

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3503

### London Plan consultation support

### Programme: Making Best Use of Land

#### Executive summary:

The Mayor is required to prepare, publish and consult on the Spatial Development Strategy for Greater London: the London Plan. Subject to a separate Mayoral Decision (expected in due course), the Mayor intends to launch the statutory public consultation on the draft London Plan for at least 12 weeks, starting in Summer 2026.

To ensure the timely and effective delivery of the public consultation, in accordance with statutory requirements, support has been requested from Transport for London (TfL) on specific and defined tasks. This is in recognition of the successes shown on the Oxford Street Mayoral Development Corporation consultation. The GLA Planning & Regeneration Unit will retain overall responsibility.

For TfL to undertake this role, the Mayor must delegate certain statutory powers to it. In view of the costs to TfL of delivering aspects of the consultation, the Mayor is also requested to approve spending up to £100,000; and transferring this amount from the GLA to TfL.

#### Decision:

That the Mayor:

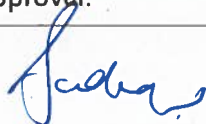
- delegates to Transport for London (TfL), as set out in Appendix 1, certain functions for the purposes of supporting the consultation and engagement process (the Delegation) for the draft London Plan
- approves transferring up to £100,000 to TfL, under section 121(1) of the Greater London Authority Act 1999 (the GLA Act), in view of the forecast costs to TfL of undertaking the work; TfL estimates these costs will comprise:
  - staff costs (£80,000)
  - producing an Easy Read version of the London Plan summary document (£1,600)
  - potentially producing British Sign language and audio formats (£10,000)
  - a contingency, which takes account of resource costs not being fixed
- pursuant to section 38(1) and (2) of the GLA Act, delegates authority to the Executive Director of Good Growth to finalise and action the transfer (including in instalments if considered appropriate) of £100,000 (referred to above) to TfL.

#### Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

12/5/21

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR**

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

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

- 1.1. The Mayor is required to prepare, publish and consult on the Spatial Development Strategy for Greater London: the London Plan. This is the spatial representation of the Mayor's vision for good growth. It sets out the development strategy framework for how London will develop over the next 20-25 years. Plan policies relate to housing; environment; economic development; infrastructure; and design. This informs boroughs' local plans and decisions on planning applications across London.
- 1.2. Subject to a separate Mayoral Decision (MD) (expected in due course), the Mayor intends to launch the statutory public consultation on the draft London Plan for at least 12 weeks, starting in Summer 2026. This gives Londoners and key stakeholders an opportunity to submit their views before the draft Plan is submitted to the Secretary of State for Housing (SoS), for an independent Examination in Public (EiP).
- 1.3. To help ensure the timely and effective delivery of the consultation, the London Plan team has requested support from TfL. TfL has extensive experience and expertise in carrying out consultations, including on behalf of the GLA, in accordance with relevant statutory requirements.
- 1.4. TfL's support will be focussed on:
  - the technical delivery of a digital publication of the draft London Plan, and all supporting documents on the GLA's engagement platform
  - content accessibility to ensure the Public Sector Equality Duty is met
  - procuring and managing a supplier who will manage consultation responses coming through the digital platform.

The GLA Planning & Regeneration Unit will retain overall responsibility for the consultation and engagement processes. It will continue to lead on policy and content development; stakeholder engagement; communications and marketing; and reporting and approvals.

- 1.5. For TfL to undertake this role, the Mayor must delegate certain powers to it. The proposed delegation is set out in Appendix 1.
- 1.6. It is also proposed that the Mayor approves spending and transferring £100,000 from GLA to TfL, under section 121 of the GLA Act 1999, in view of the costs to TfL of delivering these elements of the consultation. These costs relate to:
  - staff resources
  - producing an Easy Read document of the draft London Plan summary
  - potentially producing British Sign language and audio formats
  - a contingency that takes account of resource costs not being fixed.
- 1.7. It is also proposed that the Mayor approves a delegation to the Executive Director of Good Growth to finalise and action the transfer to TfL of the funding referred to above (including in instalments, if considered appropriate).

