

GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION – MD3397

Delivery Plan – Reducing Non-Residential Emissions

Executive summary:

The delivery plan for the strategic programme Reducing Non-Residential Emissions is presented here for approval by the Mayor, in line with the refreshed delivery and governance processes laid out in Mayoral Decision (MD) 3274.

The core London-level outcome to which this programme will contribute is: London is a net-zero carbon city. The delivery plan also contributes to a wider set of London-level outcomes: London's economy has the skills it needs to thrive; Londoners have access to good work; London is a world-leading global city; Londoners are breathing clean air; and London is resilient to extreme weather and the impacts of climate change.

The Reducing Non-Residential Emissions delivery plan describes how the GLA will work to drive down emissions from London's buildings, support a flexible low-carbon energy system, enable the financing of the transition to net-zero, reduce waste, and connect Londoners with our net-zero ambition.

Decision:

That the Mayor:

1. approves the establishment of the Reducing Non-Residential Emissions programme, with the Assistant Director, Environment and Energy as the Senior Responsible Owner
2. approves the delivery plan for the Reducing Non-Residential Emissions programme (Appendix 2) including the resources allocated to it which are: £30,932,000 of revenue and £235,154,000 of capital funding across 2025-26, 2026-27 and 2027-28, as set out in the delivery plan, as well as the proposed budget transfers as set out in paragraphs 1.20 to 1.23 and 5.3
3. delegates authority to the Assistant Director, Environment and Energy to approve the receipt of any additional funding from central government or other sources to expand or extend existing approved projects contained in the Reducing Non-Residential Emissions delivery plan, where the parameters of the project remain the same or similar, and after consulting with legal advisors and the GLA's Chief Finance Officer and subsequently having secured agreement from the Mayoral Delivery Board
4. where not already covered by a delegation in an existing Mayoral Decision, delegates authority to the Assistant Director, Environment and Energy to approve expenditure funded by decisions 2 and 3 above for delivery of the projects listed in paragraphs 1.15 and 1.16.

Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:



PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

Decision required – supporting report

1. Introduction and background

Background

- 1.1. The Greater London Authority (GLA) has been establishing refreshed delivery and governance arrangements over the last few months.
- 1.2. In undertaking these changes, we have:
 - defined a set of London-level, long-term outcomes which reflect Londoners' aspirations for the city and towards which the GLA and the GLA Group are working, in partnership with others
 - agreed a small set of strategic, high-level, programmes which the Mayor will commission the GLA Group to deliver in order that the GLA and the GLA Group make the appropriate contributions towards the London-level outcomes.
- 1.3. [MD3274 'Updates to GLA Governance Documents'](#), published on 13 June 2024, marked the first formal step in implementing new portfolio and governance arrangements and set out approved revisions to the arrangements through which the Mayor exercises and, where appropriate, delegates his powers. It also laid out some changes to the way the GLA's senior leadership works to ensure that the GLA is successful in exercising its strategic role and in securing delivery.
- 1.4. The GLA is now bringing forward for approval delivery plans for the 14 strategic, high-level, programmes which are led by the GLA and involve functional bodies as appropriate. These are numbered 1-14 and set out below, along with delivery plans 15-21, where the relevant GLA Group organisation is taking a leadership role:
 1. Building more homes
 2. Making best use of land
 3. Improving London's housing stock
 4. Reducing inequalities
 5. Accommodation and wider support for those who need it most
 6. Reducing non-residential emissions
 7. Delivering a greener, more climate-resilient London
 8. Cleaning London's air
 9. Supporting Londoners to benefit from growth
 10. Supporting and inspiring young London
 11. Boosting London's growth sectors
 12. Helping local economies to thrive
 13. Upgrading London's infrastructure
 14. Supporting community, cultural and sporting events in London
 15. Reducing violence and exploitation

16. Building safer, more confident communities
17. Supporting and overseeing reform of the MPS
18. Improving the Criminal Justice System and supporting victims
19. Healthy streets
20. Decarbonising transport
21. Providing more effective, accessible and affordable public transport.

