

Appendix 1 Government consultation portal questions: [London Emergency Housing Package Consultation](#)

Introduction questions

Question 1: What is your name?

Question 2: What is your email address?

Question 3: Are you replying as an individual or submitting a response on behalf of an organisation?

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

Qualifying developments

Introduces proposed partial, time-limited relief from CIL for qualifying developments in London that deliver a minimum level of affordable housing. The relief would cover 50% of the borough-level CIL liability (above a £500,000 threshold). The intention behind this will have a positive impact on scheme viability where changing inputs such as rising build costs and finance have had negative impacts on overall scheme viability.

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

The relief would primarily be applied to brownfield sites as other sites within Green Belt, Metropolitan Open Land or which is a park, or locally designated green space are considered ‘excluded land’.

City Corporation response: No comment.

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.

The relief will be limited to residential floorspace, excluding student and co-living. The intention is to prioritise housing to meet longer term housing requirements, reflecting lower commercial CIL requirements which often preferences student or co-living schemes.

Some types of affordable housing are already exempt from CIL through social housing relief, therefore this additional relief would cover schemes of 1-9 units, and a proportion of the total residential floorspace above 10 units. The £500,000 threshold means that this is most likely to capture larger-scale developments, and therefore due to limited site availability, the relief is unlikely to have any implications for residential delivery within the Square Mile. However, if sites were potentially available, detailed viability work would need to be undertaken on a scheme-by-scheme basis to determine whether this temporary relief is likely to incentivise residential development over student/co-living.

City Corporation response: The City Corporation agrees that any relief should be on established use classes, and that the relief should exclude student and co-living proposals. However, due to the existing social housing relief and £500,000 relief threshold it may be down to the detailed site-specific factors as to whether this relief would be enough to incentivise longer-term housing requirements over student or co-living products within the Square Mile. The basis of the threshold figure is also unclear.

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.

The proposal applies relief to schemes with a total liability of over £500,000 as it aims not to be too much of a burden on LPAs. In combination of the affordable housing relief and triggers this is unlikely to capture smaller scale developments, so could disproportionately benefit multiple housebuilders over SMEs.

City Corporation response: No comment.

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?

The threshold is based on the calculation of CIL liability for the development as a whole, rather than individual phases of development. The City Corporation does not tend to receive any phased residential schemes.

City Corporation response: No comment.

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

The relief is proposed to apply only to schemes delivering more than 20% affordable housing, and will be applied through amendments to the London Plan's Fast Track Route (FTR). The amendments to the FTR are likely to bring forward more schemes at pace as it would negate the need for full viability appraisal. However, it would be most likely to be down to site-specific viability appraisals to determine the impacts of the relief on residential tenure, as the social housing relief applied to the affordable elements may still have more positive viability outcomes than a 50% relief on the market residential floorspace.

Given that a majority of the current residential pipeline in the Square Mile is for student or co-living the additional 50% relief is unlikely to impact the delivery of existing permissions. However, uniquely the City Corporation is both a recipient of S106 funding from developers in the Square Mile and a developer in other boroughs. Utilising funds collected from commercial and residential schemes within the Square Mile, the Corporation delivers 100% social rent homes in other boroughs so already benefits from full social housing relief. It is unlikely that the proposed package of measures would substantially shift the balance towards on-site provision in the short

term, but any mechanism that successfully incentivised developers to do so in the unique circumstances of the Square Mile would mean that the Corporation loses the ability to collect financial contributions and deliver genuinely affordable homes elsewhere.

The financial contribution in lieu of affordable housing from residential schemes in the Square Mile is based on the calculation contained within the existing Planning Obligations SPD. This SPD is being reviewed and will reflect current viability considerations. This updated cost will need to reflect the national viability picture over the short-term expectations of the relief.

City Corporation response: The City Corporation acknowledges the minimum affordable housing requirement in the context of the relief, however given the nature of the Square Mile this is unlikely to lead to any significant changes in residential viability.

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

City Corporation response: As per previous responses the City Corporation acknowledges the changes but these changes are unlikely to have many implications for residential delivery within the Square Mile.

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.

City Corporation response: The City Corporation is hopeful that the relief will have the desired outcome of improving viability and bring forward more and faster delivery of housing, including affordable housing across London, however it is unlikely to result in many changes to residential viability within the Square Mile.

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

City Corporation response: No comment.

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?

City Corporation response: In the City Corporation's view, a flexible approach to the timing of collection and receipt of CIL funds could have viability benefits and could be the factor which brings forward more development at pace. Additionally, it is noted that the Mayor of London's CIL has not been specifically included within the scope of this proposed relief so will apply in full.

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.

