to a 5 per cent contingency before 31 March (the provisional amount collectable);
- pay instalments to the levying authority in twelve monthly instalments ;
- pay a late instalment charge where a payment is made late;
- be able to vary the amounts payable during the year once per quarter – similar to the old NNDR2 arrangements – although no billing authority has submitted such a request to date in London;
- calculate the amount they have collected for the year and submit a return to the levying authority by 31 May in the following financial year;
- adjust for any over or underpayments compared to the instalments paid by 30 June in the following financial year.

Examples of the returns used by the GLA (BRS1 for the provisional return and BRS3 for the outturn) are attached for information.

The determination of the amount the billing authority has actually collected by way of BRS is determined using a 'pro rata' calculation as set out section 7 to Schedule II of the BRS transfer regulations. It therefore differs from the approach used for reporting the year end NNDR outturn position to CLG via the NNDR3 form. This pro rata calculation requires billing authorities to determine the total amount paid into their collection fund during the year (including both BRS and NNDR revenues and in the case of the Common Council of the City of London its City Supplement) net of reliefs, exemptions and refunds.

The calculation then multiplies this sum by the share which the BRS liability for the year (i.e. the amount due from those liable to pay BRS) represents of the total liability of all ratepayers for NNDR and BRS combined (i.e. the liability to NNDR and BRS of all ratepayers including the NNDR liabilities of those ratepayers not liable to pay BRS). In determining the BRS and NNDR liability adjustments are made for prior year liabilities not yet discharged and additionally for in year refunds made in respect of BRS and NNDR respectively.

The GLA and London billing authorities have requested that CLG amend the regulations to permit a locally determined outturn calculation more in line with the liability methodology used for NNDR. The existing 31 May deadline for submitting final returns also needs to be brought forward due to the earlier closedown timetables from 2017-18 – ideally to much earlier in May.

BRS Accounting Regulations

<http://www.legislation.gov.uk/ukxi/2010/403/contents/made>

The Business Rate Supplements (Accounting) (England) Regulations 2010 set out the accounting arrangements including the requirement for levying authorities to prepare a BRS revenue account. The GLA has requested a minor technical amendment to the BRS Accounting regulations relating to the treatment of deficits on BRS revenue accounts – which will generally apply where a supplement is used to fund borrowing. The proposed change would ensure that the regulations are suitable for projects such as Crossrail where the payback/debt repayment period exceeds ten years.

BRS Collection and Enforcement Regulations

Business Rate Supplements (Collection and Enforcement) (England) Regulations SI 187 2010 http://www.opsi.gov.uk/si/si2010/pdf/ukxi_20100187_en.pdf set out the collection and enforcement arrangements which are intended to align the BRS with NNDR as they are collected via the same bill and are subject to the same reliefs in most cases.

BRS Rateable Value Conditions Regulations

The Business Rate Supplements (Rateable Value Condition) (England) Regulations SI 2542 2009 (http://www.opsi.gov.uk/si/si2009/pdf/ukxi_20092542_en.pdf) specify that the rateable value threshold for a BRS is £50,000. The Crossrail BRS has a threshold of £55,000 – reflecting the fact that a levying authority may increase this above the minimum. The Crossrail BRS prospectus also indicates it is the GLA's intention to vary the threshold in line with the percentage change in rateable values in London at each revaluation.

Does the Group consider these regulations for the BRS provide a suitable approach for the proposed new infrastructure premium – recognising the three areas which the GLA has highlighted which in its view require amendment (i.e. the accounting regulations to ensure projects with a payback period of more than 10 years can be financed, the transfer regulations in respect of the outturn calculation and its submission date of 31 May and the administrative expenses regulations to permit a more flexible and fairer approach to the calculation of collection allowances for billing authorities with lower taxbases)?

CROSS BOUNDARY ISSUES

In practice proposed infrastructure projects – particularly transport schemes - are very likely to cross LEP or combined authority boundaries.

Crossrail for example extends outside London to Essex, Berkshire and Buckinghamshire. The Mayor of London has no power to levy a BRS on ratepayers in these areas who will directly benefit from Crossrail – nor can he/she levy a Community Infrastructure levy on developers benefitting from the project on housing or commercial developments outside the GLA's boundaries. By contrast the BRS applies on a consistent basis across the GLA area irrespective of the relative benefits it offers to ratepayers depending on their location.

This highlights a number of issues that the Government will need to consider where proposed infrastructure projects cross combined authority boundaries or deliver economic benefits to neighbouring LEP or local authority areas. Clearly it is only right that businesses benefitting the most from an infrastructure project should make the greatest – or at least some - contribution towards its costs. It is to be hoped that authorities collectively working together would agree to develop joint proposals to fund projects but that clearly will not be viable if the power to levy the premium is not granted to areas without combined authority Mayoral structures.

Should premiums be able to be levied on areas outside the boundaries of a combined authority benefitting directly from an infrastructure project (e.g. rail or tram schemes) and how might the approval of LEP members for areas outside but adjoining the combined authority be obtained?

APPROVAL OF AN INFRASTRUCTURE PREMIUM BY THE LEP

The Government has stated that directly elected Mayors will have the power to levy a premium where this is supported by a majority of business representatives of the LEP.

