

Shaping the Future London Plan Planning and Regeneration Committee





LONDONASSEMBLY

Planning and Regeneration Committee



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The Planning and Regeneration Committee examines and reports on matters relating to spatial development, planning and regeneration in London and leads scrutiny of the Mayor's Spatial Development Strategy (the London Plan). The Committee also has lead responsibility for scrutiny of the Old Oak and Park Royal Development Corporation, and the London Legacy Development Corporation.

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Foreword



Sakina Sheikh AM Chair of the Planning and Regeneration Committee

A truly accessible London for all is possible. As the Greater London Authority (GLA) prepares to review the 2021 London Plan, the Planning and Regeneration Committee has undertaken a series of investigations aimed at thinking about the future of London's design.

We've taken a step back to ask broader questions about the lessons we can learn from historical housing estates as well as whether gendered-informed planning can improve safety for women and girls in the future.

Our investigations also delved into how planning can both help and hinder the ways in which people travel around the capital and access services, looking at what the 15-minute city concept means for London. We also looked at the relationship between the layout of the public realm and crime, and how we can ensure Disabled Londoners' input on inclusive design is prioritised.

The way we design our neighbourhoods plays a crucial role in shaping the health and wellbeing of London's communities. This was particularly highlighted during the COVID-19 pandemic with lockdown having a profound impact on people's understanding of the importance of planning and good design. It became clear this agenda shapes every layer of our daily life from the size of our living rooms to our access to green space and sunlight.

The housing crisis has exposed the inadequacies of our centralised planning system. Recent planning reforms in the Levelling Up and Regeneration Bill retain and further this centralised approach. For London to be truly accessible the design of our city must be a collective endeavour. The GLA plays a crucial role in convening residents, architects, experts, planners and other key stakeholders to deliver a more inclusive approach to designing our built environment in London.

We are clear that protecting the sovereignty of the London Plan and local plans is a crucial way of achieving the most inclusive design principles that reflect Londoner's needs.

The collection of letters in this report detail the findings from our investigations and our recommendations to the Mayor for the next iteration of the London Plan. We hope our

contribution can broaden the framing through which we access good design within our planning system as the review of the 2021 London Plan gets underway.

I want to thank all those who have contributed to this investigation, in particular to the Planning and Regeneration Committee members for their effective cross-party collaboration and to the Secretariat for all their support.

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Executive summary

The way we design our buildings plays a crucial role in shaping the health and wellbeing of our communities. This year, the London Assembly Planning and Regeneration Committee ran a number of investigations into how planning can both help and hinder the way in which we live and travel around our city. The Committee conducted investigations into:

- The architectural design of social housing in London
- The concept of the "15-minute city" and what this would look like in London
- The extent to which planning can help "design out" crime in our communities
- The impact of planning decisions on accessibility for Disabled people
- The extent to which women and girls are impacted by the design of the built environment.

This report is a compilation of letters and outputs that encapsulate our learnings from these investigations and inform our recommendations to the Mayor for the next iteration of the London Plan. Below is a summary.

The "Planning for London" programme

The National Planning Policy Framework (NPPF) sets out Government guidance on planning policies in England. The NPPF requires local plans and spatial development strategies to be reviewed no later than five years from the adoption date of a plan.¹ As the current London Plan was adopted in March 2021, this means that it should be reviewed no later than March 2026.

The Greater London Authority (GLA) has stated that the current plan provides an "up-todate policy framework for London" and as a result, will not be reviewed during this Mayoral term.² Nonetheless, the GLA has acknowledged that it takes "many years to review or develop a new London Plan"³ and therefore in December 2021, the GLA began the process of engaging with Londoners and other stakeholders through a 'Planning for London Programme.' The aim of the programme is to gather evidence, capture the views of stakeholders and identify issues that a future London Plan review could consider. The Programme will not make "definitive recommendations" on what the future London Plan should contain but its findings "will help inform the development of a new or updated Plan after the end of this Mayoral term."⁴

The Planning and Regeneration Committee's work programme this year was designed to actively contribute and feed into the Planning for London Programme.

- ³ GLA, <u>Planning For London Programme consultation</u>
- ⁴ GLA, <u>MD2992 Planning for London Programme engagement ahead of a future London Plan</u>, December 2022

¹ Department for Communities & Local Government, <u>Factsheet: Local Plans</u>

² GLA, <u>MD2992 Planning for London Programme – engagement ahead of a future London Plan</u>, December 2022

Key Findings

During the course of our investigations, the Committee was encouraged to hear of work being carried out by the GLA and local authorities across London. From Mayoral initiatives to ensure that women and girls feel safer on our streets to local authorities working with their communities to embed inclusive design practices into the heart of the planning system, it is evident that progress has been made. However, the Committee's work shows that challenges still persist and more can be achieved to make London an inclusive space for all.

The Committee remains committed to advocating for further measures to address the needs of our diverse communities and promote a city that prioritises the safety and wellbeing of all Londoners. To do this, we believe the Planning for London programme should consider the following findings, which fall broadly into three categories:

- Data matters for the London Plan.
- The London Plan should be **designing for everybody**.
- A collaborative approach is essential for delivering the London Plan.

Data matters for the London Plan

- Better data should be collected on the housing needs of Disabled Londoners, with stronger targets for accessible homes.
- More gender disaggregated data is needed to inform future London Plan policies on designing gender-diverse spaces.

The London Plan should be designing for everybody

- The London Plan must be up-to-date with good practice on inclusive design, which moves quickly.
- The London Plan should offer more detailed guidance to ensure boroughs across London apply inclusive design policies consistently.
- There can be tensions between designing spaces that are safer and places that are inclusive. The London Plan should be more explicit on how local authorities can strike the right balance between safety and inclusion.
- More accountability throughout the planning process is needed if applications are being amended to the detriment of inclusive design, after they have been approved.

A collaborative approach is essential for delivering the London Plan

- More engagement is needed between designers and users of public spaces, as well as those who are less likely to use public spaces to understand how they can be included. To this end, it is important to capture, where possible, disaggregated data on consultation responses.

- There is no one-size-fits-all when it comes to designing our public spaces. Planners should therefore be considerate of the demographics, cultural heritage and needs of their local communities.
- Key planning stakeholders, such as architects, the police, local authorities, and landowners often work in silos – to ensure a holistic approach to design, the GLA should be using its convening powers to bring together these stakeholders to sensecheck future London Plan policies.

Is the past the future?

Understanding how our city has been designed can help shape the designs of the future. This is why the Committee examined the architectural design of social housing and the extent to which the design and architecture of these homes has changed since the turn of the twentieth century.⁵ Our investigation considered how decisions over the design of social housing are made by developers and councils and the extent to which costs, aesthetics, and sustainability impact design standards.

To further our understanding of the design of social homes and their architectural evolution, the Committee visited two Peabody estates, one built in 1871 (Blackfriars Estate) and the other built in 1936 (St John's Hill in Clapham). During our visit we heard about the influence that various political, economic and social conditions had, and continue to have, on the design and architecture of these estates. We also heard about how historically creating communal spaces in social housing estates through good design was paramount, as demonstrated in the first site visit. In the second visit however, we had conversations about how the regeneration of an estate can impact the cohesiveness of a community. We heard that even though families are given the right of return to a home, the process of regeneration sees some family settle elsewhere.

As part of the investigation, we also held an evidence gathering session on 12 September 2023 where we heard from a range of experts on the historical considerations and outcomes of social housing design, and what the priorities for future developments should be. Guests at the meeting included:

- John Boughton, Historian and author of Municipal Dreams: The Rise and Fall of Council Housing
- Charleen Henry, Senior Urban Designer, GLA
- Christine Wagg, Historian, Peabody Trust
- Alice Brownfield, Architect and Director, Peter Barber Architects
- Kate Macintosh MBE, Architect and designer of the Dawson's Heights social housing estate in Southwark.⁶

A major theme that emerged during this investigation was the importance of community, and the role of design in helping to bring residents, and those from the surrounding area,

⁵ Planning and Regeneration Committee meeting, 12 September 2023, minutes

⁶ Planning and Regeneration Committee meeting, 12 September 2023, minutes

closer together. We heard from Kate Macintosh MBE, who provided examples of efforts to create inclusive community spaces within her own designs, including the innovative Dawson's Heights estate.⁷ This included conveniently located common room space in a sheltered housing scheme and a children's playground on an estate impacted by high levels of unemployment. She also cited the historical policy of Lambeth Council to ensure that all housing estates incorporated some communal facility for public use, as an example of an "enlightened" approach which is no longer used.⁸

Both John Boughton and Christine Wagg added historical perspectives to the development of social housing. John Boughton told the Committee that the delivery of post-war social housing was influenced by emerging ideas of mixed community held by Nye Bevan, former Minister for Health from 1945 to 1951. The Committee heard that Bevan believed social housing should serve general needs rather than being reserved for the working-classes. This encouraged designs that delivered housing aimed at a range of people with different needs. Innovative housing designs, including Dawson's Heights, were cited as radical for including different size-housing next to each other, but which helped to support a "mixed tapestry" where people with different experiences were brought together and able to provide support to one another.

