MAYOR OF LONDON

London Plan
Integrated Impact Assessment
Draft Scoping Report

December 2025

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1 Introduction

Purpose of this Document

1.1 The Mayor is preparing a new Spatial Development Strategy (SDS) for London which will guide how the city grows and evolves over the next 25 years, with a strong emphasis on good growth: development that is sustainable, inclusive, and future-proofed. The proposed scope of the Integrated Impact Assessment (IIA) of the new SDS for London is detailed in this Scoping Report.

1.2 The Greater London Authority Act 1999 (as amended) (GLAA 1999) places responsibility for strategic planning in London on the Mayor and requires them to produce a SDS for London (also known as the London Plan) and to keep it under review. Section 41 of the GLA Act 1999 outlines the Mayor's duty to ensure that strategies contribute to: sustainable development in the United Kingdom; health of Londoners; equality of opportunity; reduction of health inequalities; and climate change mitigation and adaptation.

1.3 Under regulation 7 of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, SDS are required to be accompanied by a sustainability appraisal, and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) require a Strategic Environmental Assessment (SEA)—often combined with other assessments into an Integrated Impact Assessment (IIA). This fulfils the sustainability appraisal function.

1.4 The IIA approach addresses the Mayor's legal duties to carry out a comprehensive assessment of the new London Plan and its proposed policies with one integrated process The IIA includes Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), Health Impact Assessment (HIA), Community Safety Impact Assessment (CSA), and Equalities Impact Assessment (EqIA). In addition, information from the parallel workstream of the Habitats Regulation Assessment (HRA) will inform this IIA but be reported separately.

1.5 This Scoping Report is being published for consultation as the first of five stages of the IIA. It provides the following detail:

- Key facts about the London Plan, including the geographical area and timeframe
- Proposed approach to the IIA
- Review of plans, policies, programmes and legislation relevant to the IIA
- Key environmental, social, and economic baseline data relevant to spatial planning
- Identification of key sustainability issues for London and implications for the SDS
- Establishing draft objectives for the IIA and the framework for appraising likely significant effects
- Overview of next steps in the IIA process

Scoping Report Consultation

1.6 Consultation on the Scoping Report is aimed at ensuring that the IIA process will be comprehensive and robust in supporting the emerging London Plan. In addition to consulting the statutory environmental consultation bodies designated in the SEA regulations (Natural England, Historic England and the Environment Agency) this Scoping Report is also being published for wider consultation to enable other environmental, social and economic consultees to scrutinise the approach.

1.7 Comments are invited on how the evidence gathering and proposed IIA framework could be improved or clarified. In particular:

- **Question 1** Have there been any significant omissions of plans, policies, programmes or sustainability objectives relevant to the scoping of the IIA?
- **Question 2** Is the baseline data collated relevant and of sufficient detail to support the IIA, or is there additional key baseline data that could be used that has not been identified?
- **Question 3** Do you agree with the key sustainability issues that have been identified for London?
- **Question 4** Do the IIA objectives and assessment questions provide a sound framework against which to assess the sustainability performance of the emerging London Plan?

1.8 The consultation on this Scoping Report is open for six weeks from **19 December 2025 to 30 January 2026**. All responses must be made in writing and submitted to:

Email: londonplan@london.gov.uk

Post: London Plan Team, Greater London Authority, City Hall, Kamal Chunchie Way, London, E16 1ZE

1.9 The Scoping Report aims to provide sufficient information to key stakeholders on the proposed approach to the IIA for the London Plan. Following consultation, any necessary revisions will be made to the IIA framework and other parts of the Scoping Report as appropriate. The results of the IIA will be described in a full IIA report that will be published at the same time as the draft new London Plan in early Summer 2026. A full public consultation process of 12 weeks minimum will be undertaken for both documents and stakeholders and the public will be provided with the opportunity to comment on the IIA Report.

The London Plan

1.10 The London Plan outlines the parameters for London's growth, including homes and job numbers, housing delivery targets for boroughs, and a range of strategic policies – with which the boroughs' Local Plan policies must be in general conformity. The current London Plan was adopted in March 2021.

1.11 The current London Plan is shaped by the overarching objective of good growth. This is defined as growth that is socially and economically inclusive and environmentally sustainable. This forms the foundation of the entire Plan and guides sustainable development in London with the aim of improving health, reducing inequalities, and

creating a sustainable, inclusive city by addressing housing shortages, spreading economic benefits, reducing car dependency, and using technology to improve everyday life and living standards.

1.12 Building on these foundations, the new London Plan will include a spatial strategy that will serve as the overarching policy for growth, including broad locations for growth to meet London's identified needs and associated strategic infrastructure requirements. The detail of specific sites, including Green Belt release if required, and amount of development (other than for housing) will be developed at borough level through the Local Plan Process. The new London Plan will also include thematic policies focused on refreshed good growth objectives.

1.13 The new London Plan is being developed in a significantly different context than the current London Plan, most notably the requirement set by national government to plan for 87,992 new homes per year. This is a level of housing delivery that has not been neared since the 1930s. This scale of growth will inevitably lead to some impacts. Planning for this level of housing growth alongside all of London's other development needs must be done in the most sustainable way, but nonetheless this will still create pressures that require choices and trade-offs.

1.14 The growth challenges faced by London can be tackled by applying different approaches and policy levers, various combinations of which will result in different spatial patterns of development. For example, national policy requires London to explore the potential release of parts of the green belt for development. As part of preparing the new London Plan, high level spatial development options will be tested to assess strategic land use alternatives for London.

1.15 Changes to the National Planning Policy Framework (NPPF) focused on streamlining plans across the country have been announced and are subject to consultation - but it is noted that these will likely constrain in some respects. Furthermore, there are a range of challenges that are outside of planning but nonetheless impact on the context in which the new London Plan and its policies are being developed. For example, supply side challenges (e.g. construction costs and labour supply), funding requirements (e.g. for affordable housing and transport infrastructure) and wider macroeconomic factors (e.g. higher interest rates and economic uncertainty).

1.16 The new London Plan will cover a period of 20 years from adoption (estimated 2028), and this will also be the timeframe for the IIA. The **spatial scope** refers to the geographic area that will be covered by the IIA. The London Plan applies to the Greater London Authority (GLA) administrative area and this is the principal spatial scope for the IIA. The IIA will also take account of potential impacts on adjoining areas as appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions. The key geographic areas within the GLA boundary are defined by the individual London boroughs and the areas of central, inner, and outer London.

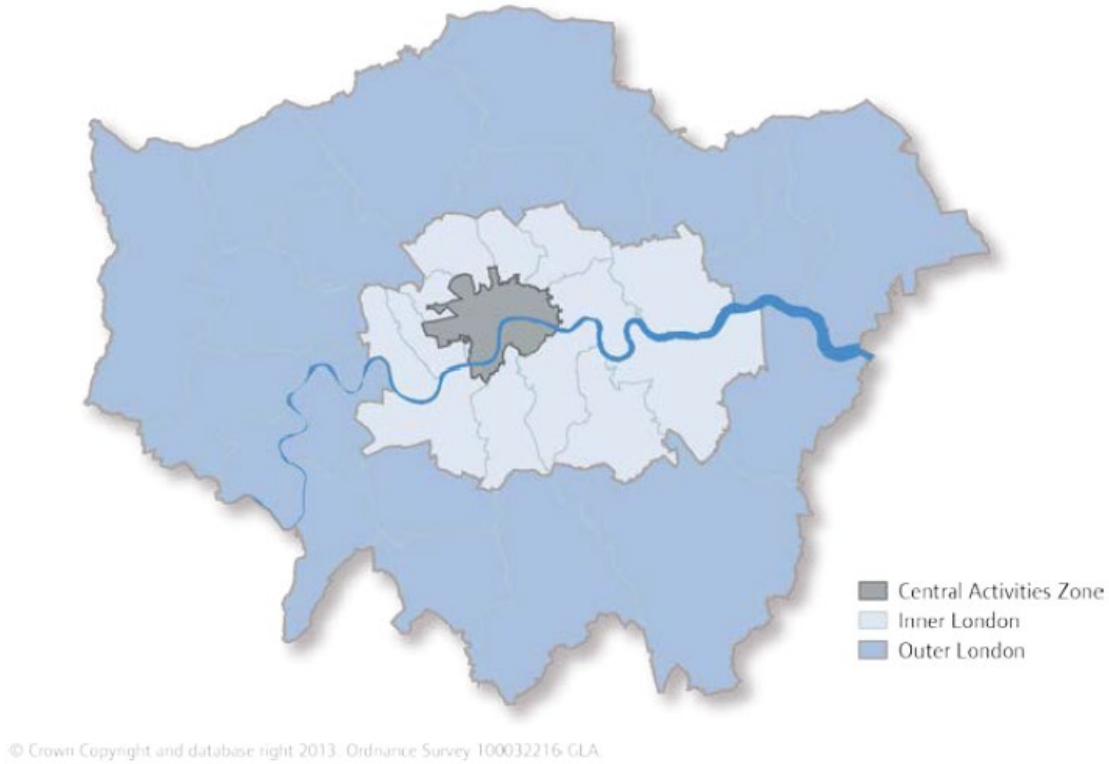


Figure 1 GLA administrative area showing central, inner and outer London

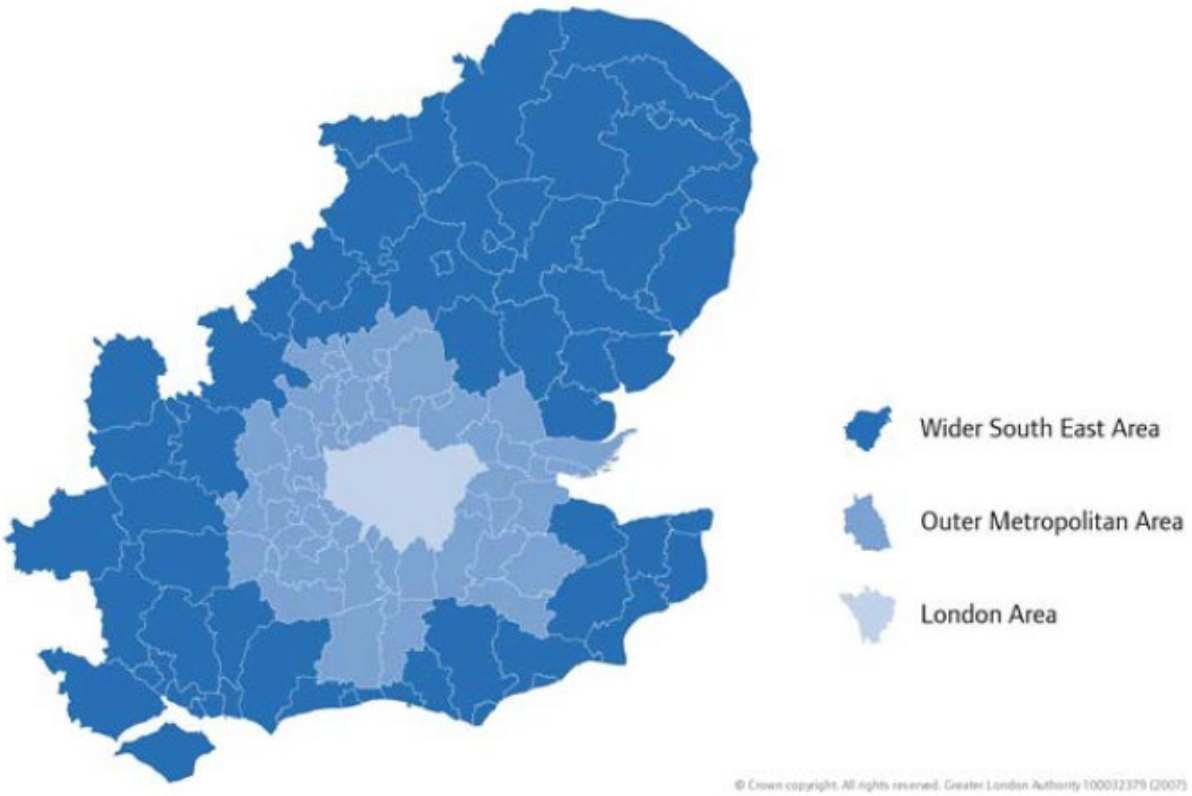


Figure 2 London and surrounding authorities in the outer metropolitan area and wider south east area

Proposed Approach to the IIA

1.17 The purpose of the IIA is to promote sustainable development through better integration of sustainability considerations into the development of the London Plan. It brings together a number of assessments of the social, environmental, and economic impacts of planning under a single framework. It fulfils the statutory requirements to undertake a Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA), Equality Impact Assessment (EqIA), Health Impact Assessment (HIA), and Community Safety Assessment (CSA). The approach to IIA ensures that commonalities, inter-related issues and synergies between the required assessments are identified in a systematic manner.

1.18 The Mayor is required to undertake a **Strategic Environmental Assessment (SEA)** of any his plans and programmes that are considered to have significant effects on the environment under the European Directive 2001/42/EC (known as the SEA Directive). The purpose of the Directive is to ensure that environmental considerations are integral to the preparation and adoption of the plan or programme. The SEA Regulations require an environmental report to be prepared, and made available to the public, which identifies, describes and evaluates the likely significant effects on the environment of implementing the strategy and the reasonable alternatives taking into account the objectives and the geographical scope of the strategy.

1.19 A **Sustainability Appraisal (SA)** is required under the Planning and Compulsory Purchase Act 2004. It is based on the principles of SEA but is wider in focus and covers the other key considerations of sustainability that concern social and economic issues. The process of SA incorporates SEA for the purposes of the Environmental Assessment of Plan and Programmes Regulations 2004.

1.20 The Mayor and GLA have general public body duties under equalities legislation and like all public bodies, have statutory duties to promote equality arising from the Equality Act 2010. The Mayor and the GLA also have an additional duty to promote equality of opportunity arising from the GLA Act 1999 (as amended). **An Equalities Impact Assessment (EqIA)** forms an integral part of the IIA to demonstrate how potential impacts of the London Plan on equality have been considered. In accordance with the Act, the EqIA considers relevant protected characteristics as follows:

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

1.21 Under Section 41 (4) of the GLA Act, the Mayor has a duty to have regard to the impact of his strategies on the health of people in London and health inequalities between them. Section 30 of the GLA Act also confers a general duty for the Greater London Authority

to exercise its power in a way which promotes improvements in health and reductions in health inequalities, including mitigation of any negative effects. A **Health Impact Assessment (HIA)** s a means of assessing the likely health effects of plans, programmes and projects. It seeks to inform and enhance the decision-making process, making decisions more holistic and robust by:

- Highlighting practical ways to enhance the positive health, health equality and well-being effects of a plan.
- Avoiding or reducing the negative health, health inequality and well-being effects.

1.22 **Community Safety Assessment (CSA)** identifies likely significant effects on crime and safety. There is a statutory requirement for the GLA to follow Section 17 of the Crime and Disorder Act 1998. Section 17 places a duty on the GLA to have due regard, when preparing plans and strategies, to the likely effect of these plans and strategies on, and the need to do all that it reasonably can, to prevent crime and disorder in its area. The Police and Justice Act 2006 broadened the scope of Section 17 to encompass misuse of drugs, alcohol and other substances, anti-social behaviour and behaviour adversely affecting the environment.

1.23 The IIA is an iterative assessment process informing the London Plan as it develops. Through the IIA process, the potential significant effects of emerging policies on social, economic, environmental, and health factors are identified and assessed, and mitigation opportunities proposed. The IIA informs decision-makers about the environmental and sustainability consequences of the proposed London Plan policies which can then be considered alongside financial, technical, political and other concerns.

1.24 The **methodology for the IIA** will follow the staged approach of SA/SEA, as summarised in Figure 1. The key output of the first stage (Stage A) is this Scoping Report. The initial scoping stage sets the context and baseline, identifies other relevant plans and programmes, defines the IIA objectives and defines the framework for the assessments

Figure 3 Stages of the IIA process

2 Relevant Plans, Policies, and Programmes

2.1 A plan or programme may be influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. The first stage of the scoping process requires the identification of plans, policies, and programmes relevant for the London Plan and IIA process, their objectives and targets, and analysis of their implications for the London Plan.

2.2 The review of relevant plans, policies and programmes considers the international, national, and regional context within which the review of the London Plan will take place. **Appendix A** provides a summary of those considered most relevant to the London Plan as of June 2025, presented by key themes.

2.3 It is important to note that the policy framework at the national level is constantly, with the National Planning Policy Framework (NPPF) last updated in December 2024 and consultation on a revised version of the NPPF published in December 2025. The Planning and Infrastructure Bill is also in the final stages of progressing through UK Parliament. The Bill aims to reform the UK's planning system and streamline the approval process for major infrastructure projects. It is a key part of the government's plan to address the housing shortage and accelerate infrastructure delivery. As these continue to evolve they will need to be taken into account as the new London Plan is prepared.

2.4 Key **Mayoral strategies** include:

- Culture Strategy for London 2018
- London Growth Plan 2025
- London Environment Strategy 2018
- London Health Inequalities Strategy 2018
- London Housing Strategy 2018
- Mayor's Equality, Diversity and Inclusion Strategy 2018
- Mayor's Transport Strategy 2018

2.5 The review of relevant plans, policies, and programmes identified a number of key themes in terms of their objectives relating to sustainability within the context of the London Plan and preparation of a spatial development strategy. These are reflected in the Key Issues identified in Chapter 4.

3 Baseline Information

3.1 The baseline information is the starting point to help ensure a robust assessment of the potential effects (positive or negative) of the new London Plan policies as they are developed, as well as assessing reasonable alternative policy approaches. The baseline establishes the current state of the environmental, social, and economic characteristics which are likely to be affected by the London Plan, and their likely evolution without implementation of new policies.

3.2 The SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004 list a number of elements that should be considered including biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationships between these factors. Data has been collated and analysed for the required SEA elements alongside data for topics relevant to the SA, HIA, EqIA, and CSA components of the IIA.

3.3 A summary of the baseline information across all IIA topics is set out in **Appendix B,** organised by key themes. The data has been drawn from existing relevant environmental, social, and economic information from a range of sources both quantitative and qualitative. Together, the baseline information provides an overview of the sustainability characteristics of the London Plan area.

3.4 The baseline is constantly evolving and will be subject to change over time as and when new information becomes available. Where there are data gaps in relation to specific issues, further information to address these gaps will be sought on an ongoing basis and the baseline updated where necessary. The London Plan Annual Monitoring Reports cover the Key Performance Indicators (KPIs) defined in the London Plan, and includes additional data and narrative about how the plan is performing against the Good Growth objectives and social, environmental and economic impacts as well as reporting any unanticipated equalities impacts.

3.5 GLA City Intelligence publishes State of London Reports, which aim to provide the most comprehensive and up-to-date picture of London's economic and social realities. The latest report was published in June 2025 and brings together over 100 datasets organised by 11 themes with the aim of informing the work of the Mayor, the London Assembly, and stakeholders in London. In additional to providing open access to over a thousand datasets, the London Datastore also compiles data into thematic evidence bases including Equality, Diversity and Inclusion; Social; and Economic Fairness.

4 Key Issues

4.1 Through the review of both the relevant plans, policies, and programmes (Chapter Two) and the baseline information (Chapter Three), key social, economic, and environmental issues and challenges have been identified. The broad challenges identified along with implications and opportunities for the London Plan are set out below, grouped by topic. It should be noted that some challenges naturally overlap more than one topic, however, to ease navigation this is not represented below.

Population Growth and Demographic Change

4.2 Following a temporary decline during the COVID-19 pandemic, London's population has continued its long-term pattern of growth. London is the youngest and most ethnically diverse region of the UK – half of Londoners are aged 35 or under and 46 percent are of Asian, Black, Mixed or Other ethnicities. While London's population is getting younger, the number of children is decreasing as a share of overall residents. Over the last decade, most inner London boroughs saw large decreases in the number of younger children (aged 0-10). In line with national trends, the population is also aging with an increasing proportion of over 65s.

4.3 London has historically experienced very high levels of migration and mobility (population churn), with large net international inflows offset by similarly large net domestic outflows. These demographic characteristics create differing requirements for economic and social infrastructure. Projected substantial population growth coupled with its changing composition will lead to increased pressure and competition for land for different types of development.

Climate Change Mitigation and Adaptation

4.4 London's climate is changing, bringing more frequent and severe extreme weather events. Floods, droughts, and heatwaves have cost the city millions of pounds in recent years and harmed the health of many Londoners – particularly those in the most vulnerable communities. Despite having the lowest carbon emissions, the poorest and most disadvantaged Londoners are disproportionately exposed to climate risks, are more sensitive to their impacts, and have less capacity to adapt and respond. They are also less likely to live in areas that benefit from interventions that reduce risk, such as urban greening. Changing demographics such as an aging population also increase the number of potentially vulnerable people.

4.5 The increasing pace and scale of climate change makes adaptation both more pressing but also more complex. London is currently not meeting the Mayor's CO2 emissions targets to reach net-zero by 2030. A key part of achieving net zero is increasing clean energy generation and making London's buildings more energy efficient. Upgrading London's existing energy system (including by generating more energy locally) will be key to achieving net zero There is an urgent need to further reduce emissions from transport and buildings. Actions at the national level are contributing to decarbonisation of energy networks but there is a need to minimise energy demand in anticipation of growing pressure on the future supply of electricity.

4.6 New development will need to be designed to adapt to climate change for the increased likelihood of extreme weather events, overheating as a result of temperature rise, as well as current infrastructure improved to be resilient to climate change. Increasing flood risk, including from surface water due to extreme weather and sea level rise, also needs to be accounted for. London is in an area of water stress and improvements to the way water is managed will need to consider an integrated approach incorporating water quality, water supply, and wastewater alongside reducing flooding to understand and respond to future water-related infrastructure challenges that may impact planned growth. In addition to measures to minimise water use, opportunities for creating blue infrastructure which can both help to manage localised flood risk and simultaneously create new habitats should be encouraged.

Health and Community Safety

4.7 The government's new 10 Year Health Plan prioritises shifting from Sickness to Prevention. There is overwhelming evidence that the built environment impacts on health and health inequalities. Prevention requires addressing wider determinants of health, and those relevant to planning including housing (good quality, affordable, secure), transport (active travel, reducing emissions and air pollution), climate change (mitigation and adaptation) and built environment that enables healthy behaviours (access to healthy diet, green, open and safe space for physical activity).

4.8 While London tends to have better health outcomes than the rest of the UK, stark ethnic and socioeconomic inequalities remain. There is more than 10-years variation in healthy life expectancy between London boroughs, and lower life expectancy broadly correlates with higher deprivation. Londoners are living with complex health needs for longer, resulting in increased pressure on the health sector. The Government's 10 Year Health Plan prioritises shifting care from the hospital to the community. This requires spatial planning to prioritise health infrastructure and housing that supports people with complex needs to live at home.

4.9 The causes of death and long-term conditions prevalent in London are driven by risk factors such as obesity, physical inactivity and air pollution, which in turn are influenced by the built environment. Half of London's adults are overweight or obese, and over one third of Year 6 children in London are classified as overweight or obese. Obesity is higher in the most deprived areas, among unemployed and disabled people, and in some ethnic groups. There are large populations of people in inclusion health groups (e.g. homeless people, asylum seekers and refugees, and Gypsy, Roma and Traveller communities) living in London. People in these groups experience greater risk of poor health and complex health challenges.

4.10 Londoners are not breathing clean air. Despite significant progress, London still exceeds the World Health Organization's (WHO's) recommended health-based guidelines and air pollution from road transport remains an important source of emissions. Impacts of poor air quality do not fall equally across the city; poorer and Black, Asian and Minority Ethnic communities are affected more severely. Younger and older people are particularly vulnerable to the effects of air pollution: every school in London is in an area that exceeds the WHO-recommended guidelines.

4.11 London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can

impact London's economic competitiveness and tourism. Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations, and disproportionately affects specific socio-demographic groups, including young Black men, men in general (except for domestic violence where women are most affected), and people with disabilities.

Equality of Opportunity

4.12 Despite being the richest city in the UK, London also has the most people in poverty. Around 1 in 5 Londoners live in relative poverty (after housing costs), and a third of children in London live in poverty, and one child in 21 is homeless and living in temporary accommodation. There is a clear pattern that Londoners living in the most deprived areas have poorer outcomes compared with those living in the least deprived areas across various measures (e.g. neighbourhood relationships, trust and social isolation). Experience of poverty, alongside health, wider socio-economic background, housing provision and the ability to engage with the educational system, all impact Londoners' ability to fulfil their potential and gain full access to the employment opportunities the city has to offer.

4.13 While London has world-leading levels of public transport connectivity, including to some of the highest concentrations of employment density in the world, there are imbalances within London. For example, in connectivity between inner London and outer transport hubs and more suburban areas; and between south and north London. The level of connectivity available also varies by who is travelling, with only about one third of the London Underground network currently providing step-free access.

4.14 Poverty and deprivation are important predictors of loneliness and act as major barriers to social integration. Londoners experience more social isolation than people in other regions of the UK, and loneliness is particularly prevalent among older people. Actively participating in culture, sport and leisure activities is important to wellbeing. Young Londoners from minority ethnicities and lower socio-economic background are more likely to have issues in accessing sports and physical activity, healthy food, and positive mental health.

4.15 Access to diverse local services and living in a safe neighbourhood are also important to wellbeing. Some groups of Londoners are more likely to be concerned about crime and safety in their area. LGBT+ Londoners, mixed ethnicity Londoners, and Jewish Londoners tend to be more likely to feel hate crime is a problem in their area. Disabled Londoners, females, and Sikh Londoners are least likely to feel safe walking alone after dark. Fear of crime can be a barrier to walking or using public transport, and more generally can be stressful and limit people's access to activities and contribute to social isolation.

4.16 Parents in London struggle to find childcare to a greater extent that in other parts of the country, and this is particularly the case in more disadvantaged areas. This shortage of childcare is particularly acute for parents of a child who is disabled or has special educational needs, or for parents who work atypical hours. While the total number of children in London's primary schools has been falling since around 2016, an increase in housing delivery could have implications for this trend.

4.17 London's disadvantaged and marginalised communities suffer disproportionately from poor housing. Black, Asian and ethnic minority Londoners are more likely than others to live in homes which are poorly insulated or do not meet the Decent Homes Standard, or in buildings with unsafe cladding, as are Londoners on low incomes and with disabilities

or long-term conditions. Across London, 13% of people are disabled (using the definition under the Equality Act 2010), with higher prevalence in more deprived neighbourhoods.

Biodiversity and Ecosystem Services

4.18 Objectives of a range of policies and plans at different levels focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. Sites, from those designated with the very highest level of protection, to those areas at the local level, are threatened by a range of issues such as habitat loss, human encroachment, poor management practices and invasive species.

4.19 Changes in air and water quality along with a changing climate can also change distribution of species and habitats within these sites. While increasing access to nature has positive outcomes for wellbeing, increased accessibility or proximity of development to designated sites also has the potential to adversely affect them indirectly. While green and blue spaces make up 52 per cent of London's surface area, too many communities still lack access to high-quality green spaces. Our waterways and rivers remain polluted, limiting their ability to support biodiversity and provide much-needed spaces for recreation and wellbeing.

4.20 New development and climate change put pressure on sites designated for nature conservation and wider green infrastructure – biodiversity stress is caused by noise, pollution, weather and climate, water scarcity and human disturbance. There are however potential benefits associated with development linked to requirements to deliver Biodiversity Net Gain (BNG).

4.21 Biodiversity needs to become part of development policy on sustainable communities, urban green space and the built environment, and this should be reflected in policies to promote biodiversity conservation and enhancement, opportunities for local planning, design and operation to integrate biodiversity and the network of green spaces and green infrastructure to provide a range of sustainability benefits, i.e. healthy living, improving air and water quality, cooling the urban environment, service resilience, enhancing biodiversity and ecological resilience.

Best Use of Land and Resources

4.22 The new London Plan will need to accommodate higher housing and growth targets than before, bringing forward significant additional sources of capacity for housing and economic development including consideration of Green Belt release. Pressure for development and competition between different land uses is increasing, and without careful management could lead to unsustainable pattens of development and inefficient use of land.

4.23 Competing pressures for land also impacts on the ability to provide necessary social, physical, and environmental infrastructure to support the growing population. The urgent need for housing growth will need to be successfully balanced with green space and optimising the potential of existing capacity within existing urban and previously developed areas with associated benefits for land remediation.

4.24 London's aging infrastructure requires substantial investment and modernisation to meet economic growth, housing delivery, net zero and climate resilience goals. Upgrades are

required across all infrastructure sectors – transport, energy, water, data infrastructure and digital connectivity. Public transport improvements are essential to enable greater densities of development while maintaining liveability. The new London Plan will need to realise opportunities to coordinate locations for growth with sustainable infrastructure connections to employment, leisure, school and community facilities. This represents a means of seeking both to reduce the need to travel, as well as encourage modal shift to sustainable travel modes.

4.25 Increased levels of development impact on the consumption and availability of finite resources including water, energy and mineral derived materials. The amount of materials and waste produced is also likely to increase with increased population growth if there are no additional measures to help reduce it. There are increased opportunities from the circular economy approach to reduce the decarbonise supply chains, minimise waste, support the circular economy, increase recycling and manage waste sustainably. Measures to protect, manage and conserve water resources and water (river and groundwater) quality should also be maximised.

Successful Placemaking

4.26 London's built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. London's heritage assets and historic environment make a significant contribution to the city's culture by providing easy access to the history of the city and its places. Recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. However, the importance and significance of heritage and character can be challenged by pressure for development resulting in the loss or erosion of the integrity of character assets and related views and settings.

4.27 The scale of development required to meet housing targets and other growth needs is likely to drive rapid and substantial change in places across the capital which could risk the erosion of place distinctiveness/sense of place. New development needs to be well-designed to create the right conditions for successful adaptation and intensification, to deliver sustainable and inclusive growth. As the scale and density of development increases, the importance of integrating quality design, place-making and green spaces increases. The new London Plan will need to balance the imperative for delivery with commitments to housing quality and provision of public space, social infrastructure and liveable neighbourhoods that support physical and mental health outcomes.

4.28 New development plays a crucial role in shaping places by ensuring that high streets, town centres, and other areas are vibrant, safe, and inclusive both during the day and at night, and supporting a thriving nighttime economy. High streets and town centres are particularly important to local communities, accommodating 41 per cent of all of London's businesses, and providing access to a range of goods, services, social functions and cultural activities at different times of the day and night. Public spaces and buildings need to be designed to foster accessibility and inclusivity, as well as community cohesion and interaction, with a high standard of amenity for both existing and future users.

4.29 There are marked contrasts in the quality and character of places across London. Place disparities and uneven access to public goods can be exacerbated by poor co-ordination of growth and infrastructure. For example, car dependence and dominance has an impact on liveability and other sustainability issues relating to health, climate change and best use of land. There is a need to embed placemaking principles through all development so

that the design challenges of the built/natural environment and public realm are consistently addressed across London.

Housing

4.30 The housing need figure of 87,992 homes per year for London set by the national government represents a significant increase from the current London Plan target of 52,000 new homes per year. There is an even bigger gap when compared to actual delivery which was c. 32,000 in 2024-25. The current delivery environment has resulted in steep falls in housing starts, completions and planning applications. This is the result of macroeconomic factors (chiefly higher inflation and higher interest costs) that have been compounded by long-trend structural and regulatory factors.

4.31 Without significant intervention, housing pressures are likely to persist. Population growth and economic recovery will continue to drive demand, while constraints on delivery—such as high construction costs, viability challenges, and financial pressures on providers—may limit supply. Affordability challenges are expected to remain acute, with mortgage rate volatility and high rents continuing to strain household budgets. Lack of affordable housing is also holding back London's economy and potential for further growth.

4.32 Affordability pressures exist across all tenures, and London is becoming less accessible for families with children, key workers and marginalised Londoners. The human and financial cost of homelessness and temporary accommodation – leaving one in 21 London children temporary accommodation – is significant. Nearly 12, 000 people were seen sleeping rough in London in 2023-24 and London boroughs spend £4 million each day on temporary accommodation. The health impact of temporary accommodation, particularly on children, is known to be substantial and.

4.33 The affordability, quality and security of housing is all key to health and an increase in the supply of social and other affordable housing is fundamental to improving health and health inequalities. Eight years after the Grenfell tragedy more than a third of high-rise buildings with unsafe cladding are yet to start remediation works; fourteen per cent of privately rented homes in London fail to meet the Decent Homes Standard, along with eight per cent of homes in the social rented sector; and 210,000 homes a year need to be made more energy efficient if London is to reach net-zero by 2030. Changing household characteristics and wider demographic trends raise housing suitability (both size and design) issues.

Economic Potential and Employment

4.34 London's economy rebounded strongly directly after COVID, but growth has generally been modest and uneven across sectors. High-value sectors (such as information and communications, education, professional and technical services) have generally outperformed, while sectors that rely on physical interaction have seen weaker recoveries. Sectoral changes in workforce jobs have had similar shifts to those in sectoral output shares. Falling productivity remains a concern.

4.35 London's working age population is relatively highly qualified, however recent years have seen significant shifts in the supply of labour at all skill levels. While incomes are higher in London, so is income inequality. In-work poverty is a growing problem in London. There are twice as many Londoners in poverty in working households than in workless ones. A

quarter of London's workforce (1.32 million people) regularly work at night (between 6pm and 6am). London's night-time economy is a key element of London's culture however music venues, creative studios, pubs and clubs that make London such a dynamic creative capital continue to be at risk.

4.36 London's economic activity is primarily focused in the Central Activities Zone, town centres, high streets, and industrial areas in terms of the provision of physical floorspace needs. The agglomeration benefits of being based in London are a key feature of its success, and specialist clusters are an important aspect of London's economy. However, London's infrastructure capacity constraints limit growth. While hybrid and flexible working patterns have become normal in many sectors, uncertainties remain about the impact on the agglomeration of activities in London and the demand for infrastructure.

4.37 Without sufficient provision of employment and business space in terms of type, location and cost, there is a threat to London's position as a leading global city as well as the ability of local economies to serve local populations. There is a need to both support the well-established sectors that are recognised as economic strengths, as well as the high-growth sectors that are injecting significant investment and dynamism into London's economy. However, increasing demand from energy-hungry services like data centres, artificial intelligence and life sciences risks crowding out other uses or limiting economic growth in innovation sectors if not properly planned for and accommodated.

4.38 Although demand remains strong for premium office space in the Central Activities Zone and key clusters, other important economic locations, including many local town centres and high streets, are struggling in a changing economic context. London's local SMEs play a key role in generating employment opportunities and sustainable growth in the areas of the economy that provide the goods and services essential for everyday life. Access to affordable work and studio space, including appropriate light industrial facilities, is a core challenge in London. Although London's industrial land and manufacturing base in an important growth opportunity, the supply of industrial land has been decreasing.

5 Proposed IIA Framework

5.1 A key element of the IIA process is the determination of IIA objectives. The IIA objectives have been derived from an analysis of the environmental, economic, social, health, and equalities issues identified. The eight proposed IIA objectives are:

1. **Make the best and most efficient use of land and resources, reducing the negative impact of London's social and economic activity on people and the environment.**
2. **Provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet evolving household needs.**
3. **Unlock and sustain London's economic potential across all parts of the capital ensuring stable long-term economic growth.**
4. **Create successful, well served, mixed use and dynamic places, ensuring new development promotes and enhances sense of place, having regard for the specific vulnerabilities of cultural, historic, landscape and geodiversity assets.**
5. **Improve the health, community safety and wellbeing of Londoners and reduce health inequalities**
6. **Promote greater equality of opportunity for all and meet diverse needs to achieve a more inclusive, integrated, and fair city.**
7. **Reduce CO2 emissions from all sources and create a more resilient city in the face of climate change impacts.**
8. **Conserve and enhance biodiversity, protecting designated species and habitats and supporting nature recovery and resilience and provision of wider ecosystem services.**

5.2 This forms the framework against which emerging options and policies in the Plan will be assessed, to ensure that they have positive impacts economically, environmentally, and socially including health and equalities. The objectives reflect the sustainability objectives the London Plan should be aiming to achieve and the areas of sustainability that the London Plan is expected to affect or have an influence on.

5.3 The IIA Framework is a key component in completing the IIA, through providing a set of IIA objectives against which the performance of the London Plan can be predicted and evaluated. The IIA objectives and sub-objectives have been worded so that they reflect a desired direction for the theme concerned. They incorporate externally driven social, environmental and economic objectives as well as others developed specifically in relation to the context of the London Plan.

5.4 Two sets of prompt questions have been developed for each IIA objective to assist with the assessment of the impacts (positive, negative, neutral) of emerging policies and reasonable alternatives. The first set is for assessing the alternatives and final policies in the draft London Plan, while the second lists questions for developing and assessing the different spatial options (spatial components and any alternatives). The prompt questions have been developed through the analysis of baseline information, the emerging evidence base for the London Plan, and identification of key sustainability issues and opportunities. It should be noted that there is a certain degree of cross-over of the questions within the IIA Framework - while some questions may be similar, they are considered from a differing viewpoint and within a different context.

5.5 There may be potential overlap and conflict between different IIA objectives and what they aim to achieve, and these conflicts will be considered when assessing the emerging policies against the IIA objectives (for example, there is some natural potential incompatibility between IIA objectives that require development such as housing provision with environmental objectives or aspects of place-making around character and heritage). This will help to balance the policy approach taken in the plan, or, where certain impacts cannot be prevented, it may help to determine appropriate mitigation relating to specific objectives (for example, economic growth could result in greater waste generation however application of circular economy principles could assist in addressing this).

