

Annual Monitoring Report Framework

Consultation summary report

February 2022

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Greater London Authority

February 2022

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1. Introduction

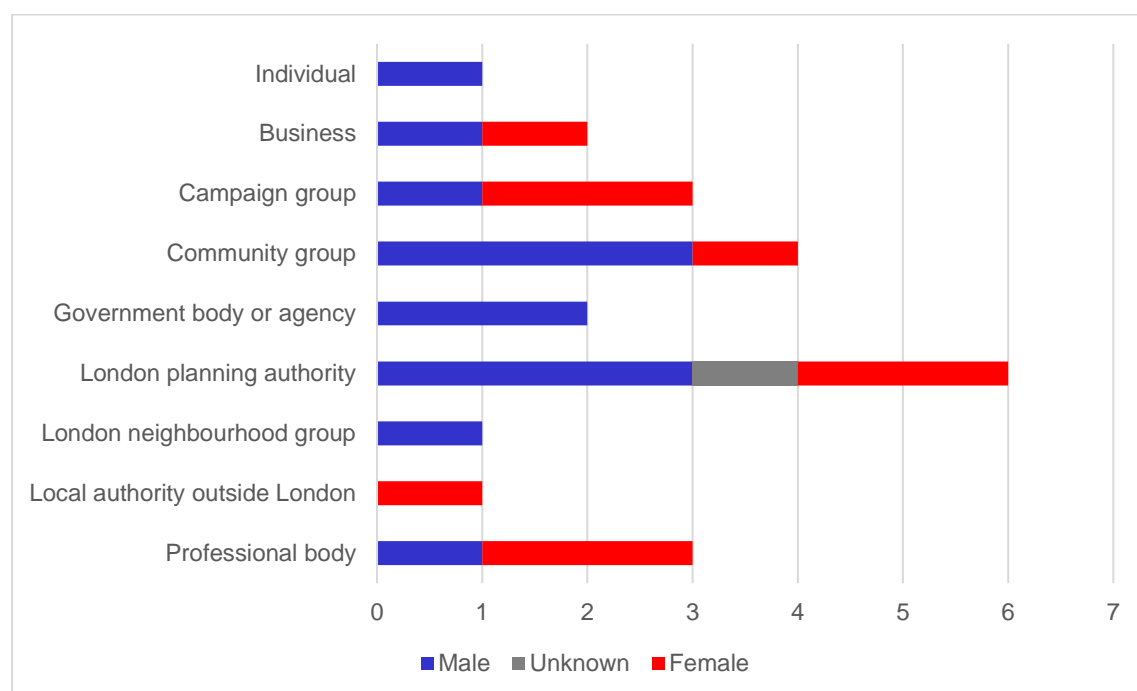
Between 14 December 2021 and 30 January 2022, the Greater London Authority (GLA) carried out a consultation on the Mayor's Annual Monitoring Report (AMR) framework template. This is the proposed template for monitoring the London Plan 2021.

In total, there were 23 responses to the consultation. This document provides a summary of the consultation responses received. The Mayor would like to thank everyone who took part for engaging with the guidance.

2. Who took part?

Respondents were asked what type of organisation they represent or whether they were responding as an individual.

Respondent type	Number	Percentage
Individual	1	4%
Business	2	9%
Campaign group	3	13%
Community group	4	17%
Government body or agency	2	9%
London planning authority	6	26%
London neighbourhood group	1	4%
Local authority outside London	1	4%
Professional body	3	13%
Total	23	



2.1 Respondent demographics

Respondents were not asked equality monitoring information due to the nature of the consultation.

More responses were submitted by men (57 per cent) than women (39 per cent).

A number of responses were from organisations representing a protected characteristic group:

- Mums for Lungs, Alliance for Childhood and a Mayoral Design Advocate, in relation to children and young people.
- Elysian Residences, in relation to older people.
- The London Forum of Amenity and Civic Societies requested previous key performance indicators (KPIs) for the 2016 London Plan are included, including one relating to race.

3. Consultation feedback and GLA response

This was an open consultation that did not ask specific questions. The feedback below sets out the key matters raised in the responses

3.1 Introduction and general comments

Proposed additional monitoring sought

1. Include chapter numbering in the contents page.¹
2. Page numbers.²
3. Chapter 2: Data and performance measures should be broken down further, potentially by London Plan chapter.³
4. An Executive Summary.⁴
5. Reference to the Town Centre Data Partnership in paragraph 1.2.2 of the Introduction.⁵
6. Question whether the KPIs are the right ones.⁶

Clarification sought

7. It would be helpful to be able to extract the reports from Kibana and use the visualisation tools to show findings of performance, making it more accessible to the public.⁷
8. Whether the document was issued before it was completed as the other datasets are not set out.⁸

GLA response

The final detail of the document – including layout, paragraph numbering, headings, how datasets are presented and similar – will be finalised when the first AMR is prepared, to ensure it is a high-quality document that is easy to read and navigate.

¹ London Borough of Richmond upon Thames, London Borough of Wandsworth

² London Borough of Richmond upon Thames, London Borough of Wandsworth

³ London Borough of Brent

⁴ London Borough of Newham

⁵ London Borough of Brent

⁶ Environment Agency

⁷ London Borough of Newham

⁸ London Forum of Amenity and Civic Societies

Page numbers will be included, together with relevant chapter references in the contents page.

The document has been designed to reduce the amount of text describing datasets and to focus on the narrative in order to assess performance against the Good Growth objectives (as set out in paragraph 12.1.3 of the London Plan) and against social, economic and environmental objectives; and to identify key impacts (positive or negative) on groups that share protected characteristics not otherwise outlined in the Integrated Impact Assessment for the London Plan. It is therefore considered that duplicating this text in an additional Executive Summary is unlikely to be necessary, or to assist in streamlining the process of preparing future AMRs. However, if it becomes clear, in producing the first such AMR, that an Executive Summary would provide value to the document, it can be added at that stage.