The Dawson's Heights Estate

The Dawson's Heights Estate in East Dulwich, completed in 1972, was designed by architect Kate Macintosh MBE. It was a mixed development that included a range of accommodation to suit families and individuals in a range of life circumstances. Macintosh stated:

"if large blocks were to be accepted and loved, as a new way of living, they must try to replicate the best characteristics of the terraced street; that families of different sizes and age groups should intermingle, as their needs and strengths would be diverse and complementary."

The estate's design comprised two dramatic ziggurat-style blocks facing each other across a green expanse and provided a total of 296 homes. Every flat had a private balcony, designed to serve as a fire escape.¹⁰

Guests at our meeting also discussed the impact that design can have on criminality and antisocial behaviour. Charleen Henry, Senior Urban Designer at the GLA told us how on one social housing estate, the lack of legible routes through the estate and entrances that were not clearly visible caused "a host of problems" in terms of crime and antisocial behaviour.

⁷ Planning and Regeneration Committee meeting, 12 September 2023, <u>minutes</u>

⁸ Planning and Regeneration Committee meeting, 12 September 2023, <u>minutes</u>

⁹ John Boughton, *Municipal Dreams: The Rise and Fall of Council Housing*, 2017

¹⁰ John Boughton, *Municipal Dreams: The Rise and Fall of Council Housing*, 2017

Other guests such as John Boughton, disputed the link between design and crime, stating that design does not "inexorably shapes people's experience." He asserted:

"those estates that were failing were frequently, normally, very successful at other times. Therefore what changes? The architecture does not change, the planning does not change, they are the same estates. What has made the difference? It is the conditions in which those people are living in terms of the social and economic circumstances of that population in that community."¹¹



The Committee with panellists at the architectural design of social housing in London meeting on 12 September 2023. From L to R: Assembly Member Elly Baker, Christine Wagg, John Boughton, Assembly Member Sakina Sheikh (Chair), Kate Macintosh CBE, Charlene Henry, Alice Brownfield and Assembly Member Siân Berry.

During our investigation, guests highlighted the need to not only recognise the importance of London's social housing designs, but also to celebrate them. Projects such as Dawson's Heights and the Alexandra Road Estate in the borough of Camden, showcase how innovative design principles can serve as the foundation for inclusive, vibrant communities. The Committee has seen that they help cultivate a sense of pride, transforming housing into homes. A transcript of the meeting can be found <u>here</u>. The meeting can be viewed <u>here</u>.

Is London a 15-minute city?

The COVID-19 pandemic prompted a re-evaluation of urban design models. The national and local lockdowns had a major impact on how people experienced their neighbourhoods due to remote and hybrid working and people spending more time within their local community.

In October, the Committee explored how the changes brought on by the pandemic influenced Londoners' need for communal space and access to local amenities.¹² This was done within the context of the current public discourse around the urban planning model of a "15-minute city," defined by urban planner Carlos Moreno "an urban set-up where locals are able to access all of their basic essentials at distances that would not take them more

¹¹ Planning and Regeneration Committee meeting, 12 September 2023, minutes

¹² Planning and Regeneration Committee meeting, 18 October 2023, minutes

than 15 minutes by foot or by bicycle."¹³ We spoke to a range of experts, including Catherine Gall, Executive Director, Chaire Entrepreneurship Territory Innovation (ETI) created by Carlos Moreno, Didier Chabaud and Florent Pratlong and specialized in challenging conventional city planning models. The ETI Lab is well known today for their "15minute City Model." Other guests included Nicholas Boys Smith, Director, Create Streets; Matthew McCartney, Senior Researcher, Charter Cities Institute; Dr Enrica Papa, Associate Professor, Transport Planning and Management, University of Westminster, and Jonathan Lloyd, Corporate Director of Strategy and Change, Waltham Forest.

Our investigation found that there is no single blueprint for urban design that can be implemented across every London neighbourhood, and the differences between inner and outer London need to be particularly considered. The suitability of 15-minute neighbourhoods depends on factors like existing infrastructure, urban density, and residents' preferences.

There are also considerable challenges to designing urban spaces that are suitable for the various communities across the city with different needs. During our investigation, we heard about some of these challenges, including affordability, satisfying safety concerns and ensuring there is community support for proposed changes. Resident engagement was therefore recognised as critical by Catherine Gall. The Committee heard how practical, acceptable changes were needed to improve active travel options within communities, and improving access to public transport, over more blunt measures that risked inconveniencing residents.

Some panellists told us that the term "15-minute city" has in itself become problematic and may not be the most appropriate term for urban planning. Matthew McCartney, Senior Researcher, The Charter Cities Institute argued that the idea of the 15-minute city is just one in a long line of similar concepts throughout history, including neighbourhood units and mixed-use walkable neighbourhoods. He emphasised that accessibility and affordability are more relevant and practical considerations than the 15-minute city concept. He highlighted that the suitability of transport options varies greatly between urban and rural areas for example – i.e. you might not need a car in central London but you do in the suburbs and countryside. Other panellists agreed that focusing on making areas more walkable and improving public transport access might be more practical and acceptable to the public than strictly sticking to the 15-minute neighbourhood concept. A transcript of the meeting can be found <u>here</u>.

¹³ Carlos Moreno et al., <u>Introducing the "15-Minute City": Sustainability, Resilience and Place Identity in Future</u> <u>Post-Pandemic Cities</u>, 2021.

Improving accessibility

In November, the Committee examined how the planning system can improve accessibility for Londoners, with a specific focus on Disabled people.¹⁴ We spoke to several experts with lived experience, including members of the Deaf and Blind community and wheelchair users. During our investigation, we found that Disabled people continue to face barriers in the design of the built environment, which is impacting their ability to participate in society. We heard about issues ranging from the inaccessibility of the street space, such as obstacles on pavements, clutter, dockless bikes and e-scooters, to the shortage of suitable housing.¹⁵ The evidence we heard highlights the need to further integrate accessibility into future planning policies and be bolder in our ambitions to design a truly accessible city. The Planning for London Programme needs to ensure that the 13.2 per cent of Disabled people in London can navigate and access the city without facing obstacles or limitations. Transcripts for the meeting can be found here and here. The meeting can be viewed here.

Can crime be 'designed out'?

During our investigation into the design of social housing in September 2023, we heard conflicting evidence on the impact that design can have on crime and antisocial behaviour. In January 2024, the Committee subsequently held a meeting on this issue, specifically examining the role of the Metropolitan Police Service (MPS) in the built environment.¹⁶ The MPS has a team of specialist police officers, known as Designing Out Crime Officers (DOCOs), who are responsible for advising on the design of the built environment from preplanning through to the full planning process. DOCOs liaise with architects, developers, and local authorities to incorporate crime prevention measures in the built environment. This includes providing guidance on the security of new buildings and the refurbishment of existing buildings to ensure they are safe and secure.¹⁷ DOCOs also respond to planning applications on behalf of the MPS.

During its meeting, the Committee specifically examined the "Secured by Design" (SBD) initiative. The Committee heard varying perspectives on the effectiveness of SBD in reducing crime and its impact on community cohesion. Our guests, including architects, academics, and MPS officers, told us about the potential conflict between SBD principles and inclusive design policies. Through the investigation, the Committee learnt that there is currently a limited evidence base for the assessment of SBD principles. We call for a new GLA research initiative to inform evidence-based decision-making for the future implementation of SBD, as well as the publication of London Plan Guidance (LPG) to guide developers and local authorities in balancing safety and inclusivity.

¹⁴ The Equality Act 2010 defines a person as having a disability if: a) they have a physical or mental impairment and b) the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities. See Equality Act 2010, Section Six

¹⁵ Planning and Regeneration Committee meeting, 28 November 2023 <u>Panel 1 minutes</u>, <u>Panel 2 minutes</u>

 ¹⁶ Planning and Regeneration Committee meeting, 30 January 2024, <u>Panel 1 minutes</u>, <u>Panel 2 minutes</u>
¹⁷ Secured by Design

What is 'Secured by Design?'