5.6 It should also be noted that that the identified prompt questions are not the only considerations to be taken into account when determining likely effects arising from the London Plan, as every relevant question cannot be known at this stage and for practicality purposes, we cannot be exhaustive. However, they are intended to provide a useful starting point and a transparent structure to help demonstrate how the assessment of the effects arising from the implementation of the London Plan will be undertaken. As the IIA progresses, they will also help in the development of a set of indicators to be included in the monitoring programme at a later stage of the assessment process.

5.7 The following sections set out the IIA objectives and prompt questions by IIA topic.

IIA Objectives and Prompt Questions for Strategic Policy Development

Topic: Best use of land and resources

IIA Objective 1: Make the best and most efficient use of land and resources, reducing the negative impact of London's social and economic activity on people and the environment.

- Sub-objective 1a: Make best use of land.
- Sub-objective 1b: Make efficient use of resources
- Sub-objective 1c: Reduce negative externalities (past, present, future) of development and associated activity on people and the environment.

Prompt questions: Does the policy…

1. Support densification at a plot and neighbourhood level in areas that are well served or have the potential to be so, by transport and other existing infrastructure?
2. Promote the re-use of previously developed land?
3. Likely require the use of greenfield land?
4. Promote waste management practices in line with the waste hierarchy and support new self-sufficiency?
5. Minimise the use of resources in construction and operation?
6. Ensure the protection of soil resources and quality during construction activities?
7. Protect ground and surface water quality (and the availability of water resources for humans and nature) in line with Water Framework Directive (WFD) requirements?
8. Protect and enhance green and blue infrastructure contributing to mitigation services?
9. Risk exacerbating the impact of wind in the public realm?
10. Promote the remediation of contaminated land and/or restoration of degraded soils?
11. Promote supply and sustainable use of mineral resources?

12. Protect the network of sites safeguarded for waterborne freight use across the capital?
13. Promote supply of burial space to meet the needs of different communities?

See also questions under objectives 5 (health and health inequalities), 7 (climate change mitigation), and 8 (biodiversity and ecosystem services) criteria relating to carbon emissions, pollution, harm and risks.

Topic: Housing

IIA Objective 2: Provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet evolving household needs.

- Sub-objective 2a: Plan for housing quantity sufficient to meet projected and backlog needs, easing competition.
- Sub-objective 2b: Secure a mix of housing that is sufficient to provide choice and best meet needs.
- Sub-objective 2c: Secure an improvement in housing quality that better meets needs.
- Sub-objective 2d: Achieve improved housing affordability that is better aligned with Londoners' incomes.

Prompt questions: Does the policy…

1. Help to facilitate the delivery of net additional housing, minimising loss of existing decent homes?
2. Support increased housing choice in the mix of provision sought that reflects the range of Londoners' needs,
3. Support design that is appropriately adaptable to anticipated future changes in housing needs?
4. Support improved and sustained housing quality in the space and fabric durability sought?
5. Ensure existing residents affected by development have continuity of access and enjoyment of their homes?
6. Promote housing affordability through expected contributions or specifications that will reduce running costs?

See also questions under objectives 5 (health and health inequalities), 6 (equality of opportunity), and 7 (climate resilience).

Topic: Economic Potential

IIA Objective 3: Unlock and sustain London's economic potential across all parts of the capital ensuring stable long-term economic growth.

- Sub-objective 3a: Sustain a diversity of economic activity.
- Sub-objective 3b: Address barriers to economic growth.
- Sub-objective 3c: Address barriers to economic participation.
- Sub-objective 3d: Ensure resilience of economic activity to weather extremes and global economic shocks and change.

Prompt questions: Does the policy…

1. Provide for the spatial needs (land, infrastructure, locational, space) for a diversity of economic activity to (continue to) be met, including appropriate flexibility?
2. Risk disrupting economic activity given the need for development in areas of existing employment?
3. Address barriers to economic growth (e.g. connectivity, infrastructure capacity, space quantum or quality, skills, health)?
4. Harness technological opportunity and/or encourage innovation?
5. Support growth sectors' spatial needs, including the employment-related needs arising from housing growth?
6. Promote activity that will be employment-generating?
7. Address barriers to economic participation or progression (e.g. childcare, affordability, skills, health, access and connectivity)?
8. Support improved resilience to economic change through e.g. through diversification and flexibility?

See also questions under objectives 2 (housing sufficiency), 5 (health and health inequalities), 6 (equality of opportunity and inclusion), and 7 (climate resilience).

Topic: Successful placemaking

IIA Objective 4: Create successful, well served, mixed use and dynamic places, ensuring new development promotes and enhances sense of place, having regard for the specific vulnerabilities of cultural, historic, landscape and geodiversity assets.

- Sub-objective 4a: Create well-served mixed use places that can sustain their success.
- Sub-objective 4b: Ensure new development contributes to the conservation, enjoyment and enhancement of place-based assets.

Prompt questions: Does the policy…

1. Support the development and sustainability of well-served, (by public transport and other infrastructure, including town centres and open space) mixed use places that reduce the need to travel by private car?
2. Support densities and quantities of development that can sustain a range of infrastructure and services?
3. Support the co-ordination of growth and infrastructure provision?
4. Support the creation and maintenance of a safe, accessible, legible and attractive public realm which encourages people to socialise, walk, wheel and cycle?
5. Support existing design quality and neighbourhood distinctiveness, and integration with this, or promote improvements to the quality and distinctiveness of the built environment where this is lacking?
6. Support the conservation and enhancement, and enjoyment (access, affordability, interpretation, understanding) of character assets, appropriately managing direct and indirect risks to their integrity?

See also questions under objectives 5 (health improvement, health inequalities) and 6 (equality of opportunity).

Topic: Health and community safety

IIA Objective 5: Improve the health, community safety and wellbeing of Londoners and reduce health inequalities

- Sub-objective 5a: Improve health and well-being through addressing health and well-being determinants associated with development.
- Sub-objective 5b: Improve community safety, reduce crime and fear of crime through addressing risk factors.
- Sub-objective 5c: Reduce health inequalities by addressing inequalities of causational factors, including spatial.

Prompt questions: Does the policy…

1. Risk increasing air or noise pollution through an increase in emissions-generating activity (transport, economic, incineration, construction)?
2. Risk increasing air pollution, CO2 emissions, and road danger through an increase in private vehicle use?
3. Risk increasing exposure to air pollution, particularly in areas of poorest air quality and through being likely to require development in AQMAs?
4. Help tackle congestion and other causes of poor air quality?
5. Minimise the risk of disturbance (noise, vibration, light dust) during construction and operation?
6. Enhance connectivity between communities?
7. Promote design that supports active travel and recreation, including through improving safety and perceptions of safety?
8. Promote design that incorporates and provides better connectivity and access to natural greenspace?
9. Risk increasing pressure on healthcare capacity?
10. Ensure sufficient and equitable access to healthcare?
11. Promote improved access to social and community facilities, including opportunities for social interaction, for the neighbourhood?
12. Promote design which enhances safety (including fire safety) and feelings of security in respect of buildings, infrastructure and public realm?

See also questions under objectives 2 (housing mix/choice), 3 (barriers to work), 6 (equality of opportunity), and 7 (climate change resilience).

Topic: Equality of opportunity

IIA Objective 6: Promote greater equality of opportunity for all and meet diverse needs to achieve a more inclusive, integrated, and fair city.

- Sub-objective 6a: Secure greater equality of opportunity by reducing disadvantage.
- Sub-objective 6b: Secure greater equality of opportunity by better meeting specific needs.
- Sub-objective 6c: Promote greater equality of opportunity by supporting greater participation in public life or other activities where participation is disproportionately low.
- Sub-objective 6d: Foster inclusion, integration and good relations between different communities
- Sub-objective 6e: Eliminate unlawful discrimination based on protected characteristics

Prompt questions: Does the policy…

1. Encourage inclusive design of buildings, public realm and infrastructure that enables all Londoners to move around and partake in the life of the city, including interacting

with others, addressing barriers to doing so that may be physical, cultural or psychological (e.g. fear).
2. Help secure adequate provision and distribution of services and facilities that meet diverse needs?
3. Ensure people are adequately served by key healthcare facilities, regardless of socio-economic status?
4. Ensure sufficient access to educational facilities for all?
5. Promote access to and provision of appropriate community social infrastructure including playgrounds and sports facilities?
6. Promote equitable access to safe, inclusive and accessible, open spaces, in particular for women and children, older persons and persons with disabilities?
7. Help secure regeneration that will reduce deprivation and improve quality of life for particular communities?
8. Support reductions in poverty (including child, food and fuel poverty), deprivation and disparity across the domains of the Indices of Multiple Deprivation?
9. Help protect the character of particular places linked to the identity and needs of particular groups?
10. Avoid unlawful discrimination?

See also questions under objectives 2 (specific housing mix/choice and affordability, 3 (sustaining existing economic activity and addressing barriers to economic participation), 5 (health inequalities), and 4 (well-served places and sense of place).

Topic: Climate change

IIA Objective 7: Reduce CO2 emissions from all sources and create a more resilient city in the face of climate change impacts.

- Sub-objective 7a: Achieve reductions in CO2 in line with national and regional net zero targets.
- Sub-objective 7b: Improve the climate change resilience of people and places within London.

Prompt questions: Does the policy…

1. Risk increasing emissions through loss or damage to carbon sinks, likely use of carbon intensive construction materials and processes, operation and/or resultant behaviours such as increased traffic?
2. Support the creation of new carbon sinks or restoration of existing carbon sinks such as soils?
3. Support active, efficient and sustainable modes of travel that reduce emissions?
4. Support low carbon circular economy growth sectors (including e.g. CCS) by meeting their spatial needs or helping to grow their markets?
5. Promote the use or generation of renewable and low carbon energy?
6. Encourage reduction in energy use and promote energy efficiency and low carbon operations?
7. Promote low carbon construction including circular economy principles and reuse of carbon intensive materials?
8. Risk increasing surface water flood risk through being likely to require the development of permeable land?
9. Promote SuDs and catchment management approaches including design and provision of appropriate greenfield run off and functional floodplain where loss of these is unavoidable?

10. Risk increasing vulnerability to flood risk by being likely to increase net development in areas of known flood risk?
11. Direct development to areas of least flood risk?
12. Support the delivery of strategic flood risk infrastructure?
13. Risk exacerbating urban heat island by an increase in the net built up area?
14. Promote building, infrastructure and public realm design that is resilient to likely extremes of temperature, rainfall and wind and mitigates wind and heat issues caused by development?
15. Promote design that improves the climate resilience of a wider area beyond the development site?
16. Strengthen the natural environment, including protecting and enhancing existing green infrastructure and introducing new natural spaces and green features in urban areas and buildings?

See also questions under objective 8 (biodiversity).

Topic: Biodiversity and ecosystem services

IIA Objective 8: Conserve and enhance biodiversity, protecting designated species and habitats and supporting nature recovery and resilience and provision of wider ecosystem services.

- Sub-objective 8a: Conserve biodiversity, supporting its resilience.
- Sub-objective 8b: Enhance biodiversity, supporting its recovery.
- Sub-objective 8c: Protect designated habitats and species.
- Sub-objective 8d: Support the provision of wider ecosystem services

Prompt questions: Does the policy…

1. Protect the physical integrity of designated sites including sites of international, national and local importance, including those of potential or candidate designation?
2. Help manage other pressures on designated sites and protected habitat and species, taking on board the HRA findings and recommendations?
3. Promote the conservation and enhancement of London's Nature Recovery Network and priority habitat and species, including through habitat creation and restoration, linked with existing habitats?
4. Conserve and enhance the connectivity and functionality of the green and blue infrastructure network?
5. Support the provision of biodiversity net gain which provides wider ecosystem services benefits, including access to nature?
6. Risk an increase of disturbance from human activity in the vicinity of habitats and species?
7. Provide opportunities to create new and enhance existing wildlife and geological sites?
8. Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?

See also questions under objectives 1 (reducing negative externalities) and 5 (health impacts of development) re indirect effects of development on biodiversity.

IIA Objectives and Prompt Questions for Strategic Spatial Options

Topic: Best use of land and resources

IIA Objective 1: Make the best and most efficient use of land and resources, reducing the negative impact of London's social and economic activity on people and the environment.

- Sub-objective 1a: Make best use of land.
- Sub-objective 1b: Make efficient use of resources
- Sub-objective 1c: Reduce negative externalities (past, present, future) of development and associated activity on people and the environment.

Prompt questions: Will development in this broad location/this spatial option…

1. Achieve densities that will minimise land take overall?
2. Present the opportunity to remediate and reuse [contaminated] brownfield land and/or make better use of under-used buildings/structures/spaces/land/infrastructure?
3. Present the opportunity to improve the operational resource efficiency of existing infrastructure and buildings?
4. Avoid development of the best and most versatile agricultural land?
5. Present the opportunity to reduce harmful runoff and improve WFD water body status?
6. Integrate with regional environmental improvement or resource management planning to help realise strategic improvements?

See also questions under objectives 5 (health and health inequalities), 7 (climate change mitigation), and 8 (biodiversity and ecosystem services) criteria relating to carbon emissions, pollution, harm and risks.

Topic: Housing

IIA Objective 2: Provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet evolving household needs.

- Sub-objective 2a: Plan for housing quantity sufficient to meet projected and backlog needs, easing competition.
- Sub-objective 2b: Secure a mix of housing that is sufficient to provide choice and best meet needs.
- Sub-objective 2c: Secure an improvement in housing quality that better meets needs.
- Sub-objective 2d: Achieve improved housing affordability that is better aligned with Londoners' incomes.

Prompt questions: Will development in this broad location/this spatial option…

1. Provide the opportunity to deliver additional housing (directly, or indirectly through unlocking)?
2. Involve the loss of existing housing, or affect existing housing quality?
3. Provide the opportunity to diversify existing housing stock?
4. Provide the opportunity to help regenerate and bring new investment to existing areas where this has been lacking, eroding housing quality?
5. Be sufficiently viable or backed by other delivery mechanisms to ensure delivery of housing quality and affordable housing?

See also questions under objectives 5 (health and health inequalities), 6 (equality of opportunity), and 7 (climate resilience).

Topic: Economic Potential

IIA Objective 3: Unlock and sustain London's economic potential across all parts of the capital ensuring stable long-term economic growth.

- Sub-objective 3a: Sustain a diversity of economic activity.
- Sub-objective 3b: Address barriers to economic growth.
- Sub-objective 3c: Address barriers to economic participation.
- Sub-objective 3d: Ensure resilience of economic activity to weather extremes and global economic shocks and change.

Prompt questions: Will development in this broad location/this spatial option…

1. Retain well-located industrial land or other land that meets specific business-related needs?
2. Avoid the loss or other disruptive impact on employment floorspace or land currently in use by businesses?
3. Provide the opportunity for a variety of businesses to [better] meet their needs or improve [e.g. energy] efficiency?
4. Provide the opportunity to deliver housing that better meets specific workforce or consumer needs?
5. Provide new opportunities for employment-generating activity e.g. by way of new customers or spaces attractive to growth sectors?
6. Have good access to or improve access to jobs or training facilities?
7. Provide the opportunity to address infrastructure constraints on growth or resilience?
8. Support innovation in the facilities to be provided or challenges to be overcome?
9. Support regeneration in areas experiencing the effects of economic change?
10. Help futureproof an area to economic change in use and economic diversification and flexibility of spaces?

See also questions under objectives 2 (housing sufficiency), 5 (health and health inequalities), 6 (equality of opportunity and inclusion), and 7 (climate resilience).

Topic: Successful placemaking

IIA Objective 4: Create successful, well served, mixed use and dynamic places, ensuring new development promotes and enhances sense of place, having regard for the specific vulnerabilities of cultural, historic, landscape and geodiversity assets.

- Sub-objective 4a: Create well-served mixed use places that can sustain their success.
- Sub-objective 4b: Ensure new development contributes to the conservation, enjoyment and enhancement of place-based assets.

Prompt questions: Will development in this broad location/this spatial option…

1. Provide the opportunity to diversify the mix of uses and facilities in the area?
2. Provide the opportunity to integrate transport and land uses?
3. Provide the opportunity to enhance access (and where relevant address deficiencies in) to infrastructure and open space in the area through its scale, density and location?

4. Provide the opportunity to create new character and distinctiveness where this is currently lacking?
5. Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of development?
6. Present the opportunity to improve the condition of, access to and/or enjoyment of character assets?
7. Provide the opportunity to integrate with existing neighbourhoods/settlements without undermining their distinctiveness?
8. Conserve tranquil areas free from visual intrusion, noise, light pollution etc?
9. Protect rights of way, common land, open spaces, views etc where they contribute to local character?
10. Protect the integrity of designated and undesignated character assets either directly or through avoiding impacts on their setting, key views or ability to implement a relevant management plan?

See also questions under objectives 5 (health improvement, health inequalities) and 6 (equality of opportunity).

Topic: Health and community safety

IIA Objective 5: Improve the health, community safety and wellbeing of Londoners and reduce health inequalities

- Sub-objective 5a: Improve health and well-being through addressing health and well-being determinants associated with development.
- Sub-objective 5b: Improve community safety, reduce crime and fear of crime through addressing risk factors.
- Sub-objective 5c: Reduce health inequalities by addressing inequalities of causational factors, including spatial.

Prompt questions: Will development in this broad location/this spatial option…

1. Be likely to increase problematic air and/or noise pollution arising from traffic and operations?
2. Have good access or present opportunities to improve access to areas free from traffic and rail noise
3. Present opportunities to reduce exposure to air pollution and noise and vibration, including for vulnerable people and communities?
4. Present opportunities to improve access to and safety of travel networks and the public realm?
5. Involve the (qualitative or quantitative) net loss of active recreational facilities?
6. Have good access to or present opportunities to improve access to and safety of active recreational facilities/opportunities?
7. Have good access or present opportunities to improve access to and connectivity of natural green space?
8. Have good access to or present opportunities to improve access to healthy food?
9. Have good access or present opportunities to improve access to health and social care facilities?
10. Have good or present opportunities to improve connectivity between communities and to key facilities?
11. Have good access or present opportunities to improve access to other social infrastructure including places of social interaction?

12. Provide the opportunity to integrate with existing housing, promoting social mixing and community cohesion?

See also questions under objectives 2 (housing mix/choice), 3 (barriers to work), 6 (equality of opportunity), and 7 (climate change resilience),

Topic: Equality of opportunity

IIA Objective 6: Promote greater equality of opportunity for all and meet diverse needs to achieve a more inclusive, integrated, and fair city.

- Sub-objective 6a: Secure greater equality of opportunity by reducing disadvantage.
- Sub-objective 6b: Secure greater equality of opportunity by better meeting specific needs.
- Sub-objective 6c: Promote greater equality of opportunity by supporting greater participation in public life or other activities where participation is disproportionately low.
- Sub-objective 6d: Foster inclusion, integration and good relations between different communities
- Sub-objective 6e: Eliminate unlawful discrimination based on protected characteristics

Prompt questions: Will development in this broad location/this spatial option…

1. Create opportunities to improve access to opportunity for particular communities through improved connectivity (new transport links or routes across barriers) and/or facilities or employment provision?
2. Present opportunities to meet a more diverse range of needs than can currently be met locally, in the housing, facilities and employment opportunities that could be accommodated and barriers to access and participation that can be addressed?
3. present opportunities to secure regeneration that will benefit particular communities who live or work in the vicinity?
4. have the potential to affect the place-based identity of particular groups?

See also questions under objectives 2 (specific housing mix/choice and affordability), 3 (sustaining existing economic activity and addressing barriers to economic participation), 4 (well-served places and sense of place), and 5 (health inequalities)

Topic: Climate change

IIA Objective 7: Reduce CO2 emissions from all sources and create a more resilient city in the face of climate change impacts.

- Sub-objective 7a: Achieve reductions in CO2 in line with national and regional net zero targets.
- Sub-objective 7b: Improve the climate change resilience of people and places within London.

Prompt questions: Will development in this broad location/this spatial option…

1. Likely involve a reduction of CO2e emissions-intensive activity (intensive agriculture, artificially maintained grass)?
2. Present opportunities to create new carbon sinks or enhance the effectiveness of existing sinks?

3. Present opportunities to reuse embodied carbon (reuse of buildings/structures or materials)?
4. Need significant additional (embodied) carbon intensive infrastructure (roads, flood defences, rail, buildings) needed to connect and accommodate growth in this broad location?
5. Be well connected by public transport or capable of being so from committed schemes?
6. Be accessible by sustainable modes to/from a range of destinations reflecting work and life needs?
7. Present the opportunity to improve the accessibility by sustainable modes for a wider area?
8. Present opportunities to harness or connect to efficient and resilient local zero carbon heat or power sources in this location e.g. heat networks?
9. Avoid areas of flood risk including functional floodplain and catchment storage?
10. Present the opportunity to reduce flood risk to existing development?
11. Present the opportunity to improve the resilience of the wider area to extremes of heat or wind?

See also questions under objective 8 (biodiversity).

Topic: Biodiversity and ecosystem services

IIA Objective 8: Conserve and enhance biodiversity, protecting designated species and habitats and supporting nature recovery and resilience and provision of wider ecosystem services.

- Sub-objective 8a: Conserve biodiversity, supporting its resilience.
- Sub-objective 8b: Enhance biodiversity, supporting its recovery.
- Sub-objective 8c: Protect designated habitats and species.
- Sub-objective 8d: Support the provision of wider ecosystem services

Prompt questions: Will development in this broad location/this spatial option…

1. Avoid the direct physical loss of protected or other priority habitat and species or erosion of their functionality via severance or fragmentation?
2. Risk indirect physical harm to protected or other priority habitat and species?
3. Present opportunities to integrate with nature recovery regional planning to enhance resilience in a strategic way, promoting new habitat formation or habitat restoration and connection?
4. Present other opportunities to improve the status of designated nature conservation sites?
5. Present other opportunities to enhance biodiversity and the provision of ecosystem services?

See also questions under objective 1 (reducing negative externalities) and 5 (health impacts of development) re indirect effects of development on biodiversity.

Applying the IIA Framework

5.8 Testing the proposed policies in the London Plan against the IIA objectives will use symbol-based scoring system to identify magnitude and significant of effects. and provide a brief commentary explaining and expanding on the scoring. Impacts identified

will be considered relative to their significance as per Figure 4 below. Significance takes into account the magnitude, duration and permanency of the impact, along with consideration of potential secondary and cumulative impacts. For the purposes of this assessment major effects (positive or negative) will be considered significant.

Symbol	Scale of Effect	Significance of Effect
+ +	Major positive effect	Significant
+	Minor positive effect	Not Significant
0	Neutral or no obvious effect	Not Significant
-	Minor negative effect	Not Significant
- -	Major negative effect	Significant
?	Uncertain	

Figure 4 Overview of symbol-based scoring system to identify scale and significant of effect

Appendix A Review of Relevant Plans and Policies

This appendix summarises the analysis of the objectives of the key policies, plans and programmes (including legislation) that are relevant to the preparation of the new London Plan and the IIA assessment process. The key documents and their objectives have been taken into account when drafting the IIA framework.

Inclusion and Safety

The **NPPF** promotes a theme of enhancing healthy and safe communities which is to be achieved by creating places which "promote social interaction (and) enable and support healthy lifestyles." As part of this approach social, recreational and cultural facilities and services that the community needs should be provided guided by planning policies which:

- "plan positively provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services;
- support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- help prevent unnecessary loss of valued facilities and services."

Para 102 of the NPPF states that "Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:

- anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."

With regards to road safety, the NPPF states that "plans should create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones."

Section 17 of the **Crime and Disorder Act 1998** requires all local authorities to exercise their functions with due regard to their likely effect on crime and disorder, and to do all they reasonably can to prevent crime and disorder. The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions.

The **Equality Act 2010** requires public authorities to work to eliminate discrimination and promote equality in all their activities. Under Section 149 of the Equality Act a public authority has a duty to ensure that all decisions are made in such a way as to minimise unfairness, and do not have disproportionately negative impacts on people because of their protected characteristics or background. It protects everyone against unfair treatment, on the basis of protected characteristics:

age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

The Public Sector Equality Duty came into force across Great Britain on 5 April 2011. It means that public bodies have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees. It also requires that public bodies have due regard to the need to:

- eliminate discrimination
- advance equality of opportunity
- foster good relations between different people when carrying out their activities

The **Mayor's Equality, Diversity and Inclusion Strategy (2018)** states that increasing the supply of genuinely affordable homes to rent or buy, and improving social housing and rental standards, will help to support groups that are particularly affected by these issues, including young people, those on low incomes and from BAME groups.

The **Mayor's Police and Crime Plan 2025-2029** sets out his high-level priorities for policing, crime and community safety in London for the period 2025 to 2029.The Mayor's agenda is clear – to make London a safer city for all, by being tough on crime and tough on the complex causes of crime. The key aims of the Plan are:

- Reducing violence and criminal exploitation
- Building safer, more confident communities
- Supporting and overseeing reform of the MPS; and
- Improving the criminal justice system and supporting victims

Implications of the inclusion and safety policies and plans review

Plans and programmes on population and social inclusion include a range of different objectives, including tackling social exclusion, improving human rights and public participation, improving health, and ensuring every child has the chance to fulfil their potential by reducing levels of education failure, ill health, substance misuse, crime and anti-social behaviour. At the regional level, support for cultural diversity and young people are key aims. The Equality Act 2010 is the law intended to achieve equal opportunities in the workplace and in wider society.

The London Plan needs to acknowledge the importance of creating and maintaining a safe and attractive public realm which encourages people to walk and cycle, promoting a sense of place and reducing the need to travel. The London Plan needs to have policies promoting opportunities for education, skills and employment that help all to succeed in life and advance equality of opportunity. The London Plan should seek to ensure provision of goods, services, facilities, public functions, the disposal and management of premises, education and associations, meet the act's requirements.

Health

Spatial planning for health: evidence review (2017) by **Public Health England** (dissolved in 2021) summarised UK evidence, focusing on neighbourhood design, housing, healthier food, natural and sustainable environment, and transport. It concluded that the built and natural environment has a profound impact on health.[1] **Health in Cities (England's Chief Medical Officer's (CMO) Annual Report 2024)** highlights that high building concentration in cities makes it challenging to access good housing, green spaces and a pollution-free environment. It also finds that population health can be improved through the built environment, including tackling the obesogenic food environment, air

pollution and transport emissions.[2] Both reports emphasise the importance of collaboration between health and planning sectors to improve public health by designing healthier built environments.

National Planning Policy (2024; amendment in 2025): A core planning principle is to achieve healthy, inclusive and safe places. Planning policies should "take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs." It calls for planning policies to assess the needs of open space, sports and recreation facilities and opportunities for new provision and requires local planning authorities to take a proactive approach to ensure a sufficient choice of school places is available.[3]

10 Year Health Plan for England (2025) outlines 3 radical shifts: *Hospital to Community; Analogue to Digital; and Sickness to Prevention*. To support the creation of Neighbourhood Health Centres (*Hospital to Community)*, the plan states the need for estates with equipment, working space and technology fit for modern health service requirement. *Sickness to Prevention,* as set out in the 10 year health plan, supports addressing wider determinants of health in the built environment, including infrastructures enabling physical activity (sports facilities, greener safer healthier transport), good quality and warmer homes, and air pollution.[4]

Whilst the **Casey Commission** on adult social care is underway and due to report in 2026,[5] the **Better Care Fund (2025-26)** aims to support people with complex health and care needs living independently at home, through strengthening neighbourhood services across health and care and use of home adaptation.[6]

The **UK Health Security Agency Strategy (UKHSA) Strategic Plan 2023-26** identifies UKHSA's strategic priorities in addition to delivering their core function of protecting health from threats. Strategic priority 4 focuses on health threats in the environment, including the impact of climate change on environmental hazards, and the health impact of adverse weather and air quality (indoor and outdoor).[7]

The Marmot Review: Fair Society, Healthy Lives (2010) investigated health inequalities in England and the actions to tackle them.[8] Subsequently, **Implications for Spatial Planning (2011)** showed there is: 'overwhelming evidence that poor environments contribute significantly to poor health and health inequalities' and highlights three main spatial planning policy actions (which should be applied on a universal basis, but with a scale and intensity that is proportionate to the level of disadvantage):

- 'Fully integrate the planning, transport, housing, environmental and health systems to address the social determinants of health in each locality'
- 'Prioritise policies and interventions that both reduce health inequalities and mitigate climate change by: Improving active travel; Improving good quality open and green spaces; Improving the quality of food in local areas; Improving the energy efficiency of housing'
- 'Support locally developed and evidence-based community regeneration programmes that: Remove barriers to community participation and action; and Reduce social isolation'.[9]

The **Marmot Review 10 Years On (2020)** found that health inequalities in relation to built environment had widened, including air pollution, unhealthy high streets, prioritization of road travel and climate change. Housing cost and homelessness had increased and high levels of non-decent houses in the private rental sector remained.[10]

Mayor of London Health Inequalities Strategy Implementation Plan 2025–2028 sets out the priority actions that the Mayor has committed to taking forward to implement the **London Health Inequalities Strategy** (2018) over the next three years. This includes *Healthy Places*: creating a

stronger foundation through jobs, homes (affordable good quality homes, warmer homes, ending rough sleeping) and the environment (tackling air pollution, greener healthier resilient city).[11]

Evidence Review: Housing and Health Inequalities in London (2022) considers the evidence for housing interventions that support health and reduce health inequalities. Recommendations include: consideration of ventilation, overheating risk, and higher energy efficiency standards in new build housing; raising standards of new homes converted from offices, housing and health colleagues to work together to develop housing offers for people with conditions requiring supported housing. The report also highlighted the shortage of health and social care workers in London that was in part driven by lack of affordable housing for key workers.[12]

Implications of the health and health inequalities policies and plans review

The government's new 10 Year Health Plan prioritises shifting from *Sickness to Prevention*. There is overwhelming evidence that the built environment impacts on health and health inequalities. Prevention requires addressing wider determinants of health, and those relevant to planning including housing (good quality, affordable, secure), transport (active travel, reducing emissions and air pollution), climate change (mitigation and adaptation) and built environment that enables healthy behaviours (e.g., access to healthy diet, green, open and safe space for physical activity). The other shift, *Hospital to Community* with Neighbourhood Health Centres and Services being key aims, requires spatial planning to prioritise health infrastructure and housing that supports people with complex needs to live at home.

The London Plan needs to contribute towards reduction of inequalities in health outcomes and strive to improve the overall physical and mental health and wellbeing of the borough. It must take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs, with particular focus on areas with the poorest health outcomes.

Transport and Connectivity

The **NPPF** requires that "transport issues should be considered from the earliest stages of plan-making". The scale, location and density of development should reflect "opportunities from existing or proposed transport infrastructure". To help reduce congestion and emissions, and improve air quality and public health the planning system should focus significant development "on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

The NPPF also requires that planning policies support an appropriate mix of uses across an area to further help reduce the need to travel as well as the provision of high quality walking and cycling network. While the framework promotes the use and development of sustainable transport networks it also requires that "where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development" should be identified and protected.

The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

The Cycling and Walking Investment Strategy Report to Parliament (2022) sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to

double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP) sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

The **Mayor's Transport Strategy 2018** sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Road transport is the single biggest source of NO2 in London. To address this, the Mayor introduced the world's first 24-hour ULEZ in central London on 8 April 2019 and expanded it to inner London on 25 October 2021. A supplementary proposal was added to it in November 2022. This proposal allowed TfL and the boroughs to seek to address the triple challenges of air quality, the climate emergency and traffic congestion through road user charging schemes, including by expanding the Ultra Low Emission Zone across London. On the 29 August 2023, to bring the health benefits of cleaner air to even more people the Mayor further expanded the ULEZ to cover all London boroughs.

Implications of the transport and connectivity policies and plans review

National transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth. The plans and programmes highlight that congestion and poor air quality resulting from transport are key issues. There is focus on appropriate design, location and layout of development, increasing investment in infrastructure, improving the quality and accessibility of public transport, supporting walking and cycling, and enhancing road safety.

London Plan policies should promote sustainable transport modes, walking and cycling and reduce the need to travel; reduce traffic and congestion; Improve public transport provision including better integration of modes; and enhance accessibility to key community facilities, services and jobs for all, giving regard for older and disabled people.

Heritage and Townscape

Relevant legislation is set out in the overarching **Town and Country Planning Act 1990**, with specific protection for buildings and areas of special architectural or historic interest within the Planning (Listed Buildings and Conservation Areas) Act 1990. **The Ancient Monuments and Archaeological Areas Act 1979** provides specific protection for scheduled monuments.

Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the **Planning (Listed Buildings and Conservation Areas) Act 1990** (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the NPPF and the Local Plan.

The **NPPF** highlights the importance of well designed places, and that design should be inclusive. Of relevance to the approach of the planning system to the historic environment the NPPF contains an objective to contribute to the protection and enhancement of the built and historic environment. The

document also sets out a strategy to seek "the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats." The NPPF also states that Planning policies and decisions should ensure that developments "are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities)@.

Historic England's Advice Notes, Good Practice Advice, and Climate Change strategy provide guidance in relation to the conservation and enhancement of the historic environment. Of particular relevance, the **Historic England Advice Note 4 Tall Buildings** provides advice on planning for tall buildings within the historic environment.

The State of the Environment: Health, People and the Environment (2021) focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

The National Design Guide (2021) sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

Implications of the heritage and townscape policies and plans review

The new London Plan will need to ensure polities help build a sense of place and promote social integration. Historic environment priorities from international to local level include protecting designated resources and their settings (such as listed buildings, conservation areas, scheduled monuments, and registered parks and gardens); recognising the cultural aspects of landscape and establishing mechanisms for their protection against inappropriate development; recognising the potential value of unknown and undesignated resources; and preserving/enhancing sites and landscapes of archaeological and historic interest so that they may be enjoyed by both present and future generations.

The London Plan must ensure that historic environment policies enable the sustainable use of historic buildings, which do not harm or remove their significance. The London Plan must ensure the conservation and protection and enhancement of heritage assets including Listed Buildings, Conservation Areas and Scheduled Ancient Monuments, and their settings.

Housing

The **NPPF** (2024) includes as part of its social objective the promotion of "strong, vibrant and healthy communities" by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Strategic policies should set out the pattern, scale and quality of development and make sufficient provision for housing, including affordable housing). Policies should reflect "the size, type and tenure of housing needed". This policy approach is to include but should not be limited to housing requirements relating to affordable homes, families with children older people, students, people with disabilities, service families, Travellers, those who rent their homes and people wishing to commission the construction of their own homes. Plans must calculate housing need in line with the standard method.

The Homes England Strategic Plan 2023 to 2028 outlines its mission to increase the delivery of affordable and good quality homes, alongside driving regeneration of towns and cities across England. The plan focuses on creating vibrant and successful places, ensuring a sufficient supply of homes,

fostering a resilient housing and regeneration sector, promoting high-quality design, and enabling sustainable homes and places. It emphasizes a place-based approach, working with local leaders and partners to deliver housing-led regeneration, with a brownfield-first approach.

Planning Policy for Traveller Sites (2024) sets out the Government's planning policy for traveller sites. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

The London Housing Strategy (2018) sets out the Mayor's plans to tackle the capital's housing crisis and his vision to provide all Londoners with a good quality home they can afford.

The Mayor's Rough Sleeping Plan of Action 2025 sets the framework for how the Mayor and partners will measure and track progress towards achieving his commitment to end rough sleeping by 2030.

Implications of the housing policies and plans review

National and regional objectives for housing include improvements in longer term housing affordability; high quality housing design and streetscapes; a more stable housing market; improved choice; location of housing supply which supports accessibility and patterns of economic development; and an adequate supply of publicly funded housing for those who need it. Regional strategies focus on the affordability of housing, the quality of housing, and access to services. The housing needs of older people, people with disabilities, people experiencing homelessness, and Gypsies and Travellers are also addressed by national and regional policies. The London Plan needs to include policies on specialist, supported and housing for older people. The London Plan should set targets for sufficient pitches and plots to meet identified needs for Gypsy and Traveller accommodation.

Economic Potential and Employment

The **NPPF** contains an economic objective to "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity." It also requires that planning seeks to "create the conditions in which businesses can invest, expand and adapt" with policies required to "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth". Policies addressing the economy should also seek "to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment." Of particular relevance to London is the requirement for planning policies to "recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations."

Planning policies are also required specifically to address support for the rural economy. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings, while the diversification of the rural economy and promotion of sustainable rural tourism and leisure developments is also supported.

The NPPF also supports the role of town centres as functioning at the heart of local communities. This support is required to provide for a "positive approach to [town centres'] growth, management and adaptation." Included within this support is a requirement to "allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at least ten years ahead."

The Growth Plan 2022 makes growth the government's central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer's "growth plan" contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

Build Back Better: Our Plan for Growth (2021) sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

The Government's Industrial Strategy (2025) contains a range of policy measures ranging from lowering energy prices to speeding up drug approvals. One of the most important messages in the strategy is that the government will focus on accelerating growth for the fastest-growing third of the economy. The government has identified eight sectors – the IS-8 – that it judges have the highest potential for economic growth. They are: advanced manufacturing, the creative industries, life sciences, clean energy, defence, digital and technology businesses (including artificial intelligence and quantum computing), financial services such as banking and insurance, and professional services such as accounting and the legal profession.

Clean Growth Strategy (2018) emphasizes the need to provide growth at a national scale which is clean. "Protecting our built and natural environment is of paramount importance for the future of the country. Protecting our environment is beneficial for our economy and should be seen as an opportunity rather than a constraint. Successfully protecting and enhancing our natural environment will:

- Improve our quality of life.
- Increase our economic prosperity.
- Result in cleaner air.
- Lower energy bills.
- Provide greater economic security.

The report defines Clean Growth as growing natural income while cutting greenhouse gases.

