

Written evidence submitted by Shelter

Housing, Communities and Local Government Committee Inquiry into 'Long-term delivery of social and affordable rented housing'

1. About Shelter

- 1.1. Shelter is the UK's largest housing and homelessness charity. We help millions of people every year struggling with bad housing or homelessness through our advice, support and legal services. And we campaign to make sure that, one day, no one will have to turn to us for help.
- 1.2. We're here so no one has to fight bad housing or homelessness on their own.

2. Executive Summary

- 2.1. We welcome the opportunity to respond to this inquiry and the Committee's interest in supporting the increased delivery of social rent housing.
- 2.2. The housing emergency is the result of the failure of successive governments to build enough homes, in particular enough social rent homes that are affordable to those on the lowest incomes. The impact of this failure is stark:
 - **Home ownership is falling.** The English Housing Survey shows 63.5% of households owned their homes in 2017/18, down from 68.3% a decade ago.¹ Only half of today's young people are likely to ever to own their own home.²
 - The average home in England in 2018 cost **eight times more** to buy than the average annual pay packet³
 - The average share of income that young families spend on housing has **trebled over the last 50 years.**⁴
 - 277,000 people in England are now homeless, including 123,000 children.⁵
- 2.3. Fortunately, politicians of all parties now recognise the challenge that we are facing, and the government's commitment to delivering 300,000 homes a year by the mid-2020s is welcome. However, the number of homes we build is not, on its own, enough. We must also consider the type of homes that are being delivered.
- 2.4. In January 2019, Shelter's Commission on the future of social housing produced its final report: 'Building for our future'.⁶ This advocated an historic renewal in social housebuilding to resolve our housing emergency. Our independent commissioners called on the government to commit to a programme of delivering 3.1 million new social homes over the course of the next 20 years.
- 2.5. **This programme can be achieved through a combination of increased grant funding, reform of our broken land market and a focus on ensuring our planning system maximises the delivery of the homes we need most, backed up by measures to reduce and control finance costs for social development.**

¹ English Housing Survey 2017/18, Annex Table 1.1, Trends in tenure, 1980-2017-18.

² See www.shelter.org.uk/socialhousing

³ Office for National Statistics, Housing affordability in England and Wales: 2018, House price to residence-based earnings ratio dataset.

⁴ Corlett, A. and Judge, L., [Home Affront](#), Resolution Foundation, 2017.

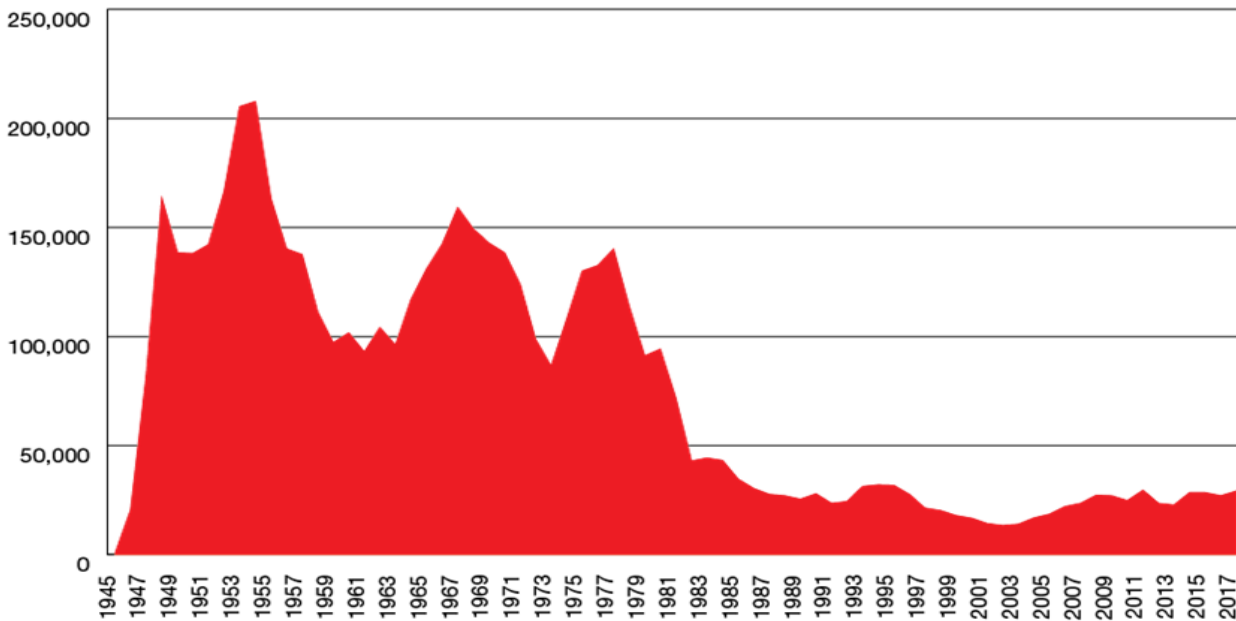
⁵ Shelter, [Homelessness in Great Britain: the numbers behind the story](#), 2018.

