

# GREATER LONDON AUTHORITY

## REQUEST FOR DIRECTOR DECISION – DD2736

### Engagement and communications plan for the London Plan high-level document

#### **Executive Summary:**

Due to the significant changes since the 2021 London Plan, including higher housing targets, a more challenging economic climate and changes in government policy since the 2024 general election, it is proposed to consult on a high-level direction of travel document in advance of the publication in draft of the new London Plan, which is in development and proposed to be consulted on by March 2025.

The purpose of the high-level document is to socialise key ideas with stakeholders and Londoners on what might be needed to meet the higher housing targets, while supporting inclusive growth and continuing to progress sustainability ambitions and to understand views as to the balance between different choices.

This decision seeks the approval of expenditure of up to £110,000 to cover the costs of engagement and communications activities related to the consultation on this high-level document.

#### **Decision:**

That the Executive Director of Good Growth approves the expenditure of up to £110,000 within the financial years 2024-25 and 2025-26 to support engagement and communications activity related to the consultation on the London Plan high-level document, which will cover the following activities:

1. procurement of services for:
  - production of digital animations
  - support for targeted engagement for groups with protected characteristics
  - support for managing consultation responses.
2. sponsored social media campaign.
3. ancillary costs of events programme.

#### **AUTHORIZING 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, Good Growth

**Signature:**



**Date:**

04/02/2025

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE**

### **Decision required – supporting report**

#### **1. Introduction and background**

- 1.1. The Mayor is required to publish a spatial development strategy (the London Plan) and to keep it under review. At any time, the Mayor may prepare and publish alterations of the London Plan or a new London Plan to replace it.
- 1.2. In order to remain up to date, as set out in the National Planning Policy Framework, the London Plan as a Spatial Development Strategy should be reviewed at least every five years to determine whether it needs updating. For the current London Plan, adopted 2 March 2021, the review must be carried out by 5 March 2026. The review will inform the preparation of the new London Plan which is in development.
- 1.3. Due to significant changes since the current London Plan was adopted, including higher housing targets, a more challenging economic climate and changes in government policy since the 2024 general election, it is proposed to consult on a high-level 'direction of travel' document in advance of consultation on the draft new London Plan which is proposed to start by March next year.
- 1.4. The purpose of the high-level document (HLD) is to socialise key ideas with stakeholders and Londoners on what might be needed to meet the higher housing targets, while supporting inclusive growth and continuing to progress sustainability ambitions and to understand views as to the balance between different choices.
- 1.5. A Mayoral Decision will be brought forward in March for the approval of the HLD for consultation.

#### **2. Objectives and expected outcomes**

- 2.1. This decision form seeks approval for expenditure of up to £110,000 to cover the costs for engagement and communication in relation to the consultation on the HLD.
- 2.2. An engagement and communications strategy has been prepared to support the publication of the HLD. There will be three main routes for engagement:
  - An events programme – including face to face and online events. A clear timetable will be developed for GLA-led events and stakeholder-led events with partners such as NLA (New London Architecture, Centre for Cities, Business LDN, London Forum etc. This will also include target events for groups with protected characteristics, with a focus on addressing gaps identified following a review of the Planning for London Programme to date, specifically the Youth Assembly and faith groups.
  - Talk London platform – this will build on the Planning for London Programme discussions undertaken in 2023. It will set out a narrative through animations and other digital assets; and will host high level discussion forums, as well as directing traffic to Engagement HQ (see below) to leave more detailed comments.
  - Engagement HQ (a planning specific engagement platform) will enable more detailed responses to be submitted, again building on the previous engagement through the Planning for London Programme. The narrative will complement Talk London, including animations, story boards and other digital assets.

2.3. A range of communication methods across the GLA will be used to raise awareness of and promote involvement in the consultation on the HLD. This will include the following:

- trailing of the HLD at MIPIM (Le Marché international des professionnels de l'immobilier) by the Mayor and Deputy Mayors
- strategies for digital communications (social media, including sponsored social media)
- press strategy (including exploring potential for op-eds in national/London and industry press)
- work with the GLA's Digital Experience Unit to utilise London.gov in the most effective way to promote the HLD narrative and related digital assets
- animations and social media digital assets that speak to the HLD narrative in an understandable and clear way
- regular blogs and newsletters to stakeholders and those who have registered interest
- use of wider channels for cross promotion, for example using GLA family channels and providing communications packs to Boroughs and key strategic partners such as London Councils and the NLA.

