

Royal Institute of British Architects

Response to the Department for Levelling Up, Housing and Communities: Technical consultation on the Infrastructure Levy June 2023

The Royal Institute of British Architects is a global professional membership body driving excellence in architecture. We serve our members and society in order to deliver better buildings and places, stronger communities and a sustainable environment. Being inclusive, ethical, environmentally aware and collaborative underpins all that we do.

RIBA welcomes the opportunity to respond to the technical consultation on the Infrastructure Levy (the Levy). We have previously welcomed the introduction of the Levy, noting that if it is to be successful, it should deliver more community infrastructure, increase certainty in planning and speed up the development management process.ⁱ

We are pleased to see the Government recognise that the existing model of developer contributions needs to be reworked, and that more stringent measures must be put in place to ensure that developers contribute to necessary infrastructure. Given that there was a clear regional imbalance in the application of Section 106 (S106) contributions, we welcome the potential equalising effect of the Levy. However, it is vital that the Levy does not inadvertently entrench existing regional disparities and all efforts must be taken to ensure that this does not occur.

The RIBA recommends that the Government:

- Takes steps to not only maintain but increase the provision for genuinely affordable housing and social housing under the Levy system. This should include a guarantee to this effect in the text of the Levelling Up and Regeneration Bill.
- Guarantees that local planning authorities have the appropriate financial resource needed for the implementation of the Levy, and that its implementation does not adversely affect the timely delivery of high-quality housing and infrastructure.
- Ensures that the Infrastructure Levy can capture similar non-financial returns as those generated by S106 and the Community Infrastructure Levy (CIL), including employment, training and community investment.
- Works to ensure that the potential of exacerbation of regional imbalances as an unintended consequence of the introduction of the Levy is comprehensively mitigated, and the outcomes of the research published alongside the Levy consultation are fully assessed.

As evident from our first recommendation, we share concerns articulated by colleagues across the sector that in its current form, the Levy may work to divert developer contributions away from affordable and social housing. In particular, we echo the issues raised in a February 2023 letterⁱⁱ to the Secretary of State for Levelling Up, Housing and Communities, signed by 18 organisations in the housing sector.

The letter calls for the Government to provide ‘evidence behind repeated...assurances that affordable and social housing supply will be protected under the new system’.ⁱⁱⁱ Further, it notes that there is currently no text in the Levelling Up and Regeneration Bill which provides explicit safeguarding of affordable and social housing. As articulated in our recommendations above, we echo the call to include a guarantee to safeguarding this provision in the text of the Bill.

In addition to this, there are clear implications in terms of the resource burden that will come with implementing the Infrastructure Levy – and which will be placed on already stretched and under-resourced planning departments.^{iv} As colleagues across the sector have noted, ‘local authority net expenditure on planning has fallen by 43% in the past decade, amounting to just 0.45% of local government budgets allocated to planning services.’^v

We have long been clear that it is imperative that the Government invests in building up the capacity of local authority planning departments, particularly with qualified design expertise. As part of RIBA’s Future Trends reporting in April 2023, when asked if delays in the processing of planning applications by local planning authorities had caused delays to projects, 47% of respondents reported delays of six months or more, up from 30% in 2021. Additionally, 22% respondents reported having to abandon projects due to delays, up from 7% in 2021.^{vi}

In order for the stated goals of the Infrastructure Levy to work in actuality, leading to a simplified planning system with more certainty around developer contributions, it is critical that planning departments are guaranteed adequate financial resource to recruit and retain the personnel needed to undertake the extra work that the Levy will create.

There are also implications for the levelling up agenda. Given the amount of regional and even local cost variations that exist, the Levy must be fair and not inadvertently create an extra cost to inhibit construction. As there is less variability in build costs than house prices nationally, there can be variability in terms of the profit and viability of projects. This may then deter the delivery of housing, or increase the amount of challenges on viability, for local planning authorities in less affluent areas.

The Construction Industry Council has argued that the proposed ‘value threshold [has] consequences for regional imbalances’^{vii}, as the value of completed developments in London and the South will remain higher. This effect, in terms of the value threshold, has a negative impact on the capacity of local planning authorities outside of these areas to benefit from the Levy funding generated. It is crucial that further thought is given to ensuring that the measures outlined in the consultation do not adversely affect meaningful levelling up.