Datasets such as the Town Centre Data Partnership and Greenspace Information for Greater London are not open-source data, and are not accessible to members of the public. As such they will not be used for the AMR, which has a core principle of using only open and transparent data or evidence.

A range of data sources will be drawn on to enable meaningful performance-monitoring under chapters 3, 5 and 6. All data sets used will be either in chapters 1 or 2, or in a link provided in chapter 7. Only publicly available data will be used to understand performance of the London Plan, to ensure transparency and avoid additional resource burdens.

The AMR framework does not measure the performance of the policies in the plan individually, but rather measures performance against the Good Growth objectives in chapter 1 and social value, economic inclusivity and environmental sustainability. It would therefore be inappropriate to list all of the policies that, individually, contribute to each of these.

The AMR is also not the only source of data. The London Planning Datahub is a live database that can be used to answer a range of queries – for example, breaking cycle parking down by borough. We are currently building a live AMR dashboard that will enable data visualisation within the AMR, and enable anyone to extract data (including visualisations) directly from the London Planning Datahub in real time. Chapter 8 will list a range of publicly available data sources. However, these will be included and change on an annual basis depending on what data is available to the public and relevant to the AMR.

3.2 Chapter 1: Key Performance Indicators

Proposed additional monitoring sought

1. The general purpose of the AMR to help keep track of key trends is limited and individual policies (such as H7) will be required.⁹
2. The reduced number of KPIs will reduce the effectiveness of the monitoring process unless a wider range of data and information is collected to provide contextual information to supplement the KPIs.¹⁰
3. All KPIs from the 2016 London Plan KPIs should be monitored unless otherwise covered by the 2021 KPIs.¹¹
4. Question whether the KPIs are the right ones.¹²
5. Amend the KPIs to align with the UN Sustainable Development Goals.¹³
6. KPI 1 should include a breakdown of housing sources comprising the figure for non-self contained units (student units at a ratio of 2.5:1; older-person C2 units at a ratio of 1:1; and other non-self-contained units at a 1.8:1 ratio).¹⁴
7. KPI 1 should include a measure of how long it takes for approved homes to be completed.¹⁵
8. The KPI 1 target is unrealistic.¹⁶
9. A visual/mapped representation of the findings in Tables 1.1-1.4 (KPI 1 to KPI 4).¹⁷
10. KPI 2 should be broken down by tenure¹⁸ including comparisons to the Strategic Housing Market Area Assessment, and the Mayor's affordable housing and viability guidance.¹⁹
11. KPI 2 should be referenced to habitable rooms.²⁰

⁹ A Social Democratic Future

¹⁰ CPRE London, Urban Design London

¹¹ London Forum of Amenity and Civic Societies

¹² Environment Agency

¹³ Environment Agency

¹⁴ London Borough of Brent

¹⁵ London Forum of Amenity and Civic Societies

¹⁶ A Social Democratic Future

¹⁷ London Borough of Newham

¹⁸ London Borough of Brent

¹⁹ London Forum of Amenity and Civic Societies

²⁰ A Social Democratic Future

12. KPI 2 should link to an assessment of actual capacity and the reasons they are not met (by borough).
13. An additional KPI should measure net affordable completions (total) as a proportion of net new completions (total) as a five-year rolling average with a target from Policy H4 suggested as 35 per cent or 18,200 affordable homes.²¹
14. KPI 3 could be misleading as it does not include office losses.²²
15. The trebling of office floor space in KPI 3 is not supported by an explanation and should be compared to targets in the Mayor's Economic Strategy.²³
16. A target of a positive trend in KPI 4 is not considered to be sufficient and should be complemented by specific targets.²⁴
17. Use class references have not been updated: B1 in KPI 4; B1c in KPI 5; and²⁵ cultural uses in KPI 12.²⁶
18. An additional column in Table 1.5 (KPI 5) showing the breakdown by industrial land use class with the net gain/loss total at the bottom.²⁷
19. Achievement of KPI 5 has been undermined by the Secretary of State directions relating to London Plan industrial policies.²⁸
20. KPI 6 does not have a target, and should measure the extent of Green Belt and Metropolitan Open Land (MOL), including loss through plan-making or planning decisions; and harm that might be caused by inappropriate development on this land.²⁹
21. KPIs 6, 10 and 11 should also include reporting by boroughs for planning applications that are not referable to the Mayor.³⁰
22. The Building Regulation reference in KPI 7 needs to be updated; and a 35 per cent improvement on Building Regulations is not considered to be sufficient.³¹
23. The KPI at KPI 9 is not sufficient to monitor the subject area; and the measure for KPI 9 is considered inadequate to measure the target.³²

²¹ A Social Democratic Future

²² London Borough of Brent

²³ London Forum of Amenity and Civic Societies

²⁴ London Forum of Amenity and Civic Societies

²⁵ London Borough of Brent

²⁶ London Borough of Richmond upon Thames, London Borough of Wandsworth

²⁷ London Borough of Newham

²⁸ London Forum of Amenity and Civic Societies

²⁹ CPRE London

³⁰ London Forum of Amenity and Civic Societies

³¹ London Forum of Amenity and Civic Societies

³² London Forum of Amenity and Civic Societies

24. An additional column in Table 1.12 (KPI 12) showing the breakdown by cultural use class (including public houses) with the net gain/loss total at the bottom.³³
25. KPI 12 should have a target of increase, rather than no net loss.³⁴
26. A range of additional environmental KPIs should be included, e.g. greening, biodiversity net gain, reducing flood risk, water-use efficiency, river restoration, net waste self-sufficiency, and waste recycling.³⁵

Clarification sought

1. What London Plan policies does each KPI relate to?³⁶
2. Whether KPI 1 figures are net or gross.³⁷
3. What targets will be used to monitor performance for approvals under KPI 1?³⁸
4. Whether data from boroughs will be required for monitoring affordable workspace (KPI 4) or if this will come from the London Planning Datahub.³⁹
5. How KPI 6 will be measured.⁴⁰
6. KPI 6 should be clear on measuring potential loss of protected land rather than harm which is less tangible.⁴¹
7. Could the London Air Emissions Inventory be used for KPI 10?⁴²

GLA response

This is a new London Plan and the KPIs were agreed as set out in chapter 12. This followed extensive consultation, independent examination and scrutiny by the Inspectors and the Secretary of State. For this reason, the KPIs remain as the agreed monitoring framework for the Plan; are not subject to changes; and will need to be monitored by the GLA by collecting data that is sufficient to populate each of the relevant sections. However, the text for KPI 1 within the framework has been amended (Table 1.1 and paragraph 1.1.1) to clarify how it will be measured.

