Sakina Sheikh AM Chair of the London Assembly Planning and Regeneration Committee C/o sarah-jane.gay@london.gov.uk Our ref: MGLA180322-7306

**Date:** 2 August 2022

Dear Sakina,

Thank you for the London Assembly Planning and Regeneration Committee's letter of 17 March regarding Opportunity Areas (OAs) and Housing Zones (HZs) and notifying me of the meeting that the committee held with the listed guests on 8 February 2022.

I apologise for the delay in responding to you. Please find my response to each of the recommendations in the annex below.

Yours sincerely,

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Sadiq Khan Mayor of London

#### Annex

#### Mayor of London's response to the recommendations of the London Assembly Planning and Regeneration Committee's investigation on Opportunity Areas and Housing Zones

#### **Recommendation 1**

The Mayor should work with boroughs to ensure that residents, businesses and community groups are engaged and involved in the planning process within Opportunity Areas. This should include at the stage where the Opportunity Area is being designated.

#### **Overview**

#### London Plan engagement

- 1.1 The London Plan was subject to two<sup>1</sup> rounds of public engagement and formal public consultation in 2016-2018. The designation of Opportunity Areas (OAs) formed part of the consultation.
- 1.2 A Draft New London Plan was then subject to an Examination in Public (EiP)<sup>2</sup> in 2019. At the EiP the Draft New London Plan and supporting evidence base were examined by a panel of independent Inspectors appointed by the Secretary of State. More than 300 different organisations or individuals participated in the EiP, including community groups. The Panel of Inspectors were satisfied with the level of consultation undertaken to produce the draft London Plan.
- 1.3 The EiP featured a Hearings Programme and technical seminars. These enabled people to participate in the EiP, having submitted a written statement. The EiP Hearings included a session on OAs (see below 1.4). All EIP sessions were held in City Hall and were open to the public. They took the form of structured discussions, where all participants had the opportunity to speak and were led by one or more of the Panel members relating to the defined matters.
- 1.4 A half-day EiP session was held on OAs on Wednesday 23 January 2019<sup>3</sup>. The session set out the process of designating OAs, with discussion on issues including flood risk, character and appearance, and strong and inclusive communities. The private sector, public, and amenity groups were all represented. Representations were made by Ballymore Group, Canary Wharf Group, Environment Agency, Home Builders Federation, Just Space and London Forum of Amenity and Civic Societies amongst others, including representatives from London boroughs and the London Assembly Planning and Regeneration Committee.

<sup>&</sup>lt;sup>1</sup> Early engagement to inform the full review started in March 2016. Draft London Plan Consultation took part between December 2017 and March 2018.

<sup>&</sup>lt;sup>2</sup> For further details, please refer to the link below:

https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/examination-public-draft-new-london-plan

<sup>&</sup>lt;sup>3</sup> For further details, please refer to the link below:

https://www.london.gov.uk/sites/default/files/lp\_agenda\_day\_5\_23\_january\_2019\_am.pdf

1.5 The Examination process led to a Panel Report<sup>4</sup> that gathered all the findings and recommendations from the EiP Hearing. This was submitted to the Inspector in October 2019. The section of the Panel Report concerning OAs states that the Panel were satisfied that the Draft New London Plan provided *'an effective strategic framework to help deliver Good Growth in Opportunity Areas'*. The Panel Report also highlighted the need for boroughs to *'effectively engage and collaborate with local communities to devise plans, strategies and initiatives for these Strategic Regeneration Areas'*.

### **Planning in Opportunity Areas**

- 1.6 The London Plan designates 47 OAs <sup>5</sup>. The process of identifying and designating OAs is undertaken in collaboration with local planning authorities (LPAs).
- 1.7 The specific boundary of an OA is defined and 'adopted' within either:
  - A planning document that forms part of a local planning authority's development plan (Local Plan/Area Action Plan (AAP)/Supplementary Planning Document (SPD)) that has been subject to public consultation, independent examination in the case of a Local Plan or AAP and formal adoption by a local planning authority, or
  - via an Opportunity Area Planning Framework (OAPF) which would be adopted by both the Mayor and the LPA. OAPFs are produced by the Greater London Authority (GLA), Transport for London (TfL) and local planning authorities working in partnership and are also subject to formal public consultation.

