

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD2992

Title: Planning for London Programme – engagement ahead of a future London Plan

Executive Summary:

The Planning for London Programme has been established to start early preparations for a future London Plan review after this Mayoral term, in line with the National Planning Policy Framework. It creates the opportunity to ensure that a genuine cross-section of Londoners' perspectives and experiences are at the heart of the future direction of London's built environment. The Programme will provide the space to explore longer-term spatial development and related challenges with Londoners; explore different perspectives; and support the Mayor's commitment to involve communities in planning.

This decision seeks approval of expenditure of up to £305,000 on services required to enable the Planning for London Programme to carry out a series of engagement and consultation events, including in-depth deliberation with a representative group of Londoners and wider online consultation. This engagement and consultation will be delivered with some agency support.

Decision:

That the Mayor approves expenditure of up to £305,000 during the financial year 2022-23 on:

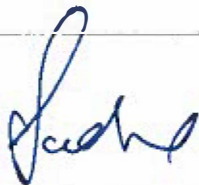
- i) specialist professional support required to develop content for, organise and run a series of deliberative engagement and consultation events with a representative group of Londoners (£200,000)
- ii) services required to produce digital content, run stakeholder events and carry out programme management (£105,000).

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:

8/7/22

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

Decision required – supporting report

1. Introduction and background

- 1.1 The London Plan 2021 provides an up-to-date policy framework for London and we are not reviewing the Plan during this Mayoral term. However, the National Planning Policy Framework (NPPF) advises that plans should be reviewed every five years. As reviews of the London Plan are a significant task which take several years, the Planning for London Programme has been established to start early preparations now. The programme will allow us to start gathering evidence; capturing views of stakeholders; and identifying issues and options that a future review of the London Plan could consider. It will collate and report on its findings, though will not make definitive recommendations as to what a future London Plan should contain. These findings will help inform the development of a new or updated Plan after the end of this Mayoral term.
- 1.2 By starting this process now, we have the opportunity to put Londoners' perspectives and experiences at the heart of the thinking about how we plan for London in the future and that will inform the next London Plan. Early, meaningful and high-quality engagement offers Londoners from all backgrounds the chance to shape the direction London takes. This is a critical part of delivering the Mayor's commitment to increase involvement of communities in the planning process and supporting London Plan Good Growth Objective 1. It is vital that this involvement includes the plan-making stage, as this has a major influence on how individual planning applications are assessed.
- 1.3 To achieve this level of ambition, however, we need a programme of engagement that actively reaches out to a genuine cross-section of voices. We need high-quality, easy-to-understand materials to deliver our aims in a way that is open and inclusive. By providing Londoners with the space and support to explore long-term spatial development and related challenges, we can create a robust evidence base for a future London Plan that includes the views of Londoners from all backgrounds.
- 1.4 In March 2022, we used Talk London to start this process with a survey and five discussion threads on some high-level questions relating to challenges facing London (including the built environment; inclusion; the climate crisis; and families and young people). Over 800 people took part in the survey and 235 comments were left, with the most mentioned topics being affordable housing, green spaces and transport.
- 1.5 We now want to continue our engagement beyond this initial activity and move into phases where we can consider greater levels of detail. We are therefore proposing a programme comprising:
 - a series of deliberative engagement events with a representative group of Londoners
 - the development of more visually engaging and accessible content to support participants' understanding of the issues and to engage a wider group of Londoners via Talk London, those registered to be kept informed of the activities of the Planning team and similar channels
 - other elements, including roundtable events with stakeholders and organisations.

Deliberative events (£200,000)

- 1.6 The challenges relating to spatial development that London faces are complex, evolve over time, and generally require solutions that involve some degree of trade-offs. To address these challenges in an effective and inclusive way, we need to listen to Londoners and take them with us. To do this, we need to reach across London to find a representative cross-section of voices, including those who are seldom heard in the planning system. We want to deliver this activity in a way that is open and inclusive. It is important to provide Londoners the space to explore these long-term challenges with the aim of creating a robust evidence base for a future London Plan.