The consultation suggests that prior to any CIL relief application developers should first secure a signed S106 agreement and apply for affordable housing grant to potentially boost affordable housing delivery. However, it also states that this should not preclude developers from stating their intention to apply for relief during pre-application discussions. If the intention is for only unviable schemes to be subject to the relief, as indicated in section 4.4, then this relies on developers progressing through the planning process based on a potentially unviable scheme, but with the assumption that they will be able to secure the relief at a later date. The development industry will be able to comment on whether there is an appetite for this level of risk.

City Corporation response: The City Corporation notes that the relief will be applied post issue of permission so is timed to coincide with the CIL Liability Notice. However case officers will need to have discussions at earlier stages in the planning process on the potential for securing this relief, which will be an additional requirement.

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.

Sets out a cost of £25,000 to apply for the CIL relief to cover LPA administrative burden.

City Corporation response: Acknowledge the burden on LPAs and the costs associated with covering this, however given the broad range of scales of residential developments this is likely to capture it could be more appropriate and equitable to have a sliding scale.

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.

Sets out a minimum 50% relief on total CIL liability where at least 20% affordable housing is provided.

City Corporation response: Support, subject to other comments raised regarding delivery within the Square Mile.

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.

Sets out a sliding scale of additional relief where proportion of affordable housing increases above 20%, for every additional percentage point of affordable housing, available CIL relief increases by two percentage points.

City Corporation Response: Support, subject to other comments raised.

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.

City Corporation Response: As per previous comments, amendments to CIL phasing can also have significant short term viability benefits.

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.

City Corporation Response: The City Corporation considers that should the relief be applied this should be non-discretionary to maintain transparency and set expectations from the outset.

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.

This section suggests that the intention behind the relief is to bring forward unviable schemes. Developers would need to demonstrate the viability implications of the full CIL liability, through appraisal summaries and statutory declarations that information is true and fair, but not through the submission of a full Viability Appraisal. As per comments above this potentially relies on developers progressing through the planning process based on potentially unviable schemes or to capture stalled sites. The likely implications are that potentially viable schemes could be withdrawn or amended through Section 73 applications.

City Corporation response: The City Corporation agrees that viability information required would need to be more 'light touch' to be effective.

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

The proposal would require a 'statutory declaration' that the viability information submitted was true and fair.

City Corporation response: The City Corporation agrees that there are risks associated with the approach and agrees that the 'statutory declaration' goes some way to alleviating those risks.

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.

The relief is time-limited to developments which commence from CIL regulation amendments to 31 December 2028. The intention is that the relief helps to unlock schemes with existing permission which have stalled and incentivise new schemes to come forward which may not have done so without the relief. Although not necessarily relevant to the Square Mile there is a risk that residential schemes currently in the planning process across London could be withdrawn and resubmitted based on the expectation of the relief.

City Corporation response: No further comments.

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

City Corporation response: No further comments.

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

City Corporation response: No further comments.

Question 24: The Government welcomes views on appropriate clawback provisions to ensure schemes which benefit from the relief contribute to urgent housing need. This will include clawback of relief if an incorrect/false statement is made about the viability evidence which is submitted to justify the need for relief from CIL.

Sets out aims for processing applications at pace, monitoring and administrative process and potential for clawback provisions where conditions no longer met.

City Corporation response: No further comments.

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

City Corporation response: No further comments.

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?

Sets out the UK subsidy control regime which aims to ensure that the cumulative impact of the subsidies are appropriate. Sets out that the Government will provide further detail on this prior to implementation.

City Corporation response: No comment.

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

Government's intention is to have the amended Regulations in place as soon as possible in the first half of 2026.

City Corporation response: No further comments

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

City Corporation response: As per previous comments, amendments to the CIL Regulations in relation to CIL phasing could also be beneficial in relation to the timing of CIL receipts.

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

Proposes streamlined approach to residential development of more than 50 homes where not included in other potential strategic importance (PSI) categories and a new power to call in applications on Green Belt or Metropolitan Open Land (MOL) of more than 1,000sqm.

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

This proposal means that applications of between 50 and 150 homes will now be subject to an additional 'streamlined' approach to GLA input. This is not intended to be an amendment to the call-in procedure but to introduce a new level of Mayoral input to these types of applications. The Mayor would be notified of the application and if the LPA proposes to refuse the application a modified version of Stage 2 would apply. This would require submission of details of why the LPA intends to refuse, representations, the officer report and planning conditions/S106 obligations. The Mayor would then be able to call in the application if he considers that it would have an impact on the implementation of the London Plan and there are sound planning reasons for doing so.

It is unlikely that applications of these types would arise in the Square Mile so unlikely to have any impact.

City Corporation response: The City Corporation notes the proposed new streamlined approach.

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

City Corporation response: The streamlined approach is unlikely to capture many applications within the Square Mile, however it appears proportionate.

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.

