

GREATER LONDON AUTHORITY

REQUEST FOR DIRECTOR DECISION – DD2259

Title: London Plan Consultation Database - further development work

Executive Summary:

This DD asks for approval to make enhancements to the London Plan Consultation Database (LPCD). Expenditure for the development of the LPCD, a system to record and analyse responses to the consultation draft London Plan, was approved under DD2152 for up to £90,000. This additional work would be carried out by CTI Digital.

Decision:

That the Executive Director of Development, Enterprise & Environment approves:

Expenditure of up to £50,000 on external services to improve the public search of comments submitted to the database – taking total expenditure on the database to a possible maximum of £140,000

AUTHORISING DIRECTOR

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Lucy Owen

JULIANA MCHUGHAN

Position: Executive Director of Development,
Enterprise & Environment

Signature:

[Handwritten Signature]

Date:

30-8-18

PART I - NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1 DD2152 approved the development of an online consultation system for the Draft New London Plan, with a budget of up to £90,000. CTI Digital, a web-development company with extensive experience of working on the Mayor of London's website, were appointed to carry out the work in accordance with TfL's procurement procedures.
- 1.2 The system, which came to be known as the London Plan Consultation Database (LPCD), was initially developed in two main phases. The first, which allowed the content of the Draft London Plan to be browsed and comments submitted online, was completed in time for the consultation period to begin on 2nd December 2017. The second phase, which provided the London Plan team with an effective system to capture and analyse the responses and a means for the public to view and search for the comments received, was implemented in further development 'sprints', the last of these was completed in April 2018.
- 1.3 The initial value of the contract was based on estimates provided following an initial scoping exercise with approved suppliers, and reflected the cost of developing a system that would enable us to carry out the consultation for the London Plan within the required timescale. When the final specification was costed it came in at the maximum of the approved budget.
- 1.4 Following user testing of the public search functionality as delivered and feedback from stakeholders, a series of enhancements have been identified that would substantially improve the user experience. It is the view of officers in the Planning Unit that these improvements should be delivered before the start of the Examination in Public (EiP) for the London Plan so stakeholders and interested members of the public can get maximum benefit from the system during the EiP process.
- 1.5 As a result of the successful use of the system for the submission, analysis and publication of the comments, interest has been expressed in re-using it for further consultation exercises. The system has already been cloned for use for the online publication of the Mayor's Environment Strategy, showing the potential benefits to the wider GLA. The proposed changes would not just be of benefit to the London Plan, but would improve the user experience for any future users.
- 1.6 After the development phase covered by this Decision there will be a period of reflection. A decision will then be made whether to further develop the LPCD into a more generic consultation system for use across the GLA. Should the decision be made to re-use the system, any further development work, and any potential support contract, will be covered by a new Decision.
- 1.7 CTI Digital, the developers of the original system, will carry out this work. This is because their understanding of the structure of the database and the objectives of the project put them in a unique position to deliver the proposed changes without the need for a new supplier to factor in additional time to familiarise themselves with the system, which would drive up the cost. The work will be commissioned using call-off agreement ICT 12245.

2. Objectives and expected outcomes

2.1 To carry out the enhancements set out in Appendix 1. Broadly these can be summarised as:

- Improve the design of the pages to make it easier to access the search
- Simplify the comments search dashboard
- Improve the visibility of comments for an entire chapter or policy
- Display the number of comments so users can understand the level of response to a chapter or policy
- Generate and provide access to PDFs of all comments by author, chapter or policy
- Improve the display of comments submitted as part of a 'set response group', ensuring that all respondents can be viewed
- Clear the database of non-commenting users in line with General Data Protection Regulations

3. Equality comments

3.1 Under s149 of the Equality Act 2010 (the Equality Act), as a public authority the Mayor/GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

3.2 The further development of the public interface is intended to improve access to the responses submitted as part of the formal consultation to the Draft New London Plan, improving transparency and enabling as many people as possible to have access to the comments.

3.3 The enhancements will ensure that comments can be downloaded in PDF, as well as being viewed on screen, again with the aim of providing access to as wide a range of users as possible.

3.4 The draft London Plan is itself subject to an Integrated Impact Assessment (IIA) which includes an Equalities Impact Assessment (EqIA).