Where a boundary is adopted in an SPD or OAPF, it would also have to go through a Local Plan process to include on the Policies Map and therefore give it full weight as a material consideration.

- 1.8 Whether an LPA manages the public consultation process for a plan in an OA or works closely with the GLA and TfL on an OAPF consultation, the process of planning for OAs is close to local communities and their everyday challenges. Conformity with LPA Statements of Community Involvement (SCIs) should ensure transparency and public outreach.
- 1.9 The Mayor has been working with LPAs to seek to ensure that meaningful early engagement and extensive public consultation is part of the process of planning within OAs. This has included providing officer support to plans within OAs such as the Neasden SPD and Old Kent Road AAP. The Old Kent Road OA Community Review Panel<sup>6</sup> is an example of a local community being closely involved in steering change in an OA.
- 1.10 The Mayor's Social Integration Strategy, and subsequent Social Integration Lab case studies<sup>7</sup>, also provide guidance for LPAs in engaging local communities with planning.

<sup>6</sup> See <u>https://oldkentroad.org.uk/crp</u>

<sup>&</sup>lt;sup>4</sup> For further details, please see below:

https://www.london.gov.uk/sites/default/files/inspectors\_report\_and\_recommendations\_2019\_final.pdf

<sup>&</sup>lt;sup>5</sup> The first 24 were designated in 2004 in the first London Plan (LP). These were subsequently added to, with 8 in 2008, 3 in 2011, 5 in 2016 and a further 7 in 2021.

<sup>&</sup>lt;sup>7</sup> <u>https://www.london.gov.uk/sites/default/files/mayor\_of\_london\_social\_integration\_design\_lab\_2019\_programme\_report.pdf</u>

### **OAPF engagement**

- 1.11 Since the London Plan EiP, efforts have been made to expand the scope, range, and depth of consultation on London Plan Guidance (LPG), including OAPFs. Recent OAPFs like the Royal Docks & Beckton Riverside OAPF and Thamesmead & Abbey Wood OAPF, have therefore benefitted from extensive stakeholder and community engagement. This has sought to involve a broad cross-section of the community and raise awareness of OAs and OAPFs amongst the public, making use of online consultation tools, in-person workshops, social media and mail-outs.
- 1.12 The Thamesmead & Abbey Wood OAPF was informed by an 8-week early engagement, which took place prior to a formal 10-week period of public consultation. Both rounds of consultation included local events and virtual sessions such as pop-up stalls, community workshops, 1-2-1 meetings, youth sessions at local schools and a dedicated OAPF consultation website. An Engagement and Consultation Summary report for Thamesmead & Abbey Wood was published alongside the adopted OAPF.
- 1.13 The Royal Docks and Beckton Riverside OAPF has featured three rounds of public engagement and consultation during 2019/2022. This has built on the experience gained at Thamesmead & Abbey Wood. An early-stage public engagement took place between June October 2019 in collaboration with TfL, LB Newham, and the GLA Royal Docks Team. This was followed by an 8-week public engagement on a draft OAPF vision and principles. A formal 6-week public consultation on a draft Royal Docks and Beckton Riverside OAPF was undertaken in February March 2022.
- 1.14 It is intended that this approach to engagement involving the diverse communities in local areas and ensuring that they inform the evolution of OA policy and guidance continues to form the basis of any future work.

### OAPF Integrated Impact Assessment (IIA)

- 1.15 As LPG, OAPFs are accompanied by an IIA. The IIA combines a number of assessments of the impact of an OAPF, and includes:
  - Strategic Environmental Assessment (SEA)
  - Sustainability Appraisal (SA)
  - Equalities Impact Assessment (EqIA)
  - Health Impact Assessment (HIA)
  - Community Safety Assessment (CSA)
  - Habitats Regulation Assessment (HRA)
- 1.16 The IIA and IIA Scoping Report that precedes it are both subject to public consultation. A draft IIA is published for public consultation alongside the formal consultation draft OAPF. Responses are then acknowledged in the final IIA, which forms part of the adopted OAPF.
- 1.17 The IIA Scoping Report, which precedes the draft IIA, sets out the proposed scope of issues to be addressed in the IIA and the approach to be undertaken in assessing them. The IIA Scoping Report is issued for a 5-week public consultation in advance of the publication of the draft OAPF and draft IIA.