The **London Growth Plan (2025)** is the latest strategic document sets the framework for sustainable, equitable economic development of the capital over the next 10 years. It sets out four targets:

- A 2% rise in productivity per year, which – if achieved – would expand London's economy by an estimated £107bn in 2035, increasing pre-tax income for Londoners by an average £11,000 and contribute an additional £27.5bn to the Treasury.
- Raise earnings for those with the lowest incomes, specifically increasing real household weekly income (after housing costs) of the lowest "20% of Londoners by 20% by 2035".
- The plan recommits to London's target to be net-zero by 2030, with the promise to accelerating plans to meet this major milestone.
- Increase London's standing as a global city, growing London's services exports by an average of 6% per year.

Implications of the economic potential and employment polices and plans review

The improvement and maintenance of high and stable levels of economic growth and employment are key aims of the national strategies. Other objectives include improvements to the education system to increase the skill levels of both children and adults; and improved productivity and innovation,

particularly with regards to technology. At a regional level, emphasis is placed on improvements to the cultural and visitor economy; inward investment; and the use of Information and Communications Technology (ICT) to improve efficiency and skills. The London Plan policies will need to encourage economic growth across the whole plan area and take account of changing economic conditions and requirements to support local businesses and enterprises.

Air Quality

The **Clean Air Strategy (2025)** focuses on improving air quality through decisive actions, addressing both outdoor and indoor air pollution, and emphasizes the need for strategic funding and leadership. It adopts legally binding international targets to reduce emissions of five of the most damaging air pollutants (fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide, non-methane volatile organic compounds) by 2020 and 2030. It is now also proposing tough new goals to cut public exposure to particulate matter pollution, as recommended by the World Health Organization.

The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040

The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) provides the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles (ULEVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

Of the key areas in the **25 Year Environment Plan (YEP)** around which action will be focused, of relevance to the Plan in terms of the protection of air quality is: "reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals."

Mayor's Transport Strategy 2018 Mayor of London sets out the Mayor's transport vision and describes how Transport for London (TfL) and its partners, including the London boroughs, will deliver that vision. Road transport is the single biggest source of NO2 in London. To address this, the Mayor introduced the world's first 24-hour ULEZ in central London on 8 April 2019 and expanded it to inner London on 25 October 2021. A supplementary proposal was added to it in November 2022. This proposal allowed TfL and the boroughs to seek to address the triple challenges of air quality, the climate emergency and traffic congestion through road user charging schemes, including by expanding the Ultra Low Emission Zone across London. On the 29 August 2023, to bring the health benefits of cleaner air to even more people the Mayor further expanded the ULEZ to cover all London boroughs.

London Environment Strategy 2018 commits to achieving the WHO (2005) annual mean AQG of 10 µg/m3 of PM2.5 by 2030, a full decade before the new UK legal limits. However, the Mayor is committed to achieving the stricter 2021 WHO AQG of 5 µg/m3 as soon as possible and recognises that more needs to be done to do so.

Implications of the air quality policies and plan review

A number of objectives have been established in relation to air quality. This includes the setting of targets for reducing emissions of specific pollutants to minimise negative impacts on health and the environment. At the sub-regional and local level emphasis is placed on reducing emissions of nitrogen dioxide (NO2) from the transport sector. The London Plan must acknowledge the importance of air

quality to the lives of people who live, work and play in London, as well as the environment. It must also demonstrate possible measures to be put in place to reduce the harmful effects of air pollution on human health and the environment.

Biodiversity and Natural Environment

A requirement of the **NPPF's** environmental objective is that the planning system should contribute to protecting and enhancing the natural environment including helping to improve biodiversity, and using natural resources prudently. In support of this aim the framework states that plans should "identify and map safeguard components of local wildlife-rich habitats and wider ecological networks" and should also "promote the conservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity." The framework requires that plans should take a strategic approach in terms of "maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries".

The **Environment Act (2021)** sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.
- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

The **Environment Bill Policy Statement 2020** introduced new incentives, actions and planning tools to drive further improvements for nature. The Bill introduces a mandatory requirement for Biodiversity Net Gain in the planning system, to ensure that new developments contribute to the recovery of biodiversity and this requirement can also create new green spaces for local communities to enjoy. It also adds a new concept of Local Nature Recovery Strategies. The **London Local Nature Recovery Strategy** is expected to be adopted in early 2026.

The key areas of **the 25 Year Environment Plan (2018)** of relevance in terms of the protection and promotion of biodiversity are recovering nature and enhancing the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Develop a Nature Recovery Network to protect and restore wildlife and provide opportunities to re-introduce species that have been lost from the countryside.
- Achieve a good environmental status of the UK's seas while allowing marine industries to thrive and complete our economically coherent network of well-managed marine protected areas.
- Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
- Support and protect international forests and sustainable agriculture.

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

Working with Nature (2022) discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England's habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

The Green Infrastructure Framework (2023) by Natural England will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future.

The **London Environment Strategy 2018** brings together approaches to every aspect of London's environment, integrating the following areas:

- air quality
- green infrastructure
- climate change mitigation and energy
- waste
- adapting to climate change
- ambient noise
- low carbon circular economy.

Implications of the biodiversity and natural environment policies and plans review

The objectives of policies and plans at all levels focus on the conservation of biological diversity (including a reduction in the current rate of biodiversity loss), and the protection and monitoring of endangered and vulnerable species and habitats. They also emphasise the ecological importance of geodiversity. The integration of biodiversity considerations into all environmental and socio-economic planning is strongly advocated.

Biodiversity needs to become part of development policy on sustainable communities, urban green space and the built environment, and this should be reflected in policies to promote biodiversity conservation and enhancement, opportunities for local planning, design and operation to integrate biodiversity and the network of green spaces and green infrastructure to provide a range of sustainability benefits, i.e. healthy living, improving air and water quality, cooling the urban environment, service resilience, enhancing biodiversity and ecological resilience. This could include both enhancing existing habitats and providing new areas for biodiversity as opportunities arise. The London Plan needs to take the four critical themes into account: conservation; creation; connection; and celebration. The Plan policies will need to be written in accordance with the objectives and requirements set out in the 25 Year Plan and the Environment Act 2021.

Climate Change

The Climate Change Act (2008) sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO2 emission reductions of at least 26% by 2015, against a 1990 baseline. Through the Climate Change Act, the government has committed to: (i) reduce emissions by at least 100% of 1990 levels (net zero) by 2050 contribute to global emission reductions; and (ii) to limit global temperature rise to as little as possible above 2°C. UK emissions were 44% below 1990 levels in 2018. The first carbon budget (2008 to 2012) was met, as was the second (2013 to 2017) and the UK is on track to outperform the third (2018 to 2022). However, it is not on track to meet the fourth (2023 to 2027). To meet future carbon budgets and the 100% target for 2050 it will require the government to apply more challenging measures. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming'.

The Planning and Compulsory Purchase Act 2004 requires that "Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."

The NPPF (2024) contains as part of its environmental objective a requirement to mitigate and adapt to climate change, "including moving to a low carbon economy". It states that "he planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience…and support renewable and low carbon energy and associated infrastructure…Plans should take a proactive approach to mitigating and adapting to climate change…FN: In line with the objectives and provisions of the Climate Change Act 2008."

The document also states that the "planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change." To achieve these aims new development should be planned to ensure appropriate adaptation measures are included (including green infrastructure) and should be designed, located and orientated as to help to reduce greenhouse gas emissions.

The NPPF requires plans to take a proactive approach in adapting to climate change, stating that "Policies should support appropriate measures to ensure the future resilience of communities and

infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure". As mentioned above, local planning authorities should take full account of overheating from rising temperatures. As temperatures increase, there will be more demand for energy used for cooling, and so policies in the Plan should include design measures that minimise overheating and energy demand for cooling.

The NPPF also requires that development is directed away from areas which are at highest existing or future risk of flooding. Where development is required in such areas, the "development should be made safe for its lifetime without increasing flood risk elsewhere." In relation to coastal change in England planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Furthermore, plans should "reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast".

The UK Hydrogen Strategy (2021) sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy.

The Heat and Buildings Strategy (2021) sets out the government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning.

The Carbon Budget Delivery Plan (2023) explains how the government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development
- the impact the package has on sectors of the economy

Powering up Britain (2023) sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan and Powering Up Britain: Net Zero Growth Plan.

The **British Energy Security Strategy (2022)** sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term

The Energy Efficiency Strategy (2012) aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting (2018) sets out visions for the following sectors:

- People and the Built Environment – "to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change…buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate."
- Business and Industry – "UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change."
- Local Government – "Local government plays a central in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate."

The Flood and Water Management Act (2010) sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

Flood and Coastal Erosion Risk Management: Policy Statement (2020) sets out the government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

The updated Thames Estuary 2100 Plan (2023) sets out the link between our high-level aims and objectives and what we need to do to realise them. There are 9 strategic objectives within the Plan:

- Maintain flood defences in line with the flood risk management policies.
- Adapt and improve all existing flood defences by the current deadlines set out in this Plan.
- Accelerate preparations to decide on an end-of-century option by 2040. The preferred option and timeline may change as this Plan adapts to future changes.
- Track indicators of change and review every 5 years. Update this Plan at least every 10 years using an adaptive FCERM (flood and coastal erosion risk management) economic approach, based on monitoring evidence.
- Work together to develop community-led visions for future riversides. These will drive defence upgrades and identify where to deliver wider benefits.
- Embed carbon reduction pathways within this Plan, striving to achieve carbon net zero status.
- Replace habitat lost to sea level rise over the course of this Plan. Support nature recovery and deliver environmental net gain.
- Improve understanding of the link between sea level rise and other sources of flood risk. Use spatial and emergency planning to create resilient communities.
- Share experience, innovation and learning of delivering and reviewing the Thames Estuary 2100 Plan with others planning to mitigate future climate risks.

Underpinning the objectives are two strategic enablers:

- Strategic objective 10 (strategic enabler): develop and put in place a strategy to secure land to deliver the Plan. This will ensure future options remain viable and maximise opportunities for wider benefits.
- Strategic objective 11 (strategic enabler): Develop and put in place a long-term investment strategy for the Plan. This will enable realisation of the financial benefits of an adaptation pathways approach.

The London Surface Water Strategy (2025–30) is a city-wide, coordinated response to the growing threat of surface water flooding across Greater London. Developed by the Flood Ready London partnership, this Strategy sets out a comprehensive plan to enhance the capital's resilience to intense rainfall and urban drainage challenges through systemic, hydrology-led, and community-focused action.

Thames River Basin District Flood Risk Management Plan 2021 to 2027 drives catchment-based delivery in the Thames RBD that offers multiple benefits to communities and the environment. This catchment-based approach is a key part of the Environment Agency's ambition to meet net zero carbon, along with low carbon innovation and carbon offsetting. It is also integral to achieving the Environment Agency's biodiversity net gain targets which support the ambitions of the government's '25 Year Environment Plan'.

The 25 Year Environment Plan (2019) sets out policy priorities with respect to: responding to climate change are using and managing land sustainably; and protecting and improving our global environment. Actions that will be taken as part of these two key areas are as follows:

- Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

The Environment Improvement Plan 2023 for England is the first revision of the 25YEP. It builds on the 25YEP vision with a new plan setting out how they will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

In response to increasing ambition at national and local levels and mounting evidence on the impacts of global heating, in 2022 Mayor Khan brought forward London's net zero target to 2030. He commissioned a report to analyse possible pathways to achieving net zero on that timeline, which modelled four scenarios, identified challenges and opportunities associated with their delivery and the described the likely policies needed to support delivery. The mayor chose the 'Accelerated Green' pathway which balances ambition with deliverability and replaces the trajectory in the previous 1.5°C compatible plan. Among other things, it will require:

- Nearly 40% reduction in the total heat demand of buildings, requiring over 2 million homes and around 250,000 non-domestic buildings to become properly insulated.
- 2.2 million heat pumps in operation in London by 2030.
- 460,000 buildings connected to district heating networks by 2030.
- A 27% reduction in car vehicle kms travelled by 2030.
- Fossil fuel car and van sales ended by 2030 and enforced in line with Government's commitments.

London net zero 2030: An updated pathway responds to the analysis. It explains the key issues, benefits and challenges of the four pathways and why the Accelerated Green pathway is the preferred option for London.

The London Climate Resilience Review July 2024 provides an assessment of London's climate resilience and makes 50 recommendations for action to guide London's preparations for more frequent and intense climate impacts.

Implications of the climate change policies and plans review

Legislation and national planning policy require to drive reductions in greenhouse gas emissions and promote sustainable development that is adapted to the expected range of climate impacts. New development should be designed to adapt to climate change for the increased likelihood of extreme weather events, overheating as a result of temperature rise, as well as current infrastructure improved to be resilient to climate change. The London Plan policies should contribute to meeting the objectives set out within the Climate Change Act 2008.

The London Plan should encourage reductions in CO_2 emissions in line with London net zero by 2030 and promote sustainable growth. The policies should promote energy efficient design for business premises and private houses, encourage the use of low carbon technologies and the development of renewable energy facilities, both as standalone facilities and as part of wider developments. There is a need to encourage the use of renewable energy sources and low carbon technology in the London Plan. There is also a need for the Plan to include policies to assist in directing development to locations at least risk of flooding and help to reduce overall flood risk.

Geology and Soils

The **NPPF** states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing site of geological value and soils, and recognising the economic and other benefits of the best and most versatile agricultural land. Policies should also

prevent new and existing development from "contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution." The document also requires that strategic policies should seek to make the most effective use of land in meeting local requirements making as much use as possible of previously developed or 'brownfield' land. Furthermore policies should "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land".

Safeguarding our Soils – A Strategy for England (2009) sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

Implications of the soils and geodiversity plans and policies review

The London Plan needs to focus on prevention and remediation of environmental damage, including land contamination. There is a need to increase efforts to reduce soil degradation and remediate contaminated sites as well as protect the best quality agricultural land.

Materials and Waste

National Planning Policy for Waste (2014) Sets out detailed waste planning policies and places responsibility on waste planning authorities to ensure that waste management is considered alongside other spatial planning concerns such as housing and transport; recognising the positive contribution waste management can make to developing sustainable communities. This includes preparing Local Plans which identify opportunities to meet the needs of their area.

Our Waste, Our Resources: A strategy for England (2018) aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

The Waste (Circular Economy) (Amendment) Regulations seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

Implications of the materials and waste policies and plans review

Plans and programmes at all levels seek to promote the 'waste hierarchy'. This seeks to prioritise waste management in the following order: reduction; reuse; recycling and composting; energy recovery; and disposal. National level plans and programmes seek to protect minerals resources and promote appropriate after uses for minerals workings. The London Plan should apply principles of circular economy when aiming for waste reduction, reuse, re-manufacturing and recycling in all construction and operational practices and should seek to promote sustainable waste management within the London Plan.

Water Resources and Quality

National water policies are primarily driven by the aims of **the Water Environment (Water Framework Directive) Regulations 2017** which requires prevention of deterioration of all water bodies (groundwater and surface waters) and to improve them with the aim to meet 'good status' or 'good ecological potential' by 2027. It establishes a statutory framework for the protection of groundwater and inland surface water, estuaries, and coastal waters. Key objectives include improving the quality of rivers and other water bodies to 'good ecological status'; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments.

Meeting our future water needs: a national framework for water resources (2020) set the strategic direction for long term regional water resources planning. The framework is built on a shared vision to leave the environment in a better state than we found it and improve the nation's resilience to drought and minimise interruptions to all water users

The national framework marks a step change in water resources planning. The 5 regional water resources groups will produce a set of co-ordinated, cross-sector plans. These plans will:

- address the scale of challenges we face by identifying the options needed in their region to manage demand and increase supply
- realise opportunities from water resources planning by working collaboratively

Water Industry Act (and Water Industry Act 1991) (Envirowise, 2005) covers the control of the supply of water and provision of sewerage services by the water and sewerage undertakers and defines the criteria for disposal of trade effluent.

The Thames Basin River Management Plan (2022) sets out the current state of the water environment; pressures affecting the water environment; environmental objectives for protecting and improving the waters; programme of measures, actions needed to achieve the objectives. It also informs decisions on land-use planning because water and land resources are closely linked.

In terms of planning policy, **NPPF** requires the planning system to contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. National and regional strategies also have a focus on maintaining and protecting the availability of water.

Implications of the water quality policies and plans review

The London Plan should consider setting out approaches to promote the efficient use of water and limit all types of pollution including water pollution. Policies should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The London Plan must include measures to protect, manage and conserve water resources and water (river and groundwater) quality.

Relevant International Level Plans and Programmes

United Nations Paris Climate Change Agreement (2015) is an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

European Energy Performance of Buildings Directive (2018) aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance. Directive (EU)

2018/844 of the European Parliament and of the Council of 30 May 2018 amends Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency.

European Floods Directive (2007) provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

The European Landscape Convention (2002) promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

International Convention on Wetlands (Ramsar Convention) (1976) is an international agreement with the aim of conserving and managing the use of wetlands and their resources.

European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

International Convention on Biological Diversity (1992) is an international commitment to biodiversity conservation through national strategies and action plans.

European Habitats Directive (1992) sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

European Birds Directive (2009) requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

United Nations Declaration on Forests (New York Declaration) (2014) sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

The Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited), aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

The United Nations (UNESCO) World Heritage Convention (1972) promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

The European Convention for the Protection of the Architectural Heritage of Europe (1985) defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

Appendix B Summary of Baseline Data

London is comprised of 32 borough councils and the City of London. It has 34 local planning authorities, each borough and the City of London plus a Mayoral Development Corporation, the Old Oak and Park Royal Development Corporation (OPDC). The region covers almost 160,000 hectares making it the smallest in the UK by land area but with the highest population density (56 people per hectare)[1]. Approximately 52 per cent of London's land is 'green', which includes parks, gardens, trees and other green spaces.[2]. London is the UK's only global city and as such there are closer parallels with other global cities than UK cities. Global cities have a disproportionate impact on their hinterland, patterns of movement and migration, housing markets and economic activity. For example, across Europe it is usually harder to find good housing at a reasonable price in cities with stronger job markets.

A summary of baseline information covering environmental, economic, and social (including health and equalities) conditions is set out in this Appendix as follows:

- London's Demographics
- Health and Wellbeing, Inclusion and Safety
- Transport and Connectivity
- Heritage and Townscape
- Housing
- Economic Potential and Employment
- Air Quality
- Biodiversity and Natural Environment
- Climate Change
- Geology, Soils and Land Use
- Materials and Waste
- Noise and Vibration
- Water resources and quality

London's Demographics

Total population

London's population was 8.8 million in the 2021 census, an increase of 7.7% since the 2011 census. This growth was not consistent across London, with the greatest population growth in the borough of Tower Hamlets (22.1 percent) and population declines in Kensington & Chelsea (- 9.6 percent), Westminster (- 6.9 percent) and Camden (- 4.6 percent). This population increase was second-largest nationally over the decade, behind the neighbouring South East region.

Population growth

The GLA 2024-based population projections take the ONS mid-2024 population estimates as their starting point and project forward using a range of assumptions about based on different future fertility, life expectancy, and migration trend. Projection variants are based on five, ten, and fifteen years of past migration data, with those based on the 15 years of past data giving the highest overall growth for London, and those based on five years giving the lowest. The central projection is based on 10 years of past migration trends.

Figure 5 shows the projected growth of London's population for the three core scenarios of the GLA 2024-based projections. These projections give a range for of London's 2046 population of a 9.9 to 10.3 million, equivalent of annualised growth of 35 to 53 thousand per year, with the central projection estimating a population of 9,949,000 by 2046.

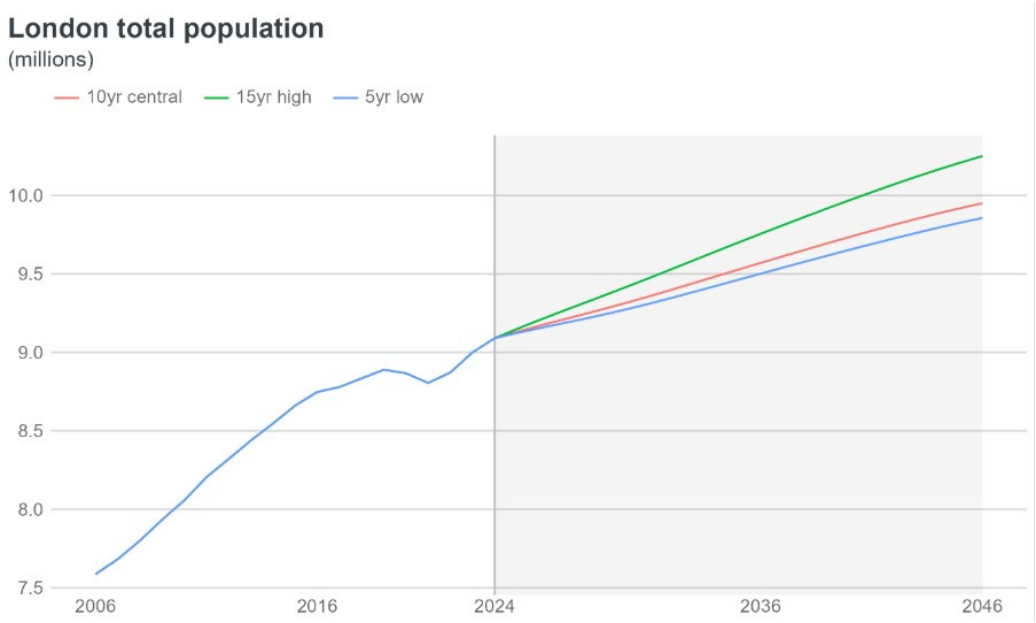
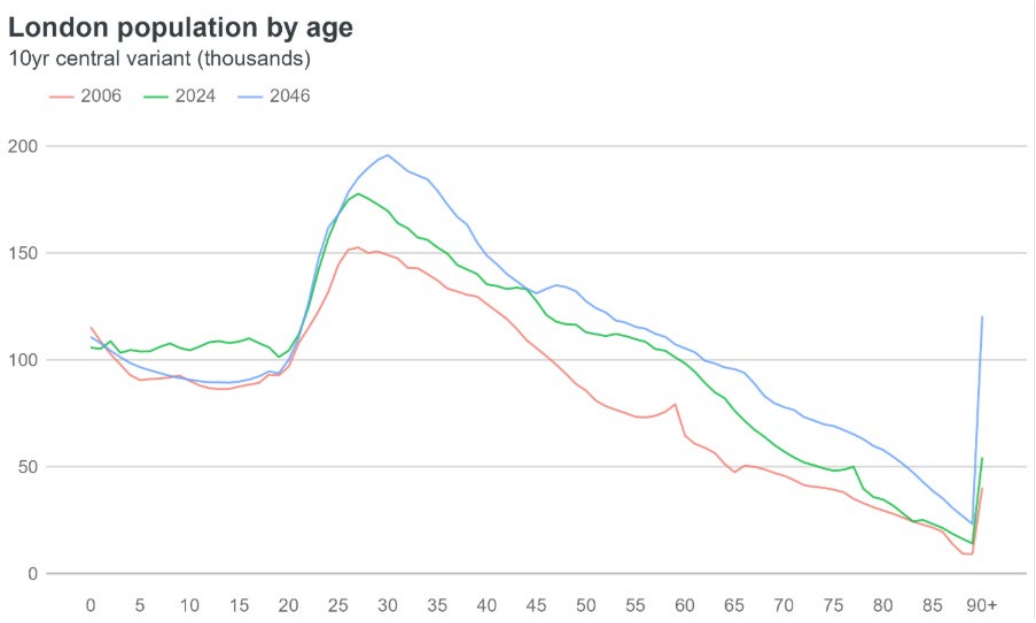


Figure 5 Projected growth of London's population to 2046 for the 10 year central projection, 15 year high projection, and 5 year low projection (Source: GLA draft 2024-based population projections)

The majority of the projected growth is among those aged 25 to 40 and aged 60 and above. The number of children in London is projected to fall back from recent highs, primarily due to a decline in fertility rates since 2012. The population is set to age significantly over the coming decades, with the number of people aged 80 and over projected to more than double.



Figures 6 Projected change in age structure of London's population to 2046 for the 10 year central projection, 15 year high projection, and 5 year low projection (Source: GLA draft 2024-based population projections)

Age Structure

London is a relatively young city, with a median age of 35.9, compared to 41.4 for the remained of England and Wales. Over the past two decades there has been a consistent positive inflow to London of those aged 18-24 and a consistent negative outflow of those aged 25-44 (those most likely to be parents of young children). This is a result of the large numbers of young adults who come to work or study in London and the tendency for Londoners to relocate outside the capital from their mid-30s onwards.

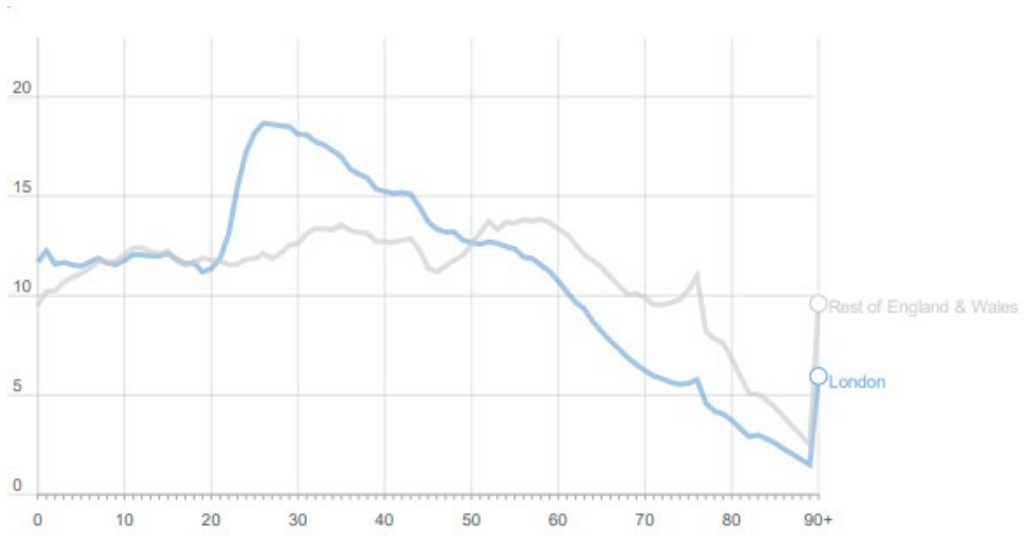


Figure 7 Population age structure. Persons per 1,000 total population, estimates for year ending June 2023 (Source: ONS population estimates for England and Wales)

London's growth is not expected to be evenly distributed between age groups, and changes over the last decade also show spatial variations between Inner and Outer London. While London's population is getting younger, the number of children is decreasing as a share of overall residents. Over the last decade, most inner London boroughs saw large decreases in the number of younger children (aged 0-10). Most outer London boroughs had stable or increased numbers. The degree of change varies between boroughs, from minus 25 per cent in Westminster and Kensington and Chelsea, to plus 23 per cent in Havering.

A relatively small proportion of London's population is over 65, with 9.4 percent in Inner London and 13.6 percent in Outer London compared to the rest of England at 19.8 percent. Nearly a quarter of the population is over 65 in Havering and Bromley.

Migration and natural change

London's population growth is a function of the interplay between international and internal migration and natural change. The number of births in London peaked around 2012 and has since continued to fall despite there being more women of reproductive age. The decline in the fertility rate is greater in Inner London than in the rest of England and Wales, while the decline in Outer London is similar to the national picture. Economic conditions including the cost of housing have been identified as a significant contributory cause for the decline in births and are key push factors for young people and families leaving London.

Based on ONS 2023 mid-year estimate of population (the most recent available), most population growth in the previous year (c. 52,000 of the c. 76,000 total) was due to natural change – the difference between births and deaths. The remainder was accounted for by net migration (the total of

internal and international). An outflow of domestic migrants in London is normal and this has been the case each year for the past two decades. However, excluding the spike in 2021 linked to the COVID-19 pandemic, net outflows are now at their highest level this century.

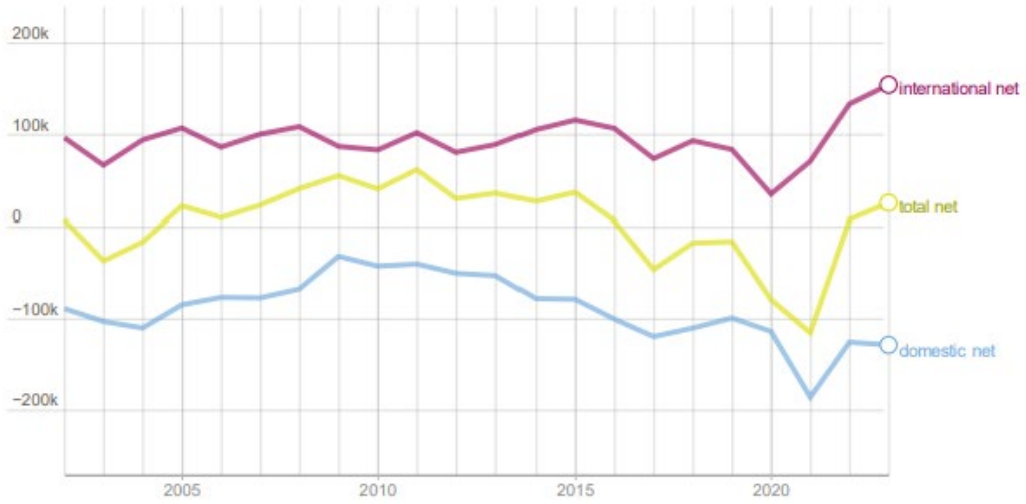


Figure 8 Annual net migration (domestic, international, and total) to mid-2023 (Source: ONS population estimates and GLA modelled estimates)

A high proportion of London's population is made up of individuals and families who moved here from another country. At the time of the most recent census, 41 percent of Londoners were born outside the UK, compared to the UK average of 16 percent.[13] There has been a marked change in immigration since 2021. This can be attributed to the end of free movement for EU nationals, easing of travel restrictions following the COVID19 pandemic, and the war in Ukraine. At over 150,000, the 2023 MYE value for London's net international migration was more than 18% higher than 2022 and represents a considerable increase from 78,000 in 2021. The geographical distribution of new migrants is uneven across London.

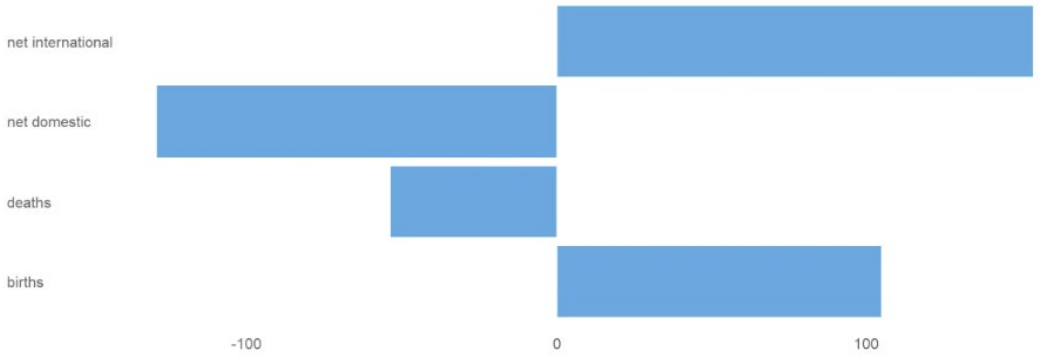


Figure 9 Components of population change (net internal migration, net domestic migration, births, deaths) in London for year ending June 2023 (Source: ONS MYE)

London's net migration balance is very small when compared to its annual population turnover (the sum of flows to and from the region. For the year ending mid-2023 London's total net migration was estimated at +25 thousand and its turnover at 1.13 million. This level of population churn can impact on people's sense of belonging to an area and community cohesion.

Spatial distribution

London boroughs account for the 20 most densely populated areas in the UK. The highest population density in the UK, of 16,500 people per square kilometre, is found in the London Borough of Tower Hamlets. This is followed by Islington with 14,800 people per square kilometre. London's least densely populated borough is Richmond upon Thames, which is 56th of 362 authorities. Policies in the new London Plan will potentially alter the spatial distribution of growth.

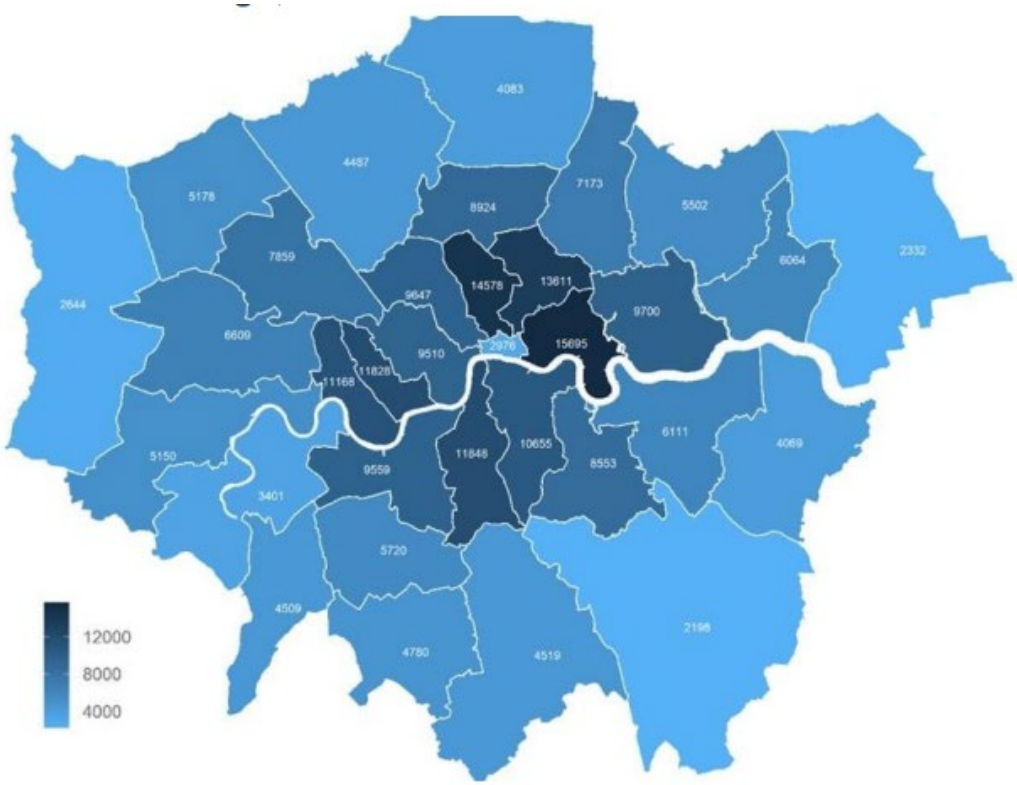


Figure 10 Population density (persons per square km) by London Borough (Source: 2021 Census)

Diversity

London's diversity is one of its biggest assets. There are more than 300 languages spoken in London, and nearly half of all Londoners identify as Black, Asian, Mixed of Other (ONS). Most Londoners exhibit high levels of **belonging** – in the 2021-22 Survey of Londoners, 80 percent felt they belonged to the city, and 73 percent felt the belonged to their local area (with local area defined as being 15-20 minutes walking distance from their home). Feelings of belonging varied by ethnicity, religious belief, and age. For example, older Londoners (82 percent) were far more likely to feel they belonged to their local area than Londoners aged 16-24 (68 percent). At 64 percent, Londoners aged 25-34 reported the lowest levels of belonging.

Around 8 in 10 Londoners (80 percent) agree that their local area is a place where people from different backgrounds get on together. However, Londoners from some of London's under-served communities had lower than average rates of agreement that people from different background get on well in their area. This included Londoners who said they were not proficient in English (66 percent), those not working because of sickness or disability (70 percent), Londoners with no qualifications (71 percent), and those who were digitally excluded (71 percent).

Gender based violence and harassment is common in public spaces and varies from daily microaggressions such as staring and catcalling, to groping, flashing, stalking and more extreme forms

of violence such as rape and abduction. Some 71 per cent of women in the UK have experienced some form of sexual harassment in a public space, with this number rising sharply to 86 per cent among women aged 18–24.[14]

Many Londoners experience unfair treatment because of one or several **protected characteristics**, or because of their social class – 37 percent in the 2021/22 Survey of Londoners. Ethnicity was the more common characteristic, followed by sex. Other than for ethnicity, for each characteristic, there has been no significant change since 2018-19.

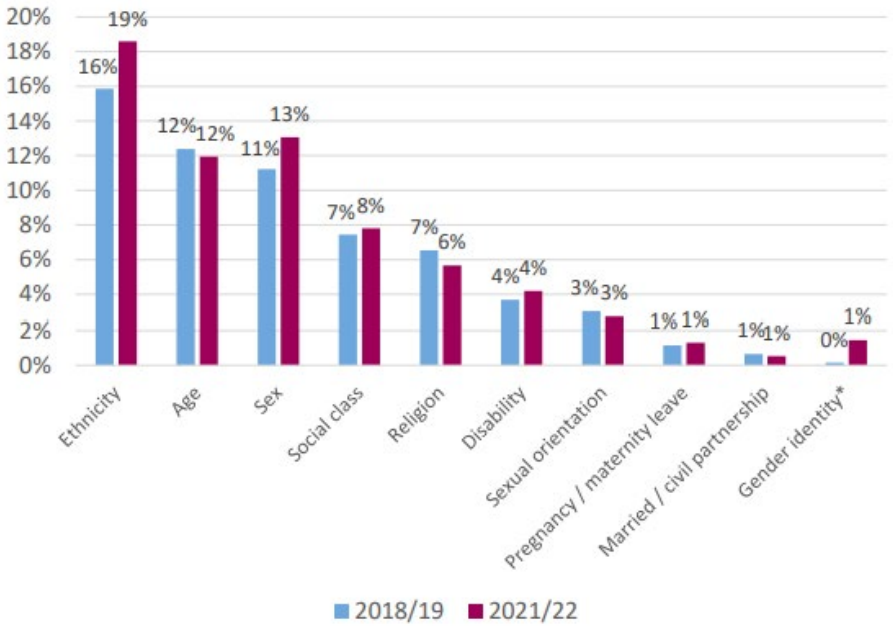


Figure 11 Percentage of Londoners aged 16 and over treated unfairly because of protected characteristic or social class, 2018/19 and 2021/22 (Source: Survey of Londoners)

London is the most diverse region of the UK in terms of race, religion, nationality and sexuality. White groups made up 54 per cent of London's population in 2021. Of the remaining 46 per cent, Asian groups made up 21 per cent, Black groups 14 per cent and Mixed groups 6 per cent and Other ethnic groups 6 per cent.

