



Campaign to Protect  
Rural England  
LONDON

## ‘Is London Working?’ A consultation paper for the Commission on London Governance

A CPRE London response

March 2005

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## **Introduction**

1. CPRE London welcomes the opportunity to contribute to the review by the Commission on London Governance. CPRE London is an organisation working at the London region level to influence policy and practice through the GLA bodies. Therefore we have direct experience of how London Governance works at that level, which has informed our comments below. CPRE London also has members across London working at the local level. Our comments address two aspects of the consultation paper:

- the effectiveness of partnerships, focussing on Local Strategic Partnerships; and
- the responsibilities of the GLA, focusing on problems with current practice in consultation and transparency.

## **The effectiveness of partnerships**

2. Our comments below relate specifically to Local Strategic Partnerships (LSPs) but the general principles could be applied to all partnerships. The examples we use are drawn from outside London and we leave it to those more closely involved in partnerships within the capital, or those who have studied aspects of London LSPs' work (such as London Sustainability Exchange<sup>1</sup>), to comment on their individual effectiveness.

3. At a local level, the potential for LSPs to contribute to the development and implementation of policy is greatly underdeveloped. While some partnerships are not as effective as had been hoped, others have shown that the model can be one that works well. In particular, LSPs – where well run and constituted and properly resourced – provide a valuable opportunity for promoting the effective engagement of the local community. This is crucial for raising standards and maintaining local political support.

4. However, the reality is that, generally, the public knows little about the LSPs' role or activities, and usually gets little or no opportunity to participate. Despite this, consultation with the LSPs has been used as a proxy for proper public consultation. It has been proposed<sup>2</sup>, for example, that the Thurrock Urban Development Corporation (UDC) will use the local LSP as a representative of community interests. This needs to be supplemented by direct community consultation because the effective reach of LSPs into the community remains very limited.

5. The need to develop mechanisms to better engage the public in decision-making about the future of their areas remains urgent and LSPs could potentially provide a large part of the answer. Helpful lessons about how LSPs may become effective fora for genuinely participative and inclusive decision-making can be drawn from those LSPs that have achieved success already. The Sheffield LSP – *Sheffield First* – is a case in point.

6. In order to ensure public accountability of LSPs, the extent to which member organisations have delivered action identified by the partnership as being necessary to deliver its objectives, and the effectiveness of that action, should be subject to regular review by the partnership. The outcome of such reviews should be made publicly available.

7. With specific regard to the Thames Gateway, as the consultation paper notes, the number of partners involved and complexity of their relationships could be a hindrance to effective progress and can hinder community involvement. CPRE London is recommending to Government that new LSPs should be created in the Thames Gateway where none are already

present and that a review is undertaken of the effectiveness of the LSPs in delivering strategic objectives and facilitating effective public participation. Where LSPs fall short of high standards, resources should be invested in improving them. Of particular importance is that LSP members are widely drawn and include people who are able to articulate environmental and community concerns effectively.

### **The responsibilities of the GLA**

8. The consultation paper asks ‘How can a strategic authority best support the development of local choice and local democracy?’. A key aspect of the GLA’s performance that affects these issues is how the GLA bodies themselves promote accountability, transparency and public participation. Performance on actively engaging stakeholder organisations, and Londoners generally, has frequently been poor. The GLA bodies should lead by example in developing ways of engaging Londoners and London organisations in policy and decision-making. This might encourage similar practices at a local level. Below are some examples of the GLA’s poor practice in consultation and transparency.

9. While CPRE London engaged as fully as possible with the *consultation on the London Economic Development Strategy (EDS) in 2004*, we feel that the process was not conducted in accordance with Government Guidance<sup>3</sup> and that the LDA has not taken forward the lessons learnt at that time by improving their consultation procedures. For example, details of the timetable and structure of the consultation were not published far enough in advance to enable all stakeholder groups to fully engage in the process. A full list of consultation events was not posted on the LDA website or otherwise made available. Attendance at most of the events was by invitation only, which narrowed the possibilities for participation. In several cases the LDA passed on the responsibility for (and cost of) organising stakeholder events to stakeholder organisations rather than managing the process themselves. This is a particular problem for the voluntary and community sector where resources are very limited. We are aware that the LDA undertook this consultation process with a very tight timetable and budget but this should not have prevented them making every effort to fulfil their commitment to improve their engagement with stakeholders<sup>4</sup>. CPRE London was involved in trying to improve the process through dialogue with relevant LDA staff.

