

London's Emergency Housing Package – MHCLG

G15 Response

January 2026

About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 880,000 homes across the country, including around one in ten homes for Londoners. The G15 represents the largest providers of new affordable homes in London and accounts for approximately 15% of all affordable homes built across England. Over the last few years, our members have funded and delivered more than 56,000 new homes in partnership with the Mayor of London. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £2bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

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The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

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We welcome the Government's engagement and acknowledgment of the severe and unique challenges facing London's housing system. Housing need in the capital is acute and worsening. Demand for social and genuinely affordable rented homes continues to rise, with over 380,000 people now homeless across England and temporary accommodation costing London boroughs over £5.5m a day. At the same time, the supply of new homes has slowed sharply as high build costs, constrained grant rates, viability pressures and increasing demands on housing association balance sheets have combined to stall delivery across large parts of London's pipeline.

Against this backdrop, we support the principles underpinning the housing support package. Given the scale and immediacy of the downturn in delivery, these emergency and time-limited measures can play a role in restoring confidence, unlocking stalled schemes and preventing the further loss of delivery capacity. However, it is crucial that these measures are targeted at genuinely stalled or challenging sites, with robust protections in place to ensure affordable housing is not unnecessarily reduced, including on schemes using the new fast track route.

The success of this package should not only be judged on whether it increases output in the near term, but on whether it supports the delivery of the right homes, in the right places, and protects the long-term supply of social and affordable housing for Londoners. Therefore, affordable housing delivery, largely via the Section 106 (S.106) system, must work for all parties.

Currently, the S.106 system is under strain across multiple stages of the delivery pipeline. In some cases, affordable homes are completed or nearing completion but are slow to transfer due to weak market conditions and protracted negotiations between developers and registered providers. In others, schemes are consented or in build but face delays because affordable housing partners are unwilling or unable to take on homes on the terms offered. This is not just a question of housing association finances; registered providers are often asked to acquire homes with complex management arrangements, ongoing service and maintenance challenges, or standards that fall short of what residents rightly expect. To address these issues, we published [guidance](#) encouraging developers to engage with social landlords at an early stage, aiming to improve design, management outcomes and delivery certainty across S.106 schemes. We anticipate this package will help accelerate progress across all stages of the pipeline.

More broadly, these emergency measures must sit within a joined-up and credible housing offer for London. As we have set out in our recent submissions to the department, including the [G15 Autumn Budget](#) representation and consultation responses on [social rent convergence](#), [Minimum Energy Efficiency Standards \(MEES\)](#) and the [Decent Homes Standard \(DHS\)](#), housing associations are being asked to meet multiple, often competing demands. However, improving residents' homes, delivering

new ones and meeting net zero commitments cannot all be funded and delivered effectively from the same constrained balance sheets.

A robust rent convergence mechanism (set at £3 per week to have a significant impact on development), effective from April 2026, is key. We welcome the government's renewed commitment to reintroducing rent convergence in the Autumn Budget, and we await confirmation of its final form to enable us to plan long-term. Furthermore, a workable and funded settlement for MEES and DHS is also crucial to ensure we can adequately plan and budget. Lastly, access to low-interest government-backed loans will help to restore development capacity in the short term, until our finances have time to recover.

While the package is focused on supply, a significant challenge remains on the demand side. Weak buyer demand is slowing market-led delivery, and without careful attention to this issue, developers may remain hesitant to commit to large-scale building in the capital. Government should consider what tools are available to address this, but any intervention to stimulate demand must be carefully designed. Previous schemes such as Help to Buy were overly inflationary and distorted the housing market, rather than sustainably widening access to homeownership or improving affordability for first-time buyers.