- 1.7 To achieve this, we will hold a series of in-person deliberative events with Londoners. These will enable an informed, in-depth discussion (with input from experts if desired) with a large group of participants, who would be recruited to reflect the population of London. Events would be divided into themes or 'challenge areas'. Each challenge area would be explored over more than one day. This would give participants space to engage with complex issues; explore areas of consensus or contention; and hear and respond to each other's perspectives.
- 1.8 The depth of the process and its representativeness can strengthen the quality of the programme's findings and their validity with the public. By working through the challenges facing planners in London and the trade-offs they have to navigate, the GLA will be able to demonstrate – when a future policy position is decided – how Londoners' views have guided our conclusions, and how they have been informed by collective consideration of a broad range of alternatives.
- 1.9 The budget for the events covers:
- agency support to develop the content into the right format for the events, so participants can understand and meaningfully express views on the issues
 - organising and running the events
 - recruitment of a representative group of participants
 - compensating participants for their time
 - covering participant expenses such as childcare and travel.
- 1.10 Agency support is required due to a lack of sufficient/appropriate in-house expertise and capacity. This will be secured by calling off from an existing contract for market research services to allow preparations for deliberative events to start as soon as possible and for the programme's activities to be conducted within the desired timetable of the 2022-23 financial year.
- 1.11 A less costly alternative of focus groups was considered. However, these would involve much smaller and less representative groups over shorter periods of time, meaning there is limited scope to present contextual information. As such, they would not be seen as having the same validity; nor would they produce the detailed insights needed given the complexity of the issues or inform potential future policy approaches in as meaningful a way.
- 1.12 The challenge areas will be defined by an in-depth scoping exercise within the GLA Group to identify what information we already have, and which longer-term questions we can most usefully explore through the programme. They are likely to include topics such as housing and economic development, where the nature of the planning system necessitates continuing to look ahead at London's future housing and business needs, and how they might be met. The programme can allow for conversations around how to meet areas of increased ambition and urgency, such as the need to swiftly reduce carbon emissions and measures to reduce the impact of increasingly extreme weather events. For questions that consider how different places in London could evolve over time, topics including urban design and infrastructure provision are likely to be relevant. All these issues will be closely linked to how London might continue to tackle inequalities in the years to come.

Digital content, stakeholder events and programme management (£105,000)

- 1.13 The policy areas dealt with by the London Plan are complex and can seem 'remote'; yet they fundamentally relate to, and have an impact on, most people's everyday lives. Using high-quality, visually appealing digital content can help bring to life the core issues planners face will make it easier for Londoners to understand the challenges and express views on how to tackle them. This includes the participants of the deliberative events. Given that the time available for discussion during these events is limited and the breadth of issues relating to the built environment is considerable, increasing their understanding of the issues ahead of the events can allow us to make better use of the time we do have with the participants. There will also be people who want to engage with the Planning for London Programme and give their views on the future of London, and

it is important to enable their participation, in accordance with the Mayor's manifesto and London Plan commitments.

- 1.14 Presenting the issues in a more engaging way should also help make them easier to access for different groups of people, who may be put off by how planning has historically been communicated. This content could include:
- video content explaining the process and/or particular challenge areas
 - a web-based game that allows users to attempt to navigate trade-offs in a simplified, easy-to-understand and fun way (looking to examples such as the United Nations' Mission 1.5 game, which asks citizens to work out how to reduce carbon emissions)
 - long-form content, with a combination of text, visuals and moving or interactive graphics to present complex content in a visually appealing way.
- 1.15 This content will also help us to share discussions, insights and outputs from the in-person deliberative discussions on Talk London and similar channels (such as those registered to be kept informed of the activities of the Planning team, youth networks etc) to include more Londoners in the conversations. This will help raise the profile of the long-term challenges explored by the programme; expand the insights it is able to capture; and engage more people in the planning process.
- 1.16 Agency support – separate to that required for the deliberative events – is required to develop the designs of different pieces of digital content; their look and feel (in line with GLA branding); and how they will work together to convey the issues relating to the programme.
- 1.17 While the above focuses on discussions with Londoners, it is also important that the programme engages with stakeholder organisations and groups. This is particularly important if an issue needs to be explored at a more technical level, relating to the planning process itself or how the aspirations of the London Plan are delivered on the ground by boroughs, developers, community groups and others. Engaging with organisational stakeholders and umbrella groups early is therefore an essential part of providing as strong a basis as possible for a future London Plan review. This would primarily take the form of events such as roundtables, also arranged by theme.
- 1.18 While the deliberative events outlined above will enable us to include historically under-represented voices, there may also be a need for more targeted outreach with particular groups. This can help us to better understand their particular needs in greater detail, or explore an issue that is particularly relevant for that group.
- 1.19 The organising, running and communication of stakeholder events and targeted outreach will likely require some limited external support to provide sufficient programme management capacity required.