#### **Opportunity Area webpages: ongoing engagement**

- 1.18 The OA section of the London Plan website was updated in 2021. The webpages present the latest information on the status, planning context, transport investment and rate of development in each OA.
- 1.19 The updated OA webpages are intended to help support engagement in the process of planning OAs by making information more welcoming and accessible. Maps and live infographics provide user-friendly information and seek to make strategic planning in London more accessible. The public are invited to submit suggestions and queries on the data presented.
- 1.20 The recent website update is the initial phase of a longer-term project to present both OA data and strategic planning in a clearer and more compelling manner<sup>8</sup>. This project will enable GLA Planning to plan OAs in an increasingly inclusive and easy to understand manner; review and analyse their progress; and facilitate collaboration and investment in OAs.

#### Recommendation 2

The Mayor should collect and share examples of best practice in community engagement in Opportunity Areas (e.g. the community review panel in Old Kent Road).

### Overview

- 2.1 Early and meaningful engagement and extensive public consultation is a key component of the preparation of an OAPF. London Plan Policy SD1 Opportunity Area aims to "ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development."
- 2.2 The GLA has been exploring different approaches, including embracing digital tools, to ensure that communities are being heard, even amid the pandemic where face-to-face engagement was not possible. Recent OAPFs<sup>9</sup> including Royal Docks & Beckton Riverside OAPF, Thamesmead & Abbey Wood OAPF, and Isle of Dogs OAPF have benefitted from extensive stakeholder and community engagement that has sought to involve a broad cross-section of the community.
- 2.3 A future update of the OA website will include a collection of best practice engagement and public consultation examples in OAs. Lessons learnt will feature best practice from GLA OAPF engagement methods, but also look into engagement tools and approaches from the boroughs as part of the development of SPDs, AAPs etc in OAs.
- 2.4 The GLA is currently drafting a Planning Engagement Core Principles document. This will set out the core principles of how the GLA involves Londoners in the planning process, being clear on what Londoners can expect from the planning service.
- 2.5 At present there is limited data or evidence about who gets involved in the planning process, and at what stages, and what the reasons for that are. Through programmes such as Planning for London, we will seek to gather data, understand barriers and learn about,

<sup>&</sup>lt;sup>8</sup> For more information, please refer to Recommendation 3.

<sup>&</sup>lt;sup>9</sup> For more information, please refer to Recommendation 2.

develop and implement best practice to try to address this. Actions arising from this analysis would be taken forward in future iterations of the London Plan and associated LPG.

#### **Current Best Practice:**

#### Thamesmead & Abbey Wood OAPF

2.6 The development of the Thamesmead & Abbey Wood OAPF in 2019/2020 was informed by two phases of public engagement. An 8-week early engagement was undertaken prior to a 10-week formal public consultation. Both phases featured stalls at live events and locations within the OA, an exhibition with Peabody, community and stakeholder workshops, one to one meetings, and youth sessions at local schools. A dedicated consultation website, promoted via social media, was available throughout the development of the OAPF. An Engagement and Consultation Summary report for Thamesmead & Abbey Wood<sup>10</sup> was published alongside the OAPF.

