

Briefing Paper

Implementing Self Financing for Council Housing

February 2011

1. Introduction

1.1 Communities & Local Government published a paper: 'Implementing Self-Financing for Council Housing' on 1st February 2011. This paper contains the coalition government's detailed proposals for the introduction of self-financing to the Housing Revenue Account and follows papers issued by the former Labour government. Briefing papers on these papers are available on the 'AWICS' website:

- Housing Revenue Account Review – July 2009
- Reform of Council Housing Finance – July 2009
- Council Housing: A Real Future – April 2010
- Council Housing: A Real Future – AWICS response – July 2010

1.2 The concept of self-financing and the main elements of the proposed system remain unchanged but there are changes to the financial calculations and to some of the detailed proposals.

1.3 The paper addresses the following matters:

- The Self-Financing Settlement
- Ensuring an accurate valuation
- The surrounding policy framework
- Planning the transaction
- The implementation timetable
- Ongoing data requirements
- The subsidy system for 2011/12

1.4 The paper is accompanied by:

- A model that applies the settlement methodology to the data to provide indicative figures for each local authority
- A user guide to accompany this model
- A report on the model inputs, assumptions and outputs

1.5 The paper was launched by Grant Shapps MP, Minister for Housing, who said that:

"Today signals a landmark in the freeing up of councils to successfully manage their own housing stock for the benefit of their tenants. A change that has long been talked about, but the Coalition Government is actually delivering."

“Today we are publishing the information councils need to plan for this significant reform. Reforms which will see councils keep their own rents and spend them on their own housing. This includes a detailed description as to how their opening financial position will be determined and the process for implementing these reforms in April 2012. It also gives each local authority a much clearer idea as to exactly how they will be affected by the reforms. This will enable them to use the next 14 months to plan ahead and put themselves in the best possible position to maximise the benefits of the new freedoms.

“In line with the Government's emphasis on transparency, local authorities and tenants will be able to see how and why the valuation has altered since the proposals published in March 2010.

“Our proposals for self-financing for council housing will:

- Give councils the resources they need to manage their own housing stock for the long-term - correcting decades of under-funding*
- Give councils the incentives and flexibility they have sought to drive up quality and efficiency*
- Give tenants the information they need to hold their landlord to account - replacing the current opaque, centralised system with one which establishes a clear relationship between the rent councils charge and the services they provide*

“These reforms are fair. They are rooted in a consistent and tested calculation of the value of each council's social housing business, producing a sustainable self-financing settlement for each local authority. I expect all councils to welcome the reforms and to start planning now how to make the most of their new freedom.”

- 1.6 The Chartered Institute of Public Finance & Accountancy has been working with Communities & Local Government on the technical accounting aspects of self-financing. Adrian Waite is a member of the working party that was established to consider this. The Chartered Institute of Public Finance & Accountancy has published a consultation paper on the ‘Proposed Capital Finance Arrangements under the New Housing Finance System’. This principally considers the management of debt and depreciation. The deadline for responses to this consultation is 28th February 2011. This is considered further in the section on Capital Finance arrangements below.
- 1.7 These reforms only have implications for each stock-retaining local authority's ring-fenced Housing Revenue Account, and will not impact on their general finances, or on other local authorities.
- 1.8 Abolition of the subsidy system does not end the requirement for local authorities to maintain a statutory, ring-fenced Housing Revenue Account. Local authorities will still be required to account to their tenants for income from and expenditure to council housing separately from income and spending on other functions and services. The government considers that this continues to ensure that council taxpayers do not subsidise services specifically for the benefit of tenants and that rent is not used to subsidise functions which are for the benefit of the wider local community.