"Secured by Design" (SBD) is a police security initiative and the main tool through which DOCOs analyse crime prevention through building design and product security.¹⁸ SBD integrates crime prevention into the planning process and sets police security standards for the building industry.¹⁹ SBD's 'Design Guides' aid the construction sector in meeting security requirements, aligning with national Building Regulations.²⁰ SBD supports DOCOs who collaborate with architects, developers, and local authorities to implement crime prevention measures in the built environment.²¹ DOCOs also respond to planning applications on behalf of the MPS and offer guidance under the SBD scheme.²²

Additionally, during our investigation, the Committee's guests highlighted issues of public awareness and transparency in the planning process. We heard about issues ranging from a lack of consultation with groups such as young people to a potential lack of resident awareness of the work of the MPS in the built environment. The Committee concluded that the Planning for London programme must ensure broad community engagement and transparency and accountability over the MPS' role in designing our communities. To this end, we made recommendations to the Mayor to implement an internal scrutiny mechanism to review and assess the MPS' advice on developments in London and to grant the Planning and Regeneration Committee access to the results of this work, at its discretion. Transcripts for the meeting can be found <u>here</u> and <u>here</u>. The meeting can be viewed <u>here</u>.

A city for women and girls is a city for all

In February of this year, the Committee held its final meeting on gender-informed planning. We convened an all-female panel with guests including the charity Make Space for Girls, academics and GLA colleagues who shared their insights into how the safety and wellbeing of women and girls is hugely influenced by how we design our public spaces.²³ The tragic murder of Sarah Everard in March 2021, and the subsequent murders of women such as Sabrina Nessa and Zara Aleena have brought renewed attention to the safety of women in public spaces. The murder ignited conversation about not only the issue of violence against women but also the myriad of ways in which women alter their behaviour, oftentimes unconsciously, when navigating their everyday lives.

¹⁸ Secured by Design

¹⁹ Ibid.

²⁰ Secured by Design, <u>Design Guides</u>

²¹ Secured by Design

²² GLA, MQT, <u>Police Influence on Public Spaces/Secured by Design</u>, June 2022

²³ Planning and Regeneration Committee meeting, 29 February 2024, minutes



The Committee with panellists at the genderinformed planning meeting on 29 February 2024. From L to R: Assembly Member Siân Berry, Assembly Member Elly Baker, Marina Milosev, Assembly Member Sakina Sheikh (Chair), Tayo Isa-Daniel, Susannah Walker, Sarah Considine, Assembly Member Emma Best, Olivia Theocharides-Feldman and Alison Bradshaw.

At our meeting, we heard that because of the experience of fear, a 25-year-old woman has less mobility than a 16-year-old boy. The safety of women was just one of the issues that was raised at our meeting. Other issues included the exclusion of teenage girls in parks, lighting and the lack of women in the planning profession and the possible need for more car parking spaces in key locations in outer London. As with previous investigations, the Committee heard of the need for more data, specifically on how women travel around London, how they access public spaces and what they need in the built environment. We also heard examples of good practice, not just in the UK but across the world. We were told that in Bogotá, the vast majority of women do unpaid care work as their main activity. To tackle what Tayo Isa-Daniel, Urban Researcher, Architect and Senior Design Researcher at AtkinsRéalis, described as a "machismo" culture, the city's first female Mayor created a 'care block' system where women can, within a 15-minute radius, access a range of services such as day-care services, school courses and legal aid.

In November 2023, the Mayor stated that the safety and inclusion of women and girls in public spaces was "an emerging priority in the Planning for London programme."²⁴The Committee's investigation underscores the importance of designing the built environment around the needs of women and girls. As our guests highlighted – a city that works for women and girls, is a city that works for everyone. A transcript for the meeting can be found <u>here</u>.

²⁴ GLA, MQT, Girls and the Public Realm, 16 November 2023

Following our investigation into the concept of the 15-minute city, the Chair of the Committee reflected on the Committee's findings. The piece (below) was published on the London Assembly website.

London and the 15-minute city

With the 15-minute city concept becoming more prominent within the media and amongst urban planners, Chair of the London Assembly Planning and Regeneration Committee Sakina Sheikh AM discusses the impact of this concept on London and the Committee's recent evidence gathering session in this area.



The COVID-19 pandemic brought inconceivable challenges to London. We spent weeks at a time without seeing our loved ones, with many people isolated, unable to carry out daily tasks like going to the shop for some milk and bread.

A lack of communal, open spaces within neighbourhoods in London made the lockdowns even more challenging. When your time outside is limited, how easily you can access the shops, open spaces and facilities you require becomes even more important.

The 15-minute city is an urban planning model that aims to deliver neighbourhoods with the necessities of modern life, including access to jobs, public services, recreational facilities, and other basic amenities to be available within a 15-minute walk or cycle from home.

The concept itself is not new. History has shown similar concepts come to the fore, such as the 'garden city movement' in the late 1800s and the 'new town movement' post World War II. All these concepts, whilst having different titles, in the main, seek to make amenities more accessible and beneficial to local people.

The London Assembly Planning and Regeneration Committee carried out an investigation into the 15-minute city concept in October 2023. It initially seemed confusing that the idea of having all the services you need for a thriving life within a 15-minute reach from your home had caused controversy. However, as our investigation and research began, it became clear that there were issues to consider.

The restrictions necessitated by the COVID-19 pandemic have made many of us more acutely sensitive to changes in our environment and our freedom of movement. It is likely that this is still playing out in many people's social recovery from the pandemic, and the 15-minute city concept seems to have been caught in the middle of it.

Catherine Gall Director at Chaire Entrepreneurship Territory Innovation, who works alongside the founder of the 15-minute city concept, told the Planning and Regeneration Committee during our investigation: "If I am to leave you with one thing today, it would be to ditch the name '15-minute city' and focus instead on the principles of design behind the concept."

Catherine was right, and we can go even further by ensuring we enable people to feel like they are part of designing the way our city is being shaped for the future. This has been a key aspiration for the Planning and Regeneration Committee over the years – to find meaningful ways of engaging Londoners in planning and design that goes beyond the traditional buzz word of 'consultation.'

As active travel becomes core to our transport strategy in London, our Committee continues to ask how planning and regeneration from City Hall can ensure that the necessary infrastructure is being built. This includes pushing for more public toilets, ensuring accessibility for those with limited mobility is a prioritised provision and continuing to enhance the outer London transport offers.

We are committed to ensuring the diverse voices and experiences in Londoners are uplifted and represented. For instance, another one of our Committee's guests Matthew McCartney, Senior Researcher at Charter Cities Institute, pointed out, not all services need to be provided within 15 minutes from homes – the key is affordability and mobility: "A survey from 2013...showed that within a 45-minute commute by public transport Londoners can access 54 percent of the city's jobs, which means that mobility is functioning fairly successfully in London."

In addition to Catherine and Matthew, we were fortunate to be joined by other expert guests during our Committee's investigation and offer our many thanks for their input and expertise: Nicholas Boys Smith, Director, Create Streets; Dr Enrica Papa, Associate Professor, Transport Planning and Management, University of Westminster, and Jonathan Lloyd, Corporate Director of Strategy and Change, Waltham Forest.

We heard from them about international comparisons, the historic evolution of the concept of 15-minute cities and related planning approaches, and how this is playing out at a London wide level. We were told that having infrastructure that is close by and accessible within 15-minutes is important but also that this wasn't something that could be achieved for everyone - which is why mobility, giving people options about how they move around towns, neighbourhoods and cities, is vital. It was also noted that many outer London areas would be less conducive to 15-minute travel, given their larger area and lower access to public transport.

The Committee believes that through improving urban planning models which consider the needs of their communities, we can improve health, wellbeing, and local economic productivity. This has the potential to bring communities closer to the amenities they need, but the messaging and narrative around the 15-minute city concept requires more work. Perhaps even a rebranding all together.

LONDONASSEMBLY

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Sakina Sheikh AM Chair of the Planning and Regeneration Committee

Sadiq Khan Mayor of London (Sent by email)

18 March 2024

Dear Sadiq

I am writing to you on behalf of the London Assembly Planning and Regeneration Committee to share with you the findings and recommendations from our investigation into how the planning system can improve accessibility for Londoners.

For this investigation we held a one-off meeting on 28 November 2023 with two panels. The first panel included relevant stakeholders and those with lived experience:

- Dr Teri Okoro, Founder and Director, TOCA Architects
- Jane Wilmot OBE, Chair of Hammersmith and Fulham Inclusive Design Review Panel
- Hallie Banish, Campaigns and Communications Manager, Ruils
- Laura Vicinanza, Policy and Stakeholder Engagement Manager, Inclusion London
- Fara Muneer, Head of Business Development, Centre for Accessible Environments
- Harriet Bell, Disabled London worker, speaking from personal experience.¹

¹ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

During the second panel, we were joined by **Jules Pipe CBE**, Deputy Mayor for Planning, Regeneration and Skills, and **Lisa Fairmaner**, Head of London Plan and Growth Strategies for the Greater London Authority (GLA).²

Our investigation builds on previous work carried out by the Committee in 2022-23 examining the future of planning in London.