2.4. The findings from this engagement will be set out in a consultation summary report, which will build on the previous Planning for London engagement and continue to shape policy development for the next London Plan. For clarity, it is noted that this is an informal engagement stage which is not required by legislation. [

2.5. Costs associated with ancillary costs for events, support for targeted engagement, managing the consultation responses from Talk London, Engagement HQ and other means such as letters and emails, the sponsored social media campaign and the procurement of digital assets such as animations are set out in Table 5.1.

### **3. Equality comments**

3.1. Under s149 of the Equality Act 2010 (the Equality Act), as a public authority the Mayor/GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).

3.2. The events programme will include both face-to-face and online events which will take place at different times in the day as well as on different days in the week to accommodate different circumstances. All venues will be fully accessible and reasonable adjustments such as language or sign language interpreters will be available on request in advance.

3.3. As well as events aimed at the community sector in general, there will be a specific event targeting groups of people with protected characteristics, which will build on the work from the deliberative events as part of the Planning for London programme.

3.4. All the documents, digital assets, online and printable content will be designed to be accessible and engaging. The possibility of a sponsored social media campaign will be explored that targets different audiences through different mediums compared to more traditional consultation methods.

3.5. The Talk London campaign will also target specific groups to ensure their effective inclusion and ability to participate. Feedback on previous successes in this area and potential contacts will be sought through the Communities team.

#### **4. Other considerations**

##### *Key risks*

##### Approval process

- 4.1. The 2021 London Plan will be five years old by 2 March 2026. It is essential that a draft London Plan is published by this date as not to do so would have significant detrimental impacts on how housing sites may come forward in different parts of London and on the proper planning of the capital. In order to achieve this, it is essential that the HLD consultation is published around the end of March 2025 to ensure sufficient time to inform the preparation of the draft Plan later this year.
- 4.2. Delays in the internal sign off process may create a risk of delay in the publication of the HLD. This has been mitigated by senior officer briefings across teams and meetings with relevant Deputy Mayors in the development of the HLD as well as a Mayoral briefings scheduled for its final sign off.
- 4.3. The prompt agreement of narrative / messaging and timely procurement of services is also essential to enable digital assets, animations, and proactive comms workstreams to commence with appropriate lead in times. Agreement of budget, pre-meetings with potential suppliers to ensure availability and agreement of key narrative are in place to help reduce any potential delays in production.

##### Significant requests for additional meetings/ events

- 4.4. Although there will be a programme of in-person and online events, due to the high-profile nature of the document there may be a significant number of requests from stakeholders and Londoners for further meetings over and above those set out in the programme, which may be beyond the capacity of the London Plan team, the Mayor and Deputy Mayors to manage. To mitigate this, the events programme will have several online events which will be open to anyone to attend as well as targeted stakeholders and Londoners only events – which we will work with partner organisations to host. There will also be a range of channels through which people will be able to participate, as well as animations, story boards and other digital assets to help explain the key approaches in the HLD. In addition, the Talk London and Engagement HQ platforms will have a Q&A facility.

##### Interactions with the emerging Strategic Planning Framework arrangements

- 4.5. As part of the Devolution White Paper, it was announced all areas in England are to be covered by a Strategic Development Strategy (SDS) which will have profound impacts on the structure of local government outside London. The development of these SDSs will not be in parallel to the London Plan programme, and there is a risk of a lack of alignment in the approach to strategic issues (which could potentially delay the preparation of the London Plan). To mitigate this, we will need to ensure proper engagement with these new bodies on strategic issues, as they come into force, in order to meet the new Duty to Corporate set out in the NPPF (National Planning Policy Framework).

##### *Links to Mayoral strategies and priorities*

- 4.6. There are a number of Mayoral strategies with shared priorities and objectives which will align with the over-arching strategy and spatial elements in the London Plan. The new London Plan will seek to reflect the priorities of the Mayor's London Growth Plan (due for publication in February 2025) and other strategic objectives. The HLD has been developed in collaboration with a range of GLA (family) teams to ensure other Mayoral priorities are understood and, as appropriate, reflected and so that the up-to-date position is properly expressed. This collaborative work will continue in the preparation of the draft London Plan.

