



**Havering**  
LONDON BOROUGH

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**[www.havering.gov.uk](http://www.havering.gov.uk)**

Consultation on London Housing  
Emergency Package,  
Planning Directorate,  
Ministry of Housing, Communities  
and Local Government  
2 Marsham Street,  
London  
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## **OFFICIAL RESPONSE From the London Borough of Havering**

Dear Sir/Madam,

Please find below the London Borough of Havering (LBH) response to the Consultation on the proposed London Emergency Housing Package (Parts I and II).

While LBH recognises the need for and welcomes the intention of facilitating new homes across London in principle, it objects to the proposals as set out within the consultation in the strongest possible terms. The impact of the changes on borough funded infrastructure provision would be very significant and are completely unacceptable.

Furthermore, the proposals to increase the powers of the Mayor of London in relation to what the consultation describes as applications of 'potential strategic importance' (PSI), represents an entirely undemocratic and unjustified centralisation of planning decision making. Such a change will almost certainly increase the extent to which people feel disenfranchised by the planning process and increase local resistance to development. This is detrimental to the proper functioning of the whole planning system.

LBH are highly concerned that the CIL relief for housing is ill-conceived and unevidenced. We do not believe it should be implemented in the form proposed. Fundamentally Local CIL is required to deliver the infrastructure needed to support new housing development. London Boroughs, including LBH have already made significant investment of resources into adopting a Local CIL, using a local evidence base that reflects the local housing market, the local viability and local constraints. This centralised proposal for temporary relief undermines the careful local assessment of the local conditions that took place. We see little evidence that CIL is the root cause of housing developers viability challenges and lack of delivery. However, it is clear that CIL is needed to mitigate new housing infrastructure impacts.

It is also important to recognise that a wide range of stakeholders and residents took part in the process leading up to the adoption of our Local CIL. This change will severely undermine

their confidence in the planning system. One of the most common challenges to new housing development is, where will the new infrastructure to support it come from? National infrastructure funding streams have become ever more constrained year on year and so Local CIL plays an increasingly important role, particularly when significant growth is expected in the way Government is seeking to achieve. The proposed changes will exacerbate concerns over impacts on existing infrastructure and a lack of new infrastructure, in a backward step that will increase local opposition to development.

While we recognise that exclusions are proposed to the temporary CIL relief to housing development on land which has certain policy designations, this does not address the concerns we have identified. Of approximately £9.6 million of Local CIL collected since its adoption in Havering over £6.4 million came from schemes paying over £500,000. The impact of the proposed changes on our ability to collect CIL and fund infrastructure would therefore be extremely significant and send entirely the wrong message to those concerned about infrastructure delivery.

As a number of these large-scale schemes, making CIL payments over £500,000, are expected to come forward in the timescale envisaged for the relief, the scope for loss of CIL income at the order of millions of pounds for infrastructure delivery is very clear. There is no alternative source of funding for this locally and its long-term implication for the borough are extremely concerning.

As noted previously, we see little evidence of CIL costs being at the heart of schemes stalling and becoming unviable. However, if there is a concern that this is the case supporting councils that have gone to the effort of adopting CIL in carrying out a local review of CIL charges would be a far more appropriate and locally focused response than the one proposed in the consultation. A further option would be to consider greater flexibility on the phasing and timing of CIL payments, to support developers without penalising councils. Ultimately should the Government wish to reduce costs for developers it must do so directly via the Exchequer, rather than at the direct expense of Local Authorities.

The proposed expansion of Mayoral powers to give scope to determine applications of more than 50 homes would be enormously damaging to the long-established principle of local decision-making in planning. There is no evidence of Havering performing poorly in its processing of such schemes and the change represents a huge erosion of local democracy, making planning decisions remote from the communities they affect and disconnected with the localities they sit in.

If progressed the changes would add an additional layer of bureaucracy to the planning process, increasing the time taken for decisions to be made and introducing greater uncertainty for developers. Given the absence of evidence to show that local decision making on these types of applications is causing a problem in Havering this seems to work against the Government agenda of streamlining planning. Should they exist, issues with decision making in specific London borough could be addressed using current powers with no need for an anti-democratic blanket approach London-wide.

In principle LBH welcomes the proposal to establish a City Hall Developer Investment Fund, to prioritise funding for projects which are currently stalled and that, with the right support, have the best chance of delivering homes. However, this will not address the loss to Havering and other boroughs from the proposed CIL relief. In the absence of details on the criteria for prioritising spend from the fund it is not really possible to comment further, but this would appear more suitable as an addition to the funding generated by borough level CIL not a replacement for it.

Thank you for providing us with the opportunity to respond to these proposals.

Yours sincerely

*K. Waters*

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