

**The Greater London Authority  
- Problems of Strategy Co-ordination**

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## Abstract

The Act which established the Greater London Authority incorporated many of New Labour's aspirations for modern governance. Among those aspirations was the notion of policy integration, or 'joining-up'. The Mayor of Greater London was required to develop a number of strategies, broadly in the planning and environmental policy domains, and to ensure that those strategies meshed into a coherent strategy for promoting London's economic, social and environmental well being. How would this work in practice, given the need for coordination between the GLA and a number of related functional bodies, and given the political imperative for the GLA to make an impact quickly? Through our analysis of the strategy development and integration efforts of the GLA in its first nine months, we have gleaned new insights into the highly complex and difficult process of policy integration. We argue that the high aspirations of the Act for policy integration have not been met, policy integration instead being narrowly interpreted as the coordination of strategies to the Mayor's political agenda. Finally, we reflect on the likelihood of the GLA, as currently constituted, evolving to meet the functional requirement of policy integration.

## 1. Introduction

Reforming local government has been a high priority for the New Labour government. On election in 1997, it arrived with an ambitious policy agenda in that area, summarised in the 1998 White Paper *Modern Local Government: In Touch with the People*. The new agenda included the restructuring of political processes to make them more accessible, inclusive and transparent. Improving policy cohesion throughout government, or ‘joining up’, was another key aspect of New Labour’s public-sector reform agenda (Rhodes 2000). The theme is clearly present in the Greater London Authority project, which was to create a new strategic body for London that would bring back the policy cohesion that many felt was lacking during the interregnum since the disbanding of the GLC (Newman and Thornley, 1997 and Dowding *et al.*, 2000).

The Greater London Authority Act 1999, which established the Greater London Authority, built the logic of ‘joining-up’ into the institutional design of this new strategic authority. As deputy mayor Nicky Gavron put it: “The GLA has integration written through it like Brighton through rock.”<sup>1</sup> The GLA was the first local authority to be given the duty to promote economic, social and environmental well-being in its area (the so-called “Three E’s”: economy, equality and environment), and to promote sustainable development, equality of opportunity and the health of its citizens. The Local Government Act 2000 extended these duties to other local authorities. The Act required the GLA to produce a series of strategies (dealing with transport, culture, spatial development, economic development, air quality, biodiversity, waste and noise), which had to be mutually consistent and reinforcing. The GLA had a statutory duty to consult relevant stakeholders in drawing up each of the strategies (GLA Act, part I, section 32). The Act also set up the Greater London Assembly, with 25 members, to scrutinise the Mayor’s strategies and decisions, and this scrutiny would include assessing their integration and coherence. As Dilys Hill said, “London is leading the way in changes to local democracy. The lessons that can be drawn from it will have a major influence on the rest of the system” (2000, p.199). Noting Rhodes (2000) observation that “[c]o-ordination is the philosopher’s stone of modern government, ever sought, but always just beyond reach”, we viewed the GLA as a seminal opportunity to study policy development and integration in practice, particularly given that it is a new political organisation for which policy integration is a statutory duty.

The literature on joining-up, or policy integration, is only now beginning to emerge<sup>2</sup>, although as Thomas (2001, p.5) points out the concept of joined-up government to a large extent only “re-visits familiar concerns about the ways in which sectoral policies can fail to mesh”. He argues that even where policies manage to join up operationally, there may still be no consensus on the ‘underlying rationale’ for those policies. Stewart and Goss *et al* (1999), in a study of five so-called cross-cutting issues<sup>3</sup> affecting local government,

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<sup>1</sup> Nicky Gavron, presentation to the London Development Agency public consultation conference, 7<sup>th</sup> February 2001.

<sup>2</sup> See Perri 6, Leat, Seltzer, Stoker (forthcoming 2002).

<sup>3</sup> Cross-cutting issues are those that run through a range of sectoral policy areas. Implementation of cross cutting policy is achieved through the co-ordination of sectoral policy. The issues studied by Stewart and

found that a significant problem for the implementation of cross-cutting policy was the lack of unambiguous definition of either the problem or the outcome. They note: “There is little agreement about cause and effect and therefore about ‘what works’ – and, in particular, what preventative measures may be effective, or what the balance should be between alleviation of current symptoms and longer term measures” (ibid, p. 6). They also identify a number of organisational and cultural features that inhibit the implementation of cross-cutting policy, and recommend ways in which a virtuous cycle of interaction between organisational structure and organisational culture and behaviour can be established to enhance joint working towards implementation. They believe that effective consultation with local communities, the voluntary sector and business is an important feature of the joining-up process (ibid, p. 9).

For Thomas (2000) there are three aspects of policy integration:

- (i) inter-agency consistency/integration;
- (ii) integration of formerly separate policy sectors;
- (iii) increased citizen involvement as a means of pushing “policy makers to recognise the need to break down, or at least ameliorate the significance of, divisions between policy fields, and the agencies responsible for them.” (ibid, p.5)

The time frame of our research only permitted us to explore the first two of these aspects of integration. While the GLA was actively engaged in developing citizen consultation exercises, their impact on strategy development and integration was not observable during the period of our research which was from July 2000 when the GLA began functioning to March 2001. We examined, through documentary analysis, observation and interviews with key actors, the process (or, more accurately, processes) of integration of seven of the eight required strategies, focusing on those within the planning and environment area (that is, the strategies dealing with spatial development, economic development, transport, air quality, biodiversity, waste management and ambient noise), although draft strategies for noise and waste were not produced during our research period. How would this political institution, with its directly-elected executive Mayor and a statutory duty to integrate policy, actually achieve integration? Was there one single, agreed process of strategy integration or were there several? If there were several, from where did they emanate? What were the integration mechanisms deployed? Where would final strategy integration take place?

The paper begins by outlining the three loci of policy integration within the core GLA (the Mayor’s Office, the bureaucracy and the Assembly). It then examines how the GLA Act envisaged policy integration and considers how this was interpreted within the core GLA. It then goes on to consider some of the integration mechanisms in use in the core GLA during the research period, including the role of the Assembly. Finally, we summarise our findings and reflect on the future of policy integration in the GLA.

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Goss *et al* were community safety, disaffected youth, regeneration, social exclusion and sustainable development.

## 2. Three loci of integration within the core GLA

Our research has focused on the three centres of power with an interest in strategy integration: the Mayor (and Mayor's Office), the Assembly, and the bureaucracy. How did they try to integrate the various strategies, as the Act required? A distinction must be made between the "core GLA", made up of the Mayor, Assembly, and approximately 250 officers, mostly absorbed from pre-existing London-wide bodies; and the "functional bodies"<sup>4</sup>, for which the Mayor acquired some responsibility but which continued to operate as separate organisations. Two of the functional bodies had an interest in strategy integration in the environment and planning domains: Transport for London (TfL) because of its responsibility for the Transport Strategy and the London Development Agency (LDA), to which the Mayor accorded responsibility for developing the Economic Development Strategy (a fact which posed considerable problems for the GLA bureaucracy in terms of integration). Our research focused on the core GLA and its efforts to integrate the strategies; we did not study the process from the perspective of the functional bodies.