This letter presents the Committee's recommendations, which you should consider as part of the Planning for London programme and take forward in the next iteration of the London Plan.

Barriers to accessibility

The built environment can present extensive challenges for Disabled people, as the design, layout and supply of homes, public spaces and transport modes can play a significant role in accessibility and inclusivity. Data from the National Travel Survey for instance, found that in 2021, Disabled adults in England made 28 per cent fewer trips than those adults who are not Disabled.³

During our investigation, there was consensus among our panellists that Disabled people face specific challenges going about their daily lives. Road and street design emerged as a significant concern, with guests pointing to issues such as the absence of dropped kerbs, obstructions, and excessive clutter.

Guests also highlighted difficulties encountered with inaudible pedestrian crossings and narrow cycle lanes unsuitable for non-standard bicycles which further compound the difficulties faced by Disabled people in navigating the streets of London.⁴

Public transportation more broadly was also mentioned. Guests told us of difficulties Disabled people face in planning their journeys and routes. We heard from Laura Vicinanza, Policy and Stakeholder Engagement Manager at Inclusion London, that only 92 out of 270 tube stations were fully accessible.⁵ The Committee notes that a lack of information prevents appropriate journey preparation, meaning a Disabled person could come across an unexpected obstacle, such as a bus stop too close to a cycle lane; disrupting their journey.⁶

We also heard about the need for more accessible housing. Guests at our meeting told us that accessibility needs to consider not just the living space, but the boundaries of the dwelling, from parking to lift access, as well as integrating housing into the wider built environment, so that residents with impairments can easily access transport and other services.⁷ In 2019-20, the English Housing Survey found that one in five households included someone with a limiting long-

² Planning and Regeneration Committee meeting, 28 November 2023 Panel 2 minutes

³ Gov.uk, <u>Disability, accessibility and Blue Badge statistics: 2021 to 2022</u>, January 2023

⁴ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

⁵ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

⁶ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

⁷ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

term illness or impairment, whose condition made it necessary to have adaptations in their home, considered their accommodation to be unsuitable.⁸

London's strategic position in influencing public realm design provides a vital opportunity to make our city accessible for everyone. The 2021 Census tells us that 13.2 per cent of people are Disabled in London. ⁹ The Committee is clear that those who are Disabled must have equal opportunity to enjoy the vast infrastructure of London, without fear of barriers or challenges.

Good practice and the London Plan

The Committee's investigation examined the extent to which the London Plan 2021 addresses the challenges faced by Disabled individuals in navigating the built environment.

Differences in culture and practice across London's boroughs were highlighted during our investigation. Harriet Bell, a Disabled London worker with personal experience, noted: "There are different cultures and perhaps there is a feeling that inclusive access is something for authorities within the Central Activity Zone (CAZ) perhaps more than the outer boroughs."¹⁰

Dr Teri Okoro, Founder and Director at TOCA Architects told us that these differences meant that there were questions over the extent to which good practice can be shared, and how to better foster a culture within the design process that encourages accessibility through the entire planning process:

"[O]n the local authorities and different cultures and practices, sometimes it is to do with the funding, so they have to be innovative in how they get the resources. Waltham Forest [Council] has good practice. They have an Access Consultant embedded in the Planning department, who looks at all the planning applications. They may be funded by Community Infrastructure Levy (CIL). We know that the planners themselves may not be knowledgeable to be able to review the designs. They probably need to upskill themselves to some kind of basic level and then be able to have the resources to call on internally as well as external panels to look at it."¹¹

Recommendation 1

The Mayor should establish a working group comprised of members from across local authorities in London, to collect and collate evidence on good practice on accessible design. Drawing on this evidence, the Mayor should create a good practice guide on accessible design in London, and share this with local authorities and developers.

⁸ DLUHC, English Housing Survey 2019 to 2020: home adaptations, 8 July 2021

⁹ Trust for London, <u>Census 2021 deep dive: disability and deprivation in London</u>, August 2023

Using the definition under the Equality Act 2010: The Equality Act 2010 defines a person as having a disability if: a) they have a physical or mental impairment and b) the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities. See <u>Equality Act 2010</u>, <u>Section Six</u>

¹⁰ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

¹¹ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

Lack of compliance with inclusive design standards

The Committee heard how there is a lack of compliance with inclusive design due to a flawed understanding of what inclusive design entails across the various actors responsible for delivering new developments. In 2022, the GLA's Placeshaping Capacity Survey found that there were just ten full-time equivalent (FTE) inclusive design or accessibility officers across all boroughs.¹²

At our meeting, Jane Wilmot OBE, Chair of the Hammersmith and Fulham Inclusive Design Review Panel told us: "I have observed how many times people could drop the ball. Consultants not understanding inclusive design, the developer not making sure that the consultant and the contractors comply with inclusive design."¹³ She also stated that while the London Plan is "very good at the beginning of the [planning] process,"¹⁴ there are opportunities after that for developers to make amendments to the detriment of accessibility: "there are so many ways of dropping the ball between giving planning approval…approval at the beginning is one thing, but what you need is to follow it through and many developers do not always follow it through because nobody is looking."¹⁵

Fara Muneer, Head of Business Development, Centre for Accessible Environments expanded on this further, stating that building control officers, who are responsible for ensuring that building regulations are complied with, often need more training to enforce inclusive design standards:

"from when the planning is granted, there are conditions, there may well be, but this is really down to building control. Typically, you will have a local authority building control officer or you may have an approved building control officer in the sense that they may be run by private companies. That is where we would want some training or some sort of enforcement."¹⁶

The Committee notes the critical role Building Control Officers have in ensuring that compliance is being met throughout the development process. We are confident that through broadening their awareness of inclusive design principles, they will be better able to ensure that accessible designs are delivered from the planning stage through to completion.

Recommendation 2

The GLA should create a training programme for Building Control Officers to ensure they are aware of how developments can comply with London Plan policies on improving accessibility for Disabled people.

Engagement and co-production

The Committee heard of the importance of accountability throughout the planning process, aligning with the London Plan. Hallie Banish, Campaigns and Communications Manager at Ruils,

¹² Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

¹³ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

¹⁴ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

¹⁵ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

¹⁶ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

told us, that despite good intentions, some planning authorities approve refurbishments that compromise accessibility, such as replacing ramped entrances with steps:

"there are a lot of great intentions there, but we are seeing planning authorities passing many submissions for refurbishment that degrade accessibility. It is challenging to then go back and say, "The previous design was more inclusive." There is a lack of engagement and co-production with local Deaf and Disabled people. Embedding co-production into the London Plan and saying, "This is best practice.""¹⁷

Other guests also highlighted the need for greater engagement and co-production¹⁸ with local Deaf and Disabled communities to ensure best practices are embedded in the London Plan. Laura Vicinanza told us:

"there isn't a meaningful co-production with Deaf and Disabled people locally. What that means is that we end up designing places which are discriminatory by design, and we build inequalities into places. We could prevent that if we spoke to people locally. There's a need for greater engagement and co-production with local Deaf and Disabled communities to ensure best practices are embedded in the London Plan."¹⁹

The Committee notes the need for diverse voices, especially from those who have suffered the consequences of inaccessible design to be heard through the planning process, to ensure that proposals and new developments are considerate to the needs of the local community. The Committee heard that one way this could be achieved is through Access Panels, which consist of volunteers who work to improve access and inclusion for Disabled people in their local community. Fara Muneer told us: "we would wholly recommend that all local authorities have an Access Panel, primarily made up of Disabled people and maybe access expertise as well."²⁰

Recommendation 3

The Mayor should mandate the creation of Local Authority Access Panels in all London boroughs to provide oversight over new planning applications. These panels should include Disabled people from the local community. In determining the remit of the Access Panels, the Mayor should consider how to ensure they are able to provide:

- guidance and critical advice on accessibility in planning applications
- suggestions on how improvements to accessibility can be made before approval is given
- oversight of changes to initial applications during the development process that may impact overall accessibility.

