

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2978

Title: Annual Monitoring Report Framework for the London Plan 2021

Executive Summary:

The London Plan was formally published in March 2021 making it part of the statutory development plan for Greater London. Section 346 of the Greater London Authority (GLA) Act 1999 requires the Mayor to monitor the implementation of the London Plan. This MD seeks authority for a novel monitoring framework to do this in accordance with Chapter 12 of the London Plan and the [Sustainability Statement](https://www.london.gov.uk/sites/default/files/london_plan_2021_sustainability_statement.pdf)¹ that was published alongside the Plan.

The first Annual Monitoring Report (AMR) to use this framework will be AMR 19 for the monitoring period 2021-22, which is expected to be published in March 2023.

Decision:

That the Mayor:

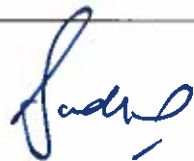
- i. approves the London Plan AMR framework for adoption as the framework for monitoring the London Plan 2021 as required by section 346 of the Greater London Authority Act 1999 (as amended), taking into account the accompanying Equality Impact Assessment (EqIA) and consultation summary report
- ii. delegates authority to the Assistant Director for Planning and Regeneration to make minor amendments to this framework when approving publication of Annual Monitoring Reports.

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:

31/5/22

¹ https://www.london.gov.uk/sites/default/files/london_plan_2021_sustainability_statement.pdf

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

Decision required – supporting report

1. Introduction and background

1.1. The Mayor's London Plan was formally published on 4 March 2021 (MD2594). Section 346 of the Greater London Authority (GLA) Act 1999 places a duty on the Mayor to monitor implementation of his Spatial Development Strategy (the London Plan) and collect data about issues relevant to its preparation, review, alteration, replacement or implementation. The Annual Monitoring Report (AMR) is the central document in the monitoring process and in assessing the effectiveness of the London Plan. It is important for keeping the London Plan under review and as evidence for future plan preparation.

1.2. The new monitoring framework is based on monitoring delivery against the six Good Growth objectives set out in Chapter 1 of the London Plan. These underpin the whole of the Plan and each individual policy. Chapter 12 of the London Plan sets out how the Plan will be monitored including the 12 key performance indicators (KPIs) that will be used. It also includes supporting text about how the Plan will be monitored, noting in paragraph 12.1.2:

"The KPI figures will be accompanied by commentary that may also include additional corresponding performance figures. The AMR will also monitor a range of other data that is relevant to understanding the implementation of the Plan in the wider context, and to inform future reviews of the Plan."

1.3. The Sustainability Statement was published alongside the London Plan in March 2021 setting out the monitoring requirements and context at Section 4.0. This noted:

"Following the publication of the final London Plan, the contextual indicators for inclusion in future AMRs will be consulted upon as described in paragraph 12.1.2 of the Publication London Plan December 2020."

1.4. The Sustainability Statement noted that a number of the Integrated Impact Assessment (IIA) objectives that applied to the London Plan would be monitored through other Mayoral Strategies and these are listed in Table 1 of that document. However, three aspects of the IIA were covered by neither the KPIs nor monitoring for other Mayoral Strategies. These aspects, which have now been included in the AMR Framework, are:

- average classroom size in primary school
- number and condition of designated heritage assets
- restoration of rivers and streams.

1.5. This is a new framework for monitoring the London Plan; its approach is novel and differs from previous monitoring frameworks as set out below. These changes are not prescribed in Chapter 12 of the London Plan. Whilst there is a statutory duty to monitor the London Plan, there is nothing to prescribe the way this duty is discharged. Specifically, not only does the new framework monitor against the KPIs set out in chapter 12 of the London Plan, and implement its focus on monitoring performance against the Good Growth objectives, but it also adopts the following principles:

- Only providing narrative where KPI targets are not achieved, rather than describing findings more broadly.
- Ensuring all data used for the AMR is in the public domain, to ensure the public can interrogate the base data themselves in the interest of openness and transparency.

- Reporting against the three pillars of sustainability: environmental, economic and social. This is a new approach enabling assessment of the delivery against cross-cutting themes. For example, many of the policies in the London Plan deliver social value, although the Plan does not use that specific term. This is a good mechanism to demonstrate and assess how effectively that value is being realised.
- Providing an opportunity annually for anyone to comment on the framework to ensure it remains up to date and responsive to community needs.