London has many faiths and beliefs represented within the population. In the 2021 Census, the largest religions were Christianity (40.6 percent), Islam (14.9 percent) , Hinduism (5.15 percent), Judaism (1.65 percent), Sikhism (1.64 percent), Buddhism (1.0 percent), and others (0.9 percent).The number of London residents having no religion is growing, Across London, the percentage of residents who described themselves as having "No religion" increased from 21.0 percent to 27.1 percent.

In the 2021 census, 86 per cent of London's population aged 16 or over identify as being heterosexual or straight, while 4.3 per cent identify as gay, lesbian, bisexual or other sexuality (compared to 3.0 per cent for the rest of England and Wales). The remaining 9.5 per cent did not answer. LGBTQ+ (lesbian, gay, bisexual, trans, queer, +) people are as diverse as other Londoners. As such, their experiences may differ depending on other aspects of their identify. LGBTQ+ Londoners are more socioeconomically polarised than other Londoners, as they are more likely to report both being financially comfortable and in poverty.[15]

The 2021 census also recorded that 0.9 per cent of Londoners aged 16 or over identified with a gender identity different from their sex registered at birth. This compared to 0.5 per cent for the rest of

England and Wales. Of the remainder, 7.9 per cent of Londoners aged 16 or over did not answer the question.

Across London, 13.2 percent of the population is disabled (using the definition under the Equality Act 2010), with this figure varying slightly between boroughs. This compares to 24 percent of the total English population[16]. The characteristics of disabled Londoners highlight the intersectionality between Londoners with disabilities and other groups with protected characteristics. The characteristics of disabled Londoners are as follows: 55 percent are women, 46 percent are aged 65 or over (compared to 9 percent of all Londoners), 84 percent are retired or not working, and 41 percent have a household income of less than £10,000[17].

Some Londoners who share protected characteristics are more likely to experience poverty (after housing costs). The Households Below Average Income report shows that:[18]

- Young Londoners (aged under 24) are more likely to be in poverty than other Londoners (32 percent vs 22 percent)
- Women are more likely to be in poverty than men (28 percent vs 24 percent).
- Disabled people are more likely to be in poverty than non-disabled people (30 percent vs 25 percent). People living in a household where someone is disabled are also more likely to be in poverty than people living in a household where no one is disabled (31 percent vs 24 percent).
- People from Black, Asian and minority ethnic backgrounds are more likely to be in poverty than White Londoners.[19] Eighteen per cent of White Londoners are in poverty, compared with 38 percent of Asian Londoners, 36 percent of Black Londoners, 28 percent of Mixed ethnicity Londoners, and 43 percent of Londoners from an Other ethnic group.

Some Londoners who share protected characteristics are more likely to be unemployed, reflecting structural barriers in the labour market. The ONS Annual Population Survey 2024 sets out that:[20]

- Young Londoners are much more likely to be unemployed: 31 percent of 16-19 year olds, 16 percent of 16-24 year olds, and 13 percent of 20-24 year olds are unemployed.
- Disabled Londoners are twice as likely to be unemployed as non-disabled Londoners (eight percent vs four percent).
- Londoners from some Black, Asian and minority ethnic backgrounds are more likely to be unemployed. Nine percent of Pakistani and Bangladeshi Londoners are unemployed, along with seven percent of Black Londoners, 10 percent of Mixed ethnicity Londoners and nine percent of Londoners from an Other ethnic background.
- Londoners from Muslim, Hindu or any Other religious background are more likely to be unemployed (nine per cent, six per cent and seven per cent respectively) than among all Londoners.

Health and Wellbeing, Inclusion, and Safety

Health, health inequalities, and health infrastructure

The cost-of-living crisis continues to impact on the health of Londoners.[21] Along with shifts in the housing market and escalating climate risk, this has exacerbated ethnic and socioeconomic inequalities in London across education, income and poverty, crime, the built environment. [22] As London responds to the climate emergency, climate risks disproportionately affect the most deprived and disadvantaged

individuals who are both more exposed and more vulnerable to their impacts, with reduced capacity to adapt.[23, 24]

Built, natural and social environment are key determinants of health outcomes.[25] Beyond the headline health data presented here, health outcomes are linked and relevant in other topics in the rest of this report (e.g. housing, transport, air quality and climate change). **Life expectancy** has stalled in London in recent years. A significant proportion of Londoner's life is spent in poor health. [6, 7]

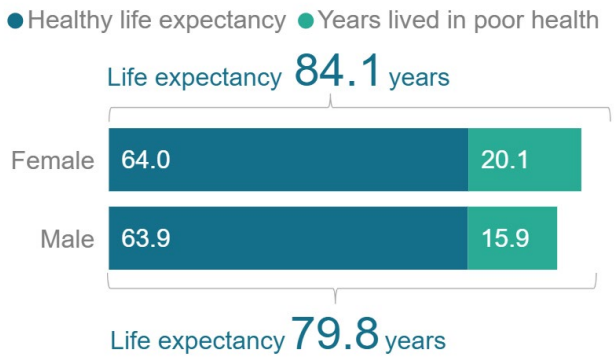


Figure 12 Life expectancy at birth and healthy life expectancy of Londoners, 2021-23.[26,27]

There is more than 10-years variation in healthy life expectancy between London boroughs. Lower life expectancy broadly correlates with higher deprivation.[8, 9]

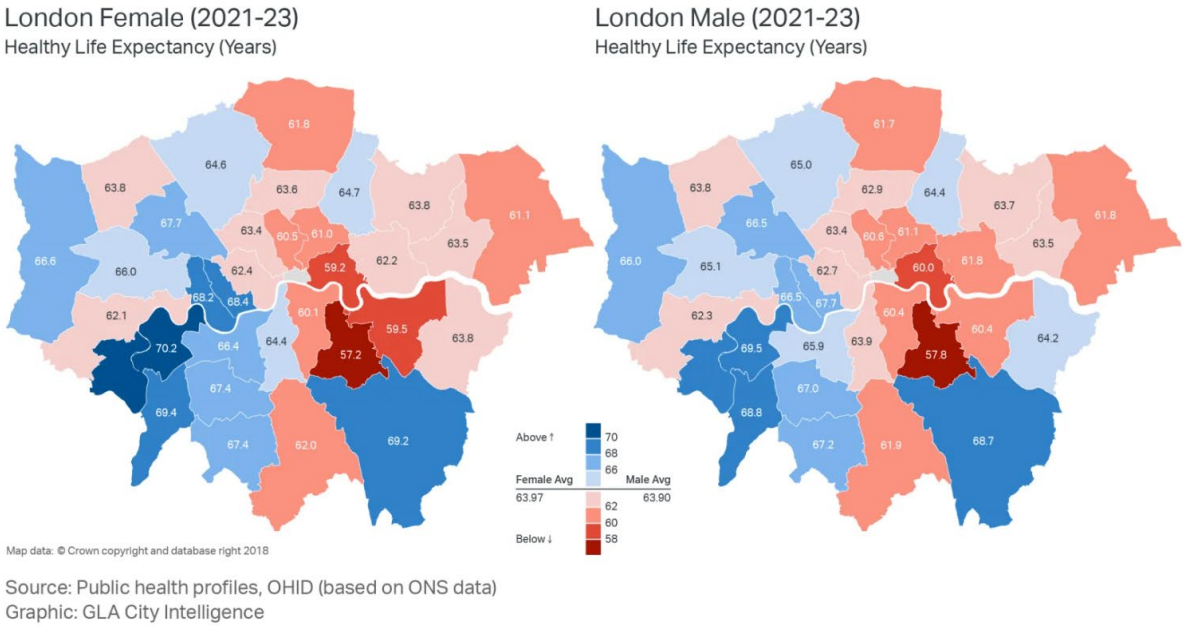


Figure 13 Healthy Life Expectancy across London's boroughs (2021–23).[28, 29]

The **leading causes of death** in London (all ages, 2024) were cancer (26%), dementia and Alzheimer's disease (11%), ischaemic heart diseases (10%), cerebrovascular diseases (5%), and chronic lower respiratory diseases (5%).[30] Disparities in death rates across nearly every cause of death contributed to the life expectancy gap between the most and least deprived deciles in 2021. Apart from COVID-19, circulatory conditions dominate the gap in Life Expectancy between the most and least

deprived deciles illustrating an important prevention opportunity – these gaps are largely due to the conditions in which poorer Londoners live and work[11]

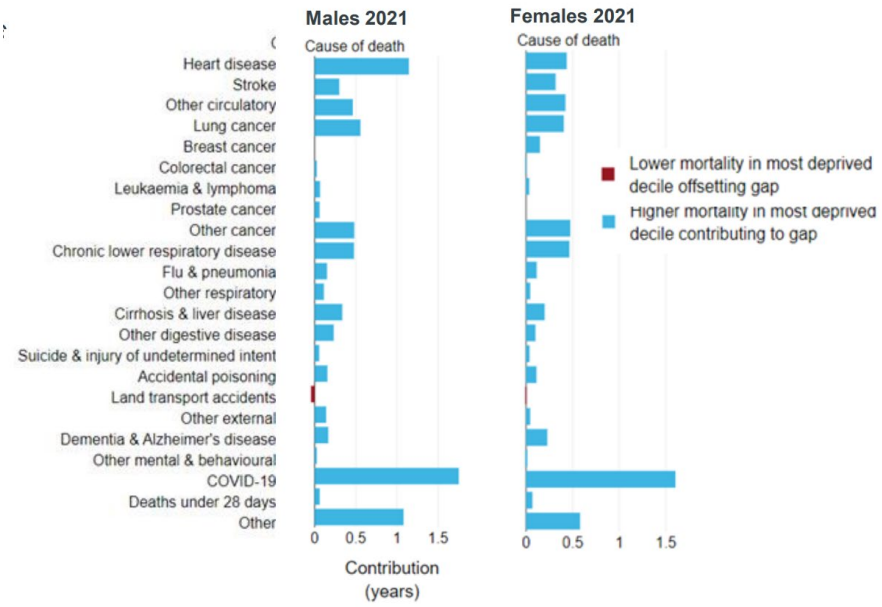


Figure 14 Breakdown of the gap in life expectancy in between the most and least deprived deciles by cause of death in London, 2021[31]

Prevalence of **physical health conditions** in London in 2023/24 include long-term musculoskeletal problems (aged ≥17 years, 2023, 13%), hypertension (all ages, 11%), diabetes mellitus (aged ≥17 years, 7%), asthma (aged ≥6 years, 5%), and cancer (all ages, 3%).[32] Prevalence of **mental health conditions** in London include depression 9.5% (2022-23) and severe mental illness 1.1% (2023-24). In terms of **wellbeing**, 24% of Londoners reported high anxiety and 5% had low happiness score.[33] Using modelled general practice data, prevalence of several commonly diagnosed health conditions was higher in deprived groups.[14]

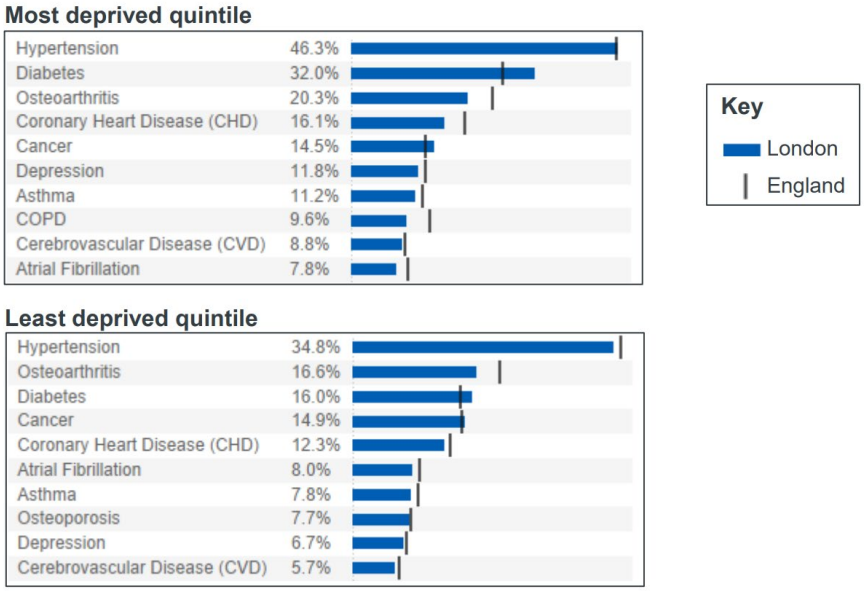


Figure 15 Comparison of prevalence of several common diseases, people aged 65-84, most and least deprived groups, London, September 2022[34]

The causes of death and long-term conditions prevalent in London listed above are driven by risk factors such as obesity, physical inactivity and air pollution, which in turn are influenced by the built environment. This will be discussed in later sections.

Across London, 13% of people are **disabled** (using the definition under the Equality Act 2010), with higher prevalence in more deprived neighbourhoods.[35] **Adaptations** to aid mobility in homes can make it easier for disabled and older people to continue to live in their homes and reduce demand on health and social care services.[36]

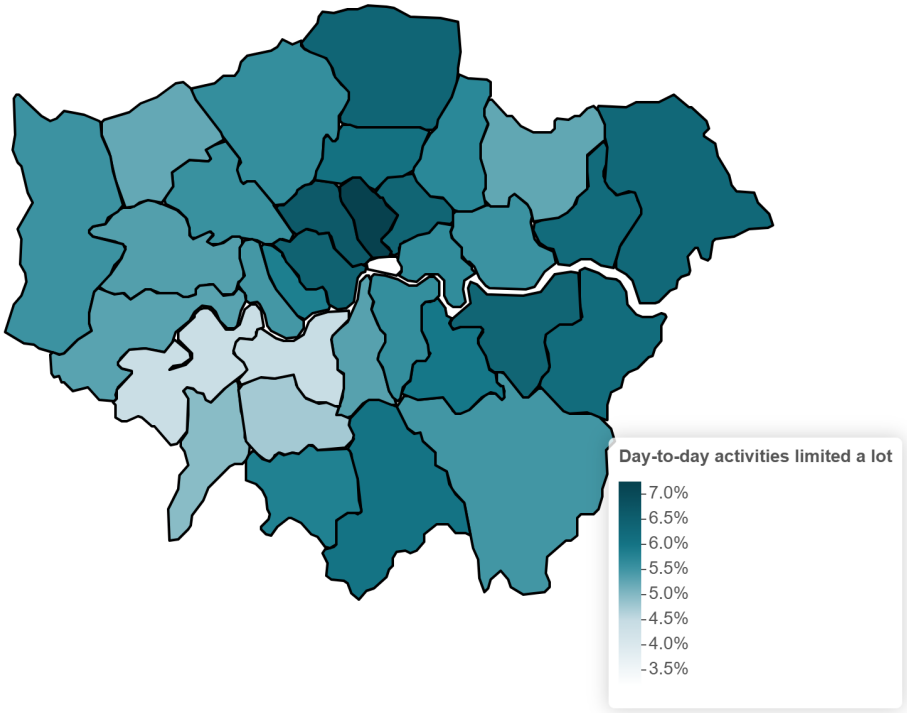


Figure 16 Percentage of Londoners whose day-to-day activities are limited by their disability, Census 2021[15]

Tobacco use, high body mass index (BMI), high blood sugar, and poor diet were the top **health behavioural risk factors** driving death and disability in London in 2023.[37] These risk factors are influenced by the social and structural environment and are unequally distributed across the population. **Smoking** prevalence is 10% in London (2024), significant inequalities remain with rates higher in deprived areas, in those with mental illness and routine and manual occupations.[38]

Half of London's adults are **overweight or obese** (58%, 2023-24).[39] Over one third (37%, 2024-25) of Year 6 children in London were classified as overweight or obese.[40] Obesity is higher in the most deprived areas, among unemployed and disabled people, and in some ethnic groups.[41] Diet and physical activity are key risk factors for overweight/obesity. In England, 5-a-day fruit and vegetable consumption is lower in in the most deprived areas, among unemployed and disabled people, and Asian and Black people.[42]

In London, only 67% adults and 47% of children and young people are **physically active** (2023-24) i.e. meet the UK Chief Medical Officers' recommended levels of physical activity.[43] Physical inactivity was higher among those in routine/semi-routine jobs and long-term unemployment, people with a disability, and some ethnic groups.[44] Spatial development that enables active travel (through walking,

cycling or using public transport)[45] can support Londoners to meet the physical activity guidelines.[46] Over a quarter of Londoners (27.6 per cent) now live within 400m of the cycle network.[47]

Density of outlets selling unhealthy commodities such as alcohol, tobacco, and fast food correlates with deprivation.[48] London has the highest density for fast food outlets in England (138.5 per 100,000 population, 2024), highest premises licensed to sell alcohol (19 per km^2, 2023/24), and second highest for gambling premises (17 per 100,000 population, 2025).[49]

London has 51 full time equivalent general practitioners (FTE GP) per 100,000 patients compared to 61 for England (September 2025). This ranged from 45 in North West London Integrated Care Board (ICB) to 58 GPs per 100,000 patients in South West London ICB (total FTE and registered patient count for all the practices that supplied valid data at ICB level).[50] There will be variation by boroughs and in smaller areas, with data held by ICBs.[51] There is a gap in information collated regionally on healthcare infrastructure[52] put in place to support new developments (some of which may be supported by the Community Infrastructure Levy and section 106)[53] including community health centres. This is a gap which should be considered for the future baseline.

Education

Parents in London struggle to find **childcare** to a greater extent that in other parts of the country, and this is particularly the case is more disadvantaged areas. This shortage of childcare is particularly acute for parents of a child who is disabled or has special educational needs, or for parents who work atypical hours (source Early years childcare in London). Inner London has the highest early years childcare costs in the country, followed by Outer London, although overall costs have reduced for families eligible for the working parent entitlement benefits compared to previous years. Those who are not eligible continue to face rising costs. The sufficiency of childcare provision is generally better in Inner London than Outer London. (Childcare Survey 2025).

The total number of children in London's **primary schools** has been falling since around 2016. For Inner London, the trend is still downwards while for Outer London the numbers appear to have stabilised. GLA analysis suggests the most likely scenario is for the size of the primary school age population to continue to decrease over the next decade. This fall will likely affect an increasing number of Inner London boroughs, and some Outer London boroughs. In contrast, a small number of Outer London boroughs are likely to experience an increase in primary-school-age children.[54]

London **secondary school** pupils consistently outperform those in other regions, and the attainment gap between pupils eligible for free school meals and those who are not is narrower than elsewhere. The GLA's Subregional Pupil Projections[55] predict that the number of secondary school children will fall from 452,000 in 2024/2025 to 376,000 in 2034/2035. In terms of regional variation, this follows broadly the same trends as with primary school children, with London predicted to see greater and faster declines in secondary school children than the rest of England, and Inner London predicted to see greater and faster declines in secondary school children than Outer London. However, for the most recent projections do not yet incorporate the implications of an increased housing target for the next London Plan.

There is an increasing need for **special education needs and disabilities (SEND) provision**. According to CCN analysis[56] of DfE and ONS data, the percentage of children and young people with Education, health and care plans (EHCPs) grew from 1.45% in 2014/15 to 3.38% in 2024/25. This increase in need is not unique to London, and is attributed by the report to increase in three types of need – autism and other neurodiverse needs (ASD), social emotional and mental health needs (SEMH), and speech language and communication needs (SLCN).

London is home to **33 universities** and multiple higher education colleges, providing for over half a million students. (What does the Journey to a Million mean for London? | UCAS). More than a quarter of undergraduates and two thirds of postgraduates come from outside the UK. London's student population is also local when compared to other regions of the country – more students at London universities come from their 'home' region than at universities in other regions. Universities are situated across London, and range in size from large to small and specialist institutions.

The latest available data shows that 84 percent of London Higher Educations Institution graduates in academic year 2019/20 were either in employment or further study the year after graduating (Source DoE, LEO Graduate and Postgraduate Outcomes). While this is slightly lower than the rate for England overall, this is due to London having a more competitive labour markets with a higher share of the workforce having degree qualifications and London attracting international talent. This makes it comparatively more difficult for new graduates to enter the labour market.

Social and community facilities

Accessible arts, cultural, entertainment, leisure, recreation and sports facilities are important elements of social infrastructure and contribute greatly to the quality of life of Londoners. With 325 public libraries, London has the largest public library network of any major world city[57] an extensive network of borough-run and community led community centres (901 recorded in 2022).

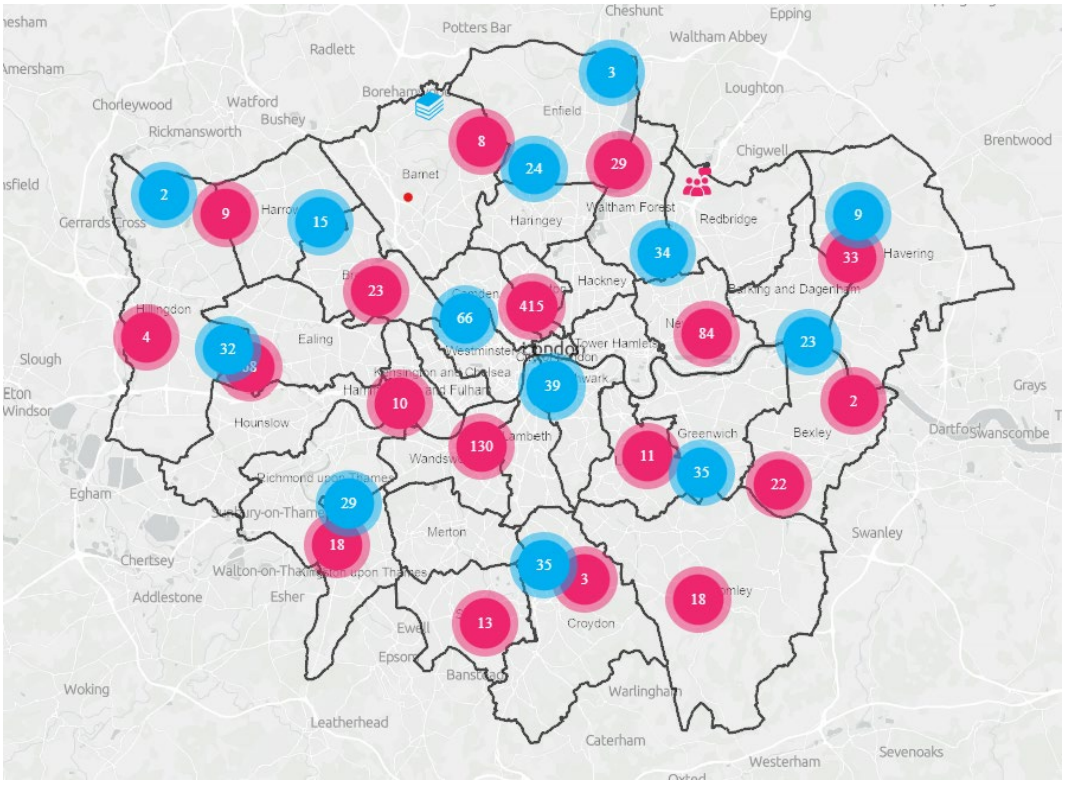


Figure 17 Numbers of Community Centres (pink) and Libraries (blue) in London, 2022 (Source GLA Cultural Infrastructure Map of London)

Alongside these more formal spaces, public spaces such as playgrounds, parks, and local high streets are also important to the wellbeing of communities. Results from the 2021-22 Survey of London indicate going to parks has a strong income gradient, with lower-income Londoners (those with an annual income of less than £14,900) less likely to have gone to the park in the last month (54 per cent) than the highest-income Londoners (annual income of more than £58,900) (87 per cent). This income

gradient is likely to reflect easier access to nearby parks for those on a higher income, and also those on a higher income working shorter hours or being more likely to work from home.

Safe, inclusive, and stimulating play space is essential to child development, and physical and mental wellbeing. London needs high quality play space that meets the needs of children across the age spectrum, from very young (0-4, to older children (5-11), and teenagers (12-15, 16-17). Pan-London data on the quantity and/or quality of play space does not exist. Some boroughs conduct their own audits of play space, either through open space audits or play space strategies (e.g. LB Tower Hamlets, LB Lewisham).

Engagement with the arts in London has increased in recent years, however it varies significantly between boroughs, with values ranging from 96 percent in Richmond Upon Thames down to 83 percent in Barking and Dagenham, and 84 percent in Redbridge. The number of pubs in London stopped declining around 2015 following 15 years of a high level of closures.[58]

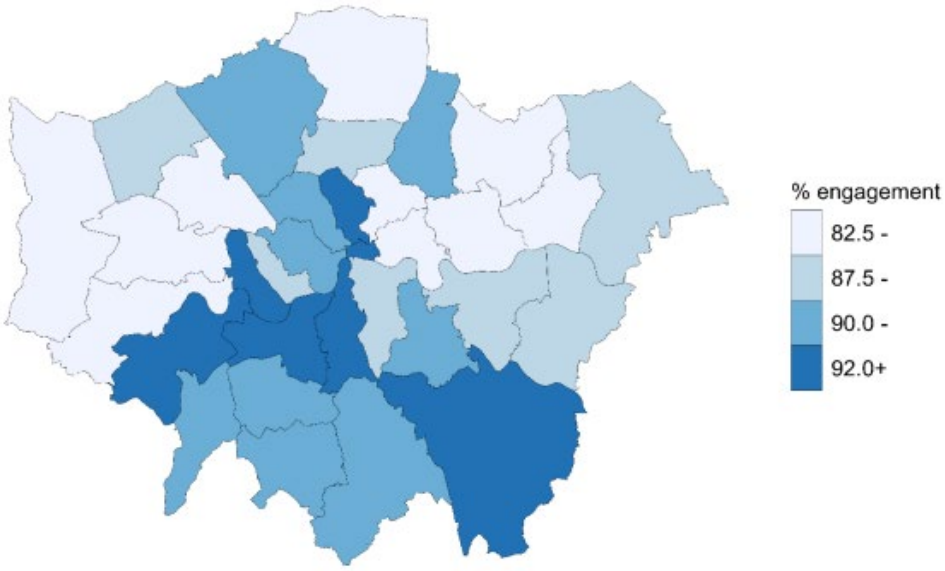


Figure 18 Percentage of adults who engaged with the arts in-person in the last 12 months by borough, 2023/24 (Source: Data from Participation Survey)

Digital exclusion can be found across all corners of London. It impacts older Londoners, those living in poor health or with a disability, those with low numeracy and literacy skills, those living on a low income, and those in areas of poor infrastructure coverage. Bridging the digital divide is a complex challenge, covering basic skills, connectivity, access to a device and affordability heightened by the cost-of-living crisis. As more and more services are shifted online, inequalities are created for those who are digitally excluded such as spending more time transacting with banks, or higher food costs without online shopping, or being unable to access NHS online services. Existing community facilities such as libraries are important as hubs for delivering digital inclusion support.

Poverty and deprivation

Despite being the richest city in the UK, London also has the most people in poverty. Around 1 in 5 Londoners (19%) live in relative poverty (after housing costs), this is roughly 1.7 million people. A third of children in London live in poverty, and one child in 21 in homeless and living in temporary accommodation.

The poverty rate is highest in London compared with all other regions of the UK and especially high in Inner London. There is a clear pattern that Londoners living in the most deprived areas have poorer outcomes compared with those living in the least deprived areas across various measures (e.g. neighbourhood relationships, trust and social isolation). Poverty and deprivation are important predictors of loneliness and act as major barriers to social integration. Londoners experience more social isolation than people in other regions of the UK, and loneliness is particularly prevalent among older people.

Based on the UK Government's qualitative index of multiple deprivation (IMD), many places in London are among the most deprived in the country. The pattern of deprivation is geographically complex, with a patchwork of contrasts between neighbourhoods within boroughs. Areas of deprivation are often in concentrations and follow particularly corridors. While neighbourhoods in Central London tend to be among the least deprived, these are surrounded by areas of deprivation such as Tower Hamlets in the East and the north of the City of Westminster. Suburban areas of Outer London, particularly in the south west, are among the least deprived.

Crime, safety and security

London is a relatively safe city when compared to other global cities and the likelihood of being a victim of crime is low in London. However, as a global city it is at higher risk of terrorist attacks than other cities in the UK. Heightened risks of threats to security can impact London's economic competitiveness and tourism.

During the COVID-19 pandemic and lockdown periods, recorded crime levels reduced significantly within London. This was followed by year-on-year increases between 2021/22 and 2023/24. Based on 2024/25 data, London's recorded crime level looks to have stabilised again. There continues to be an uneven distribution of crime across London. Westminster (89,280 offences), Camden (42,814 offences), and Newham (40,956 offences) remain as the boroughs with the highest volume of total offences.

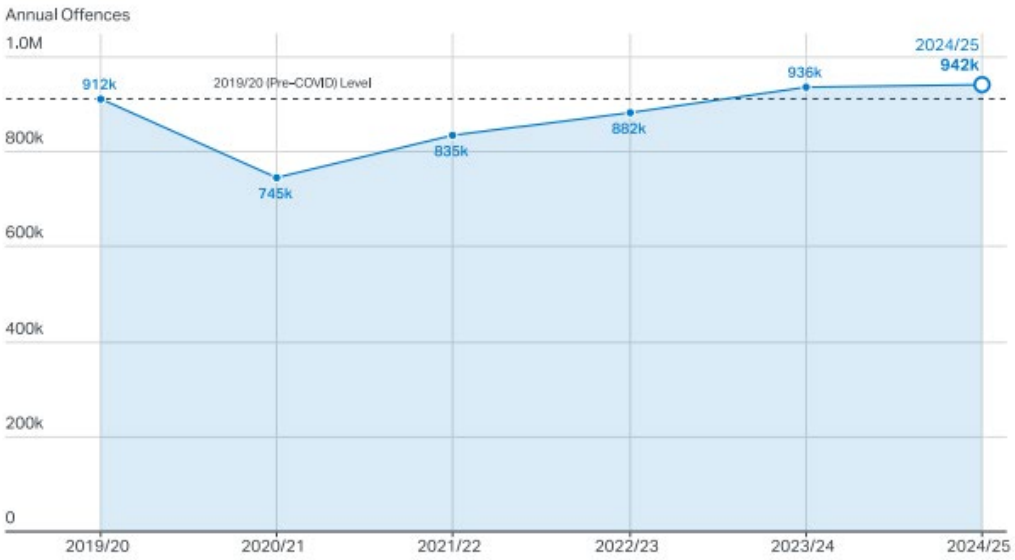


Figure 19 Total annual notifiable offences in London, 2019/20 to 2024/25 (Source: MPS Crime Data Dashboard)

Acquisitive crime (theft, burglary, robbery, motor vehicle crime) accounted for 53.8 percent of the total offences recorded between April 2024 and March 2025 (compared to 52 percent during 2023-24), and violent crime (violence against the person and sexual offenses) accounting for 27.8 percent (compared

to 29.5 percent during 2023-24). Violent crime in London is disproportionately concentrated in deprived areas, with significant local variations, and disproportionately affects specific socio-demographic groups, including young Black men, men in general (except for domestic violence where women are most affected), and people with disabilities.

MOPAC's Public Attitude Survey[59] is used to gain an understanding of Londoners' perceptions and experience of policing and crime within London. Levels of self-reported victimisation – the percentage of people saying they have experienced something they would consider to be a crime have remained stable over the past year at 5 percent. Just under half of Londoners are worried about crime and anti-social behaviour in their local area, and around one in five Londoners feel hate crime is a problem in their area. Females are significantly less likely to feel safe after dark than males – in Q1 25/26, 58 percent of females felt safe after dark compared with 77 percent of males.

Some groups of Londoners are more likely to be concerned about crime and safety in their area. In Q1 2025/26 LGBT+ Londoners, mixed ethnicity Londoners, and Jewish Londoners were most likely to feel hate crime is a problem in their area. Disabled Londoners, females, and Sikh Londoners were least likely to feel safe walking alone after dark. Fear of crime can be a barrier to walking or using public transport, and more generally can be stressful and limit people's access to activities and contribute to social isolation.

Transport & Connectivity

Mode share

The share of trips in London that were made by public transport, walking or cycling increased by over 10 percentage points between 2000 and 2015, with around 9 percentage points from growth in public transport use. The share of trips by these modes then stalled up to 2020, in part due to a decline in bus use (the number of journey stages dropped by over 250 million between 2013 and 2019, from around 2.4 billion to 2.1 billion). Following the pandemic in 2020, there was further decline in trips made by public transport, particularly among peak hours commuting. This is shown in Figure 20. Over the same period, cycling saw strong growth, increasing from 3.6 per cent of trips in 2019 to 4.5 per cent in 2023.

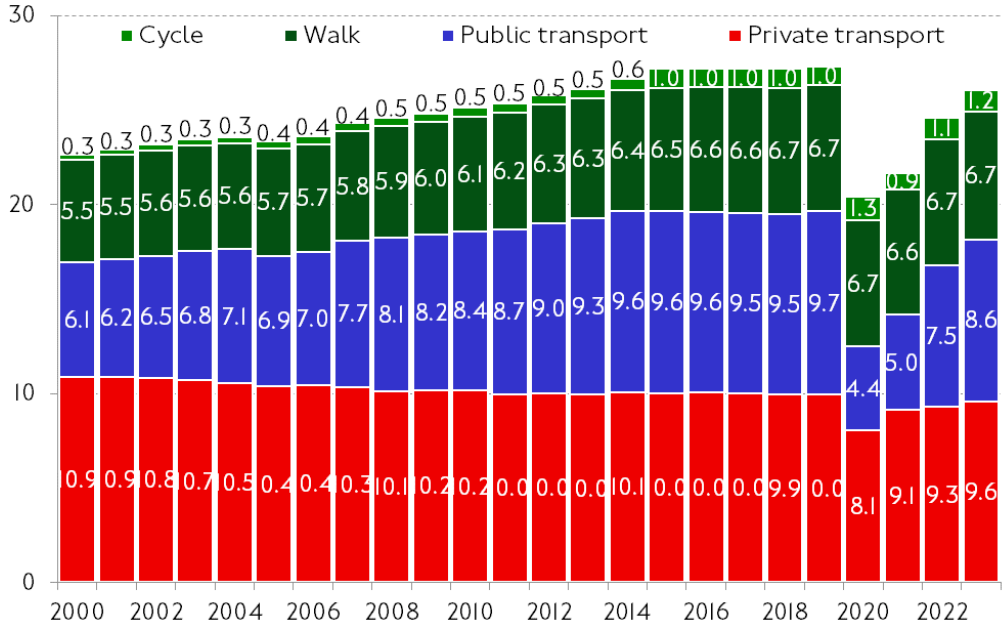


Figure 20 Estimated daily trips (millions) by mode, seven-day week average, 2000-23[60]

Streets

Motorised traffic in London has variety of negative social, environmental and health impacts. Among the most acute of these impacts are the number of people who are killed or seriously injured on London's roads each year, averaging 3,750 a year between 2021 and 2023. This is a 24 per cent reduction from the 2011-13 average, though recent reductions have plateaued after pandemic-affected years.

Traffic also generates significant **emissions** affecting both local air quality and global climate change. Road traffic emissions make up 81 per cent of London's transport carbon dioxide emissions and 58 per cent of London's total carbon emissions. Emissions from traffic have reduced over the last decade but have started to increase again reflecting recovery from the pandemic, up 8 per cent from 2020 to 2022. Measures including the Ultra Low Emission Zone (ULEZ) have contributed to a sharp decline in high concentrations of air pollutants compared to the 2023 scenario without the London-wide ULEZ: average roadside nitrogen dioxide concentrations are down 23 per cent in comparison. Particulate matter exhaust emissions were 17 per cent lower in comparison.

Despite this progress, London's air remains harmful to human health. The World Health Organisation recently released updated guidelines that recommend a reduction in NO2 concentrations from the current national air quality objective of 40ug/m3 to 10ug/m3. Average NO2 concentrations at roadside were 34ugm-3, 29ugm-3 and 36ugm-3 for central, inner and outer London, respectively, in 2023. NO2, non-exhaust emissions and particulates impact Londoners' health, as do traffic impacts from severance and noise. London's vehicle fleet is going through a process of electrification which can reduce some impacts and is expected to make up 49 per cent of London's car and van fleet by 2030, though this means the majority would still have internal combustion engines.

Car use also affects health through its influence on physical activity levels, and this impacts health and independence into old age. **Active travel** is the primary source of physical activity for many Londoners and serves as an equitable form of physical activity that can be built into an everyday routine. Walking, wheeling and cycling are considered as moderate to vigorous forms of physical activity, contributing to physical activity weekly guidelines. Walking, wheeling and cycling can also be integrated with journeys to/from public transport hubs for onward journeys.

.In 2023/24, 37 per cent of Londoners report doing at least 20 minutes of active travel on the day they were surveyed, a decline of one percentage point since 2022. In 2013, research showed that Londoners with no car were 10 per cent likelier to achieve that figure, and twice as likely as those living in households with two or more cars. This is partly due to the fact that an average trip in London by car includes less than a minute of active travel, compared to 8-15 minutes by public transport.