⁶ See www.shelter.org.uk/socialhousing

3. How can the government ensure the sustainable delivery of social and affordable rented housing to meet long-term need and contribute to the government's overall housebuilding targets?

3.1. In the three and a half decades after the end of the Second World War, councils and housing associations built 4.4 million homes, at a sustained average rate of more than 125,000 a year.⁷ This level of building was kept up through post-war reconstruction and despite recessions in the 1950s, 1960s and 1970s. While some significant errors were made along the way in terms of design and place making, in general this extended period was one of considerable success, providing genuinely affordable homes for many of those who needed them. However, that ability to deliver has been lost, and last year just 6,500 new social homes were delivered in England.

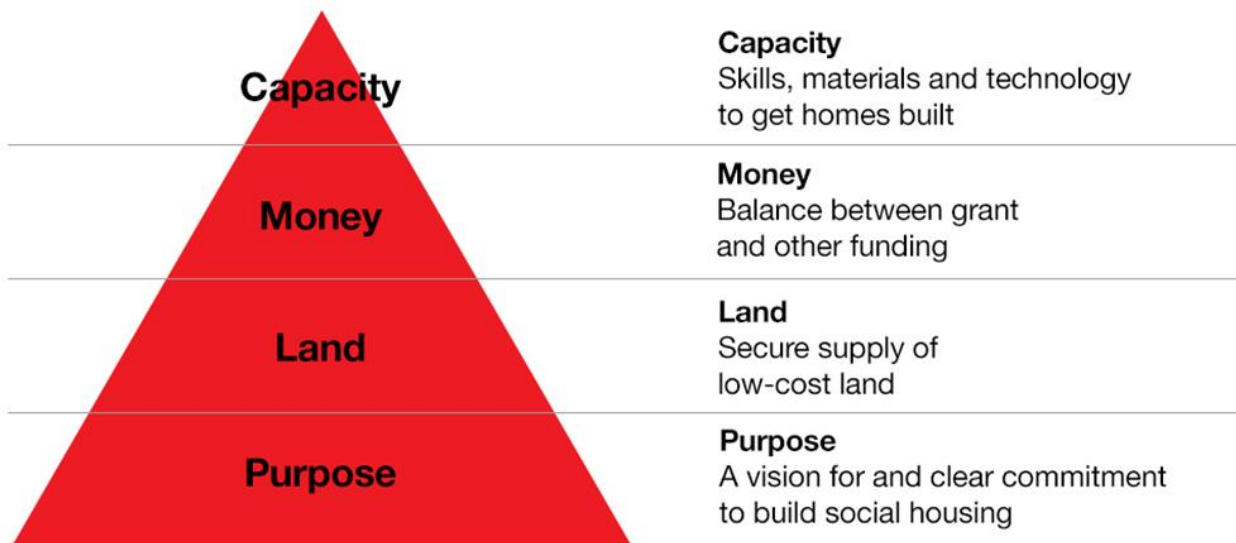
New build annual social rent and Affordable Rent housing completions since 1923



3.2. There are four key ingredients needed to build social housing. These have been the foundation of every period of successful social housebuilding in this country's history, albeit with shortages of one or another leading to compromises along the way.