### 2.1 *The Mayor and his office*

The Act gave the Mayor far-reaching executive power, but its architects did not foresee that the first Mayor (one without the support of a party machine) would create a large personal office in order to control the GLA bureaucracy. Section 67 of the Act provided for a personal office made up of two senior political advisors, who would be personally chosen by the Mayor and did not have to go through a formal selection procedure, and ten other members of staff. However, Ken Livingstone struck a deal with the Assembly<sup>5</sup> to greatly expand this. The Mayor's Office now has about 30 staff, many of whom are long-time assistants who worked in his campaign team. Their touchstone is the Mayor's election manifesto and their paramount objective to get him re-elected.

What then were the Mayor's political priorities? During our research period he leaned heavily towards transport: congestion charging (introducing a fee—probably £5—for drivers entering central London) and short- to medium-term public transport improvement, including the improvement of the London Underground system. This political focus on transport meant that as far as the Mayor was concerned the Transport Strategy was central. It would be simplistic to suggest that the Mayor was only interested in the short term: he clearly saw the improvement of London's ailing public transport system as a key step to improving London's environment and economy in the longer term. To take on a policy like congestion charging in the first Mayoral term perhaps illustrates this longer term concern. His strategy, in the immediate term was, however, to focus on achieving a narrow set of objectives. Several interviewees observed that the Mayor effectively had two agendas: one covering short-term operational goals, which we call his central agenda, and a peripheral 'Big Tent' agenda, covering much wider ground,

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<sup>4</sup> The functional bodies were the Metropolitan Police, the London Development Agency, the London Fire and Emergency Planning Authority, and Transport for London.

<sup>5</sup> In exchange, the Assembly was given the right to hire dedicated political staff, which the Act did not provide for.

through which he attempted to maintain a broad coalition of support. This agenda included goals such as improving the environment, securing affordable housing and delivering an “urban renaissance”<sup>6</sup>. Underlying both the central and the Big Tent agendas was Livingstone’s long-term goal of drawing down more resources and strategic power from central government. London’s status as a ‘world city’ also emerged as an important theme during the course of our research.

Work that contributed to achieving the central agenda was very tightly managed by Livingstone’s senior personal staff, while the Big Tent agenda was delegated to others in the organisation. For example, Darren Johnson (leader of the Green Group in the Assembly and the Mayor’s cabinet advisor on the environment) handled liaison with environmental groups, while Nicky Gavron, deputy Mayor and Labour Assembly member, was the Mayor’s advisor on the Spatial Development Strategy (SDS). These advisors were essentially left to manage these secondary policy areas, while the Mayor’s personal staff were deployed on congestion charging, the operation of TfL, and winning the argument with central government over the financing of London Underground<sup>7</sup>. The Strategy Directorate also was left to develop policy for areas that were not of immediate concern to the Mayor, except for the waste strategy, in which the Mayor’s personal environment advisor took a close and active interest.

## 2.2 *The Strategy Directorate*

In the early days at least, the Mayor seemed happy to allow the Strategy Directorate to do what its name implied: develop strategy. The directorate was headed by an interim appointee with little experience of London. Most of the directorate’s staff at that time came from pre-existing London organisations absorbed into the GLA, each of which had its own history, legitimacy, problem definitions and visions. These did not necessarily coincide with those of the Mayor. Staff from three organisations joined the Strategy Directorate<sup>8</sup>: the London Planning Advisory Committee (LPAC), the London Ecology Unit (LEU) and the London Research Centre (LRC). Staff from LPAC and LEU were pivotal in writing the spatial development, transport and environmental strategies.

Martin Simmons, formerly chief planner of LPAC, was originally responsible for the transport and spatial development strategies, and sought to liaise with the London Development Agency over the Economic Development Strategy. LPAC, a committee made up of one elected member from each London borough, was established after the abolition of the GLC to draft strategic planning advice for London. It had its own very clear and longstanding views about strategy integration. It was widely regarded as a

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<sup>6</sup> From *Towards an Urban Renaissance* (2000), the report of the Urban Task Force chaired by Lord Richard Rogers.

<sup>7</sup> The government was committed to the introduction of Public-Private Partnership (PPP) for London Underground, under which private companies would become responsible for maintenance and management of some parts of the system’s infrastructure, while Ken Livingstone insisted that all parts of the system should remain under unified (public) management.

<sup>8</sup> Not all members of the strategy team came from these three bodies: there were also some secondees and former civil servants from the Government Office for London and DETR, as well as former employees of other local authorities.

successful cross-party committee, which tried to fill the strategic planning vacuum left by the disbandment of the GLC. Most decisions were taken by consensus. LPAC lobbied central government on London's strategic planning issues and offered planning advice to the boroughs, and was itself a strong advocate of a new strategic London authority. It had already written a strategic-planning blueprint (the *Endowment to the Mayor*) to hand to the Mayor on arrival in office. The *Endowment* was an attempt to integrate "land use with transport, regeneration, economic and social policy and environmental matters" (LPAC, 2000), based on the European Spatial Development Perspective. So LPAC staff already had a "joined-up" approach on arrival at the GLA, and hoped to implement it, and indeed pioneer it, in London. But they were accustomed to working in an environment of political consensus, not one in which a new Mayor wanted to stamp his personal mark on London.

The environmental strategies were headed by David Goode, former director of the London Ecology Unit and expert on sustainable development. The London Ecology Unit was originally a small office within the GLC, which survived after abolition as a separate organisation giving advice to London boroughs on forward planning for nature conservation. Borough membership was voluntary, but the majority joined. LEU's most significant achievement was the establishment, in co-operation with the boroughs, of a hierarchy of 1,300 nature-conservation sites totalling 28,000 h.a. - 17% of London's land area. Twelve employees of the London Ecology Unit were absorbed into the Strategy Directorate, providing a body of ecologists and environmental scientists to work on the environmental strategies and develop the theme of sustainable development.

In addition to developing the various strategies, the Strategy Directorate had direct responsibility for strategy integration. It was initially thought that three so-called cross-cutting themes identified in the Act (sustainability, health and equalities) would provide a way to integrate the strategies. (The Mayor has since introduced other cross-cutting themes such as e- London, young Londoners and older Londoners<sup>9</sup>). One (relatively junior) strategy-directorate officer was responsible for each of the three themes. Line management of these officers was complex. In practice the sustainability officer reported to David Goode, who had overall responsibility for the environmental strategies, while the other cross-cutting officers reported directly to the head of the Strategy Directorate.

The Mayor's Office, whose staff was dynamic and able but managerially inexperienced, failed to marshal the considerable expertise of the strategy team behind its own political vision. Staff in the Mayor's Office concentrated primarily on transport and congestion charging, while officers in the strategy team were tasked with statutory responsibilities, and sometimes found their work peripheral or ignored.

