16 September 2024

Lisa Fairmaner, Head of the London Plan, City Hall

Dear Lisa,

Participation in London Plan preparations

I am writing on behalf of the Just Space network to express our grave concern at what we experience as a narrowing of the scope for community participation in the next London Plan.

For some years you and Deputy Mayor Jules Pipe have promised that the GLA would produce a document akin to a ***Statement of Community Involvement***. We appreciate that the law which defines and requires an SCI does not apply to the GLA but that the proposed document would cover the same sort of ground. It continues not to appear and in the resulting vacuum we consider that the GLA is reducing the scope of participation and thus undermining the legitimacy of the London Plan.

We appreciate that over 7000 people have taken part in the ‘Planning for London’ programme and many of us have been part of that process. However that has been a one way traffic: the GLA has harvested ideas from citizens and businesses but with none of the interaction or openness to scrutiny which is an essential feature of valid consultation. Is the Mayor a control freak?

We also know that you have the open call for submissions and have ourselves submitted our Recovery Plan for London and our Manifesto 2024. Many other organisations and individuals have presumably made submissions but these are all invisible: none of us can see other submissions or even see who has submitted. This contrasts strongly with the proper consultation for Local Plans, or the EiP process, where all consultation responses are online for public access. This **one way traffic of ideas** further undermines the legitimacy of the Plan and prevents citizens discovering what developers are urging on the Mayor. So much for transparency.

Last time around, community organisations (ourselves, plus London Tenants Federation and London Forum) were members of the Steering group for the SHLAA/SHMA process, but now you tell us that the SHLAA has become ‘Land4Ldn’, an online interaction with boroughs or ‘a digital SHLAA’. Land4Ldn’s videos suggest that a simplified density matrix is alive and well in calculating housing units per site. A party will input their preferred number of units and height for a site and subject to some constraints it will immediately appear on the SHLAA. It seems a lot of decisions have already been smuggled through in this process and we are shocked not to have been included in any of the thinking behind the system. We can see no way of engaging in it or advising our member organisations. How

can the public participate in this new housing site selection by boroughs? The start date for the Land4Ldn call for sites is in fact today, September 16th.

Equally for the SHMA. We are relieved by your statement to Pat Turnbull "irrespective of what the headline need figure is, a SHMA is necessary to understand the breakdown of that housing need." But your statement needs to be fleshed out in scoping the study so that the central issues of affordability **relative to the income distribution** and **family/dwelling size** issues are adequately dealt with. London's failure to produce the dwelling stock its people need is the biggest failure of London Plans to date. The exclusion of us all from these deliberations is another outrage.

We are equally concerned about the scoping and execution of the IIA and the performance of the Public Sector Equality Duty in particular. The draft Plan can run into difficulties during examination if these processes are inadequate: your predecessors had to go back and re-work the Equality Impact reporting in two successive rounds after community groups persuaded the 2019 Panel that the original work was inadequate. It is really important that the GLA gets it right this time.

Our concerns in all this are grave and we shall share them widely in the hope that you will agree to rethink your approach. Should we have a meeting?

Yours sincerely, Michael Edwards for Just Space

Cc: Assembly Planning, APPG London, London Forum, LTF, London Housing Panel