¹⁷ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

¹⁸ Hammersmith and Fulham's Disabled People's Commission has a working definition of co-production: "Coproduction (working together) means local Disabled residents are working together with decision makers to actively identify, design, and evaluate policy decisions and service delivery that affect our lives and remove the barriers we face." See: <u>Hammersmith and Fulham, Nothing About Disabled People Without Disabled People</u>

¹⁹ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

²⁰ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

Stronger data and setting targets for wheelchair accessible homes

It is difficult to know how many Londoners are Disabled as definitions can often vary.²¹ Data on Disabled people is also difficult to measure as there is currently no national or regional register of Disabled people.²² Some London boroughs operate voluntary registers to plan for future service provision, yet it is not compulsory for residents to register.²³ Information provided by these registers is therefore incomplete and may not provide a full representation of the Disabled population.²⁴ Available statistics on disabilities across the UK are captured through surveys. This means that data on Disabled people relies on self-reporting.²⁵

In addition, the Committee also heard the need for stronger targets for accessible housing. The Committee notes the London Plan requirements for a percentage of new residential developments to ensure that a) at least 10 per cent of dwellings meet Building Regulation requirement M4(3) on 'wheelchair dwellings' and b) all other dwellings (90 per cent) meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'²⁶ Of the 10 per cent of homes that are expected to meet Standard M4(3) on wheelchair user dwellings, homes are distinguished between 'wheelchair accessible' (a home readily usable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a wheelchair user).²⁷ However, Laura Vicinanza told us:

"We want to see targets being introduced for M4(3)A [wheelchair accessible] and M4(3)B [wheelchair adaptable] because we really want to monitor to what extent wheelchair user homes that are being built are actually fully accessible or adaptable. We are concerned that developers are more likely to build wheelchair-adaptable because it saves them money and is not really cost-effective for the public purse either, and not good for Disabled people."²⁸

Laura also noted the lack of data on the tenure of these homes and wider data on unmet housing need for Disabled people in London:

"We have analysed the London Strategic Housing Market Assessment (SHMA) from 2017 and there is a scarcity of data around people with protected characteristics more generally: LGBTQ+ people, ethnic minority communities and Disabled people. We need to make sure that the GLA captures the identified unmet housing need. We want to know what the current situation is in London. How many new or not-new homes do we need that are accessible? For example, the Mayor of London said 66,000 homes are needed every year and of these a certain proportion needs to be genuinely affordable. Why can we not know how many are needed every year that are accessible? This is key, important

²⁶ GLA, London Plan 2021

²¹ House of Commons library, <u>UK disability statistics: Prevalence and life experiences</u>, August 2023

²² House of Commons library, UK disability statistics: Prevalence and life experiences, August 2023

²³ House of Commons library, UK disability statistics: Prevalence and life experiences, August 2023

²⁴ House of Commons library, <u>UK disability statistics: Prevalence and life experiences</u>, August 2023

²⁵ House of Commons library, <u>UK disability statistics: Prevalence and life experiences</u>, August 2023

²⁷ GLA, London Plan 2021, Policy D7 Accessible Housing

²⁸ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

information. However, if we do not have this information, how are we expecting even local authorities to plan and deliver the right kind of housing?"²⁹

Fara Muneer told the Committee that the 90 per cent and 10 per cent requirements were "brilliant," but asked: "how many of these accessible homes are being built and critically how many are being used by the end user? We would really appreciate having that knowledge base. That could inform the next review of the London Plan."³⁰ She went on to note that, critically, these figures were not being translated across boroughs:

"Within London local authorities the data, when we looked at it, was less than 50 per cent had translated it. There is a lot of ambiguity. In terms of local authorities, from what I have seen, and I have previously worked in a local authority, is a lack of data. If you are forecasting ahead in terms of the need for wheelchair accessible homes, surely you should have that data from your Children and Young People's teams and your Early Years, and you are not just thinking of the individual, you are thinking of the family as well. It is the tenure of what is available as well, in terms of wheelchair accessible homes."³¹

Recommendation 4

In order to gain a better insight into the targets that need to be set to meet the housing needs of Disabled people in London, the GLA should capture and publish data on:

- A breakdown of 'wheelchair accessible' and 'wheelchair adaptable' housing being built. This data should be published in the Planning London Datahub on an annual basis.
- Affordable housing starts and completions by type and how many of these are wheelchair accessible. This data should be published as part of the GLA's quarterly statistics on affordable housing starts and completions.

Recommendation 5

Using the additional data captured, the GLA should assess whether there is evidence to support an incremental increase in the 10 per cent target for wheelchair accessible housing over the course of the next London Plan.

The Committee would welcome a response to this letter by 31 May 2024. Please address your response to Memuna Hussain, Senior Policy Adviser, at memuna.hussain@london.gov.uk.

Yours sincerely,

Thiff

Sakina Sheikh AM Chair of the Planning and Regeneration Committee

²⁹ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

³⁰ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

³¹ Planning and Regeneration Committee meeting, 28 November 2023 Panel 1 minutes

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Sakina Sheikh AM Chair of the Planning and Regeneration Committee

Sadiq Khan Mayor of London (Sent by email)

18 March 2024

Dear Sadiq

I am writing to you on behalf of the London Assembly Planning and Regeneration Committee to share the Committee's findings and recommendations from its investigation into the Metropolitan Police Service's (MPS) involvement in the built environment and our planning system, particularly in relation to Secured by Design (SBD) principles.

The Committee held a meeting on 30 January 2024 with two panels. The first panel included architects, academics and specialist MPS officers:

- Guy Ferguson, Chief Executive Officer, Police Crime Prevention Initiatives (CPI)
- **Dr Elanor Warwick**, Head of Strategic, Policy Evidence and Research at Clarion Housing Group (attended in her capacity as the author of *Defensible space on the move: Mobilisation in English housing policy and practice*).
- Phineas Harper, Opinion Columnist, The Guardian
- Russell Curtis, Founding Director, RCKa Architects
- David Lucy, Designing Out Crime Officer, Metropolitan Police Service

• Martin Hubbard, Designing Out Crime Officer, Metropolitan Police Service.¹

In the second panel we were joined by **Jules Pipe CBE**, Deputy Mayor for Planning, Regeneration and Skills, and **Lisa Fairmaner**, Head of London Plan and Growth Strategies for the Greater London Authority (GLA).²

The recommendations outlined in this letter aim to foster a more collaborative, communitycentric and inclusive approach to urban design, ensuring that the built environment reflects the diverse needs and aspirations of Londoners. We urge you to consider them as part of the Planning for London programme.

During the investigation it emerged that there can be a tension between designing to create inclusive communal spaces in our public realm, and advice from the Metropolitan Police on reducing 'permeability' of crime in our public spaces. The Deputy Mayor identified that inclusive design principles will often carry more weight in this balance and we hope to see this continue in the policies of the next London Plan.

Research and Evaluation

During our investigation we heard differing views as to the success of Secured by Design (SBD). Guy Ferguson, Chief Executive Office at Police Crime Prevention Initiatives (CPI), highlighted to the Committee the positive impact of SBD in reducing burglary and other crimes. Ferguson also emphasised its benefits in community cohesion and carbon cost reduction.³ David Lucy, a Designing Out Crime Officer for the MPS, told us: "My team work with hundreds of firms of architects across the year and over the years and have really seen a value and a benefit of SBD and the benefit that it is giving to their development and the people and businesses that subsequently occupy those."⁴ Russell Curtis of RCKa architects, agreed that SBD had some positive impacts with regard to reducing antisocial behaviour in public spaces and within developments. He argued, however, that SBD advocates were occasionally opposed to the development of spaces that would be beneficial for the overall wellbeing and cohesion of communities.⁵

Dr Elanor Warwick, an academic expert, explained to the Committee how opposing views on SBD have evolved. She stated that the measurements used over time to assess interventions aimed at designing out crime have changed, making it difficult to determine causality, with various competing claims over the extent to which crime has been reduced. She argued that the need to collect more qualitative data, learning from residents, and evaluating their experiences, could potentially help bolster the academic evidence concerning SBD efforts, and help identify what works, and what does not.⁶ While David Lucy told the Committee "There is lots of academic research to show the successes of SBD" he also acknowledged that "In terms of academic research, we could do it more, there [are] always gaps."⁷

¹ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

² Planning and Regeneration Committee meeting, 30 January 2024, Panel 2 minutes

³ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

⁴ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

⁵ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

⁶ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

⁷ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

The Committee welcomed understanding the principles of SBD to create safer spaces in London, however we note that in practice, the evidence in support of different MPS interventions in London is limited.

Recommendation 1

The Mayor should commission a new research initiative to produce quantitative and qualitative analysis of SBD related decisions. The research should draw on quantitative data, such as crime rates recorded across a development. The data collected from this research should be considered as part of the wider evidence base used to set policies in the London Plan for future iterations, as well as future implementation of Secured by Design.