- 1.5. The Mayor has been issuing mandates for these proposed programmes to prospective Senior Responsible Owners (SROs). Mayoral mandates define what the Mayor wants to see from each of the programmes, including their scope, objectives, and cross-cutting priorities. Programmes and their associated delivery plans have been developed by the proposed programme SROs, working with the relevant Deputy Mayors, Mayoral Directors and others in response to the Mayor's mandates. They have been developed to strike the right balance between setting out plans and retaining flexibility to respond to events and learning, as delivery progresses, recognising that agility is important in the context of a changing landscape.
- 1.6. Delivery plans lay out the London-level outcomes to which each programme contributes. In considering the GLA's specific role in contributing to the London-level outcomes, programme SROs have focused on the role of the GLA as London's strategic regional authority. This has meant looking carefully at where activities most effectively sit within the London system and how the GLA can work with partners to unlock and drive progress. In some cases that will be through direct delivery or through funding. In others it will be through more indirect mechanisms such as system reconfiguration, coalition formation, technical support or capacity building.
- 1.7. Resource allocations to each programme are based on the allocations contained in the [GLA: Mayor Budget 2025-26](#). Changes required to delivery plans over time will be agreed by the Mayoral Delivery Board (MDB) or the Mayor in line with our revised governance arrangements.
- 1.8. Delivery plans lay out how each programme makes a positive difference to the relevant London-level outcomes. Key programme outputs are also detailed and will be reported quarterly to MDB, which is responsible for monitoring the performance and delivery of each programme's delivery plan.

Overview of the Reducing Non-Residential Emissions delivery plan

- 1.9. The Mayoral mandate for the Reducing Non-Residential Emissions programme is appended to this Decision form at Appendix 1. The proposed delivery plan is appended at Appendix 2 and presented by the Assistant Director, Environment and Energy, as the proposed SRO, for the Mayor's approval.
- 1.10. By approving the plan, and the resources allocated to it, the Mayor is enabling the GLA, working with partners, to contribute to the core London-level outcome: London is a net-zero carbon city.
- 1.11. The Mayor has set a target for London to be net-zero by 2030, demonstrating leadership in tackling climate change globally. Climate change is a matter of social justice. The areas in our city that face the greatest risks from climate change are also often home to poorer residents, and in those low-income communities Black and Minority Ethnic Londoners are over-represented. Leading the way in tackling climate change is about protecting these and all Londoners, as well as using carbon reduction initiatives to create wider improvements to their lives and our city. This Reducing Non-Residential Emissions delivery plan sets out the efforts for London's commercial and public estate as well as the city's energy and waste systems. This area of work is responsible for more than 30 per cent of London's carbon emissions.
- 1.12. The plan contains five key strands:
 - reducing emissions from London's buildings

- supporting a flexible low-carbon energy system
- enabling the financing of the transition
- tackling emissions from waste and promoting a circular economy
- leading by example and connecting Londoners with our net-zero ambition.

1.13. The Reducing Non-Residential Emissions delivery plan sets out the budget for each project within the programme.

1.14. Projects detailed in the delivery plan fall into one of two categories:

- projects which are already set out in detail in an existing Mayoral Decision (MD) or Director Decision (DD)
- projects for which this Mayoral Decision seeks a Mayoral delegation to the SRO to take expenditure decisions.

1.15. The projects with Mayoral Decisions and other relevant approvals already in place are:

- delivering the greener schools initiative – approved under MD3365, MD3297 and MD3390
- ensuring London’s planning policies support a transition to a circular, zero carbon economy while delivering housing and economic growth – approved under MD2964 and MD3301
- continuing delivery of the London Community Energy Fund – approved under MD3418
- driving a pipeline of viable and investible decarbonisation projects – approved under MD3133 and DD2690
- financing projects through the Mayor’s London Climate Finance Facility – approved under MD3186, MD2165, MD2597, MD2865, MD3128
- maintaining London’s role in climate leadership – approved under DD2734, MD2363 and DD2259.

1.16. Projects for which this Mayoral Decision seeks a Mayoral delegation to the SRO to take expenditure decisions are:

- ensuring London’s planning policies support a transition to a zero-carbon economy while delivering housing and economic growth (£100,000 in 2025-26; £100,000 in 2026-27; £100,000 in 2027-28)
- financing projects through the Mayor’s London climate finance facility (£800,000 in 2025-26; £800,000 in 2026-27; £800,000 in 2027-28)
- tackling emissions from waste and promoting a circular economy (£110,000 in 2025-26; £90,000 in 2026-27; £90,000 in 2027-28)
- maintaining London’s role in climate leadership (£230,000 in 2025-26; £230,000 in 2026-27; £230,000 in 2027-28)
- ensuring the GLA Group is leading by example (£125,000 in 2025-26; £125,000 in 2026-27; £125,000 in 2027-28).

