LONDONASSEMBLY

January 2026

Environment Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation on London's Progress on Environmental Priorities.

Calls for Evidence are open to anyone to respond to. In November 2025, the Committee published a number of questions related to its Progress on priorities: London's Environmental temperature check investigation, which can be found on page 3.

The Call for Evidence was open from 15 December 2025 to 11 February 2026. The deadline to inform the Committee's February roundtable discussions was Wednesday 21st January 2026, while the deadline to inform the Committee's 3 March meeting with the Deputy Mayor was Wednesday 11 February 2026.

Contents

LONDONASSEMBLY

January 2026

LONDONASSEMBLY

January 2026

Areas for Evidence Requested by the Committee

1. Examples of progress, including short case studies where relevant, that London is making on its environmental priorities

2. Barriers to progress, and views on what further action is needed from the Mayor and other stakeholders

3. Lessons learned from Londoners and London's environmental groups working to improve London's environment over the past decade

4. Topics or issues which have been overlooked, which the Environment Committee should scrutinise in greater detail

Submission to the London Assembly Environment Committee

Call for Evidence: London's Environment – Progress on Priorities (December 2025)

Submitted by:
Leanne Werner
Founder & Director, Wilder CIC
London

I am an environmental practitioner, researcher, and social enterprise director based in London. I am the founder and director of Wilder CIC, an environmental social enterprise delivering community-led urban greening, depaving and rewilding projects in some of London's most densely built neighbourhoods.

My work spans delivery, policy, research, and public engagement. I have led major greening and biodiversity projects across London, including the Wilder Mile in Southwark, biodiversity enhancement across multiple King's College London campuses, and greening strategies with Tate, including the creation of a riverside wildflower meadow at Tate Modern. I work closely with Southwark Council biodiversity officers, the Greater London Authority, housing estates, cultural institution and community groups.

I previously served as a Southwark councillor, where I chaired the Climate Emergency Scrutiny Commission, and I currently serve as a trustee of Trees for Bermondsey. I am also a co-author of a peer-reviewed paper in *Remote Sensing Applications: Society and Environment* (Elsevier) on identifying plantable urban rooftops across Central London.

Examples of progress on London's environmental priorities

There has been meaningful progress in London over the past decade in embedding biodiversity and greening into policy, planning, and public discourse.

At a strategic level, the London Environment Strategy, Urban Greening Factor (UGF), and Biodiversity Net Gain (BNG) have created clearer expectations that nature recovery must be part of development and regeneration. These tools have helped legitimise green roofs, depaving, urban meadows, and small-scale interventions as integral infrastructure rather than "nice to have" additions.

At a local and community scale, I have seen increasing momentum for neighbourhood-led greening. Through Wilder CIC, we have worked with residents, schools, estates, universities, and cultural institutions to deliver linked interventions that cumulatively improve biodiversity, reduce hard surfacing, and reconnect people with everyday nature. The Wilder Mile in Southwark demonstrates how coordinated action across a one-square-mile area can stitch together streets, courtyards, rooftops, and public spaces into functioning ecological networks.

There has also been progress in cross-sector collaboration. Cultural institutions such as Tate are increasingly engaging with biodiversity not just as landscaping, but as part of their civic role. Universities, including King's College London, are beginning to treat their estates as living laboratories for biodiversity enhancement and climate resilience.

Finally, public understanding of the links between nature, health, and wellbeing has grown significantly. Community appetite for wildlife-friendly spaces is strong, and residents are increasingly willing to take part in stewardship where given appropriate support.

Barriers to further progress

Despite this progress, several barriers continue to limit impact and pace.

Maintenance and long-term stewardship remain major challenges. While funding is often available for capital works, ongoing care is frequently under-resourced. Community groups are asked to shoulder responsibility without adequate funding, training, or institutional backing, which can lead to burnout or project failure.

Fragmentation of responsibility also slows progress. Biodiversity, highways, housing, estates, public realm, and climate adaptation are often managed separately, even though ecological outcomes depend on coordination between them. This can result in missed opportunities, for example where new planting is undermined by inappropriate mowing regimes, lighting, or heat stress.

Equity remains uneven. Neighbourhoods with the least green space and highest exposure to heat and pollution often face the greatest barriers to delivery, including limited capacity, complex ownership, and constrained budgets. Without targeted support, greening risks reinforcing existing inequalities.

Finally, **measurement and feedback** remain limited. While policy tools focus on inputs (such as green area or habitat units), there is less emphasis on how spaces perform over time, particularly in relation to climate stress, biodiversity persistence, and lived experience.

Overlooked issue: Watering, heat and long-term resilience

As London experiences hotter, drier summers, the success of urban greening will increasingly depend not just on what we plant, but on how landscapes are supported through prolonged heat stress. While drought-resilient species are essential, they are not sufficient on their own. Without more robust, adaptive watering strategies, newly planted trees, meadows, green roofs and estate landscapes are vulnerable to failure, undermining both biodiversity goals and public investment.

In practice, many community-led and publicly funded greening projects struggle during heatwaves due to unclear responsibility for watering, lack of access to water, or insufficient design for water retention. This is particularly acute on housing estates, streets, and roofs, where soil volumes are limited and heat exposure is high.

Through my recent RHS research and study in Australia, where extreme heat and water scarcity already shape urban nature policy, I have seen how cities plan watering as part of climate infrastructure rather than as an afterthought. This includes rainwater harvesting, passive irrigation, blue-green infrastructure, smart triggers linked to heat and soil conditions, and clear operational responsibility during extreme weather.

London would benefit from a more strategic approach that integrates water management into urban greening policy, funding criteria, and design guidance. Treating water as a core component of nature-based solutions would increase survival rates, protect biodiversity gains, and improve resilience as climate impacts intensify.

Lessons learned from delivery

From over a decade of practical delivery, several lessons stand out:

- Small, connected interventions can deliver significant cumulative impact when coordinated at neighbourhood scale.

- Community stewardship works best when supported by institutions, not substituted for them.
- Greening succeeds when it is embedded into everyday systems - estates management, highways, lighting, maintenance - rather than treated as a one-off project.
- Lived experience matters: residents' perceptions of sound, shade, safety, and wellbeing influence whether spaces are valued and cared for.

6. Recommendations for the Mayor and partners

1. **Integrate watering and heat resilience into greening policy and funding**
   Require major greening schemes to demonstrate how planting will be supported during extreme heat, including water sources, maintenance responsibility, and adaptive management.
2. **Strengthen long-term stewardship support**
   Pair capital funding with resourced maintenance plans, training, and long-term partnerships, particularly for community-led and estate-based projects.
3. **Target support to high-need neighbourhoods**
   Prioritise funding, officer support, and flexible delivery models in areas with the greatest nature deficit, heat exposure, and health inequality.

London has made real progress in recognising the importance of biodiversity, green infrastructure, and climate resilience. The next phase must focus on durability: ensuring that what we plant survives, adapts, and continues to deliver benefits as the climate changes. With clearer integration of water, maintenance, and equity into greening policy, London can move from ambition to lasting ecological recovery.

Friends of Hatton Fields

To whom it may concern

In response to the above call for evidence, I would appreciate you looking into the position of the Mayor regarding Hounslow Borough's Local Plan review and its plan to develop Greenbelt on Hatton Fields site 57.

HF is good quality green belt serving green belt purposes. It is a large 100 acre site and approx half of it is proposed to be developed into industrial use. Friends of Hatton Fields is objecting for several reasons including threat to air quality (2 major schools nearby as well as other nearby publicly used sites and residential areas), increased urban heat effects, increased noise and flood/surface water effects, not to mention deterioration of water quality in Duke of Northumberland River.

We do not feel the Mayor has properly defended this green space in his recent statement of common ground. HF full objection and said statement of common ground is all available on the council review website:

https://www.hounslow.gov.uk/local-plan/local-plan-review

In addition we ask the Mayor to learn from Wigan's huge mistakes in a recent industrial use development near local residential housing - here is a video which we feel says it all!

https://www.instagram.com/reel/DOa0xHgCK4B/?igsh=MTN5a3hsNmZ5eW5zNA==
We hope you can assist.

Regards
Clare Searle
Chair
Friends of Hatton Fields

Rin Roche

The London Assembly is committed to hearing from a range of voices which reflect the rich diversity of the city.
The Committee is especially keen to receive:
1. Examples of progress, including short case studies where relevant, that London is making on its environmental priorities;

Hounslow, as a leading example

My local authority, Hounslow, thankfully some councillors and last leader, Steve Curran RIP, are taking seriously the need to increase greenery
22 more parks now have green flag status, making it, 33, and 5,000 more trees planted across the borough, one for every new born in borough
First 64 zero carbon social homes built
22 million low carbonising investment in corporate buildings with funding from carbon trust

I think MoL should showcase Hounslow as an example of how councils can improve borough biodiversity/greening/decarbonising, they have done masses tbh too much to list, and won London Council of the year 2023 or 2024 because of their community and biodiversity work, by celebrating this at an all Councils event to kick off a big biodiversity annual awards.