Ensuring the shared ownership model works effectively in London is part of this. G15 would support a more targeted adjustment to shared ownership income thresholds, enabling access for higher-income key workers. The current £90,000 cap can exclude households who would otherwise benefit from the product, including dual-income key worker households. For example, two teachers on standard pay scales can exceed the income threshold within five to six years through routine pay progression, despite remaining priced out of full homeownership. Allowing a proportion of shared ownership homes to be available to higher-income key workers, potentially through a higher household income cap such as £125,000, could help absorb stalled market sale units and support off-the-shelf acquisitions, improving delivery without additional public spending. Unlike schemes such as Help to Buy, adjusting shared ownership income limits would not require further public sector investment, but could improve market absorption and delivery in current conditions.

Members also believe flexibility should be applied consistently across the housing system, particularly in relation to how housing associations finance new delivery. Greater flexibility over the use of Recycled Capital Grant Fund (RCGF) would provide an immediate and practical boost to scheme viability and help unlock stalled sites, including complex regeneration projects and schemes affected by contractor insolvency. In addition to the package, this flexibility could be applied through to 2028, allowing RCGF to be retained and used in addition to grant, and deployed alongside

building safety and decarbonisation funding. In particular, three-year RCGF balances could be used to match-fund Social Housing Decarbonisation Fund (SHDF) projects, helping to increase delivery while supporting sustainability objectives. Moreover, members also note that the current approach of reclaiming interest on three-year RCGF balances reduces the capacity at a time when rebuilding delivery is critical.

This flexibility is especially important for estate regeneration, which remains one of the most effective routes to delivering additional social and affordable homes in London while improving the quality and energy efficiency of existing stock. Current rules, including fixed grant for additionality, can constrain regeneration schemes despite their clear long-term benefits. Retaining RCGF would instead allow such schemes to progress.

This is a practical, deliverable change that aligns with the objectives of the emergency package. Ideally, these measures would be reformed in the long-term within the framework of the wider Social and Affordable Homes Programme. However, at a minimum, we ask that it be included in the emergency package for London.

Finally, members are concerned about the proposal to provide relief from borough-level contributions to Community Infrastructure Levy without corresponding changes to the Mayoral Levy. London boroughs are key delivery partners in the planning and delivery of new homes and are already operating under significant financial pressure, while managing rising demand for local infrastructure and services that support development. Any reform to the CIL needs to recognise the vital role boroughs play in enabling housing delivery and avoid further constraining their capacity to do so.

CIL payments are an important mechanism through which boroughs help fund planning capacity – something that remains a long-term issue. While recent allocations in the Autumn Budget are welcome, they do not wholly address the long-standing funding gap facing planning departments. In this context, further reductions in borough CIL risk exacerbating existing capacity constraints, especially with additional pressure following these measures. Delivering the government's ambition to accelerate housebuilding in London will require a longer-term, properly funded settlement for planning capacity that reflects the scale, complexity and volume of development in the capital.

In summary, the G15 supports decisive action to address London's housing emergency and recognises the role that temporary measures can play in kickstarting delivery. However, as currently proposed, the package leaves several fundamental barriers to delivery unresolved. Without progress on long-term funding for social landlords and fair and consistent flexibilities across the system these measures alone risk being insufficient to meet the housing needs of all Londoners.

Part I: A proposal for time-limited relief from the Community Infrastructure Levy to support housebuilding in London

Question 4: Do you agree that the relief should not apply to development on “excluded land” as defined? Please explain your answer.

Yes.

We agree that CIL relief should not apply to development on excluded land as defined in section 3.2. The land types identified, including Green Belt, Metropolitan Open Land, parks, recreation grounds, allotments, golf courses, and other locally designated open spaces, have long-standing protections in planning policy and should continue to be safeguarded. Extending relief to these sites could create incentives for applications on land with limited prospects of approval, increasing planning workload and potentially slowing decision-making on sites more suitable for development.

Excluding these land types ensures that the relief remains focused on brownfield sites, which are more likely to present viability challenges. This aligns with Government policy prioritising brownfield development and ensures that relief is directed where it can have the most impact in supporting the delivery of new homes.