³³ London Borough of Newham

³⁴ London Forum of Amenity and Civic Societies

³⁵ Environment Agency

³⁶ London Borough of Brent

³⁷ London Borough of Brent

³⁸ London Borough of Richmond upon Thames, London Borough of Wandsworth

³⁹ London Borough of Richmond upon Thames, London Borough of Wandsworth

⁴⁰ London Forum of Amenity and Civic Societies

⁴¹ CPRE London

⁴² Environment Agency

Paragraph 12.1.1 of the London Plan makes clear that it is important to have a succinct set of Key Performance Indicators (KPIs) and measures against which to monitor the successful implementation of this Plan's policies. The KPIs support key Mayoral commitments and priorities in a structured way. They seek to assess yearly progress and to build meaningful time series. The measure for each indicator shows the direction and scale of change that the London Plan policies are seeking to achieve. They do not themselves represent additional policy.

It is noted, however, that a range of other data will also be monitored; this data is relevant to understanding implementation of the Plan (paragraph 12.1.2). This data is set out in proposed chapter 2 of the AMR framework.

Therefore, additional KPIs to those agreed in chapter 12 will not be added. However, additional datasets will be included in chapter 2 of the AMR Framework as appropriate, including where these have been suggested as additional KPIs in response to this consultation. When preparing the narrative for monitoring performance against the Good Growth objectives; social, environmental and economic performance; and impacts on groups that share protected characteristics, both the KPIs and the other datasets will be drawn on. However, a narrative will not be provided for each of the datasets in chapter 2 or separately for specific policies in the plan.

Since publication of the London Plan, the use class order has been updated impacting on KPIs 4, 5 and 12. This is addressed in the Statement on the use class order that accompanied the plan at publication. We will continue to monitor the information that accompanies planning applications and will continue to report at sub-category level where that remains possible (e.g. use class E(g)(i) offices).

Part L of the Building Regulations in relation to energy performance has also been updated since publication of the London Plan and will come into effect in June 2022. These changes will be taken into account in the reporting in the AMR.

3.3 Chapter 2: Data and performance measures

The GLA response is provided in tables embedded in each section for chapter 2. However, design quality and jobs arise in a number of sections and therefore the GLA response has been included here.

Design quality

Monitoring the use of design review panels has been added at chapter 2, section 3 number 9. However, the robustness of this will rely on external reporting and therefore the quality of the data that is provided. This will be kept under review.

Report on the use of design review panels may be complemented by other available data published over the monitoring period, for example any national monitoring by

the Office for Place or similar reports to the Place Alliance Housing Design Audit for England, the most recent of which can be found [here](#).

Whilst it would be useful to report the adoption of design codes in chapter 7, these are not subject to the requirement to submit to the Mayor under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004 for an opinion on general conformity. Therefore, it is not possible to publish a comprehensive list of adopted design codes across London.

Responses have suggested using awards or similar to monitor. However, whilst these may highlight examples of good design, they are not helpful in understanding overall design quality over the plan period.

Jobs

Jobs data is reported monthly by GLA Economics, and is included with the framework at chapter 2, section 2, number 5, to be reported to borough level.

It is noted that a range of floorspace is required across London to meet the needs of different sectors, irrespective of their employment density. This includes jobs data, with the inevitable inference that more jobs is a positive trend, which may not necessarily be the case. It could also suggest that the loss of sites with low employment density, for example for residential use, is acceptable; this is not necessarily the case in terms of the functioning of the London economy.

For this reason, whilst the AMR framework will report jobs at a borough level, it will not disaggregate this data further by geography or sector, and will primarily focus on understanding pipeline and completion of non-residential floorspace, all of which will generate jobs.

It is noted that Table 2.1 of the London Plan includes indicative jobs capacity for Opportunity Areas. However, this is not a target but rather an indicative capacity taking into account the range of employment (and related floorspace needs to accommodate it) that may be appropriate within that Opportunity Area. Therefore, notwithstanding this indicative capacity, within Opportunity Areas it is more meaningful to understand the non-domestic floorspace delivery and pipeline than specific job numbers. At this geography, there is a potential for more significant distortions. For example, a courier office will support many jobs as the work itself does not take place at that geographical location; these types of businesses are disproportionately represented in some locations around London.

3.3.1 Housing

Proposed additional monitoring sought

1. The 2016 London Plan housing target should be used for the whole of 2020-21 as an annualised target for 10 years to align with borough AMRs.⁴³
2. Joint monitoring, with neighbouring authorities focusing on housing and affordable housing, accompanied by a risk-management plan for under-delivery of housing.⁴⁴
3. Housing monitoring over longer periods, similar to LB Southwark.^{45,46}
4. Borough reporting of affordable housing (on and off-site) and Section 106 agreements, tracked against whether they were delivered in accordance with Section 106; remained outstanding; were cancelled; or differed from the original Section 106.⁴⁷
5. Genuinely affordable housing (defined in Policy H6 part A of the London Plan), as well as affordable housing, relating to GG4.⁴⁸
6. Delivery of older persons' housing,⁴⁹ including different types such as Integrated Retirement Community housing.⁵⁰
7. Delivery of purpose-built student accommodation.⁵¹

Clarification sought

8. The methodology for monitoring starts and completions of housing losses.⁵²
9. How the impact of the pandemic is being considered in relation to housing targets, in line with national methods.⁵³