Since 2019, overall **traffic levels** have fallen across London. Traffic volumes have reduced by the greatest percentage rate (14 per cent) in central London, but outer London traffic reduction (5 per cent) has had the greatest impact (a reduction of 150,000 cars). Although morning peak average excess delay (in minutes per kilometre) is lower in outer London (0.79) compared to central London (1.72), two thirds of London's traffic by distance driven is in outer London meaning the real impact of traffic reduction in outer London is higher. Despite this reduction, in 2024 alone vehicle congestion cost the capital £3.85 billion, averaging at £942 per driver. Street space is dominated by vehicular movement and, in many boroughs, large proportions of space is given to residents' on-street parking. On-street parking has been estimated to take up over 14km2 of space across London.

Goods vehicle flows crossing the inner and central London cordons have remained similar between 2021 and 2024. Goods vehicle flows at the outer London cordon have recovered more quickly since the pandemic compared to inner and central London, and compared to car flows.

Other forms of street transport have grown in use since the last London Plan was prepared. Dockless cycle hire companies operate in 23 boroughs and are estimated to have between 48,000 and 60,000 cycles in use. This is 4 to 5 times the number of Santander cycles operated by TfL. However, cycle ownership remains significant: for 2022/23 to 2024/25, only 6 per cent of cycle trips by London residents were made by those without access to their own cycle.

Connectivity and capacity

London has world-leading levels of **public transport connectivity**, including to some of the highest concentrations of employment density in the world. Central London in particular benefits from hyperconnectivity, with a large pool of potential workers and customers thanks to its radial rail network. However, there are some imbalances within London: in connectivity between inner London and outer transport hubs and more suburban areas; and between south and north London. The level of connectivity available also varies by who is travelling, with only about one third of the London Underground network providing step-free access.

The Public Transport Access Level (PTAL) metric provides a measure of Londoners' access to public transport (based on how much walking and waiting time is required to access a train, tram or bus). A pattern of relatively higher connectivity towards inner and central London, town centres and along rail lines is visible in the PTAL map shown in Figure 21 below[61].

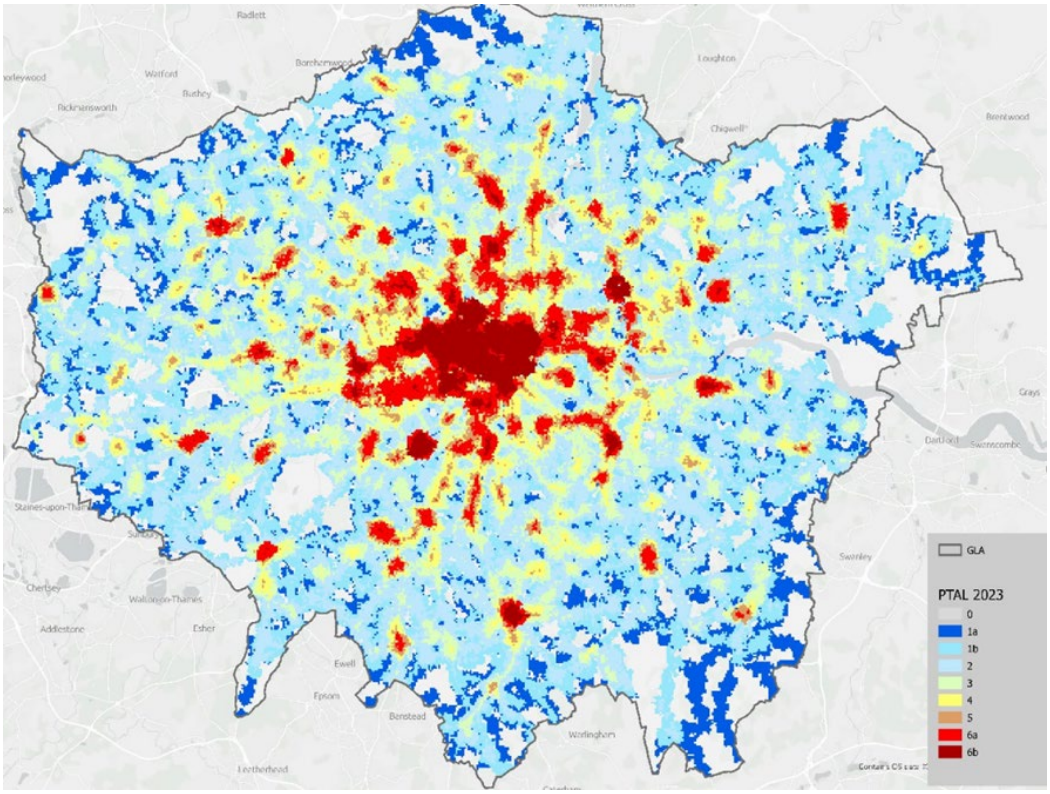


Figure 21 2023 Public Transport Access Levels (Source: TfL Travel in London 2023: Annual Overview)

TfL is developing is developing a **new connectivity metric** to complement PTAL that is based on journey times by sustainable modes to useful destinations, not just to public transport services. This should provide a fuller picture of how well connected a place is and better capture the benefits of transport improvements. For example, Figure 3 shows the number of jobs that can be accessed within 45 minutes of travel on the public transport network. This produces some similarities to PTAL, but the spatial pattern generally corresponds more closely to distance from employment centres including central London (where there is the greatest concentration of jobs) and travel by rail (which typically

goes further in the same amount of time compared to other modes). TfL is also exploring what equity measures could be incorporated into or alongside this.

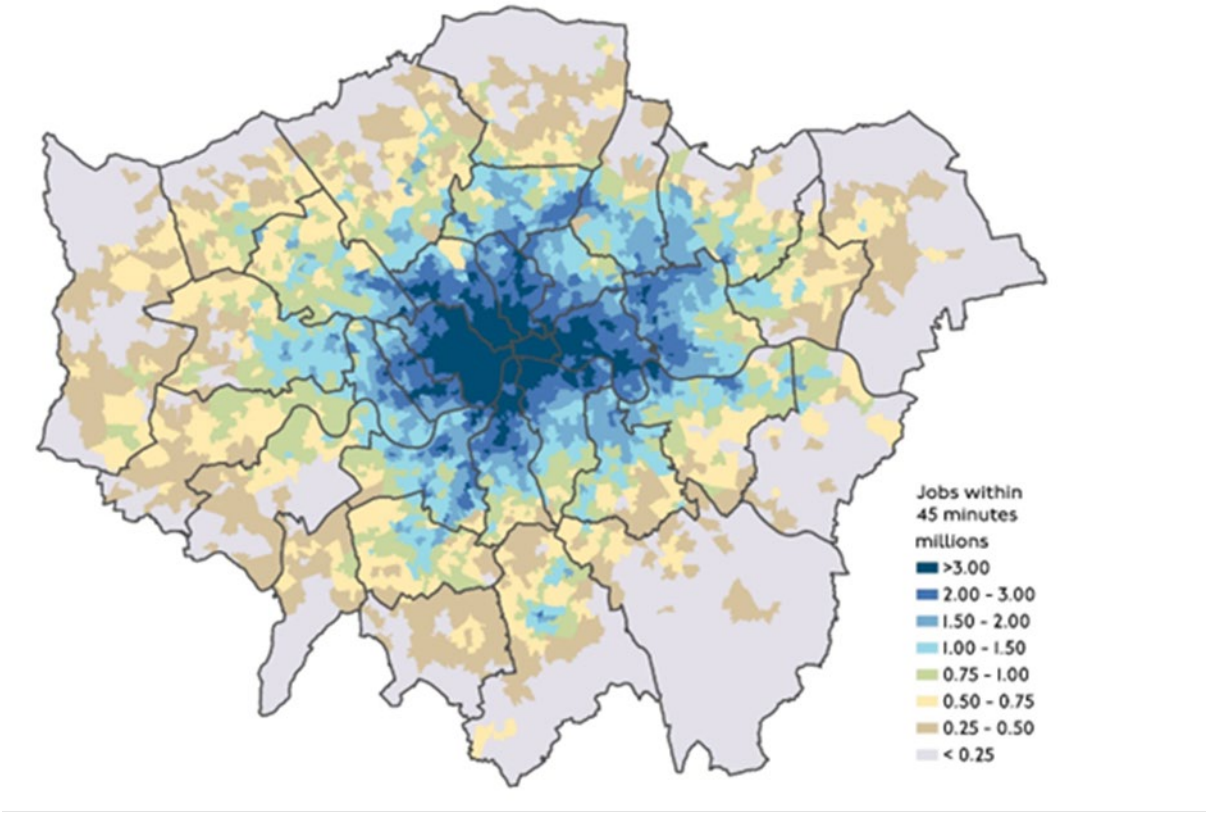


Figure 22 Number of jobs within 45 minutes of travel on the public transport network

London also has several national and international transport connections. There are six airports within a 60-minute journey time to central London. The number of air transport movements (commercial take offs and landing) increased steadily from 2013 to 2019. In 2022 to 2024 flight landing and taking off increased but are still 10 per cent lower than the 2019 peak. There are still over 1 million air transport movements. Increased airport operations can worsen air quality, noise and carbon emissions. St Pancras International station provides international rail services. In 2024/25, 186,000 coaches departed from Victoria Coach Station to domestic and international destinations.

Rail capacity and connectivity have generally improved over the last couple of decades. Examples include the Elizabeth line which opened in 2022 and added 10 per cent to central London's rail network capacity, and the London Overground extension to Barking Riverside, which also opened in 2022. In 2025, central Government committed funding to TfL to extend the DLR to Thamesmead, improving overall connectivity in east London and unlocking new housing.

Buses provide shorter walking distances, cheaper fares, and greater geographical breadth. Average London bus network speeds have reduced from 9.6 to 9.3 mph over the last decade, due to traffic congestion. This contributes to reductions in bus use: despite a continued freeze on bus fares, since 2016 patronage is still low with 512,000 fewer journey stages from 2013/14 to 2023/24. This lower ridership puts economic strain on the bus network. Buses require significant subsidy to keep running in London, especially given many passenger trips (such as those from children, students and people with an Older Person's Freedom Pass) do not attract fares. Slower journey times create a cycle of buses being less attractive, more services being required to maintain reliability, and then more subsidies required, more car use that causes congestion, and then a further potential reduction of services.

Accessibility is also an important part of connectivity. Currently 93 stations on the TfL network are step free, over a third. In 2023, the reduction (from the 2016 baseline) in the additional journey time of using only the step-free transport network was 37 per cent thanks to the continual programme of step-free stations upgrades. There are 9 Tube stations currently shortlisted for the next phase of step-free access work. All buses and almost all bus stops in London are step free.

London's connectivity is part of why it is much more densely populated than the rest of the country. As with most dense urban areas, people travelling on London's rail network often experience **crowding** at busy times and locations. Crowding, using the measurement of passenger kilometres travelled on TfL rail services with more than two people standing per square metre, has been sensitive to pandemic demand fluctuations. It decreased from 10 per cent in 2019 to 0 per cent in 2020, but increased to above 3 per cent by 2024. However, this is an average across the week which hides variation between Mondays and Fridays (which have seen particularly reduced demand since 2020) and Tuesdays to Thursdays (where demand has recovered more strongly). It also hides specific bottlenecks in the network used by key routes: these can be complex and costly to resolve.

Without further investment in capacity on the TfL and National Rail networks, it is expected that crowding will increase with population and housing growth. Modelling indicates that the crowding challenge will be acute on some lines, including parts of the Central, Jubilee, Northern and Victoria Underground lines, parts of the Elizabeth line, and parts of the Windrush and Mildmay Overground lines. Sections of these lines will approach or exceed the standing density threshold of four passengers per square metre, beyond which service degradation can occur. Like the lack of step-free-access, crowding can also be a barrier to travel for some Londoners.

Heritage and Townscape

Historic Environment

London is world-renowned for its heritage and built environment which are emblematic of the city and contribute to a strong sense of place and civic pride. This built and landscape heritage provides a depth of character that has immeasurable benefit to the city's economy, culture and quality of life. One of the things that makes London distinctive is the way it combines the old and the new. London's heritage assets and historic environment make a significant contribution to the city's culture by providing easy access to the history of the city and its places. Recognition and enhancement of the multicultural nature of much of London's heritage can help to promote community cohesion. In addition to buildings, people can perceive the story of the city through plaques, monuments, museums, artefacts, photography and literature.

London's **designated and non-designated heritage assets** range from the Georgian squares of Bloomsbury to Kew Gardens (Victorian) and the Royal Parks, and include ancient places of work like the Inns of Court (medieval in origin), distinctive residential areas like Hampstead Garden Suburb (early twentieth century) and vibrant town centres and shopping areas like Brixton and the West End. This sheer variety is an important element of London's vibrant economic success, world class status and unique character.

London's designated heritage assets currently include:[62]

- Four UNESCO **World Heritage Sites**, including the Royal Botanic Gardens, Kew, Maritime Greenwich, the Tower of London and the Palace of Westminster
- 172 **scheduled monuments**
- 166 **registered parks and gardens**

- One registered battlefield in the London Borough of Barnet
- 19,317 **listed buildings**
- Over 1,000 **Conservation Areas**

There are 27 **designated views** in the London Plan comprising 3 types: London Panoramas, River Prospects and Townscape Views. These views include significant buildings or urban landscapes that help to define London at a strategic level. The Mayor seeks to protect the composition and character of these views, particularly if they are subject to significant pressure from development. New development will often make a positive contribution to the views however, in other cases development may compromise the setting or visibility of a key landmark. The majority of views are focused along the river Thames.

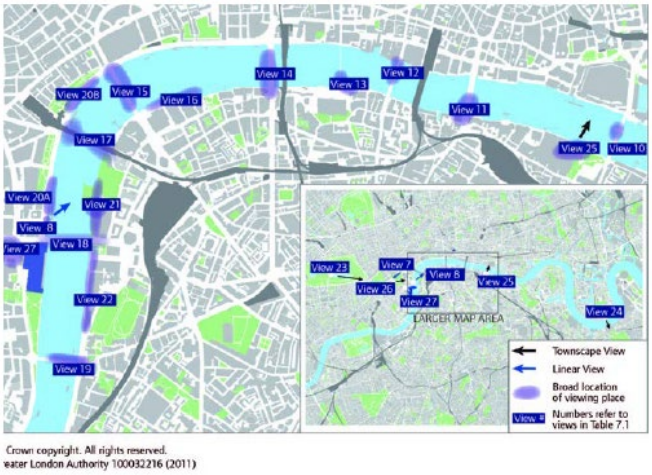


Figure 23 River Prospects

Within some views, a Protected Vista to a strategically important landmark (St Paul's Cathedral, the Palace of Westminster and the Tower of London) is also defined. These views have stronger protection than the other types of views in that a height threshold for development is defined directly between the viewing point and the strategically important landmark (Landmark Viewing Corridor). In addition to strategic views, London boroughs also define views that are of local importance.

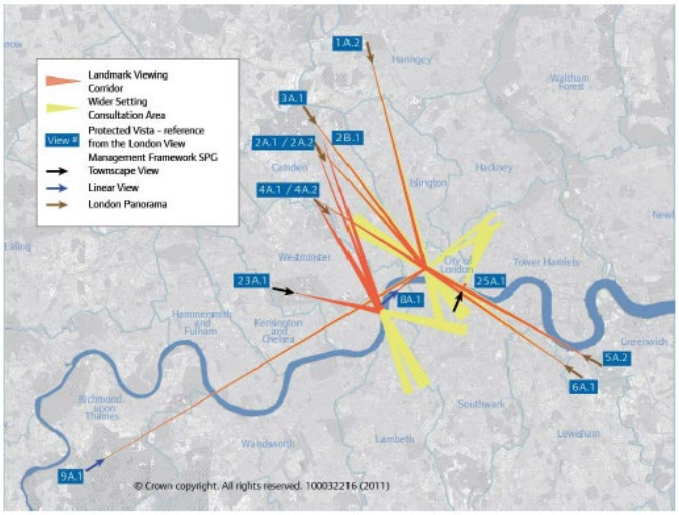


Figure 24 Protected Vistas

The amount of **heritage at risk** provides one indication as to how the historic environment is being managed. In 2024, there were 599 entries on Historic England's Heritage at Risk (HAR) register in London. This makes up 12 percent of the total 4,891 nationally designated assets at risk. The overall number of assets at risk has stayed relatively consistent over the past 10 years – the London Plan 2014/15 AMR identified 594 assets at risk in London – although this overall number does not reflect assets being removed from or added to the HAR register as their condition changes.

In terms of decay, acidified air pollutants can accelerate the degradation of valuable buildings, especially cultural monuments such as older sandstone and limestone buildings. Other cultural monuments, such as rune stones and rock carvings, also display evidence of serious damage as a result of acidifying air pollutants.

London is a very dynamic, complex urban environment in which pressure for development is high. Due to this intense pressure, it is often the setting of heritage assets that are at most risk. Whilst all of London's World Heritage Sites are sensitive to development around them, the location of the Tower of London and the Palace of Westminster in the Central Activities Zone means their settings are under significant development pressures. Recent Technical Reviews from the International Council on Monuments and Sites (ICOMOS) have identified concerns that the increasing number of tall buildings within the setting of several World Heritage properties in London.[63]

Landscape

The landscape takes its character from a combination of elements, including topography, watercourses, land use and pattern, vegetation, open space and cultural heritage features. Landscapes vary considerably in character and quality, and are often considered a key component of the distinctiveness of any local area or region. London is a green city, with almost 50 per cent of London's area being green and blue, and London became the world's first National Park City in 2019. However, the quality of green spaces and levels of access to them varies greatly.

The **Green Belt** forms 22 percent of London's Land area, and 10 percent or London is designated as **Metropolitan Open Land (MOL)** within the built environment. This includes spaces such as Richmond Park and Hampstead Health. Unlike green belt, MOL criteria does involve environmental considerations. London also includes 22 Natural Landscape Areas (NLAs). A Natural Landscape Area is an area which is an original watercourse, contains vegetation typical of the soils and geology of its area and/or allows an appreciation of the wider geomorphology and natural topography of London. These 22 landscape character areas have been brough together into eleven London Local Nature Recovery Strategy landscape areas.

Townscape

The social, cultural, environmental and economic relationships between people and their communities are reinforced by the physical character of a place. Townscape includes the buildings and the activities and spaces between them. London's historic character is also synonymous with townscape and landscape features, the importance of which is discussed in the preceding Historic Environment section. The London Historic Character Thesaurus facilitates mapping and analysis of historic character in London at a range of scales.[64]

How well development responds to character plays a key role in determining how successful it is. The scale, form and layout of buildings shape the public realm and create the character and density of an area. Generally density is related to the scale and height of buildings, although tall buildings do not necessarily have a high density. Density is mainly referred to for housing developments. The current London Plan is adopts a character led approach to identifying area suitable for different levels of change as follows:

- Conserve areas are areas of consistently high quality and coherent character such as conservation areas and designated green spaces (such as MOL and greenbelt). These will include areas that are deemed to be of highly positive character. In conserve areas, change must be undertaken particularly sensitively to enhance the valued qualities and character of the area.
- Enhance areas are areas of mixed design quality in which moderate change should seek to enhance the overall character of the area.
- Transform areas are areas that have low-quality development of ill-defined character, and where an opportunity exists to establish a newly coherent character.

Tall buildings can have a significant impact on the surrounding environment, particularly in terms of their impact on the townscape and local micro-climate. They play an important role in delivering the homes, workspace and infrastructure that London needs and also raise strategic issues and can have impacts across borough boundaries. Protected strategic and local views are an important consideration when considering the location and height of tall buildings.

The **public realm** is an important feature of the townscape and refers to streets, footpaths, cycle paths, roads, street furniture, public spaces and landscaping etc. Perceptions of the public realm are most commonly related to the maintenance of pavements and roads, the cleanliness of open spaces and the quality of local parks. Other elements which influence perceptions include traffic congestion, road markings, the provision of seating, suitably designed dropped kerbs, signage directions and the extent to which streets are cluttered with signs and street furniture.

Despite progress, London's built environment still has barriers to the **inclusion of all Londoners**. The quality and inclusiveness of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors.

The **design of streets** is also an important element in the improving people perception of the public realm. It can encourage active travel including walking and cycling which in turn can improve people's physical activity and helps tackle health issues such as obesity. Attractive streets can also encourage people to socialise and play, building stronger social networks and reducing social isolation, both of which are important for physical and mental health. The provision of shade through trees can help to protect people from sun damage and enables people to cool and regulate their body temperature; and the provision of resting places can help people who have mobility impairments and need places to stop and rest to break up a longer walking and/ or cycle distance.

Housing

Note information in this section is subject to updates published as part of the forthcoming Housing in London 2025 report.

Housing Stock

London's housing stock reached approximately 3.84 million homes in 2025, an increase of 10% since 2015. This growth has not kept pace with population growth, which surpassed 9 million in 2024, and employment growth, both of which continue to drive housing demand. Housebuilding remains below the London Plan target of 52,000 new homes per year: as of October 2025, EPCs were registered for 27,640 new dwellings, continuing the low delivery trend of 2023 and 2024.

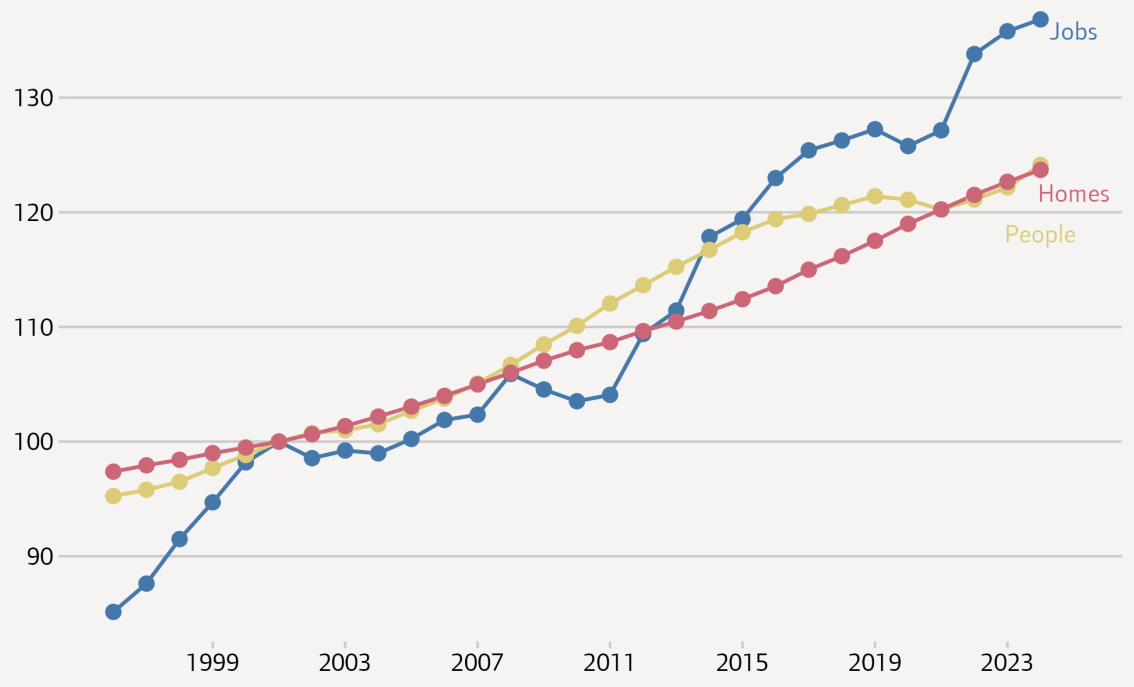


Figure 25 Indexed trend in number of jobs, people, and homes in London 1996 to 2024 (Source: ONS, Workforce jobs by industry, seasonally adjusted; ONS, Mid-year population estimates; MHCLG, Dwelling stock data)

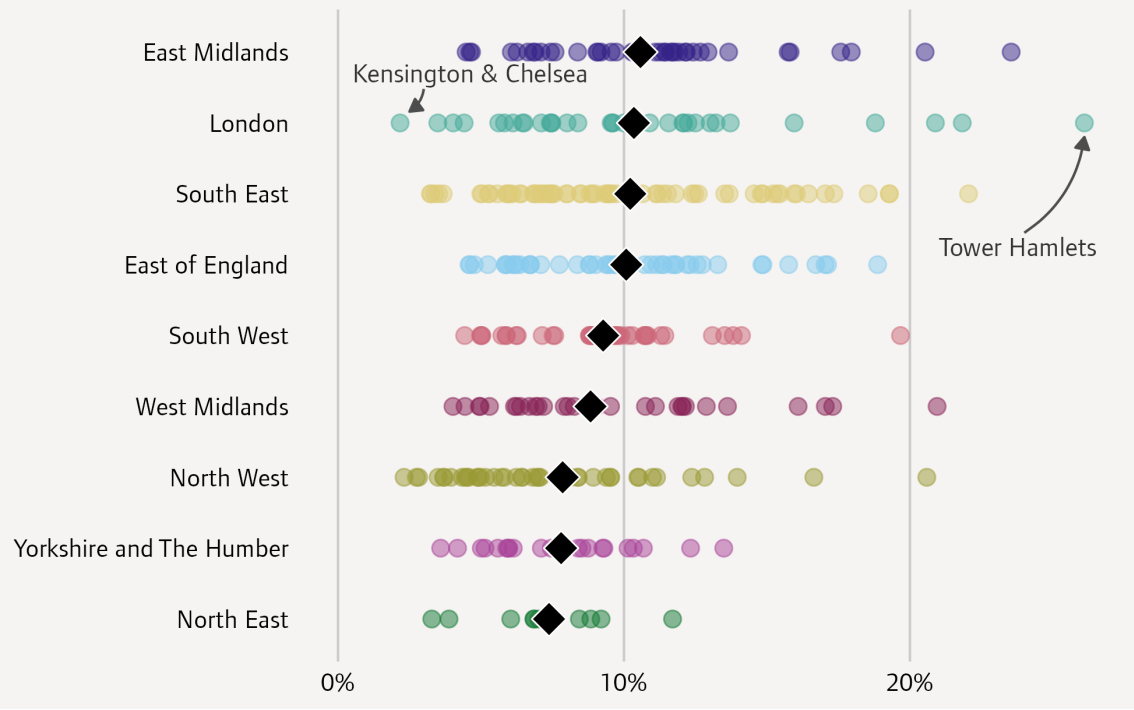


Figure 26 Percentage change in domestic properties registered for Council Tax as upper tier local authority level, 2015 to 2025 by English region (Source: VOA, Council Tax Stock of Properties 2025. Chart excludes the Isles of Scilly, which saw a 3% decrease in this period. The Council Tax definition of domestic properties includes some communal residences that are excluded from MHCLG's dwelling stock statistics.)

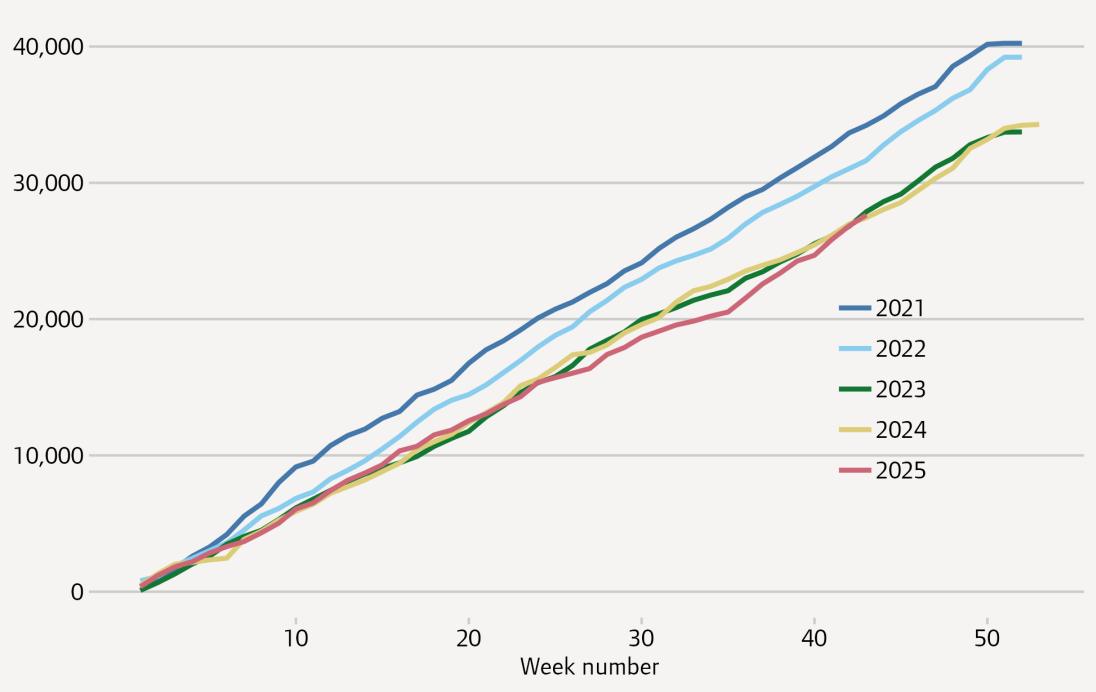


Figure 27 Cumulative weekly Energy Performance Certificates (EPC) for new dwellings in London, 2021 to 2025 (Source: MHCLG)

Affordable housing delivery has fallen sharply since 2022/23. Starts funded by the GLA dropped by 91% in 2023/24 and remain far below previous highs, despite a modest recovery in 2024/25 to 3,991 starts. Completions of affordable homes from all sources reached 13,354 in 2024/25, still 15% below 2022/23 levels. Affordable housing stock stands at 804,000 homes, the highest since 1999, but turnover is historically low, limiting access for new tenants.

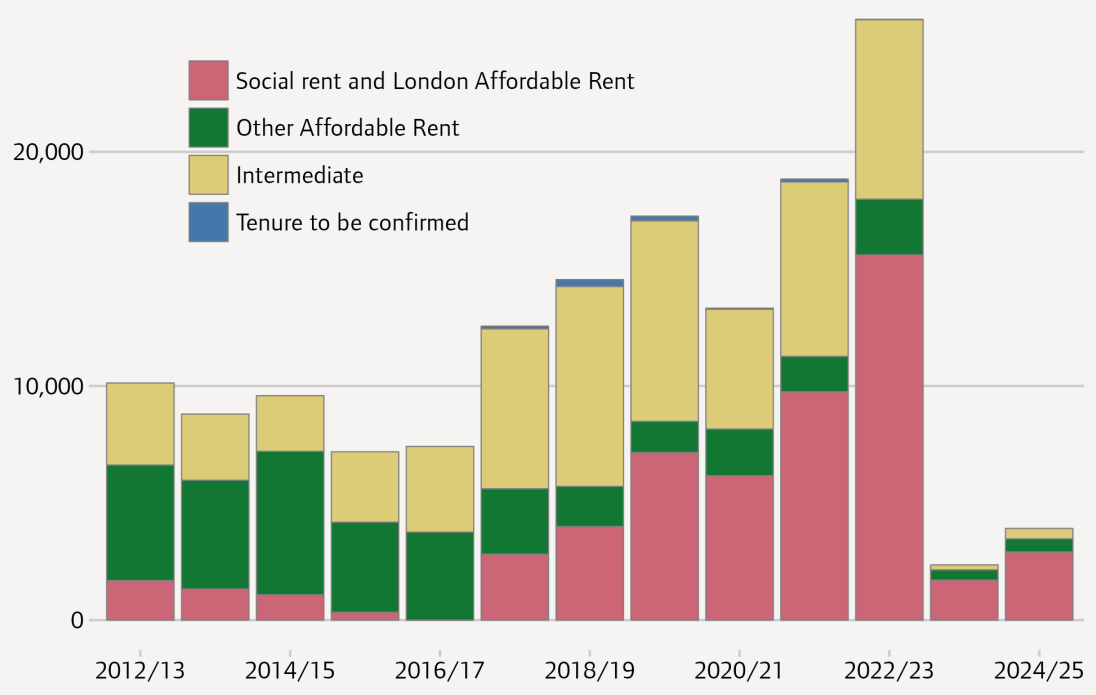


Figure 28 Affordable housing (social rent and London Affordable rent, other Affordable Rent, Intermediate, tenure TBC) starts in London funded by the GLA, 2012/23 to 2024/25

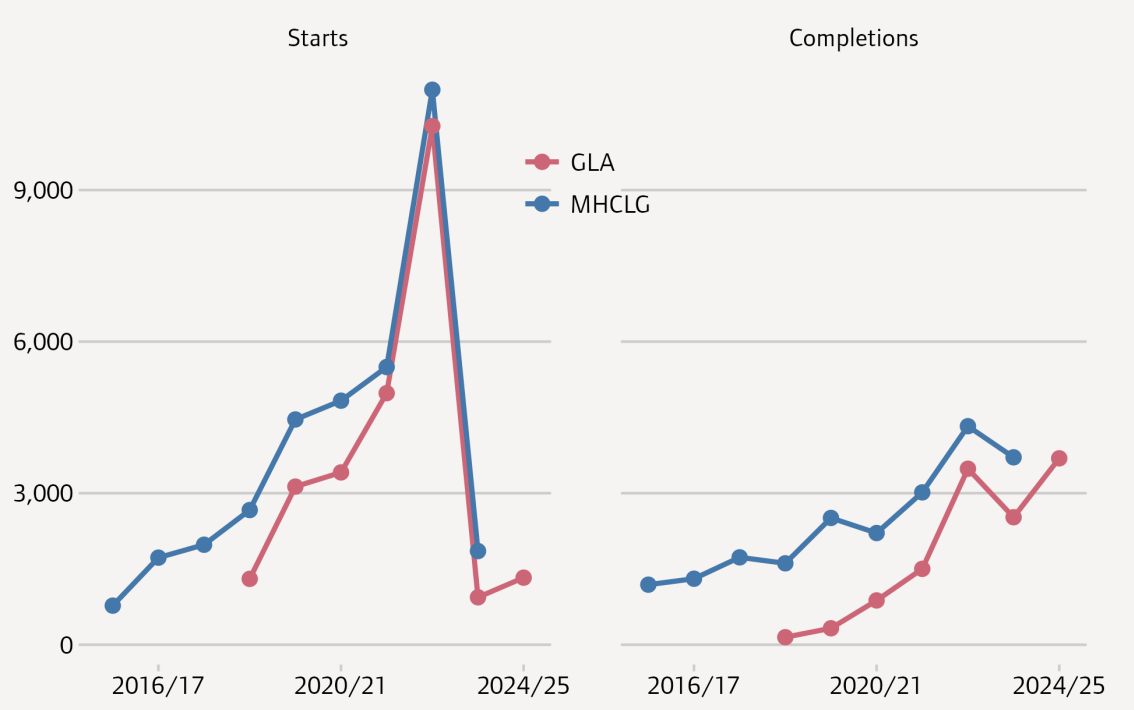


Figure 29 Total number of council homes started and completed by London Boroughs, 2015/16 to 2024/25 (Source: MHCLG data from Live Table 1011 (2015/16-2022/23), and the number of those which were funded through the GLA's affordable housing programmes (2018/19-2023/24))

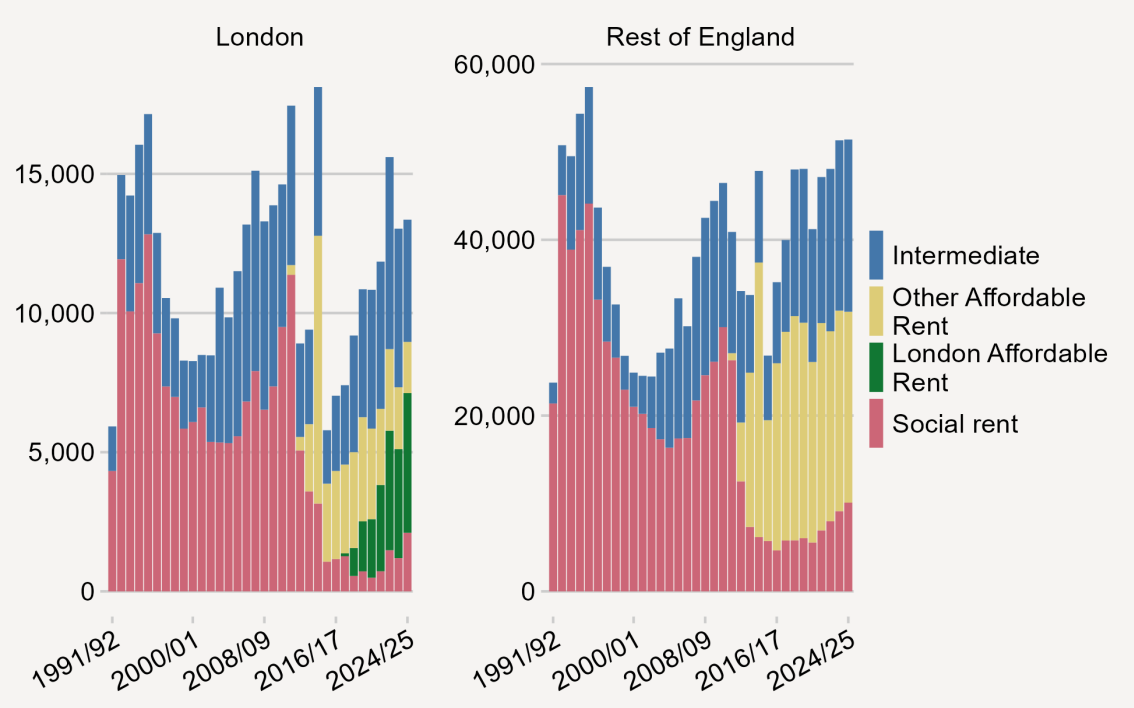


Figure 30 Affordable housing completions in London and other English regions, all funding sources, 1991/92 to 2024/25 (Source: MHCLG affordable housing supply live table 1011. The figures include acquisitions and do not net off losses to the stock and therefore represent gross completions.)