Question 5: The Government welcomes views on approaches restricting relief to certain land uses – including the merits of whether the policy should apply based on established use classes, or something more bespoke

Members support restricting CIL relief to residential-led development and suggest that this could most clearly be achieved by reference to established use classes. Specifically, we support applying relief to developments falling within Use Class C2 (care homes and other communal residential accommodation) and Use Class C3 (traditional residential housing, including supported housing). This would provide a clear and well-understood framework for application, while excluding uses such as hotels, purpose-built student accommodation, and co-living schemes, which do not typically face the same viability challenges or deliver comparable housing outcomes.

We also suggest that eligibility for relief should extend to residential-led mixed-use schemes, where residential floorspace forms the majority of the development.

Restricting relief to wholly residential schemes could unintentionally disincentivise the inclusion of employment, community or other non-residential uses that are often required to secure planning consent or support placemaking objectives.

Question 6: The Government welcomes views on the application and level of the proposed borough-level CIL liability threshold, including whether this would have significant negative implications for SME builders.

We support the principle of a borough-level CIL liability threshold of £500,000 to target relief where CIL is likely to affect viability. However, a single fixed threshold at this level

risks excluding smaller schemes, including those brought forward by housing associations and SME builders, which can still face significant viability constraints.

Members consider that greater flexibility would improve the effectiveness of the proposal. This could include the introduction of lower thresholds for smaller schemes, for example in the £100,000 to £200,000 range, or a tapered approach where relief increases as affordable housing delivery increases. Such an approach would better align the mechanism with the objective of encouraging higher levels of affordable housing, rather than operating as a binary cut-off. Smaller schemes are often capable of delivering housing quicker than larger developments. Ensuring that these schemes are not inadvertently disadvantaged would support delivery rates, particularly in outer London boroughs where CIL liabilities on modest schemes can still be substantial.

We also recognise that borough-level CIL plays an important role in funding local infrastructure and services that support development, and that widespread relief could have implications for local authority finances. Members are sympathetic to the pressures faced by London boroughs, many of whom rely on CIL receipts to fund road improvements, education and public realm facilities that are essential to successful place-making. That said, targeted and proportionate relief at the borough level can still be justified where CIL is demonstrably constraining delivery, particularly for smaller and faster-moving schemes that can contribute to near-term housing supply. Striking the right balance between supporting local infrastructure funding and enabling viable housing delivery will be critical to the successful implementation of the proposed threshold.

Question 7: The Government welcomes views on the threshold applying to a development as a whole, and whether this presents any challenges for phased developments where each phase is a separate chargeable development for CIL purposes. If so, should a lower threshold apply for each phase of a phased development?

Applying the CIL threshold to a development as a whole makes sense for ensuring relief targets viability pressures across large schemes. However, for phased developments where each phase is treated as a separate CIL charge, relief should also be assessed on a per-phase basis. This will support large master-planned or regeneration schemes and ensure that phased delivery does not delay or fragment access to relief.

A lower per-phase threshold should be considered for multi-phased schemes, particularly where outline permission has already been granted, to enable multiple developers to bring forward different phases. This approach will encourage competition, allow SMEs to participate in delivery, and help ensure that homes are delivered efficiently across all phases without unnecessary delays associated with reopening planning obligations for each phase.

Members would like to see greater clarity on how the proposed mechanism would apply to schemes with existing planning consent, including those where development has already commenced and later phases are yet to come forward. In particular, it is unclear whether accessing CIL relief for future phases would require a section 73 application to vary existing section 106 obligations, which could introduce a delay of six to twelve months and undermine the objective of accelerating delivery.

We would welcome a clear and streamlined route that allows stalled or slow-moving schemes with consent, including phased schemes delivering policy-compliant affordable housing, to benefit from the relief without reopening complex planning negotiations. At the same time, the mechanism should be tightly defined to ensure it is targeted at schemes where viability constraints are genuinely preventing delivery, and does not inadvertently disincentivise schemes already delivering policy-compliant affordable housing from progressing at pace.