1.5 Once this AMR Framework is agreed by MD, future AMRs prepared in accordance with this framework, and changes to the framework (such as the datasets used to monitor the London Plan) will be delegated to the Assistant Director of Planning and Regeneration. Approval of any Annual Monitoring Reports prepared using this framework is already delegated to the Assistant Director of Planning and Regeneration under the General Delegation.

2. Objectives and expected outcomes

2.1. Adoption of the framework will provide a robust mechanism for monitoring the London Plan in accordance with section 346 of the GLA Act, Chapter 12 of the London Plan, and the Sustainability Statement published alongside the London Plan. The first full year of monitoring for the current London Plan will be the 19th AMR for the 2021-22 monitoring period, which is due for publication in Spring 2023.

2.2. As set out in the Consultation Summary, this framework has been designed to reduce the amount of text describing datasets and focus on narrative analysis, in order to assess performance against the good growth objectives; social, environmental and economic objectives; and unanticipated impacts on equality. Further, in the interests of openness and transparency, datasets will only be relied upon where the data is publicly available. To ensure value for money, the AMR will rely on data that is already monitored to ensure it is available without additional resource when the AMR is being prepared. It is noted that there is a significant amount of open-source data available sufficient to monitor the London Plan. Any 'one-off' data will be explored through the preparation of the evidence base to support the London Plan, rather than being committed to in the AMR.

2.3. As noted, the monitoring framework has been designed to report against the three pillars of sustainability, adapted to specifically reflect the London Plan. These are social value, sustainable environmental performance and inclusive economic growth. Annual reporting on these will be provided in narrative form, drawing on the findings of the KPIs; other data and performance measures set out in chapter 2 of the AMR; and the other datasets listed in chapter 8, which are not reported directly in the AMR.

2.4. Reporting on social value recognises that, in this context, social value is the delivery of good growth. This section of the framework provides an opportunity to discuss where social value outcomes have been better than expected or show improvement on past trends, or where performance has been poor; the reasons for this; and any measures for improvement. This responds to the recommendations of the Social Value Report prepared by the London Social Value Commission.

2.5. The framework also provides for narrative related to sustainable environmental performance. Although this will be picked up under the good growth sections in chapter 5, this provides an opportunity to consider the contribution of the London Plan beyond its requirements and in the wider context. Given the acceleration of measures needed to respond to the climate emergency it will be important to consider the wider context going forward, including the target of net zero to 2030.

2.6. Similarly, for inclusive economic growth, there are likely to be wider considerations outside of the remit of the London Plan which can usefully be discussed within the AMR such as the wider work of the Recovery Missions and significant macro-economic and socioeconomic trends, drivers or shifts.

3. Equality comments

- 3.1. The Mayor and the GLA are subject to the Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010. The London Plan and its policies plan for growth on the basis of its potential to improve the health and quality of life of all Londoners; to reduce inequalities; and to make the city a better place to live, work and visit. It uses the opportunities of a growing and changing city to plan for a better future; and for planning decision to be focused on improving London, transforming the city over time. It plans not just for growth, but for Good Growth – sustainable growth that works for everyone.
- 3.2. The London Plan was subject to full Equalities Impact Assessment (EqIA), incorporated into the IIA together with the Sustainability Appraisal and the Health Impact Assessment. These documents were published alongside the London Plan and can be viewed [here](#)²; the detailed EqIA tables, which were published for the examination in public, can be viewed [here](#)³. Performance of the London Plan and delivery of its objectives would be broadly expected to be in line with those assessments. It should also follow that an under-performance against an objective or policy area would also have disproportionate impacts on those people who share protected characteristics identified in the EqIAs.
- 3.3. Following consultation and preparation of the EqIA for the new AMR framework, an additional section has been added to chapter 6 of the framework relating to equalities. Whilst it is recognised that equalities outcomes should broadly follow the EqIA prepared for the London Plan, this new section provides a mechanism for reporting unexpected outcomes; or impacts on groups who share protected characteristics; or other equality considerations.
- 3.4. This new section will not revisit equalities impacts as a whole. Rather, it will focus on 'outlier' impacts. For example, the EqIA prepared for the London Plan identifies that delivery of affordable housing disproportionately impacts on people in relation to age, disability, race, religion, pregnancy and maternity, and income (not a protected characteristic, but also assessed in the EqIA). Therefore, if there was better than anticipated delivery of affordable housing, this could be expected to benefit all those groups. However, if it was found that one group was still failing to benefit from the additional affordable housing delivery, this would be the appropriate place to monitor and analyse that. Similarly, if there was an overall under-performance in affordable housing delivery, but one group seemed to be unaffected, this again would provide a mechanism to report that unanticipated outcome and explore the potentially contributing reasons and interventions. In preparing this section, it was acknowledged that it would not be possible to methodically review equalities outcomes for every policy; but it was felt that this would be an appropriate place to report unexpected outliers that have emerged in preparing the AMR or other work being undertaken by the wider GLA Group.