Councils environment achievements should be celebrated and recognised somehow - an awards ceremony outside in a London park or something nature relative.

Hounslow made some good attempts at "greening" high street, there's issues for various reasons but it's SO EASY to pull up a paving stone and plant a climber over a shop - if you've been to the Med you'll know this.. Why is it so impossible for UK to embrace flowers!? So an iniative to encourage local shop owners to go greener .. It's really not hard - a pot a plant, a paver a plant...

Sir David Attenborough was born in Hounslow, Isleworth, 8th May 1926.. So I'm hoping the council will be recognising the great man's 100th year and this could be a great tie in to nature in the capital.

Also if you haven't already I'd recommend a visit to "The Onion Garden"
https://www.theoniongarden.org/
A wonderful example of how easy it is to create biodiverse rich environment in a jungle of concrete in central London

Barriers

Barriers to progress, and views on what further action is needed from the Mayor and other stakeholders;

The barriers are not clear and are many but
Possibly
+ Funding
+ Expertise
+ Appetite and enthusiasm from those to hold the power and authority to act
+ Other issues just more pressing

+ Ownership and permissions
+ Realism - such as owners of land uncertain about ongoing support the "who's going to look after it" question

Also residents can "block" as exampled by the anti LTN campaign

1. **Funding**

Funding - needs to be flexible, responsive, proactive, accessible funding for grassroots led actions - local authorities identify active residents who are already making changes but which many don't know how to write a grant or aren't eligible - local authority should be tasked to seek to find the budgets required by their local groups to deliver their biodiversity projects and then be awarded the funds by MoL to give to their local groups so councils umbrella the grant funds

monitoring using
Photo story
Budget
Environment improvement measure (use what3words for accurate location of area and size)

2. **Assessed as 1-3**

1 - improved area identified by adding more greenery
2 improved area by adding more greenery and pollinator friendly planting
3 improved area by adding more greenery, pollinator friendly plants and instigated an ongoing resident led action for this space

To measure the transition and be flexible in outcomes not relying so heavily on needing "numbers" .. So many individuals are doing great stuff as well as groups but they're completely overlooked as they're just "one" person but they've still made huge improvements so that should count as much as "bodies"

3. **Expertise Gap**

as a keen naturalist and being born in 1960's I find it absolutely soul destroying how our urban settings and wildlife have been constantly deprived of appropriate plants due to false claims of maintenance costs, lack of expertise or care by the landowners, extremely hard work to get change! Municipal planting has destroyed all pollinator friendly planting we used to have in London.

4. **Decision makers**

A big barrier is
Being heard by the right person, there needs to be a way to easily make contact with decision makers and a legal framework to ensure landowners have to increase biodiversity and be accessible to active residents, it shouldn't be a choice, it should be law, where's nature's rights? it's just some wishy washy non thing right now but
Councils
Housing associations
Developers
Churches
Own huge tracts of public land .. Their management of it for the benefit of nature IS TERRIBLE and completely adverse to nature
Use of poisons
Wrong plants

Removing plants we still call "weeds" seriously?? 2025 and we can't call a plant by its correct name or even recognise them - nettles are one of the main plants for so many pollinators Inc tortoiseshell & peacock butterflies
Mowing things to hell at the wrong time, the depressing list goes on and on.

Even TFL managed roundabouts can be a sorry excuse of planting with choices of either non pollinator plants or cactus type. Properly planted roundabouts could be thriving hubs for insects, it's not hard, there's no more maintenance or anything needed, it's purely down to poor plant choice with the "oh but the maintenance, hardiness costs" ...we could plant sedum, plant rosemary, plant lavender plant a million plants that are quite capable of self maintenance and super hardy that just get on with it and are pollinator friendly.

And the ongoing wide use of pesticides, herbicides and toxins that serve only to deplete nature, which ends up in our water, that's in such crisis that we no longer see familiar UK birds such as

Mistle thrush
Song thrush
Blackbirds

And now even Starlings are under threat, I mean really?? Is this the best we can do? I know we can do better, it's imperative if UK nature is to have any chance that we must urgently do better. Bluetits and other birds also being affected by pet hair used in nest lining that's toxic from flea treatment causing infertility...if we could think of as many ways to help nature as we seem to be able to do to destroy it the world would be nature rich.

As a child I recall there was always thousands of insects, loads of bees around lavender plants, the air was alive, most towns were proud of the planting now it's lifeless Begonias and Petunias as the idea of planting, no use for our pollinators, hundreds of big fat cabbage white caterpillars on the Ribes, crane fly's usually needing rescuing from spiders webs, large and gangly, now you're lucky to see one and they're literally half the size, it's weird that they've shrunk! Stag beetles, June bugs, lots of tortoishell butterfly, also now rare, also lots of butterflies in general, the classic bugs on the windscreen, it makes my blood run cold to think just how depleted UK insects are that I can literally drive from one end of the country to the other without a single bug... Well done Bayer, well done government, well done corporations, farmers and tidy widdy "gardeners" that have "tidied" and poisoned nature to death. Plastic in our blood, Glyphosate in our bees and kids wee.. what an amazing legacy modern man is leaving.. Anyway it's going to be over soon, we're not far off with January in London sitting at 11o in the day and December nights were 12o, and 22o this mid November.

All totally heartbreaking to have lived a life feeling helpless watching the wanton devastation of city nature, every year less and less and less..it's a crime and it's a failure of man to recognise themselves as committing a crime that is/was entirely avoidable.

Somebody like the excellent Paul Powelsand, who set up Lawyers for Nature, should be made Nature Ambassador for London, as a new role to work with mol, TFL, GLA, groups and residents as a pivotal role between them all... and given support to be able to advise borough councils on biodiversity improvements, somebody who is connected and directly plugged into nature with skill, knowledge, a love and passion for it. He's almost single handedly saving nature and improving the River Roding.

Here's a picture of a totally self maintaining pollinator friendly planted corner that was grass, rubbish and dog poo, on my estate that I created. Through sheer determination and getting the previous stakeholder housing association on side - it is also helping cool the house on that corner in our ever longer, hotter summers. Cost £2,500. Plants, materials and expert help - it doesn't have to cost the earth, but can help save it.

FUN
where's the fun? Everything feels so dragged down by corporate starkness, huge over developed areas and drudge.. Life used to be so much more fun and we need to rekindle that with colour, scent and life!
There needs to be a competitive fun London Councils biodiversity competition, with a different borough hosting the awards/recognition events each year, maybe working with Chelsea Flower show where councils have a stand to showcase their biodiversity achievements. An all Councils, as all of them have some green department, who compete to be cleaner, greener, biodiverse and more knowledgable about helping nature, including their expertise in recognising and naming plants and knowing what animals are in the borough, which are thriving which are struggling and why (including what we call weeds we really need to break this belief it's completely outdated and damaging) a fun table for best, worst, most improved to encourage those councils lagging behind to do better and push the ones already doing well to do better still and go further and to help understand whether leaders are blocking change or it's funding etc
3. Lessons learned from Londoners and London's environmental groups
working to improve London's environment over the past decade;

Lessons learned from Londoners and Environmental Groups

In my area Friends of Hatton Fields - campaigning to protect the last London Meadow from unneccesary development of warehousing when 2,000 stand vacant within 1.5 miles of Heathrow, also links to loss of green belt which is criminal this is being foisted on nature
Heston Action Group - taking action on litter in a big way and creating a horticulture allotment with Yurt and lots of socialising

Health means wealth - accessible horticulture and garden for physically and mentally disabled
Heron way community allotment - permaculture allotment for nature and people
Salopian Gardens
Thai upon Thames - river clear up
Friends of the River Crane - maintaining and improving 17 miles of Crane
Abundance London - biodiversity in Chiswick (original home of RHS)
Cultivate London
Air Quality Brentford
Not to mention individual resident actions of which there are several.

Overlooked issues

Topics or issues which have been overlooked, which the Environment Committee should scrutinise in greater detail;
• On these, the Committee would welcome a short summary (around 250 words) of the issue, how it affects London, and what the Mayor or other stakeholders could do about it.

The main issue I think is the loss of "weeds" in London due to the loss of old knowledge and skills, an unhealthy obsession with tidiness, too many privet hedges removed, block paved drives, biodiversity sensitive management and cultivation has been taken over by brute force of machinery and poisons, resulting in loss of UK wildlife due to "no lunch" . Staff employed to "maintain" maybe lack recognition skills of UK plants so everything is just "a weed" or they are over bureaucratised or under budget constraints with too much to do, with to little money, resources and time.