Question 8: The Government welcomes views on the proposal to require a minimum level of affordable housing as set out in this sub-section

We support the requirement for a minimum level of affordable housing at 20 per cent for developments to be eligible for CIL relief. As not-for-profit housing providers, G15 members always seek to maximise affordable housing delivery. However, in the current market context, supporting schemes that achieve at least 20 per cent affordable housing would represent a meaningful step, particularly given the viability pressures that might otherwise stall delivery. While not a perfect solution, it recognises the very real challenges developers face in the current London market.

It is critical that robust safeguards are in place to prevent artificial reductions in affordability or repeated planning applications that could exploit the fast-tracked process. Schemes must continue to deliver the additionality intended by Section 106 agreements, and the relief should be applied in a way that incentivises delivery above the 20 per cent threshold where feasible, rather than embedding it as new norm.

Certainty and simplicity in accessing the relief are essential. Requiring schemes to re-enter the planning system to secure eligibility, including through section 73 applications or renegotiation of section 106 obligations, would place a significant additional burden on local planning authorities. Borough planning teams are already operating under severe capacity constraints, and reopening negotiations risks delay, increased resourcing pressures and reduced take-up of the relief. We therefore welcome measures that minimise the need for repeat applications and extended legal negotiations.

In parallel, long-standing issues with the delivery of section 106 affordable housing must be addressed if this policy is to achieve its objectives. G15 members have

consistently highlighted challenges around design quality, tenure suitability, phasing and late engagement, which can undermine both viability and deliverability. We highlight the principles set out in the [G15 Guidance for Developers on Section 106 report](#), particularly the emphasis on early engagement, realistic tenure mixes and homes that meet registered provider requirements. Embedding these expectations alongside the CIL relief would strengthen outcomes and reduce friction in the system.

Supporting a minimum level of affordable housing in this way also improves the viability of acquisitions by housing associations, particularly for stalled sites, allowing grant funding to be accessed for additional affordable homes delivered beyond the original consent. Taken together, a streamlined planning approach, proportionate safeguards and improved section 106 practice will be critical to accelerating delivery while protecting public value.

Question 9: Overall, are you supportive of the qualifying criteria outlined? Please set out your views.

Members are supportive of the overall approach to the qualifying criteria; we think they strike a balance between encouraging housing delivery, maintaining affordability contributions, and protecting sensitive land.

However, our support is contingent on the detailed design and operation of the mechanism. As set out in our responses to Questions 4 to 8, the effectiveness of the qualifying criteria will depend on appropriate and flexible CIL liability thresholds that reflect viability challenges across different site types and boroughs, clear and workable treatment of phased developments to avoid delays or perverse incentives, and robust safeguards to ensure minimum affordable housing thresholds operate as a floor rather than a cap.

Question 10: The Government welcomes views and evidence on whether a time limited borough-level CIL relief in London will have the desired effect of improving viability to support housebuilding in London? As part of this, the Government would welcome case studies on the impact that borough-level CIL has on development in London.

In our experience, many housing association developments can still face significant CIL liabilities on the private sale or private rent elements of mixed-tenure schemes, even where Social Housing Relief applies to the affordable homes. This can materially affect scheme viability and the pace at which delivery can proceed. While the relief is unlikely to unlock all constrained developments on its own, it provides an important mechanism to improve cashflow and reduce upfront financial risk, particularly during the period it is available.

Question 11: Are there any specific criteria that you think could be clarified or adjusted? If so, please give your reasons why.

As stated in our answers to the previous questions, the key criteria that could be clarified or adjusted include:

- The use classes to which relief applies. Relief should be clearly restricted to residential-led developments within C2 and C3, including predominantly residential mixed-use schemes, and exclude uses such as hotels, student accommodation, and co-living. Using the established use class framework ensures consistency and avoids unnecessary complexity.
- Thresholds for CIL relief. Additional flexibility should be introduced to ensure smaller, marginal schemes, including those delivered by SMEs and housing associations, are able to access relief.
- Application to phased developments. For master-planned or regeneration schemes delivered in phases, relief should be assessed on a per-phase basis with appropriate adjustments to thresholds to avoid delays in delivery and enable participation by multiple developers.