⁷ MHCLG, [House building: permanent dwellings started and completed, by tenure, Live Table 244v](#)

Four key ingredients needed to build social housing



Purpose

- 3.3. Social housing has meant many different things to different people over the years. In every case the support of central government, with a clear vision for what social housing should achieve and a commitment to build, has been needed to get the land, funding and capacity in place to build at scale.
- 3.4. Recent governments have tended to see social rent housing as a residual ‘ambulance’ service, there to house only those in the very greatest need.
- 3.5. At the same time, as increasing numbers of people who would have been able to access homeownership in previous generations have found themselves frozen out of, governments have focused on the supply of ‘low-cost’ homeownership and ‘intermediate’ tenures designed for would-be first-time buyers.
- 3.6. This change in purpose for sub-market housing supply is reflected in the planning system. The National Planning Policy Framework (NPPF) definition of ‘affordable housing’ has broadened so that it now includes less affordable tenures such as shared ownership and ‘Affordable Rent’. Recent changes to the NPPF in July 2018 made it explicit that ‘low-cost’ homeownership schemes are to be prioritised over the social rent homes we need most urgently.⁸
- 3.7. While ‘Affordable Rent’ homes can meet the needs of some households in some parts of the country, overall Shelter does not believe these homes can be considered truly affordable. Social rent housing sets rents using a formula pegged to local incomes, making social housing affordable by design. By contrast, rents in ‘Affordable Rent’ housing can be set at up to 80% of local market rents – themselves increasingly unaffordable in many areas of the country. ‘Affordable’ rents for typical two-bed properties work out at 36% more expensive than social rents, amounting to £1,737 per year more on average.⁹
- 3.8. **If the government is to ensure the sustainable delivery of housing to meet the needs of low-income renters, the focus of new affordable housing supply must be switched back to social**

⁸ MHCLG, National Planning Policy Framework, February 2019, Paragraph 64

⁹ Shelter analysis of MHCLG, [Local authority housing statistics: year ending March 2018](#) and Regulator of Social Housing, [Statistical Data Returns](#)

rent housing. In 1997/98, 75% of all affordable housing delivered in England was at social rent. In 2017/18, this had fallen to just 14%.¹⁰ To support this shift, the government must also set out that more social rent housing is needed and ensure it is planned for locally. **We therefore recommend the government tightens its definition of ‘affordable housing’.** Affordability must be defined in terms of local people’s ability to afford their housing costs.

Land

- 3.9. Land is usually the single biggest cost in building homes. The total value of residential land in the UK has exploded in recent years, rising by 583% from 1995 to 2017,¹¹ and land now accounts for 70% of the cost of a market home.¹² The rising cost of land was responsible for 74% of the increase in UK house prices between 1950 and 2012.¹³
- 3.10. Today, access to land is a major constraint on social housebuilding. Forthcoming Shelter research with the Local Government Association shows the high cost of land is the single biggest barrier councils face in getting social housing built,¹⁴ a finding supported by earlier research from Janice Morphet and Ben Clifford.¹⁵ A recent Savills survey of housing associations found that ‘availability of land’ was by far the biggest constraint on them building more homes.¹⁶
- 3.11. However, things weren’t always this way. Social housebuilding in the immediate post-war period benefited from legislation that decoupled its land costs from those prevailing for market housing. This stabilised the costs of developing social housing, avoiding land market inflation and providing a secure supply of affordable land on which truly affordable housing could be built. As a result, social housing providers achieved high-quality, well-planned developments that were able to build out at record speeds, many of which are still well-loved by their residents today.
- 3.12. This situation was phased out from 1959, with the Land Compensation Act 1961 and a raft of controversial case law adding significant ‘hope value’ into the price of land.¹⁷ Compensation for landowners now includes the value of the land along with the value of any planning permissions for market housing it might get in future, making it far more expensive.
- 3.13. As a result, whenever governments have invested more public money in social housing, land prices have increased sharply because landowners have known they can charge as much as the government is willing to pay.¹⁸ Often this has forced local authorities to compromise on quality, design and density to cope with escalating land prices.
- 3.14. The levels of direct investment which would be needed to purchase land at today’s market prices and then use it to build social homes at affordable prices would be considerable. If government increased grant for social housing without also reforming the land market, then much of this investment would flow to landowners and we would continue a situation where either ever more money for land acquisition is required, or we must let design and quality suffer.