Ideally I'd like the reconciliation to be seasonal plans
No mow April to June - edges only if mowing needed Inc central reservations which keep getting hacked to death just before wildflowers get a chance to seed
Hard prune Maintenance in autumn and leave everything over winter though leaves of course pose a h&s risk
All parks and landscape teams need to be supported by a biologist/entemologist/botanist/naturalist to help them build skills and knowledge on the job
Or
Councils to employ specialists who's job is to survey borough and make reports to council to improve biodiversity - I do see improvements but not nearly sufficient against loss over my lifetime

Insufficient trees planted - everywhere needs a survey to ensure there's enough trees, particularly alongside roads or on central reservations.

Some places are still devoid of even basic greenery and trees can help as we know to capture emissions and heat.

I think that all London stakeholders should have a quarterly meeting with MoL Ambassador for Nature to help create biodiversity plans and feed that back to MoL to create a cohesive group, 1 person from each stakeholder is elected to attend for 1 year term. Ambassador has certain powers such as enabling funding to be channeled so it's getting to the projects that might not get funding if for example they're small or lack capacity and access to decision makers who can make quick decisions to ensure quick, flexible responses to cut through red tape in safe way.

We just need to remember to love nature instead of concrete. To celebrate nature not destroy it and to empower and embrace those who are so desperately trying to save it as this is about saving people too. Ecocentric not Egocentric living.

Submitted by: Dr Francesco Aletta, University College London

This submission responds to Area 4: "Topics or issues which have been overlooked", with specific reference to air quality and noise.

Overlooked issue: the absence of a soundscape-based policy framework beyond noise reduction

London's Environment Strategy adopts a predominantly **traditional environmental noise management approach**, focused on exposure levels, thresholds, and mitigation. This provides a strong public-health foundation, but it overlooks an important opportunity to address how Londoners **perceive, use, and value sound as part of everyday urban life**.

While the Strategy refers to tranquillity, respite, and good acoustic design, these concepts are not formalised into a coherent **soundscape framework**. There are no perceptual or participatory indicators, and soundscape is largely treated as an *outcome* of noise reduction rather than as a **planning and design tool** that can shape place quality, cultural life, and social interaction.

International practice shows that alternative approaches are possible. In **Malmö, Sweden**, the city has introduced a *"cultural sound zone"* within a mixed industrial and cultural district. In this area, sound-producing activities such as music, performances, workshops, and creative industries are explicitly **recognised and planned for**, rather than constrained by conventional quietness objectives. The policy does not define success primarily in terms of low sound levels, but instead in terms of **context, cultural identity, coexistence of uses, and residents' expectations**, supported by spatial design, buffering, and stakeholder engagement.

This example demonstrates how soundscape-based planning can complement public-health protection while enabling vibrant urban life. For London, such an approach could be particularly relevant in dense mixed-use areas, transport hubs, cultural quarters, and public spaces where further noise reduction is difficult, but **quality of experience still matters**.

The Committee may wish to scrutinise how London could move beyond threshold-based noise management by integrating soundscape assessment, participatory methods, and international standards (such as ISO 12913), to support healthier, more inclusive, and culturally expressive urban environments.

_____

Dr Francesco Aletta (AFHEA, MIOA, FDIRDI)

Associate Professor in Building Physics & Soundscape

Module Lead for BSc/MEng SBEER
Module Lead and Deputy Programme Lead for MSc HWSB
Chair of the BSEER Local Research Ethics Committee

UCL Institute for Environmental Design and Engineering

The Bartlett, UCL Faculty of the Built Environment
Central House, 14 Upper Woburn Place
London WC1H 0NN

Measuring Urban Heat Island Intensity in London During the Warmest June on Record

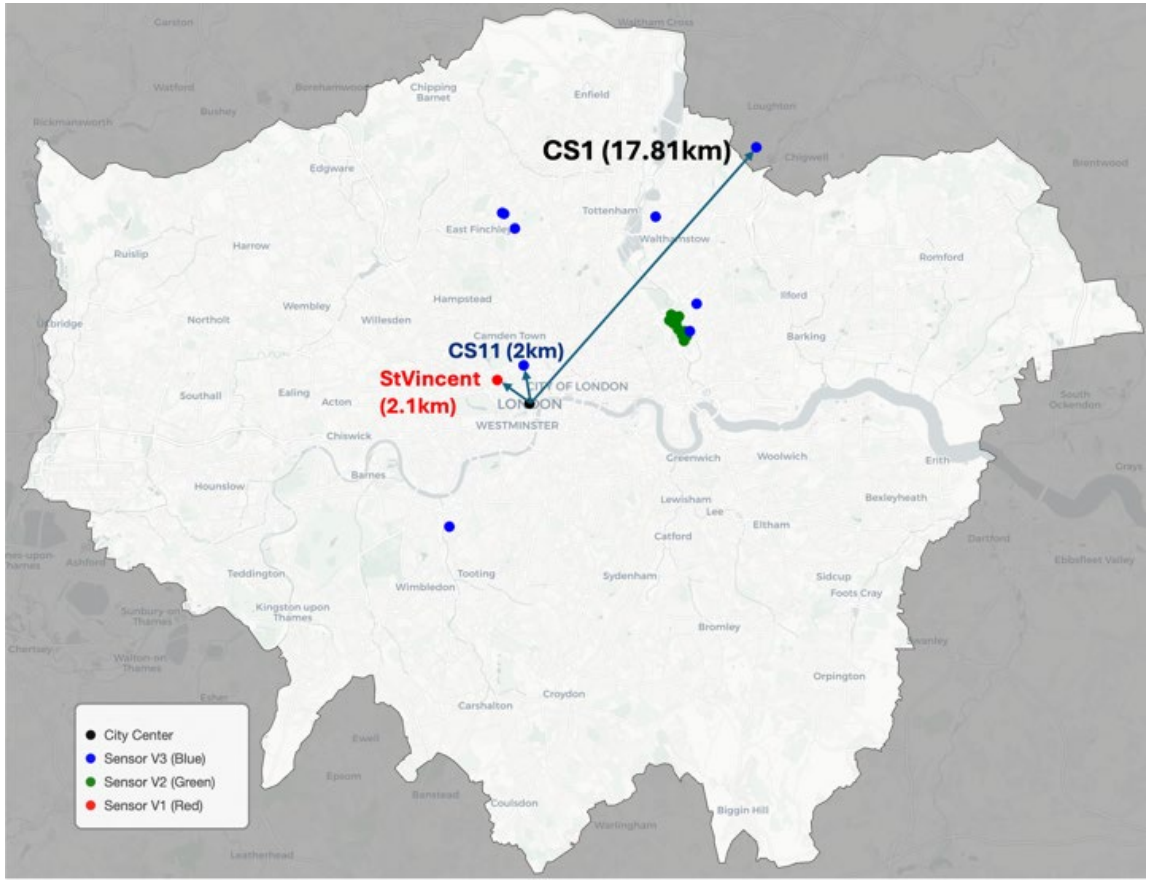
Dongyi Ma
Bartlett Centre for Advanced Spatial Analysis (CASA) UCL