4. Other considerations

Consultation

- 4.1. Consultation was carried out between 14 December 2021 and 30 January 2022. There was a low rate of response: just 23 respondents. This may be because the framework is perceived as relatively abstract; it broadly covered the areas expected; or there is a lack of interest. It is also noted that available data changes over time. Therefore, in keeping with the commitment in London Plan GG1 to encourage early and inclusive engagement, it is considered appropriate to invite feedback and comments annually as part of the new AMR process. This can then inform development of the next

² <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

³ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan/eip-library/supplementary-information-equality-impact-assessment>

AMR, ensuring that the public have an iterative opportunity to help improve monitoring of the London Plan in accordance with the key principles set out in paragraph 1.4 above. This new section has been added to the copyright page; the opportunity to provide feedback will also be highlighted in publication notifications and website.

- 4.2. A number of responses sought changes or clarifications to the KPIs used within the framework. It was noted that the KPIs were adopted formally as part of the London Plan, and therefore could not be changed. However, clarifications of the KPI reporting were made; where appropriate, other data requested was added to chapter 2, which details the broader data and performance measures.
- 4.3. Responses also sought additional data to be included in chapter 2 and regularly reported. Where these datasets are readily available, in the public domain and not reported elsewhere (e.g through monitoring of other Mayoral strategies) they have been included in the framework. It is also noted that whilst design quality is very important to delivery of the London Plan, there are no consistent mechanisms for auditing and reporting across London.

Risks

- 4.4. There are limited risks to the adoption of this framework, as much of the key information is prescribed in Chapter 12 of the London Plan, which has undergone a full statutory process. This includes the move to monitoring performance against the Good Growth objectives rather than individual policies. As this framework proposes only using information within the public domain, rather than drawing on all the information available to the GLA when preparing the AMR, there is a risk of criticism. However, on balance it is considered that an immutable principle of transparent source information is more important than being able to draw on the findings of all of the information available to the GLA. It may also promote others to make more information publicly available, so it can help inform future AMRs.

Relationship with other Mayoral strategies and priorities

- 4.5. Care has been taken to avoid duplication of information, which will be monitored and reported for other Mayoral strategies. However, it is likely that this will be reflected in the narrative text as appropriate, reflecting shared objectives. Mayoral priorities will also be addressed where these align with the monitoring framework e.g. delivery of genuinely affordable housing, but overall this framework is not directed towards that purpose.

5. Financial comments

- 5.1. There are no direct financial implications for the GLA arising from this decision.

6. Legal comments

- 6.1. The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 (the Act). Section 334 of the Act requires the Mayor to prepare and publish the London Plan and section 346 of the Act requires the Mayor to monitor the implementation of this London Plan. This MD seeks authority to establish a novel monitoring framework to ensure that the London Plan is monitored using principles that are clearly set out within this framework, in accordance with Chapter 12 of the London Plan and the [Sustainability Statement](https://www.london.gov.uk/sites/default/files/london_plan_2021_sustainability_statement.pdf)⁴ that was published alongside the Plan.
- 6.2. In taking the decision requested, the Mayor must have due regard to the Public Sector Equality Duty. To this end, the Mayor should have particular regard to section 3 of this report.

⁴ https://www.london.gov.uk/sites/default/files/london_plan_2021_sustainability_statement.pdf

7. Planned delivery approach and next steps

Activity	Timeline
Notification of the adoption	May 2022
Publication (including supporting documents)	May 2022
Preparation of the first AMR using this template	Spring 2023

Appendices and supporting papers:

Appendix A: AMR framework – clean version

Appendix B: AMR framework – tracked changes version

Appendix C: AMR framework consultation summary report

Appendix D: AMR framework Equality Impact Assessment

Public access to information

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

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

Part 1 - Deferral

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

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under 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:

Lisa Fairman 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.

✓

Corporate Investment Board

This decision was agreed by the Corporate Investment Board on 23 May 2022.

✓

EXECUTIVE DIRECTOR, RESOURCES:

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

Signature

Date

D. Gene

23/5/22

CHIEF OF STAFF:

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

Signature

Date

D. Bellamy

23/5/22

