

TOWARDS A NEW LONDON PLAN: EQUITY, FAIRNESS, JUSTICE (5.19!)



From JS Manifesto 2024

CO-PRODUCTION AS A CORE VALUE

- The Mayor must require their staff and councils to make meaningful co-production a core value in planning practice and policy-making
- Developers must adopt meaningful co-production and show its effect on substantive aspects of a design
- Require community-led audits, to measure the things that people value and to assess local needs in and around a site or area identified for redevelopment
- Require a community-led audit for all development of public sector land and as part of Environmental Impact Statements
- Require that new plans are co-produced with local communities and citizen assemblies, with greater transparency and accountability

DECISION-MAKING PROCESSES MORE ROBUST AND LESS OPTIONAL

- Require local planning authorities' Statements of Community Involvement to be enforced
- Developers must agree to a schedule of early engagement
- Developers should provide Social Value Statements based on early engagement
- Ensure Equalities Impacts Assessments are robust, meeting the public sector equality duty and ERHC technical guidance
- Ensure existing legal duties of consultation are acknowledged in planning policy
- Require the creation of community review panels alongside design review panels, with historically invisible communities represented

THE MAYOR SHOULD PROVIDE SUPPORT, FUNDING AND TRAINING to enable community voices to be heard in local planning and co-production, prioritising small organisations.

SUPPORT ALL PROGRAMMES FOR TACKLING DIGITAL EXCLUSION including training and skills, access to devices, provision of free data and London-wide free wifi

- Continue the work already underway through Connected London, including the Streetscape programme and Get Online London
- Commit to free wifi coverage on all public transport
- Work with domestic providers to widen access to affordable phone and broadband
- Free internet in all public buildings
- Good quality hybrid access (i.e. in person and online) at all public meetings

- Design online public services to a high quality, to ensure they can be used successfully by all those who need them

RACIAL INEQUALITIES, PATTERNS OF DEPRIVATION, AND VISIBILITY

- The Mayor will address the systemic invisibility of certain groups and push for their visibility, which can translate into public life and policy making.
- The Mayor build on existing work to tackle and eliminate structural racism in public life in London, including in the planning process
- Provide resources and support for historically disadvantaged communities and the organisations that support these groups
- Local Authorities should investigate racial inequalities and local patterns of deprivation to understand the root causes of issues. In national decision-making and policy-making, Black and minoritised communities must be sought and consulted when collecting equalities data.

REMOVING REVOLVING DOORS

- Elected Councillors and planning officers should not move directly into working for planning consultants, PR companies and developers. They are often hired by developers to smooth applications through the council's processes

The current LP says very little specifically about participation or fairness of equality, apart from Good Growth 1 (GG1) and Policy D5. These policies are too vague and unenforceable, although **GG1** is the opening policy in the LP and is a good overarching policy as a principle from which other policies flow, which is how it is best used. We need policies which are measurable, enforceable, meaningful.

No mention of inclusivity/fairness in the 78-page document! This is completely deficient - and not being measurable or enforceable, or meaningful, resulting in insubstantial outcomes. Strong concerns that the "**build at all costs**" approach sacrifices equality considerations. The general thrust from the govt and GLA is to reduce the burden of policies on housebuilders, by allowing non-compliance with policy, including policies protecting rights and ensuring fairness. Implicit in pushing to improve building is that we are actually minimizing the value of those other things.

There is no affordable housing target, just an overall target of potentially market homes. For housing to be a social good it needs to meet the needs of the local community, not of overseas investors. Homeless families are in urgent need!

The **Build-to-Rent dominance** is staggering: 66% of new developments (Q4 2024) - see Fig 2.5 in TLP. Build to Rent should be discouraged so long as rents are racked.

Some things planning can't do but which are necessary e.g. **rent regulation and caps**. Sadiq Khan needs to again champion the Mayor's Blueprint for Renting (2019) and ask central govt to enable Mayoral powers essential to bring down rents and house prices.

Is inclusion an illusion? **Community engagement structures** are being dismantled or downgraded, and things are becoming far more top-down driven, which is very disappointing after making lots of strides forward over previous Mayoral terms in terms of quality of engagement. A frequent claim is that they are developing "new ways of working", but if they are then they are exclusionary. Access is by invitation only.

Planning is deliberately made invisible to most people, until it comes up and hits them with a terrible development or unmet demands, and even then it is impenetrable at best. Obviously it's complicated, but the process seems to overcomplicate rather than find new ways of working which are genuinely transparent.

Public Sector Equality Duty (PSED): this is underused, but should be central to planning. A way of calling out direct and indirect discrimination.

Socioeconomic status (class) should be treated as a protected characteristic (as in Scotland/Wales) and a legally binding commitment. Some councils have informally adopted it.

Estate regeneration programmes are negatively impacting on particular ethnic communities, lower socio-economic classes, those with disabilities, yet this isn't even analysed - in fact the information isn't even collected on such a granular basis - although there are ways of analysing census data on a more granular level and intersectionally.

Census data limitations: Underrepresents private renters, low-income groups, and non-English speakers. There are alternative/ better data sources (e.g., actuarial/met police data). What is the Mayor doing about this? There is EHRC guidance on how to do equalities impact assessments, which says you need to not just go on generics.

There is as yet no scoping of how the GLA are going to develop an **Integrated Impact Assessment**, which includes equalities impact assessments. We must be consulted on the scope. But we want them to do an early stage impact assessment on how they're engaging right now, not just what they're proposing in the LP.

Proactive community-led audits: Apart from those rare sites with detailed policy allocations, the current system is reactive, where there's no question at any point of what's best for a site and the community. So when a developer is looking at a site, they have a relatively free rein to make proposals, and then the community responds in a limited scope. There's nothing about what's best for the site or the community. The JS policy is for community-led audits to measure the things that people value and to assess local needs require. There should be community led audits for all public sector land. Councils should be required to commission a community-led audit for plan-making, developers likewise for application development. There's no reason for this to be more costly than other commissioning studies for plan-making. This flows from LP policies GG1 and D5, which talk of inclusive and resilient communities. The problem is that the LP doesn't require engagement with individuals affected or taking into account London's diverse population.

Digital exclusion: Overreliance on digital consultation excludes vulnerable groups. We're still suffering top down decisions without anyone being consulted. The major focus around health inequalities in London over the next period is going to be around digital access to health services, because that's what the government wants! All the community work we've been very heavily involved with in London, developing improved community engagement in health inequalities, it looks like work which will be sidelined, ignored. This is classic exclusionary tactics! Many local London boroughs have a digital first policy, which really means digital only.

Legal Advice is being battered. Justice requires funding the other side: if it's just one sided, and there's just one decision maker who has total control, then the capacity for justice is negligible.

The Recovery Plan has a policy about the Mayor of London exercise strategic role to ensure public accessible Wi-fi connection has that has any of that rolled out on transport: buses, underground etc. This is currently being rolled out, including local authorities e.g. one of the boroughs is providing access zones around bus stops, funded by advertising at the bus stop.