It was not only leadership that was lacking. The strategy team's activity should have been co-ordinated by its head, who reported to the GLA chief executive. But in the GLA's early months its staff, coming from three organisations with strong institutional legacies and cultures, had not yet melded into a seamless new unit. Perhaps inevitably,

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<sup>9</sup> The Mayor has also required appraisal of strategies for their impact on the business community, which essentially makes business-friendliness another cross-cutting theme.

various groups within the strategy team tried to co-ordinate strategies in different and often overlapping ways.

### 2.3 *The Assembly*

The Assembly comprised 25 elected members, 14 of whom represented geographical constituencies and 11 of whom were elected from a London-wide list. When the government consulted on proposals for the GLA, most commentators argued that the role of the Assembly was anomalous. Indeed neither the White Paper nor the legislation gave the Assembly much to do beyond a poorly-defined scrutiny role and an annual vote on the Mayor's budget (where a substantial majority was required to veto the Mayor's plans). Power was clearly vested in the Mayor, in the first instance, not the Assembly.

In the event, a number of well-known and well-connected people from the three main parties were elected to the Assembly along with three new and enthusiastic Green members. Such an Assembly was unlikely to accept a back-stop scrutiny role. The Assembly members, like the Mayor, would have to stand for re-election in 2004 and wanted to make a mark with the public. They actively searched for work, reinterpreting scrutiny to include 'pre-scrutiny' of Mayoral proposals before they were fully developed and implemented. Pre-scrutiny and investigation of mayoral proposals were generally carried out by five- to six-person *ad hoc* investigative committees. They, and the standing Assembly committees<sup>10</sup>, fed back to the plenary Assembly, which met with the Mayor ten times a year. The Mayor was required to submit both oral and written responses to questions raised by the plenary Assembly.

Having outlined the essential attributes of the three power centres, we now consider in detail how the GLA Act defined the duty to co-ordinate policy and how the Mayor, Assembly, and bureaucracy interpreted that duty.

## 3. **Policy integration in the GLA Act**

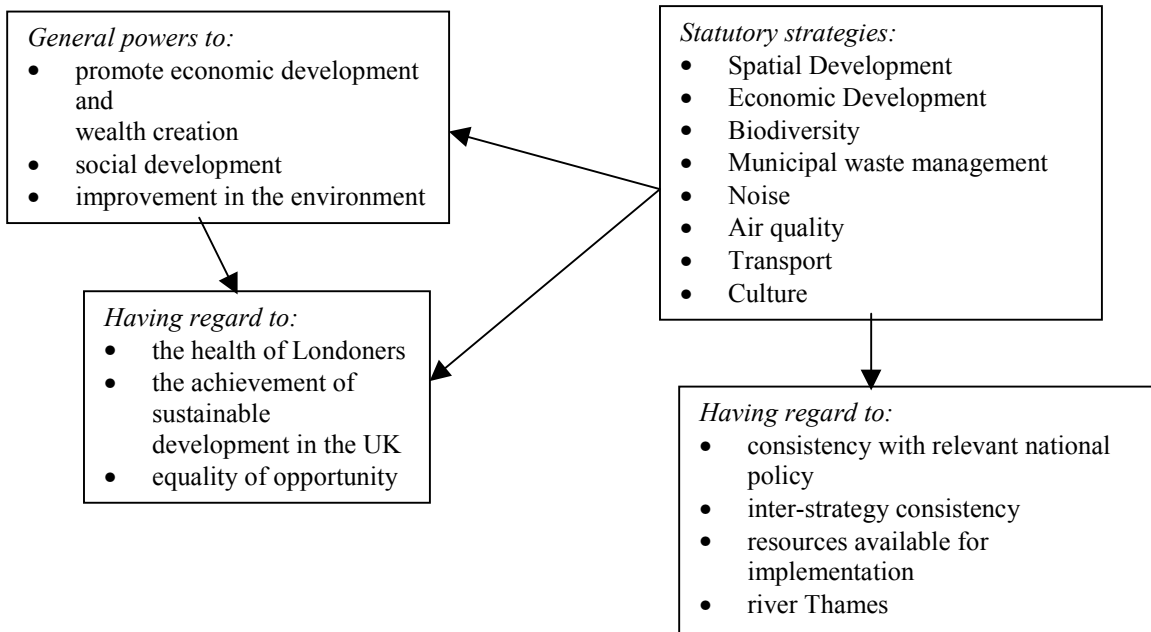
The powers afforded the GLA by the GLA Act were strategic in nature. The Authority - and specifically the Mayor - was required to publish eight "strategies", which should themselves be mutually consistent and reinforcing, and in line with any relevant national policy (section 41). Additional strategies not required by the Act, such as those covering energy, housing and homelessness, were also being developed at the Mayor's instigation. In the GLA Act's provisions regarding the Mayoral strategies certain aspects were open to interpretation. Of particular relevance is the lack of consideration of the relative importance of the individual strategies. The GLA's three power centres each interpreted the Act differently, and these interpretations informed their approaches to strategy co-ordination.

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<sup>10</sup> There are eight standing committees (some of which rarely meet): Transport and Spatial Development Policy; Environment; Planning; Appointments; Budget; Economic Development; Standards; and Standing Orders.



Figure 1: Policy integration as envisaged in the GLA Act



It was unclear whether all strategies were equally important. This was crucial because the importance of each strategy determined how much time and resources were devoted to developing it; its timing; and, in the event of conflict between two strategies, which one took priority. We identified five views regarding the importance of the strategies:

(i) *Political significance of the strategies*

The Mayor and his office, unsurprisingly, ranked the strategies by their political significance. Unlike the bureaucracy, the Mayor’s Office did not regard the strategies as important *per se*—they were important only insofar as they advanced the Mayor’s agenda. As one observer within the GLA said, for the Mayor’s Office “strategies are just one of the means of delivering the Mayor’s manifesto. They are not the be-all and end-all.”

During the first nine months, the Transport Strategy was regarded as pre-eminent by the Mayor and his office because transport was *the* political priority. The Mayor insisted that the draft Transport Strategy be published quickly (it was one of the earliest strategies to emerge, in January 2000—the draft Economic Development Strategy was published earlier, but was not written by core GLA staff) because he had made a manifesto commitment to “consult widely about the best possible congestion charge scheme”, which he was keen to implement as quickly as possible. The Mayor’s Office initially saw the Transport Strategy as the one to which all subsequent strategies must be coordinated.

(ii) *Degree to which GLA can implement strategies*

Closely related to political significance was the question of how much power the GLA had over each policy area—obviously political debate and decision-making would centre on the areas where the GLA could act. The Transport Strategy was most important to the Mayor and his office because of its political sensitivity—and it was politically sensitive because it was an area where the Mayor could make real changes. The Mayor himself saw this clearly—he told the Assembly’s Investigative Committee on the Environmental Strategies that his primary focus was on strategies over which he had financial and operational control<sup>11</sup>. In an interview in November 2000 we asked why there was such emphasis on transport; he replied

“That’s the only area where I’ve got real power, in everything else it’s marginal. Where is there real power? Transport, SDS, influence over the police and fire and the LDA--the LDA in fact is minuscule--and then everything else .... There will be quite an impact on waste eventually but nothing else is in that league. In the transport sphere, so long as Government continues to give me the money and cooperate with congestion charging, I’ve got the ability to turn it around.”