10. The failure of the LDA to learn from the EDS review in 2004 was recently demonstrated by the process of developing the *LDA Corporate Plan 2005-8*. The 2004-7 Corporate Plan clearly outlined the timetable for developing the 2005-8 Corporate Plan, which included an opportunity for ‘stakeholder consultation’ in October 2004. CPRE London asked to be informed of the consultation but was sent no information by the LDA. We recently found out that the consultation process, such as it was, had been conducted in October with ‘key stakeholders’ and that the bodies consulted had been given only one month to respond. This precluded most of the umbrella organisations contacted from consulting their members or informing them of the consultation in time for them to take part. Information about the process of updating the Corporate Plan was not posted on the LDA website in the Corporate Plan section or highlighted on the front page. It is not good enough just to have the information on the website in a separate section on consultation that is not linked to the Corporate Plan page or the front page. Ideally, the LDA should use an e-mail alert system, alongside other methods, to keep interested parties informed of their work programmes and consultations.

11. To fully engage with policy and decision making processes, stakeholders need good quality, timely and easily accessible information. They also need to be informed of policy processes and departmental work programmes. In the case of consultations, stakeholders need to be aware of the process timetable well in advance so that they can include it in their own work plans. This information should be made easily and obviously available electronically and on paper. The published timetables for policy processes and consultations should then be adhered to. Not to do so is poor governance. At the moment, it is too often the case that any consultation timetable published by GLA bodies is repeatedly revised, with deadlines for the publication of consultation papers being constantly pushed forward. This has an adverse effect on the

consultation process because consultees have to repeatedly revise their own plans and they cannot pass on reliable information about the process to their members. Also, it can generate a negative attitude to the consultation before a paper is even published and, in the worst case, consultees may disengage from the process completely. Two examples of problems with consultation slippage follow.

12. Following the publication of the London Plan in February 2004, timetables were given for the production of *Supplementary Planning Guidance (SPG) on a range of subjects, Sub Regional Development Frameworks (SRDFs) for the five London sub regions and for a full review of the London Plan*. A year on, most of the SPGs have yet to be published for consultation. The timetable for SPG production given on the Mayor's website originally gave specific months for publication of each SPG document. However, as the timetable for producing these documents has slipped over the last year the website has been updated and it now gives only indicative timings such as 'spring 2005'. The failure of the Mayor's staff to keep to the original timetable for consultation and current vagueness over dates of publication makes it very difficult to engage constructively in this process.

13. As with the SPGs, the timetable for consultation on the five Sub Regional Development Frameworks originally scheduled them for completion by the end of 2004. Initially, public consultation on the SRDFs was put back to autumn 2004, then to the end of 2004, then to January/February 2005. This is now scheduled for March/April 2005 and likely to be disrupted by the General Election. Seminars on the SRDF process have been held by the Mayor's spatial planning staff to attempt to engage some level of participation in the process by the voluntary sector but these have largely been attended by pan-London organisations, such as CPRE London, and umbrella bodies. Attempts by the umbrella bodies and ourselves to broaden the participation out to groups working in the sub-regions have not been fully supported by the Mayor's staff. They appear to be reluctant to take up suggestions for widening the field of consultees or offers of help with the process from some of the pan-London umbrella bodies. Attempts by the umbrella bodies and ourselves to engage our members in the process have been hindered by the continuing uncertainty over timing. As stated above (paragraph 11), to fully engage with policy and decision making processes, stakeholders need good quality, timely and easily accessible information.

14. Any organisation undertaking a consultation process should take ownership of dissemination of information about that process. It should keep an up to date contact list of interested parties and not rely solely on umbrella groups or other organisations to pass on information although, this is a valuable method of widening participation. GLA bodies tend to focus their consultations on umbrella groups and organisations already known to them but should make more effort to reach out more widely.

15. The GLA is lacking in transparency and difficult to engage with. Contact details for particular issues are not included as a matter of course on the GLA bodies' websites (as they are on the Government Office for London site), the public information office are often unable to help with inquiries (as they are not kept fully informed of publications and consultations themselves) and the search facilities on the GLA websites are poor. The GLA's current problems with transparency, accountability and public involvement must be addressed as a matter of urgency.

CPRE  
March 2005

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<sup>1</sup> *Local Strategic Partnerships and the Delivery of Sustainable Development in London Boroughs*, London Sustainability Exchange, London 21 and London Environmental Coordinators Forum, January 2005.

<sup>2</sup> Thurrock Council officers and representatives of the Board of the Thurrock UDC have made this proposal.

<sup>3</sup> Annex F, *Supplementary Guidance for the Regional Development Agencies in relation to the Regional Economic Strategies* (issued by DETR in 1999).

<sup>4</sup> Page 1, *London Development Agency Corporate Plan 2004-7*, LDA, 2004.