Clarifying these criteria will improve certainty for developers and local authorities, support consistent application of relief, and maximise its impact on accelerating housing delivery across London.

Question 12: Are there any additional eligibility criteria you think should be considered for the CIL relief beyond those proposed? Are there any other observations or comments you wish to make?

No answer.

Question 13: The Government welcomes views on the proposed steps before applying for relief as set out in this sub-section. This includes views on how the grant funding mechanism may interact with the proposed CIL relief, and any circumstances where following the order/choreography set out would be difficult.

We support the proposed steps for applying for CIL relief, as they provide a clear framework for ensuring that relief is linked to the delivery of affordable housing. However, there are practical considerations that need to be clarified to avoid unintended delays or complexity.

Firstly, for hybrid planning consents where initial phases have already been implemented, it is important to provide clarity on how subsequent phases can access relief without requiring unnecessary planning modifications or section 73 applications.

We also note that the proposed approach appears to assume that additional affordable housing secured through grant funding can be reflected through existing or amended

section 106 agreements once CIL relief is available. In practice, this may not always be deliverable. Affordable housing is typically designed into schemes at an early stage, and there is often limited scope to increase provision later without redesigning the development or reducing overall housing numbers. Where on-site delivery is not feasible, this risks defaulting to in-lieu payments, which may not achieve the intended additionality and can be difficult for local authorities to deploy effectively. Clear guidance is needed on whether, and how, affordable housing above the 20 per cent threshold can qualify for relief where it cannot be physically delivered on site.

Greater flexibility is needed in the sequencing of planning, funding, and commercial decisions. In London, housing associations are often working across complex delivery structures and with multiple public and private partners, and rigid procedural requirements could delay delivery. Penalties for minor procedural errors, such as delays in serving a commencement of development notice, should be proportionate and allow developers the opportunity to remedy the issue before fines are imposed.

Providing these clarifications will help ensure that the proposed steps support delivery effectively, without creating unnecessary barriers or disincentives for developers bringing forward affordable housing in the capital.

Question 14: The Government welcomes views on the proposed application fee, the level of fee that is proposed and whether this would create any difficulties.

We support the introduction of an application fee for CIL relief where it is proportionate and focused on cost recovery. However, it is important that the fee does not undermine the viability benefits of relief, particularly for not-for-profit affordable housing providers and smaller developers.

The proposed fee of £25,000 may be appropriate for larger schemes, but could be relatively high for smaller developments, particularly those under 50 homes. A sliding scale based on scheme size or a reduced rate for smaller developments could ensure that the fee remains fair and does not act as a barrier to bringing forward schemes. It should also be clear that only a single fee is payable per relief application, rather than multiple fees for phased schemes, to avoid creating unintended administrative and financial burdens.

Furthermore, it is important to clarify that developers delivering social or affordable housing will continue to be able to apply for Social Housing Relief from CIL without charge. This ensures that the fee does not penalise schemes that are already providing affordable housing.

Question 15: The Government welcomes views and evidence on whether 50 per cent relief for qualifying schemes delivering 20 per cent affordable housing is appropriate, or whether an alternative approach should be considered.

We support the proposed 50 per cent borough-level CIL relief for schemes delivering at least 20 per cent affordable housing, as it provides a meaningful incentive to bring forward marginal developments. This level of relief strikes a balance between supporting viability and ensuring boroughs retain funding for other essential infrastructure.

It is important that developers using this relief continue to work to maximise affordable housing delivery where possible and engage early with their affordable housing partner during Section 106 negotiations. Clear guidance is needed to ensure that councils do not impose additional obligations (for example, infrastructure contributions or design conditions) in Section 106 agreements that increase costs or complexity, which could undermine the benefit of the relief and reduce the incentive effect.