⁴³ London Borough of Richmond upon Thames, London Borough of Wandsworth, London Borough of Brent

⁴⁴ Surrey County Council

⁴⁵ A reference to [this weblink](#) was provided

⁴⁶ A Social Democratic Future

⁴⁷ A Social Democratic Future

⁴⁸ Urban Design London

⁴⁹ London Borough of Newham

⁵⁰ Elysian Residences, Associated Retirement Community Operators

⁵¹ London Borough of Newham

⁵² London Borough of Richmond upon Thames, London Borough of Wandsworth

⁵³ London Borough of Brent

GLA response

Ref	Topic	GLA response
1	Housing target for March 2021	<p>Upon publication of the 2021 London Plan, as a newly produced part of London's development plan, any previous housing targets for the boroughs were replaced. As such, it is appropriate to reflect the plan's publication through a hybrid target that reflects one month of the new target, which came into effect in March 2021.</p> <p>Part-year arrangements are the accepted approach, for example, through the Housing Delivery Test (HDT), which records in full the months following adoption of a new housing target in a development plan document.</p> <p>However, it is also noted that completions data is not monitored in 'real time', and often only once or twice a year. As such, submission of data in March 2020-21 does not necessarily relate only to completions for that month and may also reflect housing that was completed at other times during the year. As such, the reference to March 2020-21 has been removed.</p> <p>However, new text has been added so boroughs who want to include completions from this period may do so, to enable them to be counted towards the overall delivery for the borough against their 10 year target.</p>
2	Joint monitoring	<p>Whilst the GLA will continue to work with authorities across the wider South East, it would not be appropriate to commit to publishing data that relies on third parties (for example, authorities outside Greater London). This could lead to significant delays in the publication of the AMR and the GLA cannot commit to publishing data to which it may not always have access, or timely access.</p> <p>However, housing delivery data is reported within the framework and appropriate measures will be taken to address under-delivery.</p>
3	Longitudinal housing data	This will be provided under chapter 2, section 1.

4	Borough reporting of affordable housing per S106	This detailed information is not held by the GLA and it would not be possible to publish it in the form requested. However, the Planning London Datahub does record information at submission and determination of a planning application, and therefore a new monitoring dataset has been included at chapter 2, section 1, number 6, to provide this information.
5	Genuinely affordable housing	This is covered in part by the data on affordable housing in chapter 2, section 1, number 4, although this has been amended to ensure total figures are reported as well as the percent. Different tenures will be reported, including Social Rent, London Affordable Rent, London Living Rent and London Shared Ownership, which are considered to be genuinely affordable as set out in 4.6.3 of the London Plan.
6 7	Older persons' housing and student housing	This is included in the reference to "type/source" of housing. However, it would not record specifically if it was an integrated retirement community, as this level of detail is not possible in this strategic monitoring. It would, however, record housing units in different use classes differently.
8	Housing losses	Housing losses will be monitored in accordance with the GLA's methodology. There are discussions taking place around how this data is recorded, and the AMR reporting will reflect the latest position at the time. If there are changes to the methodology, that will also be reported in the AMR, including any impact on long-term datasets.
9	Pandemic impacts	The application of these KPIs will include narrative where targets are not met – which, together with the Good Growth objectives, will include the impact of outlier or unforeseeable circumstances such as the global pandemic and its impact. However, the AMR monitoring does not have the same implications for local authorities as the HDT; therefore changes to the monitoring regime itself is not required. Consideration will need to be given to the way in which this information is presented; and whether a trajectory 'shift' should be shown if it becomes clear that an under-performance due to the pandemic is not

		recoverable over the whole plan period. If this is the case, it will be presented in chapter 2.
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3.3.2 Non-housing

Proposed additional monitoring sought

1. Office floorspace completions (alongside starts and approvals), particularly at a sub-regional and/or regional level, noting that there could be duplication at borough level.⁵⁴
2. Net change in B1c, B2 and B8 floorspace in designated industrial locations for the whole of the Central Services Area (in addition to borough level).⁵⁵
3. Visitor accommodation delivery.⁵⁶
4. Losses of cultural infrastructure due to permitted development rights relating to Policy SD6(E).⁵⁷
5. Non-residential monitoring should include 'retail parks'.⁵⁸
6. If the losses/gains of designated town centres and industrial land is a measure of boundary changes through local plans, this should be complemented by the change in overall floorspace through planning applications within the areas.⁵⁹
7. Vacancy rates for each strategic industrial location; locally significant industrial site; and metropolitan, major or district town centre.⁶⁰
8. Jobs broken down by sector at London-wide and borough level.⁶¹
9. Protection of industrial land and waste designations to meet waste self-sufficiency.⁶²
10. Prior approvals (approvals, starts and completions).⁶³

⁵⁴ London Borough of Lambeth

⁵⁵ London Borough of Lambeth

⁵⁶ London Borough of Lambeth

⁵⁷ Urban Design London

⁵⁸ London Borough of Newham

⁵⁹ London Borough of Newham

⁶⁰ London Borough of Brent

⁶¹ London Borough of Brent

⁶² London Waste Planning Forum

⁶³ London Borough of Lambeth

Clarification sought

11. Unclear if the 'loss or gain of designated TC/Industrial Land' is intended to be measured as a result of boundary changes through Local Plans.⁶⁴

GLA response

Ref	Topic	GLA response
1 2 3	Offices, visitor accommodation and Central Services Area	This has been clarified/added at chapter 2, section 2, numbers 1, 2 and 3.
4	Cultural use losses	This is covered in chapter 2, section 2 and section 3, number 10.
5	Retail parks	These are not designations held at the GLA level; therefore, it is not possible to disaggregate the data on the basis of a retail park location.
6	Changes to designated areas complemented by floorspace data	Changes in overall floorspace will be covered by chapter 2, section 2, numbers 1-3 and 10. However it is not possible to report on each of the 241 town centres separately.
7	Vacancy rates	This data is not held in a form available for annual reporting. However, this type of information is included periodically through industrial supply studies.
8	Jobs	See section 3.3, above.
9	Waste designations	Added at chapter 2, section 2, number 9.
10	Prior approvals	Added at chapter 2, section 2, number 10.
11	Designated land	Clarification added at chapter 2, section 2 numbers 7 and 8.