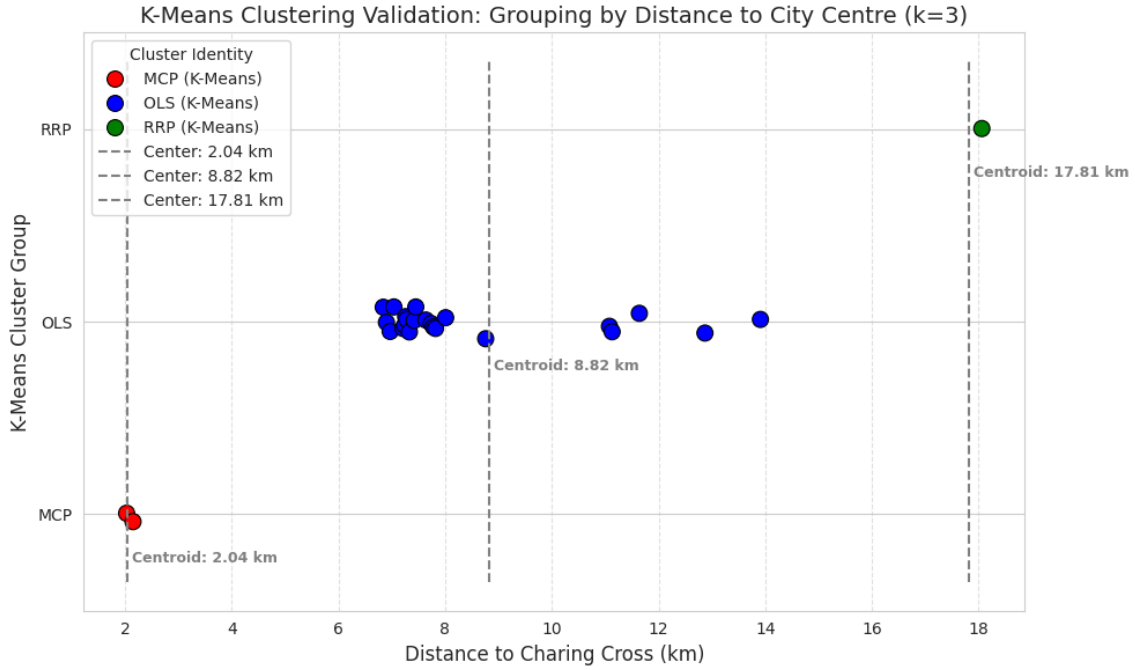
January 2026

Introduction

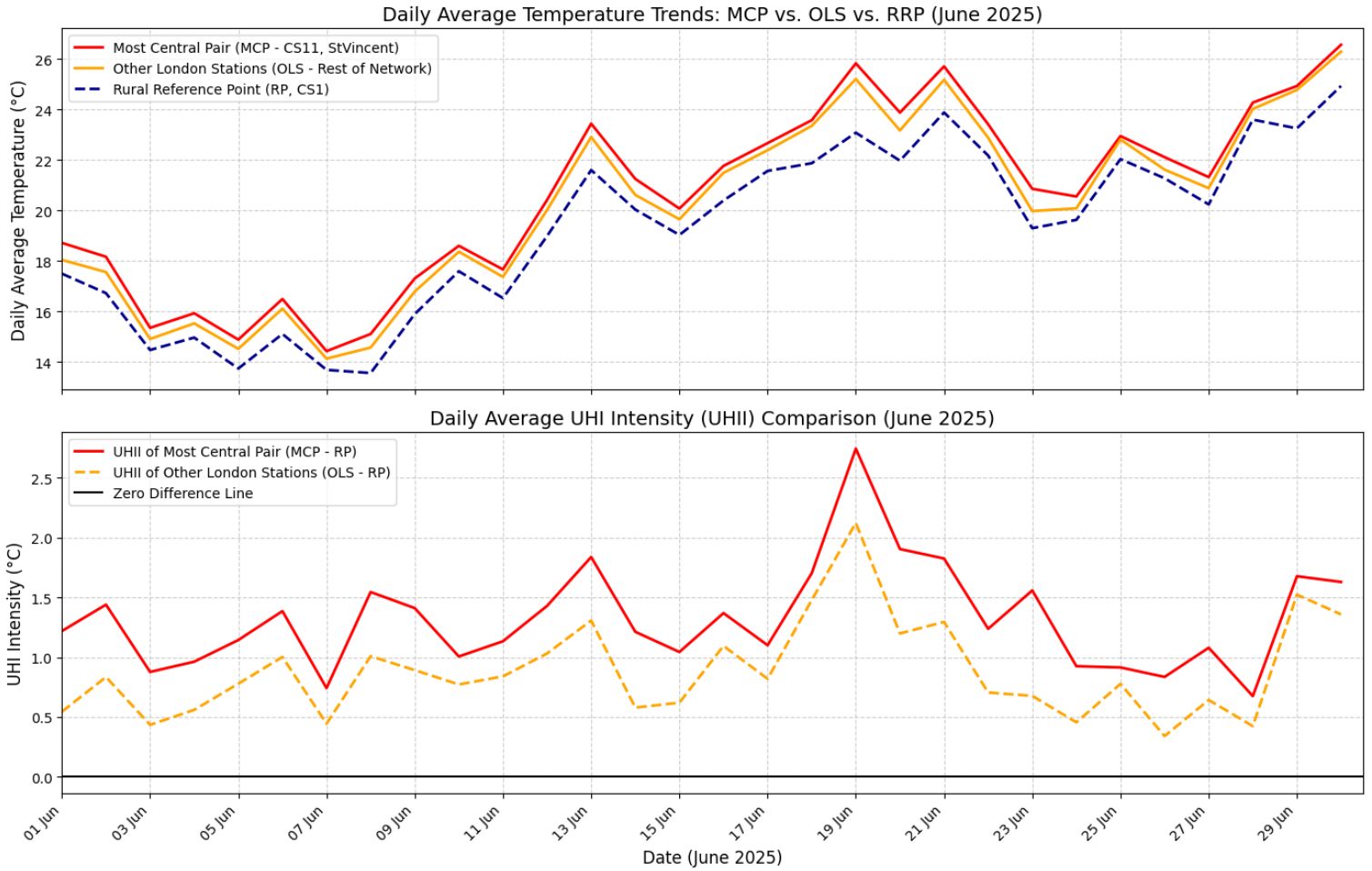
- June 2025 was the war mest June for England on record, featuring two heatwaves between 16–21 June and 27–30 June according to the Met Office (Met Office, 2025).
- Purpose: provide street-level evidence of Urban Heat Island Intensity (UHII) across Greater London during extreme heat
- Method: bespoke IoT air temperature sensor network using LoRaWAN communication
- Deployment: 25 locations, 2–17.81 km from Charing Cross (covering central, intermediate, and reference areas)
- Analysis: spatial gradients, diurnal behaviour, and heatwave amplification
- Key question: where and when are heat risks highest at neighbourhood scale, beyond what sparse stations can capture?
- Output: empirical evidence to support London climate adaptation and heat-risk planning

Spatial Distribution of the 25 Sensors across Greater London

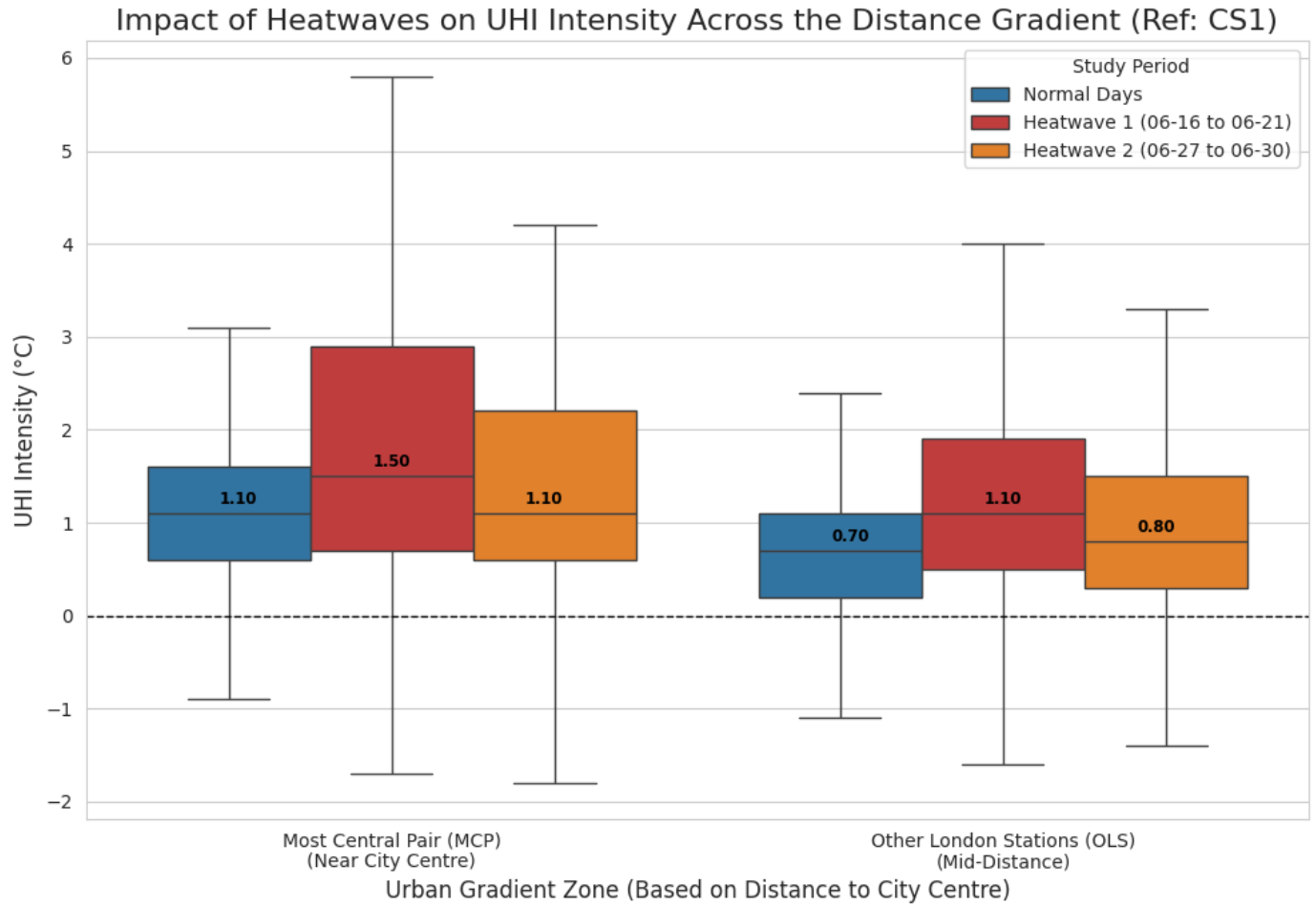




Diurnal Temperature Variation and Computed UHI Intensity across Sensor Clusters



Comparison of Heatwave and Non-Heatwave UHI Intensity (June 2025)



Findings

- Evidence: measured UHII ranged from 0.4°C to 2.8°C across London (25-site network)
- Heatwave effect: UHII increased during the two heatwave periods
- Spatial pattern: higher temperatures closer to central London; QEOP showed a cooler cluster consistent with park-cooling
- Policy relevance: street-level monitoring identifies local heat-risk hotspots not visible in sparse official networks
- Recommendation: support a coordinated city-wide heat monitoring network combining reference sites and scalable low-cost sensing
- Use case: evaluate cooling interventions (urban greening, shading, materials) and target heat-risk actions where needed most

SIGNATURE SUSTAINABILITY

I am writing in response to the London Assembly Environment Committee's **Call for Evidence** on London's Environmental Priorities and Progress.