#### **Royal Docks & Beckton Riverside OAPF**

- 2.7 The Royal Docks and Beckton Riverside OAPF has featured three rounds of public engagement and consultation during 2019 to 2022. This has built on the experience gained at Thamesmead & Abbey Wood. An early-stage public engagement took place between June October 2019 in collaboration with TfL, LB Newham and the GLA Royal Docks Team. This included 15 pop-up events, 8 community sessions, 60 one to one meetings, 4 youth sessions, and a dedicated engagement website, with 1,738 people engaged during the process.
- 2.8 A 6-week period of engagement on the draft Vision and Principles took place in October/November 2020.<sup>11</sup> This included 4 webinars, one to one stakeholder meetings, a dedicated Vision and Principles engagement website, and (despite the COVID-19 conditions), two in-person youth workshops. The feedback received has informed the development of area-based strategies and proposals in the OAPF. The summary of the findings was published as an appendix accompanying the draft OAPF in February 2022<sup>12</sup>.
- 2.9 The Vision and Principles engagement attracted 372 respondents via the online platform Commonplace, with 1,120 reading the content, and 2,345 visiting the website. Over 70,000 leaflets were delivered, attracting 216 responses. 100 people attended online engagement events, whilst 35 young people attended a dedicated workshop. Discussions were held with several stakeholders including utility providers, the Port of London Authority, Historic England and landowners. These also attracted 18 written responses.
- 2.10 Formal public consultation on the draft OAPF took place between February March 2022. This was entirely online because of the pandemic and included three webinars, one in-person workshop with a local group that focuses on public space in the Royal Docks, a presentation to the Royal Docks Developers Forum, targeted meetings with a range of stakeholders, and a new dedicated consultation website. The website was structured around an interactive 'Places' map encouraging people to share their views and feedback on the places in which they live, play and work.

<sup>&</sup>lt;sup>10</sup> Engagement and Consultation Summary report for TAW OAPF (2020)

<sup>&</sup>lt;sup>11</sup> RD+BR Early Engagement Report (2019)

<sup>&</sup>lt;sup>12</sup> V+P Engagement and Consultation Summary (2021)

- 2.11 Considering the potential limitations of an all-digital approach, the Mayor worked together with the Royal Docks Team and LB Newham to increase reach and participation in the events and platforms through a blended approach that included delivery of over 70,000 door-to-door flyers and a dedicated social media campaign.
- 2.12 Apart from the area-based surveys, the Mayor reached out to communities to understand what delivery means to residents and businesses, and how they could best be included in implementing the OAPF.





2.13 In alignment with the Good Growth principles<sup>13</sup> and the community wealth building strategy<sup>14</sup> promoted by LB Newham, the public consultation invited communities and stakeholders to contribute to the way the OAPF will be delivered in the coming years by responding to some concrete preliminary suggestions, but also welcoming original thoughts and ideas.

### WE'VE BEEN LISTENING TO THE COMMUNITY THROUGHOUT



Figure 2 Extract from RD+BR consultation material showing the different stages of engagement

<sup>&</sup>lt;sup>13</sup> For more information on Good Growth, please refer to the London Plan 2021:

https://www.london.gov.uk/sites/default/files/the\_london\_plan\_2021.pdf

<sup>&</sup>lt;sup>14</sup> For more information, please refer to: <u>https://www.newham.gov.uk/council/community-wealth-building/2</u>

#### **Recommendation 3**

The Mayor should monitor and publish data giving a breakdown of housing tenure and size in each Opportunity Area. This should include data on demolitions as well as new homes.

- 3.1 The London Planning Datahub is the GLA's main source of development data. The Datahub holds detailed information on planning applications, permissions, commencements and completions in Greater London. This enables the tracking of development progress across London. Information on tenure, size of scheme and use class is provided. It must be noted, however, that the data received is supplied by applicants for planning permissions and may be subject to some inherent issues and errors.<sup>15</sup>
- 3.2 The OA website draws data from the Datahub. It currently includes data on homes and jobs delivery in OAs, measured against London Plan indicative capacities, homes completions and delivery of affordable housing.
- 3.3 A future website update will include data covering other important metrics on the progress of the OA. The Planning and Regeneration Committee will be updated when this happens.
- 3.4 New data will include:
  - housing tenure breakdown<sup>16</sup> by size scheme,
  - data on non residential floorspace completions and/or approvals (including social infrastructure)<sup>17</sup>