2. Overall Methodology

- 2.1 Valuations will be based on assumptions about each local authority's income and need to spend over thirty years. Assumptions about income will follow from the Government's social rent policy. The assumptions about expenditure needs will reflect evidence commissioned by Government in 2009 and 2010 about the costs of managing, maintaining and repairing the stock. This thirty year cash flow of income and expenditure will then be converted into a capital sum using standard discounted cash flow techniques.
- 2.2 The self-financing valuation will assume that local authorities will follow national social rent policy that comprises a number of different components:
- A 'formula rent' for each property, based on property values, property size and local earnings. Over time, all social landlords are expected to move their rents in line with this formula. At present most housing associations set rents at or close to the formula level, but council rents were on average still approximately 8% below this in 2010/11.
 - A 'guideline rent' that converges with the formula rent by 2015/16. The valuation will assume convergence with formula rents by 2015/16, followed by rental increase of 0.5% above inflation year on year.
 - A limit on individual rent rises of the Retail Price Index plus 0.5% plus £2 each year. This cap is designed to prevent excessively high increases in the rents of individual properties as they are moved over time to the formula rent. An estimate will be made for each landlord about the number of tenants whose rents could not move to the formula by 2015/16 without breaching this element of rent policy. The assumed income in the valuation will be reduced by this amount.
- 2.3 The spending needs built into the valuation are based on independent research about actual unit costs commissioned by the previous Labour government that are higher than those under the present subsidy system. The government considers that this approach to costs will give all local authorities more money to spend on managing, maintaining and repairing their stock than under the current system. In aggregate this works out at an increase to £545million a year for thirty years or a national average Major Repairs Allowance of £956 per dwelling per year and average management and maintenance allowances of £2,061 per dwelling per year. On average management and maintenance allowances are increased above the levels assumed in the housing subsidy system by 5.7% and major repairs allowances by 28.9%.
- 2.4 The assumed rents and costs will be used to produce a notional thirty year business plan of income and expenditure for each local authority landlord's business. This will be converted into a stock valuation using standard discounted cash flow principles, using a 6.5% discount rate.

- 2.5 To calculate the payment to or from Government, the valuation will be compared with the notional amount of housing debt supported by Housing Revenue Account subsidy. If the valuation is higher than this assumed debt figure, the local authority will be required to pay Government the difference. If the valuation is lower, the Government will pay the difference to the local authority. Payments from central Government will in most cases not go to local authorities directly, but will be used to redeem debt held by the local authority.

3. Increases in Housing Revenue Account debt at National Level

- 3.1 In March 2010 the former Labour government published a prospectus that proposed self-financing with an increase in debt at national level from £21.49billion to £25.15billion, an increase of £3.66billion. The current paper proposes an increase in debt at national level from £21.43billion to £28.14billion, an increase of £6.71billion.
- 3.2 The principal reasons for the increase in the level of debt proposed of £3.05billion are shown below and are described in section four.

Reasons for the Increase in Housing Revenue Account debt at national level

	£billion
Updating rent and cost inflation assumptions	3.37
Moving the implementation date to 2012	1.75
Use of a 6.5% discount rate rather than 7%	1.21
Removing Private Finance Initiative subsidy from the valuation	1.18
Removing debt associated with stock transfers	0.81
Removing cost of proposed 10% minimum allowance uplift	0.05
Less	
Including funding for disabled facilities adaptations	1.61 –
Updating data on stock numbers, stock types and rents	1.32 –
Including a thirty year forecast of stock losses from Right to Buy sales	0.86 –
Spending Review funding for decent homes	0.61 -
Including debt management expenses	0.29 –
Including stock losses from demolitions	0.28 -
Adding costs of early redemption premiums and leases	0.21 –
Removal of negative Subsidy Capital Financing	
Requirement from opening debt	0.10 -
Updating Housing Revenue Account debt figures for councils with stock	0.04 -
Total	3.05

3.3 At local level the level of debt per dwelling varies considerably as shown below:

Highest debt per dwelling:

- Waverley - £38,250
- South Cambridgeshire - £37,500
- Wokingham - £36,242
- St. Albans - £36,182
- Guildford - £35,994

Lowest debt per dwelling

- Hackney - £4,706
- Blackpool - £6,504
- Isles of Scilly - £7,059
- Lincoln - £7,586
- Sheffield - £8,089

3.4 However, the final self-financing settlement will not be based on the data in this paper. The government intends to issue this in draft self-financing determinations in November 2011 and final determinations in January 2012.

4. Detailed Changes that affect the Valuation

4.1 Updating Rent and Cost Inflation Assumptions

4.1.1 The government has updated rent and cost inflation assumptions to reflect the latest Office of Budgetary Responsibility forecasts. Rents, for example, are based on the increased rents assumed in the 2011/12 housing subsidy determination and on convergence in 2015/16. This has led to an assumption of increased rent and therefore an increased valuation.