Who I am:

- I am a London-based built environment professional and doctoral researcher specialising in whole-life carbon, Passivhaus and EnerPHit housing, and sustainable retrofit of existing homes.
- My work focuses on reducing both operational and embodied carbon in real residential projects.

Issue I am raising: Retrofit of existing housing stock

- If London is serious about meeting its climate targets, large-scale, high-quality retrofit of existing homes must become a central priority.
- New build alone will not deliver emissions reductions at the speed or scale required.
- Retrofit is also one of the strongest opportunities to reduce fuel poverty, improve health outcomes and create skilled local jobs.

What is going well:

- There is growing awareness of retrofit across boroughs and some positive pilot programmes.
- The Mayor's focus on decarbonising homes and improving energy efficiency is welcome.

Barriers to progress:

- Funding remains fragmented, short-term and unpredictable, making it difficult for local authorities and supply chains to scale.
- Delivery quality is inconsistent, with performance gaps between design and real-world outcomes.
- Leasehold, private rented and mixed-tenure buildings are particularly difficult to unlock.
- Current approaches often focus only on operational energy and ignore embodied carbon impacts of materials and interventions.

What is being overlooked:

- Whole-life carbon thinking is still not embedded in retrofit decision-making. Without considering embodied carbon, some retrofit measures risk undermining long-term climate benefits.
- There is insufficient emphasis on a "retrofit-first" approach across housing policy, planning and funding frameworks.
- Skills, accreditation and quality assurance across the retrofit workforce are not yet at the level required.

What I would like the Committee to scrutinise:

- How retrofit success is being measured, and whether whole-life carbon is included rather than energy-only metrics.
- Whether current funding models are sufficient to support long-term, area-based retrofit programmes.
- What actions are being taken to address skills gaps and ensure quality delivery.
- How harder-to-reach tenures such as leasehold and private rented housing will be addressed at scale.

I would welcome the opportunity to contribute further to this discussion and would also be interested in participating in the roundtable if appropriate.

Kind regards,
Harshul Singhal

Best regards,

Harshul Singhal LEED AP (BD+C), B.Arch., MS in Bult Environment, PhD. Under Progress
Founder and Building Energy Analyst (**Signature Sustainability**)
Doctoral Researcher Associate - Net Zero Buildings UK **(Brunel University of London)**
London, United Kingdom

Helen John
Sutton resident, Landscape Architect, Sustainability Consultant, Climate Scorecards Ambassador, Building with Nature Assessor.
Chair of Burnell and Lewis Residents Association, Sutton.

Dear Members of the London Assembly Environment Committee,

Thank you for the opportunity to contribute to your inquiry into progress against the London Environment Strategy and the Mayor's environmental mandates. I am writing to offer a perspective from the London Borough of Sutton, drawing on my own experience, the lived experience of local residents, and a comparative review of planning policy across Sutton and other best-practice local authorities.

Overall, Sutton demonstrates strong community commitment to environmental improvement and constructive engagement with the Council and the GLA's ambitions. However, the evidence suggests that there remains a significant gap between strategic-level progress reported by the GLA and the policy frameworks, governance structures and delivery mechanisms available at borough level to realise those ambitions.

Air Quality and Noise

The GLA reports significant progress on air quality, particularly through the expansion of ULEZ. These improvements are welcomed in principle by Sutton residents, who strongly support cleaner air.

However, Sutton remains poorly served by Transport for London investment. While the borough benefits from a relatively strong north-south Thameslink connection, it lacks Underground or Tramlink services, and long-standing proposals for improved mass transit links have been abandoned. As a result, residents remain highly car- and van-dependent.

The ULEZ expansion has had a disproportionate impact on Sutton residents working in the trades. Many rely on petrol or diesel vans, and the cost of compliant or electric vehicles remains prohibitive. Greater, targeted support for outer London boroughs - including electric van schemes and affordable finance - is essential to ensure that air quality improvements do not exacerbate inequality.

Local air quality concerns are further compounded by the Beddington Energy Recovery Facility. Sutton residents bear an unfair environmental burden arising from inadequate recycling across London, while Sutton seeks to expand incineration capacity to manage waste from other boroughs, contrary to circular economy principles.

Waste and the Circular Economy

While the GLA reports progress towards a circular economy, Sutton residents experience a continued shift towards incineration. Financial incentives favour incineration over recycling,

undermining waste reduction efforts. Residents frequently observe recycling contamination during collection, eroding public confidence.

At the same time, there are positive signs. Sutton Council officers and councillors have engaged with community groups on waste and recycling, and there is strong resident appetite for improved performance. However, without London-wide policy and funding mechanisms that actively disincentivise incineration, borough-level efforts remain constrained.

Biodiversity and Blue and Green Spaces

Sutton benefits from particularly strong community assets in this area. Friends of Parks groups are active and well organised, and community volunteering related to green spaces and biodiversity is a notable strength.

Sutton Council has also established an Environment Champions group, bringing together residents and stakeholders to help steer the borough towards a greener future. The group has engaged with community energy organisations and council officers on biodiversity, waste and recycling, demonstrating positive local collaboration.

However, delivery is hampered by slow officer response times and the absence of up-to-date strategies. Sutton has yet to refresh its Biodiversity, Parks and Open Spaces and Tree Canopy strategies. Comparative analysis of planning policy and strategies shows that other councils embed biodiversity net gain, nature recovery and adaptation requirements directly into statutory planning policy, providing clarity and certainty for officers, developers and communities alike.

Greenhouse Gas Emissions, Energy Use and Planning Policy

While the GLA reports leadership on climate mitigation, Sutton continues to perform poorly on emissions. This is driven in part by structural transport issues, but also by weak planning policy.

Comparative analysis with best-practice councils shows that Sutton's planning policies lack enforceable requirements for net-zero ready development, energy efficiency and demand reduction. Other authorities have demonstrated that stronger, planning-compliant policies are both lawful and deliverable.

Adapting London to Climate Change

Climate adaptation remains a significant weakness locally and a major source of frustration for climate activists. Independent assessments show limited focus on adaptation, and while mitigation is referenced in Sutton's corporate risk register, adaptation is largely absent.

A key governance issue is the Council's reluctance to embed climate adaptation within the portfolio of the Section 151 (Head of Finance) Officer. As a result, adaptation is not integrated into financial decision-making. This has contributed to repeated stalling of

initiatives such as street-level retrofit and resilience schemes, despite community support and clear need.

Best-practice councils demonstrate that embedding climate governance, monitoring and adaptation responsibilities within core financial and planning functions is both feasible and effective.

Conclusion

Sutton illustrates both the strengths and the challenges of London's current environmental governance. There is strong community engagement and willingness to deliver the Mayor's ambitions locally. However, progress reported at GLA level is not consistently matched by borough-level capacity, policy clarity or governance structures, particularly in outer London.

Without stronger alignment between GLA ambition, borough planning policy, transport investment and climate adaptation governance, London risks overstating progress while entrenching environmental inequality.

I would be happy to provide the Committee with the accompanying comparative planning policy analysis referenced above, although as you'll know, the results of all UK councils can be viewed at CEUK. Residents would welcome more input into this inquiry - but please could you give us more notice as this was posted to us just this morning.

Yours sincerely,

Helen John
Sutton resident, Landscape Architect, Sustainability Consultant, Climate Scorecards Ambassador, Building with Nature Assessor.
Chair of Burnell and Lewis Residents Association, Sutton, SM1 4EE.