Housing quality remains a concern: 11% of homes in London were below the Decent Homes Standard in 2023, with non-decent homes concentrated in the private rented sector and among older properties. Energy efficiency has improved over time, but only 7.8 percent of existing homes have an EPC rating of A or B, compared to 86% of new builds. Fuel poverty affected 9.4% of London households in 2024, slightly below the England average.

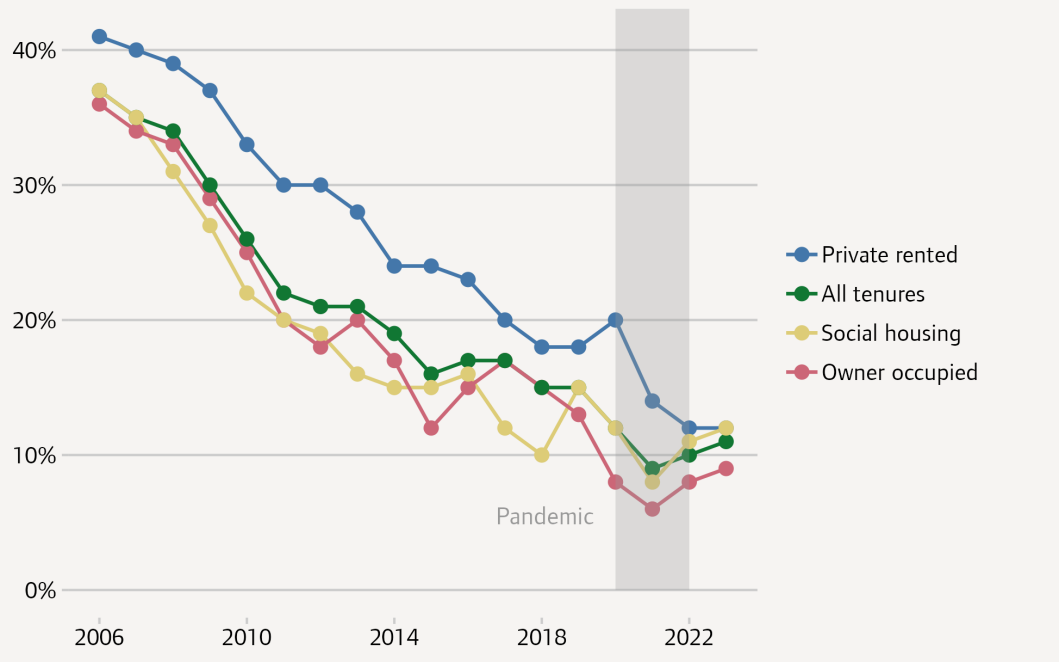


Figure 31 Trend in non-decent homes in London as a share of the total in each tenure (private rented, social housing, owner occupied), 2006 to 2023 (Source: MHCLG, English Housing Survey and English House Condition Survey. Data for 2020 and 2021 was modelled by the ministry as surveyors were unable to carry out internal inspections of properties due to the Covid-19 pandemic, while 2022 data combined modelled and surveyed results.)

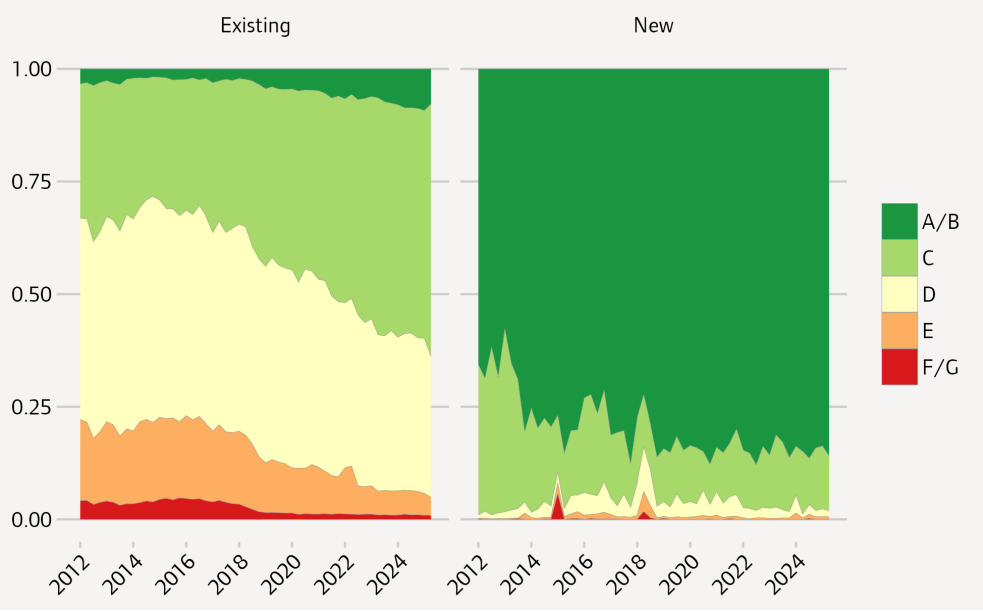


Figure 32 Energy efficiency band of EPCs lodged for new and existing homes in all English regions, 2012 to 2025 Q2 (Source: MHCLG, Live tables on Energy Performance of Buildings Certificates)

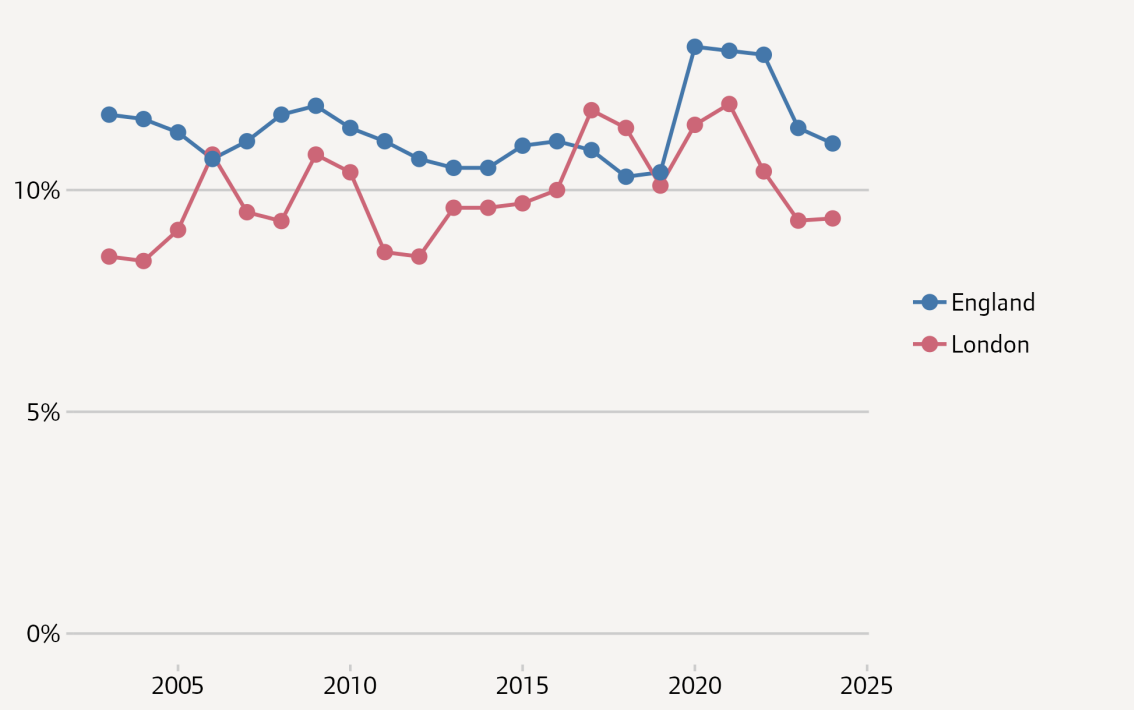


Figure 33 Proportion of households in fuel poverty in London and England, 2003 to 2024 (Source: Department for Business, Energy and Industrial Strategy, Fuel poverty statistics. Fuel poverty is measured according to the 'low-income high costs AHC equivalised income' definition.)

Housing Affordability

Housing affordability is a persistent challenge. Londoners spend a median of 27 percent of household income on housing costs, higher for households including someone with a disability. The percent of income spent on housing costs varies significantly by tenure. Londoners living in the PRS spend a median average of 34 per cent of their income on housing costs, compared with 28 per cent for Londoners living in social rented homes and 18 per cent for owner occupiers.

Private rents remain far above other regions: the average monthly rent for a two-bedroom home in Westminster (£3,320) is more than twice that in Bexley (£1,420). Homeownership is increasingly out of reach for many: first-time buyers now put down an average deposit of £134,000, and interest rates for new mortgages are nearly three times pre-pandemic levels. However, real house prices are falling, with July 2025 inflation-adjusted average prices down 28 percent since their peak in July 2016. This might not reflect better affordability for buyers as the price decrease might simply signal lower purchasing power from buyers.

Figure 34 Median affordability ratio by household disability status and English region, 2023/24 (Source: English Housing Survey)

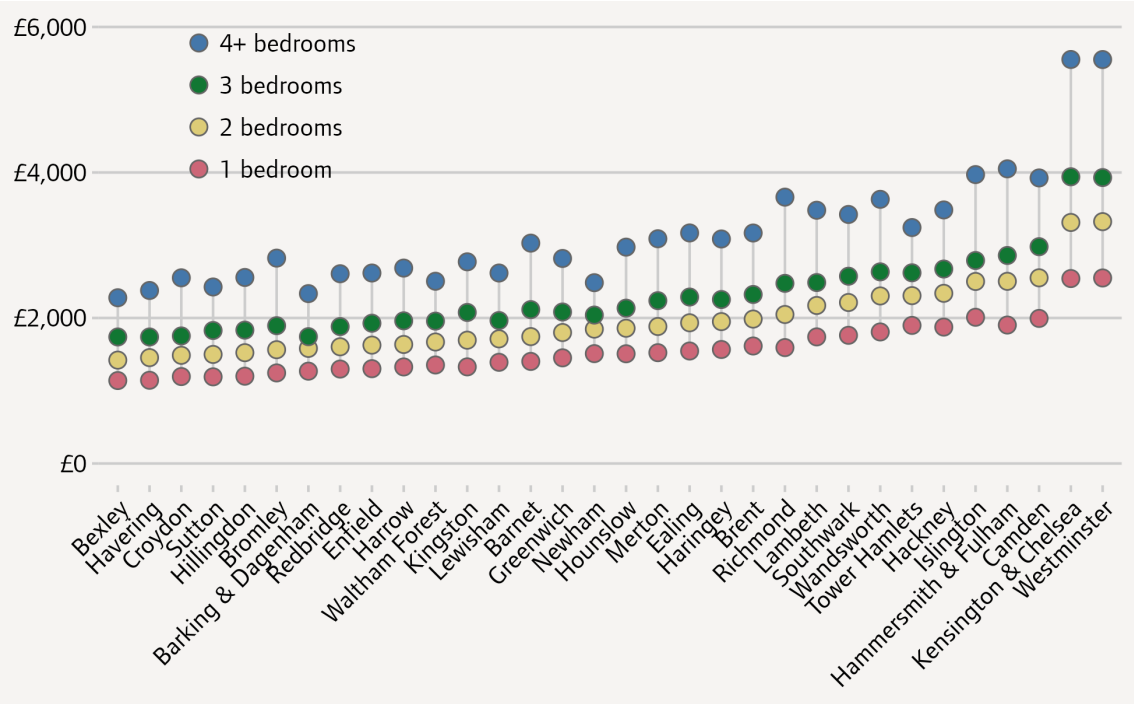


Figure 35 Average monthly private rent by number of bedrooms and London borough, September 2024 to August 2025 (Source: ONS Price Index of Private Rent statistics. These figures exclude any cases where the tenant receives Housing Benefit.)

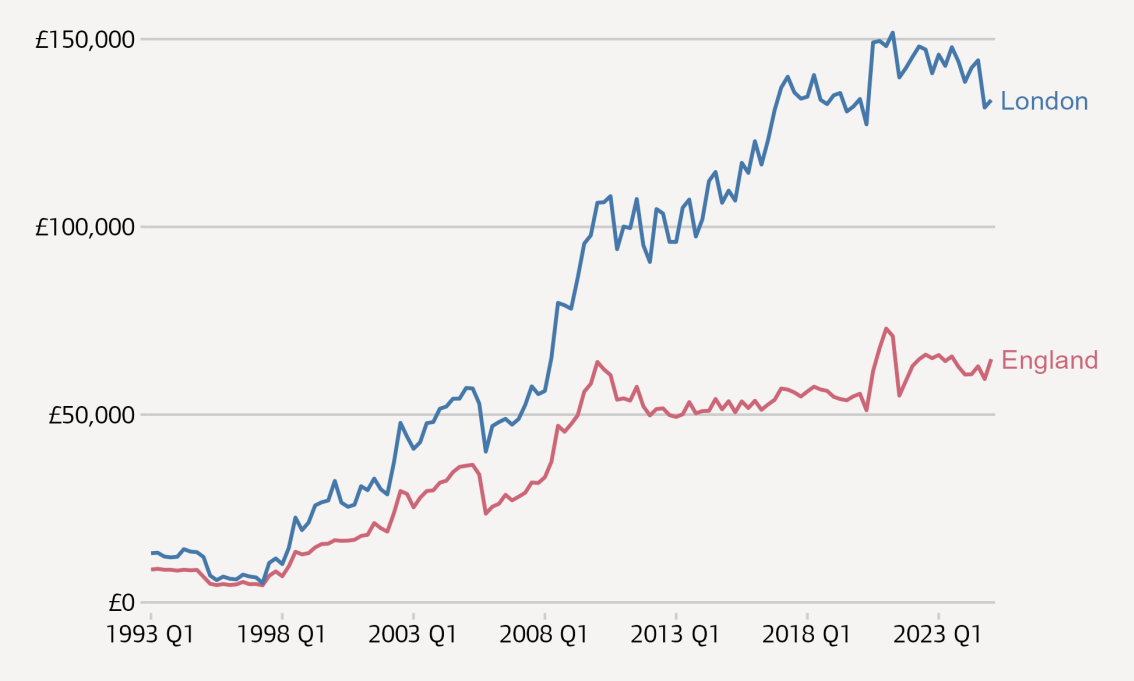


Figure 36 Gap between mean average price and mean mortgage for first-time buyers in London and England, 1993 Q1 to 2025 Q1 (Source: ONS House Price Index quarterly tables. These figures are calculated as the difference between the mean price and the mean advance, and are simple mean averages, unadjusted for inflation or the mix of properties sold. In the last decade an increasing proportion of the gap is likely to be due to the use of Help to Buy.)

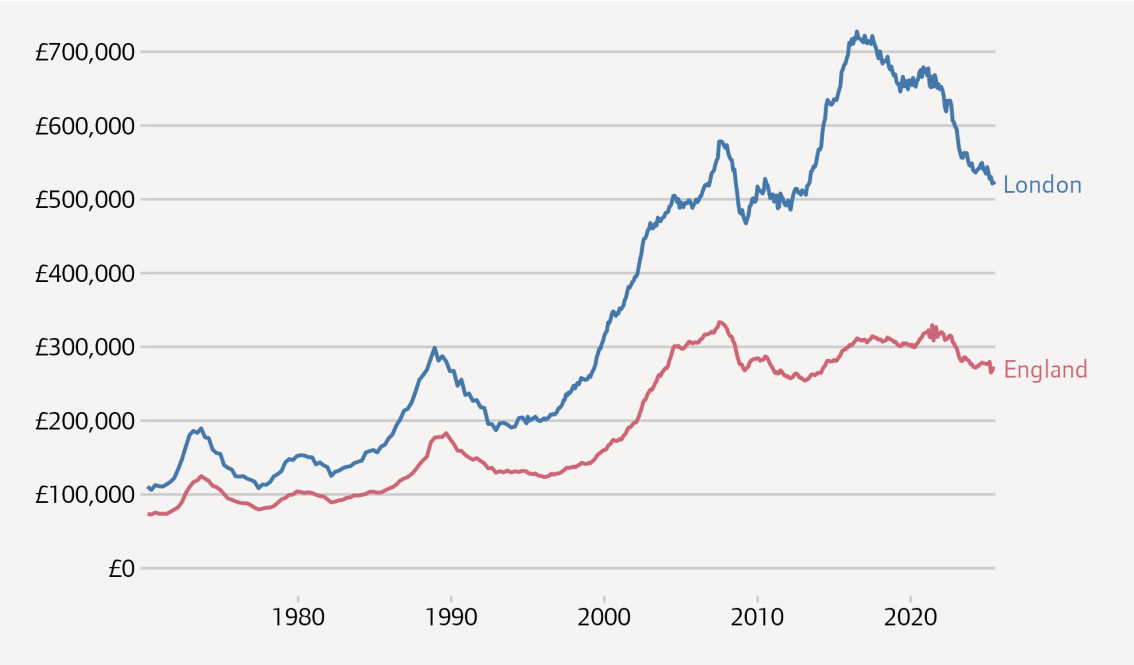


Figure 37 Average house prices in London and England after adjusting for retail price inflation, March 1970 to July 2025 (Source: UK House Price Index (UKHPI) adjusted for retail price inflation. Data is quarterly until the end of 1994 and monthly thereafter. Data for recent months is subject to revision as it is based on a relatively small number of transactions.)

The differences in the amount of income spent on housing costs for Londoners with shared protected characteristics is partly a reflection of different distribution across housing tenures, and partly a reflection of their different incomes. The English Housing Survey data sets out:[65]

- Women spend a higher median proportion of their income on housing costs than men (28 per cent vs 25 per cent respectively).
- Disabled people spend a higher median proportion of their income on housing costs than non-disabled people (29 per cent vs 25 per cent respectively).
- Londoners from Black, Asian and minority ethnic backgrounds spend a higher median proportion of their income on housing costs than White Londoners (32 per cent for Mixed ethnicity Londoners, 30 per cent for Londoners from an Other ethnic background, 29 per cent for Black Londoners, 27 per cent for Asian Londoners, 26 per cent for White Londoners).
- Older Londoners spend a higher median proportion of their income on housing costs than younger Londoners (31 per cent for Londoners aged 65+ vs 25 per cent for 25-34 year olds).

An ONS survey found that 53 per cent of disabled Londoners find it difficult to afford their housing costs, compared with 44 per cent of non-disabled Londoners.[66] Most Deaf and disabled Londoners who responded to a survey by Inclusion London said they struggle to afford housing costs, with a third saying that they had to cut back on food or other essentials to afford housing costs.[67]

Housing Need

Housing need is acute. 73,310 households were in temporary accommodation in March 2025, the highest on record, including nearly 95,000 children. Rough sleeping also reached record levels, with 13,231 people seen sleeping rough in 2024/25. Overcrowding affects 6.7% of households, with higher rates in social and private rented sectors.

The GLA's needs assessment for accommodation-based support for victims/survivors of domestic abuse found that, since 2020/21, the number of households in London owed a prevention or relief duty from homelessness as a result of domestic abuse has increased by 15 per cent. Over the past three years, the London-wide increase in households seeking homelessness relief has outpaced the increase in those seeking homelessness prevention. This suggests that the needs of those requesting housing support due to domestic abuse are increasingly acute by the time they come to the attention of local authorities. Demand for housing support among survivors that are rough sleeping has also risen since the COVID-19 pandemic. The GLA's needs assessment identifies areas of unmet need.[68]

Based on GLA analysis of English Housing Survey data from 2018-2022, seventeen per cent of homes in London have all four basic **accessibility features** necessary to make them 'visitable' by someone with mobility difficulties. However, less than one per cent are 'visitable' while also having the accessible bathrooms, kitchens and lift access that a disabled household might need. Eleven per cent of households in London with disabled members say they do not feel safe at home because they fear a fire might break out, compared to around eight per cent of households with no disabled members. One in four Deaf and disabled Londoners who responded to an Inclusion London survey said that their home is completely inaccessible, meaning that they cannot safely and easily use basic facilities like kitchens, bathrooms and entryways.[69]

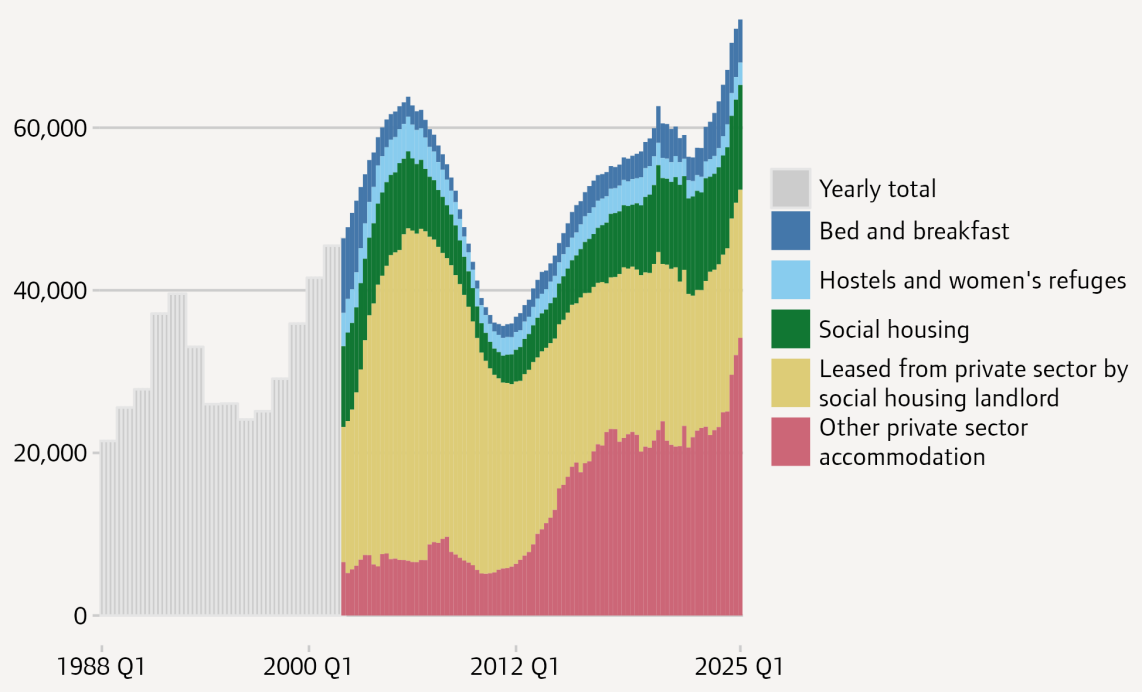


Figure 38 Homeless households placed in temporary accommodation by London boroughs by type of accommodation (bed and breakfast, hostels and women's refuges, social housing, leased from private section by social housing landlord, other private sector accommodation (Source: compiled by GLA from Housing Finance Review 1995/96; UK Housing Review 2004/05; MHCLG live tables 775 and TA1. Children are those aged under 19.)

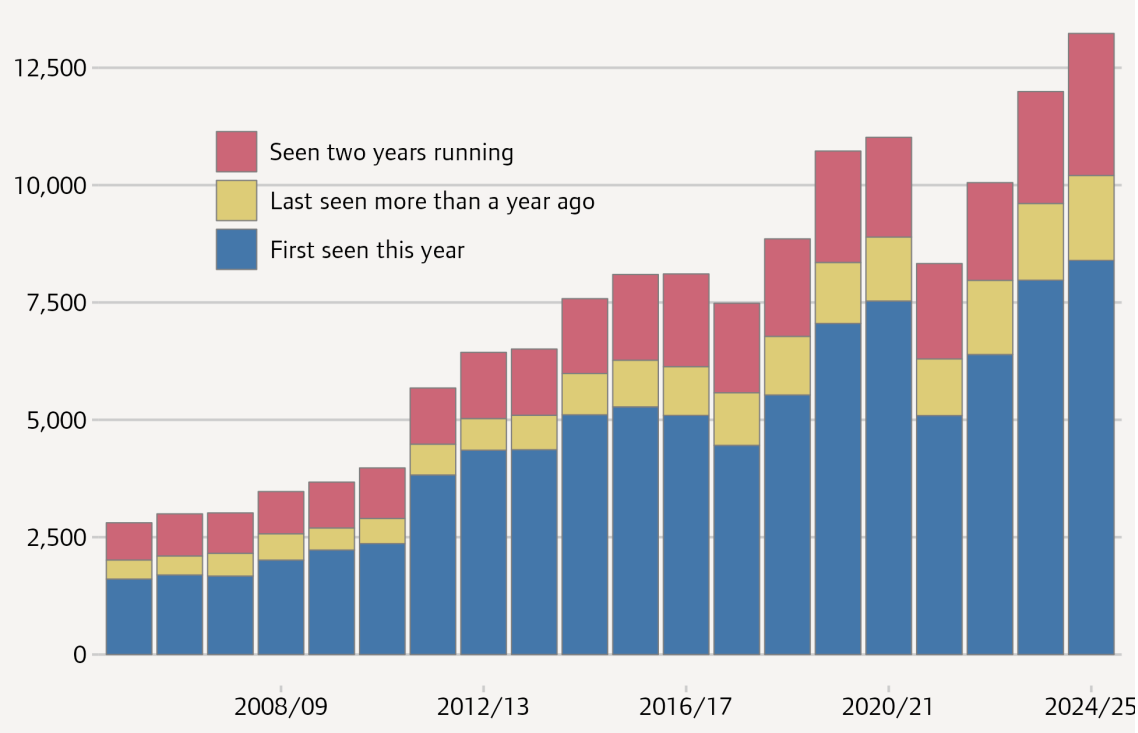


Figure 39 People seen sleeping rough in London, 2005/06 to 2024/25 (Source: Combined Homelessness and Information Network (CHAIN) annual reports 2005/6 to 2024/25)

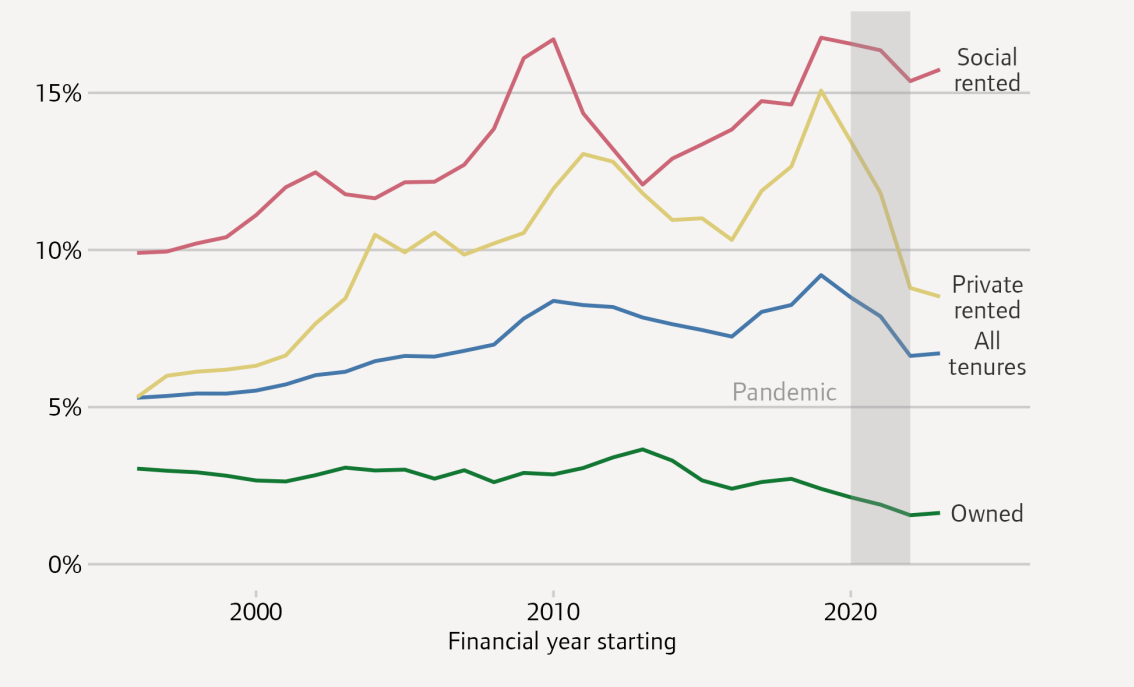


Figure 40 Proportion of households in London overcrowded according to the bedroom standard by tenure (social rented, private rented, owned), 1996/97 to 2023/24 (Source: MHCLG, Survey of English Housing and English Housing Survey data, using three-year rolling averages. Figures for the years 2020/21 to 2023/24 are likely to be under-estimates due to effects of the pandemic on data collection. 2006 definition of bedroom standard and rolling three-year averages used. The shaded area represents the pandemic period.)

Gypsy and Traveller Accommodation

There is an urgent and unmet need across London for site and pitches for London's Gypsy and Traveller communities. In 2024/25, 3.7 per cent of Londoners seen rough sleeping identified as White-Gypsy/Irish Traveller, White- Roma, or Gypsy/Romany/Irish Traveller. In contrast, Census 2021 data estimates that approximately 0.5 per cent of Londoners identified as Gypsy or Irish Traveller, or Roma. While a proportion of London's Gypsy, Roma and Traveller communities have a preference for bricks and mortar accommodation, the provision of Gypsy and Traveller sites in London falls considerably short of demand and much of this need is for social rented pitches. The forthcoming London-wide Gypsy and Traveller Accommodation Needs Assessment will identify borough-level needs figures.

Economic Potential & Employment

London in the global and national context

London is the largest city in western Europe and accounts for around 25 percent of UK economic output. While the UK economy shows signs of stabilisation following the peak of the cost-of living crisis, significant uncertainty remains especially around US trade policy. This reflects ongoing global geopolitical tensions, trade disruptions, lingering inflationary pressures, and weak productivity growth.[70] Despite ongoing risks, London continues to outperform the national average based on its global economic ties, high-value service sectors, and above-average productivity levels.

London also continues to perform highly in indices of global city comparisons, a reflection of sustained interest in the capital as a coveted economic, social and cultural destination. The city remains the UK's most productive region and a global hub for finance, technology, and culture. However, there are long-standing structural challenges. Economic output is growing, but productivity has faltered. While labour

market participation is high, job quality is uneven and income inequality remains pronounced – the richest tenth of Londoners have almost nine times the income (after accounting four housing costs) of the poorest. London's housing affordability problem represents a significant structure barrier to long-term economic growth – high housing costs constrain Londoners' discretionary spending and increase their financial vulnerability. Between 2002 and 2021, median house provides grew twice as fast as wages in London.

London's role as a gateway to international markets it underpinned by the location and capacity of its airports. Airports in themselves are significant catalysts for growth. Through their multiplier effects they facilitate direct and indirect employment, making an important contribution to their local economies, being major employers in their own right and attracting companies whose business depends on air travel into their immediate proximity, as well as through their wider supply chains. Their connectivity and accessibility through their supporting physical infrastructure also facilitates greater business opportunities to the wider UK economy, spreading their multiplier effects further as well as supporting the tourism industry.

Economic growth, productivity, and sectoral performance

Economic growth benefits people in many ways, most importantly through job creation, rising wages, and improvements in living standards. London's economy **rebounded strongly directly after COVID**, but growth has generally been modest. High value industries such as tech, finance, and education have driven in the rebound. This cooling of GVA growth in the past two years is not unique to London but rather reflects the trend of national growth. In 2023 and 2024, London and the UK grew at a similar pace.

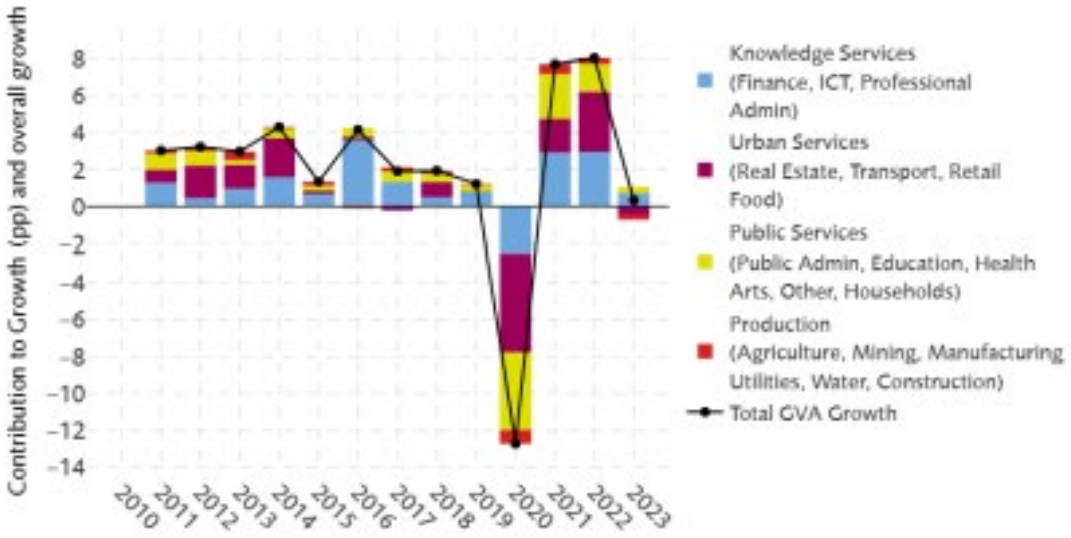


Figure 41 Annual growth contribution by broad industry classifications (Source: GLA analysis of ONS regional GVA data)

Productivity – measured in Figure 42 below by GVA per hour worked - is a key driver of economic growth. There has been a general flatlining of productivity in London following the 2008 financial crisis, and sharp falls since 2019. GVA per hour worked in the capital actually declined by 2.7 percent between 2019 and 2022, against the national picture of an increase of 2.5 percent over the same period. Despite this, London remains the UK's most productive region, with GVA per hour worked 26 percent higher than the UK average in 2022 (£51.70 versus £41.00).

London's **falling productivity** is driven by a combination of factors including but not limited to chronic business underinvestment, unaffordable housing and reduced national public and private expenditure on research and development compared to better-performing G7 economies (London Growth Strategy). It reflects sectoral composition effects, with London's services reliant economy more severely disrupted by the pandemic. Additionally, the rise of remote and hybrid work is although thought to have impacts London's traditional agglomeration advantages – the productivity benefits that co-located, interconnected industries experience.[71]

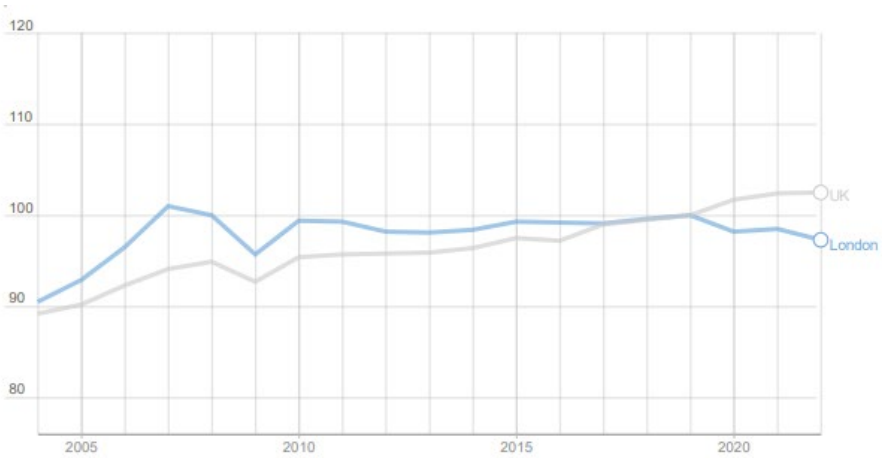


Figure 42 London's productivity, measured by real GVA per hour worked (Source: ONS regional productivity)

The economic recovery post pandemic has been **uneven across sectors**. High-value sectors (such as information and communications, education, professional and technical services) have generally outperformed, while sectors that rely on physical interaction have lagged. In contrast, sectors dependent on physical interaction have seen weaker recoveries. Transport and storage remains nearly 20% below its 2019 level – the largest decline among all industries. Accommodation and food services, arts and entertainment, and human health and social work also remain below pre-pandemic levels, reflecting (in part) persistent structural and behavioural shifts. In non-service sectors, construction output remains nearly 11% lower than in 2019, while manufacturing has increased slightly.

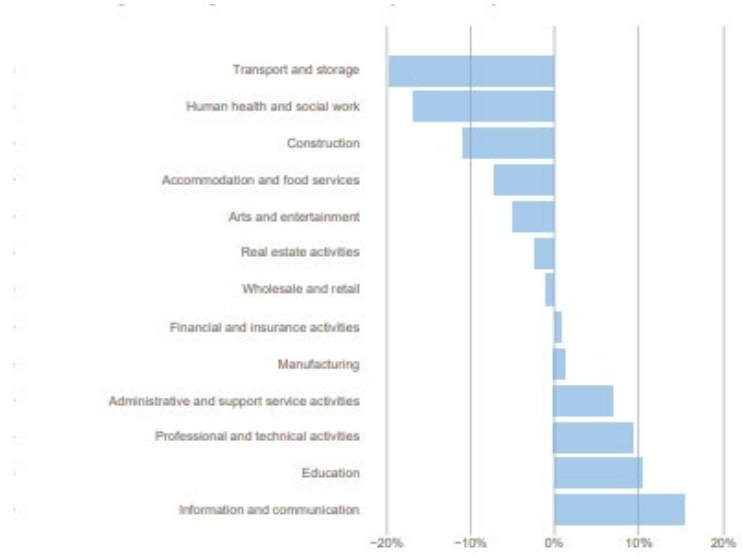


Figure 43 Changes in economic output by industry, measured by percentage change in real GVA by industry in London 2019 to 2023 (Source: GLA Economics using ONS UK regional GVA and GDP data)

Historically, the number of **business births has exceeded closures**, which London's economic dynamism. From early 2022 to mid-2023 the situation was reversed with more business closures than births, however throughout 2024 births have remained above closures with more enterprises entering the market than existing. A similar trend was observed across the UK, although London recovered sooner underscoring the city's strong business resilience.