Inclusive design

Guests at our meeting, such as architect Russell Curtis, argued that the principles behind SBD could inadvertently discourage young people from using public spaces, and that guidance was not always aligned with the needs and behaviours of the diverse communities that ultimately live in these spaces. He said:

"I do worry about the impact of SBD on young people, for example, and how young people experience and occupy the city. A lot of this seems to be dissuading them, and they have as many rights as everybody else to live in a city and to enjoy it and make the best of it, but they behave in different ways to you or me. A lot of the guidance in here, or the recommendations in this guidance, do not think about that. It is all about protecting space or protecting people from having to see young people occupying public space, which I find problematic."⁸

In contrast, David Lucy stressed to the Committee that the SBD approach was often subject to misconceptions. He told us that it was "not about high fences...blocking off public spaces...creating gated communities"⁹ but about creating spaces that people could look after on their own. Martin Hubbard, another Designing out Crime Officer in the MPS, added that there were limitations to SBD due to existing urban designs, and that the MPS could only influence elements of the design process, targeting specific areas which could improve the safety of the community.¹⁰

Phineas Harper, Opinion Columnist at The Guardian, told the Committee that SBD guidance often failed to address challenges through a holistic lens. Harper cited SBD's guidance on schools that used the word "surveillance" much more than "learning" as evidence of a disconnect between the needs of those who use spaces, and the underlying principles behind their design. Harper went on to suggest that empowering local authorities to better incorporate community perspectives in the design process would help broaden the approach that designers were able to take through the development process.¹¹

The Deputy Mayor for Planning, Regeneration and Skills, Jules Pipe, and Lisa Fairmaner, Head of London Plan and Growth Strategies at the GLA, were asked about the potential imbalance between the principles of SBD and inclusive design policies in the London Plan. They agreed that the concept of "inclusion" was often at the heart of tensions between different approaches, and

⁸ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

⁹ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁰ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹¹ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

that there were competing priorities in the design of urban spaces. It was suggested, however, by Lisa Fairmaner that in instances when tensions arose, inclusion would "always win out" per the guidance accompanying the London Plan.¹²

It was also suggested by another panellist that local authorities often give significant weight to comments they receive from the police and that the London Plan should offer more clarity on how this balance can be struck. As Phineas Harper told us: "Often it is the police's advice that is taken to be the most sacrosanct and it is the other bis that get cut out." ¹³

Recommendation 2

The Mayor should publish London Plan Guidance (LPG) on inclusive design for developers, local authorities and planning authorities to follow throughout the design process. In doing so, the LPG should collate and present examples of good practice where tensions arise between "inclusive design" and "safety." This guidance should also set out good practice on public consultations with specific groups who are typically less likely to engage with open consultation processes, such as young people.

Public awareness and transparency

Another issue raised at our meeting was a lack of engagement with communities and other potential users of space on a development. Phineas Harper pointed out that there was a general "problem of consultation" but that even the options communities were presented with were often "extremely narrow."¹⁴ Harper told the Committee:

"I was aware of a sort of small tower which had a kind of forecourt and residents were frustrated with people walking through that forecourt and the solution was we will put some gates on it. Now they do not know their neighbours, it is harder to get in...There was never an option of what if we made the forecourt nicer? What if we put some planting in? What if we repainted it or did those repairs that we have been leaving for decades? Often there is an impulse towards: stick a gate on it, stick a fob on it, stick a fence around it, when a more holistic, a more intelligent solution could be to make it nicer, provide more social infrastructure, make sure that people feel more invested in that space. That is the sort of intervention that will make a place feel safer and be safer rather than this instinct to securitise it, put in CCTV, which often seems to lead to a deterioration of people feeling safe and secure in that place."¹⁵

Russell Curtis added that very rarely were voices heard equally during the consultation process. Those that were "most vocal" often dominated proceedings, at the expense of broadening the number of voices heard, and could leave some groups, for example young people, disconnected from the design process.¹⁶

Dr Elanor Warwick added further evidence to these points. While she noted examples of positive interactions between the MPS and certain changes in the development process, this often fell

¹² Planning and Regeneration Committee meeting, 30 January 2024, Panel 2 minutes

¹³ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁴ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁵ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁶ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

"on the shoulders of a few individuals within communities."¹⁷ She went on to highlight the need for collective responsibility over the security and safety of communities, stating:

"If we are going to take feeling safe in our communities long-term really seriously, there needs to be as much support to really, really get people to engage, to feel that they have the right to take this collective responsibility for the security and safety of our communities. That needs to be supported. That needs to be supported in the same way as public consultation around particular schemes is supported."¹⁸

When previously questioned over the extent to which the MPS intervened or changed a public space, you stated that the MPS did not distinguish whether a development was public or private in nature nor did it record suggestions or modifications made to planning applications.¹⁹ The Committee is concerned that this lack of information could potentially limit the extent to which the public and the London Assembly can effectively engage with the MPS and design process to make spaces safer.

Recommendation 3

The Mayor should implement a transparent and accountable process for communicating the Metropolitan Police Service's (MPS) suggestions or modifications to planning applications. To ensure transparency and resident awareness, we recommend establishing an internal scrutiny mechanism within the Mayor's Office for Policing and Crime (MOPAC) to review and assess the MPS' advice on developments in London. This scrutiny process should focus on maintaining accountability without necessarily making the details public, thereby upholding the confidentiality of sensitive information. Results of the scrutiny can be communicated through established channels within the Mayor's office, ensuring a responsible and informed decision-making process while respecting the need for confidentiality. To facilitate an additional layer of oversight, the London Assembly Planning and Regeneration Committee should be granted access to these results, at its discretion.

The Committee would welcome a response to this letter by 31 May 2024. Please address your response to Memuna Hussain, Senior Policy Adviser, at memuna.hussain@london.gov.uk.

Yours sincerely,

Thill

Sakina Sheikh AM Chair of the Planning and Regeneration Committee

¹⁷ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁸ Planning and Regeneration Committee meeting, 30 January 2024, Panel 1 minutes

¹⁹ GLA, MQT, <u>Safe by Design</u>, November 2022

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Sakina Sheikh AM Chair of the Planning and Regeneration Committee

Sadiq Khan Mayor of London (Sent by email)

18 May 2024

Dear Sadiq,

I am writing to you on behalf of the London Assembly Planning and Regeneration Committee to share the Committee's findings and recommendations from its investigation into genderinformed planning. Our investigation considered how women and girls are affected by the design of the built environment, and the extent to which the needs of women, girls, and gender-diverse people are considered within the planning framework in London. The recommendations from this investigation should be considered as part of the Planning for London programme, which will inform the next iteration of the London Plan.

The Committee held a meeting on 29 February 2024 which included the following guests:

- Marina Milosev, Team Leader, London Legacy Development Corporation (LLDC)
- Susannah Walker, Co-founder and Trustee, Make Space for Girls
- Olivia Theocharides-Feldman, Founding Associate, Julia King (JK) & Associates
- Sarah E. Considine, Principal Project Officer, Good Growth by Design, GLA
- Alison Bradshaw, Spatial Planning Area Team Manager (West), Transport for London
- Tayo Isa-Daniel, Urban Researcher, Architect and Senior Design Researcher, AtkinsRéalis

We also received a written submission from:

• Tiffany Lam, Policy Lead, Sustrans.

The varied experiences of women and girls in the built environment

During our investigation, guests cited safety and perceptions of safety as having a big impact on how women and girls interact with urban environments. Olivia Theocharides, Founding Associate at JK&A told the Committee that, because of the experience of fear, a 25 year-old woman has less mobility than a 16-year-old boy.¹

Guests also told the Committee about the rates and impact of sexual harassment and assault women and girls are faced with in the UK. Not only does London have the highest rates of public sexual harassment in the UK, but 40 per cent of sexual assaults take place in public spaces, mostly on public transport.² Guests informed the Committee that young women and teenage girls experience over-sexualisation and scrutiny which undermines their sense of safety in public. Susannah Walker, co-founder and trustee at charity Make Space for Girls, shared research which found that most sexual harassment occurred between 3pm and 6pm – when girls are returning from school.³

There are many examples of shared experiences in how women and girls interact with their urban environment; guests told us that these are reflective of the varied characteristics of different groups of women and girls. Susannah Walker told the Committee about how some ethnic groups of young women were more likely to travel to Royal Parks as these parks have stricter rules on dogs.⁴

The design of public spaces and provision of infrastructure

During our investigation, we heard that the design of public spaces and provision of infrastructure is limiting women and girls' freedom and can deprive them of opportunities. Tiffany Lam, Policy Lead at Sustrans told the Committee:

"The absence of a gender lens in the built environment means that our cities are not designed to enable or encourage the full participation of women and girls in urban public life. This denies women and girls the right to the city – the right to access, shape and take advantage of urban life and amenities – and the right to safe mobility – the right to move around freely and safely, without fear of harassment or violence."⁵

Susannah Walker informed the Committee about a survey conducted by Make Space for Girls, which found that 90 per cent of facilities designed for teenagers, such as skate parks and sports courts, were used predominantly by teenage boys and men.⁶ Sarah Considine, Principal Project Officer in the GLA's Good Growth by Design Unit, told the Committee that varied spaces need to be built to prevent one group dominating the often single spaces that are available.⁷

¹ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

² Evidence submitted to the Committee, Tiffany F. Lam, 27 February 2024

³ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>. See also: College of Policing, <u>Mapping</u> <u>public space violence against women and girls</u>, December 2023

⁴ Planning and Regeneration Committee meeting, 29 February 2024, minutes

⁵ Evidence submitted to the Committee, Tiffany F. Lam, 27 February 2024

⁶ Planning and Regeneration Committee meeting, 29 February 2024, minutes

⁷ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

Lack of suitable spaces also means that often, girls have to travel further to find places which make them feel safer and have better activities and facilities.⁸ This demonstrates the additional thought processes that women and girls consider before heading out to socialise compared to their male peers and can come with additional costs which younger men do not have to pay. Guests at our meeting mentioned major retail locations such as Stratford Westfield as an example of an appealing place, with appropriate facilities, including toilets, and where women and girls could feel safe.⁹ We were pleased to hear that through the Good Growth Fund, over 300 more public toilets have been created through various projects.¹⁰ Marina Milosev, Team Leader at the London Legacy Development Corporation, commended the London Plan for having a gender-sensitive public toilets policy.¹¹

However, the Committee was told that more could be done to ensure that evidence-based design features that can improve safety for women and girls are implemented. Although guests warned the Committee that women and girls have diverse needs in the built environment, the Committee were informed of some design features that could improve feelings of safety and inclusion across different groups of women. Marina Milosev told us that good public lighting and well-maintained public spaces are some examples of good practice.¹² Susannah Walker summarised, the number one thing that makes women and girls feel safe in parks "is seeing other people like me."¹³

Gender-disaggregated data

Guests told the Committee that there is a lack of data available on women and girls in the built environment and that to support gender-informed planning decisions, gender disaggregated data should be collected.¹⁴ We were told that gender-disaggregated data could be derived from qualitative methods such as surveys or interviews. Tayo Isa-Daniel, Urban Researcher, Architect and Senior Design Researcher at AtkinsRéalis, told the Committee:

"There is a broad range that could be done, but this is only done when you have that constant engagement with communities, and you do take that time of blocking aside and engaging with them from the beginning all the way to the end and that is how you integrate that into the design process and then see through what the gaps are. Therefore, I think in terms of qualitative data that is where we could improve."¹⁵

[...]

"I think there are also opportunities...to work with stakeholders such as schools and also third spaces where a lot of youth would spend time in, for example in Whitechapel idea centres or libraries etc. because there is room in shaping that. So, to reach out to those third spaces but also flipping back to practitioners would be a good way to approach data collection."¹⁶

⁸ Planning and Regeneration Committee meeting, 29 February 2024, minutes

⁹ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

¹⁰ Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹¹ Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹² Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹³ Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹⁴ Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹⁵ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

¹⁶ Planning and Regeneration Committee meeting, 29 February 2024, minutes

Recommendation 1

In response to this letter, the GLA should update the Planning and Regeneration Committee on what steps it is taking to gather gender sensitive and disaggregated data to inform the development of the next London Plan and explain how data is informing action on better gender-informed planning.

Underrepresentation of women in the planning sector

Guests told the Committee about the importance of representation of women in the planning and built environment sectors. Sarah Considine asserted that although "representation in the sector and the right skills within the sector are going to be absolutely central to how this agenda lands" there is currently a "big problem with representation in the sector more broadly."¹⁷ This, she noted, has an impact on "the ability to see through some of the recommendations that we are making about what good practice looks like in terms of bringing in more varied perspectives to the development process."¹⁸ She told us that in 2020, only 32 per cent of jobs in the architecture sector were held by women, down from 40 per cent in 2018.¹⁹ In its "State of the Profession Report 2023," the Royal Town Planning Institute highlighted that women comprised 40 per cent of the planning profession in 2023.²⁰

The Committee was pleased to hear that the Mayor's Design Advocates (MDAs) are more than 50 percent female, and several are experts in gender planning and gender design.²¹ Since the recruitment of the MDAs, there has been an active effort from the GLA to upskill experts to look at the gendered dimension of planning.²²

The Committee also heard that the GLA have produced a London Design Review Charter that local authorities can sign up to, which includes a series of principles, one of which is around representation and inclusivity.²³ Design review panels provide independent and impartial advice on development proposals to local planning authorities. We were told that the GLA works with Urban Design London (UDL) to bring panels together on a regular basis, to upskill panels and share learnings.²⁴ The Committee notes that there is no specific reference to gender representation in the charter.²⁵ The GLA website also does not contain any information on which boroughs have signed up to the charter.²⁶

The Committee also heard that there is little data on the representation of women on Planning Committees and Planning Officers across London. We heard that the GLA's Placeshaping Capacity Survey 2022, a bi-annual survey of London boroughs on their capacity to manage, create and plan built development, does capture data on the number of inclusive design and

¹⁷ Planning and Regeneration Committee meeting, 29 February 2024, minutes

¹⁸ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

¹⁹ Planning and Regeneration Committee meeting, 29 February 2024, minutes

²⁰ RTPI, <u>State of the Profession 2023</u>, Nov 2023

²¹ Planning and Regeneration Committee meeting, 29 February 2024, minutes

²² Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

²³ Planning and Regeneration Committee meeting, 29 February 2024, minutes

²⁴ Planning and Regeneration Committee meeting, 29 February 2024, minutes

²⁵ GLA, London Design Review Charter

²⁶ GLA, <u>The London Design Review Charter (webpage)</u>

accessibility officers across London.²⁷ The Committee notes that the survey also looks at the gender pay gap but does not capture data on gender representation.²⁸

Recommendation 2

The GLA should build a broader knowledge base on gender diversity within the planning sector through its Placeshaping Capacity Survey 2026 by including specific questions about the gender composition of Planning Committees and Planning Officers across boroughs.

Recommendation 3

The GLA should update the London Design Review Charter to include explicit reference to the importance of design review panels taking on board different gender perspectives. The GLA should also publish, on its website, which boroughs have signed up to the charter.

Transport

Our investigation found that women often encounter specific challenges on public transport networks that can impact their safety, comfort, and overall mobility. In her written submission, Tiffany Lam noted that 55 per cent of women in London have experienced sexual harassment on public transport, mainly on the tube and that "tackling gender-based violence in London's public spaces and public transport network, therefore, must be a priority."²⁹ She also asserted that "gender is one of the most robust determinants of travel behaviour e.g. journey purpose, mode, travel time. However, considerations of gendered differences in urban mobility are often overlooked in transport policy and planning."³⁰ At our Committee meeting, we asked Alison Bradshaw, Spatial Planning Area Team Manager (West) at Transport for London (TfL), whether TfL collect disaggregated data on women and their travel patterns and needs. The Committee was told that it would hear in writing from TfL's data team.³¹

The Committee heard about the work conducted by TfL to address the safety of women and girls across the transport network. We heard how TfL have published an 'Equity in Motion' document which sets out its five-year ambition for the inclusive design of transport and looks at barriers in the public transport system.³² Alison Bradshaw told the Committee, within her role as Spatial Planning Area Manager at TfL, she is encouraging developers to consider the kinds of travel routes women and girls take, and their feelings of safety on their walks to public transport.³³ The Committee noted the safety audits currently being conducted by TfL and the Mayor's Office for Policing and Crime (MOPAC) in six locations across London to gather data to inform how they design public spaces to improve the safety of women, girls and non-binary people.³⁴

Some members of the Committee raised queries about the lack of car parking in new developments, as well as TfL's developments in station car parks that remove parking spaces,

²⁷ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

²⁸ GLA, <u>Helping London authorities deliver with a Placeshaping Capacity Survey</u>

²⁹ Evidence submitted to the Committee, Tiffany F. Lam, 27 February 2024

³⁰ Evidence submitted to the Committee, Tiffany F. Lam, 27 February 2024

³¹ Planning and Regeneration Committee meeting, 29 February 2024, minutes

³² Planning and Regeneration Committee meeting, 29 February 2024, minutes

³³ Planning and Regeneration Committee meeting, 29 February 2024, minutes

³⁴ Planning and Regeneration Committee meeting, 29 February 2024, minutes

particularly in outer London areas where public transport is less available. This is in view of the safety needs of women and girls, especially those returning home at night, as well as caring responsibilities such as nursery and school runs.