1.17. One project will require a separate Mayoral Decision because it is introducing new large-scale funding. It is:

- grant from the Mayoral Renewables Fund for west London solar projects (£750,000 in 2025-26 funded by the Department for Energy Security and Net Zero).

1.18. The Assistant Director, Environment and Energy, will ensure compliance with the obligations set out in The Openness of Local Government Bodies Regulations 2014 which describe when written records of decisions and their content need to be published. Director Decisions and Assistant Director Decisions will be required where appropriate to meet these transparency requirements, including in instances where GLA funds are paid to external organisations.

Budget transfers

- 1.19. Development of the delivery plan has prompted refinements to the published GLA budget. As a consequence, Mayoral approval is sought for budget transfers, in accordance with governance processes, as set out in paragraphs 1.20-1.23. Totals for each year are outlined within the financial comments at section 5 below.
- 1.20. Funding for the work of readying London's infrastructure for the future and enabling new infrastructure needed for housing and productivity, through the Local Accelerator Energy and Solar Grant programmes, was included within the Reducing Non-Residential Emissions programme when the GLA 2025-26 budget was approved in March 2025. It is proposed that it is more appropriate for this programme to be included within the Upgrading London's Infrastructure programme. This MD seeks Mayoral approval to a budget transfer of this funding accordingly.
- 1.21. Funding for the work of creating and financing a pipeline of climate projects, making use of the Mayor's London Climate Finance Facility, specifically for decarbonisation programmes, was included within the Improving London's Housing Stock programme when the GLA 2025-26 budget was approved in March 2025. It is proposed that it is more appropriate for this programme to be included within the Reducing Non-Residential Emissions programme. This MD seeks Mayoral approval to a budget transfer of this funding accordingly.
- 1.22. Funding for the work relating to the flexible, low carbon energy system, by continuing the delivery of the London Community Energy Fund and maintaining London's role in climate leadership was included within the Delivering a Greener, More Climate Resilient London programme and the core budget when the GLA 2025-26 budget was approved in March 2025. It is proposed that it is more appropriate for this programme to be included within the Reducing Non-Residential Emissions programme. This MD seeks Mayoral approval to a budget transfer of this funding accordingly.
- 1.23. A budget transfer is required from the Reducing Non-Residential Emissions programme to Core Corporate, relating to transferring back to GLA reserves funding not required in 2026-27 and 2027-28. This MD seeks Mayoral approval to a budget transfer this funding accordingly.

Securing additional funding for projects in the delivery plan

- 1.24. Key to meeting the objectives and expected outcomes of the Reducing Non-Residential Emissions delivery plan is securing funding to support the delivery of both new and existing projects. This funding may come from central government, but may also come from other sources including philanthropic funders and the private sector.
- 1.25. Where funding is secured in the future to support the delivery of projects with legacy approvals in place, this decision form seeks approval to agree the receipt of such funding by the GLA without the need for a further Mayoral Decision. This would be for any funding secured to deliver projects that are already approved, and which contribute to the Reducing Non-Residential Emissions delivery plan.
- 1.26. Where additional funding from government (or other sources) is secured in the future to expand, or extend, existing approved projects contained in the Reducing Non-Residential Emissions delivery plan, and the parameters remain the same, or similar, as originally agreed with government (or the relevant body), this Decision form seeks approval to delegate to the Assistant Director, Environment and Energy to agree the receipt of such funding after consulting with legal advisors and the GLA's Chief

Finance Officer and subsequently having secured agreement from the MDB. For the purposes of considering whether the parameters are similar as originally agreed with government (or the relevant body), the Assistant Director, Environment and Energy will have regard to whether the outcomes to be delivered have changed significantly or there is a significant change in attendant risks of the original scheme. If the outcomes to be delivered have changed significantly, there is a significant change in attendant risks, or the decision is viewed as novel, contentious or repercussive, a Mayoral Decision will be required.

- 1.27. Any decisions to accept additional funding will need to comply with the obligations set out in The Openness of Local Government Bodies Regulations 2014 as highlighted in paragraph 1.18 above. Any decisions to accept additional funding that do not require a formal decision form must be documented via a Record in Writing, as defined in MD3274 'Updates to GLA Governance Documents', signed in June 2024, and will be reported, publicly, quarterly.