Figure 3 Indicative OA website Update timeline

Short term ──── Long term			
OA map and website refresh with live development progress data from DataHub	Publish a <b>OAMR short</b> summary of findings that give an up-to-date picture of OAs	<b>Online tool/data</b> <b>service</b> – discovery phase	<b>Digital OAPF</b> – web based planning frameworks

3.5 The OA website does not currently collect data on demolitions in the OAs. Whilst rates of demolition might be a useful measure of change in OAs, accurate measurement presents challenges. Demolition does not necessarily require planning permission, or forms part of a larger planning application. Consequently, there is not a readily accessible source of accurate data. The increasing frequency of retrofits and refurbishments (in line with Circular Economy principles) may also see total demolition become less clear as a measure of change.

<sup>&</sup>lt;sup>15</sup> For more information on The London Datahub, please see refer to: <u>https://www.london.gov.uk/what-we-</u> do/planning/digital-planning/planning-london-datahub

<sup>&</sup>lt;sup>16</sup> Data available in detailed 'tenure breakdown' (Affordable Rent – Not at LAR benchmark rents), Discount Market Rent, Discount Sale, Intermediate, Intermediate Other, London Affordable Rent, London Living Rent, London Shared Ownership, Market for rent, Market for sale, Shared Equity, Social Rent, Starter Homes, Tenure not known), and in 'tenure groups' (Intermediate tenures, Low cost rent, Market, Tenure not known).

<sup>&</sup>lt;sup>17</sup> For more details on social infrastructure monitoring in the OAs, please refer to Recommendation 4.

### **Recommendation 4**

The Mayor should explore options for monitoring and publishing more detailed information relating to outcomes in each Opportunity Area. This should include data relating to community services.

#### Overview

- 4.1 The performance of OAs against London Plan Key Performance Indicators (KPIs) will be detailed in the London Plan Annual Monitoring Report (AMR)<sup>18</sup>. Between December 2021 and January 2022, the GLA consulted on a new AMR framework<sup>19</sup> for the London Plan 2021. This is expected to be used for the first AMR for the London Plan 2021 to be published in Spring 2023.
- 4.2 The consultation on a new London Plan AMR framework included a section on OAs, and proposed that OA data will include:
  - Cumulative housing approvals and completions since OA designation
  - Percentage of housing approved as affordable housing
  - Cumulative non-residential floorspace approvals and completions since OA designation
  - Percentage of Use Class E approved as affordable workspace
  - OA planning policy mechanisms by OA developed during the year
  - Total percentage housing completed across London within an OA for every year since 2004, and by borough
- 4.3 As a result of the consultation, additional KPIs for OAs will include:
  - Changes to green space designations
  - Comparison of data to the indicative homes and jobs to the OA in OAPFs and Local Plans
  - New social infrastructure
  - Use of design review panels for major applications
  - Narrative relating to performance to deliver homes or key infrastructure.
- 4.4 In addition to the London Plan AMR, development trends and performance within and across OAs will be considered in an 'Opportunity Area Monitoring Summary Report'. This will be published periodically on the OA website, and will inform the formal AMR OA section described above.

### Monitoring Social Infrastructure in OAs

4.5 To support monitoring of development in OAs, the GLA is currently working on publishing detailed information on completions and approvals of community and social infrastructure floorspace in each OA.

 <sup>&</sup>lt;sup>18</sup> For more on the latest AMR, please refer to: <u>https://www.london.gov.uk/sites/default/files/amr\_16\_final.pdf</u>
<sup>19</sup> For more on the new AMR template, please refer to:

https://www.london.gov.uk/sites/default/files/amr\_framework\_london\_plan\_template.pdf