4.1.2 The government has also commissioned consultants to revisit the distribution of increased expenditure allowances and has incorporated their recommendations into the calculation. The government states that these favour London Boroughs and some other councils with large stock numbers.

4.2 Moving the Implementation Date to 2012

4.2.1 The previous government's data assumed that self-financing would be implemented in 2011. The current figures assume that it will be implemented in 2012. Updating the data by a year leads to the use of higher rents and therefore a higher valuation.

4.3 Use of a 6.5% Discount Rate rather than 7%

4.3.1 The government has decided to use a 6.5% discount rate as they consider that this is an appropriate rate and is consistent with rates used in valuations for housing stock transfers. The previous government had proposed the use of a 7% discount rate as a way of creating 'headroom' so that local authorities could use the self-financing model to build new council houses.

4.4 Removing Private Finance Initiative Subsidy from the valuation

4.4.1 Following representations from local authorities with Private Finance Initiative schemes, the government has decided to continue paying Private Finance Initiative subsidy separately as a revenue subsidy rather than including Private Finance Initiative costs in the valuation. This increases the valuation for authorities with Private Finance Initiative schemes but has no effect on authorities that do not have housing Private Finance Initiative schemes.

4.5 Removing debt associated with stock transfers

4.5.1 The amendment to the Subsidy Capital Financing Requirement line encompasses both the removal of debt relating to whole stock transfers that have been approved since the March consultation (including Bolton and Stockton) and the estimates pertaining to partial stock transfers (including Oldham and Hull). It breaks down as roughly £600million relating to whole stock transfers, and an estimate of £200million relating to the partial stock transfers.

4.6 Removing cost of proposed 10% minimum allowance uplift

4.6.1 The previous government proposed a 'collar' that would give all Councils a minimum increase in allowances of 10%. The present government has decided not to proceed with this. This increases the valuation at national level but does not affect local authorities that would not have benefited from the 'collar'.

4.7 Including funding for disabled facilities adaptations

4.7.1 The Building Research Establishment carried out research for Communities & Local Government in 2009 and concluded that the cost of meeting newly arising need for disabled adaptations is £60 a dwelling a year across the whole stock. The government proposes to fund this estimate of costs in full and to allocate it on a simple per dwelling basis. The annual value of this extra funding is around £116million.

4.8 Updating data on stock numbers, stock types and rents

4.8.1 The use of updated data on stock numbers, stock types and rents has the effect of reducing the valuation.

4.8.2 The government wishes to avoid a situation where the completion of regeneration schemes that are at an advanced stage would be prevented. They therefore propose to exclude any assumed income and costs associated with dwellings where there are firm plans to demolish them over the next few years.

4.9 Including a thirty year forecast of stock losses from Right to Buy sales

4.9.1 The government has built into the valuation a forecast for losses of income and costs when properties are sold under the Right to Buy scheme. The forecast is based on national forecasts for house sales issued by the Office for Budgetary Responsibility and have been disaggregated to local authority level using recent historical data about regional levels of Right to Buy sales. This has the effect of reducing the valuation.

4.10 Spending Review funding for decent homes

4.10.1 The Comprehensive Spending Review allocated £260million in 2011/12 and £352million in 2012/13 for addressing the backlog of decent homes work. The Homes & Communities Agency has come up with proposals for the allocation of these resources to local authorities. It is proposed that these sums be allocated through the Supported Capital Expenditure mechanism in 2011/12 and by making reductions in opening debt in 2012 for 2012/13. This therefore has the effect of reducing the valuation.

4.11 Including Debt Management expenses

4.11.1 Some local authorities will take on new responsibilities for managing debt. The valuation includes funding for consequential overheads including employing treasury managers. The funding includes a fixed and a variable sum.

4.12 Including stock losses from demolitions

4.12.1 Councils raised concerns that the valuation assumed that all stock would be retained for thirty years. The government does not wish to prevent the completion of regeneration schemes that are at an advanced stage. The valuation will therefore exclude incomes and costs associated with dwellings where there are firm plans in place for their demolition.

4.13 Adding costs of early redemption premiums and leases

4.13.1 The government recognises that other costs are met by the existing housing subsidy system. These include charges for the early redemption of loans and the costs of some leases. These costs will now be included in the valuation.