Please see below the submission from Global Action Plan to the Environment Committee's Call for Evidence on Progress on Environmental Priorities. Our submission has focussed on the environmental impact of data centre construction as an issue that we urge the Committee to scrutinise in greater detail.

Submission to the Environment Committee:

More than 100+ 'hyperscale' AI data centres are planned or under construction in the UK, half of which are in London and neighbouring boroughs. This warrants urgent environmental investigation: emissions from just ten planned UK data centres will wipe out this year's CO2 savings from the switch to EVs.

Data centres consume enormous amounts of electricity.

According to the IEA, 'A typical AI-focused data centre consumes as much electricity as 100,000 households' with the largest under construction today expected to consume 20 times as much.

NESO predict UK data centres in 2050 will use as much electricity as the entire commercial sector does today.

The increased emissions associated with this additional electricity demand is in direct conflict with decarbonisation goals.

Water usage is also of concern. Thames Water estimates a data centre requires up to 19m litres of water per day. Many water companies don't know how much water they supply data centres, and developers do not disclose. This requires urgent investigation.

Action the Mayor and other stakeholders should take:

- The London Plan to include dedicated data centre policy to address their significant energy and water impacts
- Publish the results of the GLA's Infrastructure Coordination Service data centres forecasting project as soon as it is ready
- A framework that sets out how many data centres are needed, where, what for, the acceptable limit of environmental harm they cause, and how they must mitigate that harm for London
- Call for the government to implement this framework across the country
- Demand full transparency from developers regarding power and water usage

Best wishes,

Anisah Khan
Parliamentary Campaigns Manager

Global Action Plan – Our Lives. Our Planet.
LMLF.203 The Leather Market, Lafone House
11-13 Weston Street, London, SE1 3ER

Cllr Dave Tchil
Hackbridge

I'm writing to ask that the call for evidence for London's Environment takes into consideration emissions from incinerators or Energy Recovery Facilities.

In the context of the impact on air pollution and accumulation of chemicals in the wider environment, the Mayor's Office should work with academic partners to take a view of the health impact of burning materials in London suburbs.

The Office should review the volume and concentration of all emissions at micro/local level and London wide level. It should consider the emission exceedances from sites and previous malfunctions and management.

It should also be seeking to stop any permits to burn more and activity looking to reduce their use.

Labour Group

Hello.

London Parks and Gardens [LPG] is a small charity celebrating and protecting London's heritage landscapes. Our annual London Open Gardens fundraising weekend generates some 40,000+ garden visits across more than a hundred green spaces concentrated in TfL Zones 1 and 2. Feedback regularly rates the event highly and a shared refrain is how the event transformed visitors' perceptions of the capital (for the better). This reflects the emotional attachment Londoners and tourists (domestic and international) feel towards greenspace and the cultural and heritage value these spaces hold. *Something we believe is overlooked in your environment strategy*.

I am attending your 3rd February roundtable sessions and am keen to explore how we can work with London Assembly members and staff to develop ways to monitor and record the social and historic environmental value of public spaces, then utilise the data to enable better planning, development and engagement.

LPG is investing heavily in a new website and activities designed to grow awareness of the true value of public greenspaces to society to both record and grow the love for parks and gardens. People protect what they love, leading to a better-quality city with improved neighbourhood cohesion and resilience. This is most readily observed in community gardens where diverse cultures and people come together with a common purpose.

I'll finish by quoting the report by Vivid Economics commissioned by the Mayor of London which concluded: "London's public green spaces have a gross asset value (to the public) of £5b a year, amounting to £91b over 30 years of value…".

Embracing and enhancing these valuable assets pays dividends in all sorts of ways; supporting biodiversity, nature based services, social harmony, physical health and wellbeing, air quality and can even address areas of inequality while supporting good development.

Yours,

Tim Webb
Interim Director

A Decade of Air Quality in London: NO_2 and $PM_{2.5}$ decrease but O_3 increases

NO_2 and $PM_{2.5}$ Decrease

Like most of the UK[1], London has witnessed robust reductions in the concentrations of NO_2 (Figure 1).

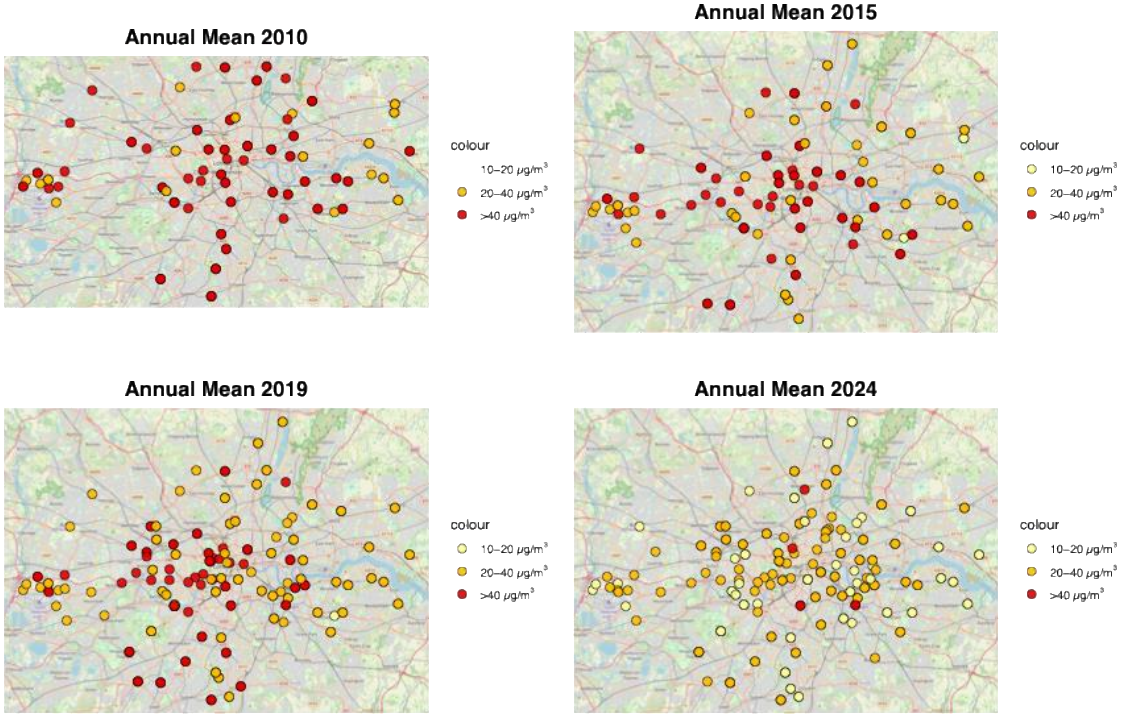


Figure 1. Annual mean NO_2 concentrations for 2010, 2015, 2019 and 2024. (Minimum 75% data coverage for each site)

Along with reductions in $PM_{2.5}$[1], this has constituted a substantial improvement in UK AQ over the last decade. Across London monitoring sites from the AURN, AQE, local and KCL/Imperial networks, the median site exceeded the NO_2 and $PM_{2.5}$ WHO 2021 air quality targets[2] on 300 and 81 days in 2016 respectively (Figure 2). This dropped to 120 and 51 days in 2025. While this is positive news for public health, more must be done: these targets should not be exceeded on more than 4 days per year.

Comparison[1] of urban traffic and urban background sites across the UK suggests most of the NO_2 reduction has been driven by traffic emission reductions. $PM_{2.5}$ has a wider range of sources. Long-range transport from other parts of the UK and continental Europe contributes more to $PM_{2.5}$ than it does to NO_2. Nevertheless, **there are many local sources of $PM_{2.5}$ include domestic heating and traffic**.

Ozone Increases

In contrast to NO_2 and $PM_{2.5}$, ozone (O_3) has increased over the last decade (Figure 3) with the median site's exceedance frequency rising from 1 day in 2016 to 21 days in 2025.