- 4.6 The Mayor is committed to ensuring that OAs deliver social benefits to local communities in alignment with the Good Growth principles. Initial analysis of delivery of social infrastructure in OAs<sup>20</sup> suggests that:
  - 1/3 of the approved net floorspace for Use class D in London since 2004 falls within the OAs.
  - OAs provided almost half of the completed net floorspace for Use class D in London since 2004.
- 4.7 OA data will be presented to the public via:
  - <u>OA website</u>: A dedicated section on social infrastructure will be included on the next OA website update later in 2022. Each OA webpage will feature interactive infographics that will provide data on social infrastructure, including but not limited to the following: Net floorspace of social infrastructure completed/approved in OAs since OA designation (individual OA year progress and cumulative comparator across OAs since designation)
  - <u>OA Monitoring Summary Report</u>: As mentioned in 4.4, to support the London Plan AMR a summary analysis of development in OAs will be published periodically. This will identify development trends, patterns and observations both within OAs, and at a London scale. Data will include social infrastructure i.e., a map showing floorspace of social infrastructure gained since OA designation, and as a percentage of the social infrastructure gained in the respective borough. This data will inform the social infrastructure data in the London Plan AMR.

#### Recommendation 5

The Mayor should explore options for carrying out a full evaluation of Opportunity Areas, which assesses outcomes within Opportunity Areas against original objectives and compared with equivalent sites in London which have not received Opportunity Area designation. This should include exploring the impact on local residents and businesses and the potential for gentrification and regeneration in Opportunity Areas.

### Overview

- 5.1 Given the complex and heterogenous nature of OAs, with each OA presenting a different opportunity/challenge and being at a different stage in the development cycle it would not be meaningful to carry out a full evaluation of all OAs.
- 5.2 Data and monitoring progress on OAs is currently published through the OA webpages, which offer a live platform to collect and visualise information and compare between OAs and the rest of London. The OA webpages provide a useful insight into aspects such as the policy status and housing delivery in the OAs. In the short term, additional data on individual OAs<sup>21</sup>, and a short summary of findings will be published across the OAs at a pan-London scale. New ways of measuring progress in the OAs through the lens of Good Growth will be explored, making particular use of transport and census data <sup>22</sup>.

<sup>&</sup>lt;sup>20</sup> Data extracted from the Planning Datahub and is correct at the time of the publication.

<sup>&</sup>lt;sup>21</sup> See Recommendations 3 and 4 above.

<sup>&</sup>lt;sup>22</sup> For more information on Good Growth, please refer to the London Plan 2021:

https://www.london.gov.uk/sites/default/files/the\_london\_plan\_2021.pdf

- 5.3 Initial analysis of current OA data provides some insights into the role of OAs in delivering affordable homes. This includes highlighting several boroughs where OAs accommodate the majority of affordable homes completed in the borough as a whole:
  - More than 30% of all affordable housing delivery in London has been delivered in OAs since 2004.
  - In boroughs like Hackney, Barnet, Newham, Tower Hamlets and Greenwich more than 50% of the affordable homes that were completed in the borough are within an OA.

#### Measuring Good Growth in OAs

- 5.4 To understand the impact of the London Plan, the Mayor is legally required to keep the London Plan under review. KPIs and the approach to monitoring the Plan is set out in its final chapter and provides the basis for an ongoing and iterative assessment of the effectiveness of the Plan. Performance against the KPIs is reported in the statutory AMR, which is published each spring.
- 5.5 In addition to monitoring the progress of homes, jobs and infrastructure, the AMR will also monitor a range of other data that relates to the Good Growth objectives and the vision for London to be socially and economically inclusive and environmentally sustainable. These will be measured through a combination of KPIs listed in Table 12.1 of the London Plan 2021 and other performance measures that will be developed as part of the London Plan AMR.
- 5.6 London Plan AMRs include a section on OAs<sup>23</sup>, which references the upcoming OAs Monitoring Report (OAMR) that GLA Planning are currently developing<sup>24</sup>. The main objectives of the OAMR are to:
  - Review and analyse OAs to give a current picture of their progress so far
  - Identify key patterns of growth in OAs on a pan-London scale
  - Inform and enrich future strategic-scale planning
  - Conduct comparative analysis of individual OAs
  - Understand the impact of OA designation
  - Feed into other evaluation processes (e.g. London Plan AMR) and impact assessments around development
- 5.8 As mentioned in response to Recommendation 3, the next milestone of the OAMR is the publication of a short summary of OA findings in summer/autumn 2022. This will include reference to social infrastructure and homes approvals across OAs. This additional data will expand the knowledge base and contribute to the understanding of OAs and their impact. This study will inform the section on OAs as set out in the new AMR framework template that the Mayor recently consulted upon.