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

- 2.1. The objective of the consultation is to provide a formal and accessible opportunity for Londoners and any other interested parties to comment on the draft London Plan. This ensures that all views are captured, considered and published in accordance with statutory requirements, before the Plan is submitted for an independent EiP.
- 2.2. The Mayor must also demonstrate, to the panel of Planning Inspectors, the SoS and stakeholders, that he has engaged and consulted the public and stakeholders on the draft London Plan, by:
  - promoting, to the public and other stakeholders, the opportunity to respond to the minimum 12-week consultation
  - providing information, published in an understandable way and in accessible formats, to encourage participation in the consultation via the GLA's Engagement HQ platform
  - hosting a range of events with stakeholders and the public to address questions/encourage participation
  - defining topics of comments/questions related to the soundness of policies; these should be manageable to the public, and provide sufficient information for GLA Planning & Regeneration to continue developing the draft Plan
  - providing:
    - analysis of representations to the statutory consultation
    - consideration of those issues
    - publication of responses and an updated Plan.
- 2.3. The Mayor will be required to:
  - set out how all statutory requirements for consultation are met (e.g., timescales, statutory notice, and hard copy published)
  - provide a clear, transparent and justified narrative on the engagement/consultation on the new London Plan (likely to be an area of focus for the future panel of Inspectors, given the significance of the London Plan).

## **3. Equality comments**

- 3.1. Under section 149 of the Equality Act 2010 (the Equality Act), the GLA (including the Mayor), as a public authority, must comply with the Public Sector Equality Duty when exercising its functions. This is a duty to have due regard to the need to eliminate discrimination, harassment and victimisation, and any conduct that is prohibited by or under the Equality Act. There is also a duty to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. This involves:
  - having due regard to the need to remove or minimise any disadvantage suffered by those who share a relevant protected characteristic, that is connected to that characteristic
  - taking steps to meet the different needs of such people
  - encouraging them to participate in public life or in any other activity where their participation is disproportionately low.

- 3.2. The protected characteristics under section 149 of the Equality Act are: age, disability, gender reassignment, pregnancy and maternity, marital or civil partnership status, race, religion or belief, sex, and sexual orientation. Compliance with the duty may involve ensuring people with a protected characteristic are provided with all the opportunities that those without the characteristic would have.
- 3.3. The Mayor's Equality, Diversity and Inclusion Strategy sets out how the Mayor works to create a fairer, more equal, integrated city where all people feel welcome and able to fulfil their potential. Equality, diversity and inclusion are subsequently enshrined in the GLA's strategies, programmes and activities.
- 3.4. As part of its ongoing legal responsibility to have due regard to the need to promote equality in everything it does, including its decision-making, the GLA will seek to ensure the removal of barriers that may prevent those with protected characteristics benefiting from participating in the consultation. It will achieve this aim by:
- providing accessible consultation documents, including in Easy Read; and, where necessary, British Sign Language formats, and alternative languages
  - promoting the consultation widely across London; and enabling participation via different routes (e.g., accessible events)
  - giving consultation respondents the opportunity to highlight any accessibility or equality issues they foresee in process and policies.
- 3.5. As noted above, the London Plan consultation aims to provide a formal and accessible opportunity to comment on the draft London Plan. This will ensure that views are captured, published and considered in accordance with statutory requirements, and before the Plan is submitted for independent EiP.

#### 4. Other considerations

##### *Key risks and issues*

- 4.1. The key risks and issues are outlined in the table below:

<b>Risk</b>	<b>RAG rating</b>	<b>Mitigation</b>
Without the ability to seek support and delegate tasks, the GLA lacks the capacity to deliver a statutory consultation that meets the requirements of a lawful consultation.	Red	Delegating defined tasks and securing TfL to provide the technical and delivery support needed to meet legal and procedural requirements, helps the Planning and Regeneration Unit prioritise the continued development of the draft London Plan itself. This reduces the risk of non-compliance. Statutory responsibilities remain with the GLA.
Without delegation, the GLA may need to procure alternative support at short notice. This may lead to higher costs, inefficient procurement, and increased workloads for existing staff.	Red	Ensuring the capacity and specialist skills are in place to help deliver the statutory consultation efficiently, and to the required standard, avoids the need for urgent, more costly responses; and provides a stable and coordinated resource base.
Delays in securing resources and procurement could delay key consultation milestones,	Amber	Delegating tasks to TfL provides capacity and specialist expertise to help meet programme milestones.

and overall London Plan programme delivery.		Regular monitoring and governance arrangements will help ensure timely delivery. This has been captured in a draft Statement of Works and Consultation Plan.
Delivering an ineffective consultation could negatively impact confidence in the GLA's capability, processes and governance.	Amber	Expert support helps to ensure high-quality consultation materials, accessibility formats and response management. The GLA would retain oversight and sign-off on matters of compliance with equality and engagement standards.
There may be delays in obtaining support that has specific experience of the London Plan statutory consultation.	Amber	While TfL does not have direct experience of delivering a Local Plan statutory consultation, which operates at a significant scale, it can draw on the same core principles used in designing its own consultations (and the others it has led). It has likely applied these within its spatial planning work.