¹⁰ MHCLG, Live tables on affordable housing supply, Affordable housing completions

¹¹ ONS, [The UK national balance sheet: 2018 estimates](#), 2018, Figure 2

¹² ONS, [The UK national balance sheet: 2017 estimates](#), 2017, Figure 3

¹³ K. Knoll, M. Schularick, T. Steger, "No price like home: global house prices, 1870–2012", *The American Economic Review*, 107.2, 2017, pp. 331-353

¹⁴ Tanner, B., "[Land reform foundation for a new generation of social housing](#)", 24 Housing, 17th June 2019

¹⁵ J. Morphet and B. Clifford, [Local authority direct provision of housing](#), 2017, pp. 52-55

¹⁶ Savills Research, [The Savills Housing Sector Survey 2019](#), 2019, p.4

¹⁷ Aubrey, T., [Gathering the windfall: how changing land law can unlock England’s housing supply potential](#), 2018, p.13

¹⁸ See D. Bentley, *The Land Question: Fixing the dysfunction at the root of the housing crisis*, Civitas, 2017, p.48; N. Keohane, N. Broughton, *The Politics of Housing*, Social Market Foundation report for the National Housing Federation, 2013, p.49

3.15. Shelter welcomed the Committee's previous recommendations to improve land value capture by reforming the Land Compensation Act 1961.¹⁹ The prize of reform is great. Work from Civitas estimates that such land reform could slash 38% off the total development costs of a new scaled-up programme of social housebuilding.²⁰

Money

3.16. The lack of a sustainable and adequate source of funding is at the heart of our current inability to deliver social homes to meet need. At the beginning of the 1990s, grants covered around three-quarters of the costs of building new sub-market homes, this fell to 39% after the financial crash.²¹ The 2011–15 Affordable Homes Programme gave no grant at all to social housing, and the current Shared Ownership and Affordable Homes Programme for 2016–21 was only expanded to provide some funding for social housing in some areas in June 2018. At the same time, the costs of building new homes have escalated, driven by rising land costs.

3.17. This has had enormous consequences for social housing supply because grant rates have simply been too low for many social housing schemes to go ahead. In the absence of grant funding, social housing providers struggle to combine finance in ways that meet government and investor conditions, whilst also delivering the social housing people need. They have relied more heavily on other sources of finance, above all on borrowing.

3.18. In this context, the lifting of the cap on local authority borrowing under their Housing Revenue Accounts in 2018 was a welcome step towards local authorities playing their full part in meeting the country's housing need. However, social rent homes cannot be built on borrowing alone. While grant does not generally need to be paid back, borrowing does, and that borrowing is generally secured against existing social homes and serviced by rents. The end result is the higher, often unaffordable rents characteristic of 'Affordable Rent' housing, discussed above, which in turn require higher levels of ongoing expenditure on Housing Benefit.

3.19. This system *can* produce sub-market housing supply, but only if social housing providers and their lenders are confident that people will be able to pay the higher rents found in 'Affordable Rent' housing – in other words, that Housing Benefit expenditure will rise to meet the costs of higher rents. In recent years the increased reliance on borrowing relative to grant to provide sub-market homes for rent has been pushed to its limits. For example, in 2014, despite the most severe housing affordability crisis anywhere in the country, London's grant programme was under-subscribed.²² It offered so little grant per home that social housing providers lacked confidence that homeless households from nominations lists would be able to afford the rents the homes would have to charge given planned reductions in Housing Benefit entitlements at the time.

3.20. To build genuinely affordable homes for low-income households to rent, providers require grant. As a recent technical report from the Greater London Authority outlines, even if providers maximise every other available funding stream, asset and mechanism for delivering social housing, a subsidy gap remains.²³ Because the government has access to the cheapest finance available, capital grant is the best existing mechanism available to the country to meet this subsidy gap.

3.21. **Shelter has joined with the National Housing Association, Crisis, the Chartered Institute for Housing and the Campaign for Rural England to call for £12.8 billion of annual investment in social rent and other sub-market homes in England.** Sustained over 20 years, this investment

¹⁹ Housing, Communities and Local Government Committee, [Land Value Capture: Tenth Report of Session 2017-19](#), September 2018

²⁰ Bentley, D., [Reform of the land compensation rules: How much could it save on the cost of a public-sector housebuilding programme?](#), Briefing note, 2018

²¹ J. Chaloner, A. Dreisin and M. Pragnell, [Building New Social Rent Homes: An Economic Appraisal](#), 2015, p.11

²² Apps, P., 'Boris affordable homes programme in 'chaos', Labour says', Inside Housing, 2nd May 2014

²³ Greater London Authority, [The 2022-2032 Affordable Housing Funding Requirement for London Technical Report](#), June 2019

package would ensure the sustainable delivery of genuinely affordable housing to meet long-term need and make a significant contribution to the government's overall housebuilding targets.