Recommendation 4

TfL should conduct a comprehensive analysis of the data collected from its pilot women's safety audits and publish the outcomes. To enhance safety measures, these audits should be extended to cover the entirety of the TfL network and the surrounding streets. This should include the specific circumstances of local people who may have car parking needs, and different travel needs between inner and outer London.

The London Plan

Sarah Considine informed the Committee that the London Plan policy "does a lot, particularly with regard to the Healthy Streets agenda."³⁵ However, when the London Plan was discussed, the Committee was told that there are risks when plans are too high-level at addressing specific issues. For example, Susannah Walker stated:

"The danger with plans - and it is almost inevitable - is it is really easy to write a highlevel, inclusive plan that says, "Everything is going to be equal for everybody." The real problem is actually getting that enacted in detail. It is in the nitty-gritty detail of writing supplementary planning guidance (SPG), of writing strategies, of evaluating things where that happens." ³⁶

We were told that making explicit reference to gender in policy is essential for planners to build gender-inclusive environments. Marina Milosev informed the Committee that:

"if gender sensitive urban design and planning is not a requirement within the project brief, that is it. We have lost the opportunity. By the time we come to the Committee, by the time we come to the officer, the officer can only do as much as following the policies and the developer would come with an already prepared brief. Their design team is going to be working months before they see the planning officer. So, if it is not built into the brief, it is not going to happen."³⁷

The Committee heard that the GLA's Good Growth by Design team expect the next iteration of the London Plan to build on gender as an issue. Sarah Considine informed the Committee that as part of the Planning for London Programme, there have been engagement exercises with Londoners and with industry experts, to identify what the next iteration should consider and that "there could even be some benefit in bringing together all of the actors that are currently in this space."³⁸

She also informed the Committee that there will be a refresh of the Accessible London Supplementary Planning Guidance (SPG), which will provide an opportunity to unpack a broader range of issues, other than the main focus on mobility issues, that impact access and inclusion on London's built environment.³⁹

³⁵ Planning and Regeneration Committee meeting, 29 February 2024, minutes

³⁶ Planning and Regeneration Committee meeting, 29 February 2024, minutes

³⁷ Planning and Regeneration Committee meeting, 29 February 2024, <u>minutes</u>

³⁸ Planning and Regeneration Committee meeting, 29 February 2024, minutes

³⁹ Planning and Regeneration Committee meeting, 29 February 2024, minutes

Following our investigations this year, the Committee believes more can be done to design and plan with a more intersected lens, so that considerations such as gender, accessibility and crime in the built environment can be considered as part of a more holistic approach.

Recommendation 5

The GLA should ensure the Planning for London programme examines issues including gender, accessibility and crime in the built environment in a holistic fashion. To achieve this, the GLA should ensure its engagement process creates a space in which these issues can be considered alongside one other in an intersecting framework with experts, stakeholders and those with lived experience discussing the issues together.

Recommendation 6

The next London Plan should include policies that make explicit reference to the importance of creating gender-diverse spaces. The GLA should prepare stand-alone guidance on creating gender-diverse spaces.

The Committee would welcome a response to this letter by 31 May 2024. Please address your response to Memuna Hussain, Senior Policy Adviser, at memuna.hussain@london.gov.uk.

Yours sincerely,

Pahiph

Sakina Sheikh AM Chair of the Planning and Regeneration Committee

Planning and Regeneration Committee activity

The Planning and Regeneration Committee held five investigations across the Assembly year of 2023-24.

Architectural design of social housing in London

The Committee held one meeting for this investigation on 12 September 2023. The transcript for the meeting is <u>here</u>. The Committee also conducted a site visit to two Peabody estates, one built in 1871 (Blackfriars Estate) and the other built in 1936 (St John's Hill in Clapham). The investigation explored the architectural development of social housing in London, and its impact on Londoners. Guests at the meeting were:

- John Boughton, Historian and author of *Municipal Dreams: The Rise and Fall of Council Housing*
- Kate Macintosh MBE, Architect and designer of the Dawson's Heights social housing estate in Southwark.
- Christine Wagg, Historian, Peabody Trust
- Charleen Henry, Senior Urban Designer, Greater London Authority (GLA)
- Alice Brownfield, Architect and Director, Peter Barber Architects

London and the 15-minute city

The Committee held one meeting for this investigation on 18 October 2023, which scrutinised the urban planning model of the '15-minute city'. The transcript for the investigation is <u>here</u>. Guests at this meeting were:

- **Catherine Gall**, Executive Director, Chaire Entrepreneurship Territory Innovation (ETI), Sorbonne Business School
- **Dr Enrica Papa**, Associate Professor, Transport Planning and Management, University of Westminster
- Nicholas Boys Smith, Director, Create Streets
- Jonathan Lloyd, Corporate Director of Strategy and Change, Waltham Forest
- Matthew McCartney, Senior Researcher, The Charter Cities Institute
- Stephen Passmore, Head of Knowledge, Future of London

Planning and Accessibility

The Committee held one meeting for this investigation on 28 November 2023, which was split into two panels. At these meetings, the Committee built on its findings of previous work

into the future of planning in London and explored how the planning system can improve accessibility for Londoners, with a specific focus on Disabled people. The transcript for the first panel meeting is <u>here</u>. Guests at the first panel included:

- Laura Vicinanza, Policy and Stakeholder Engagement Manager, Inclusion London
- Fara Muneer, Head of Business Development, Centre for Accessible Environments
- Hallie Banish, Campaigns and Communications Manager, Ruils
- Dr Teri Okoro, Founder and Director, TOCA architects
- Jane Wilmot OBE, Chair, Hammersmith and Fulham Disability Forum Planning Group
- Harriet Bell, Disabled Londoner speaking from personal experience.

The transcript for the second panel meeting is <u>here</u>. Guests at the second panel included:

- Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills
- Lisa Fairmaner, Head of London Plan and Growth Strategies, GLA

Crime and Planning

The Committee held one meeting on 30 January 2024 for this investigation, which was split into two panels. The purpose of this investigation was to establish the Metropolitan Police Service's (MPS) involvement in the built environment and our planning system, particularly in relation to Secured by Design (SBD) principles. The transcript of the first panel meeting is <u>here</u>. Guests at the first panel included:

- Guy Ferguson, Chief Executive Officer, Police Crime Prevention Initiatives (CPI)
- **Dr Elanor Warwick**, Head of Strategic, Policy Evidence and Research at Clarion Housing Group (attended in her capacity as the author of *Defensible space on the move: Mobilisation in English housing policy and practice*).
- Phineas Harper, Opinion Columnist, The Guardian
- Russell Curtis, Founding Director, RCKa Architects
- David Lucy, Designing Out Crime Officer, MPS
- Martin Hubbard, Designing Out Crime Officer, MPS

The transcript for the second panel meeting is <u>here</u>. Guests at the second panel included:

- Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills
- Lisa Fairmaner, Head of London Plan and Growth Strategies, GLA

Gender-informed planning

The Committee held one meeting on 29 February 2024 for this investigation. At this meeting, the Committee examined how women and girls are affected by the design of the built environment. The transcript for the meeting is <u>here</u>. Guests at this meeting were:

- Marina Milosev, Team Leader, London Legacy Development Corporation (LLDC)
- Susannah Walker, Co-founder and Trustee, Make Space for Girls
- Olivia Theocharides-Feldman, Founding Associate, Julia King (JK) & Associates
- Sarah E. Considine, Principal Project Officer, Good Growth by Design, GLA
- Alison Bradshaw, Spatial Planning Area Team Manager (West), Transport for London
- **Tayo Isa-Daniel**, Urban Researcher, Architect and Senior Design Researcher, AtkinsRéalis

We also received written evidence from:

• Tiffany Lam, Policy Lead, Sustrans

Other formats and languages

If you, or someone you know needs this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: 020 7983 4100 or email <u>assembly.translations@london.gov.uk</u>

Chinese

如您需要这份文件的简介的翻译本, 请电话联系我们或按上面所提供的邮寄地址或 Email 与我们联系。

Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Hindi

यदि आपको इस दस्तावेज का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

Turkish

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Punjabi

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Arabic

الحصول على ملخص ل ذا المستند بل غتك، فرجاء الاتصال برقم ال انتف أو الانتصال على العنوان البريدي العادي أو عنوان البريد الإلكتروني أعلاه.

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જોઈતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ૮પાલ અથવા ઈ-મેઈલ સરનામા પર અમારો સંપર્ક કરો.

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