Question 1: Do you agree that the existing CIL definition of ‘development’ should be maintained under the Infrastructure Levy, with the following excluded from the definition:

- **developments of less than 100 square metres (unless this consists of one or more dwellings and does not meet the self-build criteria)**
- **Buildings which people do not normally go into**
- **Buildings into which peoples go only intermittently for the purpose of inspecting or maintaining fixed plant or machinery**
- **Structures which are not buildings, such as pylons and wind turbines.**

Yes.

Question 2: Do you agree that developers should continue to provide certain kinds of infrastructure, including infrastructure that is incorporated into the design of the site, outside of the Infrastructure Levy?

Yes.

We understand from the text of the consultation that the distinction between integral infrastructure and Levy-funded infrastructure is, to a degree, open to interpretation and there are elements of infrastructure which may feasibly sit in both categories. While the consultation states that ‘through regulations, policy and guidance...the demarcation will be made clear and distinct’, it is not possible to answer without caveat at this stage and we would therefore welcome further guidance being made available on the precise distinction between integral and Levy-funded infrastructure as a matter of priority.

With the information provided at this stage, we would agree that developers should continue to provide infrastructure outside of the Levy. As outlined in the consultation text, new development will often require the development of new infrastructure off-site as well as on-site. However, without the criteria finalised (see Question 3) it is difficult to recommend a definitive approach to best serve the residents and communities in and adjacent to new development.

Question 3: What should be the approach for setting the distinction between integral and Levy-funded infrastructure? [see para 1.28 for options a), b), or c) or a combination of these].

Option A.

We agree that it is important to be able to distinguish how infrastructure is funded to ensure that confusion is minimised and that there are no mitigations that can be enacted to avoid necessary infrastructure being provided. While we believe that there could be benefits to each approach outlined in the consultation text, our preference would be for Option A.

As there is still a degree of uncertainty at this time in understanding what infrastructure would be distinguished as Levy-funded or integral, we prefer an approach based on principles which must be met rather than a regulatory approach as outlined in Option B. This is to ensure that, should the final definition of integral and Levy-funded infrastructure include anything that may be subject to local

context, specific local planning authorities will not find themselves disadvantaged by regulation that does not meet the needs of the development in question.

In terms of Option C, while we agree that there should be scope for the input of the expertise of the local authority, we are concerned that there is more opportunity for locally set typologies explicitly linked to the Infrastructure Delivery Strategy to be beholden to short-termism. There is also the question of creating an additional burden on local authorities at a time when they are stretched in terms of expertise, personnel and capacity. We would welcome further information on this aspect of the Infrastructure Delivery Strategy.

Question 4: Do you agree that local authorities should have the flexibility to use some of their Levy funding for non-infrastructure items such as service provision?

Yes.

We recognise that local circumstances will dictate how Infrastructure Levy funds are spent and believe that at a minimum a requirement to fully detail and explain decisions should be proposed. While in some areas there will be a clear case for direct investment in new affordable housing, in other areas investment in the renewal of existing housing, the expansion of infrastructure or environmental improvements may be more appropriate.

We have previously been clear that it is important that a new Levy is also able to capture some of the non-financial returns generated by S106 and the CIL at present including employment, training and community investment. This recommendation still stands.

Question 5: Should local authorities be expected to prioritise infrastructure and affordable housing needs before using the Levy to pay for non-infrastructure items such as local services? Should expectations be set through regulations or policy?

Yes.

While we are clear that it is vitally important to be able to comprehensively fund local services, this is not the most appropriate way to do so. Residents deserve local services to be appropriately funded through ringfenced budgets that relate to those amenities, and we are concerned that should local services be prioritised above infrastructure and housing in the application of Levy funds, this will disincentivise both government and local authorities from providing adequate funding to all core and additional services under the responsibility of the local authority in question. In essence, the Levy must be a fair way of getting developers to contribute to infrastructure and services, rather than a tax by stealth to cover for lack of funding in local authorities.

We echo the concerns of the Chartered Institute for Housing, which has noted that:

‘including affordable housing delivery in the same funding ‘pot’ as infrastructure could either leave insufficient funding for key infrastructure, or spending on infrastructure would mean less genuinely affordable housing is delivered.’^{viii}

We welcome further detail from the department on what measures will be undertaken to ensure that this does not occur.

Question 6: Are there other non-infrastructure items not mentioned in this document that this element of the Levy funds could be spent on?