While the GLA’s ability to implement the strategies was of great interest to the Mayor’s Office, it was a political factor to which the Act paid only scant attention. In Section 41 the Mayor was required to have regard to the resources available for the implementation of each strategy in preparing or revising it, but there was otherwise no recognition of the implications resulting from the fact that some of the strategies concern areas over which the GLA had little influence.

Figure 2 classifies the strategies according to how much power the GLA had to implement them. Some of the strategies dealt with matters over which the GLA had operational control, but most covered areas where the GLA’s involvement was confined to persuasion and partnership. The GLA had direct operational power over transport through Transport for London. Through the Spatial Development Strategy (the SDS—to be known as The London Plan), the GLA could exercise significant control over borough Unitary Development Plans (UDPs), which must conform to the strategic plan expressed in the SDS. The SDS also would provide the framework for to the Mayor’s decisions about strategic planning applications (all planning applications for developments of over a certain size, or which breached UDP guidelines, were automatically referred by boroughs to the Mayor). With regard to economic development, one of the GLA functional bodies, the London Development Agency, had very limited direct operational power through its property holdings, and would also be responsible for distributing Single Regeneration Budget (SRB) funds in London. Most of the elements of the Economic Development Strategy, however, required action by the private sector or other public-sector bodies. The four statutory environmental strategies must be reinforced through the transport, spatial development and economic development strategies, but ultimately require actions by other actors which the GLA is not able to compel. The GLA does have certain highly circumscribed powers to direct London waste authorities.

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<sup>11</sup> Minutes of Investigative Committee on Environment Strategies, 13 March 2001.

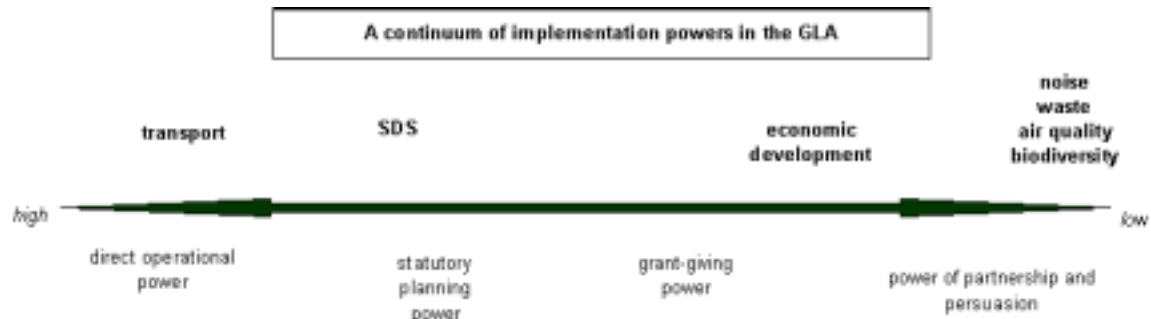


Figure 2

*(iii) Legal status of the strategies*

Closely allied to the question of the implementability of the strategies was the question of their legal status. The GLA was required to produce eight strategies, but the only one that would have defined statutory force was the SDS, which would replace regional planning guidance for London (currently contained in Regional Planning Guidance 3). All borough unitary development plans would be required to conform with the SDS once it had undergone formal Examination in Public (EIP), a process not required of any of the other strategies. Officers working on the planning and development strategies together with the deputy Mayor insisted that this demonstrated the legal superiority of the SDS, and argued that they needed more staff and time to ensure that the document fulfilled its complex statutory functions; the Mayor was, in the early days, deaf to this plea.

*(iv) Integrating capacity of the strategies*

The SDS had a clear integrating function. The Act (Section 334) required the SDS to express the spatial development aspects of all the Mayoral strategies, while Government Office for London guidance on planning in London (GOL circular, June 2000) stated: “The SDS offers the opportunity for an integrated approach to shaping the future pattern and direction of development in London. It should provide a common spatial framework for all the Mayor’s strategies and policies, as well as for the land use policies in UDPs.” GLA planning officers emphasised the integrating function of the SDS, arguing that other Mayoral strategies should be merely provisional pending its development.

*(v) All strategies are equal.*

The last possibility was to interpret the Act narrowly and regard all strategies as of equal importance. This appeared to be the view of those officers responsible for developing the environmental strategies. They argued against the prevailing view in the bureaucracy (above) that the environmental strategies were less important than those dealing with planning. The Assembly did not appear to have a united view of the relative importance of the strategies. Assembly members tended to give primary focus to the strategy covered by the committee they served.

While there were a number of views within the core GLA regarding the relative importance of the strategies, their political significance and implementability were the Mayor’s main concerns during early strategy development. The Transport Strategy set the pace of strategy development in general, and in cases of conflict was regarded by the Mayor and his office as preeminent.

We will now look at some of the specific mechanisms that were been deployed in the early attempts to integrate the statutory Mayoral strategies.

#### 4. Integration mechanisms in practice: the GLA bureaucracy and the Mayor’s Office

A number of integration mechanisms were deployed in the first six months of the GLA. Broadly they fell into three categories: a) technical exercises in co-ordination to ensure that gross inconsistencies between strategies were smoothed out and that strategies did not overtly undermine the longer-term goals of improving the health of Londoners, equality of opportunity and contributing towards sustainable development in the UK; b) attempts to produce a long-term and overarching vision for the GLA to which all strategies could be integrated, thus addressing the Act’s requirements to balance the GLA’s three principal purposes; and c) joining up the strategies to the Mayor’s specific, short-term priorities.

##### a) Technical joining-up

The GLA bureaucracy carried out two essentially politically neutral and technical exercises: one of checking the strategies against each other, and one of checking strategies against the cross-cutting themes. These were aimed at fulfilling the statutory requirement for consistency amongst the strategies, particularly those with close linkages (for example transport and air quality), and at ensuring that strategies did not undermine efforts to promote sustainable development, equality and the health of Londoners. These we have termed ‘mutual checking’ and ‘cross-cutting themes appraisal’.