The **agglomeration benefits** of being based in London are a key feature of its success, and **specialist clusters** are an important aspect of London's economy - clustering sectors in places drives productivity and growth. London is one of the worlds' two **global financial centres** and dominant in professional and business services, and Europe's leading city for **tech**. In recent decades, alongside established areas in the Square Mile and West End, significant new clusters of growth in London have been established at Canary Wharf on the Isle of Dogs; in the Knowledge Quarter around King's Cross; in the east of the centre around Old Street, Clerkenwell and Shoreditch; south at Battersea, London Bridge and the South Bank; and west at White City.

The regeneration delivered by the 2012 Olympic Games created a new economy in Stratford and Hackney Wick. London also has significant commercial office clusters in outer centres like Croydon, Ealing and Kingston. Different sectors cluster in different patterns and many of London's growth sectors cross the boundary of Greater London. For example, **life sciences** tend to cluster in a tight walkable neighbourhood around universities and hospitals, and London's life sciences sector is part of the Golden Triangle with Oxford and Cambridge. The **film and TV production** sector is clustered around a sting of major studios across west London and into neighbouring Her Hertfordshire and Buckinghamshire.

London's **infrastructure capacity constraints** limit growth. Many parts of the tube and rail network suffer significant crowding during peak periods. Energy supply pressures are particularly pronounced in London due to the increasing concentration of data centres and digital infrastructure. Infrastructure constraints create direct productivity drags through increased transport costs, input costs, and time losses while constraining London's ability to accommodate new firms and future growth. Labour market inefficiencies intensify, and agglomeration benefits are eroded. When congestion costs (both in terms of time and money) and input costs exceed agglomeration benefits, London's competitive edge is undermined. The **cost of business space** in London is substantially higher compared to elsewhere, and affordability can be a particular issues for smaller and start-up businesses, and for social, creative, and cultural enterprises.

While **hybrid and flexible working patterns** have become normal in many sectors, uncertainties remain about the impact on the agglomeration of activities in London and the demand for infrastructure. ONS data from 2023indicates that London residents report the highest levels of hybrid working across Great Britain, with 4 in 10 workers both working from home and travelling to work.[72]

Workers in the highest income band, those who were educated to degree level or above, and those in professional occupations were most likely to report home only or hybrid working. Younger workers aged 16 to 24 years had the highest rate of those travelling to work at 79 percent. There was little difference between the proportions of women and men reporting to be hybrid working. Disabled workers reported similar levels of homeworking only compared with those without a disability. Some slight differences were seen between ethnicities. Workers in the Black or Black British ethnic group reported the highest levels of travelling to work without the option to work from home (60 percent), compared with workers in the White British/Irish ethnic group (46 percent).

Culture and the creative industries contribute around £50bn to London's economy every year and account for one in five jobs in the capital. It includes a range of uses and activities such as music and performance venues, visual arts, fashion, film, design, crafts and making, cinemas and museums. Many Londoners and visitors also experience culture through London's public spaces and diverse

communities. London has a thriving creative industries sector and is a leading global exporter in the creative industries. London's 12 Creative Enterprise Zones support affordable workspace for creative businesses and help local people developer skills and access employment in the sector.

The number of international visitors to London has recovered strongly from the pandemic, and at the same time domestic visits remined resilient. Together, these trends suggested sustained interest in London as both an **international and domestic tourism destination**. The total nights spent in London increased from 140.7 million in 2022 to 156 million in 2024 (Source VisitBritain).

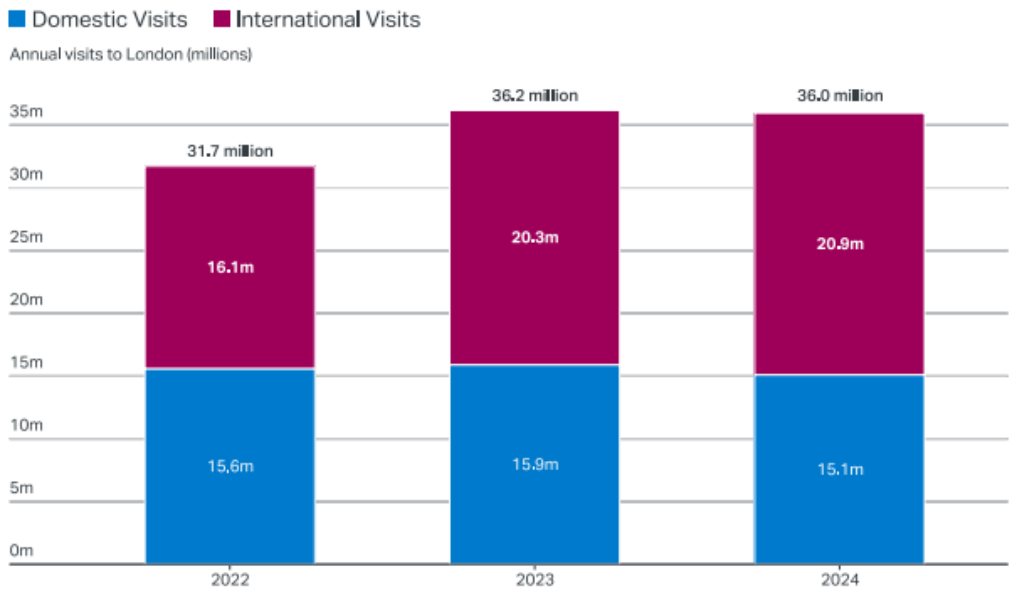


Figure 44 Domestic and international visits to London 2022, 2023, and 2024 (Source: Visit Britain)

London's **night-time economy** is a key element of London's culture. On a typical night there are over two million visitors out and about in the capital between 9pm and midnight, and the capital have over five times as many 24-hour licensed premises than any other city in the UK. London's top 20 hotspots for night-time activity are spread across 16 London boroughs, and more than half are outside the Central Activities Zone.

London's **Low Carbon and Environmental Goods and Services (LCEGS) sector** was worth £54.9 billion to London's economy in 2023/24, based on the value of sales in the sector.[73] This was generated by over 20,000 businesses that employed over 341,100 people in the reporting year. Historically, the LCEGS sector has a higher growth rate in London than the UK. The five largest sub-sectors are carbon finance, wind, geothermal, buildings technologies, and alternative fuels.

Labour Market, jobs and earnings

Jobs growth has outpaced London's working age population growth over the last 20 years. Workforce jobs were 6.4 million in 2024, an increase of 1.7 million in 20 years (Source ONS Workforce Jobs and Annual Population Survey). The latest ONS Workforce Jobs data indicates the number of jobs has grown beyond pre-pandemic levels by the growth rate remains below the pre-pandemic trend. The growth was driven by broad-based growth across all sectors, with particularly strong growth in jobs in the knowledge-intensive service and public service sectors. Sectoral changes in workforce jobs have had similar shifts to those in sectoral output shares.

Between December 2024 and February 2025, London's employment rate fell by 1.4 per cent, according to the ONS Labour Force Survey. This is an "Official Statistic in Development" and should be treated with caution due to data quality concerns since mid-2023.

The proportion of working age population without qualification has been falling slightly over time. ONS data show that 5 percent of the 16-64 population in London hold no formal qualifications, compared to 7 percent in 2015. Compared to the UK average, London's working age population is **relatively highly qualified**. In 2023, three-quarters (75%) of 16-64 year-old Londoners held a Level 3 or above qualification (equivalent to two A level qualifications or higher, including degrees), higher than for the UK overall (68%).

Youth unemployment in London (16- to 24-year-olds) is consistently higher than pre pandemic levels and has been rising. The ONS (2023) estimated that 14.6% of Londoners aged 16 to 24 were not in education, employment, or training (NEET). This is higher than the rate for England.

Recent years have seen significant shifts is the **supply of labour at all skill levels**. Brexit led to significant changes in London's migration patterns and led to labour shortages in key sectors such as construction and hospitality. Tighter immigration rules coming into force, including changes to visa eligibility and family accompaniment, may reduce the supply of workers in industries such as health, construction, and hospitality. Despite higher net migration than before Brexit, businesses consistently say that lack of skills and talent is the biggest barrier to growth.[74]

In July 2025, London's employment rate stood at 74.9% and its unemployment rate was estimated at 6.2% (GLA Economics – London Labour Market Update July 2025). While the employment rate is high by historical standards, there is variation in the quality of jobs held by many Londoners. GLA Economics **job quality** score examines various dimensions of job quality such as pay, contract type, hours, and progression along with an overall 'average job quality score'. This suggests a slight decline in job quality since 2020. According to ONS Labour Force Survey data, approximately 57% of employed residents report positive opportunities for progression, and nearly one in five cite irregular or insecure working hours. Around a third of workers regularly perform unpaid overtime.

The job score is lower for London than the UK, and the largest contribution to the gap comes from the difference is the shore of employees in low pay. While incomes are higher in London, so is income inequality. **In-work poverty** is a growing problem in London. There are twice as many Londoners in poverty in working households than in workless ones. Research by the Social Market Foundation found common problems and drivers of low earnings, insufficient hours, high and rising living costs (especially housing), and caring responsibilities.[75] The **London Living Wage** (LLW) rate is calculated annually based on actual living costs and is currently set at £14.80 per hour.

Pay gaps exist because one group is paid, on average, less than another group. As with the UK, London evidences gender, ethnicity, and disability pay gaps. The gender and ethnicity pay gaps have been narrowing over time in both geographical areas.[76]

- On average, female employees are paid less per hour than male employees (15 percent less in 20214 in London and 13 percent across the UK).
- There is a large gap in the median hourly pay between White employees and Black, Asian and minority ethnic employees in London (23 percent) compared with across England and Wales outside London (around 1 precent). This is at least partly attributable to the fact that London has a much larger proportion of Black, Asian and minority ethnic employees among its workforce than the rest of the country, while London wages also tend to be higher than elsewhere.
- In 2022, the pay gap between disability and non-disable workers, based on median pay, is estimated at 10 percent in London and 14 percent. In recent years the disability pay gap in London has fallen below the disability pay gap for the UK.

A quarter of London's workforce (1.32 million people) regularly **work at night** (between 6pm and 6am). While four in five workers in night time industries receive at least the LLW, they remain more living on average to be paid below the LLW than those in other industries. Over a third of young workers work nights: 34 percent of workers aged 16-20 were night workers in 2023, while the share was 38 percent for those aged 21-25.[77]

Key Locations

London's economic activity is primarily focused in the Central Activities Zone, town centres, high streets, and industrial areas in terms of the provision of physical floorspace needs. Notwithstanding this, economic activity takes place in a range of settings including public sector, social and community facilities which tend to be located within the neighbourhoods they serve, within people's homes, and at a range of on-the-job locations such as construction and many trades.

The **Central Activities Zone (CAZ)** comprising the Square Mile, West End and Northern Isle of Dogs (Canary Wharf) is a dense mix of global financial centre, globally significant visitor destinations, world-class culture and office space. It contains a unique concentration and mix of business, cultural, shopping and entertainment uses. It includes places like the West End, Oxford Street, the City of London, South Bank and Knightsbridge. Around a third of London's jobs are within the CAZ. Together with the Northern Isle of Dogs, it generates more than 11 per cent of the UK's economic output. These areas are also home to almost 300,000 residents.

London's largest agglomerations of **office** functions are located within the CAZ including the Northern Isle of Dogs, complemented by diverse office markets in town centres across the capital alongside a range of urban business parks. Since the pandemic, demand (take-up) for office floorspace in Central London was back to the 10-year average level in 2022, whilst falling back slightly in 2023 in town centre office markets outside of CAZ, vacancy rates have increased since the pandemic, most notably in Hammersmith, Croydon and Ealing town centres (see Figure 62). With office vacancy rates of around 5 per cent, Kingston and Stratford town centres appear to have been impacted by the pandemic to a lesser degree.

Looking towards future prospects, agents report[78] that the flight to quality will sustain demand for the best offices in London, particularly as the requirement for buildings with strong environmental credentials increases together with occupiers adapting to more flexible working arrangements following the pandemic. With fewer new builds expected in the short term, more refurbishment will be necessary to upgrade energy inefficient stock.

London has a network of over 240 **town centres** and more than 600 **high streets**, each performing different roles and functions. Ninety per cent of Londoners live within a ten-minute walk of a town centre or high street. Many Londoners work in London's local economies, particularly in the everyday economy sectors like care, construction, retail and hospitality. These local economies offer jobs close to home and are often the first step into work for people who have struggled with employment.

Evidence suggests that as much as 45% of Londoners use their high streets for primarily non-retail purposes. This illustrates the importance of these places for their social, community and cultural value, as well as a place to consume. Although some of London's high streets are highly successful, others are struggling and all face a number of long-term challenges. Economic restructuring, changes in consumer demand, reduced public sector budgets and climate change have all made the challenges of the pandemic more acute.

Footfall in 90 per cent of London's town centres and high streets grew in 2024, across both daytime and nighttime periods. Spending also increased: Inner London saw higher daytime spend, while Outer London saw more nighttime spend. Vacancy rates improved, with London's rate at 9.6 per cent, compared to 10.5 per cent across the UK. A lower vacancy rate indicates a healthier high street environment, with more active businesses and stronger consumer engagement. While rates in Inner

London were similar to the London-wide average, Outer London high streets and town centres had a lower vacancy rate on average of 8.6 percent.

A total of 6,800 hectares of **land was in industrial use** in London in 2020. Designated Strategic Industrial Locations are London's main reservoir of industrial land with approximately half of London's total supply[79]. Since 2001, the total stock of industrial land has progressively declined by 1,500 ha - an 18 per cent contraction over 19 years to 2020. Between 2015 and 2020, the decline has been 355 ha or 5 per cent over 5 years. All subregions have exceeded the recommended release of industrial land.

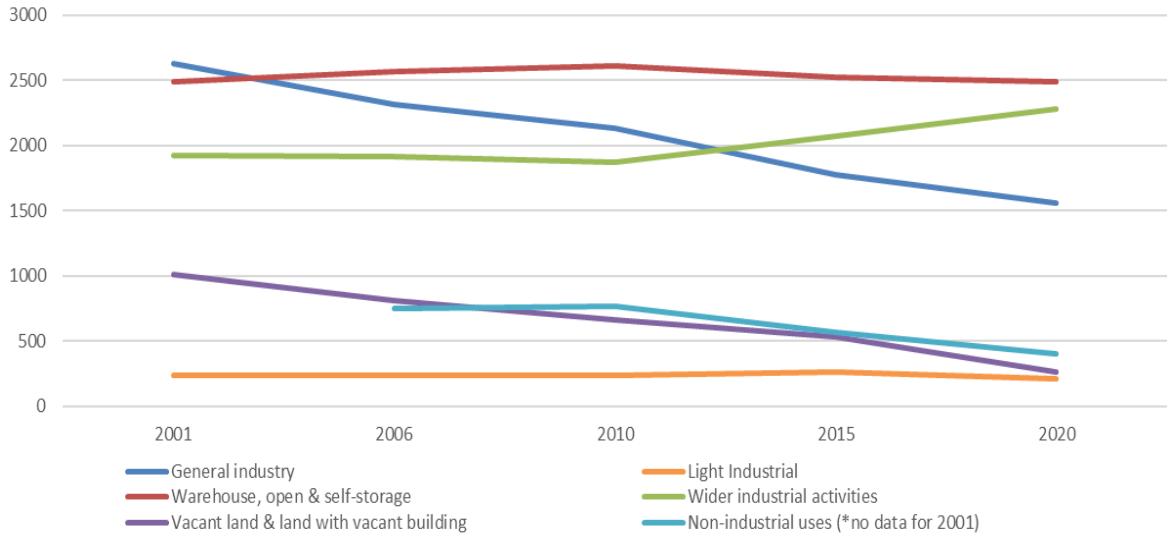


Figure 45 Land (hectares) in specified industrial use (Source: London Industrial Land Supply Study 2023)

The majority of employment in industrial activities in London is concentrated in Outer London, with only about 18% in Inner London. Employment in industrial jobs has increased between 2001 and 2019, reversing a previous longer-term decline.

There are estimated to be 56,700 total industrial business units in London in 2020, although smaller industrial businesses not registered for either VAT or PAYE are not included. These are 11 per cent of all business units, and 74 percent of them are in Outer London. Over 90 per cent have 0-9 employees, similar to all businesses in London. There is a broad spread across size ranges in 2021 with 84 per cent of all buildings being small to medium sized (between 1k and 50k sqft). A much smaller proportion (2.5 percent) is in the 100,000 sqft + category.

In 2021 the industrial floorspace vacancy rate was 3.2 per cent, well below the reasonable average rate of frictional vacancy of 8 per cent. Hackney, Harrow, Hounslow, Kensington and Chelsea and Richmond all have rates below 2 per cent. In 2020 the land vacancy rate is 4 per cent, still below the frictional vacancy rate of 5 percent. Land vacancy rates are close to 0 percent in Camden, Barnet, Wandsworth and Harrow. East London has higher land vacancy rates, including 18.3 percent in Newham, and rates above 10 percent also seen in Bexley, Greenwich, Barking and Dagenham and Havering.

The significant growth in demand for big box, distribution stock is fuelled by changing consumer habits and the growth of e-commerce. This has focused on key locations with good access to the strategic road network including Ealing, Barking and Dagenham and Enfield. This demand is expected to be exacerbated by a growing market for non-traditional B-class uses including Film and TV production / post-production with similar requirements for large floorplate space in Outer London. In addition, the changing nature of consumer habits and industrial trends indicate that demand is growing for example

for final mile distribution space with building typologies different to traditional ones, including smaller floorplates and close proximity to residential areas.

Beyond London's boundary, in 2021 over 17k ha of industrial land was identified within strategically important clusters in the Wider South East (WSE), with the most significant in Thurrock, East Suffolk and Milton Keynes. Thurrock has also seen the greatest rise in floorspace. The WSE has a greater proportion of larger stock (over 50,000 sqft) while London has a greater proportion of small-sized stock (under 2,500 sqft). WSE rental and capital values, even in close proximity to London, are still largely below London average values.

Air Quality

Since 2016, London's air quality[80] has improved dramatically, and the number of Londoners living in areas that exceed the UK's legal air pollution limits has decreased significantly.[81] However, 100% of its residents still live in areas where pollution exceeds the recommendation of the World Health Organization (WHO) of PM2.5 particulate matter – extremely fine particles able to enter deep into the lungs.[82] Despite substantial progress, the latest modelling shows that without additional action, all Londoners will still be living in areas exceeding the WHO guidelines AQGs for both NO2 and PM2.5 in 2025 and 2030.

Continued action is required, as relatively small increases could bring areas home to hundreds of thousands of Londoners back over the legal limit. An increase of just 1 µg/m3 from 2019 levels of NO2 would result in an additional 68,200 people living in areas exceeding the legal limit. An increase of 2 µg/m3 would result in a return of a further 156,000 people living in areas exceeding the legal limit. There is strong evidence linking adverse health impacts to levels of NO2, PM10 and especially the smaller-sized PM2.5. These pollutants have well-documented health and economic impacts that fall unequally on those least likely to contribute to the problem.

Nitrogen dioxide (NO2)

Average concentrations of nitrogen dioxide (NO2) were much higher in London than the rest of the UK in 2016 – and yet have fallen much more steeply in London compared to the rest of the country. Annual roadside NO2 concentrations across London dropped by nearly half (49%) between 2016 and 2023, compared to 35 percent in the rest of England, 39 percent in Scotland and 31 percent in Wales over the same period.[83] The average annual mean roadside and urban background concentration of NO2 in 2024 (based on provisional data) was 24.45 µg/m3 and 17.66 µg/m3 respectively which are the lowest levels recorded in London over this period.

Urban background NO2 concentrations are generally lower than roadside concentrations due to the distance from the main pollutant source (i.e., vehicular traffic on roads). The averages were calculated from air quality monitoring sites in Central, Inner and Outer London, between January and December 2024. For both site types, the averages are well below the requirements of UK legislation (the Air Quality Standards Regulations 2010 state that the annual average concentration must not exceed 40µg/m3) but remain well above the WHO Air Quality Guideline target of 10µg/m3.

The number of air quality monitoring stations in London recording NO2 has increased from 123 in 2016 to 149 in 2023. According to the GLA's Air Quality in London 2016-2024 report there has also been a 99% reduction in the number of hours when NO2 concentrations exceeded the UK's hourly legal limit since 2016 – dropping from 4,130 hours in 2016, to just 22 hours in 2023. New data from London's more than 150 reference-grade air quality monitoring sites[84] also show the capital has made significant progress towards reaching the UK's legal air pollution limits. The number of monitoring sites across London exceeding the UK's annual legal limit for NO2[85] has decreased from 56 sites in 2016 to just five in 2023.

Compared to 2019, total NOx emissions reduced by 23% in Greater London in 2022. The largest reduction in (tonnes of) NOx emissions is from road transport in London, with a decrease of more than 5,000 tonnes. This equates to a reduction of 30% in road transport emissions across London between 2019 and 2022. Total NOx emissions across London are forecast to be 12% lower in 2025, and 29% lower in 2030, compared to 2022 emission levels. The largest reduction in NOx emissions is forecast to come from road transport in London. Road transport NOx emissions are expected to reduce by 38% across London by 2025 and 68% by 2030, compared to 2022, as the vehicle fleet continues to become cleaner, accelerated due to schemes such as the ULEZ.

Following the increase in forecast road transport emissions due to the revision of traffic volume statistics from DfT, by 2025 road transport will still be the dominant source of NOx across London (30% of total NOx), although closely followed by the industrial and commercial heat and power generation source category (28%). However, by 2030, it is still expected that the latter will overtake road transport as the main source of NOx across London.

Particulate matter (PM2.5 and PM10)

Particulate Matter (PM) refers to particles in the air that are not a gas, consisting of various chemical compounds and materials. In an urban environment, PM is produced by a variety of activities such as construction, vehicle exhaust emissions, and road dust resuspension. Based on current evidence, PM2.5 is thought to be the air pollutant that has the greatest impact on human health. Both short and long-term exposure to PM2.5 increases the risk of mortality from lung and heart diseases as well as increasing hospital admissions. Children growing up exposed to PM2.5 are more likely to have reduced lung function and develop asthma.

The annual mean roadside concentration of PM2.5 in 2024 (based on provisional data) was 8.67 µg/m3, which is the lowest level recorded in London over the period 2015 to 2024. The annual mean urban background concentration of PM2.5 in 2024 (based on provisional data) was slightly higher than in 2023 at 8.22 µg/m3. As is the case for NO2, PM2.5 concentrations in the urban background are also lower than those in roadside areas, albeit marginally and the difference has reduced over time.

The averages were calculated from air quality monitoring sites in Central, Inner and Outer London, between January and December 2024. For both site types, the averages are well below the requirements of UK legislation (the Air Quality Standards Regulations 2010 state that the annual average concentration must not exceed 20µg/m3) but remain above the WHO Air Quality Guideline target of 5 µg/m3.

While strong progress has been made for NOx and PM2.5, the total emissions for PM10 have remained stable, indicating that there is still further work to be done to reduce emissions. In 2022, total PM10 emissions in London remain at a similar level as in 2019. Whilst a strong reduction was seen for estimated road transport emissions of 14% in 2022 compared to 2019, this was counterbalanced by an increase in estimated construction dust emissions (11 percent), due to increased construction activity particularly in central London, although it is important to note that construction emissions estimates are subject to significant uncertainty, inherent to the methodology and data used to calculate emissions.

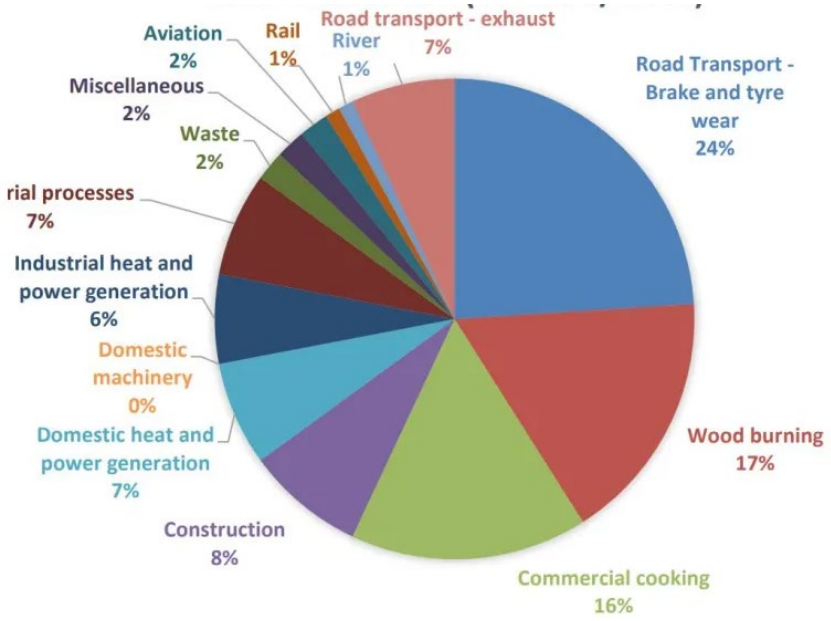


Figure 46 All sectors contributing to PM2.5 emissions in London, percentage contribution in 2019 measured by tonnes per year

In 2022 construction emissions contributed the largest single source of PM10 accounting for 33% of total emissions in London, followed by road transport at 25% and resuspension at 16%. Despite not being the largest source, the largest reduction in (tonnes of) PM10 emissions is from road transport in London, with a decrease of about 300 tonnes. Total PM10 emissions across London are forecast to be 7% lower in 2025, and 12% lower in 2030, compared to 2022 emission levels.

Biodiversity and Natural Environment

Note information in this section is subject to updates published as part of the forthcoming London Local Nature Recovery Strategy in early 2026.

London has a long history of being a green city, boasting rich and varied landscapes and important habitats. Today, it is one of the world's greenest cities, becoming the first National Park City in 2019. Around half of London's area is 'green'. Around a third of this green space is natural habitats and around 14 percent is vegetated private garden land. Over 2.5 percent of London is made up of blue space, such as rivers, canals, and reservoirs.[86]

The richness of London's natural environment includes private gardens, parks and open spaces and green corridors along canals and railways as well as on the River Thames and its tributaries. There is evidence of psychological, physical and social benefits of proximity to, and engagement with, the natural environment. Vegetation, particularly trees, can contribute to air quality improvements and help to reduce the effects of the urban heat island. Increased vegetation also helps to reduce surface run-off.

Natural spaces offer Londoners places to relax, exercise, play, and connect with the city's natural heritage and culture. They also serve as essential habitats for wildlife, help protect the people who live and work here from the effects of climate change and play a role in improving air quality. London's parks, woodlands, nature reserves, wetlands and community gardens help keep London cool, reduce the risk of flooding, provide homes for wildlife and allow Londoners to enjoy nature. Despite its importance, nature is in decline globally and the UK is among the most nature-depleted countries in the world.

Protected Habitats

There are three Special Areas of Conservation (SACs), two Special Protection Areas (SPAs), and two Ramsar sites (wetlands of international importance) in London:

- Richmond Park SAC located within the London Borough of Richmond upon Thames and immediately adjacent to the London Borough of Wandsworth and the Royal Borough of Kingston upon Thames.
- Wimbledon Common SAC located in the London Borough of Wandsworth and the London Borough of Merton and immediately adjacent to the Royal Borough of Kingston upon Thames.
- Epping Forest SAC located in the London Borough of Waltham Forest, the London Borough of Redbridge and Epping Forest District; hence partially inside and outside the GLA boundary.
- Lee Valley SPA and Ramsar site located in the London Borough of Waltham Forest, Epping Forest District and the Borough of Broxbourne; hence partially inside and outside the GLA boundary.
- South West London Waterbodies SPA and Ramsar site located in the London Borough of Hounslow, the Borough of Elmbridge, the Borough of Runnymede, the Borough of Spelthorne and the Royal Borough of Windsor and Maidenhead; hence partially inside and outside the GLA boundary.

Outside London, the following habitats sites are also considered because there is potential for impacts stemming from the London Plan to create significant effects:

- Thames Estuary and Marshes SPA and Ramsar site, located 8.3 km from GLA boundary. Within Medway District Council, Gravesham Borough Council, and Thurrock Borough Council areas.
- Burnham Beeches SAC located 8.7 km from GLA boundary. Within South Buckinghamshire District Council area.
- Mole Gap to Reigate Escarpment SAC located 5.3 km from GLA boundary. Within Mole Valley District Council and Reigate and Banstead Borough Council areas.
- Wormley- Hoddesdonpark Woods SAC located 3.7 km from GLA boundary. Within Broxbourne Borough Council, Welwyn Hatfield Borough Council, and East Hertfordshire District Council areas.
- Windsor Forest and Great Park SA located 5.7 km from GLA boundary. Within Royal Borough of Windsor and Maidenhead, Bracknell Forest Borough Council, and Runnymede Borough Council areas.
- Thames Basin Heaths SPA located 7.5 km from GLA boundary. Within Bracknell Forest Council, Surrey Heath Borough Council, Woking Borough Council, Guildford Borough Council, Rushmoor Borough Council, Waverley Borough Council, and Hart District Council areas.
- Thursley, Ash, Pirbright & Chobham SAC located 11.0 km from GLA boundary. Within Surrey Heath Borough Council, Guildford Borough Council, Woking Borough Council, and Waverley Borough Council areas.

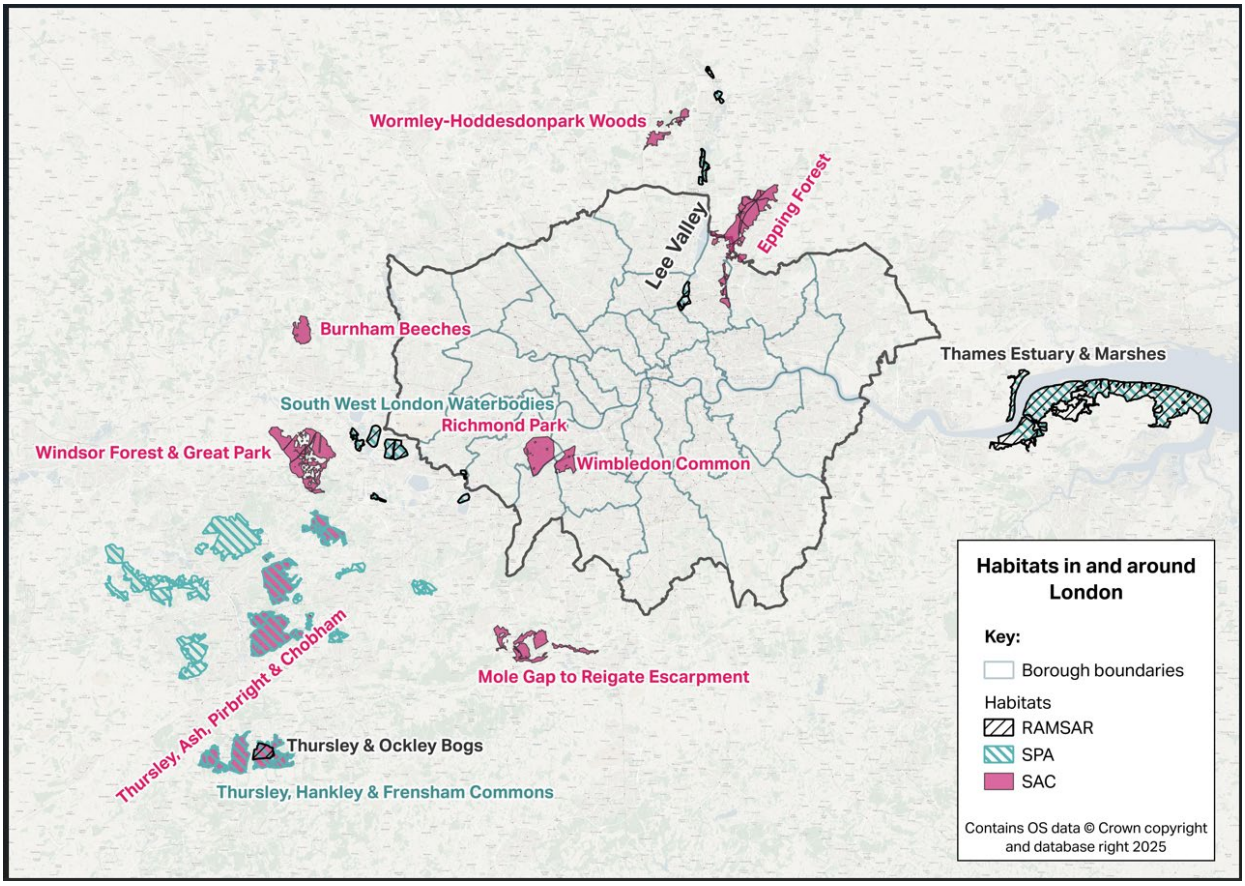


Figure 47 Sites (RAMSAR, SPA, SAC) relevant to the Habitat Regulations for London (Source: GLA)

More detailed information about the European sites, their qualifying features and specific conservation objectives is provided in the Habitats Regulation Assessment (HRA) report that will accompany the new London Plan.

London also has nationally important nature conservation sites. These include three National Nature Reserves and 37 Sites of Special Scientific Interest (SSSI), 30 of which are designated for their biological interest. At a local level, London has 154 Local Nature Reserves, covering a variety of habitats and species.[87] Areas of Ancient and Semi-natural Woodland can be found in 17 boroughs. Areas of Ancient Replanted Woodland can be found in 10 boroughs.

London's Sites of Importance for Nature Conservation

Other important wildlife sites in Greater London are identified as Sites of Importance for Nature Conservation (SINCs). This is a non-statutory designation, but SINCs are still afforded a high level of protection within the planning system. The amount of area covered by SINCs in London provides an indication of the extent of wild spaces across London.

As of March 2025, data compiled by Greenspace Information for Greater London (GIGL) finds that in total 1,696 SINCs have been identified, and the total area designated as SINC in London is 31,666 hectares, up slightly from 31,470 hectares in 2024[88]. GIGL's data[89] (and the forthcoming Local Nature Recovery Strategy for London) indicates that between 2013 and 2024, there was an increase of just over 950 hectares in land designated as SINC (with 114 sites added), increasing the coverage of London from 19.2% to 19.8%.

SINCs are variously graded as Metropolitan, Borough and Local depending upon the relative importance and value of the SINC:

- Sites of Metropolitan Importance – More than 140 of these sites, which are of regional significance for nature, have been identified, covering nearly 10% of London. Examples of these sites include Ruislip Woods, Ingrebourne Marshes and Farthing Downs.
- Sites of Borough Importance – they include woodlands, rivers, grasslands and mature parks with ancient trees and meadows – almost 800 of these have been identified, covering an area of 12,000 hectares.
- Sites of Local Importance – include publicly accessible parks and green spaces with a local intrinsic nature conservation value. Around 460 of these sites have been identified, with a total area of 1,700 hectares.

While the distribution of designations between the different SINC grades (Metropolitan, Borough and Local) has largely stayed the same, there has been a small but notable increase in Local SINCs, which have increased in area by around 10%. Borough SINCs have increased in area by just over 5%, but there has been less than one per cent increase in Metropolitan SINC coverage.[90]

London's Priority Habitats

The London Environment Strategy[91] identifies ten priority habitats[92] in London, as set out below. These are the most threatened and in need of restoration:

- Acid grassland
- Chalk grassland
- Lowland meadows
- Rivers and Streams
- Coastal and floodplain grazing marsh
- Fen, marsh, and swamp
- Reedbeds
- Heathland
- Open mosaic habitats on previously developed land
- Orchards

Between 2000 and 2014, almost 39,000 ha of habitat were reported as having been enhanced in London and over 18,000 ha of habitat restored. Examples include creation of over 600 ha of new woodland in Thames Chase on London's eastern fringe; the creation of reedbeds in the central London Royal Parks; the expansion of 3.5 ha of heathland at Mitcham and West Wickham Commons; and the creation of 45 ha of various biodiversity action plan habitats in the Queen Elizabeth Olympic Park.[93]

London's species

London is home to more than 18,000 species, including protected and rare species.[94] London is thought to host around half the British population of greater yellow-rattle and around a quarter of Britain's black redstarts.[95] London has internationally important sites (designated as SACs, see above) for stag beetle (Lucanus cervus) at Epping Forest, Wimbledon Common and Richmond Park. London is also home to internationally important populations of great bittern, gadwall and northern shoveler in SPAs.

The British Trust for Ornithology calculated population trends for 33 bird species in London and surrounding areas for the period 1994 – 2011. Over that time, 21 of the 33 species increased significantly. Five species declined significantly in the region during this same period (blackbird, grey heron, house sparrow, mistle thrush, song thrush, starling and swift), generally mirroring national trends. Loss of nest sites in buildings (resulting from the trend to seal buildings for energy efficiency reasons) and the loss of vegetated areas in gardens may help account for the decline is species such as house sparrow, starling, blackbird and swift.[96]

Tailored conservation efforts for certain species that have an urban or London affiliation have achieved notable successes. The creation of biodiverse green roofs, for example, in areas where black redstarts are known to breed seems to have maintained the London breeding population (despite redevelopment of many former wasteland sites where they bred). Likewise, the provision of nest boxes and protection of nest sites has resulted in an increase in the number of breeding pairs of peregrine falcons. These are now found in most parts of London.[97]

London's green spaces

Green spaces in London range from wetlands, to woodlands, heathlands, and Richmond Park and are home to more than 15,000 species. As a highly urbanised area, it is important to recognise how these green spaces contribute to London's biodiversity. London has over 2,000 community gardens,[98] 12 city farms[99], and more than 740 allotments with over 40,000 plots.[100] A recent survey of food growing sites such as community gardens and allotments found that these sites provide significant habitat for nature.