⁶⁴ London Borough of Newham

3.3.3 Growth patterns and sustainability

Proposed additional monitoring sought

1. Use of brownfield land to assess GG2.⁶⁵
2. Use of previously developed land to assess GG2.⁶⁶
3. Small site development relating to Policy H2.⁶⁷
4. Density of new development, particularly housing and separated out for Opportunity Areas⁶⁸ and compared to borough averages relating to GG2.⁶⁹
5. Tall buildings by design review panel, energy use and public realm contributions.⁷⁰
6. Tall-buildings monitoring should be based on 18m definition in Policy D9 rather than 30m, with further analysis regarding whether the local plan definition applies.⁷¹
7. Design quality of new development, particularly housing⁷² (see also Good Growth objectives and Opportunity Areas below).
8. Mixed-use development or uses that are not predominant in an area relating to GG4.⁷³
9. Air quality⁷⁴ including at least NO₂ and PM2.5.⁷⁵
10. Waste arising (tonnes) in London by waste stream; management capacity (tonnes) by waste stream and type of capacity (e.g. recycling,⁷⁶ recovery) and movements (imports and exports in tonnes to and from London by waste stream);⁷⁷ existing capacity vs need; rates of reuse/recycling/recovery/beneficial use by waste stream, locations and types of waste sites via the

⁶⁵ CPRE London

⁶⁶ CPRE London

⁶⁷ Urban Design London, London Borough of Brent

⁶⁸ CPRE London

⁶⁹ Urban Design London

⁷⁰ London Borough of Newham

⁷¹ London Borough of Brent

⁷² CPRE London

⁷³ Urban Design London

⁷⁴ Mums for Lungs, a London resident

⁷⁵ Mums for Lungs

⁷⁶ Environment Agency

⁷⁷ Sacks Consulting, CPRE London, London Borough of Newham, Surrey County Council, London Borough of Brent, London Waste Planning Forum, South East Waste Planning Advisory Group, Environment Agency

London Waste Map; comparison of waste arising to forecasts in the London Plan.⁷⁸

11. To assess London's net waste self-sufficiency,⁷⁹ all waste types need to be measured – not just those with apportionment targets, e.g excavation waste⁸⁰ or excavation waste from large infrastructure projects such as HS2.⁸¹
12. Implementation of the circular economy principles including construction, demolition and excavation waste reused on site; reduction of this waste stream; and the proportion of recycled aggregates used.⁸²
13. Net change in Green Belt and MOL should also be expressed in loss and additions.⁸³
14. The extent, quality (including noise) and condition of green space; relationship to areas deficient in green space; degree of public accessibility; ownership (public and private).⁸⁴
15. Biodiversity net gain⁸⁵ and the condition of wildlife, particularly in sites of importance for nature conservation (SINCs), to be provided by Natural England, Greenspace Information for Greater London (GiGL) and groups such as the London Wildlife Trust, in view of the Environment Act.⁸⁶
16. Implementation of artificial nest sites through planning conditions.⁸⁷
17. Implementation of the urban greening factor.⁸⁸
18. The amount of play space and amenity space, approvals and completions;⁸⁹ or the play sufficiency assessment applied by the Welsh and Scottish Governments; or a minimum of 10sqm play space per child.⁹⁰
19. The extent of public and private parking relating to GG2.⁹¹

⁷⁸ London Waste Planning Forum

⁷⁹ Environment Agency

⁸⁰ London Waste Planning Forum

⁸¹ Environment Agency

⁸² London Waste Planning Forum, Environment Agency

⁸³ CPRE London

⁸⁴ CPRE London

⁸⁵ London Borough of Newham, Environment Agency

⁸⁶ CPRE London

⁸⁷ Islington Swifts Group

⁸⁸ CPRE London, London Borough of Brent, Environment Agency

⁸⁹ Mayoral Design Advocate

⁹⁰ Alliance for Childhood

⁹¹ CPRE London

- 20. Number of disabled parking spaces per completed major development, reported at a borough level.⁹²
- 21. Measures to increase connectivity such as new links (streets, cycleways, footpaths, green infrastructure, light railway etc) and decreases in connectivity e.g., stopping up orders, both relating to GG2.⁹³
- 22. Compliance with non-road mobile machinery Low Emission Zone relating to Policy SI 1.⁹⁴
- 23. Department of Transport data on child mobility.⁹⁵

Clarification sought

- 24. Whether the data on provision of cycle parking will be provided at borough level.⁹⁶
- 25. How the restoration of rivers and streams will be monitored.⁹⁷

Ref	Topic	GLA response
1	Brownfield land	This is already provided in chapter 2, section 3, number 1.
2	Previously developed land	Where this is not provided in chapter 2, section 3, number 1, it would be picked up in the analysis of chapter 2, section 3, numbers 2 and 3.
3	Small site development delivery	This is already provided in chapter 2, section 1, numbers 1 and 3.
4	Density	Added at chapter 2, section 3 number 10.
5 6	Tall buildings	The definition of tall buildings used relates to the threshold for referable planning applications, which is considered appropriate for monitoring the strategic plan for London. Local definitions of tall buildings are appropriate for monitoring the effectiveness of their own tall buildings

