

23 Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

Yes

- Developments undertaken through permitted development routes, particularly office to residential conversions, can generate significant levels of additional demand on infrastructure services to which they do not currently contribute.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

Yes

- Whatever mechanism is ultimately introduced to support the provision of affordable housing it is imperative that at least as much affordable housing is provided as at present to meet the high level of need and that this provision is on-site to ensure mixed and inclusive communities

24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]

Not sure

- If affordable housing were to be secured as an in-kind payment forming part of the infrastructure Levy it could remove the need to negotiate affordable housing provision through S106 on an individual application basis which may speed the process up. However, use of a standardised S106 agreement format can make this an effective solution
- The requirement for the Infrastructure Levy to cover provision of affordable housing is a concern as it could necessitate the local planning authority purchasing parcels of land within developments in order to build the affordable housing on site and to take on responsibility for the building of the majority of affordable housing, with partners

24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

Yes

- Given the level of demand for infrastructure provision will always exceed the amount of funding raised through any form of infrastructure levy and the pressure experienced by local authority budgets it is essential that a mechanism is incorporated to ensure that local authorities are protected from the risk of over paying for affordable housing provision. However, this needs to be in a form which ensures that the overall provision of affordable housing is not detrimentally affected.

24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]

Yes

- Procedures will be required to ensure clear specification of build standards for affordable homes to prevent any risk of substandard homes being built that are then unsuitable for acquisition by a registered provider.
- If an in-kind delivery approach is taken it will be essential that adequate mechanisms and safeguards are put in place to ensure that on-site provision of affordable homes is effective and that no loopholes are left that risk reducing the level of provision or recreate the need for case by case negotiation.