We also support a sliding scale of relief, increasing up to 80 per cent for schemes delivering 35 per cent affordable housing. This approach recognises that schemes providing higher levels of affordable housing require greater support to remain viable, while ensuring alignment with borough affordable housing requirements.

The 35 per cent cap is appropriate because it maintains a realistic framework for housing associations and other registered providers to acquire stalled sites and deliver additional affordable homes beyond the Section 106 baseline, supported by grant funding. This approach maximises delivery while maintaining financial sustainability and viability.

Question 16: The Government welcomes views on whether this approach strikes an appropriate balance and provides a clear incentive for additional affordable housing to come forward.

As noted in our response to Question 15, we support the principle of targeted CIL relief for schemes delivering above 20 per cent affordable housing. In practice, many housing association schemes already benefit from Social Housing Relief, meaning the additional borough-level relief may only provide a modest financial benefit and is unlikely to fundamentally change delivery decisions on larger schemes.

It should be noted that the incentive provided by CIL relief is not the most effective stand-alone measure for driving additional affordable housing. Any reduction in CIL liability arising from existing Social Housing Relief will be applied before the proposed borough-level relief, meaning that for some schemes the financial benefit of the 50 per cent or sliding-scale relief may be modest.

Moreover, simplified methods for calculating relief will be critical to avoid unnecessary complexity and ensure that housing associations and SMEs can access the benefit efficiently.

Question 17: The Government welcomes views on the optimal levels of relief to ensure development can proceed, while maximising CIL receipts and affordable housing delivery.

We support the levels of relief proposed in the consultation. However, higher relief levels should be available for schemes that deliver increased affordable housing, particularly a greater proportion of social rent. Linking relief to the level of affordable housing delivered ensures that the policy directly supports desired outcomes, providing a clear incentive for developers and housing associations to maximise provision.

The proposed cap of 80 per cent relief for schemes delivering 35 per cent affordable housing strikes a reasonable balance. It provides sufficient incentive to encourage additional provision while avoiding excessive reductions in borough CIL receipts, which remain important for funding local infrastructure and supporting planning departments. This approach aligns with the sliding-scale structure set out under Questions 15 and 16, and ensures that relief is targeted, proportionate, and supportive of overall housing policy objectives.

Question 18: The Government welcomes views as to whether boroughs should have any discretion in relation to the relief and if so in what circumstances, and how this may work such that robust incentives for additional affordable housing remain.

We recognise the desire for boroughs to retain some discretion in applying CIL relief. However, certainty is essential to stimulate delivery and to provide clear incentives for additional affordable housing. Inconsistent application of relief across London could create complexity and delays, particularly for developments spanning multiple local authorities, and could reintroduce the risks associated with viability negotiations.

We therefore support a framework where any borough discretion is strictly limited, transparent, and tightly defined within a pan-London approach. Boroughs could have discretion in clearly specified circumstances, for example where site-specific factors make minor adjustments necessary, but this should not undermine the national framework or reduce the overall incentive to maximise affordable housing delivery. Overall, the mechanism should provide certainty for developers and housing associations while retaining targeted flexibility where genuinely required.

Question 19: The Government welcomes views on the appropriate and proportionate level of information that a developer must provide for a scheme in order to be able to qualify for the relief, ensuring that only those schemes which genuinely need the relief are able to benefit from it but avoiding the level of viability testing that would be required under the GLA's Viability Tested Route.

We support requiring developers to provide proportionate information to demonstrate that CIL relief is genuinely needed, without the full open-book viability testing required under the GLA's Viability Tested Route. Evidence should focus on high-level cost and value information, confirmation of abnormal site-specific costs, and expected affordable housing provision, avoiding detailed reporting that could delay delivery. Members recognise that a degree of scrutiny is necessary to provide assurance that relief is justified and to guard against the risk of developers overstating viability constraints.

