

MAYOR OF LONDON

Andrew Boff AM

Chair of the London Assembly Planning and
Regeneration Committee

C/o Memuna.Hussain@london.gov.uk

Our ref: MGLA190324-9172

Date: 9 July 2024

Dear Andrew,

Thank you for the London Assembly Planning and Regeneration Committee's final report – Shaping the Future London Plan. The summary report from the various committee sessions will help inform the next iteration of the London Plan. My response to the recommendations is set out in the annex below for each committee session.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Sadiq Khan', with a small '2' written below the name.

Sadiq Khan

Mayor of London

MAYOR OF LONDON

Annex

Mayor of London's response to the recommendations of the London Assembly Planning and Regeneration Committee's investigation on 28 November 2023 relating to how the planning system can improve accessibility for Londoners

Recommendation 1

The Mayor should establish a working group comprised of members from across local authorities in London, to collect and collate evidence on good practice on accessible design. Drawing on this evidence, the Mayor should create a good practice guide on accessible design in London, and share this with local authorities and developers.

Greater London Authority (GLA) officers are currently working on a range of projects relating to improving accessibility in London, to ensure the city's built environment is inclusive of its residents, workers, and visitors.

Outputs from the Good Growth by Design research programme, for example, the Phase 1 Report on the Women, Girls and Gender Diverse People's Safety in Public Space, and Making London Child Friendly reports, are providing a rich evidence base of best practice, case studies and pilot projects. The Regeneration team will publish a thought leadership piece later this year that is intended to prompt creative thinking around designing with inclusion in mind, and with case studies centred on embedding the experience of Disabled people in co-design. This research was prepared with the help of, and reviewed by a group of, access and inclusion experts, several of whom continue to be involved with ongoing work within the team.

Further work is being done to embed accessible design through the preparation of new London Planning Guidance (LPG) on Access and Inclusion. As part of this work, the Planning and Regeneration teams will draw on the lived experience of stakeholder groups, including those living with a disability (physical and non-visible), and those with other protected characteristics. Understanding from this engagement will inform the development of the guidance, which will assist developers in preparing planning applications that comprehensively consider inclusive design, and aid local authorities in assessing them through an inclusive design lens.

Recommendation 2

The GLA should create a training programme for Building Control Officers to ensure they are aware of how developments can comply with London Plan policies on improving accessibility for Disabled people.

The continuous professional development of borough officers, as well as wider education around accessibility requirements and inclusive design, are important aspects of ongoing efforts to promote inclusion in the built environment.

As a strategic authority, matters that arise after a planning application has been approved, including processes around Building Control, are not within the GLA's remit. The London Plan Policy D7 Accessible housing employs sections of Part M of the Building Regulations, stipulate required and optional minimum accessibility requirements relating to wheelchair accessible and adaptable housing, to encourage development to be more accessible for people with a physical disability.

MAYOR OF LONDON

While GLA Planning officers scrutinise applications and recommend conditions that specify that schemes must meet M4(3) accessibility standards pursuant to Policy D7, compliance with these conditions is the responsibility of the local planning authority, which is typically the borough.

Recommendation 3

The Mayor should mandate the creation of Local Authority Access Panels in all London boroughs to provide oversight over new planning applications. These panels should include Disabled people from the local community. In determining the remit of the Access Panels, the Mayor should consider how to ensure they are able to provide:

- guidance and critical advice on accessibility in planning applications
- suggestions on how improvements to accessibility can be made before approval is given
- oversight of changes to initial applications during the development process that may impact overall accessibility.

The Mayor can encourage London boroughs to establish Local Authority Access Panels for the review of planning applications, noting that while they can provide a great benefit in terms of accessible and inclusive design, they can be resource-intensive to create and maintain. Where boroughs opt to convene such panels, best practice suggests they comprise a diverse range of members from the local community, including people with physical and non-visible disabilities, and with intersectional identities. The precise remit of any such panel is for each local authority to determine. Officers are also keeping the GLA's own processes under review, including the resources made available to support local planning authorities.

Recommendation 4

In order to gain a better insight into the targets that need to be set to meet the housing needs of Disabled people in London, the GLA should capture and publish data on:

- A breakdown of 'wheelchair accessible' and 'wheelchair adaptable' housing being built. This data should be published in the Planning London Datahub on an annual basis.
- Affordable housing starts and completions by type and how many of these are wheelchair accessible.

This data should be published as part of the GLA's quarterly statistics on affordable housing starts and completions.

Data that the GLA is able to publish in the Planning London Datahub relies on the provision of timely, accurate data by developers and local planning authorities.