Introduces the power to call in applications of over 1,000sqm on Green Belt or MOL (as opposed to current power to direct refusal) to help ensure that higher quality Green Belt and Metropolitan Open Land can continue to be protected from speculative development and to secure high quality development on poor quality land.

City Corporation response: Supports amendments to the call in powers to allow the Mayor to maintain a strategic and consistent approach to applications on Green Belt and MOL.

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.

As set out to answers to Question 6, the implications of the change could disproportionately positively impact on multiple housebuilders by nature of the scale of developments covered. By this nature SME housebuilders would not necessarily benefit from these proposals. Although not one of the nine protected characteristics this must be considered fully in light of socio-economic impacts.

City Corporation response: The City Corporation has some concerns that the £500,000 liability threshold excludes the smaller-scale developments typically delivered by SME housebuilders.

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

City Corporation response: The liability threshold could be reduced to mitigate against the impacts on SME builders.

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?

The 5 environmental principles are:

- Embedding environmental protection - the integration principle
- prevention principle
- rectification at source principle
- polluter pays principle
- precautionary principle

City Corporation response: No comments.

Appendix 2 GLA consultation: [Support for Housebuilding LPG | London City Hall](#)

Cycle parking

Question 1: Are the proposed changes to the cycle parking standards, in conjunction with the wider package proposed by this consultation, likely to make a material difference to the viability of residential schemes while still providing sufficient cycle parking to enable sustainable growth in London and mode shift?

Applies amendments to the long stay cycle parking standards from residential development (including student and shared living) until 31 March 2028. Introduces three 'bands' of authorities, where the City of London is placed in Band 1. Long stay requirements from Table 10.2 of the London Plan and the cycle storage benchmark from Table 3.2 of the Large-scale Purpose-Built Shared Living LPG no longer apply. The changes mean that the amount of cycle parking required is based upon the number of the bedrooms, rather than the number of occupants in the dwelling. For larger residential units this means that the cycle parking requirement would be decreased from 2 spaces to 1.5 (2 beds) or 1.9 (3 beds). For student accommodation this is a slight reduction from 0.75 spaces per bedroom to 0.7.

	Long stay (Band 1)
Dwelling: Studio or one bedroom	1.0
Dwelling: Two bedroom	1.5
Dwelling: Three or more bedroom	1.9
Large-scale purpose-built shared living room	0.7
Purpose-built student accommodation bedroom	0.7

Recent surveys within the City indicate low cycle storage utilisation from students, therefore a lower level of provision from student schemes may be acceptable. The lower standard still allows for significant mode share growth from students.

City Corporation response: The City Corporation supports the proposed short-term amendments to cycle parking requirements.

Question 2: Do you consider that the guidance on flexibility and quality in sections 2.3 and 2.4 of the guidance will address development viability and cycle parking quality challenges?

Proposes changes around what can be considered as counting towards minimum long-stay cycle parking requirements. It proposes that the following can also be considered as counting towards the cycle provision:

- infrastructure for public cycle or scooter hire on the site or carriageway
- managed on-site shared cycles or scooters
- one-street cycle hangars

- storage for folding cycles
- contributions towards off-site communal cycle parking

The proposal allows greater flexibility in the use of hire or shared cycle provision as part of the cycle parking offer at student or large-scale shared living proposals. Standards may also be flexibly applied to reflect site constraints and design considerations, such as to avoid basements which significantly impact viability and accommodate small building footprints relative to floorspace. Additionally the proposal introduces further flexibility in applying the cycle design standards including options for in-building stores, purpose-built shelters, cycle storage space within dwellings and external storage solutions.

City Corporation response: The City Corporation supports flexibility of cycle parking provision.

Housing design

Question 3: The GLA welcomes views on the proposed changes to the housing design standards.

Withdraws two standards from the Housing Design Standards LPG. These are: C4.1 in relation to dual aspect home requirements, and B2.5 in relation to the number of homes accessed from each core.

City Corporation response: No comment.

Increasing housing delivery, affordable housing and time limited planning route

Question 4: The GLA welcomes views on the time-limited planning route. Do you agree that this will support the early delivery of housing development whilst also maximising affordable housing provision in the short term? Are there any changes to the approach that would more effectively achieve these objectives?

Introduces a new time-limited approach which makes amendments to Policy H4 A, H5 and H6 of the London Plan, meaning that applications on private land (and industrial land where floorspace is re-provided) providing more than 20% affordable housing can proceed via the FTR (where they also meet eligibility criteria). A gain-share viability review mechanism will be applicable if construction does not meet the fixed milestone by 31 March 2030. The Mayor is committed to maintaining the higher threshold in the medium to long term.

City Corporation response: The City Corporation notes the time-limited amendments to the fast track route within the London Plan.