Greenspace Information for Greater London CIC (GIGL), the capital's environment records centre, has developed an approach to estimate Londoners' **access to public open space** based on walking distances along roads and paths. Areas within acceptable distances to Public Open Space are calculated using network analysis, with areas outside of these calculated spaces classified as areas of deficiency. As of March 2025, 38% of residential addresses in London fall within an Area of Deficiency in access to Public Open Space (AODPOS).[101] While there are no comparable statistics available due to varying definitions of access across England, the Department for Environment, Food & Rural Affairs (DEFRA) is developing official statistics on access to green space which will allow comparisons in the future.[102]

Domestic gardens make up 24% of London's land area. Much of this is paved, decked, or covered by sheds or similar buildings and there is a growing trend for replacing vegetation with hard surfaces. Private gardens provide many people with daily contact with nature and form a pleasant component of residential areas. A single garden may provide habitat for a range of plants and wildlife and collectively they are an important resource for conserving species such as hedgehogs, amphibians and pollinating insects.

Despite the increase in garden land between 2002 and 2014, data from 2010[103] shows that between 1998-99 and 2006-08, the area of vegetated garden land declined by 12%, a loss of 3,000 ha, whereas the amount of hard surfacing and buildings (such as sheds) increased. The changes in garden cover are mainly due to many small changes to individual gardens by homeowners, rather than large scale changes or housing development on garden land. However, both can lead to significant loss of garden land at a local level.

The GLA's **Green Cover** Map provides estimates of how much of London is green, specifically tree canopy cover and green cover. In 2024, London's tree canopy cover is estimated at 19.6% (with a ±0.3% margin of error) and its green cover at 51.7% (±1.11%). Previously, London's canopy cover was estimated at 21.06% (± 0.2%) and green cover estimated at 47.6% to 50.7%. While the latest data would indicate a decrease in tree canopy cover, there is no statistically significant change in canopy cover across London within the timeframe (2016 to 2022).[104] Approximately one-quarter of urban

wards in the UK have canopy cover exceeding 20%, a benchmark often suggested as a minimum target. GLA's analysis indicates that London's overall canopy cover is just below this threshold.

London's **urban forest** comprises areas of extensive woodland, wooded landscapes in parks and open spaces, trees in residential gardens and street trees that covers about 20% of London.[105] Together, these eight million trees[106] and woodlands form London's urban forest. This includes ancient woodland, community orchards, street trees and trees in parks. London's woodlands are mostly broadleaved and cover eight per cent of London's land area (13,300 ha), with 20% of this defined as ancient woodland. London's trees remove an estimated 2,000 tonnes of pollution from the air each year. This is equivalent to 13% of particulates (PM10) and 14% of Nitrogen Dioxide (NO2) emitted by motor transport.[107] London's urban forest provides at least £133m of value each year.[108]

Tree cover is not distributed evenly across London and the percentage canopy cover ranges from 3% at its lowest (in Barking and Dagenham) to 45% in Chislehurst, Bromley.[109] Tree equity is a measure of how easy it is for people to access trees. Whilst much of London has a high tree equity score, there are several neighbourhoods with lower scores, with the lowest in Brent.[110]

There is a strong body of evidence that shows that **being in contact with the natural environment** is vital for our mental wellbeing and physical health at all ages. People with access to good quality green space have better mental and physical health and every 10% increase in green space is associated with a reduction in disease equivalent to a gain of 5 years of life.

Feeling part of nature is a proxy measure for whether people are enjoying green and wild spaces across the capital, as it relates not only to access but also to people's personal experience with nature.[111] The People and Nature Survey is a national survey by Natural England that collects information on adults' and children's experiences and views about the natural environment, and its contribution to health and wellbeing. There is slight increase in the percentage of adult Londoners who feel part of nature, rising from 59.3% in 2020/21 to 62.8% in 2024/25.[112] By comparison, the percentage across England also shows a slight upward trend, reaching 63.5% in 2024/25.[113]

Future pressures on the natural environment are likely to worsen the issues listed above. A continued climate emergency will exacerbate changes to weather patterns (hotter and drier summers, warmer and wetter winters, and more extreme weather events). In turn, this will worsen the effects of climate change, including flooding, drought, changes in species composition, and the spread of pests, diseases, and invasive species. Similarly, London's population is growing, further exacerbating human disturbance, land use change (particularly increased development), and water abstraction, required to serve new development.

Climate Change

CO2 emissions

Greenhouse gas emissions (GHG) in London are reposted annually in the London Energy and Greenhouse Gas Inventory (LEGGI). The latest report was published in November 2024 and is based on data for 2022, the most recent year for which information is available. In 2022, London's CO2 emissions were 28.40 million tonnes (Megatons of carbon dioxide equivalent, $MtCO_2e$). Emissions from domestic, industrial and commercial buildings were responsible for 66% of the total, transport emissions for 27%, with other sources responsible for the remainder.

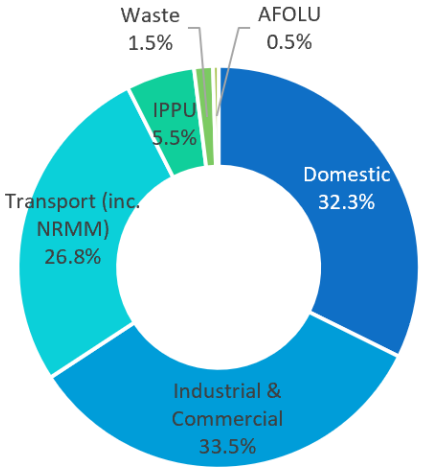


Figure 48 Greenhouse gas emissions by sector, 2022 (Source: LEGGI)

Over the short-term, emissions went down from 31.94 MtCO $_2$e in 2019 (pre-pandemic), to 28.37MtCO $_2$e in 2021 and then in 2022 there was a very small 'pandemic rebound effect' as emissions increased to 28.40 MtCO $_2$e.[114] Over the longer term, emissions are 37% lower than 1990 levels and 44% below the peak of emissions in 2000. Despite a 30% increase in population since 1990 and significant economic growth over that period, London's per capita emissions have reduced by 52%, from 6.7 tCO $_2$e in 1990 to 3.2 tCO $_2$e in 2022. Compared to the rest of the UK, London has the lowest per capita emissions of any region.

Houses and workplace buildings account for 36% and 42% of the city's CO2 emissions respectively. Improving the **energy efficiency** of the housing stock is vital for achieving London's net zero ambitions because it reduces the overall demand for energy, which in turn lowers the amount of GHG emissions associated with energy production and consumption. An Energy Performance Certificate (EPC) indicates how energy efficient a building is, from A (most efficient) to G (least efficient). EPCs are required when properties are built, sold or let, and all new EPCs are added to the Energy Performance of Buildings Register.

Across England, the share of domestic EPCs added to the register with a rating of A-C has trended upwards over the last decade. In London, the share has increased from 36 percent in Q4 2014 to 64 percent in Q1 2025, consistently remaining above the national trend over this period.[115]Tower Hamlets in London stands out as the local authority with the highest percentage of housing in band C or above, with 82% of dwellings with a valid EPC registering a score of 69 or above.[116] However, a quarter of London homes and 37 percent of non-domestic buildings in the city have been certified E, G, and F, the worst energy ratings.

The amount of electricity generated in London via **renewable sources** including wind, solar photovoltaic, landfill and sewage gas or other biomasses and waste is increasing. Since 2014, renewable electricity generation in London increased by over 50%. It peaked at 1,393 GWh in 2020, while decreasing slightly in 2022 and in 2023, to 1,172 GWh mainly due to a decrease in generation from biomass and waste. Total electricity consumption in London in 2022 was almost 34,000 GWh (the latest data available from LEGGI) – meaning that local renewable electricity generation accounted for only around 3% of London's electricity consumption.

London continues to have one of the lowest solar installation rates in the UK, primarily because of factors like the high number of flats, rented properties, and complex urban planning challenges. These

issues, combined with higher installation costs in the capital, lead to a lower percentage of households with solar panels compared to other UK regions.

Heat Risk

The change in global climate is causing an increase in frequency, duration, and magnitude of extreme heat events, including heatwaves. High temperatures in cities affect infrastructure, worker productivity and have significant effects on health and wellbeing, particularly for vulnerable populations.[117] In July 2022, London hit 40°C. During that heatwave, the LFB received 2,496 calls, including 740 relating to wildfires, and operations were cancelled at Guy's and St Thomas' hospitals as IT servers broke down in record heat.[118] Future increases in electricity demand for cooling, as a result of rising temperatures, could affect London's energy supply. For example, extremely high demands on London's power supply network due to high cooling demand could lead to subsequent 'brown outs' meaning a reduction in or restriction on the availability of electrical power in a particular area.

Data from the UK Health Security Agency (UKHSA) show that in 2024, London experienced four heat episodes, resulting in an estimated 144 excess heat associated deaths. Since 2016, the number of excess deaths in London varied year on year but remained stable compared to the trend for England. The highest peak in London occurred in 2020 at 488, while England's highest number was recorded in 2022 at 2,985. These statistics were calculated using death registration data, comparing daily deaths during heat episodes with baseline daily deaths.

Higher average temperature are likely to intensify the Urban Heat Island (UHI) effect which can result in the centre of London being up to 10°C warmer than its surroundings. Heat islands can develop in fairly large areas within a city, or in smaller 'pockets' around individual buildings or along streets. London has a fairly pronounced UHI due to its size and density. The variation of temperature can depend upon the nature of the land cover with parks and lakes cooler than adjacent areas covered by buildings which absorb and trap heat.

High temperatures also cause damage to trees which are critical to city resilience and provide cooling shade. Analysis carried out for Friends of the Earth, found that inner city areas with fewer trees and green spaces were up to five degrees hotter in July 2022 than those with more tree cover and plant life.[119] **Wildfires** are a growing threat at London's rural-urban interface, as shown by the fires at Wanstead Flats in 2018 and Wennington in July 2022. These events highlight the importance of informed land management where planning boundaries meet the natural environment. Wildfires pose a significant risk to nature, and England does not yet have a national strategy or action plan for managing wildfires.

Drought and water supply

Ground water depletion combined with hotter and drier summers has the potential to significantly impact public water supply, especially in the southeast of England.[120] London is already an area of serious water stress.[121] In 2022, London saw temperatures exceed 40 degrees, a 50% increase in water consumption and our reservoirs were at their lowest for 30 years.[122] Without action, there will be a 5 billion litre per day gap between the demand and supply of water in England by 2050.

During prolonged dry periods, water companies put in place different measures to protect water supply. There are four levels of drought plan measures used in England; level 3 and above are defined as emergency measures to protect supply and involve non-essential water use bans. Measures must be timely and proportionate to the drought risk to avoid the need for even more severe level 4 restrictions.

The last time emergency drought measures were reported in London was in 2022. For the year 2024/25, Thames Water reported no days in emergency measures (drought level 3 and above), indicating no severe drought events that triggered this level of response.[123] This aligns with the

previous year's reporting (2023/24), which also recorded no emergency measures. While the absence of drought emergency days in recent years is positive, it should be interpreted with caution. The Environment Agency's assessment of water companies across England in 2023/2024 found that while there were operational drought-related supply issues during this time, water companies did not have enough water available in some areas to meet demands if there had been a drought.[124]

Flood risk

There are many sources of flooding in London, including tidal, fluvial, surface water, ground water, sewer and reservoir. Due to climate change – which would bring about wetter winters and heavier rains that can raise the sea level – both the risk and intensity of major flash floods have increased. The updated review of strategies and flood risk modelling reveal that the main flooding issues in London are surface water flooding (flash floods) resulting from heavy rain overwhelming outdated drainage and impermeable surfaces from new development, tidal flooding from storm surges in the Thames, and river/fluvial flooding from high river flows. These are exacerbated by the city's extensive hard surfaces, Victorian-era sewers not designed for modern rainfall intensity, and the increased frequency of extreme weather events due to climate change.

Nine percent of London is at high risk (1 in 30-year event) of tidal, river or surface water flooding and 13 percent at medium risk (1 in 100-year event).[125] This represents a notable increase from the results of RFRA in 2018 of 6 percent and 11 percent respectively. With the climate change scenario added to the spatial analysis, the risk of flooding significantly increases to 16 percent of London being at high risk (1 in 30-year event) of tidal, river or surface water flooding and 23% at medium risk (1 in 100-year event).[126]

London's Surface Water Strategy published in May 2025 estimates that there are almost 320,000 properties at high risk of flooding in London. Around 18 properties in South London and 121 properties in North London were reported to have flooded in 2023/24[127]. Most of these incidents occurred in September 2024, a period during which London faced surface water flooding resulting from heavy rainfall.[128] These figures are indicative and based only on reported cases to the Environment Agency, meaning the actual number of properties flooded is likely to be higher due to unreported incidents and incomplete data.

Flooding poses a lethal risk to Londoners. In July 2021, London was hit by two extreme rainstorms. Some parts of the city received more than twice the average July rainfall in two hours, causing major disruption and over 2,000 properties flooded with stormwater and sewage. More than 30 tube stations were affected; hospital wards were evacuated. Of all properties at risk of flooding (coastal, fluvial, groundwater and surface water) across England, 60% are at risk of surface water flooding.[129]

The types of strategic infrastructure with the highest percentages in terms of assets in high flood risk areas are bus depots, railway stations, TFL underground stations, hospitals and schools. The majority of these critical assets are located in areas at high risk from surface flooding. All other infrastructure assets have lower proportions for high flood risk. More information can be found in the updated London Regional Flood Risk Assessment Report produced by GLA.

London's existing **river defences** currently protect homes, critical infrastructure, and businesses. Sea level in the Thames Estuary is now expected to rise by around 1.15 metres by the end of this century.[130] The deadline for upgrading defences downstream of the Thames Barrier is 2040.[131] While the current Barrier is expected to last until 2070, to prolong the Barrier's lifespan until a replacement is in place, the Environment Agency will have to stop using the Thames Barrier to protect west London communities from fluvial floods by 2035.

While London is well protected against tidal flooding, it has a much lower level of protection in place against **surface water flooding**. The latest National Flood Risk Assessment (NaFRA2)[132] update shows that nearly a third of a million residential properties in London (319,800) are at high risk from surface water flooding,[133] including at least 45,000 basements.[134] This total represents almost 30 percent of all such at-risk properties in the country and is more than eleven times the number of London properties that are at high risk from river and sea flooding. In addition, around 40 percent of London's 300,000 commercial properties are estimated to be at risk of surface water flooding.[135]

This indicates a significant increase in the numbers at high risk from surface water from (200,000 residential properties in previous modelling). Recent analysis indicates that nearly half (14,780) of London's 33,200 basements in commercial use are at risk of flooding from heavy rain.[136] This comes after Zurich's data scientists pinpointed every commercial or mixed-use property in the city and mapped them against areas of flooding from heavy rain. Of these, 5,692 basements face a "high" or "extreme" flood risk, with the greatest number of buildings in Westminster.

Groundwater flooding in London is also a significant risk, particularly in areas built on gravel beds over London Clay, such as Hammersmith, Fulham, Southwark, and Wandsworth. In parts of Croydon and South London which has historically experienced groundwater flooding, the Environment Agency provide a groundwater alert or warning service.

Research shows that surface water and sewer flooding will disproportionately impact those most vulnerable.[137] They are projected to be the most likely to experience flooding, may need more support to evacuate during a flood, and have access to fewer resources to recover quickly from any damage and disruption. These vulnerable individuals and communities were shown to be relatively more likely to live in places where flood risk is highest, and therefore where the potential costs and impacts of flooding may be greatest.

In many parts of the capital, more than 75% of vulnerable people are already at risk of surface water flooding.[138] This will mean they are more likely to experience both the direct damage of flooding and, the indirect impacts of stress, higher insurance premiums, and disruption to public services for which they may have greater need. Many of these vulnerabilities relate to protected characteristics (such as disability and age) and income and housing status affected by structural inequalities that arise from discrimination and other unequal access to opportunity/division of responsibility.

Energy use

Overall, London, alongside Manchester and Birmingham, have the highest electricity consumption in the UK.[139] London consumed an estimated 121,101 GWh of energy in 2022, a 10 percent reduction on 2018 levels of energy use despite a population increase over this period. 39 percent of the 2022 energy use was consumed in London's homes, 37 percent from London's commercial and industrial sector and 24 percent in the transport sector. Gas consumption made up 45 percent of the total energy consumed in London in 2022, and electricity consumption accounted for 27 percent.

London's energy consumption has a long-term declining trend, though it has been less steep than in other UK regions. Recent years show mixed trends, with domestic consumption dropping significantly due to warm weather but transport consumption rising.

- **Domestic consumption:** Domestic energy use saw a sharp fall in 2022 compared to the previous year, largely due to record warm temperatures.
- **Transport consumption:** Transport energy use is rising from 2020, driven by a rise in air travel and light goods vehicle consumption.

- **Other sectors:** Consumption in the industrial sector decreased during the pandemic but overall final energy consumption rose due to transport growth.

Gas usage in the domestic sector increased during the pandemic, followed by a steady decrease since 2021, and this trend is expected to continue despite projected population growth. Gas contributes to 30 percent of London's total emissions mostly to heat buildings,[140] and without decarbonising gas networks and switching to greener gases[141] such as hydrogen, London is unlikely to achieve net-zero emissions. Electricity usage has stabilised despite the increase in population, largely due to increased efficiency of appliances. However, it is expected that demand for electricity to rise as population continues to grow and heating and transportation are increasingly electrified, in favour of electricity from a decarbonised grid.

Capacity of the **energy supply** is also a concern. Significant new investment is already urgently needed in electricity substations capacity and distribution to keep up with demand and to accommodate the step change in the rate of house delivery that is required.[142] One in five substations has less than 7 per cent spare capacity. Most of London's heat and hot water needs are supplied by the gas grid with boilers in each building. London's electricity comes from the electricity grid. Power in this grid is generated in large powers stations outside of London.

London's energy supply from **decentralized systems** includes solar panels, local heat networks, and combined heat and power (CHP) plants. The city has set targets to increase the share of energy from these local, low-carbon sources, with a goal of generating 15 percent from local, renewable sources by 2030. Existing energy resources are not being utilised as effectively as they could by, for example existing energy sources such as waste heat from industrial processes could be used to heat buildings.

The UK has set an ambitious commitment for up to 10GW of low carbon hydrogen production capacity by 2030. [143]The 'Accelerated Green' pathway has been selected as the preferred route to reaching net zero in London by the Mayor of London, part of which estimates hydrogen demand in industrial processes will stand at approximately 0.3TWh per year by 2030. The source for the hydrogen projected to be used by these businesses is a crucial factor in any decarbonisation plan. There will be an accompanying massive scaling up of renewables needed to ensure London's businesses can access sufficient green hydrogen, otherwise it will be obtained from fossil fuel sources.

Fuel poverty continues to be an issue in London, with 9.4 percent or 350,000 households meeting the Government's 'low income high cost' definition of fuel poverty (compared to 11 percent across England). However, as the definition favours larger homes, there may be many households in smaller properties who also struggle to pay their fuel bills despite not meeting the definition.

London has one of the lowest rate of fuel poverty in England due to a combination of the highest median A-C fuel poverty energy efficiency ratings (FPEER) at 71, the smallest typical home sizes, with median floor area of 78m2, the lowest median equivalised fuel costs (£1,978), and median equivalised incomes higher than the national median of £28,816.[144] In 2024, London had the lowest average fuel poverty gap of £298 which could be explained by London having the lowest median fuel costs (£2,200 and £2,100 respectively) and the highest median energy efficiency rating (both 71).[145]

Changing fuel prices and energy efficiency, as well as increases or decreases in relative income and housing costs can impact on these figures. Using the previous measure of low income high costs, London also tended to have a lower level of fuel poverty than England. Throughout the last decade there is a clear downward trend overall, as energy efficiency has improved, both in London and nationally. Increased uncertainty of the data during the early part of the pandemic means that this should be treated with caution.[146]

One way of helping to tackle energy affordability (including fuel poverty) is to improve the efficiency of London's buildings and transport. Retrofitting is a huge challenge in London. Over 80 per cent of the buildings standing today will still be occupied in 2050.[147] There are around 3.4 million homes in London, the vast majority of which will need to be retrofitted with building fabric measures (such as cavity wall insulation) and potentially on site renewable energy generation to reduce the energy demand, if GHG reduction targets are to be met.

Geology, Soils and Land Use

London's biodiversity is underpinned and influenced by its geodiversity (rocks, minerals, landform and soil diversity). Greater London lies within the London basin, a large geological 'dish' that dominates the geology of the Home Counties. It is bounded to the south by the chalk of the North Downs and to the north by the chalk outcrop of the Chiltern Hills.

London's main bedrocks are chalk and London Clay, with much of the surface geology made up of sands and gravels. The London Clay Formation produces heavy acidic soils, often prone to waterlogging in winter months and to shrinking and cracking in summer. The soils formed from this surface geology produce a complex mosaic of different habitats with distinct plants and wildlife. The Thames and its tributaries form a broad, shallow valley. The main tributaries of the Thames within London are the Hogsmill, Beverley Brook, Wandle, Ravensbourne, Roding, Ingrebourne, Beam, Lea, Brent, Crane, and Colne.

London has a range of distinctive natural landscapes shaped by geological processes, such as undulating chalk downlands in south London and the river terraces in the north. London's geological sites are protected through designations including Sites of Special Scientific Interest (SSSIs), Regionally Important Geological Sites (RIGS) or Locally Important Geological Sites (LIGs). There are seven geological SSSIs in London, four of which are in favourable condition and three in unfavourable.

The **Agricultural Land** Classification (ALC) system classifies land into five grades. The best and most versatile agricultural land is defined as Grades 1,2 and 3a of the ALC. A combination of climate, site and soil characteristics and their unique interaction determines the limitation and grade of the land. These affect the:

- range of crops that can be grown
- yield of crop
- consistency of yield
- cost of producing the crop

When considering development proposals that affect agricultural land, the London Plan should aim to protect the best and most versatile (BMV) agricultural land and soils in England from significant, inappropriate or unsustainable development proposals. At the strategic scale, Natural England produces mapping that predicate the likelihood of BMV agricultural land for London and the South East.[148] This shows that land with high and moderate likelihood of BMV is concentrated in the outskirts of London.

The underlying geology and the man-made substrates of former buildings and demolition rubble that overlays much of London's underlying geology can have a profound effect on matters such as sub-surface hydrology and the types of landscapes that can be created, managed and maintained in the urban environment. Some soils in London have high levels of **contamination** from substances that are legacy of former industry, such as old gas works, landfills or chemical plants. This is a particular issue for some of London's larger brownfield sites which require redevelopment. Risk of soil degradation is also increasing, particularly during the construction of new developments and infrastructure.

Burial Space

The availability or capacity of burial space across London varies considerably, with supply and demand often dependent on location and on demography. This is influenced by both the size of an area's ageing population, and the proportion of faith or ethnic groups – including Muslim and Jewish communities, whose beliefs preclude cremation and typically favour the interment of a single body in each grave.

The 2011 burial audit that supports the London Plan burial policy is based on figures collected in 1995 and 2010. It found that eight boroughs in London contained no significant burial space, and a further fifteen were reliant on created graves or would be unable to meet projected demand for burial provision over the next twenty years. It found that the amount of land held in reserve by London boroughs was sufficient to accommodate an estimated minimum of 21 percent of demand for burial space over the next twenty years. This suggests that the majority of boroughs in London lack the capacity to supply sufficient burial to meet the level of demand suggested by mortality projection estimated in 2011 over a twenty-year period. Mortalities resulting from the COVID-19 pandemic have accelerated the decline in burial space capacity in London.

Previously developed land

London saw a large expansion in its population and geographic area up until the Second World War. Urban land was not in restricted supply because new transport – commuter rail, trams, London's underground and then arterial roads – opened up land as it was needed. The expansion of London meant it absorbed towns such as Croydon, Kingston, Harrow and Romford within its boundary. The introduction of the 1947 Town and Country Planning Act, which changed development rights and introduced urban containment policies such as greenbelts saw a change in the way London developed.

Economic development within the city has developed a distinct geography, as described in the 'Key Locations' sub-section of the Economic Potential and Employment section. Current London Plan policies focus on higher density residential growth in town centres as well-served locations for housing growth.

Opportunity Areas (OAs) refer to long term regeneration and renewal areas. They are the city's major reservoirs of brownfield land also have significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport. OAs are complex and heterogenous, with each OA presenting a different opportunity/challenge and being at a different stage in the development cycle. Established in 2004, OAs make up a significant contribution to housing delivery, with over 39 per cent of completions over the 2023/24 monitoring period (13,301 homes out of a total for the whole of London of 33,389 homes). Many of London's OAs are either substantially or partially within Flood Zones 2 and 3.

Due to the scale of growth expected and the limited supply of land, there is an inherent tension between the delivery of housing versus that of other land uses, in particular employment, and competition between them can impact on the spatial and economic structure of the city How London will accommodate this growth is fundamental to the preparation of the new London Plan. London has been delivering between about 30,000 and 45,000 homes a year for the last decade, rates of housing delivery not seen since the 1970s.

The current London Plan is based on delivering housing within London's existing urban extent, with a focus on optimising the use of land including through increased densities. The new national requirements for the number of homes to be delivered and the changed approach to green belt will require the next London Plan to review and release green belt to meet housing and other development needs where those needs cannot be met in other ways, such as redevelopment within London's existing built area.

Materials and Waste

As London's population grows, **waste generation** remains a significant challenge, with London currently producing around 6.8 million tonnes of municipal waste annually,[149] and continued challenges both reducing overall waste generation and meeting recycling targets. While progress has been made in adopting circular economy principles, promoting recycling, and encouraging reuse initiatives since the last London Plan, London's 'household waste' recycling rate has remained relatively static in recent years, hovering around 33%[150], well below the Mayor's municipal recycling target of 65% by 2030.

In 2022/23 London sent 5,000 tonnes of Local Authority Collected Waste to Landfill, representing 0.1 percent of London's total waste, compared to an England average of 7.2 percent[151]. Compared to other regions in England, London sent the largest proportion of its total local authority collected waste to incineration in 2022/23 at 65.2 percent, of which 64.8 percent included energy recovery. plants do not sort through the waste before incineration, resulting in large amounts of recyclable materials being unnecessarily incinerated. For example, since not all boroughs of the city offer separate food waste collection, food waste, which could be safely sent through environmentally friendly processes, is instead burnt.[152]

The share of household waste collected by local authorities that is sent for recycling rate in London has stayed the same for the last three years, at 32.7%. Since 2014/15, London's household waste recycling rate has remained consistently below England's. Nationally, recycling rates in England are slightly higher in 2023/24 than the previous year at 42.3% but remain lower than in 2019/20.[153] Tower Hamlets has the lowest recycling rate of 15.8%, while Bromley has the highest rate of 50.9%.[154]

A number of contributing factors have been identified for this performance including;

- London being a highly diverse and transient city which can make communicating recycling services difficult.
- There are 33 waste collection authorities each delivering their own set of services depending on specific circumstances. This can make things confusing particularly when residents move between boroughs.
- London is a rapidly growing city against a backdrop of limited suitable available space for new housing. Around half of the housing stock is high rise flatted accommodation with limited easily accessible storage space for recycling compared to separate households served by kerbside collection services.
- London has less garden space than other regions, producing less garden waste that could contribute to recycling performance.
- A continued focus on weight based recycling targets becoming harder to reach with light weighting of materials and less paper in the waste stream with an increasing transition from the paper to digital economy.

By 2026, London aims to send no biodegradable waste (including food waste) to landfills and by 2030, the city hopes to recycle 65% of its municipal waste. To achieve this, multiple steps have been taken.[155] Minimum recycling standards for waste authorities have been set, including a requirement for separate food waste collection. Multiple schemes have been implemented to reduce packaging waste such as water refill stations to reduce single-use plastic water bottles, working with stakeholders to reduce unnecessary packaging, and spreading awareness among Londoners on how they can reduce their own waste. According to ReLondon's 2024 report:[156]

- Around 2 million tonnes of packaging are consumed and disposed of every year in London – by residents, visitors and businesses – equivalent to almost 250kg per person.

- Only a small proportion of this gets recycled – 44% for household waste and 33% for commercial waste.
- While visitors account for 30% of consumer packaging use in London, they account for 55% of packaging thrown away in street bins as well as in hotels, restaurants and offices.

The Mayor is not a waste planning authority, a waste collection authority or a waste disposal authority. In London, these statutory responsibilities lie with boroughs, either individually or acting together jointly, and with statutory waste disposal authorities. However, the Mayor is able to exercise strategic oversight through ensuring that:

- borough waste strategies and contracts are in general conformity with his Mayor's Municipal Waste Management Strategy
- borough waste plans are in general conformity with the London Plan
- waste facilities generating energy from waste meet the Mayor's London Plan carbon intensity floor policy

The Mayor's powers to directly influence waste contracts are limited to the boroughs' contracts for LACW which should be in general conformity with the Mayor's Municipal Waste Strategy. Waste contracts do not respect administrative boundaries and waste flows across boundaries (some of London's waste is currently dealt with in Germany and the Netherlands). In practice, Mayoral intervention focusses on whether contracts support achievement of the Mayor's reduction, recycling and CO2 reduction targets – not regional self- sufficiency targets.

The London Waste Map[157] shows the location and capacity of licensed **waste management facilities** across London. London has approximately 368 permitted waste sites[158]: of which 42 percent fall into household, industrial and commercial waste; 52 percent Construction, Demolition and Excavation (Inert) waste; and 6 percent Hazardous waste types. In terms of the geographical distribution: a large proportion of waste sites are distributed across east London boroughs such as Barking & Dagenham, Newham and Havering; with significant number of sites also to be found in Bexley in the South, Enfield in the North and Hillingdon in the west of London. Waste sites are safeguarded under London Plan policy, however many are at risk due to increasing demand for other land uses in particular for new housing.

London's housing, building and infrastructure are built, maintained and improved with mineral products such as **aggregates** (crushed rock, sand and gravel, and recycled materials), asphalt, lime, cement and concrete, dimension stone and mortar. Construction in London could not take place without effective supply chains for these key materials and mineral products. Despite a substantial increase in the use of recycled aggregates, it is likely that the major proportion of future aggregate demand will be supplied from primary sources because there are limitations on the availability of material to be recycled into aggregates and technical limitations in their use.

London is highly reliant upon aggregate imports due to the low amount of potentially available resources and permitted reserves within the Greater London region. Only four boroughs in London have identified land-won sources of primary aggregates – Havering and Redbridge in East London, and Hillingdon and Hounslow in West London. As of 2018, only a small percentage of London's aggregate needs (3-4 per cent) were met from primary production sourced within London due to the very limited nature of this resource.[159] The largest proportion of sales for sand and gravel for London continues to be provided from marine sources with 3.4mt in 2023.

London has no crushed rock quarries and is therefore entirely reliant on the supply of crushed rock aggregate from either quarries in England and Wales or sources in Scotland and Europe. Deposits of sand and gravel are available within those four boroughs mentioned above. At 31 December 2023, the

reserves of sand and gravel in London are 5.27 million tonnes which equates to a landbank of 7.52 years, this is slightly over the minimum 7 year landbank required in the London Plan (at least 5mt). This is based on the 0.7mt per annum provision within the London Plan 2021.[160] Consequently, London is making a sufficient contribution towards the National supply of land won aggregates.

As a result of this reliance on imported primary aggregates, ensuring that the infrastructure required to support the movement of aggregates into and around the capital is maintained is essential for maintaining an adequate supply – namely, the **wharves and rail depots** used for this purpose. Transport by rail and water has enormous benefits in terms of reducing the distance material is moved by lorry and associated benefits in air quality, congestion and road safety.[161] Using rail enables large volumes of the 'aggregates' needed to make cement and other essential building materials to be brought close to urban construction sites, minimising the use of Heavy Goods Vehicles.

Approximately 40 percent of all aggregates used in London are delivered by rail.[162] The rail network in London also supports vital movements of containerised goods as a key link in supply chains serving consumers both in the South East and nationwide. Import and export movements of cars and automotive parts also rely on lines in London, a substantial proportion of the city's waste is removed by rail and Heathrow airport is supplied with a fifth of its aviation fuel by cross-London flows of freight trains.

It is estimated that there are approximately 50 sites that handle **construction, demolition, and excavation (CDE) waste**. London's recycled aggregates production is estimated from data collected by the Environment Agency's Waste Date Interrogator (WDI). The produced figure (three year average of 4.18 million tonnes from 2020 to 2022) relates to waste in London only, while the managed figure (three year average of 4.38 million tonnes from 2020 to 2022) includes waste that is handled within London and includes waste that has been transported into London to be processed. However, the data from the Environment Agency does not capture all CD&E processing activities. The tonnage of recycled aggregates reported in the WDI is likely to only represent a proportion of the recycled aggregates in circulation. These figures are only estimates and should be treated with caution.

The demand for sustainable and locally-sourced aggregates is expected to grow. The push for green building materials and the government's net-zero goals mean that recycled and low-impact aggregates will likely play a larger role in projects. Modular and prefabricated construction methods, which often require specific aggregates for offsite production, will further boost demand.

Noise and Vibration

Noise and vibration in London are significant urban challenges, primarily from traffic, construction, and the underground railway, which can impact building integrity and human well-being. However, data on noise levels in London is difficult to obtain. According to a 2022 study, 2,647,600 Londoners were exposed to traffic noise above the WHO guideline of 55dB, the second highest number in any major European study.[163] A level of 57dB represents the 'onset of significant community annoyance'. Hotspots for London noise pollution appear to be on the northern, eastern and western fringes of the capital, notably near Heathrow Airport and around the M25.[164]

Aviation noise also affects many people in London. A 2013 report from TfL noted that 766,100 people lived within the ≥55 Lden contour of Heathrow and at least another 17,800 people living within the ≥55 Lden contour of London City airport. This indicates that aviation noise is a significant environmental issue in London. The number of flights, particularly at night, can affect people's experience of uncomfortable levels of noise. Previous research by countryside charity CPRE suggested that parks in Sutton and Richmond are the capital's quietest, while Enfield, Westminster and Lambeth are the worst affected.[165]

The World Health Organization (WHO) has claimed that noise pollution is second only to air pollution in terms of environmental health threats in Europe – with around one in three people being negatively affected on the continent. The UK Government estimates that the 'social cost' of the problem totals somewhere between £7 billion and £10 billion every year.[166] Noise disturbance can be associated with health impacts such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in children. The adverse impacts of that stress are clearly documented, resulting in higher rates of cardiovascular disease and deteriorating mental health.

Water resources and quality

The Blue Ribbon Network is London's strategic network of water spaces and covers the River Thames, canals, tributary rivers, lakes, reservoirs and docks alongside smaller waterbodies. Every London borough contains some element of the network – 17 boroughs border the Thames and 15 contain canals. Many boroughs contain both rivers and canals.

The Environment Agency is responsible for water quality and resources – it is their responsibility to decide how much water can be taken from the environment for people and businesses to use, without damaging the environment or compromising existing lawful users and they must also control the volume and quality of discharges made to rivers. Water is supplied to customers in London by four water companies. Thames Water is the largest, the other three (Affinity Water, Essex & Suffolk Water, and Sutton & East Surrey Water) are regional suppliers. The majority (around 80 per cent) of London's water is drawn from rivers, principally the Thames to the west of London and the River Lee in North London. Most of the rest of London's supplies comes from abstracting groundwater.

The relatively dry nature of the South East, combined with the high population density, especially within London, means that water resources are under significant pressure. This pressure is exacerbated by London not only having one of the highest rates of water use in the country but also having some of the highest rates of leakage from the water supply distribution network. Measures to reduce demand, such as increased water efficiency, reduced leakage and increasing use of water meters are needed throughout London. This will help to manage the supply-demand balance over the short term. However, with a rapidly growing population and some restrictions on water abstraction for environmental reasons, it is also clear that there is a need for new additional water resources in order to maintain a secure water supply-demand balance.

The London catchment has 47 water bodies[167] (made up of rivers, canals and lakes). The Thames River Basin Management Plan (RBMP), 2022[168] measures water quality in these bodies, and of the 47, none are rated as 'very good'. Poor water quality has been attributed to the numerous wrongly corrected sewers and storms in outer London washing unwanted debris and litter. The ecological status of the 47 water bodies is:

- Very Good = 0
- Good = 3
- Moderate = 33
- Poor = 9
- Bad = 2

This is a poor reflection of London's waterbodies given that the EU Water Framework Directive aims to get all waterbodies to Good Status or at least to Good Potential. The updated Thames RBMP[169] provides a summary of the extent of Significant Water Management Issues (SWMIs), as follows:

- physical modifications
- pollution from wastewater
- pollution from rural areas
- changes to the natural flow and level of water
- pollution from towns, cities, and transport
- negative effects of non-native invasive species

Many of London's **rivers** are polluted. Only one of London's 41 river water bodies is classed as 'good' – three are 'bad', five are 'poor' and the rest are 'moderate' under the EU Water Framework Directive[170]. This means that our rivers are much less healthy than they should be, and it means that key species like eels and barbels (a freshwater fish) struggle to survive in London's rivers. The London River Health Map presents information collected by various organisations to show how healthy local rivers may be, and includes incidences of sewer overflows in the last 48 hours by location, the location of monitoring stations used to monitor water quality.[171]

The reasons for poor water quality are many and varied. Industrial pollution is quite rare, however the treated effluent from sewage treatment works makes up a significant part of the base flows for some rivers. A significant concern is the numerous wrongly corrected sewers that allow untreated wastewater to discharge into rivers.

Equally concerning is the impact of storms over the outer London area. This has the effect of washing the urban area, the roofs, streets, footpaths etc. of any dust, debris and litter that has accumulated. This can include significant amounts of hydrocarbons that have dripped or spilt from vehicles onto roads, together with bits of metal and tyre rubber. Any organic matter such as dog faeces will get washed into the rivers, along with other litter than has been left in the open environment.

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