The London Plan requires the addition of conditions to secure the provision of wheelchair accessible and wheelchair adaptable housing. Ideally, the Mayor would like to publish a breakdown of wheelchair accessible and wheelchair adaptable housing, but at present a review of the application of the conditions on grants of planning permissions and gaps in the provision of data by developers means this is not possible. GLA officers are liaising with boroughs to explore the use of the conditions to address these gaps.

The GLA will aim to publish information about wheelchair accessibility for homes delivered under Affordable Housing programmes as part of its regular statistics on affordable housing starts and completions.

Recommendation 5

Using the additional data captured, the GLA should assess whether there is evidence to support an incremental increase in the 10 per cent target for wheelchair accessible housing over the course of the next London Plan.

MAYOR OF LONDON

The Mayor is aware of concerns raised by residents and stakeholders about the availability of and difficulties in securing wheelchair accessible housing in London. GLA officers will review available data, including census figures on the number of people living with disabilities; NHS data on the use of NHS-owned wheelchairs; and data published in the Planning London Datahub to consider compliance with the current policy and unmet need.

Mayor of London's response to the recommendations of the London Assembly Planning and Regeneration Committee's investigation on 30 January 2024 relating to the Metropolitan Police Service's (MPS) involvement in the built environment and our planning system, particularly in relation to Secured by Design (SBD) principles

Recommendation 1

The Mayor should commission a new research initiative to produce quantitative and qualitative analysis of SBD related decisions. The research should draw on quantitative data, such as crime rates recorded across a development. The data collected from this research should be considered as part of the wider evidence base used to set policies in the London Plan for future iterations, as well as future implementation of Secured by Design.

There is a strong academic evidence base already in existence to support Secured by Design. It has delivered and continues to deliver substantial reductions in crime, such as burglary and car crime, and addresses anti-social behaviour. There is already a good case for ensuring all new builds and redevelopments comply with Secured by Design so that we can deliver a safer London. In order to ensure this evidence base is as timely and as strong as it can be, Police Crime Prevention Initiatives have recently commissioned additional academic research via University College London to further understand the effective use of secure by design.

Recommendation 2

The Mayor should publish London Plan Guidance (LPG) on inclusive design for developers, local authorities and planning authorities to follow throughout the design process. In doing so, the LPG should collate and present examples of good practice where tensions arise between "inclusive design" and "safety." This guidance should also set out good practice on public consultations with specific groups who are typically less likely to engage with open consultation processes, such as young people.

GLA officers are in the process of preparing new LPG to support the implementation of Policy D5 Inclusive Design. The LPG is intended to provide clear, cohesive guidance drawing on the Mayor's commitment to expanding the GLA's understanding of disability and creating a city that is equitable and inclusive for all. Ensuring diverse representation, including in the design of engagement programmes and in the built environment industry itself, is essential to achieving this.

GLA officers recognise the significant value and importance of engaging with stakeholders with relevant lived experience – especially those that are seldom reached or less likely to interact with the planning system. The process of developing the LPG will reflect this and encourage local and strategic authorities to conduct more meaningful consultation, as detailed below.

The LPG will also build on design research completed through the Good Growth by Design programme, which contains a range of case studies that can be drawn on; incorporate relevant aspects of the 2014 Accessible London Supplementary Planning Guidance; and is expected to

MAYOR OF LONDON

highlight some of the more common tensions between user groups and other objectives, with support to resolve such issues through design and decision-making.

The Report raises interesting questions about how design across London impacts on inclusivity. Secured by Design would be keen to be a part of any research into this matter to ensure that guidelines do not negatively impact inclusion across any particular individuals, groups or communities.

Recommendation 3

The Mayor should implement a transparent and accountable process for communicating the Metropolitan Police Service's (MPS) suggestions or modifications to planning applications. To ensure transparency and resident awareness, we recommend establishing an internal scrutiny mechanism within the Mayor's Office for Policing and Crime (MOPAC) to review and assess the MPS' advice on developments in London. This scrutiny process should focus on maintaining accountability without necessarily making the details public, thereby upholding the confidentiality of sensitive information. Results of the scrutiny can be communicated through established channels within the Mayor's office, ensuring a responsible and informed decision-making process while respecting the need for confidentiality. To facilitate an additional layer of oversight, the London Assembly Planning and Regeneration Committee should be granted access to these results, at its discretion.

There currently is limited evidence to support the case for this proposal and it would not be practical for MOPAC to carry out such scrutiny.

Mayor of London's response to the recommendations of the London Assembly Planning and Regeneration Committee's investigation on 29 February 2024 relating to gender-informed planning

Recommendation 1

In response to this letter, the GLA should update the Planning and Regeneration Committee on what steps it is taking to gather gender sensitive and disaggregated data to inform the development of the next London Plan and explain how data is informing action on better gender-informed planning.