It is difficult to answer this question in its totality without further clarification on what could be included. For example, under paragraph 1.29 it states that the Levy ‘allows funding to go towards the operation and maintenance of infrastructure [such as] funding the upkeep of a green space for a set period of time’. Using Levy funds towards any public realm management and maintenance would be advantageous to ensure consistency in management and maintenance, better opportunity for enforcement – which is less easily managed through private management charges – plus to extend to support new provisions such as parking with public electric vehicle infrastructure.

However, under paragraph 1.31 it is stated that revenue funding of services cannot be funded in the long-term by Levy revenues from a specific development. As such, further detail on what can be covered would be welcome. For example, proper upkeep and refurbishment to avoid premature demolition of buildings has clear environmental advantages, as well as benefits with regards to community cohesion and wellbeing.^{ix}

While we are clear that the priority of the introduction of the Levy should be to ensure the highest possible amount of genuinely affordable housing, in places that people would like to live and surrounded by the necessary infrastructure and amenities, we would be interested in whether there would be scope for the Levy to assist with maintenance. However, we are clear that the Levy should not be the only or indeed the primary source of funding for such issues.

However, given that the consultation provides limited detail on what may or may not be allowed under the conditions of regulation, we suggest that there should be further engagement on what may constitute inclusion in these criteria once the initial consultation on the Levy has been finalised.

Question 9: Do you agree that the Levy should capture value uplift associated with permitted development rights that create new dwellings?

Yes.

In terms of permitted development rights (PDR) in general, we have been clear that we are concerned at their expansion and the potential for this to undermine the quality and design of new homes. Ensuring a plan-led, rather than piecemeal, approach to planning is vital to ensure a functioning planning system, and utilising PDR particularly with regards to office/commercial to residential conversions is not a measure that we support to alleviate the housing crisis.

With this said we believe that, acting within the bounds of the current system, it is important that any schemes brought forward through PDR are subject to the Levy under the same rules that apply for dwellings and schemes which are brought forward through other mechanisms.

Question 10: Do you have views on the proposal to bring schemes brought forward through permitted development rights within scope of the Levy?

As articulated in our response to Question 9, we do not support the use of PDR and are concerned about the potential for PDR to undermine the quality and design of new homes.

The point we have made in our response to Question 9 on the importance of schemes brought forward through PDR being subject to the Levy is equally as relevant in our response to this question.

Question 11: Is there is a case for additional offsets from the Levy, beyond those identified in the paragraphs above to facilitate marginal brownfield development coming forward?

We are pleased that the consultation takes into consideration the issue of variability with regards to value uplift on brownfield land. This is a clear area of concern in terms of the viability of the Levy. This has been raised in the independent report ‘Exploring the potential effects of the proposed Infrastructure Levy’, released by the department alongside the consultation itself.

The report notes that ‘the scope for developer contributions to be exacted on residential brownfield sites is constrained to higher value settings’,^x considering that high density projects on brownfield sites usually have higher non-land development costs in comparison to low density schemes.

Further, these constraints can originate from greater risk arising from the fact that many brownfield sites are privately owned and may contain untraced services and infrastructure. This also means that many brownfield sites are more constrained in terms of access which can incur additional costs, as can additional planning obligations and constraints within which to work.

Further, the report acknowledges that there are often higher costs associated with developing brownfield land from the outset. This can be due to several factors, including having to undertake cost-intensive remediation work. The report states:

‘A significant reason for the more limited potential for developer contributions in brownfield settings (under any system) are the higher costs associated with property development in such contexts.’^{xi}

Given that research has shown that there will be less scope for local planning authorities to set variable rates and preserve viability in terms of brownfield land under the Levy, as is the case currently, it would be worth further establishing the case for allowing local authorities to provide additional offsets from the Levy. However, this would need to be as part of a negotiated discussion to guarantee that these would be realistic and deliverable.

Question 18: To what extent do you agree that a local authority should be able to require that payment of the Levy (or a proportion of the Levy liability) is made prior to site completion?

Agree.

We think there are several aspects to consider in terms of making a payment of the Levy prior to site completion. While this would bring the Levy in line with S106 contributions, which can be paid in

instalments at key intervals during the contribution of a development, it is vital to ensure that it will not have adverse effects on the cashflow of either the local authority or the developer in question.