2. Objectives and expected outcomes

- 2.1. The delivery plan for the Reducing Non-Residential Emissions programme describes how the GLA will drive down emissions from London's buildings, support a flexible low-carbon energy system, enable the financing of the transition to net-zero, reduce waste, and connect Londoners with our net-zero ambition. It aims to advance social justice by targeting our interventions where they're needed most, while creating a positive vision for change based on unlocking economic opportunities and wider benefits for Londoners.
- 2.2. The objectives and expected outcomes of the programme are set out in the Reducing Non-Residential Emissions delivery plan which is appended as Appendix 2.
- 2.3. The core London-level outcome to which this programme will contribute is London is a net-zero carbon city.
- 2.4. The Reducing Non-Residential Emissions programme will also make a substantive contribution to the London-level outcomes: London's economy has the skills it needs to thrive; Londoners have access to good work; London is a world-leading global city; Londoners are breathing clean air and London is resilient to extreme weather and the impacts of climate change.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, the Mayor and GLA must comply with the public sector equality duty (PSED) and must have due regard to the need to:
 - eliminate unlawful discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Equality Act
 - advance equality of opportunity between people who share a relevant protected characteristic and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 3.2. The 'protected characteristics' are: age, disability, gender re-assignment, pregnancy and maternity, marriage and civil partnership (but only in respect of the requirements to have due regard to the need to eliminate discrimination), race (ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, and sexual orientation.
- 3.3. Consideration of the PSED is not a one-off task. The duty must be complied with before taking a decision, at the time of taking a decision, and after the decision has been taken, to ensure that equality impacts are kept under ongoing review.

- 3.4. The Reducing Non-Residential Emissions delivery plan is aligned with the policies and proposals in the London Environment Strategy, which has been informed by a full integrated impact assessment, including consideration of equality impacts. The Equality Impact Assessment Report for the London Environment Strategy noted that exposure to poor environmental conditions is much higher among Black, Asian and Minority Ethnic Londoners.
- 3.5. Climate impacts are felt unequally across London, with poorer, disadvantaged communities often living in conditions that magnify the impact of climate change. Climate impacts can also be felt disproportionately amongst people with protected characteristics, and there is a high level of intersection across impacts. UK Black, Asian and Minority Ethnic residents are four times more likely to live in areas vulnerable to heat risk compared with white people. 85 per cent of residents in areas with illegal levels of nitrogen oxide are in the poorest fifth of the population. A survey of local authorities found that the five groups most vulnerable to climate risks are low-income households, elderly people, minority groups, young people and vulnerable health groups.
- 3.6. Actions within this delivery plan will reduce reliance on fossil fuels, drive investment in cleaner technologies, while providing economic opportunities for London and Londoners. These outcomes will benefit all Londoners, including those with protected characteristics. During further and more detailed design of parts of the programme and during and in its implementation, the Climate and Equalities Toolkit will be used to assess the climate and equality implications and ensure that any issues identified have appropriate strategies to mitigate negative impacts or amplify positive ones. The equality impacts of the Reducing Non-Residential Emissions programme will be kept under review as appropriate to ensure that the PSED is complied with on an ongoing basis.

4. Other considerations

Risks and issues

- 4.1. The following programme-level risks to the delivery of the Reducing Non-Residential Emissions programme have been identified:

RISKS	MITIGATIONS
The climate emergency worsens at a pace faster than the Mayor and London can take action and/or beyond the Mayor's powers or influence	<ul style="list-style-type: none"> • Prioritise work where the Mayor has influence to try to maximise outcomes • Work closely with government, boroughs and key stakeholders to embed delivery and secure change in areas that fall outside of the Mayor's statutory remit • Regularly review plans and consider new approaches where appropriate
There is insufficient capability, capacity and funding among boroughs and key institutions to deliver climate mitigation, sustainable development and waste outcomes that reduce emissions and ensure a just transition to a low carbon circular economy	<ul style="list-style-type: none"> • Work closely with government to identify new funding schemes that can provide necessary resources to boroughs and key sectors • Think strategically about how to ensure London has access to private finance at scale to plug financial gaps unable to be met by the public sector • Use the climate budget process to identify measures at the London level that should be prioritised
Climate actions are not coordinated; or drive conflicting or sub-optimal outcomes	<ul style="list-style-type: none"> • Use the climate budget to ensure the GLA and GLA Group identify and support complementary actions that maximise carbon reductions, while delivering wider benefits

	<ul style="list-style-type: none"> • Ensure clear sector plans are developed with partners that set out clear governance frameworks, identify actions and the owners responsible for delivery • Monitor and report on the impact of programmes and actively engage Londoners and stakeholders on climate actions
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- 4.2. The Assistant Director for Environment and Energy as the SRO for the programme will be responsible for implementing and overseeing a risk framework for the programme. Project risks and mitigations will be managed as they are currently at a project level and reported periodically to the programme board. The programme board will also review the above programme-level risks and mitigations, reporting to Mayoral Delivery Board alongside progress against programme objectives as part of the GLA's quarterly reporting regime.