Given the emergency nature of this relief and the use of public funding, transparency remains important. Making high-level information on the basis for relief publicly accessible would support accountability and provide reassurance that affordable housing delivery is not being unnecessarily eroded, while avoiding the administrative burden associated with detailed viability disclosure.

Question 20: The Government welcomes views on whether existing enforcement mechanisms for (i) statutory declarations (see section 5 of the Perjury Act 1911), and (ii) prosecution under the CIL Regs (see Regulation 110 of the CIL Regs) for supplying false or misleading information that is required to be provided under those Regulations, are sufficient to deter gaming of the system, or whether other deterrents should be made available? If you think these are not sufficient, please set out your reasons and views on what kinds of other deterrents may be needed, noting the Government's aims of creating a streamlined and certain process.

We consider that the existing enforcement mechanisms under the Perjury Act 1911 and Regulation 110 of the CIL Regulations are sufficient to deter gaming of the system. These mechanisms provide a clear legal framework for addressing false or misleading information, which supports the Government's aim of maintaining a streamlined and certain process.

We think additional deterrents are unlikely to improve outcomes and could introduce unnecessary complexity, delay, and administrative burden. It is important that enforcement remains targeted, proportionate, and predictable to avoid undermining the speed and certainty that this relief is intended to provide.

Question 21: The Government is interested in obtaining views on the suitability of the proposed process for securing the relief. The process is intended to provide consistent, timely and proportionate decision-making, whilst ensuring that applications for relief are robust and honest. We welcome feedback on whether these steps are practical and effective in supporting the intended outcome.

Members support the proposed process for securing CIL relief, as it is practical and capable of providing consistent decision-making. The steps outlined should ensure that applications are robust and honest while supporting delivery at pace.

The requirement for developments to commence by December 2028 provides a clear window for eligible schemes, but we note that this represents a limited timeframe. Care should be taken to ensure that the window is sufficient to encourage developers and housing associations to bring forward schemes quickly, without introducing unintended barriers to delivery.

Overall, the process is suitable and effective in principle, provided it is implemented consistently across boroughs.

Question 22: Are you supportive of the overall approach proposed to securing relief?

We are supportive of the overall approach to securing CIL relief. The proposals provide certainty and clear delivery outcomes, which are essential to help housing associations and developers bring forward schemes quickly and efficiently.

Question 23: Do you foresee any challenges with particular aspects of the approach proposed to securing relief? If so, how might these be overcome?

As set out in previous answers, while the dates for when relief will apply are clear, there is potential uncertainty around developments with existing consents, particularly phased schemes that may require Section 73 amendments to vary Section 106 conditions. This could create delays in bringing forward later phases.

We also note the risk of inconsistent interpretation between boroughs. These challenges can be mitigated through clear guidance, standardised decision-making, and explicit processes for phased developments, ensuring that relief can be applied consistently and without unnecessary delay.

Question 24: The Government welcomes views on appropriate clawback provisions to ensure schemes which benefit from the relief contribute to urgent housing need.

We strongly support the principle of clawback provisions to ensure that schemes benefiting from CIL relief continue to deliver genuine public value and affordable housing. Clawback is an important safeguard to ensure that relief is targeted appropriately and that outcomes remain aligned with the policy's objectives.

Clawback should be proportionate and apply where scheme viability improves materially over time, resulting in higher-than-anticipated developer returns. This should include, but not be limited to, situations where relief was granted on the basis of inaccurate or incomplete information. At the same time, mechanisms should allow for genuine viability risks that emerge during development, so developers are not penalised where unforeseen costs arise after relief is granted. In such cases, a viability

review overseen by the local planning authority could provide assurance that repayment is not required, while maintaining confidence in the overall approach.

Where developments increase in profitability beyond initial forecasts, additional affordable housing contributions or equivalent mechanisms could be used to ensure any uplift in value supports housing delivery rather than developer gain. This would be consistent with established approaches in some borough Section 106 agreements, where review mechanisms are used to capture improvements in viability at later stages.