One driver is the reduction in NO_x=(NO+NO_2)-driven suppression of O_3 following the (beneficial) decreases in NO_2. A key precursor to local O_3 production is volatile organic compounds (VOCs). VOCs are produced by traffic, certain industries (e.g. solvents) and agriculture[3] and, despite falling since 1990, VOC emission reductions have not kept pace with reductions in NO_2. While O_3 represents a smaller AQ issue than NO_2 and $PM_{2.5}$ at present, it will likely continue to increase, particularly in a warming world. **However, reducing local sources of VOCs will help mitigate O_3 increases.**

[1] Weber and Dacre (2025) https://doi.org/10.1039/D5EA00055F
[2] World Health Organization, https://www.who.int/news-room/feature-stories/detail/what-are-the-who-air-quality-guidelines
[3] https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-non-methane-volatile-organic-compounds-nmvocs

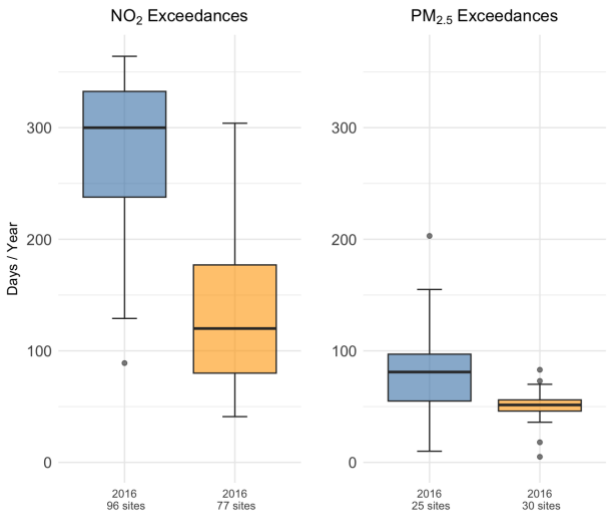


Figure 2. Number of exceedances for NO_2 and $PM_{2.5}$ for London sites for 2016 and 2025. (Minimum 300 days data per year for each site).

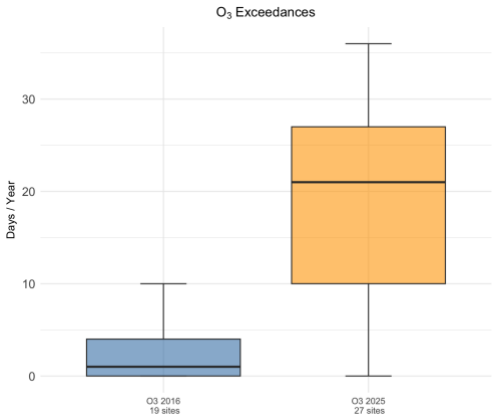


Figure 3. Number of exceedances for MDA8 O_3 for London sites for 2016 and 2025. (Minimum 300 days data per year for each site).

Call for evidence: 'London's Environment - progress on priorities'
Environment Committee, December 2025.

Re: Delivering a Greener, More Climate-Resilient London:

- 1) **Example of progress,** including short case studies where relevant, that London is making on its environmental priorities;
- 4) **Topics or issues which have been overlooked**: Not enough focus is being put on templates for action to achieve the productive potential of London's urban woodlands for timber. There are too few examples of how active woodland management can be linked to expanded community use, sustainable economic growth and enhanced local ecologies in London's urban woodland. We show how this can be achieved through a process of regenerative design that is applicable to other urban woodlands, helping achieve goals set out in the GLA's London Urban Forest Plan.

Short Case Study: Expanding design models for enhanced utilisation of London's woodland resources.

Project: FORESTED (**F**uture-**O**riented **R**egeneration of **E**cological **S**paces through **T**imber, **E**ducation and **D**esign) is a 12-month regenerative design research project led by George Fereday of London Metropolitan University. We are working with Bexley Council and the Royal Danish Academy, to enhance ecological citizenship in Lesnes Abbey Woods by creating community-made woodland furniture from local timber, using digital design tools and volunteer engagement. Funded by the RCA's Ecological Citizen(s) Network+ / EPSRC, the project aims to boost community engagement, ecology and woodland use, offering a model for bioregional stewardship that benefits nature and society in London.
Principal Investigator (PI): George Fereday, Associate Teaching Professor, School of Art, Architecture & Design, London Metropolitan University.
Co-investigator: Dr Xan Browne, Assistant Professor, Royal Danish Academy.
Partner: Ian Hunt, Estate Manager, Lesnes Abbey Woods, Bexley Council.

Summary:

Active management of urban woodlands for timber can offer significant benefits, improving environmental quality, increasing biodiversity and providing social and economic opportunities. This green infrastructure is under-utilised as a source of sustainable materials, constraining growth of an urban woodland culture. In current traditional forestry practice, it is economically unviable to utilise these urban forest types and emerging design models are often reliant on inaccessible technologies that inhibit wider uptake. This project is situated within Lesnes Abbey Woods where we investigated how novel design models can support uses of mixed hardwood for functional amenities through community engagement, informed by data. Volunteer making workshops facilitated design development, testing, and realisation of furniture where we identified complementary constellations of materials, tools, processes, and design outcomes. Urban woodland has the potential to be ecologically advantageous, consisting of continuous cover, mixed-ages, multi-specie hardwood trees which also represents a diversity of material traits that lend themselves to a variety of design criteria. This diverse resource presents the potential for a renewable wood practice, in which cycles of growth and utility are balanced.

Methods:

Our project promotes a template for local ecological citizenship that connects urban woodland management, digital tools and low-cost community fabrication of public furniture. The project took place in a Bexley council-owned woodland and engaged community volunteer groups in advocacy for the local ecology through a process of furniture making, informed by digital tree scans. Low-cost tools and machine processes were used in the fabrication of the furniture in-situ, informed by efficient digital simulation to improve design decisions. The development of low-tech methods for processing joining and assembly prioritised two formats: cleaving, a low-tech method for splitting round-logs, and mechanised milling, a common method for sawing logs into timber boards. Using irregular tree forms, we develop assembly strategies that are accommodating of variation. This includes stacking, doweling and stitching - joining methods widely applied to timber construction prior to the development of metal fastenings. Photogrammetry-LiDAR tree scanning provided accurate tree form analysis to facilitate timber processing simulation and design-for-assembly workflows that could accommodate the idiosyncrasies of tree forms regarded as financially unviable. Tree scanning also provided accurate simulation of sawing and cleaving (splitting) of the selected trees prior to felling to minimise local ecological impact (fig.1). Prototype furniture and jointing methods were tested at the 1:2 scale with a focus on simplicity and high timber yield. This methodology ensured strategic tree harvesting for both ease of fabrication with volunteers, and ecological gain.

Outcomes:

The following output will result from the project:

- An open-access archive of 3D models was disseminated online to enhance public understanding of the methodology which connects urban forest management, use of locally- grown hardwood, and pro-active ecological citizenship.
- A collection of exterior and interior grade furniture was fabricated and installed with the help of local volunteers for public use within the urban woodland from which the trees were sourced (fig.2).

Conclusions:

Targeting hardwood species and unconventional tree geometries for use in furniture making ensured the design methods aligned with local urban forest plans and regional strategic land-use policy (London Urban Forest Plan / LUFP), namely to:

- “Manage more urban woodlands to maximise their benefits for people and wildlife,” (LUFP, Goal 2)
- and to “Recognise the productive potential of urban forest and support woodland enterprise.” (LUFP, Goal 10).

Digital interfaces facilitated unorthodox tree selection through simulation of timber processing and fabrication workflows, whilst also helping to communicate the design methods through public communication at the end of the project. The fusion of digital data, sustainable local timber, accessible fabrication processes and in-situ community making workshops, facilitated new ecological advocacy and woodland enterprise. This work serves as a template for invigorating woodland culture in other urban woodland sites, for the mutual benefit of local ecologies and communities.

Links:
FORESTED webpage (URL)
RCA - Ecological Citizens Network + webpage. (URL)

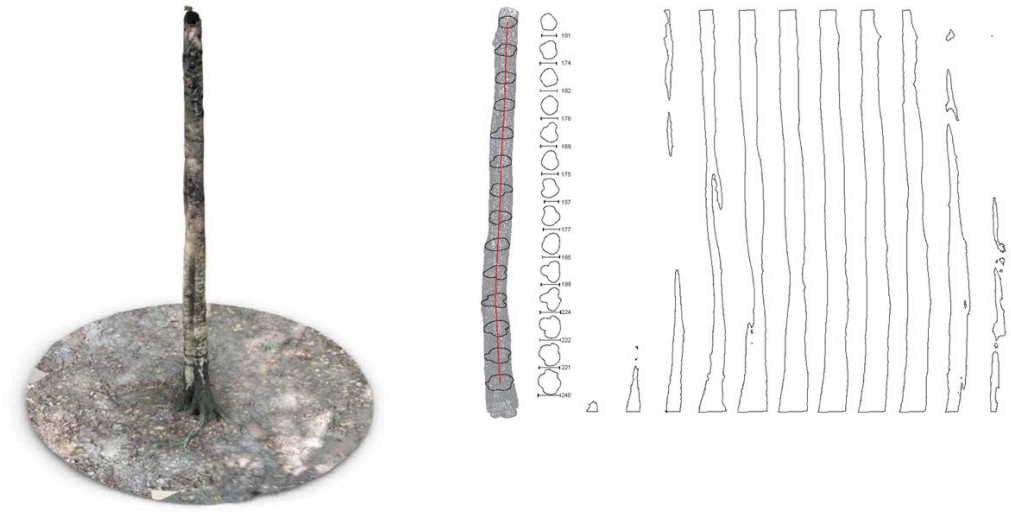


Figure 1 – Left: Photogrammetry tree scan of a silver birch tree, Right, digitally simulated tree milling analysis (horizontal and vertical).