- 3.22. Modelled by the National Housing Federation in partnership with the GLA and G15 in London, this programme assumes the maximisation of Section 106 and other mechanisms.
- 3.23. The average grant per home would be £183,000 for a social rent home, £99,000 for an affordable rent home, and £32,000 for a shared ownership home. These figures vary depending on the location of the homes which are needed, driven largely by the high cost of land in the areas where housing affordability pressures are most acute. As such, combining this grant programme with the land reform outlined above would reduce and control these costs over time.
- 3.24. Grant issues also act as a barrier to reaping the benefits of sub-market homes. Work by Capital Economics for Shelter's Commission into the future of social housing showed that investment in housing delivers the most positive impacts to the economy – every pound spent results in an additional £1.84 of sector activity – when compared with other industries.²⁴
- 3.25. Once social homes are built they provide a less costly option for households and government. Capital Economics constructed a model of increased social rent housing supply to assess the impact on housing benefit expenditure. Their independent analysis showed that expenditure on housing benefit had risen disproportionately to the claimant count because of a greater reliance on the private rental sector. Had the share of private renters in the housing benefit claimant count remained at levels seen in the late 1990's – around 22.6% of all claims – rather than 30% seen since the financial crisis of 2007, government would have spent £6.2 bn less in housing benefit, and tenants would have spent £7.4 bn less in rents.²⁵

Capacity

- 3.26. Finally, social housebuilding needs development capacity to actually get the homes built – that is the people, materials and technology. New players, both public and private, will be needed to replace the capacity that was lost when hundreds of SME builders went bust after the last financial crash, and local authority planning departments must be properly resourced. Modern methods of construction and other new approaches are needed to move housebuilding in England from a model of low market supply to one of significant social and market supply.
- 3.27. Countercyclical demand generated by a programme of social housing could support an expansion of capacity, laying the foundations of a successful housebuilding system capable of meeting the government's 300,000 net additions target.
- 3.28. Under the speculative housebuilding system, developers compete against each other to pay the most for land by assuming house prices will remain at current unaffordable highs. Having taken on a large upfront risk, developers then need to recoup their investment and make profit, which strongly incentivises them to build for the top of local housing markets, building as slowly as necessary to maintain prices and squeezing costs.²⁶
- 3.29. Whenever sales prices have softened, market housing starts have dropped rapidly, leading to abrupt retractions in the demand for skills and materials. In this situation, many construction workers leave the sector, never to return. As the industry has adapted to manage the risks of cyclical demand, development capacity has suffered. The prices and supply of labour and materials like bricks have become more volatile, as it is hard to predict and plan for what you will need. This is also why construction workers are more likely to be self-employed than workers in any other sector.²⁷

²⁴ Capital Economics; Increasing Investment in Social Housing, January 2019.

²⁵ Capital Economics; Increasing Investment in Social Housing, January 2019.

²⁶ Shelter, [Green Book: 50 years on](#), 2006, p.51:

²⁷ Department for Business Innovation and Skills, Combined Triennial Review of the Industry Training Boards (Construction, Engineering Construction and Film): Final report, December 2015, p.114

- 3.30. Similarly, the long-heralded shift to large scale off-site manufacture of housing has still yet to materialise, because the short-term speculative nature of the industry makes the expense and risk of investment in innovation unattractive. Investors generally do not want to commit to factories without a stable order book.
- 3.31. This system is incapable of supporting the government's target of 300,000 annual net additions. A survey of housebuilders in 2018 found that just 1% believe it will be possible to surpass the government's target of 300,000 annual net additions by 2022.²⁸
- 3.32. Investing in a major programme of social housebuilding, which sits outside the speculative housebuilding model, offers a tried and tested way to expand construction capacity, increase overall housing supply and meet the nation's housing needs.**
- 3.33. In a mixed housebuilding system, the booms and busts of market supply are to some extent stabilised by social supply. As the 'Farmer Review of the UK Construction Labour Model' found in 2016, a major programme of social housing – backed up by long-term finance - supports predictability of demand for labour, skills and materials,²⁹ resulting in a less risky operating environment for housebuilders, developers and planners.