5. Other implications

5.1 Borrowing Limit

5.1.1 The government has confirmed that it will place a borrowing limit on the Housing Revenue Account after self-financing is introduced. This will be done by making a determination that will establish:

- The 'Council Housing Borrowing Requirement' that will measure the actual amount of borrowing a local authority uses to finance its council housing and will be similar to the existing 'Housing Revenue Account Capital Financing Requirement'.
- The 'Council Housing Borrowing Limit' that will be the limit on borrowing for each authority. The limit will usually be set at the level of the self-financing valuation meaning that authorities will only be able to borrow the equivalent of the difference between their Housing Revenue Account Capital Financing Requirement and their 'Subsidy Capital Financing Requirement' – the amount of debt that the government assumes they have for subsidy purposes.

5.1.2 The government justifies the borrowing limit as follows:

“Our reforms must not jeopardise the government’s first priority, which is to reduce the national deficit. Borrowing by local authorities for housing purposes is included as part of the Public Sector Borrowing Requirement and so the borrowing arising from self-financing must be affordable nationally as well as locally. The prudential rules do not address this and so we will therefore limit the borrowing for council housing in each local authority.

“We recognise that limiting borrowing will place pressures on some landlords, particularly in the early years of self-financing. These pressures should, however, be seen in the context of a very tight fiscal position across the public sector over the next few years... We expect all councils to be able to manage these pressures.”

- 5.1.3 If the Housing Revenue Account Capital Financing Requirement is above the Subsidy Capital Financing Requirement the limit will be set at the level of the Housing Revenue Account Capital Financing Requirement, that is, the actual level of debt at the point of self-financing. However, prudential borrowing that is carried out in 2011/12 will be discounted unless approved by Communities & Local Government.
- 5.1.4 If a Council has borrowed money to finance new build as part of the National Affordable Housing Programme the government will take account of this in calculating the borrowing limit. The limit will be the higher of the self-financing valuation plus the prudential borrowing for those schemes or the Housing Revenue Account Capital Financing Requirement plus the prudential borrowing for those schemes.
- 5.1.5 The Localism Bill includes powers to vary the definition or calculation of the Council Housing Borrowing Requirement and the Council Housing Borrowing Limit for one, some or all local authorities.
- 5.1.6 The Borrowing Limit is seen by some to be at odds with the principles of localism, prudential borrowing and self-financing and many in the sector have expressed disappointment that the government plans to introduce it. There are also fears that the government could use its powers to reduce borrowing limits thus obliging local authorities to repay debt and to make economies to be able to achieve this.
- 5.1.7 In most European Union countries, public sector debt is calculated to exclude that debt that is held in trading accounts and is funded by income streams such as rents for public housing rather than taxation. It is argued by some in the sector, including some Conservative local authorities, that this definition should be used in the United Kingdom and that there should be no borrowing limit on self-financed Housing Revenue Accounts. However, the government is not expected to change its policy on this matter.

5.2 Reopening the Settlement

- 5.2.1 The Government is taking powers to re-open the settlement but they only intend to use these powers if a change is made that would have a substantial, material impact on the value of the landlord's business.

5.3 Housing Benefit and Rent Rebate Subsidy Limitation

- 5.3.1 The government intends to continue with a Housing Benefit 'limit rent' calculated in accordance with the established policy of converging actual, guideline and limit rents in 2015/16. However, as part of the abolition of Housing Benefit and the introduction of the Universal Credit, the government will consider the operation of the limit rent.

5.4 Housing Revenue Account Ring Fence

- 5.4.1 The previous government had planned to issue new guidance on the Housing Revenue Account 'ring fence' that would have included a clearer definition of what should be charged to the Housing Revenue Account and General Fund. In line with their emphasis on localism, the present government does not intend to issue new guidance on the operation of the ring fence.

5.5 Regulation and Value for Money

- 5.5.1 The government expects landlords to use the new flexibility provided by Housing Revenue Account reform to drive up efficiency and value for money. They point out that the Tenant Services Authority's standard on Value for Money applies equally to Housing Associations and Local Authorities.

5.6 Disposals

- 5.6.1 The government proposes to remove the requirement to seek the specific consent of the Secretary of State to a disposal at market value except where there is a secure or introductory tenant or the disposal is to a subsidiary of the local authority.