Overall, clawback provisions should balance accountability with flexibility, ensuring relief supports urgent housing delivery without discouraging genuine development.

Question 25: Are you supportive of the overall approach proposed to administering the relief?

We support the overall approach proposed for administering CIL relief. The framework provides clarity and consistency, which is essential to ensure developers can access relief efficiently and housing delivery is not delayed. We emphasise that administration should remain proportionate, avoiding unnecessary complexity or procedural burdens that could undermine the viability benefits of the relief. Clear guidance and standardised processes will be important to support timely decision-making and maintain confidence in the scheme.

Question 26: Do you foresee any challenges with particular aspects of the approach proposed to administering the relief? If so, how might these be overcome?

Challenges could arise from inconsistent capacity and interpretation across boroughs, which may lead to delays or unequal application of relief. To mitigate this, clear pan-London guidance should be provided alongside standardised procedures. Regular monitoring and sharing of best practice across boroughs would help ensure a consistent approach, provide certainty for developers, and maintain the intended benefits of the relief.

Question 27: Do you foresee any challenges with the proposed implementation process?

The primary challenge will be ensuring consistent and timely implementation across all boroughs. Early clarity on the process, alongside standardised guidance and decision-making frameworks, will be critical to minimise delays and provide certainty for developers. Consistent training and communication between boroughs and the GLA will further support smooth implementation.

Question 28: The Government welcomes any views on other ways that developers could be supported through the CIL system to bring forward developments.

Additional support could include greater flexibility in the timing of CIL payments, including deferred or staged payments, to help manage cashflow for developers, particularly on complex or phased schemes. Aligning CIL relief with affordable housing grant funding could further improve scheme viability and accelerate delivery, ensuring that developments can proceed without compromising the provision of affordable homes

Part II: A proposal for permanent changes to the Town and Country Planning (Mayor of London) Order 2008 to support housing delivery in the capital

Question 29: Do you agree with the new PSI category of 50 homes or more? Please state why.

Members support the introduction of a new PSI category for schemes of 50 homes or more. This threshold reflects the strategic importance of larger residential developments in London while recognising that these schemes have a significant impact on housing supply and planning resources. We do note that smaller sites continue to make an important contribution to overall housing delivery, but setting the threshold at 50 homes provides a clear and manageable category for prioritising planning scrutiny.

We would also highlight that further analysis of past appeals for schemes in this category would be valuable. In particular, it would be useful to understand how many of the 19 applications that were appealed after refusal were successful and the additional homes delivered, as this information is currently unclear.

Question 30: Do you agree with the streamlined process for the new PSI category? Please state why

We support the streamlined process for the new PSI category. The proposed approach should help to reduce delays and uncertainty while supporting faster delivery and retaining appropriate oversight. This approach ensures that intervention by the GLA occurs only in cases where the local planning authority has refused a scheme, removing the Stage 1 consultation for small to medium-scale applications. This simplification avoids [unnecessary] statutory consultation and prevents delays in the determination period, helping to accelerate delivery.

Question 31: Do you agree that development in Category 3D of the Schedule of the Mayor of London Order 2008 should be brought into scope of the Mayor's call-in power? Please state why

We support bringing Category 3D developments into the scope of the Mayor's call-in powers. These developments are strategically and environmentally sensitive, including sites designated as Green Belt or Metropolitan Open Land. Inclusion under the Mayor's call-in powers ensures appropriate oversight, consistency in decision-making, and aligns

with the strategic planning objectives for London, while providing clarity for developers and boroughs.

Question 32: Do you have any comments on any potential impacts for you, or the group or business you represent, and on anyone with a relevant protected characteristic that might arise under the Public Sector Equality Duty as a result of the proposals in this document? Please provide details.

No answer.

Question 33: Is there anything that could be done to mitigate any impact identified?

No answer.

Question 34: Do you have any views on the implications of these proposals for the considerations of the 5 environmental principles identified in the Environment Act 2021?

No answer.