Links to Mayoral strategies and priorities

- 4.3. The programmes outlined in this decision support the following Mayoral strategies:

- The delivery plan sets out details of interventions that will support the Mayor's commitments and policies. It will contribute towards the following policies:
 - 4.2: Reduce emissions from London's road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport.
 - 6.2.1: Delivering more decentralised energy in London.
 - 6.2.2: Planning for London's new smart energy infrastructure.
 - 10.1.1: To build on London's strengths and grow the low carbon and environmental goods and services sector.
 - 10.1.2: To build on London's strengths and enable London's businesses, academia and citizens to actively compete in and contribute to the low carbon circular economy.

It will also contribute towards the following objectives:

- 4.2: Achieve legal compliance with UK and EU limits as soon as possible, including by mobilising action from London boroughs, government and other partners.
- 6.2: Develop clean and smart, integrated energy systems utilising local and renewable energy resources.
- 6.3: A zero emission transport network by 2050.
- 10.1: Enabling the transition to a low carbon circular economy of the London Environment Strategy.

In developing this delivery plan, the continued relevance of the London Environment Strategy has been kept under review.

- The delivery plan will also operate in line with other strategies, plans and report recommendations, such as London Net Zero 2023: An Updated Pathway and the Green New Deal mission.
- This programme will also contribute towards a number of other policies, including the following policies from the London Plan:
 - SI 2: Minimising greenhouse gas emissions

- SI 3: Energy infrastructure
- SI 7: Reducing waste and supporting circular economy
- SI 8: Waste capacity and net waste self-sufficiency
- SI 9: Safeguarded waste sites
- T2 'Healthy Streets.

It will contribute towards the following policies from Economic Development Strategy:

- 4.2: Transport – includes the healthy streets approach; healthy streets and healthy people; public transport capacity improvements; unlocking homes and jobs.
- 4.3: Infrastructure – includes improving the planning, coordination and delivery of infrastructure; the data economy; digital infrastructure; water infrastructure; localised and renewable energy; reducing waste; protecting and enhancing London's environment and green infrastructure.
- 5.5: Low carbon and environmental goods and services – includes transition to a low carbon circular economy; making London a more resource efficient city; innovation and growth across London's cleantech sector.

It will contribute towards the following policies from the Mayor's Transport Strategy:

- 1: The Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.
- 2: The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London a city where people choose to walk and cycle more often by improving street environments, making it easier for everyone to get around on foot and by cycle, and promoting the benefits of active travel. The Mayor's aim is that, by 2041, all Londoners do at least the 20 minutes of active travel they need to stay healthy each day.
- 7: The Mayor, through TfL and the boroughs, and working with stakeholders, will seek to make London's transport network zero emission by 2050, contributing towards the creation of a zero carbon city, and also to deliver further improvements in air quality to help meet tighter air quality standards, including achieving a health-based target of 10µg/m³ for PM2.5 by 2030. London's streets and transport infrastructure will be transformed to enable zero emission operation, and the switch to ultra low and zero emission technologies will be supported and accelerated.

It will contribute towards [ambition 3 from the London Growth Plan, green growth](#): Accelerate progress towards achieving London's net zero target for 2030.

Consultations

- 4.4. For projects which already have a formal decision form in place, the consultation undertaken for these projects is set out in the relevant decision forms.
- 4.5. For other projects, the type and timing of engagement and consultation will vary. This may include engagement with relevant stakeholders such as delivery partners, community stakeholders and advisory groups as well as consultation where appropriate.
- 4.6. There are no conflicts of interest arising from those involved in the drafting and clearance of this decision form. Should individual conflicts of interest arise during the delivery of initiatives contained in the Reducing Non-Residential Emissions delivery plan, they will be addressed in line with the GLA

policy on managing, registering and declaring interests.