5.7 Claw-back for Commission for New Town properties

- 5.7.1 Basildon Borough Council and Milton Keynes Borough Council both argued in their responses to the previous consultation that the contractual obligation to pay 95% of the net receipts from the sale of former New Town properties to the Homes & Communities Agency placed them at a disadvantage. The government has decided to waive the requirement for these payments to be made and Right to Buy receipts received by these two authorities will be treated in the same way as receipts at other Councils. This will come into effect with self-financing.

5.8 Stock Transfer

- 5.8.1 The government will only agree stock transfers in future if the financial terms of any proposals are clearly comparable with what self-financing would provide. Government will consider transfer proposals against the costs assumed under self-financing including dealing with backlogs, the costs of future management, maintenance and major repairs and the costs of essential refurbishment or regeneration works due to be undertaken through the proposed transfer.
- 5.8.2 There will be an expectation that councils will provide significant financial support for transfer proposals, and no assumptions of financial benefit should be made where some measure of government support may be required. Proposals will be subject to a rigorous value for money assessment.
- 5.8.3 The government is minded to abolish the Large Scale Voluntary Transfer levy and is inviting views on this. It also intends to review and re-issue the Housing Transfer Manual.
- 5.8.4 The government intends to consult and make regulations for a 'right to transfer' for tenant groups under powers contained in the Housing & Regeneration Act 2008. The regulations will require local authorities to co-operate with tenant groups that want to consider the transfer of their homes
- 5.8.5 Proposed stock transfers will continue to go through the applications process with the Homes & Communities Agency and will continue to require the Secretary of State to give their consent to disposal.
- 5.8.6 It still remains unclear, therefore, exactly where self-financing leaves the stock transfer programme. Despite the fact that ministers speak in favour of tenant-led stock transfers, the financial arrangements appear to offer neither councils nor tenants any financial advantages from stock transfer other than the avoidance of the borrowing limit.

5.9 Ensuring an Accurate Valuation and Planning the Transaction

- 5.9.1 The paper includes a section on 'ensuring an accurate valuation' that addresses the data that will be used to set up self-financing and the treatment of forecast demolitions.
- 5.9.2 The paper includes a section that contains an overview of the transaction followed by a more detailed breakdown of the key stages involved.

5.10 The Implementation Timetable

- 5.10.1 The implementation timetable is as follows:
- March 2011 – Stakeholder events with local authorities
 - March 2011 – Local authorities planning to submit evidence on demolitions are advised to contact the Communities & Local Government.
 - June 2011 – Forms sent out to collect data on stock.
 - August 2011 – Data for self-financing provided to Communities & Local Government.
 - August 2011 onwards – Data verified.

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- November 2011 onwards – Consultation on self-financing determinations.
- December 2011 onwards – Communities & Local Government and PWLB issue joint letter to each local authority setting out arrangements for loans and debt redemption.
- January 2012 – Final self-financing determinations published.
- January 2012 – Local authorities asked to tell Public Works Loans Board how much they wish to borrow.
- April 2012 – Series of transactions between Communities & Local Government and local authorities enable the start of self-financing
- Cut-off for final payments to end the subsidy system.

5.11 Capital Finance Arrangements

- 5.11.1 The Chartered Institute of Public Finance & Accountancy has published a separate document ‘Consultation on Proposed Capital Finance Arrangements under the new Housing Finance system’. Consultation closes on 28th February 2011. The consultation paper focuses on the management of debt and depreciation.
- 5.11.2 On management of debt the paper proposes that local authorities operate two loans pools in future – one for the General Fund and one for the Housing Revenue Account. It outlines how opening debt should be divided between these two pools before self-financing is introduced.
- 5.11.3 On depreciation the paper puts forward a proposal for calculating depreciation based on depreciating different building components separately in accordance with International Financial Reporting Standards. The treatment of depreciation is important as the major repairs allowance will be abolished with self-financing and it is proposed that the depreciation charge will become the sum that is transferred to the major repairs reserve to fund major repairs. Depreciation will therefore become a real cost in the housing revenue account.