The Mayor notes this recommendation and will ensure GLA officers update the Committee as work on the next London Plan progresses in due course.

Recommendation 2

The GLA should build a broader knowledge base on gender diversity within the planning sector through its Placeshaping Capacity Survey 2026 by including specific questions about the gender composition of Planning Committees and Planning Officers across boroughs.

The Mayor will be undertaking the next iteration of the Placeshaping Capacity Survey in 2024, with the view to building an understanding of the capacity and capability issues facing local authorities across London. To date, the survey has built a high-level picture of the composition of London's placeshaping departments. It demonstrates that while there is an overwhelming recognition in local authorities that it is important that placeshaping staff are reflective of local populations, more needs to be done to support local authorities in capturing the data. The Mayor will continue to emphasise the need for this data and will review whether more granular data on gender is feasible within the constraints of local authority data capture.

MAYOR OF LONDON

The Mayor recognises the impact of gender representation in planning authorities and committees in mainstreaming gender inclusion in the city, and that better data is an imperative step towards greater representation.

Recommendation 3

The GLA should update the London Design Review Charter to include explicit reference to the importance of design review panels taking on board different gender perspectives. The GLA should also publish, on its website, which boroughs have signed up to the charter.

In 2022, the London Design Review Charter was updated to include 'representative and inclusive' as one of nine principles that signatories agreed to embed in their design review processes to ensure consistency in the delivery of design review across London. The Charter was also updated to include guidance on the composition of panels, noting that 'panels should be representative of the diversity of London's population'.

The uptake of the London Design Review Charter is currently published on the Mayor's Advocate Organisation, Urban Design London's (UDL) website. UDL is a key partner as it regularly convenes the design review sector in London and enables the sharing of best practice within the community.

Recommendation 4

TfL should conduct a comprehensive analysis of the data collected from its pilot women's safety audits and publish the outcomes. To enhance safety measures, these audits should be extended to cover the entirety of the TfL network and the surrounding streets. This should include the specific circumstances of local people who may have car parking needs, and different travel needs between inner and outer London.

Women's Safety Audits were initially recommended by University College London in an independent report scoping London's participation in the UN Women's Safe Cities and Safe Public Spaces Programme. As part of the Mayor's Violence Against Women and Girls Strategy, the Mayor committed to implementing the scoping report recommendations, including the piloting of women's safety audits within London.

Five locations across London have been chosen for the pilot of women's safety audits, aimed at enhancing Transport for London's (TfL) understanding of the experiences of women, girls and gender diverse people in those locations and what is needed to make them feel safer. It also provides an opportunity to bring together key stakeholders with responsibility for or interest in the location to co-design an action plan, cognisant of constrained budgets and competing priorities. In addition to giving TfL rich insight into specific locations, the pilot should also provide wider benefits for London. The project should help TfL learn about experiences and concerns across different types of locations that can be applied more broadly. Another output from the project is to create an audit tool or framework that can be used by organisations in their planning, design and management of public spaces so they are safer, and feel safer, for women, girls and gender diverse people.

Recommendation 5

The GLA should ensure the Planning for London programme examines issues including gender, accessibility and crime in the built environment in a holistic fashion. To achieve this, the GLA should ensure its engagement process creates a space in which these issues can be considered alongside one other in an intersecting framework with experts, stakeholders and those with lived experience discussing the issues together.

MAYOR OF LONDON

The Planning for London Programme convenes around a range of intersecting and related issues to facilitate engagement as described in the recommendation. It also created the space for representatives of different equalities groups to speak about the issues that they feel most strongly about, which have brought forward discussions that relate to the themes of gender, accessibility and crime, for example, referenced above.

In designing the next phase of the programme, which is likely to be towards the end of 2024, GLA officers will be mindful of this recommendation and the background investigations and points raised by the Committee's invited guests that underpinned it.

Recommendation 6

The next London Plan should include policies that make explicit reference to the importance of creating gender-diverse spaces. The GLA should prepare stand-alone guidance on creating gender-diverse spaces.

Ensuring the built environment is welcoming to and equitable for all Londoners, including women, girls, and the gender diverse, is imperative for a city that promotes inclusion, safety, and participation.

Through the Mayor's Good Growth by Design programme, the GLA has published research into Safety in Public Space for Women, Girls and Gender Diverse People and is continuing to test the principles of this research through ten live public space projects, which will help inform the next London Plan.

However, it is also noted that Local Planning Authorities and other decision-makers are all subject to the Public Sector Equality Duty in their own right. In addition, the Mayor's commitment to inclusion is clear throughout the London Plan.