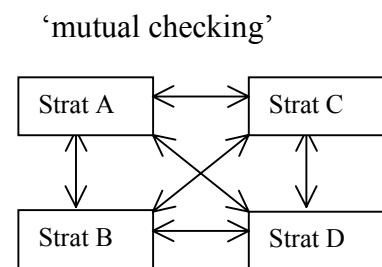


Figure 3

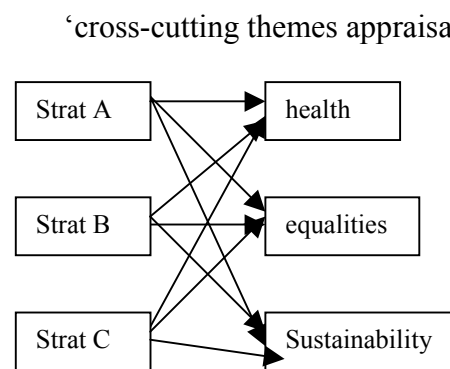


Figure 4

Surprisingly, given the statutory requirement to make the strategies consistent, there appeared to be only one official forum in which strategy officers could consider the development of strategies other than their own. This was a monthly forum for strategy officers in the bureaucracy to update other strategy officers on their strategies and identify gross inconsistencies. Strategy integration thus became more *ex post facto* ‘cutting and pasting’ than genuine co-development of strategies. Many observers felt that the initial frenetic pace of strategy development, a pace determined by the Mayor’s insistence on producing an early Transport Strategy, forced officers to focus narrowly and exclusively on their own strategies.

In the cross-cutting themes appraisal, the three “cross-cutting themes officers” (responsible for health, equalities and sustainability) examined each emerging strategy and interviewed the strategy officer responsible for its development. Our research focused on sustainability as a cross-cutting theme but at the time of writing little sustainability appraisal had been undertaken. The resources and staff allocated to the task allowed only a cursory examination of each draft strategy—in fact, officers only had time to comment on strategies during the final stages of drafting. They also were often unable to keep track of whether their comments had been addressed, particularly since the strategies were the subject of continual revision as they neared completion.

b) *(Not) producing a “vision” (balancing the Three Es)*

The Act gave the GLA three principal purposes: to secure economic and social development, and to improve the environment. The Act also said that when working towards one of these goals, the GLA had also to consider the impact of its actions on the other two. Over time the GLA was meant “to secure a reasonable balance” between them (GLA Act, 1999, Sections 30-34) (see Figure 1). Where and how that balance would be struck was clearly a political choice. One way to try to achieve this “balance” would have been through an explicit statement of the Mayor’s objectives in these areas - a “vision” document - to guide the strategies. One internal strategy-integration paper, dated September 2000 stated: “Our vision should comprise: a healthy economy; a good quality of life; a sustainable future; and equality of opportunity.” This, it was argued, should be accompanied by a set of overarching objectives. While officers recognised that to some extent the ‘vision’ and ‘objectives’ were already set out in the Mayor’s manifesto, published in early 2000, and the State of London report, published in August 2000, they felt they needed a more detailed vision for London for the next ten years in order to ‘inform strategy development’. It seemed that they wouldn’t have to wait long—the Mayor had announced to his advisory cabinet in June that he would publish a “Prospectus” in November 2000. However, in the event the Prospectus was never published—the Mayor told us that his team had been too busy fighting the battle on tube funding.

Early in his Mayoralty, Ken Livingstone established commissions, comprised of invited experts, to look at housing, equalities, culture, the environment and spatial development. The intention was that these commissions would come up with ambitious, ‘blue skies’ goals for the GLA. Their reports, together with the results of more general public consultation, would then inform the development of the Mayor’s Prospectus. The

commissions met and usually produced reports, even though the Mayor's Prospectus never materialised.

We were able to follow closely the work of the environment and spatial development commissions. The selection of experts, general organisation, and definition of the work programmes were delegated to the Mayor's cabinet advisors, Darren Johnson (environment) and Nicky Gavron (spatial development). They in turn worked closely with senior officers Martin Simmons and David Goode. Former employees of LPAC and the LEU thus had a strong presence and influence over the commissions. Initially, this served to bolster the legitimacy of the officers and cabinet advisors concerned, but in fact with the cancellation of the Mayor's Prospectus, there was never a medium through which to channel the output of the commissions.

Without a clear Mayoral vision to direct the strategies, strategy officers worked from their own assumptions about the best way of integrating the Three E's. We identified two co-ordination modes, 'mapping onto' and 'drawing down and amplifying', which reflected different views about how to balance the Three E's. Both of these modes proved controversial.

### *Mapping onto the SDS*

The first of these controversial modes we have termed 'mapping onto'. In this mode, strategies were to be mapped onto, or made consistent with, a master strategy. This mode of co-ordination was evident in planning officers' attempts to bring the transport and economic development strategies (which they regarded as shorter term and essentially operational in character) into line with their work on the SDS (the long term integrating strategy). As noted above, the SDS was initially developed by former LPAC staff, who arrived in the GLA with a very clear agenda as regards spatial development. From the outset they viewed the SDS as the overarching and linking strategy, which would itself represent a vision of how the Three Es should be balanced. LPAC's *Endowment to the Mayor*, a report developed by officers and politicians says: "The new Spatial Development Strategy will take a broad, holistic approach to London's future, integrating land use with transport, regeneration, economic and social policy and environmental matters. Its perspective is the Capital's development geography, looking across the whole face (or space!) of London."<sup>12</sup> The *Endowment* offers advice to the Mayor on planning for housing, town centres, and sustainability, as well as advice on inter-regional and European collaboration. LPAC officers, when drafting the *Endowment*, clearly expected the SDS to be the principal Mayoral strategy (or blueprint) with which the rest would have to conform.

In the summer of 2000, the SDS team started work on a mechanism to try to ensure the full integration of spatial development, economic development and transport strategies in order that investment could begin to be dispersed away from the centre of London to inner- and outer-suburban London through increased transport accessibility. This

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<sup>12</sup> LPAC, *Endowment to the Mayor*, p. XX.

mechanism, known as the Pan London Development project<sup>13</sup>, would essentially function as the co-ordinating blueprint until the SDS was published. The project was, however, eventually abandoned as the Strategy Directorate's lack of leverage over the transport and economic development strategies and the increasing control of the Mayor's office over all strategies became apparent. The draft Economic Development Strategy was developed hastily and the Strategy Directorate was given little opportunity to join it with the spatial development and transport strategies. The draft strategy was drawn up piecemeal, largely by external consultants working to an LDA brief; there was almost no input from the core GLA, and the draft was accepted almost without change by the Mayor's Office. Ken Livingstone said to us (in juxtaposition of the transport strategy, which the Mayor's Office had re-written after the Strategy Directorate had attempted a draft), "...look at the economic strategy coming from the LDA. It's great because it's been drawn up by all these people who are running real businesses."

The early drafting of the SDS proposals<sup>14</sup> was left to the Strategy Directorate in collaboration with Nicky Gavron, the deputy Mayor and Ken Livingstone's cabinet advisor on the SDS. Prior to election as Assembly member, Ms Gavron was chair of LPAC and on arrival in the GLA continued to play a prominent role as political champion of the new approach to spatial planning, an approach, termed "the London of interchanges", developed by Sir Peter Hall, which would concentrate development around public transport interchanges, linking inner and outer London through a new orbital rail system. Ken Livingstone was apparently happy to let her do so. The first draft SDS proposals were scheduled to be published in January 2001, but did not in fact appear until May 2001. Not until just before the initial publication date did the Mayor's Office start to take a close interest in the strategy. Staff of the Mayor's Office felt the SDS proposals did not sufficiently relate to the Mayor's political priorities and did not promote London as a World City, while the primary concern of the strategy officers had been to establish a watertight legal document that would withstand any challenge at public examination. Soon the strategy team was marginalised as the Mayor's Office, together with its specially appointed consultants, took control and orchestrated the process of preparing a new draft.