⁹² London Borough of Lambeth

⁹³ Urban Design London

⁹⁴ London Borough of Brent

⁹⁵ Alliance for Childhood

⁹⁶ London Borough of Lambeth

⁹⁷ London Borough of Newham

		policies (and local definitions of tall buildings) through their Authorities' Monitoring Report.
7	Design quality	See paragraph 3.3 above of this consultation summary.
8	Mixed use	This analysis would rely on an understanding of the predominant use of all parts of London, which is a level of understanding not held by the GLA. However, using the information in chapter 2, section 1, numbers 1 and 3 would provide information on residential development coming forward in more commercial areas. Similarly, information in chapter 2, section 2, numbers 1 and 3, would also provide information about non-residential floorspace changes outside predominantly commercial areas.
9	Air quality	Added at chapter 2, section 3, number 15.
10 11	Waste data and waste self-sufficiency	Added at chapter 2, section 3, number 16.
12	Circular economy	Added at chapter 4, number 4 as this requirement only applies to referable applications.
13	Green belt and Metropolitan Open Land	Change made to chapter 2, section 3, numbers 2 and 3, as well as 10 (heritage assets) which had the same wording.
14	Green space	<p>Additional data (local open space) added at chapter 2, section 3, number 4, and reference to areas of open space deficiency.</p> <p>The GLA does not hold other qualitative data about the quality or use of spaces. This analysis is best reported at a local level through local and/or neighbourhood plan-making.</p> <p>The GLA does not hold information about the ownership of green spaces unless they are in public ownership; this is reported here. This could be included under chapter 8 but should not be duplicated in the AMR.</p>
15 16	Biodiversity net gain	<p>Gains and losses of SINCs will be reported (chapter 2, section 3, number 5).</p> <p>The GLA does not hold other qualitative data about biodiversity and the condition of wildlife; nor does it have the scope to commit to drawing together different datasets from multiple organisations. However, the Environment Act may</p>

		<p>change the role of the GLA; this will therefore be kept under review.</p> <p>The installation of artificial nest sites is a level of detail that would not be appropriate in the strategic monitoring of the London Plan.</p>
17	Urban greening factor	Added at chapter 2, section 3, number 17.
18	Play and amenity space	Added at chapter 2, section 3, number 18.
19	Land used for car parking	<p>This cannot be looked at annually, as this information cannot be readily accessed annually.</p> <p>However, further consideration will be given to whether this would be appropriate evidence that could be prepared outside the annual statutory monitoring. It has therefore been fed into the separate Planning for London Programme for further consideration. For more information about this programme please see here.</p>
20	Disabled parking	Added at chapter 2, section 3, number 19.
21	Changes to connectivity	Changes to Public Transport Accessibility Levels have been added at chapter 2, section 3, number 6, this being the form in which we hold such information. It would not be possible to give specific details on an individual-scheme basis.
22	Low Emission Zone	Monitoring of the Low Emission Zone will be undertaken through statutory monitoring of the Mayor's transport and environment strategies. This does not need to be duplicated in the London Plan monitoring but would be cross-referenced in chapter 8.
23	Child mobility	Transport mode share for school trips added at chapter 2, section 3, number 6, which is the main data held on this.
24	Cycle parking	See 3.1 Introduction and general comments.
25	River restoration	See 3.1 Introduction and general comments.

3.3.4 Chapter 3: Opportunity Areas

Proposed additional monitoring sought

1. Greenspace implementation in Opportunity Areas.⁹⁸
2. Narrative relating to cross-boundary impacts (outside London) of failing to deliver homes or key infrastructure.⁹⁹
3. Design quality of new development, particularly housing.¹⁰⁰
4. Comparison of data to the indicative homes and jobs for the Opportunity Area in Opportunity Area Planning Frameworks and Local Plans.¹⁰¹
5. Reporting how Opportunity Areas move through stages, from nascent to mature.¹⁰²

GLA response

Ref	Topic	GLA response
1	Greenspace	The information is not held as requested. However, changes to open space designations have been added at chapter 3, 3.1.1 (7); and urban greening factor information has been added at chapter 3, 3.1.1 (8).
2	Delivery risks/failures	<p>Added to chapter 3 at 3.1.2.</p> <p>If there was significant shortfall in delivery of housing across London as a whole, this would also be included at 5.4.1. This, and assessment against GG2 at 5.2.1 and GG5 at 5.5.1, would draw out the implications of funding and delivery of key transport infrastructure that was anticipated within the plan period. Any impacts on authorities outside London would be referenced in those sections, rather than specifically in relation to Opportunity Areas.</p>
3	Design quality	See paragraph 3.3, above, of this consultation summary.

⁹⁸ CPRE London

⁹⁹ Surrey County Council

¹⁰⁰ CPRE London

¹⁰¹ London Forum of Amenity and Civic Societies

¹⁰² London Forum of Amenity and Civic Societies

4	Comparison to Table 2.1 homes and jobs	Added at chapter 3, 3.1.1, number 1 and 3.1.2. However, also refer to 3.3, above, in relation to jobs.
5	Stages of OA	The stage of Opportunity Areas indicated in Figure 2.2 of the London Plan will be kept under review through the London Plan development process. Opportunity Areas will move into different stages through London Plan review rather than the AMR.

3.3.5 Chapter 4: Referable applications

Proposed additional monitoring sought

1. Consideration of third-party representation for referable applications.¹⁰³
2. Schemes subject to design review or quality review, and resulting refusals or revisions relating to Policy D4(D).¹⁰⁴

GLA response

Ref	Topic	GLA response
1	Public involvement	<p>It is noted that the Mayor is only the decision-maker for Stage 3 referable applications. For Stages 1 and 2, the Mayor is giving his view on the proposal to the decision-maker. Therefore, monitoring public involvement at these stages would be inappropriate.</p> <p>Added to chapter 4 at number 3. This will also be picked up as it is applied by the London Plan through monitoring GG1 in chapter 5, which states:</p> <p><i>“Those involved in planning and development must: A) encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies.”</i></p>
2	Design quality	See section 3.3, above.

