

Ms Priscilla Ogie
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URGENT

17th May 2024

Dear Ms Ogie,

**Re Planning Application: 24/03027/ADV
Regent Street, London: Display of sixty flags measuring 4m x 2m suspended by catenary wires at twenty locations over Regent Street for a temporary period from 02 June 2024 to 08 July 2024.**

I write on behalf of Christian Concern in relation to the above application.

This will be the third year that this display is proposed to be held. While the justification for the original display in 2022 was to celebrate “50 years of Pride in the UK” it is now clear that it is proposed that this particular flag display becomes a permanent feature of London’s calendar. Accordingly, it is essential that the Council now fully assesses the implications of the proposed display and ensures that it fully discharges its statutory duties including those under the Equality Act 2010, and, that a fully informed decision is made by elected Members, starting with the Planning Committee, and, provided with the necessary officer reports.

Christian Concern supports and campaigns for the inherent dignity of each and every person but believes that the proposed display is divisive. Its now annual repeat does nothing to foster good relations between people of different beliefs and viewpoints, it is demeaning and offensive to women, risks marginalising already marginalised groups and it risks indoctrinating children into controversial ideological theories which are devoid of any proper scientific support.

The Flag

The flag for which permission to display is sought (the “Flag”) purports to represent many interests related to peoples’ sexual preferences or identities. It is not the original Pride flag but has already been described as *a hodgepodge of ideological wokery and as a “design abomination”* by people involved in the original Pride movement. The interests include identities (for example “*queer*”, “*intersex*”, “*pansexuality*”, “*gender fluidity*” and “*non-binary*”) which are not categories recognised in UK law and are not protected characteristics under the Equality Act 2010. The Flag embodies gender theory which is not recognised in UK law and is highly controversial as well as being devoid of any serious scientific underpinnings.

Divisive

The Flag proclaims a secular religious ideology which seeks to group together categories of people based upon their sexual preferences and identity: in doing this it creates division between those people who do not recognise themselves under the umbrella of its myriad causes and those that do. Those who do not join under the Flag have been considered as “hateful”, “discrimnatory”, “intolerant” and “bigoted”.

In fact, the use of this type of flag is objected to by many people whose own sexual preferences are ostensibly promoted by it. This is not just because many people do not wish to be identified by their sexuality but also because some of the disparate causes the Flag purports to represent are at ideological loggerheads. Thus, sadly violence between homosexual and trans groups at Pride events has become increasingly evident in recent years since many homosexual people view the trans movement as grossly offensive to their own identity and as undermining the very rights they fought to obtain (the idea that if one has same-sex attraction that one should reassign one’s gender is seen as extremely offensive to many homosexuals).

It would be hard to imagine that Westminster City Council would approve, without serious investigation as to its impact, a proposed display by a religion that wished to erect dozens of giant flags all proclaiming the truth of its religion to the exclusion of all others; and yet this is essentially what the Flag is doing: raised far above everyone's heads it proclaims a divisive ideology of identity politics with a moral obligation to accept all manner of sexual expression as morally acceptable.

Demeaning

The Flag is not only divisive but it is demeaning to the majority of people whose core identity is bound up in their biological sex. It is notable that 2023 and 2024 are years which marked the beginning of a societal reaction against the inclusion of trans-women in female sports with various international sporting federations recognising that it is grossly unfair to biological women to have to compete against so called trans-women (who might be men who, by simply identifying as women, thereby considered themselves entitled to compete in female sports competitions). This battle for true equality which recognises and celebrates the differences between the sexes has been promoted and has been hard-fought for by women's rights groups. Instead, by promoting trans rights in all its forms, the Flag becomes a symbol which demeans biological women.

Marginalising

Whilst ostensibly promoting tolerance, in fact, the Flag becomes a symbol of intolerance towards anyone who does not endorse its values of sexual libertinism and the highly controversial sociological theories upon which these rely. As a result the display of the Flag in 2024 will act to marginalise those who do not agree with the message being proclaimed. The risk of marginalisation is particularly acute in the case of people with traditional religious beliefs who risk also being stigmatised by the proposed display.

We have been contacted by many religious people who have told us how uncomfortable they felt going into Regent Street last year under those flags, not because those people objected to people being free to promote the message or to fly a flag but because the atmosphere created by lining the sky above Regent Street with giant ideological banners was one in which their own views and identity was not felt welcome, and, as a result they felt stigmatised.

Indoctrinating

The Government has just announced that it will prohibit the indoctrination and confusion of primary school children with trans ideologies, yet this display proposes to do just that, exposing the 100s of thousands of children who walk up and down Regent Street, including those who visit Hamleys, to a message and symbols which will be unlawful to teach and display in schools.

More than one visitor has remarked that Regent Street last year in June appeared to be decked out for a Nuremberg type Rally. It would be entirely inappropriate for Westminster City Council to continue to endorse an oppressive and overbearing promotion of a divisive ideology, especially one which risks indoctrinating children and marginalising the vulnerable.

Lack of Adequate Consultation

Regent Street is a major shopping street attracting visitors from all over the country as well as internationally. The impact of the display is not simply on those in the immediate neighbourhood but affects a huge number of visitors and commuters. The application form records that "*The Crown Estate have liaised with the neighbours and local community*". There is, however, no evidence of that consultation to support that statement, let alone demonstrable evidence of any adequate consultation that has been undertaken with any groups or people likely to be impacted by the Flag and its divisive ideology.

Christian Concern therefore submits that in light of the issues identified in this letter, no approval should be given to the proposed display this year absent a full Equality Impact Assessment which needs to include a full consultation with the minority groups who risk being marginalised and stigmatised by this display as well as with churches, religious organisations and other faith groups

representing views which would be threatened by the militant promotion of the Flag's ideological message.

The applicants have made the application very late in the day; but this failure to submit a timely application cannot prejudice the rights of others to have their interests properly taken into account and if necessary to challenge any decision by the Council: if the applicants' tardiness means that this year they are not able to erect their display in June then this matter should not influence the Council's decision-making.

Breach of Planning Control

Finally, it should be noted that last year's consent for the similar application by the same applicants was for a temporary display which was to be dismantled promptly at the end of the permitted period. The first of the additional conditions recorded:

"You can display the advert from 11 June 2023 to 10 July 2023. You must then remove it without delay. (C04BA)

Reason:

The advert is temporary, so under Policy 43 of the City Plan 2019-2040 (April 2021), we can only approve it for a limited period. (R04AC)"

In fact, contrary to the consent given, the flags were left in place for many weeks after expiry of the display term, no extension of permission having been sought or granted. Unfortunately, this casual approach demonstrates the contempt which the applicants displayed towards the terms of the advertisement consent and is a further reason why approval should not be granted for, effectively, the same display this year based on the current material before officers.

Next Steps

Given the significant issues that this letter raises I ask that no approval is granted upon the basis of the current submission.

Furthermore, I request that this letter is placed before the Planning Committee and that its Members be given the opportunity to discuss those issues and their outworkings.

In any event, I further request that Christian Concern be given timely notice of any decision in relation to this display so that, if necessary, more formal, further action may be taken.

I confirm that we remain at the Committee's disposal, and, are willing to assist both Members and officers with the provision of further evidence of the harm that the display would cause to people with protected characteristics under the Equality Act 2010.

Yours sincerely,