



**Sakina Sheikh AM**

**Chair of the Planning and Regeneration Committee**

Sadiq Khan  
Mayor of London  
(Sent by email)

3 May 2023

Dear Sadiq,

I am writing to you in my position as Chair of the London Assembly Planning and Regeneration Committee regarding the future of the London Plan and the Planning for London Programme.

The Committee understands that the GLA has stated there is no intention to review the London Plan during the current Mayoral term. We welcome, however, the GLA's Planning for London Programme<sup>1</sup> that aims to provide a structure to start gathering evidence, capturing views of diverse stakeholders, and identifying issues and options that a future London Plan review could consider. I have set out below in this letter themes identified in collaboration with community groups that should be considered in this evidence gathering for the future review of the London Plan.

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<sup>1</sup> The stated objectives of the Programme are to provide a foundation for a future London Plan review, broaden the diversity of perspectives captured, increase participation in planning.

The 2021 London Plan was finalised before the pandemic, and the Committee is acutely aware of how COVID-19 uncovered and exacerbated many of the inequalities in our society. As we continue to recover from the COVID-19 pandemic, it is critical to integrate our learnings and begin reviewing the London Plan sooner.

How our city is designed and housing conditions were at the core of people's pandemic experience; sufficient space, access to local green space, and local amenities are essential for positive mental health. Learning these lessons to inform how we continue to build world class homes for Londoners is vital, and we welcome the work by the London Recovery Board in this aspiration, but believe more needs to be done to ensure that these lessons are captured in the Planning for London Programme and the future London Plan.

It is partly for the above reasons that the London Assembly Planning and Regeneration Committee began this municipal year by holding an investigation in September and October 2022 on the future of planning in London. On 7 September 2022, the Committee held a meeting which brought together representatives from community groups to consider the impact of the pandemic on different communities of Londoners, and how approaches to planning can address inequalities and reflect the needs of diverse Londoners. Guests were asked to reflect on how approaches to planning in London can build on the strength of civil society, and enable all Londoners to play an active role in planning. This analysis and the Committee's recommendation from this investigation are laid out below.

#### Themes arising from the Committee investigation on the future of planning in London

The Committee worked with Just Space<sup>2</sup> to develop a diverse range of guests and themes for discussion. As part of the Committee's investigation, the Committee also received a briefing from the GLA Planning for London Programme team. During the Committee meeting on 7 September 2022, the Committee heard from:

- Luke Bruce, Programme Director, **London Recovery Board, GLA**
- Robin Brown, Representative, **Just Space**
- Portia Msimang, Project Coordinator, **Renters' Rights London**
- Florence Nazziwa, Founding Member, **Equal Care London**
- Natalia Perez, Co-Director, **Latin Elephant**
- Saif Osmani, Founding Member, **Bengali East End Heritage Society**
- Yasmin Moalin, Youth Engagement Lead, **Anti-Tribalism Movement**
- Francesca Humi, Advocacy and Campaigns Officer, **Kanlungan Filipino Consortium**
- Christine Goodall, Network Coordinator, **HEAR Equality and Human Rights Network**
- Pat Turnbull, Regional Representative, **London Tenants Federation**

The Committee also received written evidence from:

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<sup>2</sup> Just Space is an informal alliance of around 80 community groups, campaigns and concerned independent organisations which was formed to act as a voice for Londoners at grass-roots level during the formulation of London's major planning strategy, particularly the London Plan.

- Jane Wilmot OBE, Chair, **Hammersmith and Fulham Disability Forum Planning Group (DFPG)**

During the investigation, the Committee heard personal accounts of the impact of development, buildings, places and planning on various communities; the different ways people from different groups experience spaces; and the level of trust Londoners have that the planning system will protect and deliver what they need.

The London Plan 2021 sets out the importance of early and inclusive engagement within the planning process. This Committee investigation, as well as previous Committee work,<sup>3,4</sup> reveals that there is still a gap between the ambition set out in the London Plan, and how some Londoners feel about opportunities to be involved in decisions about development and design in their areas.

