

REQUEST FOR DIRECTOR DECISION – DD2639

Title: Planning for London Programme – engagement ahead of a future London Plan

Executive Summary:

The Planning for London Programme was established to facilitate early preparations for a future London Plan review after this Mayoral term, in line with the National Planning Policy Framework. It creates the opportunity to ensure that a genuine cross-section of Londoners' perspectives and experiences are at the heart of the future direction of London's built environment. The Programme will provide the space to explore longer-term spatial development and related challenges with Londoners; explore different perspectives; and support the Mayor's commitment to involve communities in planning.

This decision seeks approval of expenditure of up to £110,000 on services required to enable the Planning for London Programme to carry out engagement events with a range of stakeholders and participants.

Decision:

That the Executive Director of Good Growth approves expenditure of up to £110,000 during the financial year 2023-24 on specialist professional support required to run engagement events and report the findings.

AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Philip Graham

Position: Executive Director

Signature:



Date:

03/07/2023

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1 The London Plan 2021 provides an up-to-date policy framework for London and the Plan will not be reviewed during this Mayoral term. However, the National Planning Policy Framework (NPPF) advises that plans should be reviewed every five years. As reviews of the London Plan are a significant task which take several years, the Planning for London Programme has been established to start early preparations now. The programme will allow us to start gathering evidence; capturing views of stakeholders; and identifying issues and options that a future review of the London Plan could consider. It will collate and report on its findings, though will not make definitive recommendations as to what a future London Plan should contain. These findings will help inform the development of a new or updated Plan after the end of this Mayoral term.
- 1.2 By starting this process now, there is the opportunity to put Londoners' perspectives and experiences at the heart of the thinking about how to plan for London in the future and that will inform the next London Plan. Early, meaningful and high-quality engagement offers Londoners from all backgrounds the chance to shape the direction London takes. This is a critical part of delivering the Mayor's commitment to increase involvement of communities in the planning process and supporting London Plan Good Growth Objective 1. It is vital that this involvement includes the plan-making stage, as this has a major influence on how individual planning applications are assessed.
- 1.3 To achieve this level of ambition, however, a programme of engagement is needed that actively reaches out to a genuine cross-section of voices. This requires high-quality, easy-to-understand materials to deliver these aims in a way that is open and inclusive. By providing Londoners with the space and support to explore long-term spatial development and related challenges, a robust evidence base can be created for a future London Plan that includes the views of Londoners from all backgrounds.
- 1.4 This year's programme builds on previous engagement activity and is the last tranche of engagement before the Mayoral election and therefore Plan review in the next Mayoral term. Previous phases are as follows:
- five Talk London discussions in March 2022, with over 800 people taking part in the survey and 235 comments in the discussion threads
 - a call for evidence from December 2021 to March 2022, with this facility still open for people to bring information to the team's attention
 - deliberative events, held between December 2022 and March 2023, involving 160 participants (by invitation only) who were representative of London's communities as a whole and were all new to planning.
- 1.5 Officers now want to continue this engagement with those who wish to participate. Over 250 individuals and groups have signed up to participate to date, and it is intended to do a further notification to groups that are under-represented or have previously expressed an interest (for example through the call for evidence) but have not signed up.

Stakeholder events (£100,000)

- 1.6 Two stakeholder events have been planned for summer 2023 in London's Living Room. The events programmed will enable 10 tables with a number of participants per table, with different discussion sessions programmed over the two days. The GLA does not have the in house capacity and expertise to run these events and there are significant advantages to having discussions facilitated (and mediated as necessary) by an external and neutral third party.

- 1.7 The budget for the events covers:
- professional facilitation of the engagement sessions
 - consultant support managing the events
 - production of video materials from the day for use at future events and online engagement
 - production of a final report of the findings.
- 1.8 Agency support will be secured by calling off from an existing contract for market research services to build on the established relationship and knowledge-building with the consultancy who ran the deliberative events in 2022-23.
- 1.9 In-house resource will complement this to deliver a wider programme of engagement:
- a series of in person meetings with representatives from London's planning authorities
 - Talk London discussions
 - online engagement through the Planning webpage and planning consultation provider Bang the Table
 - further stakeholder engagement on specific topics, including in person and webinar events
 - co-designed events through Mayoral fora including the London Housing Panel and London Disability Forum and further targeted work with under-represented groups.