Section 106

- 3.34. Beyond the four key ingredients, one further mechanism deserves attention: Section 106.
- 3.35. The precise number and tenure mix of sub-market housing is negotiated separately for each individual scheme via a Section 106 agreement. This can be time-consuming, costly, unpredictable and frustrating for all involved, particularly as recent years have seen ambiguity added to the process through numerous exemptions and loopholes.
- 3.36. The system is also heavily geographically imbalanced,³⁰ and makes the delivery of sub-market housing dependent on the health of the private market, undermining the important counter-cyclical role social housing has traditionally played in the housing market.
- 3.37. Clearly, Section 106 is an imperfect system, and on its own it will never be the answer to financing social homes. However, it has played an important role in the absence of a bold plan for social housebuilding, and it is imperative that the government supports local authorities to maximise delivery through this mechanism.
- 3.38. The viability loophole, which allowed developers to get out of building thousands of Section 106 homes every year, has been reformed following a Shelter campaign with the Campaign to Protect Rural England, but numerous loopholes and exemptions remain in the system.³¹
- 3.39. The removal of Section 106 on developments under ten units has slashed sub-market housing delivery on small sites, hitting rural communities more dependent on small sites for their housing supply particularly hard.³²
- 3.40. We recommend the government removes this exemption from Section 106. Where social housing cannot reasonably be provided on a small site under Section 106, a donor site should**

²⁸ Knight Frank [Housebuilding Report 2018](#), 2018

²⁹ Farmer, M., [The Farmer Review of the UK Construction Labour Model](#), 2016, p.48

³⁰ A. Lord, R. Dunning, B. Dockerill, [The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England in 2016-17](#) 2018, p.36

³¹ Grayston, R., We closed the viability loophole, Shelter, 2018 <https://blog.shelter.org.uk/2018/07/we-closed-it/>

³² Grayston, R. and Pullinger, R., [Viable Villages: Closing the Planning Loophole that Undercuts Affordable Housing the Countryside](#), 2018, p.17

be identified nearby where homes can be delivered instead. Alternatively, in some instances a commuted sum payment may be the best mechanism.

3.41. We also recommend that the government revises its approach to Permitted Development Rights, which Shelter research has calculated has been responsible for a loss of 10,000 potential affordable homes between 2015/16 and 2017/18.³³

3.42. The government should remove existing Permitted Development Rights that cover the delivery of new homes. Additionally, the government should halt its plans to extend this system to include new housing delivered through commercial demolitions and upward extensions.'

4. What should be the role of a) local authorities, b) Homes England, c) housing associations and d) other providers in this long-term delivery?

4.1. As the Letwin Review,³⁴ the 2017 Housing White Paper³⁵ and an earlier inquiry of this Committee³⁶ have all argued, a greater diversity of housebuilders and delivery models will be needed to meet housing need. Housing Associations have a vital role in social housing provision because of their access to a full range of private investment sources. Equally, there are advantages to the low-risk, low-cost delivery model used by many local authorities, who are able to access ultra-low-cost finance from the Public Works Loan Board. We believe these two principal sources of social housing provision should be seen as complementary, with the future balance of supply between the two shifting according to what will best maximise public housing supply given current financial conditions.

4.2. As set out elsewhere in this response, both the funding base and powers of local authorities should be significantly strengthened so that they can play their full part in meeting housing need, above all the need for genuinely affordable homes to rent.

4.3. Homes England and the Mayor of London should increase the focus of grant resources on the provision of social rented housing affordable to those on the lowest incomes.

4.4. Provision through new agencies such as Community Land Trusts or through self-build or 'custom build' represents a welcome expansion of delivery models and should be further encouraged, for example through land reform and grant support for social housing.

5. How does the government ensure long-term provision (a) meets the needs of tenants and (b) is adequately regulated?

Meeting the needs of tenants

5.1. **In order to meet local housing need, supply of different types of home should be based on the needs identified in (i) the local housing allocation scheme and (ii) the local homelessness strategy.** For example, if there is overcrowding among social housing tenants in the locality because of a lack of larger family social rented homes, then this should be identified in the Local Plan and be prioritised in developments. While this might deliver fewer homes than if one/two bed homes are delivered on a site, it will do more to meet severe housing need that is impacting children in the locality. Some need for one and two beds will be met through the vacancies created by overcrowded families moving to more appropriately-sized homes.

