

Robin P Brown MRTPI 107 Wentworth Crescent, Hayes, Middlesex
UB31NP

21st January 2026

Dear Sir/Madam,

I am writing as an individual, a resident in Hayes, west London, informed not only by professional knowledge as a Chartered Town Planner, but from my long immersion in community-led advocacy locally and across London. This response bears in mind the issues and needs faced by everyday people expressed through community meetings and community leaders in recent years.

This response addresses both the Mayor's consultation on the draft London Plan Guidance (LPG) 'Support for Housebuilding' and the parallel MHCLG consultation on the proposed 'London Emergency Housing Package.'

As a community representative deeply invested in London's future, I object in the strongest terms to the proposed reductions in affordable housing, design standards, and CIL, as well as the expansion of Mayoral call-in powers. My objections are grounded in evidence, including that presented in the Greater London Authority's own submission of July 2025 to the Government on Planning Reform Working Paper 'Speeding Up Build Out', which contradicts the rationale behind these proposed emergency measures.

[Ref: GLA

consultation response can be found at <https://www.london.gov.uk/programmes-strategies/planning/who-we-work/working-government/mayoral-responses-government-consultations>]

1. The Central Flaw: Cutting Affordable Housing Will Not Speed Up Delivery

The core premise of the proposals, that reducing affordable housing requirements will 'kick-start' stalled developments, is fundamentally unsupported by evidence. In fact, the GLA's own analysis, submitted to the Government in July 2025, demonstrates the opposite.

Evidence: Shows high percentages of affordable housing drives faster build-out: The GLA's review of case studies under the London Plan's Fast Track Route proves that schemes with high levels of affordable housing, supported by public sector intervention (e.g. public land, grant funding), are built out faster. For example:

- The Holloway Prison redevelopment is projected to deliver 262.7 units per year with 50% affordable housing.
- Brunel Street Works delivered 217 units per year with 35% affordable housing.
- Blackhorse View delivered 100 units per year with 47% affordable housing.

The GLA states clearly that "a high level of affordable housing drives faster build-out." Slashing the requirement from 35% to 20% therefore runs counter to the Mayor's own evidence on what accelerates delivery. This policy will not solve the delivery crisis but will instead create a long-term deficit of desperately needed social and affordable homes.

2. The Real Problem: Market Structure and Developer Behaviour, Not Affordable Housing

The proposals mistakenly treat affordable housing as the barrier, rather than addressing the actual causes of the slowdown identified by the GLA.

Land banking and Price Management: The GLA identifies that "the immediate cause for slow buildout is developers managing prices by controlling the release of new homes" in an

uncompetitive market dominated by a few large players. The Mayor's own data on 300,000 unbuilt homes with planning permissions confirms this. Reducing affordable housing does nothing to address this behaviour; it simply increases developer profits on a constrained supply.

Risk of Unintended Consequences: Developers with unimplemented planning permissions are likely to pursue applications to reduce their affordable housing commitments swamping already hard-pressed planning authorities introducing further delays to processing times. [See Endnote for an example of encouragement]. This could also lead developers to submit fewer planning applications, suppressing overall supply to await further regulatory or policy concessions. Similarly, lowering affordable housing requirements may inflate land values, making the underlying viability problem worse.

3. Positive Alternatives: What the GLA in July 2025 Recommends Instead

Rather than dismantling standards, the GLA's submission outlines a positive, evidence-based strategy to speed up build-out, which I endorse generally:

Support SME Developers: "A market with more SME developers will lead to faster delivery, increased supply and lower prices." Streamlining planning for small sites and reducing regulatory burdens for SMEs would boost competition and delivery—a far better use of government focus than cutting CIL for large sites.

Promote Mixed-Tenure, Public-Led Development: The fastest build-out rates are achieved through "strong public sector intervention including master-planning, use of public sector land and retained ownership... and a public sector produced development agreement." The Mayor should expand models like the Holloway Prison and St Ann's Hospital joint ventures (delivering 60% affordable housing), not abandon them. N.B. Where I depart from the GLA is in stressing the need to exercise careful consideration over the amount of student, co-living and such like housing that is permitted for any one site, masterplan or neighbourhood to ensure socially cohesive, inclusive development results. Again, it is important to recognise that affordable housing, at up to 80% of market rate, is unaffordable for most Londoners and that to meet housing need much lower percentages of market rate, ideally at social rent level, should be secured.