The non-statutory discussion document - policy directions, for the Spatial Development Strategy, now more accessibly entitled *Towards the London Plan* - were finally published at the beginning of May 2001. Although, the publication of the proposals was strictly outside of the timetable of our research, we could not ignore what was meant to be the statutory integrating strategy.

The SDS proposals document, had come to be the official expression of the Mayor's vision. Superficially the document spoke to a vision that balances the GLA's three principal purposes, as the Act required. This was encompassed in catch-all notion of "London as an exemplary sustainable world city". Those goals mentioned in the draft

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<sup>13</sup> Report XX, Agenda of Mayor's Advisory Cabinet, 18 July 2000.

<sup>14</sup> The SDS must undergo a long statutory process. Mayor Livingstone took an additional step, not required by law, of publishing a set of proposals preceding the draft consultation SDS. These proposals, *Towards a London Plan*, appeared in May 2001.

biodiversity and air quality strategies were also set out in *Towards the London Plan* – “creating a prosperous city”; “ensuring an accessible city”; “promoting a green city”; “creating a city for people”, as well as the additional theme of “increasing the supply of housing”. However, in some important respects social equity and the environment seemed subordinate to, rather than balanced with, economic development. The very beginning of the document set out the “context, challenges and vision” for the London Plan and very starkly presented “London’s fundamental strategic choice”, which was either to revert to a policy of dispersing London’s population and economic activity away from the centre, or to accept and even promote the concentration of development in the centre. *The* central principle set out in document was that of maintaining and enhancing London’s world-city status in the face of potential attempts by other European cities (specifically Berlin and Paris) to usurp London’s status.

During one meeting of the Assembly’s investigative committee on the SDS, at which they discussed the proposals document with the Mayor and his advisors, certain members of the Mayor’s team said that the Economic Development Strategy and the Transport Strategy would eventually be revised on completion of the final SDS. It would appear, then, that the SDS will come to be the essential template for joining up the Mayoral strategies. What is less certain, however, is the fate of the work of the Strategy Directorate and the deputy Mayor as the Mayor’s own template becomes clearer. Already it would appear that LPAC/Gavron vision of linking the three principal purposes through ‘the London of interchanges’ has been subordinated to the Mayor’s vision of London as premier European world city.

#### *Drawing down the sustainability principles*

The second of the controversial co-ordination modes, which we have called “drawing down and amplifying”, was evident in attempts by ex-LEU and other officers to get the Mayor to adopt a schedule of “sustainable development principles” as the overall GLA policy template. Here there was no master strategy, but rather a set of master principles. They wanted to co-ordinate strategies by bringing all the statutory strategies into conformity with this list of criteria. Their integration activity was a more ambitious and sophisticated attempt to promote sustainability in GLA policies than the sustainability appraisal described above. Sustainability was seen to touch on all facets of the GLA’s economic, environmental and social activities, and not just confined to mere preservation of the physical environment. In this it was close to the type of integration envisaged in the Act. The list of principles, of which there were eventually some 17 drafts, was first drawn up by a GLA officer and modified after input from other officers and some Assembly members. The first draft covered social and economic sustainability as well as purely physical environmental matters. Officers invested much time and effort in encouraging the various components of the GLA family to adopt and commit to the principles, and initially their passage through the GLA was smooth. However, once their political significance was brought to the attention of the Mayor’s Office they became the subject of substantial revision, with the effect that their reach was largely confined to preservation of the physical environment.



The officers involved, whom we can loosely call the internal sustainability lobby, hoped that the principles would be drawn into and amplified by the individual strategy documents. A September 2000 internal officer report on strategy integration suggested that the draft sustainable development principles and the draft Transport Strategy represented two possible visions for the GLA to adopt in strategy integration. It states: “The early stages of strategy development have already suggested two different visions (Draft Transport Strategy vision,...; and Draft Schedule of Sustainable Development Principles ...).”

### *Consistency of presentation of the strategies*

A rather superficial mechanism for joining up strategies to a common vision began to emerge with the publication of the draft biodiversity and air quality strategies in February 2001. Both drafts contained a brief statement about “the Mayor’s vision for London”. Although it fell short of the vision officers were calling for, it did highlight the goals of “A prosperous city”; “A city for people”; “An accessible city”; “A fair city”; and “A green city”, and said, “Fulfilling this vision requires concerted action which addresses the wide range of economic, social and environmental needs and priorities of Londoners. Economic efficiency must be improved and its benefits shared so as to increase social cohesion and environmental quality, and raise the overall quality of life.” The proposals for the London Plan, used the same headings and said: “The Mayor’s vision is to develop London as an exemplary sustainable world city. This must be based on three balanced and interlocking elements: strong and diverse economic growth; social inclusivity to all Londoners to share in London’s future success; fundamental improvements in environmental management and use of resources.” In the strategies published after the transport strategy, then, a semblance of a unifying vision began to emerge.

### *c) Co-ordinating to the Mayor’s manifesto*

As we noted above, very early on in his Mayoralty, Ken Livingstone sought to reduce his dependence on the bureaucracy of the GLA by creating his own tight-knit office of trusted and loyal colleagues. Arguably this engendered a feeling of distrust between them and the various groups absorbed into the GLA, and led to somewhat artificial, rather than organic links between them and the Mayor’s Office. Many observers commented that Ken Livingstone did not see himself as a manager of a large organisation - that he was more comfortable as representative of his electorate than as leader of the staff of the GLA.

The first attempt to formalise communication between the Mayor’s Office and the GLA bureaucracy was the Mayor’s Management Board. This was a weekly meeting between Ken Livingstone and/or his chief of staff, Simon Fletcher, and the heads of the GLA directorates. The Mayor’s personal advisors, representing the Mayor in his absence, other officers and cabinet advisors were also invited to attend depending on what was being discussed. In the early days it was unclear what precisely constituted a mayoral decision, and increasingly the Mayor’s Management Board came to be seen as the forum for dissemination of Livingstone’s decisions. A later mechanism for improving communication between the Mayor’s Office and the rest of the GLA were the so-called

white-boarding sessions developed by former GLA chief executive Bob Chilton following the rejection by the Mayor's Office of the strategy team's original draft Transport Strategy. White-boarding sessions were attended by one or several of the Mayor's senior advisors, depending on the strategy in question, and senior strategy officers. They were intended to give clear direction on the content of draft strategies from the Mayor's Office. Strategy officers presented their emerging draft strategies to the Mayor's senior advisors, whose job it was to give clear political direction.