*Links to Mayoral delivery plans and other strategies*

- 4.2. The proposed approach – of drawing on TfL's expertise to support the preparation and delivery of the London Plan's statutory consultation – will help ensure timely, effective and robust delivery of the Mayor's next London Plan, and its adoption within this Mayoral term. This supports the outcomes set out for the Building More Homes and Making Best Use of Land delivery programmes, where the London Plan is central to setting out the policy direction and housing targets for local planning authorities across London. These policies and targets underpin sustainable development growth distribution across the city.
- 4.3. In developing the next London Plan for consultation, the Planning & Regeneration Unit has had regard to the Mayor's statutory strategies to ensure alignment and consistency across related areas. These include transport; housing; environment; economic development; and health priorities.

*Consultations and impact assessments*

- 4.4. In 2023, the Planning for London programme started to gather evidence on the views of Londoners and other interested parties – identifying issues and options that the London Plan review could consider. The engagement programme incorporated multiple routes for Londoners to share their views, including:
- Talk London
  - the Planning for London online portal
  - deliberative events
  - stakeholder events
  - a Design Future London challenge for young people
  - calls for evidence.
- 4.5. In Spring 2025, consultation on 'Towards a new London Plan' (the high-level direction-of-travel document on potential policy ideas for the next London Plan) ran for six weeks (from 9 May until 22 June). Responses were reviewed and have been used to inform the drafting of the new London Plan. This is expected to be published for consultation in Summer 2026.

- 4.6. The Easy Read version of 'Towards a new London Plan' went out for consultation from September to November 2025. Two engagement sessions were held in October and November 2025, with the first held in-person at City Hall and the second online. The events were facilitated by Publica CIC and Inclusion London. All the feedback and input that came through this engagement has been reviewed and used to inform the draft new London Plan.
- 4.7. An Integrated Impact Assessment (IIA) will be published alongside the draft new London Plan, as part of the statutory consultation. A draft IIA Scoping Report was published for consultation from December to February 2026; comments have been fed into the IIA. The IIA includes equality assessments in accordance with best practice and the Mayor's public sector equality duty.
- 4.8. Subject to a separate MD (expected in due course), the Mayor intends to launch the statutory public consultation for the draft London Plan; this would run for at least 12 weeks, in Summer 2026. Documents will be published and made available on the consultation website for inspection. The consultation will be promoted widely across London, supported by marketing and digital tools. There will be opportunities for Londoners and interested parties to attend events where they can hear about the draft Plan and learn how to make comments.

#### *Conflicts of interest*

- 4.9. No GLA officer involved in the drafting or clearance of this MD is aware of any conflicts of interest with the proposed programme.
- 4.10. If any conflicts of interest arise during procurement processes, officers will be required to declare that interest under the Contracts and Funding Code; and will be excluded from the procurement (or any other related) process or activity. This process will also be in accordance with the Code of Ethics and Standards for Staff and accompanying guidance on registering and declaring interests.

## **5. Financial comments**

- 5.1. Approval is requested to transfer £100,000 to TfL under section 121(1) of the Greater London Authority Act 1999 (GLA Act). This comprises:
  - TfL staff costs (estimated at £80,000)
  - producing an Easy Read document of the draft London Plan summary (up to £1,600)
  - potentially producing British Sign language and audio formats (£10,000)
  - a contingency that takes account of resource costs not being fixed.
- 5.2. The funding will come from the London Plan budget line in the 2026-27 GLA: Mayor budget. All expenditure will take place in the 2026-27 financial year.
- 5.3. All appropriate budget adjustments will be made.

## **6. Legal comments**

- 6.1. The statutory framework that applies to the London Plan replacement is set out in Part VIII of the GLA Act, and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 (the SDS Regulations).
- 6.2. Section 41 of the GLA Act sets out the general duties the Mayor has in respect of all of his strategies. In revising or replacing the London Plan, the Mayor shall have regard to the effect that it will have on:
  - various themes (health, health inequalities, sustainable development and climate change)

- the need to ensure consistency with:
  - national policies
  - the UK's EU obligations
  - other international obligations the Mayor is notified of by the SoS.

The Mayor is required to have regard to the resources available to implement the strategy. The Mayor must also have regard to the GLA's principal purposes, as set out in section 30 of the GLA Act:

- promoting economic development and wealth creation in Greater London
- promoting social development in Greater London
- promoting the improvement of the environment in Greater London.