³³ For more details on Shelter's work on Permitted Development Rights see https://england.shelter.org.uk/_data/assets/pdf_file/0011/1627490/Shelter_Briefing_-_Permitted_Development_Rights.pdf

³⁴ MHCLG, *Independent Review of Build Out Rates: Annexes*, 2018, AX184

³⁵ DCLH, *Fixing our broken housing market*, 2017, p.19

³⁶ See, for example, Communities and Local Government Committee, *Capacity in the homebuilding industry: Tenth Report of Session 2016-17*, 2017, p.20

- 5.2. New social rented homes should be allocated on the basis of cumulative need, i.e. separate and cumulative points for different aspects of need, such as affordability, space, physical conditions, neighbourhood issues (for example, risks to young family members from gang-related activity). Allocation must have regard to the legal duty on local housing authorities to give 'reasonable preference' to certain categories of people in housing need (Housing Act 1996, s.167(2)), including homeless households in temporary accommodation (TA).
- 5.3. The number of households in TA has grown by 24% (from 67,480 to 83,700) over the last 10 years because of the lack of local social rented homes to move into and the unaffordability and insecurity of the private market.³⁷ If homelessness and TA use are to be reduced, then new social rented homes should be allocated to households most at risk of homelessness and to those already homeless in TA. This should include households who are 'homeless at home' because their existing social or private housing does not meet their needs, e.g. due to severe overcrowding or health and safety risks as a result of neighbourhood problems.

Adequate regulation

- 5.4. A key recommendation of Shelter's Commission into the future of social housing was the creation of a new, separate regulator of social housing. The millions of people who rent homes owned by a council or housing association need a strong regulator which is solely focused on protecting their health, safety, and well-being. When our independent commissioners spoke to social renters and other organisations, there was widespread appetite for a regulator with more 'teeth'.
- 5.5. The commission heard of the difficulties encountered by residents living in Grenfell Tower over many years in trying to get their voices heard, and how the many complaints and concerns raised about poor conditions were met with a lack of urgency. Residents talked about feeling unsafe, frustrated, angry, and disempowered prior to the fire.
- 5.6. A strong voice for social renters matters because they cannot use consumer power to ensure they receive a good service. Tenants shouldn't have to move home because they're unhappy with their landlord's services – and, even if they wanted to, the chronic lack of supply, means they have few options to move elsewhere. This is not the first time that government has needed to step in to protect consumers after perceived regulatory failing led to deaths, scandals and a loss of faith. For example, following a series of high-profile food deaths, the government separated the regulation of the food industry to set up the Food Standards Agency, ensuring people can trust that the food they buy is safe and decent. The Food Standards Agency works with local enforcement officers to ensure standards are met.
- 5.7. At the heart of these regulatory reforms was the insight that it is difficult for regulators to play a dual role, both overseeing the economic sustainability of a sector and its treatment of customers. One role will inevitably crowd out the other in terms of organisational priorities, knowledge, and skills. In social housing, consumer standards regulation has taken second place to financial regulation of social housing providers. **It is therefore crucial that a new regulator for social housing be separate, if tenants are to have faith that their concerns and needs are being considered equally.**

6. How can the government's approach to delivery best meet the different needs of individual regions and area?

- 6.1. The balance between social rent, Affordable Rent and other forms of sub-market housing needed varies significantly between and within local authority areas.
- 6.2. The level of grant subsidy required to meet the need for genuinely affordable homes for rent in different areas also varies significantly. **We recommend the government ensures that capital**

³⁷ x

grant is provided at a level which reflects the real costs of delivering genuinely affordable homes to rent in different areas.

6.3. As a first step, the government should remove restrictions on which local authority areas are able to bid for grant for social rent homes. 8.5% of the need for social rented homes identified by the National Housing Federation's modelling is in areas which are currently ineligible for social rent funding. These rules prevent social rent homes being built just across the local authority boundary from an area with high affordability pressure, or within transport or travel areas of where social rent homes are needed.

6.4. On the other hand, differences in the level of grant subsidy needed to meet housing need in different areas is driven by differences in costs of developing homes in difference areas, above all the cost of land. As work Civitas has shown, reforming the Land Compensation Act 1961 would flatten out much of this divergence.³⁸

7. What lessons can be learned from alternative approaches to social and affordable rented housing delivery in other countries and jurisdictions.

7.1. In 2018, Shelter commissioned the URBED Trust to explore international examples of the successful delivery of genuinely affordable homes to rent. We would refer the committee to the report of this work.³⁹

³⁸ Bentley, D., [Reform of the land compensation rules: How much could it save on the cost of a public-sector housebuilding programme?](#), Briefing note, 2018

³⁹ Falk, N. and Rudlin, J., [Learning from International examples of affordable housing](#), Shelter, 2019