Procurement

- 1.10 TfL procured a call off contract from the CCS Research and Insights framework and have £250,000 allocation for the GLA to utilise if required but at sole discretion of TfL. As part of the overarching CCS Research and Insights framework there are different types of arrangements that the Buyer (TfL) can have with suppliers for example: project specific agreement, defined term agreement or a retainer agreement. The option applicable to the call off conducted by TfL is the defined term agreement: a call-off contract for a fixed period of time to work on any number of research projects. The call off contract covers a range of services that will be required during the call off term and this project is within the scope of the call off contract.
- 1.11 Strategy and Communications access this contract for the purposes of qualitative/deliberative research. The Planning for London Programme used this for the purposes of commissioning 2CV to deliver the Deliberative Research events with Londoners for Planning for London. This contract was established with 2CV following procurement processes in autumn 2022.

2. Objectives and expected outcomes

- 2.1 The objectives of the Planning for London Programme engagement are as follows:
- providing a foundation for a future London Plan review: A core purpose of the programme is to help the development and adoption of a new or updated Plan after this Mayoral term. While the programme cannot make firm recommendations at this stage, it can lay out different options and their potential impacts.
 - broadening the diversity of perspectives captured: The GLA is committed to reviewing how to further involve local communities in the planning decisions that affect them, and more broadly seeks to create a fairer city and tackle inequalities. Some groups of Londoners are under-represented in the planning process. Furthermore, the plan-making process has a major influence on what happens on individual sites. However, the plan-making stage has traditionally

relied on those who are in a position to put their views forward. The programme offers an opportunity to actively seek out a more representative breadth of perspectives. This will provide evidence that helps ground each stage of a future London Plan review in the experiences and views of all Londoners.

- increasing participation in planning: Planning can have an enormous impact on people's lives, and yet has too often been conducted in a way that many find difficult to engage with. While technical detail and documents are necessary in the development of plans, there are fundamental issues at play that could and should be brought to life. The programme offers an opportunity to develop more engaging ways of communicating the issues planners navigate every day. Doing so could also build a foundation for future engagement work, with an ultimate aim of driving greater and more diverse participation in planning at all levels (including who is inspired to go into the profession).

2.2 The expected outcomes of this phase of the engagement programme will be to:

- identify issues for a future London Plan review to consider
- inform a set of options for a future London Plan review to consider; and an assessment of their strengths and weaknesses, impacts on different groups, and views of Londoners
- provide engagement opportunities for interested parties on the longer-term challenges, the approaches to tackling them (including the trade-offs they may involve) and any mitigating actions to address concerns raised, to support a future London Plan review
- provide the foundations for greater consensus, through informed dialogue, as to the approaches and actions officers should assess in greater depth
- provide a body of evidence that local authorities can draw on in the development of local policies.

3. Equality comments

3.1 Under Section 149 of the Equality Act 2010, as a public authority, the GLA must have 'due regard' of the Public Sector Equality Duty (PSED), that is the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who have a protected characteristic and those who do not.

3.2 The proposed engagement under the Planning for London Programme creates an opportunity for anyone to participate in the early engagement on a future London Plan review. This includes specific outreach to under-represented groups including both the deliberative events held earlier in the year and bespoke and co-designed engagement with targeted groups. As per the above, the programme will identify options for a future London Plan review to consider and assess their impacts. This will enable the Equalities Impact Assessment of a future London Plan to start at the same time as the policy development process, allowing this assessment to fully inform any policy decisions in line with the PSED.

3.3 The design of the process will also centre around making the information that conveys London's longer-term challenges easily understandable to participants and accessible for a wide group of people. This is reflected in the external agency supporting this work.

4. Other considerations

Key risks and issues

4.1 Key risks and issues are summarised in the following table:

Risk	Mitigation method	Current probability (1: low; 4: high)	Current impact (1: low; 4: high)	RAG
Engagement opportunities dominated by single issue campaign groups as part of an orchestrated campaign	Whilst opportunities for everyone to contribute are welcome, discussions need to ensure the range of views can be accessed through the engagement. For in person events, this will be achieved through managing attendance, curating mixed discussion groups and holding large events at City Hall where professional security personnel are present. For online engagement, both Talk London and Bang the Table are moderated platforms with relevant safeguards in place.	2	1	Amber
Complexity/scale of the scope demands more resource than the process is able to offer	Begin scoping at the earliest possible stage with a focus on identifying well-defined questions that are: in a format that participants can meaningfully engage with; and designed with how answers might inform future policy in mind. Carefully plan the scoping exercise; allocate sufficient time for it; and consider the expertise and resource needed given the scale of the programme. Utilise and build on the resources and materials already used/developed for the programme. Further events, including webinars and in person events can be programmed to ensure coverage that meet's stakeholder expectations.	3	2	Amber
Boroughs may question the approach and their involvement	A borough officer sits on the Planning for London internal steering group. Communicate the process well, including a 'no surprises' commitment. Bespoke events being held with the boroughs.	2	1	Amber

4.2 Associated risks of not doing this phase of the Planning for London Programme, or running a programme of smaller scope, include the following:

- An inability to demonstrate meaningful, iterative and inclusive engagement, contrary to GLA priorities and compromising the ability to move forward with specific options within the London Plan review timescales (set nationally), nor to be able to evidence appropriate and commensurate engagement in the plan-making process including the external examination in public.