Question 5: Do you agree with the proposed eligibility criteria for the time limited planning route? The GLA welcomes any views on whether this will, and how this better can, help to achieve the objective of increasing housing supply and supporting early delivery whilst also maximising affordable housing provision in the short term.

The proposals amend the 35%/50% London Plan thresholds to 20%/35%, with the higher threshold for schemes on public land and where industrial floorspace capacity is not being re-provided. The time-limited approach does not apply to Grey or Green Belt, purpose-built student accommodation or shared living, or where involves demolition of affordable housing. All planning permissions would need to be issued by 31 March 2028.

City Corporation response: The City Corporation notes the time-limited amendments to the fast-track route within the London Plan.

Question 6: Do you agree that the proposed approach to grant will help to achieve the objective of increasing housing supply and supporting early delivery, whilst also maximising affordable housing provision in the short term? To what extent will this help to support the acquisition of affordable homes secured through the planning process by Register Providers?

Schemes that commit to providing above threshold percentages of affordable housing will be eligible for grant funding, in line with updated Accelerated Funding Guidance. Grant may be sought for homes by unit above the first 10 per cent which will be nil grant, without the need for an Additionality Viability Assessment, subject to subsidy control rules.

City Corporation response: The City Corporation notes the availability of grant funding.

Question 7: The GLA welcomes views on the approach to reviews under the time limited route, including whether any further criteria should be applied which would a) incentivise early delivery, or b) help to ensure that, if reviews are triggered, additional affordable housing contributions are provided where viability improves over the lifetime of the development.

Sets out that schemes will be liable to later viability review if the first floor of the scheme has not been built by 31 March 2030. For larger schemes this will apply where the first floor and over 200 homes are built by this date. Flexibility will however be applied if delays relating to securing decisions from Building Safety Regulator. However if this milestone is not met a late review will be required once 75 per cent of homes within the scheme or within the final phase or plot are occupied. The guidance sets out some parameters of the review to be agreed with the Mayor.

City Corporation response: The City Corporation notes review mechanism trigger but does not consider the first floor to be specifically robust.

Question 8: Recognising that the substantial implementation milestone of the first floor set out in 4.6.1 may not be appropriate in all instances, are there any circumstances in which an alternative review milestone to completion of the first floor would be necessary and justified, in a way that continues to incentivise fast build out?

The completion of the first floor is to be used as the trigger which needs to be met by 31 March 2028.

City Corporation response: The City Corporation understand that the first-floor trigger will be more appropriate to some schemes rather than others, but this does favour certain forms of development types. Therefore, it would be appropriate to either have some flexibility in this, or different triggers for different development types.

Question 9: An alternative approach for phased schemes would be for boroughs, and the Mayor for referable applications, to have discretion to agree forward dates and milestones for future phases if it would support the faster build out of the scheme, which if met mean that no review is required for that phase.¹⁷ Do you agree with this and what measures would be required to ensure that this resulted in faster build out than may otherwise be the case?

Suggests that LPAs would have discretion to determine the trigger dates and milestone for larger and phased schemes.

City Corporation response: The City Corporation considers that it may be appropriate for some flexibility for larger and phased schemes.

Question 10: The GLA welcomes views on any additional measures that would support the delivery of schemes with existing planning consents which provide 35 per cent or more affordable housing. Do you agree that the time limited planning route would support schemes which have been granted planning consent but are currently stalled?

Confirms that GLA grant may be sought at or above the benchmark grant rates subject to meeting the conditions and eligibility requirements. Guidance encourages stalled projects to assess the availability of grant to increase the level of affordable housing. Applicants will be expected to seek grant and CIL relief to maintain or increase the level of affordable housing in existing section 106 agreements, any amendments should be renegotiated and agreed via a deed of variation.

City Corporation response: No comments.

Question 11: Are there any further measures that would help to prevent the level of affordable housing being reduced in consented schemes where this is not needed to enable the development to progress?

City Corporation response: No comments.

EqIA question: <https://www.london.gov.uk/media/111113/download?attachment>

Consultation question: Do you consider that any of the proposed changes set out within the SHLPG could result in additional positive or negative impacts on those with protected characteristics to those already identified? If yes, please specify which change would have the impact and which group may be affected? Resulting from the draft guidance that could affect those with protected characteristics. Do you have any additional comments on this EqIA that accompanies the SHLPG draft guidance?

The EqIA concludes that changes to cycle parking standards may negatively impact upon groups that rely on cycling, and groups that may be affected potential increase in road traffic, road danger and air pollution. For other groups with protected

characteristics, impacts are expected to be broadly neutral. Proposed change to the Housing Design Standards will have a neutral impact on older people, young children and people with a disability. For all other groups with a protected characteristic no impacts are anticipated. The introduction of a time-limited planning route aimed at supporting timely build out of new affordable housing could have a positive effect for groups with protected characteristics.

City Corporation response: No comments.