<sup>&</sup>lt;sup>23</sup> 'The OAMR will report on the status of London's many OAs and will include a survey of actual and forecast growth in homes and jobs, as well as the types of plans being used to direct their delivery. The purpose of the OAMR is to show how coordination across boroughs and I's agencies unlocks and accelerates growth opportunities. London's OAMR will also support the monitoring and review processes set up within many OAs to ensure supporting infrastructure is delivered at a complementary pace to growth in new homes and jobs.'

<sup>&</sup>lt;sup>24</sup> See Recommendations 3 and 4 above.

### **OAPF IIAs and EqIA**

- 5.10 As described in 1.8-1.10, OAPFs are accompanied by Integrated IIAs which include an EqIA. The EqIA is useful in establishing the existing socio-economic character of an OA and assessing the potential impact of the vision set out in the OAPF. The EqIA is therefore a useful tool in measuring the potential for regeneration in an OA.
- 5.11 The EqIA is two-stage process:

**Stage 1, screening**: the impacts of the proposed new policies are assessed against a defined set of protected characteristics. If no negative effects are identified during screening, no further assessment is required. If there are effects that cannot easily be mitigated, a full EqIA will be undertaken.

**Stage 2, full EqIA**: an in-depth assessment of the impacts of any policies which cannot easily be mitigated, the recommendation of mitigation measures, definition of monitoring and evaluation measures and public consultation.

- 5.12 The EqIA identifies the potential to alter the opportunities of certain groups of people, and/or the effect on relationships between different groups of people that could arise as a result of the proposed new policies.
- 5.13 Although low-income groups are not identified within the 'protected characteristics' under the Equality Act (2010), they are typically included in OAPF assessments because low income and deprivation typically overlap with other equalities characteristics and form relevant considerations in the context of achieving inclusive growth. Similarly, working patterns are typically included within the identified equalities groups, to ensure that adequate consideration is given to residents undertaking shift work, including night shifts. This type of working can disproportionately be undertaken by low-income communities, and forms part of the wider equalities assessment.
- 5.14 In line with the statutory requirements of the Equality Act (2010), the IIA and EqIA give due regard to the need to remove or minimise disadvantages, discourage discriminatory practices and proactively accommodate the needs of equalities groups. This is carried out by identification of groups, which may be disproportionately impacted because of policy implementation, along with recommending how policies could be strengthened to promote equitable opportunities. The key IIA guide questions serve to assess the multiple dimensions of inequality, disadvantage and discrimination, and ensure policies are promoting inclusive, accessible and equitable opportunities across higher risk groups.

### **Travel in London Report**

5.15 Connecting places with sustainable infrastructure and improving local and wider connections is another key aspect of Good Growth. Dedicated public transport and walking and cycling provision are crucial to creating healthy, inclusive and attractive places. Progress toward sustainable transport aspirations in OAs is measured against the Transport Principles of Good Growth, with the Mayor presenting progress and data in the Travel in London report<sup>25</sup>.

<sup>&</sup>lt;sup>25</sup> For more please refer to: <u>https://content.tfl.gov.uk/travel-in-london-report-14.pdf</u>

- 5.16 The latest Travel in London report includes a section on monitoring good access to public transport in OAs (Chapter 3, page 168). The results indicate that work to improve public transport and encourage active travel (walking and cycling) in OAs by aligning growth with accessible locations, is having some success. This is measured against the Mayor's Transport Strategy (MTS) Good Growth principle of "Good access to public transport" in OAs.
- 5.17 The Mayor is exploring ways of monitoring progress in OAs against the other MTS good growth metrics in future Travel in London reports and potentially on the OA website. These metrics will help in understanding the impact of OA designation for existing and new communities.
- 5.18 The metrics include:
  - High-density, mixed-use developments
  - People choosing to walk and cycle
  - Car-free and car-lite places
  - Inclusive, accessible design
  - Carbon-free travel
  - Efficient freight