One positive of making partial payment prior to site completion is that it will allow local authorities access to funds that they would otherwise not be able to access until site completion. This is likely to have positive repercussions for local authority cashflow which, alongside the provision of integral infrastructure by developers alongside construction, is welcome in terms of ensuring more reliable infrastructure delivery.

However, as the consultation text notes, 'developer cashflow is best supported by payment of the Levy close to completion of a phase'. Should the local authority require that payment of the Levy is made at the point of commencement of activity on site, this would require that a developer has the funds prior to building commencement. It is likely that this would have an impact on housing associations and SME developers as they are less likely to have consistent cashflow arising from multiple different projects.

As such, we would like to see further detail to ensure that early payment of the Levy would not have an adverse effect on the viability of developments brought forward by housing associations and SME developers in comparison to large developers.

Question 21: To what extent do you agree that the borrowing against Infrastructure Levy proceeds will be sufficient to ensure the timely delivery of infrastructure?

As we have previously outlined^{xii}, in principle, RIBA supports the ability to borrow against the proceeds of the Levy. In many cases, infrastructure gaps are a major source of delay in construction projects, and we welcome steps taken to alleviate this issue.

Having said this, there are clear risks attached to borrowing against Levy proceeds – should development necessitate a redesign, be delayed in terms of completion or not complete at all for reasons outside of the control of the local authority, and given the level of uncertainty that is inherent in construction and development, there are concerns that borrowing costs from private lenders may prove prohibitive.

We are also pleased to see the inclusion of the stipulation that local authorities may only borrow where they can afford to do so. As such, we welcome the clarification in the text of the consultation which states that local authorities will be able to make use of the Public Works Loan Board, which we called for in our response to the 2020 Planning for the Future consultation.

There is also a separate point to consider with regards to the practicalities of how this will work across local authority boundaries, particularly where there is no overall strategic direction from a combined authority. For example, if an infrastructure project is in two local authorities where one has chosen to borrow against Levy proceeds and the other has not, it is unclear what the wider repercussions will be for both delivery of infrastructure and interest repayments. We would welcome further information on what measures can be undertaken to avoid this.

Question 26: Do you agree that views of the local community should be integrated into the drafting of an Infrastructure Delivery Strategy?

Yes.

While we appreciate, as outlined in the consultation text, that community engagement can result in administrative pressure being placed on already stretched local authorities, it is vital that communities are meaningfully engaged as part of the process of drafting an Infrastructure Delivery Strategy.

As it is members of a community who will experience the impact of new infrastructure or expansion of existing infrastructure, it is best practice to ensure that they are able to engage with the process in an appropriate and accessible way. In addition to this, engagement throughout the drafting process will not only help to develop community consent for infrastructure delivery, but also provide local insight of which developers may not be aware.

As we outlined in our recent response to the department's consultation on reforms of the National Planning Policy Framework (NPPF), our members repeatedly raised that communities experience frustration when infrastructure and amenities are provided in the last stages of development. Further, several members spoke of personal experience with development schemes where not accounting for infrastructure prior to development being approved led to opposition from existing residents. Meaningful and constructive engagement throughout the development process is vital to avoiding this.

We have been clear that ensure high-quality design outcomes are delivered in accordance with community aspirations, it is critical that architects are involved in consultation processes. We do not see why this should not also be the case with regards to drafting the Infrastructure Delivery Strategy.

Question 27: Do you agree that a spending plan in the Infrastructure Delivery Strategy should include:

- **Identification of general integral infrastructure requirements**
- **Identification of infrastructure/types of infrastructure that are to be funded by the Levy**
- **Prioritisation of infrastructure and how the Levy will be spent**
- **Approach to affordable housing including right to require proportion and tenure mix**
- **Approach to any discretionary elements for the neighbourhood share**
- **Proportion for administration**
- **The anticipated borrowing that will be required to deliver infrastructure**
- **Other – please explain your answer**
- **All of the above**

All of the above.

Question 29: To what extent do you agree that it is possible to identify infrastructure requirements at the local plan stage?

As infrastructure requirements are currently identified at local plan stage, we do not see that this will change due to the introduction of the Levy.

Question 30: To what extent do you agree that the ‘right to require’ will reduce the risk that affordable housing contributions are negotiated down on viability grounds?

Agree.