- This in turn would increase the length of time required for the review, with potential impacts on implementation of the policies of the London Plan 2021 beyond the five-year cycle set out in the NPPF. It would also create uncertainty for boroughs who are in the process of developing new local plans, and may have implications for how the government's Housing Delivery Test figures are calculated.
- Running a programme with considerably less resource spent on engagement would affect both the depth of engagement and the level of representation that can be achieved. While a smaller programme could still offer some support towards a future London Plan review, the risks above would still apply, at least to some degree. For instance, if the process does not explore the issues with sufficient depth or failing to provide sufficient opportunities for those who wish to participate to do so, its findings may not be seen as adequately addressing the trade-offs a future London Plan will have to navigate. Additionally, if the process fails to involve participants that are representative of London's wider population, its findings may not be broadly seen as legitimate.

Links to Mayoral strategies and priorities

- 4.3 The programme offers numerous opportunities to support Mayoral strategies and priorities. There will be particular opportunities where these strategies relate to London's places, spaces and buildings, as the location and type of development in London can influence outcomes relating to housing, transport, the environment, economic development, culture and, potentially, other aspects of Mayoral strategies and priorities.
- 4.4 The programme directly builds on the current London Plan's Good Growth objective, 'GG1 Building strong and inclusive communities', which supports 'early and inclusive engagement' with communities as well as the Mayor's commitment referred to above, at 1.2. It offers an opportunity to go considerably further in delivering against this objective. This is due to both the design of the programme – actively providing numerous opportunities to understand the views of Londoners including those who are under-represented in plan-making processes.
- 4.5 More broadly, the Mayor is required to keep statutory strategies under review. Following the next Mayoral election in 2024, whoever is elected as Mayor may wish to consider options for refreshing existing strategies and/or developing new ones. The programme offers opportunities to support and streamline a future strategy review process by considering the interrelationships between policy issues at an early stage where there are intersections with, or links to, the London Plan.

Conflicts of interest

- 4.6 There are no conflicts of interest to note for any of those involved in drafting or clearance of the decision form.

5. Financial comments

- 5.1 Approval is being sought for expenditure for external support for the Planning for London Programme – £110,000 for stakeholder engagement events as detailed within the main body of this report.
- 5.2 The estimated spend of up to £110,000 for this proposal will be funded from the London Plan Programme budget held within the Planning & Regeneration unit and approved as part of the 2023-24 GLA budget. All appropriate budget adjustments will be made.

6. Legal comments

- 6.1. The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 ("the Act"). Section 334 of the Act requires the Mayor to prepare and publish the London Plan. Sections 339 and 340 of the Act require the Mayor to keep the London Plan under review.

- 6.2. Section 30 of the Act gives the Mayor the power to do anything he considers will promote the economic development, social development and improvement of the environment in Greater London. In using this power, the Mayor is required under section 32 of the Act to carry out appropriate consultation. Section 34 of the Act gives the Mayor the authority to do anything which is calculated to facilitate or is conducive or incidental to the exercise of any of the statutory functions of the Authority. In taking this decision, this will ensure that any future review of the London Plan will be based on a comprehensive engagement and consultation exercise in line with the Mayor's powers detailed above. In taking the decisions requested of him, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic (race, disability, gender reassignment, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and marital or civil partnership status) and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.
- 6.3. If the Mayor provides the approvals sought officers must ensure that appropriate contract documentation is put in place between and executed by the GLA and contractors before commencement of such services.

7. Planned delivery approach and next steps

Activity	Timeline
Appointment of agency support for stakeholder events via existing call-off contract	June 2023
Delivery start date	June 2023
Announcement of plans for engagement	June 2023
Stakeholder events subject to this procurement	June – July 2023
Talk London discussion campaign	June – July 2023
Wider programme of stakeholder events	Q2 2023 – Q1 2024
Wider programme of online consultation	Q2 2023 – Q1 2024
Reporting on stakeholder events subject to this procurement	September 2023

Appendices and supporting papers:

None

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will either be published within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Lisa Fairmaner has drafted this report in accordance with GLA procedures and confirms the following:

✓

Assistant Director/Head of Service:

Lisa Fairmaner has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

Corporate Investment Board

A summary of this decision was reviewed by the Corporate Investment Board on 3 July 2023.

✓

INTERIM CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature:



Date:

03/07/2023