#### The Planning for London Programme:

- 5.19 The Mayor does not intend to review the London Plan in this Mayoral term. However, in anticipation of a future review of the London Plan, which will be required by national planning policy, the Planning for London Programme has been established<sup>26</sup>.
- 5.20 Through the Planning for London Programme. The Mayor has started gathering evidence, capturing the views of stakeholders, and identifying issues and options that a future review of the London Plan could consider. The programme will identify contemporary trends and challenges in London's development and identify potential aspects of the evidence base.
- 5.21 Planning for London includes an extensive programme of inclusive public engagement. This is aimed at identifying and integrating the views of a diverse range of Londoners. This public engagement programme, which includes online and face-to-face events and workshops, will offer a forum for early and meaningful engagement on aspects of regeneration, including OAs.
- 5.22 The Programme will run throughout 2022 and potentially beyond. An initial phase of engagement is now hosted on Talk London<sup>27</sup>, an online community of over 62,000 Londoners, giving the opportunity to communities to take a leading role in shaping a future London Plan.
- 5.23 Later phases starting this summer will enable more detailed discussions on specific issues, including key long-term challenges facing London and the range of options and approaches that could help address them. The Mayor will ensure that findings will inform the discussion of the role and contribution of the OAs to London moving forward.

<sup>&</sup>lt;sup>26</sup> <u>https://www.london.gov.uk/what-we-do/planning/planning-london-programme</u>

<sup>&</sup>lt;sup>27</sup> https://www.london.gov.uk/talk-london/planning-londons-future

#### Planning for London and Opportunity Areas

- 5.24 The Planning for London Programme offers an opportunity to evaluate the impacts of OA designation using the data currently gathered via the Datahub and monitoring LPA planning for OAs. This will include assessing outcomes within OAs against original objectives in the London Plan.
- 5.25 The Planning for London Programme is also an opportunity to reflect on potential future requirements, criteria or performance measurements for OAs.

#### Recommendation 6

The Mayor should examine, evaluate, and publish total GLA spend on the Opportunity Area programme and how these funds have been spent.

- 6.1 OAs are a London Plan planning designation, and not a programme that receives or provides dedicated funding. Consequently, there is no designated funding pot at City Hall for OAs, and the GLA has no OA dedicated funding scheme.
- 6.2 GLA Planning is responsible for monitoring OAs and leads on producing OAPFs where required, in partnership with TfL, and the boroughs. The team also scrutinises and advises on planning documents for OAs produced by the boroughs. The team is funded in part through the core London Plan budget and in part through pre-application income. Developer contributions in the form of Planning Performance Agreements (PPAs) were secured to support the production of the draft Royal Docks & Beckton Riverside OAPF. This was approved under Mayoral Direction MD2475.

#### Recommendation 7

The Mayor should publish the findings of the internal reviews that have been carried out into Housing Zones and explain how these have informed the development of the Housing Zones programme and other housing schemes.

The Mayor initiated a review of Housing Zones in July 2016, to look at ways in which the levels of affordable housing could be increased, and the contracting process streamlined for London boroughs. The review was not published as boroughs expected individual discussions on interventions to remain confidential. However, the principal outcome was the Housing Zones revenue programme, published at DD2144 Housing Zones revenue bids | London City Hall.

#### **Recommendation 8**

Given that the Housing Zones programme is coming to an end, The Mayor should commission an independent evaluation of the programme, in order to learn from its successes and failures and inform future projects.

This recommendation has been carefully considered. Housing Zones were a legacy programme from the previous mayoralty and have not delivered their expected outcomes in full. Each of the interventions has been subject to robust scrutiny and the full range of mayoral tools and programmes used to maximise affordable housing and wider objectives including jobs and good growth. As discussed with the committee, the Land Fund and input to the Housing Infrastructure Programme are examples of the learning from the programme. As the Land Fund is already operating successfully and outputs from the Housing Zone programme have been optimised, the Mayor does not consider an independent review to be necessary.