The themes that arose in the investigation included:

### **1) Value of community spaces and businesses serving local communities**

During the Committee meeting, guests spoke about the need to invest in and support infrastructure such as community hubs, markets, and small traders and business owners. These provide a necessary support network to communities, especially in times of crisis, and for Londoners who may not have links to formal institutions, groups or support structures. A common theme during the discussion was that community groups asserted that the economic, social and financial value of these community spaces and businesses is not given enough weighting in planning processes and regeneration projects. Saif Osmani, Bengali East End Heritage Society, reflected on his involvement in the ‘Save Brick Lane’ campaign against the planning application to develop the Truman Brewery site in Brick Lane, and observed that ‘the council officers do not value what we value’.<sup>5</sup> In relation to another campaign at Queen’s Market in Upton Park, Saif Osmani also observed:

“Next year [2023] in Upton Park we mark 20 years of ‘Friends of Queen’s Market’ where we have had to fight continuously for 20 years to protect the market. Every month we meet with 15 people and we have to fight for our main food source for our community.”

### **2) Impact of regeneration on local communities**

Other guests commented on the impact of regeneration on local communities, and the need for this impact to be recognised and addressed throughout the planning and development process. Natalia Perez reflected on the role Latin Elephant has played in supporting traders during the regeneration of Elephant and Castle, and observed that, of those traders who were operating businesses in the area before the regeneration project started, ‘half of the traders have not been

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<sup>3</sup> Planning and Regeneration Committee, [Open Planning? Community engagement and transparency when the Mayor calls in planning applications](#), March 2022

<sup>4</sup> Planning and Regeneration Committee, [Opportunity Areas and Housing Zones](#), March 2022

<sup>5</sup> Transcripts of the Planning and Regeneration Committee from 7 September 2022 can be found on the London Assembly website: [Agenda for Planning and Regeneration Committee on Wednesday 7 September 2022, 2.00 pm | LGOV \(london.gov.uk\)](#)

relocated'. Natalia Perez also questioned the effectiveness of the Equalities Impact Assessment (EqIAs) process and the effectiveness of planning conditions:

“Sometimes the EqIAs can be led by one of the parties who may have a conflict of interest. Is there a possibility of having an EqIAs that is neutral; that is independent? Also, how representative is it? ... [In addition] how are huge planning applications that have been agreed monitored? Today I give you an example of what has been happening at Elephant and Castle. We have some planning conditions and we have some compensation for the traders, but two years down the line we are still not seeing some of the changes that were promised, so is that monitoring happening?”

### **3) Lack of inclusivity of planning processes**

Another common experience raised by guests at the meeting was of planning processes not being inclusive, meaning that many people are shut out of participation in decisions about development and regeneration. Guests observed that digital divides, technical planning language, information imbalances, and language barriers all contributed to public disenfranchisement. Guests agreed that working with grassroots community groups is essential to making participation in planning and regeneration accessible to different communities. Natalia Perez, Latin Elephant stated:

“We work with a community of traders and business owners in the Elephant and Castle area... We have accommodated to their availability, we have made it local, we have used community interpreters, we have worked in partnership, as I mentioned before, to demystify the planning process with a workshop in Spanish, for example, which was very, very useful and got people engaged. Yes, it is making those adjustments to make it accessible to the communities that we represent.”

### **4) Inclusive design**

During the investigation, the Committee received evidence about the barriers which Disabled Londoners can face when using housing, public buildings and public open space. The Committee heard that inclusive design must be embedded throughout the next London Plan, and in the planning process by local authorities, in order to create inclusive communities. Jane Wilmot, Chair of the Hammersmith and Fulham Disability Forum Planning Group (DFPG), wrote:

“For many Disabled people in terms of the built environment, the places and spaces they use the reality is that most buildings, homes and places even new ones do not enable Disabled people to enjoy the same opportunities in their local community that non disabled people take for granted... Inclusive design needs to be a golden thread throughout the planning process from inception, planning application and approval, through specification to completion.”<sup>6</sup>