In these co-ordination forums, Mayor's Office staff assessed draft strategies in terms of how well they matched the priorities set out in the Mayor's manifesto, in which it is stated: "The single most important priority for the Mayor and Greater London Authority will be to solve the crisis of London's transport system. For a city the size of London and efficient transport system is vital for both business and leisure." (Ken Livingstone's Manifesto for London, undated, p.5). In practice, this meant they judged them against the Transport Strategy - for them the "master" strategy (see above). They also attempted to assess them for business-friendliness or the extent to which they promoted London's world city role. Very soon after Livingstone was elected he commissioned a report from management consultants KPMG about the GLA's relations with the business community.<sup>15</sup> This report set the tone for the Mayor's relationship with the business community (for more details on this see one of our other research papers, Thornley *et al.*, 2002). Briefly, it said that early input into the development of the Mayoral strategies was vital, and that joint working with the business community was essential to ensure London's increased prosperity. Livingstone also appointed John Ross (who worked with Livingstone to produce the *Socialist Economic Bulletin*) as his senior economic advisor, with a remit of liaison with the business community. Ross' influence over strategy development and co-ordination was undoubtedly far-reaching, and many interviewees commented that the Mayor would not adopt any strategy that Ross had not approved. In addition, a consultant from KPMG was employed in the Mayor's Office to carry out business-friendliness appraisal of all the emerging strategies. Business-friendliness appraisal, or world-city friendliness, was a significant strategy co-ordination tool for the Mayor's Office.

The prior integration of strategies undertaken within the Strategy Directorate would either be unravelled in cases of clash with the Mayor's political priorities, or strategy officers would attempt to retrofit the strategies according to the political steer given by the Mayor's personal advisors, in particular emphasising the world-city attributes of the strategies. Two examples are illustrative. During the period we examined, the two strategies most closely linked were the air quality and transport strategies. Officers worked hard to create synergy between the air quality and transport strategies and maximise the potential reduction in road traffic pollution; to this end the draft Air Quality strategy included a low-emission zone roughly coterminous with the congestion charging zone. The release of the air quality strategy was delayed so that it would not coincide with the draft Transport Strategy (published in January 2001). When the draft Air Quality strategy finally emerged in March 2001, the commitment to a low-emission zone had been downgraded to a vaguer commitment to carry out a feasibility study. In the

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<sup>15</sup> *Title* (unpublished document), GLA Mayor's Office, June 2000.

second example, later drafts of the draft Biodiversity strategy were written, at the instigation of the Mayor's Office, to emphasise the economic and 'World City' benefits of biodiversity in London, noting that "London's natural open space acts as a green magnet, attracting and keeping workers and enterprises in London. Greening also plays an integral rôle in the urban renaissance in new and existing infrastructure, the public realm, regeneration initiatives and other developments. The open spaces of London attract tourists, and the green economy provides jobs." (The Mayor's Biodiversity Strategy, 30<sup>th</sup> January 2001, p. 7)

## 5. The role of the Assembly in strategy integration

So far our discussion has focussed on the tensions between the Mayor's Office and the Strategy Directorate over the integration of the Mayoral strategies. What then of the Assembly's role? According to the Act, the principal function of the Assembly was to scrutinise the Mayor's actions and strategies. The Act states (Section 41) that the Mayor must consult the Assembly and the GLA's functional bodies before consulting the other statutory consultees (London Borough Councils and the City of London). During the period of our research the Assembly engaged in various types of scrutiny of the Mayor's strategies, including the examination of issues *before* the Mayor announced his policy ("prior scrutiny"). Strategy co-ordination was also an important concern for the Assembly, and its co-ordination efforts essentially took two forms: attempting to ensure that various strategies were mutually consistent, and trying to use the cross-cutting principles (especially sustainable development) as a co-ordination mechanism. Various committees engaged outside consultants to assess the draft strategies against these criteria. However, the committees adopted different approaches to co-ordination, which gave different results.

It is instructive to look at a case study: the assembly's response to the draft Economic Development Strategy produced by the LDA. Four assembly committees - three permanent and one ad-hoc - examined this draft, each from its own particular point of view.

In February 2001 the Assembly's Transport Policy and Spatial Development Committee examined the draft Economic Development Strategy, comparing it in detail with the draft Transport Strategy<sup>16</sup>. The purpose of the committee report was "to identify differences - inconsistencies and conflicts - between the two." There followed nine pages of comparisons of the sentences and phrases of one document with those of the other - for example:

"Although both the draft Economic Development Strategy and the draft Transport Strategy include the Thames Gateway, the Lee Valley, and Stratford and the Royal Docks as areas for regeneration, the draft Economic Development Strategy does not include the Wandle Valley and Western Wedge, both of which

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<sup>16</sup> "Draft Economic Development Strategy: Commentary on Transport Aspects", Report 5, agenda of GLA Transport Policy & Spatial Development Policy Committee, 6 February 2001.

are identified in the draft Transport Strategy (draft Transport Strategy para 3.24). Again, consistency seems necessary.”<sup>17</sup>

Although it was nowhere stated explicitly, the Transport Strategy was clearly the benchmark - all inconsistencies are held to be flaws in the LDA strategy rather than in the draft Transport Strategy. (In this, at least, the committee would appear to have been at one with Ken Livingstone, for whom the Transport Strategy was most important.) The Transport Policy and SDS Committee here followed the same co-ordination mode as the Mayor.

At the same time, the Assembly’s Environment Committee reviewed the Economic Development Strategy. The committee engaged consultants Envirospire, who produced reports for its 12 December and 13 February meetings.<sup>18 19</sup> Their approach was twofold: they briefly compared the draft transport and economic development strategies for consistency (something that, it emerged in the committee meeting, had not been in their brief), but mainly examined the latter in the light of one of the cross-cutting themes: sustainable development. The December report took each point of the “Assembly’s Emerging Sustainable Development Principles” and commented on the proposals in the draft strategy in that light—using the principles as the “master”, as some of the Strategy Directorate advocated. For example,

‘Cross-cutting Theme A8: *To Encourage the use of local (i.e. London or towns within London) suppliers and the employment of local labour wherever possible.*

Commentary: Support is promised for community-based regeneration and social enterprises, but there is no specific focus on encouraging greater integration and inter-dependence on London’s businesses. Similarly, there is no specific focus on favouring the use of locally-based labour, although longer-term (chiefly public sector) initiatives are identified in housing maintenance, community safety, personal and health care, environmental projects and childcare.<sup>20</sup>

The consultants’ second report abandoned the comparison of strategies and focused exclusively on sustainable development, saying “There is concern that it appears that the approach to the draft Economic Development Strategy has not used the emerging sustainable development principles as *the essential template* for its formation”<sup>21</sup> (emphasis added). Clearly the Environment Committee viewed the sustainable development principles, and not the Transport Strategy, as the benchmark for all the strategies.

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<sup>17</sup> Ibid, para 4.7.

<sup>18</sup> “Review of Cross-Cutting Themes and Environmental Consistencies between Strategies—Economic Development Strategy”, Report 5, agenda of GLA Environment Committee, 12 December 2000.