Invest in Strategic Infrastructure and Public Sector Housing: The GLA states that "the delivery of new infrastructure is essential... to foster the market dynamics which support mixed-tenure development and faster build out rates." Cutting Borough CIL directly undermines this by stripping councils of funds needed for schools, transport, and parks that make new developments sustainable.

Supporting local authorities with resources, particularly financial, to promote, invest, build and/or purchase new housing stock for social rent and London Living Rent should be pursued. I recall that the Greater London Council (GLC), the predecessor to the GLA was a housing authority that, among other things, made positive additions to London's housing alongside local authorities, resulting in the high delivery rates of the post war era. [See Endnote for example of a local authority purchase 'unlocking' a stalled site].

4. Objections to Specific Proposals

A. Affordable Housing Reduction & Viability:

The drop to 20% affordable housing (12% social rent) is a catastrophic retreat from London's needs. The GLA's evidence shows that high affordability is compatible with fast delivery.

Viability assessments, already skewed in developers' favour, will be further weakened by the review clauses, allowing excessive profits to be retained.

B. CIL Relief:

Removing up to 80% of Borough CIL is a direct attack on local infrastructure funding. The GLA emphasises infrastructure's role in enabling development; this measure sabotages it. It will subsidise developer profits and inflate land values without a guaranteed increase in housing supply or affordability.

C. Erosion of Design & Safety Standards (Cycle Parking, Dual Aspect, Flats per Core):

These changes are presented without evidence of their impact on viability. They sacrifice long-term health, wellbeing, sustainability, and safety for a speculative short-term gain. The removal of the 8-flats-per-core limit raises serious fire safety concerns and ignores the lessons of Grenfell.

D. Expansion of Mayoral Call-In Powers:

Democratic local decision-making is essential for legitimacy and place-making. Extending call-in powers to smaller sites (50+ homes) and Green Belt/MOL sites centralises power and threatens local oversight, enabling inappropriate development against community wishes.

Conclusion

The 'emergency measures' are a poorly conceived, evidence-free transfer of wealth and power from the public to private developers. They will not solve the housing crisis but will exacerbate it by:

- 1. Permanently reducing the supply of affordable homes.**
- 2. Eroding the quality and safety of new homes.**
- 3. Starving communities of essential infrastructure funding.**
- 4. Undermining local democracy.**

I urge the Mayor and the Government to withdraw these proposals. Instead, you should consider adopting the constructive alternatives set out in the GLA's own analysis of July 2025:

Boost competition by actively supporting SME builders.

Accelerate public-led, mixed-tenure development on public land.

Uphold strong design and affordability standards that create sustainable communities.

Invest in infrastructure through fair developer contributions, not cut them.

London needs a long-term, strategic plan for housing, not a panic-driven fire sale of its planning standards. I expect our elected leaders to follow the evidence and act in the interests of all Londoners, not just the housebuilding lobby.

Yours faithfully,

Robin P. Brown MRTPI

Endnotes:

Encouragement to reduce Affordable Housing

A Legal Firm's reaction to proposal ([Planning Clarity Legal Ltd](#) seen 21 Jan 2026):

The consequences of the misguided proposed reforms are already manifesting themselves.

Here is an example from a legal firm:

Measures proposed such as reducing the standard percentage of affordable housing required on housing development schemes (from 35% to potentially 20%) and temporary CIL

relief should in our view provide new financial incentives to developers to bring forward the delivery of housing in the capital.

We would recommend to our developer clients with unimplemented existing housing development schemes in London with high levels of affordable housing provision to evaluate whether they might be able to obtain a 'better deal' in terms of affordable housing provision going forward (by either varying this existing provision or submitting a new scheme) and in this respect we expect to see a significant increase in the number of deeds of variations to section 106 agreements which come across our desk and please let us know if any of our lawyers can be of any assistance with this.

<https://planningclaritylegal.co.uk/2025/10/27/housing-delivery-london/>

Public investment unlocking stalled developments:

The Green Quarter (ex-Southall Gas Works), Southall in LB Ealing has presently two major unimplemented planning permissions that total over five thousand homes required to provide 35% affordable housing overall.

An earlier phase that had been stalled has been 'unlocked' by the off the plan purchase of 180 homes by Ealing Council (see article) for social rent and London living Rent at four-fifths of the price of comparable market homes in the first phase. That is a demonstration how public monies could be usefully invested to secure the homes that Londoners need.

[See <https://theviewfromw5.substack.com/p/ealing-affordable-homes-southall-green-quarter>]

END