2. Objectives and expected outcomes

2.1 The objectives of the Planning for London Programme engagement are as follows:

- Providing a foundation for a future London Plan review: A core purpose of the programme is to help the development and adoption of a new or updated Plan after this Mayoral term. While the programme cannot make firm recommendations at this stage, it can lay out different options and their potential impacts.
- Broadening the diversity of perspectives captured: The GLA is committed to reviewing how to further involve local communities in the planning decisions that affect them, and more broadly seeks to create a fairer city and tackle inequalities. We know that some groups of Londoners are under-represented in the planning process. We also know that the plan-making process has a

major influence on what happens on individual sites. However, the plan-making stage has traditionally relied on those who are in a position to put their views forward. The programme offers an opportunity to actively seek out a more representative breadth of perspectives. This will provide evidence that helps ground each stage of a future London Plan review in the experiences and views of all Londoners.

- Increasing participation in planning: Planning can have an enormous impact on people's lives, and yet has too often been conducted in a way that many find difficult to engage with. While technical detail and documents are necessary in the development of plans, there are fundamental issues at play that could and should be brought to life. The programme offers an opportunity to develop more engaging ways of communicating the issues planners navigate every day. Doing so could also build a foundation for future engagement work, with an ultimate aim of driving greater and more diverse participation in planning at all levels (including who is inspired to go into the profession).

2.2 The expected outcomes of the engagement programme will be to:

- identify issues for a future London Plan review to consider
- inform a set of options for a future London Plan review to consider; and an assessment of their strengths and weaknesses, impacts on different groups, and views of Londoners
- provide evidence on how Londoners from all backgrounds view the longer-term challenges, the approaches to tackling them (including the trade-offs they may involve) and any mitigating actions to address concerns raised, to support a future London Plan review
- provide the foundations for greater consensus, through informed dialogue, as to the approaches and actions we should assess in greater depth
- provide a body of evidence that local authorities can draw on in the development of local policies.

3. Equality comments

3.1 Under Section 149 of the Equality Act 2010, as a public authority, the GLA must have 'due regard' of the Public Sector Equality Duty (PSED), that is the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity
- foster good relations between people who have a protected characteristic and those who do not.

3.2 The proposed engagement under the Planning for London Programme creates an opportunity to put a diverse group of Londoners at the heart of a future London Plan from the outset, including those with protected characteristics. As per the above, the programme will identify options for a future London Plan review to consider and assess their impacts. This will enable the Equalities Impact Assessment of a future London Plan to start at the same time as the policy development process, allowing this assessment to fully inform any policy decisions in line with the PSED.

3.3 The design of the process will also centre around making the information that conveys London's longer-term challenges easily understandable to participants and accessible for a wide group of people. This will be reflected in the brief given to whichever agency whose support we secure.

4. Other considerations

Key risks and issues

4.1 Key risks and issues are summarised in the following table:

Risk	Mitigation method	Current probability (1: low; 4: high)	Current impact (1: low; 4: high)	RAG
Complexity/scale of the scope demands more resource than the process is able to offer	Begin scoping at the earliest possible stage with a focus on identifying well-defined questions that are: in a format that participants can meaningfully engage with; and designed with how answers might inform future policy in mind. Carefully plan the scoping exercise; allocate sufficient time for it; and consider the expertise and resource needed given the scale of the programme.	3	3	Red
No agency is able to provide the support we need	Identify and approach organisations that have carried out similar work. If no suitable agency can be found, revisit route to market and adjust programme timescales to allow for this.	1	4	Amber
Agency fails to deliver to expected quality or to time	Set clear and specific parameters for delivery. Build in regular milestones to check progress.	2	3	Amber
Project delivery cost threatens to exceed allocated budget	Require agency to benchmark costs against similar deliberative events. Agree a project plan with clearly defined tasks and milestones. Hold frequent and regular meetings to scrutinise progress against project plan and costs.	2	3	Amber
Boroughs may question our approach and their degree of involvement	Invite an officer from a borough to sit on the Planning for London internal steering group to support the design of a process that treats boroughs as a full partner in shaping London's long-term growth. Communicate the process well in advance to boroughs, including a 'no surprises' approach, and programme when and how they will have the opportunity to take part in discussions, including outside the Planning for London Programme.	2	3	Amber

4.2 Associated risks of not doing the Planning for London Programme, or running a programme of smaller scope, include the following:

- Not doing the programme at all would leave a significant amount of work to do for the next London Plan review. This in turn would increase the length of time required for the review, with potential impacts on implementation of the policies of the London Plan 2021 beyond the five-year cycle set out in the NPPF. It would also create uncertainty for boroughs who are in the process of developing new local plans, and may have implications for how the government's Housing Delivery Test figures are calculated.
- Running a programme with considerably less resource spent on deliberative engagement would affect both the depth of engagement and the level of representation that can be achieved. While

a smaller programme could still offer some support towards a future London Plan review, the risks above would still apply, at least to some degree. For instance, if the process does not explore the issues with sufficient depth, its findings may not be seen as adequately addressing the trade-offs a future London Plan will have to navigate. Alternatively, if the process fails to involve participants that are representative of London's wider population, its findings may not be broadly seen as legitimate.