This raises a number of practical issues which the Government need to consider e.g.

How representative of the local business sector are LEP members – should they be elected by the business community for example or appointed by the Mayor of the combined authority or by local representative bodies (e.g. Chambers of Commerce, BIDs, Federation of Small Businesses)?;

LEPs are generally not separate legal entities and exercise their financial and legal powers via an accountable body – do they need a formal statutory framework if they are to have powers to approve local taxes?;

What happens if the combined authority and LEP boundaries do not coincide?;

Should the LEP simply have the power to approve the introduction of a premium or should they have a say in reliefs policies, the annual setting of the premium or the rateable value threshold?;

Can the Mayor/levying authority vary the premium policies annually without reference to the LEP – or would they be able to overturn his/her decision by a vote of LEP members?

CONCLUSION

This paper has intended to highlight a number of issues which the Government should consider in developing the legislative arrangements for the proposed infrastructure premium. It may wish to reflect the issues raised in its summer consultation paper.

Are there any other issues that should be considered in relation to infrastructure premiums that are not covered above?

Would there be a case for creating a sub group to work specifically on infrastructure premiums to assist CLG in developing the necessary primary and secondary legislation given the complexity of the issues highlighted.

No of Hereditaments Liable to the Crossrail BRS and Proportion Liable by London Billing Authority in 2015-16

Billing Authority	Estimated No of Hereditaments With Rateable Values Above £55k	Estimated No of hereditaments liable to BRS as percentage of London Total	Estimated Proportion of Hereditaments Liable to BRS in Billing Authority Area
INNER LONDON			
City of London	4,644	10.1%	27.0%
Camden	3,690	8.0%	22.2%
Greenwich	543	1.2%	10.9%
Hackney	674	1.5%	6.8%
Hammersmith and Fulham	1,428	3.1%	15.5%
Islington	1,611	3.5%	14.8%
Kensington and Chelsea	2,260	4.9%	26.9%
Lambeth	845	1.8%	10.0%
Lewisham	334	0.7%	5.6%
Southwark	1,421	3.1%	13.2%
Tower Hamlets	1,540	3.3%	10.4%
Wandsworth	897	1.9%	10.1%
Westminster	11,392	24.7%	32.5%
OUTER LONDON			
Barking and Dagenham	469	1.0%	11.3%
Barnet	745	1.6%	9.0%
Bexley	508	1.1%	9.3%
Brent	847	1.8%	10.1%
Bromley	767	1.7%	10.4%
Croydon	935	2.0%	10.3%
Ealing	1,264	2.7%	13.2%
Enfield	768	1.7%	10.9%
Haringey	522	1.1%	7.7%
Harrow	407	0.9%	7.4%
Havering	614	1.3%	10.9%
Hillingdon	1,295	2.8%	15.9%
Hounslow	1,228	2.7%	17.5%
Kingston upon Thames	723	1.6%	15.0%
Merton	814	1.8%	15.0%
Newham	981	2.1%	13.7%
Redbridge	425	0.9%	6.8%
Richmond upon Thames	676	1.5%	11.3%
Sutton	396	0.9%	9.5%
Waltham Forest	400	0.9%	6.2%
LONDON TOTAL	46,063	100.0%	15.7%
INNER LONDON TOTAL	31,279	67.9%	19.4%

OUTER LONDON TOTAL	14,784	32.1%	11.1%
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Estimated Crossrail BRS Income and Proportion of London Total For Each Billing Authority in 2015-16
(Net of Forecast Billing Authority Collection Costs)

Borough	Estimated Net BRS tax take in 2015-16 £m	Income as % of London total
INNER LONDON		
City of London	31.0	13.9%
Camden	17.2	7.7%
Greenwich	2.0	0.9%
Hackney	2.0	0.9%
Hammersmith and Fulham	6.0	2.7%
Islington	5.8	2.6%
Kensington and Chelsea	9.3	4.2%
Lambeth	3.7	1.7%
Lewisham	1.3	0.6%
Southwark	6.7	3.0%
Tower Hamlets	12.2	5.5%
Wandsworth	2.5	1.1%
Westminster	64.6	28.9%
OUTER LONDON		
Barking and Dagenham	1.8	0.8%
Barnet	2.9	1.3%
Bexley	2.0	0.9%
Brent	3.0	1.3%
Bromley	2.3	1.0%
Croydon	3.4	1.5%
Ealing	3.6	1.6%
Enfield	3.1	1.4%
Haringey	1.4	0.6%
Harrow	1.2	0.5%
Havering	2.1	0.9%
Hillingdon	12.3	5.5%
Hounslow	5.0	2.2%
Kingston upon Thames	2.5	1.1%
Merton	2.5	1.1%
Newham	4.1	1.8%
Redbridge	1.2	0.5%
Richmond upon Thames	2.1	0.9%
Sutton	1.4	0.6%
Waltham Forest	1.3	0.6%
LONDON TOTAL	223.5	100.0%
Provision set aside for appeals/refunds (2%)	-4.5	
FORECAST RETAINED BRS INCOME AVAILABLE	219.0	

Note: This data is net of billing authority collection costs estimated at £0.45 million and represents the forecast amounts to be paid to the GLA. The forecast BRS income gross of billing authority collection costs is £224 million.