5. Financial comments

5.1. The programme budget is set out in the delivery plan and summarised in the table below:

	Revenue			Capital		
	25-26 £000	26-27 £000	27-28 £000	25-26 £000	26-27 £000	27-28 £000
1. Reducing emissions from London's buildings	350	100	100	-	-	-
2. Supporting a flexible low-carbon energy system	700	1,500	1,500	-	-	-
3. Enabling the financing of the transition	8,734	800	800	78,967	79,220	76,967
4. Tackling emissions from waste and promoting a circular economy	110	90	90	-	-	-
5. Leading by example and connecting Londoners with our net-zero ambition	355	355	355	-	-	-
6. Core staffing to support programmes	4,966	5,013	5,014	-	-	-
Total	15,215	7,858	7,859	78,967	79,220	76,967

5.2. The budget allocated to this delivery plan is presented in the GLA: Mayor budget 2025-26 approved on 31 March 2025 under [MD3330](#) as below:

	Revenue			Capital		
	2025-26 £000	2026-27 £000	2027-28 £000	2025-26 £000	2026-27 £000	2027-28 £000
Reducing Non-Residential Emissions	13,139	13,088	13,089	-	-	-

5.3. It is proposed that the approved budget is adjusted for this delivery plan to reflect budgets transferring to and from the Reducing non-residential emissions delivery plan in accordance with the GLA's governance process. A summary of the changes is below.

	Revenue			Capital		
	<u>2025-26</u> <u>£000</u>	<u>2026-27</u> <u>£000</u>	<u>2027-28</u> <u>£000</u>	<u>2025-26</u> <u>£000</u>	<u>2026-27</u> <u>£000</u>	<u>2027-28</u> <u>£000</u>
<u>Budget transfers to/from other delivery plans:</u>						
<u>Budget transfer to:</u>						
Upgrading London's Infrastructure	(1,775)	(1,775)	(1,775)	-	-	-
<u>Budget transfer from:</u>						
Improving London's Housing Stock	3,440	990	990	78,967	79,220	76,967

Delivering a greener, more climate resilient London	311	311	311	-	-	-
Core	100	100	100	-	-	-
Total Transferring	2,076	(374)	(374)	78,967	79,220	76,967
Core Corporate	-	(4,856)	(4,856)	-	-	-
Net Change	2,076	(5,230)	(5,230)	78,967	79,220	76,967

- 5.4. The budget set out at paragraph 5.1 reflects the net effect of these proposed budget transfers as per the explanations in paragraphs 1.20 to 1.23.
- 5.5. The budget commitments for future years are subject to the annual budget setting process.
- 5.6. Any further transfers and movements within the budget for this programme, or between this and other programmes, will be managed in accordance with the GLA's governance processes.

6. Legal comments

- 6.1. Under section 30(1) of the Greater London Authority Act 1999 (the GLA Act), the Mayor acting on behalf of the GLA has the power to do anything that he considers will further any one or more of the GLA's principal purposes, which are:
- promoting economic development and wealth creation in Greater London
 - promoting social development in Greater London
 - promoting the improvement of the environment in Greater London.
- 6.2. In deciding whether or how to exercise the general power in section 30(1), section 30(4) of the GLA Act requires the GLA to have regard to the effect which the proposed exercise of the power would have on:
- the health of persons in Greater London
 - health inequalities between persons living in Greater London
 - the achievement of sustainable development in the UK
 - climate change, and the consequences of climate change.
- 6.3. Where the GLA exercises the power under section 30(1), pursuant to section 30(5) it must do so in the way which it considers best calculated to:
- promote improvements in the health of persons in Greater London
 - promote the reduction of health inequalities between persons living in Greater London
 - contribute towards the achievement of sustainable development in the United Kingdom
 - contribute towards the mitigation of, or adaptation to, climate change, in the United Kingdom.