### **5) Engagement fatigue**

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<sup>6</sup> Include link to written evidence when it is online

Guests spoke about engagement fatigue, partly resulting from the perceived lack of return on their previous involvement. Christine Goodall, HEAR Equality and Human Rights Network, stated:

“People get very, very weary of being asked over and over again for their experience... financially recompensing people for taking part in things... is a really good idea, especially if you are looking at small community groups with very little money and you keep asking them over and over again to contribute their expertise for nothing.  
“When people contribute, there being a proper mechanism for them to hear back what has happened about what they have said.”

## **6) Limited ability for private renters to participate in planning**

The discussion at the meeting covered how the short-term nature of tenancies in the private rented sector acts as a barrier to Londoners engaging in the planning process. Portia Msimang, Renters' Rights London, noted:

“Nearly one third of Londoners live in the private rented sector but they are not in any one place for long enough to really feel like part of that community anyway and are the least likely - I believe - to be engaged with any of these processes.  
“But even those of us who do feel quite attached to place, we very often feel that we are presented with a fait accompli, yes or no, to this. The way to engage people is to involve them sooner really. We do not feel as if we have much say over anything and, even if we say, ‘We do not want this, we do not like this,’ it still happens very often. I do not think there is any genuine sense of coproduction.”

## **7) Linkages between planning and housing, working conditions, and immigration status**

The Committee heard from community groups about how some Londoners suffer from a combination of insecure and vulnerable working conditions, unsettled immigration status and inadequate housing. The impact of this was particularly severe during the pandemic. Francesca Humi, Kanlungan Filipino Consortium, explained:

“There were so many Filipino nurses who could not afford to live near the hospitals where they were working or could not afford rent, so they were resorting to bed sharing. If you are living during a pandemic and your whole household are other healthcare and social care workers and you are sharing beds because you cannot afford rent in London, that is necessarily also going to accelerate the impact. The reason why people cannot afford rent is obviously because wages are very low but it is also because migrants have to pay an NHS surcharge in order to access healthcare. They face huge fees when it comes to renewing their visa, instructing a solicitor, and also have no recourse to public funds, meaning that they cannot get assistance with housing, benefits, childcare. Their children are not eligible for nursery or for free school meals, for example. Therefore, the pandemic had a knock-on effect and it was being exacerbated by people's immigration status.”

**Based on the themes as outlined above, the Committee has three main recommendations about the GLA's approach to the future London Plan and the Planning for London Programme.**

1. The GLA should explain how its stakeholder engagement for the Planning for London Programme will be truly representative of Londoners, including groups which are historically not well engaged by the planning system. The Committee heard that the GLA and local authorities need to invest in different communities to enable a diverse range of Londoners to be able to play an active role in planning. We understand that the Planning for London Programme has recently run a series of invitation-only events bringing together 'representative groups of Londoners', and the Committee would welcome an update from the GLA planning team on the findings from these meetings.
2. The GLA should establish a co-production group of a range of Disabled Londoners and Disabled people's organisations ahead of the review of the London Plan, when it takes place in the next Mayoral term.
3. The Planning for London Programme should carry out the groundwork for the following to be included in the next London Plan:
  - a. A Mayoral Statement of Community Involvement, which will set out standards for local authorities and developers to follow.
  - b. A requirement that planning applications incorporate co-production with communities at an early stage.
  - c. Embedding accessible and inclusive design throughout the London Plan.
  - d. Setting out best practice for local authorities to address barriers to participation in the planning system. These barriers include digital divides, technical planning language, information imbalances, language barriers, and engagement fatigue.

The Committee would welcome a response to this letter by 3 July 2023. Please address your response to Sarah-Jane Gay, Senior Policy Adviser, at [Sarah-Jane.Gay@london.gov.uk](mailto:Sarah-Jane.Gay@london.gov.uk).

Yours sincerely,



**Sakina Sheikh AM**

**Chair of the Planning and Regeneration Committee**