4. Other considerations

Key risks and issues

4.1 Providing the public search without making these improvements could have a negative reputational impact as users may focus on the limitations of the system rather than the benefits provided. The current system does not allow users who have submitted comments using a pro-forma supplied by a campaign group to easily view their comment even though it is stored on the system. Again, this may generate negative user feedback.

4.2 The enhancements will be developed in line with the Technology Group protocols for risk management. As any changes to a live system can be rolled-back should any issues emerge, the risk of any negative impact from this project is extremely low.

Links to Mayoral strategies and priorities

4.3 The proposed improvements will also benefit any future users of the system, which could potentially be used to help with the consultation for any Mayoral Strategy or document.

Impact assessments and consultations

- 4.4 The consultation database has been set up in line with the principles of GDPR. The fact that all representations will be made public was a condition of submitting a comment. Any personal data supplied with the comment was provided for the specific purpose of allowing the Planning Inspectors to organise the Examination in Public for the London Plan. No personal data, besides the name of the organisation or individual who submitted the comment and the comment itself will be presented on the public search.
- 4.5 The London Plan is subject to an IIA, including EqIA. The proposed system is for capturing, recording and providing public access to consultation responses for the draft London Plan.

5. Financial comments

- 5.1 Approval is being sought for expenditure of up to £50,000 for IT development consultant CTI Digital to make improvements to the public search of the comments submitted as part of the consultation on the Draft New London Plan. The costs will be funded from the 2018-19 London Plan Programme budget. This work will take the total spend on London Plan consultation response system to £140,000 (DD2152 approved £90,000 spend).

6. Legal comments

- 6.1 Section 334 of the Act requires the Mayor to prepare and publish a Spatial Development Strategy (known as the London Plan). Section 339 of the Act requires the Mayor to keep the London Plan under review, especially matters which may be expected to affect the development of Greater London or the planning of its development.
- 6.2 The Authority also has a subsidiary power pursuant to Section 34 of the Act. This 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 this case, the decision to procure specialist technical services to undertake this work to expand this platform may reasonably be regarded as facilitating, being conducive or incidental to, the exercise of the Mayor's section 334 and 339 powers detailed above.
- 6.3 In taking the decisions requested, the Director 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, age, sexual orientation, religion or belief, pregnancy and maternity and gender reassignment) and persons who do not share it (section 149 of the Equality Act 2010). To this end, the director should have particular regard to section [3] (above) of this report.
- 6.4 CTI Digital are one of the development resources with which the GLA has a commercial agreement through the Government g-cloud framework for assurance and value for money purposes. Their services will be procured using call-off contract ICT 12445, which has been set up with the Transport for London Commercial team in accordance with the GLA's Contracts and Funding Code. The appropriate contract documentation is in place to begin this project.

7. Planned delivery approach and next steps

Activity	Timeline
Procurement of contract [for externally delivered projects]	August 2018
Delivery Start Date [for project proposals]	August 2018
Final evaluation start and finish (self/external) [delete as applicable]:	September 2018
Delivery End Date	September 2018

Appendices and supporting papers:

Annex 1: Request for Proposal – LPCD post-delivery changes is appended to this form.

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FOI Act) 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 approval 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:

The publication of the approval form should be delayed until the cost of the work is agreed with CTI Digital to ensure that a fair price is agreed for the work that is not influenced by the value of this decision.

Until what date: 15 September 2018 (or until contract is agreed if earlier)

Part 2 Confidentiality: Only the facts or advice considered to be exempt from disclosure under the FOI Act should be 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:

Jonathan Brooker has drafted this report in accordance with GLA procedures and confirms that:

✓

Assistant Director/Head of Service:

Juliemma McLoughlin has reviewed the documentation and is satisfied for it to be referred to the Sponsoring Director for approval.

✓

Financial and Legal advice:

The Finance and Legal teams have commented on this proposal, and this decision reflects their comments.

✓

Corporate Investment Board:

The Corporate Investment Board reviewed this proposal on 13 August 2017.

EXECUTIVE DIRECTOR, RESOURCES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

Signature M. D. Allen

Date 20.8.18