6. Reaction to the Announcement

- 6.1 The Chartered Institute of Housing welcomed the paper, describing it as a significant step on the path to reform.
- 6.2 Sarah Webb, Chief Executive of the Chartered Institute of Housing said:

“The Chartered Institute of Housing has long argued that the current national Housing Revenue Account system is outdated, no longer fit for purpose and actively works against effective local management of council housing, and we look forward to next April when the system will be replaced by one based on more local choice and more local financial control.”

6.3 However, the Chartered Institute of Housing also stated that:

“The government has felt it necessary to confirm that some central controls will continue. Chartered Institute of Housing will work with government to maximise the localism within this settlement and continue to raise our concerns around setting a cap on borrowing, the continued pooling of a proportion of Right to Buy receipts and ensuring that the circumstances in which the settlement can be revisited are limited and clear. Social housing is a valuable public asset and we want to develop a system that genuinely enables authorities to manage these assets effectively.”

6.4 Cllr Milan Radulovic of Broxtowe Borough Council, and Chairman of the Association of Retained Council Housing, said:

“After years of campaigning for a fairer council housing finance system, the Association of Retained Council Housing is excited by the opportunity for greater local control. As always, the devil is in the detail and the Association of Retained Council Housing members will each be looking at how the deal stacks up for their particular communities; there is a level of debt at which authorities can make plans for the future and a level that is unsustainable.”

6.5 Paul Price, Head of Housing Services at Tendring District Council and Treasurer of the Association of Retained Council Housing, said:

“The Association of Retained Council Housing is delighted to see that detail on the level of debt and other arrangements which should allow councils to leave the unfair Housing Revenue Account subsidy system have finally been set out. Work will need to take place within each authority to calculate the impact, but this is certainly a step in the right direction... ‘However, we are dismayed at the news that 75% of receipts from right to buy sales will have to be handed to the Treasury as we believe that it is critical that right to buy receipts are kept locally. It is totally contrary to the first principles of self financing and flies in the face of localism that councils will not be able to fully manage their asset base to generate income to deliver improvements to existing stock and to assist in stock rationalisation. Whilst broadly welcoming the overall plans, we would call on the government to rethink this element of the proposals.”

6.6 The Local Government Association supports self-financing but considers ‘that Whitehall remained unwilling to let go’. A spokesman was quoted in the Local Government Chronicle as saying:

“It reaffirms the government’s intention to set arbitrary limits on councils’ borrowing... and to take three quarters of councils’ right to buy receipts.”

7. Conclusions and Next Steps

- 7.1 The government has set out its methodology for calculating the opening debt with self-financing and has updated the data. This shows an increase in debt levels at the point of self-financing both nationally and for most local authorities. The actual self-financing debt settlements will be made on the basis of a determination that will be issued in draft in November 2011 and as a final version in January 2012.
- 7.2 The government has included funding for disabled adaptations in the valuation. There will therefore be an expectation that Councils will be able to fund disabled adaptations despite the increase in debt.
- 7.3 This is a very complex document and local authorities and their tenants will need to study it closely to identify the implications for them. There will certainly be challenges created by increased levels of debt, reduced levels of decent homes funding and the borrowing cap that local authorities will have to assess.
- 7.4 Local authorities will also wish to consider the Chartered Institute of Public Finance & Accountancy consultation paper on the proposed capital finance arrangements under the new housing finance system and make representations as appropriate.

Adrian Waite
February 2011

About 'AWICS'

'AWICS' provides a full range of management consultancy and training services, principally to those who are involved in social housing.

Our mission statement is 'Independence, Integrity, Value'. We therefore provide training from an independent standpoint that is designed to help the client to achieve their objectives. We are passionate about working with the utmost integrity. We believe that we offer the best value for money that is available today!

And we publish the popular free e-newsletter for housing services – the 'AWICS Housing News'. We are big enough to make a difference – but are small enough to care!

We are currently assisting local authorities with the implementation of self-financing.

We also offer training in local authority housing finance through:

- Our series of regional seminars on 'All You Want to Know about Local Authority Housing Finance 2011'
- Our seminar on 'Developments in Local Authority Housing Finance 2011'
- Tailored in-house training

Each year we update our guide to local authority housing finance: 'All You Want to Know about Local Authority Housing Finance'. The 2011 edition is now available.

For more information about us and our services please visit our website at www.awics.co.uk or contact Adrian Waite at Adrian.waite@awics.co.uk .