We agree that the introduction of the ‘right to require’ may have a positive impact on the risk of affordable housing contributions being negotiated down on viability grounds, which is an unacceptable outcome. As colleagues in the sector have raised, S106 contributions have historically facilitated ‘a well-integrated mix of housing tenures’^{xiii} which in turn lead to mixed communities. It is crucial that the right to require should maintain this, and we welcome the clarification in the consultation text that it applies to onsite delivery.

The text of the consultation states that for this to be successful, ‘local authorities will need to engage early and work closely with affordable housing providers and developers to deliver affordable housing that best meets local need.’ We welcome further information on how the department views that this is best facilitated.

We are also concerned to see that the right to require is not present in the text of the Levelling Up and Regeneration Bill. RIBA has long been clear about the positive impact on ensuring mixed communities via mixed tenure and type and support the call of colleagues across the housing sector^{xiv} in urging the Government to include this in the text of the Bill to adequately safeguard this.

Question 31: To what extent do you agree that local authorities should charge a highly discounted/zero-rated Infrastructure Levy rate on high percentage/100% affordable housing schemes?

Like many aspects of the application of the Levy, we propose that there is further context that must be considered before applying a blanket rule such as discounting the Levy rate for new affordable housing schemes.

While in some areas there will be a clear case for direct investment in new affordable housing and this discount would be the most welcome intervention, in other areas investment in the renewal of existing housing, the expansion of infrastructure or environmental improvements may be more appropriate. In these cases, such a discount would prove counterintuitive to funding the most vital priorities.

Question 33: As per paragraph 5.13, do you think that an upper limit of where the ‘right to require’ could be set should be introduced by the government?

No.

Alternatively, do you think where the 'right to require' is set should be left to the discretion of the local authority?

Yes.

As the consultation text notes, 'in some rural areas it is not uncommon for affordable housing to constitute the entirety of contributions for developers', and in practice what would constitute an appropriate upper limit may vary depend on local context. As such, we would argue that local authorities should be involved in setting the upper limit of the right to require.

Question 34: Are you content that the Neighbourhood Share should be retained under the Infrastructure Levy?

Yes.

Question 36: The government is interested in views on arrangements for spending the neighbourhood share in unparished areas. What other bodies do you think could be in receipt of a Neighbourhood Share such areas?

Given that the purpose of the Neighbourhood Share is to enable local communities to spend Levy funds in a way that they deem appropriate, we would welcome a mechanism by which community groups receive appropriate funds.

We have long been clear that there is a strong role for community and resident engagement in matters related to local infrastructure and amenities. Apportioning the Neighbourhood Share to community groups and organisations where appropriate is a clear proactive way of increasing resident and community engagement and autonomy.

However, there must be strong safeguards to ensure that funds are spent in line with the aims of the Neighbourhood Share. As mentioned earlier in the consultation, we recognise that local circumstances will dictate how Infrastructure Levy funds are spent and as such a requirement to fully detail and explain decisions should be proposed.

We see no reason why this should not also apply in parished areas alongside funds being administered via a parish council or equivalent body.

Question 37: Should the administrative portion for the new Levy A) reflect the 5% level which exists under CIL B) be higher than this equivalent amount, C) be lower than this equivalent amount, D) Other, (please specify), or E) unsure.

B.

As the Levy will not exclusively replace S106 contributions and S106 routeways will still exist under the new system, it follows that administration will be necessary for both the Levy and the remaining S106 routeways.

As such, we are keen to see that the administrative portion takes into account the level of resource that administering both levies will take up. This is particularly pertinent given the challenge that many local authority planning departments are experiencing in terms of adequate resourcing, including for administrative functions.

Question 38: Applicants can apply for mandatory or discretionary relief for social housing under CIL. Question 31 seeks views on exempting affordable housing from the Levy. This question seeks views on retaining other countrywide exemptions. How strongly do you agree the following should be retained:

- residential annexes and extensions;
- self-build housing;

We broadly agree with exemptions being retained for residential annexes and extensions and self-build housing. As the text of the consultation states, the development of these do not generally result in new pressure on infrastructure and can enhance existing housing stock.

We welcome measures to support diversification of tenures and types of housing and such an exemption will likely be positive for this. However, this is with the caveat that such exemptions should only be applied where there will not be resulting pressure on infrastructure.

Question 40: To what extent do you agree with our proposed approach to small sites?

Agree.