¹⁰³ CPRE London

¹⁰⁴ Urban Design London

		If there was significant shortfall in delivery of housing across London as a whole, this would also be included at 5.4.1. This, and assessment against GG2 at 5.2.1 and GG5 at 5.5.1, would draw out the implications of funding and delivery of key transport infrastructure that was anticipated within the plan period. Any impacts on authorities outside London would be referenced in those sections rather than specifically in relation to Opportunity Areas.
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3.3.6 Chapters 5 and 6: Good Growth objectives; and social, environmental and economic value

Proposed additional monitoring sought

1. Qualitative analysis of design quality e.g. industry recognition or awards.¹⁰⁵

Clarification sought

2. How will the framework assess progress on delivery of the Good Growth objectives – particularly GG1a, GG2e, GG5b and GG5d – and what information will be used?¹⁰⁶
3. Whether the narrative in the Good Growth section is more qualitative and descriptive.¹⁰⁷
4. How social value will be captured¹⁰⁸ and to what extent boroughs will need to provide data.¹⁰⁹
5. How inclusive economic growth will be captured and to what extent boroughs will need to provide data.¹¹⁰

GLA response

These matters are addressed in 3.1: Introduction and general comments, and 3.3, in relation to design quality.

¹⁰⁵ London Borough of Brent

¹⁰⁶ Old Oak Neighbourhood Forum, London Forum of Amenity and Civic Societies

¹⁰⁷ London Borough of Brent

¹⁰⁸ London Forum of Amenity and Civic Societies

¹⁰⁹ London Borough of Brent

¹¹⁰ London Borough of Brent

3.3.7 Chapter 7: Plan-making

Proposed additional monitoring sought

1. Progress on neighbourhood plan-making.¹¹¹
2. Article 4 Directions relating to Policies SD5, SD9, E1 and E4.¹¹²
3. Use of the Local Green Space designation.¹¹³
4. Adoption of local targets and site allocations for older people's housing.¹¹⁴
5. Involvement of children in the planning process.¹¹⁵

Ref	Topic	Response
1	Neighbourhood plan-making	Added at chapter 7, number 1.
2	Article 4 Directions	Article 4 Directions are not subject to any requirement to notify the Mayor. Therefore, these should continue to be monitored individually through Authorities' Monitoring Reports.
3	Greenspace designation	These are through the neighbourhood plan-making function and not separately notified to the Mayor. Changes to designated green space boundaries would be captured under chapter 2, section 3, number 4.
4	Older persons' housing	This is managed through the Mayor's 'general conformity' responses to individual plans; there is no capacity to monitor separately. It is also noted that boroughs should be monitoring individually through their Authority's Monitoring Report.

¹¹¹ Neighbourhood Planners London, Old Oak Neighbourhood Forum, CPRE London, London Borough of Brent

¹¹² London Borough of Brent

¹¹³ CPRE London

¹¹⁴ Elysian Residences, Associated Retirement Community Operators

¹¹⁵ Alliance for Childhood

5	Involvement of children in plan-making	The diversity and inclusivity of public involvement will be covered in chapter 5, 3.1.1: monitoring GG1, including the range of activities being implemented through the GLA Planning Service emerging engagement plan and the new section at chapter 6, 6.3.1.
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3.4 Support

Support was given for the following:

- Reference to net change in Green Belt and MOL in chapter 2.¹¹⁶
- Monitoring restoration of rivers and streams.¹¹⁷
- KPI11: impact on London's heritage.¹¹⁸
- Heritage at risk.¹¹⁹
- Live planning data that is accessible.¹²⁰
- Analysis of achievement against Good Growth objectives.¹²¹
- Reporting on sustainable environmental performance.¹²²

3.5 Other matters raised

1. Proposing less high-density tower block schemes, including reference to fire safety, virus spread and exposure to poor air quality.¹²³
2. The need to reduce air pollution.¹²⁴
3. Seeking greater protection for, and improving the quality and condition of, green space including Green Belt and Metropolitan Open Space, and other

¹¹⁶ CPRE London

¹¹⁷ CPRE London, London Borough of Newham

¹¹⁸ Historic England

¹¹⁹ Historic England

¹²⁰ London Borough of Brent

¹²¹ London Borough of Brent

¹²² Environment Agency

¹²³ London resident

¹²⁴ London resident

local open space, trees and the natural environment;¹²⁵ and measuring the impact of Covid.¹²⁶

4. Protection for pubs, social clubs, listed buildings, nightclubs and independent retail units from demolition and redevelopment.¹²⁷
5. Creating a local environment that supports physical and mental well-being.¹²⁸
6. Provision of safe and secure affordable housing with access to open space.¹²⁹
7. Improving design quality and ensuring densities are sufficiently high to promote sustainable travel modes are central to achieving KPIs 8-10.¹³⁰
8. Insufficient attention to the extent, quality and condition of green space.¹³¹
9. Too much land (public and private) is used for parking privately owned vehicles. Modal shift should create significant redundant 'greyspace' that can be repurposed for green space, public realm and housing. CPRE are leading a project 'Grey to Green' promoting this for green space.¹³²
10. Many roads could be decommissioned/pedestrianised/greened (allowing for emergency/utility access as necessary) to promote sustainable transport; improve the public realm; and make space for relaxation and play, sustainable urban drainage, and trees and other greening. Changes to the London Plan (rather than the AMR framework) are sought.¹³³
11. Green space should be measured against the degree to which it is delivering public and eco amenities (or ecological services). These are related to the quantum, location and qualities of a space. It may be possible to consider proxies. There can be mismatches between data and categorisation (borough, GiGL, GLA, communities), including specific issues around recording and monitoring public access to green spaces. Such issues may have implications for the future use of that land, including loss of access or loss of open space, for example:¹³⁴
 - use of public open space for purposes other than those intended
 - access, the cost of access and membership-only-type access barriers