<sup>19</sup> “Scrutiny of the Economic Development Strategy”, Report 6, agenda of GLA Environment Committee, 13 February 2001.

<sup>20</sup> Ibid, Appendix p. 5.

<sup>21</sup> “Scrutiny of the Economic Development Strategy,” p.4.

The third committee to look at the draft was the “Economic Development Scrutiny Panel”, which met in December 2000 and January 2001 with the specific remit of scrutinising the draft Economic Development Strategy. It had nine members (the membership changed slightly from one meeting to the next). Integration with other strategies was not the main focus of these meetings, although “The Panel were assured that as the LDA revised its strategy it would take into account other strategies depending on their stage of development.” The panel did discuss the interface between the LDA strategy and the Transport Strategy. According to the minutes of the 11 January meeting, the LDA “accepted the need for joined-up working in the GLA family,” but “were unable to provide the Panel with a list of the number of comments that they had made which had been incorporated into the Mayor’s Transport Strategy as the LDA were not resourced adequately at the time to make a detailed response.”

The panel also asked whether the LDA accepted the use of the sustainability principles as an integrating tool. According to the minutes, LDA Chief Executive Mike Ward “accepted that it might be possible for sustainability principles to clash with the LDA’s economic agenda and that there were unresolved tensions in this area.” (A rare public acknowledgement that the GLA’s pursuit of sustainable development might involve difficult choices.)

Finally, the Economic Development Committee (most of whose members were also on the scrutiny panel) looked at the draft EDS on 19 February 2001. They received from the scrutiny panel a draft response to the EDS, to be approved by the committee and then by the full Assembly. This response was prepared by consultants ECOTEC, and incorporated some of the findings of the Environment and Transport Policy and SDS committees; the full reports of the TP&SDS and Environment committees were appended.

Of the fifteen recommendations in the response, three dealt specifically with integration:

“11. The LDA must ensure that the (sustainable development) principles, and a common definition of sustainable development, lie at the heart of the strategy.

13. The Strategy must explicitly show how it will feed into the development of other Mayoral strategies.

14. The Strategy must clearly link with other relevant Mayoral strategies, external programmes and existing expertise.”<sup>22</sup>

According to the response, “The Assembly does not feel that linkages between strategies are sufficiently integrated, particularly with the Transport Strategy and the Spatial Development Strategy.”<sup>23</sup> It stated several times that the principles of sustainable development should form the framework for the EDS. The Economic Development

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<sup>22</sup> “An interim response to the Draft Economic Development Strategy produced by the London Development Agency”, Report of GLA Economic Development Committee, 27 February 2001, p. 3.

<sup>23</sup> Ibid, p. 6.

Committee approved this response with some modifications, several of which strengthened the references to sustainable development, and the full Assembly in turn approved it on 28 February 2001.

The foregoing account raises two questions: First, was the Assembly's co-ordination effort itself co-ordinated? The draft strategy was considered by five different combinations of Assembly members in the space of only three months. (The Assembly's consideration of the strategy coincided with public consultation – an indication perhaps of the lack of weight given by the Mayor to the Assembly's views.) These various exercises reflected the Assembly's committee structure, but was this the most effective way for the Assembly to consider the draft?

Second, what was the impact of the Assembly's labours on the final Economic Development Strategy - was it in fact more consistent with other strategies, and with the goal of sustainable development, because of the Assembly's work? At least two further drafts of the document were produced after the Assembly's scrutiny closed, but although the final EDS was due out in March, it was not published until July.

## **6. Conclusions**

Finally we summarise our main findings and offer some comments on the wider implications for the future of policy integration within the GLA and for the GLA project itself.

The GLA Act implies a long-term and rational approach to the integration of the Mayor's strategies. However, our research into the early strategy integration of the GLA indicates that within the core GLA there were a variety of positions regarding strategy integration. For its part, the Bureaucracy took up the position closest to the Act, adopting a professional and balanced approach, which included the development of mechanisms that would take account of the longer term balancing of the GLA's three principal purposes. Two specific approaches to developing a long-term template were attempted: the Pan London Development project and the sustainability principles. These two approaches, although not mutually exclusive, were developed in isolation from each other, and, more importantly, in isolation from the integration activity being pursued by the Mayor's Office. For the Mayor's Office the need to make a visible impact on the lives of Londoners was the main concern and the implementability and political salience of the strategies were what counted. Indeed the highly centralised and expanded Mayor's Office was created in order to drive through a political agenda, and in some senses strategy integration was seen as a barrier to its expeditious implementation. Even the rather anodyne and technical form of strategy integration, initiated within the Bureaucracy - cross-cutting themes appraisal - was hard to pursue in the face of the overt political prioritisation and sequencing of the strategies. Assembly scrutiny might have offered a way of keeping political expedience in check, but the structural position of the Assembly meant it took a combative role rather than a pro-active one. Additionally, given the tight timetabling of strategy scrutiny, its contribution to the integration of the strategies was truncated and marginalised.

Clearly establishing the GLA was a major undertaking. There was no experimentation period, the GLA, and more importantly the Mayor, had to deliver from day one. The first nine months were bound to be difficult. The Act was vague and its requirements, processes and strategies were completely new. There was bound to be a settling in period as new staff were recruited and organisational methods developed. Indeed, in conversations we have had with key individuals within the GLA about policy integration, there is a prevalent optimistic view that the GLA will develop a mechanism for integrating the mayoral strategies, and that allowances must be made for it being a new organisation. While this view perhaps demonstrates the continuing enthusiasm for the new governance arrangements for London, it is based on a strongly functionalist analysis of organisations, and downplays the very real tensions between the institutional cultures revealed through the process of policy integration. The hypothesis of ‘evolved functionalism’ (Pierson, 2000) that this view of the GLA would appear to convey is but one hypothesis. What was most striking in the first nine months was the presence of entirely different cultures and interpretations of how strategy should be developed and integrated (see one of our other research papers, Rydin *et al.* 2002, for an analysis of the clash of organisational cultures in the GLA).

In our view there are inherent tensions between the political nature of the elected mayor system and the need to establish a robust statutory framework that both fills the perceived strategic vacuum that has dogged London since the disbanding of the GLC, and is acceptable to the implementation agencies that are ultimately primarily responsible for delivering the Mayor’s strategies. While the Assembly lacks real bite, neither are we optimistic that it can be effective in attenuating the Mayor’s short-term political drive in favour of a longer-term strategic horizon. The question for future research is: can the GLA evolve to meet its functional requirement to integrate policy, or is there something in the nature of the GLA project itself - a strategic, enabling authority with no direct responsibility for service provision; a strong executive Mayor and weak Assembly - that makes policy integration unattainable? Is there anyone in the organisation whose interests will be served by better strategy co-ordination? The ‘rational’ civil servants that drafted the Act have long gone and the politics of governance shapes the process – in this political arena the powerful actors may prefer to work with the contradictions and tensions between strategies.

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