- Running a programme with less resource spent on digital content to support better understanding and more effective outreach could offer support for a future London Plan review. However, it would miss an opportunity to use the process to establish more accessible and appealing ways of communicating planning issues and increasing participation in planning over the longer-term. It may also leave the process open to criticism for involving too few people, even if the group involved is selected to be representative of London's population.

Links to Mayoral strategies and priorities

- 4.3 The programme offers numerous opportunities to support Mayoral strategies and priorities. There will be particular opportunities where these strategies relate to London's places, spaces and buildings, as the location and type of development in London can influence outcomes relating to housing, transport, the environment, economic development and, potentially, other aspects of Mayoral priorities.
- 4.4 The programme directly builds on the current London Plan's Good Growth objective, 'GG1 Building strong and inclusive communities', which supports 'early and inclusive engagement' with communities as well as the Mayor's commitment referred to above, at 1.2. It offers an opportunity to go considerably further in delivering against this objective. This is due to both the design of the programme – actively reaching out to a representative group of Londoners, rather than relying on Londoners to participate in a consultation – and the stage in the plan-making process, where there is more of a chance to meaningfully influence the approach taken.
- 4.5 More broadly, the Mayor is required to keep statutory strategies under review. Following the next Mayoral election in 2024, whoever is elected as Mayor may wish to consider options for refreshing existing strategies and/or developing new ones. The programme offers opportunities to support and streamline a future strategy review process by considering the interrelationships between policy issues at an early stage where there are intersections with, or links to, the London Plan.

Conflicts of interest

- 4.6 There are no conflicts of interest to note for any of those involved in drafting or clearance of the decision form.

5. Financial comments

- 5.1 Approval is being sought for expenditure upon two elements of the Planning for London Programme – £200,000 upon deliberative engagement events and £105,000 on digital content production and other engagement activity as detailed within the main body of this report.
- 5.2 The estimated spend of up to £305,000 for this proposal will be funded from the London Plan Programme budget held within the Planning & Regeneration unit and approved as part of the 2022-23 GLA budget. All appropriate budget adjustments will be made.

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. Sections 339 and 340 of the Act require the Mayor to keep the London Plan under review.

- 6.2 Section 30 of the Act gives the Mayor the power to do anything he considers will promote the economic development, social development and improvement of the environment in Greater London. In using this power, the Mayor is required under section 32 of the Act to carry out appropriate consultation. Section 34 of the Act gives the Mayor the authority to do anything which is calculated to facilitate or is conducive or incidental to the exercise of any of the statutory functions of the Authority. In taking this decision, this will ensure that any future review of the London Plan will be based on a comprehensive engagement and consultation exercise in line with the Mayor's powers detailed above. In taking the decisions requested of him, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic (race, disability, gender reassignment, age, sex, sexual orientation, religion or belief, pregnancy and maternity, and marital or civil partnership status) and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.
- 6.3 If the Mayor provides the approvals sought officers must ensure that the services required are procured by TfL Procurement and in accordance with the GLA's Contracts and Funding Code and contracts are put in place between and executed by the GLA and contractors before commencement of such services.

7. Planned delivery approach and next steps

Activity	Timeline
Appointment of agency support for deliberative events via existing contract	June 2022
Delivery start date	June 2022
Procurement for digital content support	Summer 2022
Announcement of plans for engagement	Autumn 2022
Deliberative events	Q4 2022 – Q1 2023
Online consultation	Q4 2022 – Q1 2023
Stakeholder events	Q4 2022 – Q1 2023

Appendices and supporting papers:

None.

Public access to information

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

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

Part 1 – Deferral

Is the publication of Part 1 of this approval to be deferred? Yes

If YES, for what reason: To achieve best value in procurement.

Until what date: 1 September 2022

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under FOIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – No

ORIGINATING OFFICER DECLARATION:

Drafting officer to
confirm the
following (✓)

Drafting officer:

Jack Maizels has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Philip 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 30 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

5/7/22

CHIEF OF STAFF:

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

Signature

Date

D. Bellamy

1/7/22