Question 41: What risks will this approach pose, if any, to SME housebuilders, or to the delivery of affordable housing in rural areas?

As the definition of small sites in the consultation text is that of less than 10 units, we do not feel that the potential risks will be particularly severe. However, we would recommend a case-by-case approach to ensure that any schemes that may, as outliers, come with infrastructure requirements can contribute financially to the implementation of that infrastructure.

With regards to SME housebuilders and rural areas, retaining the ability of specific local authorities to set lower thresholds for affordable housing delivery may deter smaller housebuilders from wishing to undertake development on the site.

This is of course dependent on the context of the local planning authority in question and what is included in their local plan in terms of supporting specific development plans. In deterring development in rural areas there is a clear knock-on impact in terms of providing the necessary infrastructure for people, often those with close ties to the area, to feasibly be able to stay living in

them. There is also the potential issue of infrastructure not being available to then support further, future development from taking place.

Question 44: Do you agree that the proposed ‘test and learn’ approach to transitioning to the new Infrastructure Levy will help deliver an effective system?

We are concerned that a ‘test and learn’ approach means that built environment professionals will lack clarity with regards to how the Levy will be applied.

These concerns are echoed in the aforementioned independent report released alongside the consultation. The report states that there are a number of potential scenarios which could result from such a test and learn period: ‘some developers may rush to get applications in before the introduction of the new, unknown, system; other developers may choose to wait in the expectation that the new system will be better for them.’^{xv}

This could clearly cause periods of intense pressure on the planning system and exacerbate existing weaknesses, leading to further delays either in the near or further future.

We would also welcome further information on the impact of the test and learn approach on developments which may sit across two or more local planning authorities, some of which may have implemented the Levy and some which may be operating under the previous system of developer contributions.

Question 45: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

As the consultation text notes, ‘a higher percentage of some groups that share protected characteristics live in the social rented sector when compared to the percentage for other tenures in England’. With that in mind, the proposals raised may have an impact on people with protected characteristics should the changes result for any reason in less genuinely affordable, accessible housing provision.

‘Access for all to adequate, safe and affordable housing’^{xvi} by 2030 is a UN Sustainable Development Goal. All efforts should be taken to ensure that a commitment to securing genuinely affordable housing of all tenures and types to be available to those on all incomes is treated with the gravity that it deserves.

It is also vital to ensure that any consultation at a local level that results from the proposals outlined is held in a way which is accessible to the whole community, allowing for marginalised groups and those routinely underrepresented in the consultation process to engage meaningfully.

ⁱ <https://www.architecture.com/knowledge-and-resources/knowledge-landing-page/levelling-up-and-regeneration-bill-what-does-it-mean-for-architects>

ⁱⁱ <https://www.housing.org.uk/globalassets/files/nhf-letter-to-michael-gove-on-proposed-infrastructure-levy.pdf>

iii Ibid.

iv Ibid.

v Ibid.

vi <https://riba-prd-assets.azureedge.net/-/media/GatherContent/Business-Benchmarking/Additional-Documents/RIBA-Future-Trends-Report-Apr-2023pdf.pdf?rev=8509f9edd9b6465991e550a3a275e814>

vii <https://www.cic.org.uk/blog/planning-for-the-future-challenges-of-introducing-a-new-infrastructure-levy-need-to-be-addressed>

viii <https://cih.org/media/hunln310/committee-briefing-infrastructure-levy-july-2022.pdf>

ix <https://www.architecture.com/knowledge-and-resources/resources-landing-page/built-for-the-environment-report#available-resources>

x https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114448/2/Exploring_the_potential_effects_of_the_proposed_Infrastructure_Levy.pdf

xi Ibid.

xii <https://riba-prd-assets.azureedge.net/-/media/Files/Policy/RIBA-responses-to-consultations-and-inquiries/Planning-for-the-future-consultation-October-2020.pdf?la=en&hash=9C95FC6442AC8738EB797CCD51882F13>

xiii <https://www.housing.org.uk/globalassets/files/nhf-letter-to-michael-gove-on-proposed-infrastructure-levy.pdf>

xiv Ibid.

xv https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/114448/2/Exploring_the_potential_effects_of_the_proposed_Infrastructure_Levy.pdf

xvi <https://sdgtracker.org/cities#:~:text=Goal%3A%20By%202030%2C%20ensure%20access,basic%20services%20and%20upgrade%20slums%20>