- 6.4. The GLA must also make arrangements with a view to securing that in the exercise of the power in section 30(1) there is due regard to the principle that there should be equality of opportunity for all people in accordance with section 33 of the GLA Act and consult with such bodies or persons as the GLA may consider appropriate in this particular case in accordance with section 32 of the GLA Act.
- 6.5. Under section 34 of the GLA Act, the GLA, acting by the Mayor, the Assembly, or both jointly, may do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any functions of the GLA exercisable by the Mayor; or, as the case may be, by the Assembly, or by both acting jointly. The foregoing sections of this report indicate that the decisions requested of the Mayor concern the exercise of the GLA's powers under section 30 and section 34 of the GLA Act.
- 6.6. Under section 38 of the GLA Act, any function exercisable by the Mayor on behalf of the GLA may also be exercised by a member of the GLA's staff – albeit subject to any conditions that the Mayor sees fit to impose. To this end, the Mayor may make the requested delegations to the Assistant Director, Environment and Energy, subject to the conditions and requirements set out in this Mayoral Decision.
- 6.7. Section 31 of the GLA Act places limits on the general power and prohibits the GLA from incurring expenditure on anything which may be done by TfL, MOPAC or the LFC.
- 6.8. In taking the decisions requested of him, the Mayor must comply with the PSED contained in section 149 of the Equality Act 2010. To this end, the Mayor should have particular regard to section three (above) of this report.
- 6.9. If the Mayor makes the decisions sought, officers must also ensure that:
- no reliance is placed on, nor commitments made in reliance of:
 - third party funding until legally binding commitments are secured for it and officers are satisfied that their proposed use of the same aligns with any conditions of award
 - future budgets remaining subject to the outcome of the budget setting process for future financial years, until those budget setting exercises are completed
 - “returned funding” without confirmation that it can be used as proposed and, where applicable, liaising with third party funders and varying current GLA funding agreements to reflect the reallocation of funding
 - where applicable, the Subsidy Control Act 2022 is complied with.
 - where expenditure concerns:
 - purchase of services: they are procured in accordance with the GLA's Contracts and Funding Code (the Code) and where applicable the Procurement Act 2023 (the Act); officers liaise with Transport for London's procurement and supply chain team, which will determine the detail of the procurement strategy to be adopted in accordance with the Code and the Act; and officers put in place appropriate contractual documentation and ensure it is executed by the chosen service provider and GLA before the commencement of those services
 - the award of grant funding, such awards are made fairly, transparently, in accordance with the GLA's equalities requirements and with the requirements of GLA's Contracts and Funding Code and funding agreements are put in place between and executed by the GLA and recipients before any commitment to fund is made.
- 6.10. The extent to which decisions are sought which involve the making of commitments which extend beyond the current Mayoral term, officers must ensure that the terms of all agreements entered into concerning such commitments do not have the effect of fettering the discretion of any successor administration, considering in particular the London elections taking place in May 2028. Accordingly, officers must ensure that all agreements which involve making such commitments include a GLA right

to terminate at any point for convenience (at no cost to the GLA) and are managed in such a manner, and any services, supplies, works deliverables, milestones and/or output requirements are structured so as to mitigate risks of the GLA incurring abortive expenditure (which might be reasonably be taken to fetter, practically, the exercise of such discretion).

- 6.11. If the Mayor makes the decisions sought, the Assistant Director, Environment and Energy must comply with the obligations set out in The Openness of Local Government Bodies Regulations 2014 when taking decisions in accordance with the delegations set out in this decision form. In particular regulation 7 which provides that where a decision has been delegated to an officer either (a) under a specific express authorisation or (b) under a general authorisation and the effect of the decision is to award a contract or incur expenditure which, in either case, materially affects the GLA's financial position, the officer to whom the delegation has been made must produce a written record of the decision (regulation 7(1) and (2)). Regulation 7(3) provides that the written record must be produced as soon as reasonably practicable after the decision has been taken and must contain the date the decision was taken, a record of the decision taken with reasons, details of options considered and rejected, if any, and where a decision is delegated under a specific express authorisation, any conflicts of interest. Regulation 8 provides that the written record, together with any background papers, must as soon as reasonably practicable after the record is made, be made available for inspection by members of the public including on the GLA's website.

7. Planned delivery approach and next steps

- 7.1. Timelines are as set out in the delivery plan appended as Appendix 2.

Appendices and supporting papers:

Appendix 1 – Reducing Non-Residential Emissions mandate

Appendix 2 – Reducing Non-Residential Emissions delivery plan

Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? NO

Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form – NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Megan Life has drafted this report in accordance with GLA procedures and confirms the following:

✓

Sponsoring Director:

Philip Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

Mayoral Adviser:

Mete Coban has been consulted about the proposal and agrees the recommendations.

✓

Advice:

The Finance and Legal teams have commented on this proposal.

✓

Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 3 November 2025.

✓

CHIEF FINANCE OFFICER:

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

Signature:

Fay Hammond

Date: 8 December 2025

CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

Signature:

D. Bellamy

Date: 5 December 2025