6.3. The proposed consultation exercise, in respect of the draft new London Plan, must be carried out in accordance with the statutory requirements. Section 42 of the GLA Act provides that, when revising any Mayoral strategy, the Mayor must consult:

- the Assembly
- the functional bodies
- each London borough council
- the Common Council of the City of London
- voluntary bodies, some or all of whose activities benefit the whole or part of Greater London
- bodies that represent the interests of:
  - different racial, ethnic or national groups in Greater London
  - different religious groups in Greater London
  - persons carrying on business in Greater London.

6.4. Section 335 of the GLA Act sets out further consultation and public participation requirements specific to the London Plan. Article 7 of the SDS Regulations lists those persons (in addition to those set out in section 335(3)(a)-(c) of the GLA Act) to whom the Mayor is required to send a copy of his proposed London Plan. It is a statutory requirement that the consultation runs for at least 12 weeks.

6.5. Section 35(3) of the GLA Act provides that any function conferred on the Mayor by or under the GLA Act, or any other Act, shall be taken to be a function of the GLA, exercisable only by the Mayor acting on behalf of the GLA. The duty to consult under section 335 of the GLA Act, and the SDS Regulations, is therefore exercisable by the Mayor on behalf of the GLA.

6.6. Section 34(1) of the GLA Act allows the GLA – acting by the Mayor or the London Assembly, or both – to do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any of the GLA's functions exercisable by the Mayor.

6.7. Under section 38 of the GLA Act, any function exercisable on behalf of the GLA by the Mayor shall also be exercisable on behalf of the GLA by any of the bodies or persons specified in subsection (2), if or to the extent that the Mayor so authorises, whether generally or specially, and subject to any conditions imposed by the Mayor. TfL is one of the bodies specified in subsection (2). The exercise of the power to delegate functions under section 38 is a matter reserved to the Mayor under the Mayoral Decision Making in the GLA framework. The delegation to TfL is made subject to standard terms and

conditions set out in Appendix 1. The condition set out in 2(d), concerning cooperation with the GLA Monitoring Officer, is a requirement under section 73(6) of the GLA Act.

6.8. The Mayor has statutory power to authorise:

- spending up to £100,000 to cover the costs of delivering the consultation
- transferring that money to TfL, pursuant to section 121(1) of the GLA Act.

6.9. Pursuant to section 38 of the GLA Act, any function exercisable by the Mayor on behalf of the GLA may also be exercised by any member of staff of the GLA, including the Executive Director of Good Growth, subject to any conditions that the Mayor sees fit to impose. To this end, the Mayor may make the requested delegation to the Executive Director of Good Growth to transfer the money subject to the conditions and requirements set out within this MD.

6.10. Section 31 of the GLA Act places limits on the general power to incur, and prohibits the GLA from incurring, spend on anything that may be done by TfL, the Mayor's Office for Policing and Crime, or the London Fire Commissioner.

6.11. In taking the decisions requested of him, the Mayor must comply with the Public Sector Equality Duty contained in section 149 of the Equality Act. To this end, the Mayor should have particular regard to section 3, above, of this report.

## 7. Planned delivery approach and next steps

7.1. Subject to the Mayor's approval, set out below is the estimated timing for the delivery of the consultation.

<b>Activity</b>	<b>Timeline</b>
Statement of works developed	March 2026
Consultation Plan developed	April 2026
Build 'dummy' engagement platform with consultation questions	April – May 2026
Prepare Easy Read version of summary document	May – June 2026
Provide finalised text to be uploaded on to engagement platform	June 2026
Statutory public consultation	Summer 2026
Consultation closes – publish representations	October 2026
Manage responses (with team)	Autumn 2026

### **Appendices and supporting papers:**

Appendix 1: Mayoral Delegation to TfL for the delivery of the Local Plan statutory consultation

**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 be published either within one working day after it has been approved or on the defer date.

**Strategic Programmes**

**Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES**

If YES, which programme/s does this fall within: Making Best Use of Land

**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 the 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:**

Marissa Ryan-Hernandez has drafted this report in accordance with GLA procedures and confirms the following:

✓

**Sponsoring Director:**

Phil Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

**Mayoral Adviser:**

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

**Advice:**

The Finance and Legal teams have commented on this proposal.

✓

**Mayoral Delivery Board**

This decision was agreed by the Mayoral Delivery Board on 11 May 2026.

**CHIEF FINANCE OFFICER:**

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

**Signature**

**Date**

*Fay Hannard*

12 May 2026

**CHIEF OF STAFF:**

I am satisfied that this is an appropriate request to be submitted to the Mayor.

**Signature**

**Date**

*D. Bellamy*

11 May 2026