¹²⁵ London resident, CPRE London

¹²⁶ CPRE London

¹²⁷ London resident

¹²⁸ London resident

¹²⁹ A London resident

¹³⁰ CPRE London

¹³¹ CPRE London

¹³² CPRE London

¹³³ CPRE London

¹³⁴ CPRE London

- private open space being used for development
 - semi-accessible open space (e.g. reasonable entrance fee) being used for private purposes
 - privately owned land covenanted for public amenity required to be excluded in public records
 - removal of access by fencing off, etc, so land becomes derelict.
12. Planning policies should be strengthened against private greenspace being unmanaged, including for this to be a reason for refusal of development.¹³⁵
13. London boroughs are encouraged to adopt a similar KPI to KPI11.¹³⁶
14. Ongoing discussions and training about identifying benefits and harm to heritage assets, via reports for referable applications, would be welcome.¹³⁷
15. Where qualitative assessments and case studies would help to assess and monitor the Good Growth policies in relation to heritage, Historic England can assist.¹³⁸
16. The accuracy of data in the Planning London Datahub.¹³⁹
17. The 2021 HDT has retrospectively applied the new London Plan targets.¹⁴⁰
18. Waste can only be monitored at the strategic authority level because some waste streams are recorded at a sub-regional level and therefore are not captured in borough monitoring.¹⁴¹ This used to be done via the Environment Agency (via the London Waste Planning Forum) but the funding for this is no longer available. The forum could provide this function if funding was made available.¹⁴²
19. Concerns about delays to the publication of AMRs for 2018-19 and 2019-20 and the timescales for publication for 2022-23 would improve on recent AMRs.¹⁴³

¹³⁵ CPRE London

¹³⁶ Historic England

¹³⁷ Historic England

¹³⁸ Historic England

¹³⁹ London Borough of Brent

¹⁴⁰ London Borough of Brent

¹⁴¹ South East Waste Planning Advisory Group

¹⁴² London Waste Planning Forum

¹⁴³ London Forum of Amenity and Civic Societies: A social democratic future

20. The over-arching policy framework should be more positive in relation to the provision of Integrated Retirement Communities.¹⁴⁴
21. Boroughs need to monitor affordable housing delivery, including on or off site, and in line with Section 104 requirements which should be shared with the GLA.¹⁴⁵
22. Net biodiversity gains are insufficiently detailed to support existing buildings-based species, e.g., nest boxes.¹⁴⁶
23. The Environment Agency may be able to offer support, via information to monitor sustainable environmental performance and new KPIs/data for monitoring environmental performance against the London Plan.¹⁴⁷
24. The Environment Agency would not be able to provide information to monitor KPIs 6, 7 or 10.¹⁴⁸

GLA response

A number of other matters raised relate to the content of the London Plan itself. We would encourage all participants to get involved with the Planning for London Programme which is the initial stage in engaging about what a future London Plan might include. Where relevant, responses to this consultation have also been shared with that programme. However, they cannot be taken further in relation to the AMR framework for the current London Plan.

A number of responses referred to other datasets. Where these are in the public domain, in a useable format, they may be used where they: add value to understanding performance of the London Plan; relate directly to its implementation; and are consistent with and complement other datasets already in use.

Finally, a number of comments were provided relating to other monitoring, data and digital activity of the GLA. These have been passed to relevant people as appropriate.

4. Equality impacts

Respondents raised the following potential equality impacts arising in relation to the draft guidance:

- The impact of poor air quality on children and young people.

¹⁴⁴ Elysian Residences, Associated Retirement Community Operators

¹⁴⁵ A Social Democratic Future

¹⁴⁶ CPRE London, London Borough of Brent

¹⁴⁷ Environment Agency

¹⁴⁸ Environment Agency

- The need for provision for and engagement with children and young people when planning for London.
- The need for play space.
- The need for housing options for older people.

GLA response

The impact of the policies within the London Plan and the Good Growth objectives on equality considerations is set out within the documentation that accompanied the London Plan.¹⁴⁹ It is not intended to revisit those assessments within the annual monitoring, and the resource required to do this would be prohibitive.

However, a new section has been added to record identified unexpected or unanticipated impacts in relation to equality; and impacts on people who share protected characteristics – either a positive or a negative outlier.

5. Next steps and monitoring

The Mayor must formally approve the AMR Framework for it to become the new agreed Framework for monitoring the London Plan. It will first be used for the 19th AMR, which is anticipated for publication in March 2023, and will monitor the period 2021-22.

The KPIs used in the framework will be kept under review and updated as necessary in any future new London Plan, or as relevant to any revision to the current London Plan.

The data published in chapter 2 or cross-referenced in chapter 8 of the framework will also be kept under review. Data may be added or removed in accordance with the overarching principles of the framework, including the following scenarios:

- If data that was previously in the public domain is no longer available, consideration would need to be given as to whether it is readily accessible to the GLA and can be made public; or whether it should not be reported in future.
- If new, publicly-available data emerges, which can help us understand performance of the London Plan implementation in a new way, it may be reported in chapter 2 or cross-referenced in chapter 8.

Monitoring the implementation of the London Plan will be used to inform the following:

¹⁴⁹ These can be viewed [here](#). The detailed EqlA tables, published for examination, can be viewed at [here](#).

- How policies are being applied in practice; any unintended impacts; and the cumulative impact of plan-making and decision-making taken as a whole for Greater London.
- The need for London Plan Guidance or other material considerations to ensure good growth.
- The need for other interventions, programmes and funding to ensure delivery against key targets and growth patterns.
- The need for evidence including 'live' information and qualitative data to complement quantitative data.
- Implementation of the London Plan through local and neighbourhood planning and Mayoral responses on 'general conformity' under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004.
- The next London Plan, whether a new plan or a revision to the current one.

Appendices

You are unlikely to require any appendices, but you may need to include information here that isn't anywhere else (usually on the consultation webpage). For example:

Appendix 1: Summary of responses by organisation

For very large consultations, e.g. more than 250 responses, it might be worth summarising which sorts of groups responded in what way to particular questions – this is likely to be the qualitative ones (rather than thematic questions) and for the sake of clarity you should group “strongly agree/somewhat agree” and “strongly disagree/somewhat disagree” and exclude “don't knows”. This would only be if this is particularly informative or useful.

Appendix 2: References

Only include if relevant.