#### *Consultations and impact assessments*

- 4.7. This consultation will inform policy development of the next London Plan. Participants will be encouraged to register with the Planning for London Programme email distribution to enable them to be informed of the preparation and key stages of the plan preparation including publication of the evidence base, consultation of the draft London Plan and the examination in public and subsequent adoption of the final London Plan.
- 4.8. An Integrated Impact Assessment, including an EqIA, will also be used to assess the draft London Plan as it is being prepared.

#### *Conflicts of interest*

- 4.9. There are no conflicts of interests to declare from those involved in the drafting and/or clearance of this Decision Form.

### **5. Financial comments**

- 5.1. Approval is requested for expenditure of up to £110,000 to support the engagement and comms on the London Plan – high level document consultation. This expenditure to deliver these activities will occur across the financial years 2024-25 and 2025-26. The expected profile of the spend is set out in the table below in 5.3.
- 5.2. This expenditure will be funded from the London Plan budget within the Planning Unit's approved budget for 2024-25 and the indicative plan for 2025-26.
- 5.3. See Table 5.1 below.

<b>Activity</b>	<b>2024-25</b>	<b>2025-26</b>
Procurement of support for: <ul style="list-style-type: none"><li>• production of digital animations</li><li>• support for targeted engagement for groups with protected characteristics</li><li>• support for managing consultation responses (Talk London, Engagement HQ and other (letters, emails, etc)</li></ul>	£25,000	£15,000 £25,000
Sponsored social media campaign	£15,000	
Ancillary costs to support the events programme		£30,000
<b>Total</b>	<b>£40,000</b>	<b>£70,000</b>

### **6. Legal comments**

- 6.1. Section 334 of the Act requires the Mayor to prepare and publish a Spatial Development Strategy (known as the London Plan) and section 339 of the Act requires the Mayor to keep the London Plan under review, especially matters which may be expected to affect the development of Greater London or the planning of its development.
- 6.2. The decision requested of the Mayor to collate the evidence base to support the London Plan also concerns the exercise of the GLA's general statutory powers under section 30 of the Greater London Authority Act ("the Act") to do such things considered to further or which are facilitative of,

conducive or incidental to the promotion of economic development and wealth creation, social development or the promotion of the improvement of the environment in Greater London.

6.3. In formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:

- pay due regard to the principle that there should be equality of opportunity for all people
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
- consult with appropriate bodies.

6.4. The Authority also has a subsidiary power pursuant to Section 34 of the Act to do anything which is calculated to facilitate or, is conductive or incidental to the exercise of any of the statutory functions of the Authority. In this case this piece of work to collate the evidence base to support the London Plan is incidental to its section 30 powers defined above as well as its powers under section 334 and 339 of the Act.

6.5. In taking the decision requested, 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. Throughout the process outlined above in particular section 3, due regard will need to be had to the equality impact considerations and mitigations.

6.6. The services required will be procured in consultation with TfL Procurement who will determine the detail of the procurement strategy to be adopted in accordance with the Authority's Contracts and Funding Code. Officers must liaise with TfL Procurement in this regard and to ensure all necessary contract documentation is put in place and executed before commencement of services.

## 7. Planned delivery approach and next steps

<b>Activity</b>	<b>Timeline</b>
Procurement of contract	Feb 2025
Delivery Start Date	Feb 2025
Delivery End Date	June 2025
Project Closure	End of June 2025

## 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? Yes

If YES, for what reason: Until the procurement of services for the digital animation and support for the engagement activities is complete.

Until what date: May 2025

## 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:

Rachael Rooney has drafted this report in accordance with GLA procedures and confirms the following:

✓

### Assistant Director/Head of Service:

Lucinda Turner 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.

✓

### Mayoral Delivery Board

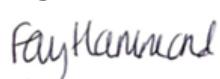
A summary of this decision was reviewed by the Mayoral Delivery Board on 3 February 2025.

✓

## CHIEF FINANCE OFFICER:

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

### Signature:



### Date:

03/02/2025