Figure 2 - "Figure 2 - Cleaved, stacked and dowelled woodland furniture at Lesnes Abbey Woods. CAD render on original photography by Jim Stephenson."

Contact: George Fereday, Associate Teaching Professor, London Metropolitan University

London Borough Newham - Local Plan Hearings - Matter 12 - Green and Blue Space policies

Our concern is focused on Modification MO130, which removes the proposed community growing space designation from the West Ham Park Nursery Site. This is a late and significant change to the Local Plan. It alters the policy position on a sensitive, historic piece of land, and it does so without a clear evidence base or prior public consultation.

The Nursery Site has always formed part of West Ham Park. Historic England includes the Nursery Site fully within the Grade II registered park boundary, and the land has never existed as a separate parcel. It was historically mainly open parkland before being incorporated into nursery operations, and for many decades parts of it were used for community events, plant sales, and park-related activities. It is not brownfield land and has never been treated as such.

The Regulation 19 draft Local Plan correctly recognised this by designating the Nursery Site as protected green space for the first time. As we explained in our statement, this designation finally aligned planning policy with the historical and factual reality of the site.

The Friends strongly supported that designation.

MO130 now removes it, without any justification being supplied.

Newham's own documents show how serious the green-space shortage is in this borough. In its Matter 12 statement, the Council explains that Newham already has one of the lowest levels of public green space in London, and that as the population grows the situation will get worse. The borough would need around 68 hectares of new green space just to maintain today's already inadequate level.

The Council also highlights a significant lack of allotments and community growing spaces — just 0.05 hectares per 1,000 residents, far below recommended standards.
So the evidence clearly points in one direction: Newham urgently needs more green and growing space, not less.

That is why this late removal of the West Ham Nursery Site designation is so difficult to understand. The modification gives no explanation at all for taking away a use that directly addresses these shortages. And it contradicts the Local Plan's core green-space policy, GWS1, which says Newham must protect all existing green spaces and increase provision wherever possible. MO130 does the opposite.

The City of London submitted late representations arguing against the green-space designation, and some of their claims about the site's history are factually incorrect. Making a major change to the Local Plan in response to these late comments — without public consultation and without evidence.

To conclude:

- The Nursery Site is unequivocally part of West Ham Park.
- Newham's own evidence shows a clear need for more green space.
- No justification has been provided for removing this designation.
- The change is inconsistent with the Local Plan's own green-space strategy.
- And it appears driven by late lobbying rather than transparent evidence.

It is now not clear what the designation of the Nursery site is now proposed to be in the Local Plan. It would appear to be only the Grade II heritage designation which is completely inconsistent with the rest of the park for no evidenced reason. Therefore, the whole Park, including the nursery site should have a uniform designation of MOL, SINC and Grade II Heritage listing.

For these reasons, we respectfully submit that Modification MO130 is unsound.
We ask that the Inspector recommends retaining the earlier designation of the Nursery Site as protected green space, including community growing space. This is consistent with the history of the land, the needs of the borough, and the evidence underpinning the Local Plan.

———————————-

Extracts from Local Plan Hearing documentation. These show the background considerations about WHP proposed status in the Local Plan.

(1) Matter 12 - Extract from LBN document: Examination document EWS053

The Review also considered four additional green space parcels identified through the Green and Water Infrastructure Strategy (GWIS) as being potentially strategically important. These were assessed against the London Plan MOL criteria.

1.22 The recommendations for these additional parcels were: • Designation as MOL for:
- A33: West Ham Park
- A34: Thames Barrier
- A35: Water Works River
- A small parcel east of City Mill River, proposed as an extension to the existing A32: Olympic Park Lee Valley MOL designation.

1.23 The policies map reflects the recommendations of the MOL Review. As such, the proposed MOL designations and boundary amendments are consistent with the London Plan (2021), and have been prepared in accordance with Policy G3, clause C, which allows for boundary changes through the Local Plan process.

1.24 After Regulation 19, the Council considered an amendment to the proposed West Ham Park MOL parcel (A33) to include the West Ham Nursery site. The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. As such, and after internal legal advice, we considered that this wider parcel met the definition of MOL in the London Plan. However, on receiving further legal advice, it was considered that the change to the proposed MOL boundary could not be made at this point in the plan making process. The Council is proposing to remove the proposed ‘community growing space ’designation from the West Ham Nursery site, this is set out in in the Schedule of Proposed Modifications to the Regulation 19 Draft Submission Local Plan (SD004, modification: MO130).

1.25 It should be noted that the following representation responses incorrectly refer to the proposed extension to MOL parcel A33 (SD026):
• Community Group Rep Reg19-C-008/001a
• CPRE Reg19-E-014/010
• City of London Reg19-E-177/010
• Reg19-E-177/011
• Reg19-E-177/013

- Reg19-E-177/015
- Reg19-E-177/017
- Reg19-E-177/032
- One Newham Reg19-E-244/049

1.26 The correct consultation response is provided in the summary of responses in Appendix 2 of the Regulation 22 Statement (SD017, p 240 -241). SEE BELOW

1.27 The Council has engaged with the Mayor of London and adjoining boroughs through the Duty to Cooperate process. The Duty to Cooperate Statement Addendum (2025) [SD052] confirms that neighbouring boroughs raised no objections to the methodology or outcomes of the MOL Review. The GLA also raised no concerns in their Regulation 19 response. The Council therefore considers that the requirements of London Plan Policy G3 have been met.

(2) Appendix 2 of the Regulation 22 Statement (SD017, p 240 -241)

West Ham Nursery - submissions received :
The CPRE set out that West Ham Park should be designated as a Local Green Space in its entirety, including the nursery site.
One community group (One Newham) and one resident supported the designation of the site as green space.
The City of London objected to the designation of West Ham Nursery Site as a green space under the sub-category of ‘community growing space’. It also critiqued the methodology and findings in Newham’s Green and Water Infrastructure Strategy (2024). It contends that the site is previously developed land.

West Ham Nursery - LBN Response
The Council’s objective for this policy approach is to ensure the Local Plan positively prepared, protecting, enhancing and delivering a network of accessible green space, to meet the needs of the population both now and over the plan period (to 2038). The West Ham Nursery site forms part of the wider Historic England West Ham Park, Grade II Park and Garden site national designation. Being on the Register means that the West Ham Nursery site is subject to a statutory designation, and has the same weight in policy terms under the National Planning Policy Framework (NPPF) as scheduled monuments and listed buildings. In NPPF terms, it is a ‘designated heritage assets’.
As such, and after internal legal advice, we consider that the West Ham Nursery site's designated heritage asset status, which is a material consideration in the planning process, provides the necessary protection required. The Council recognises the importance of ensuring the plan is positively prepared and therefore has drafted the following modification -

Remove proposed community growing space allocation at West Ham Nursery Site.
The Local Plan does not consider this to be a suitable site for housing and as such it is not being designated as a Site Allocation. It should be noted that this would not preclude an application for development coming forward on this site. Any application would be assessed on its statutory heritage designation and against the policies in the adopted Local Plan.

(3) Extract from Regulation 22 Assessment of MOL sites within LBN - document EB069

MOL Area 33 Assessment
MOL area Neighbourhood Area
A33
West Ham Park
N9 West Ham

Status
Proposed MOL parcel

Physical structure / general description
Commentary
Type of open space Size (ha)
District Park 26.23

Note:LBN document includes maps which did not copy but show the MOL designation as covering all of the WHP site apart from the Nursery

London Plan MOL Criteria A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area'
Moderate structural value, with built development generally absent across much of the area. There are a number of small scale built facilities within the parcel which are ancillary to the sport and recreation activities which take place in the park.

The park is clearly distinguishable from its adjoining built up areas. Trees or scrub along all boundaries screen adjacent development well, with very local localised views of adjacent urban development resulting in a well-defined sense of openness.
The landscape structure consists of continuous wooded or tree lined edges, with flat central amenity lawn with further clusters of trees.
The parcel is an important part of remaining green space in this locality, separating urban areas and offering a sense of openness in a densely built-up area.
The parcel therefore meets Criteria A.

London Plan MOL Criterion B:' Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'
Moderate recreational value with a significant amount of the site dedicated to recreational use including sport, informal recreation and children's play.
The parcel is a District Park, providing recreational and leisure facilities for people beyond the local neighbourhood of borough-wide importance. The parcel is identified as a 'Key Centre 'in Newham's Playing Pitch Strategy (2024). As such, it provides a sports pitches (football, cricket and tennis) of borough level importance.
The parcel includes ornamental gardens, children's play grounds, football pitches, cricket nets and tennis courts.
The parcel therefore meets Criteria B.

London Plan MOL Criterion C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'
Moderate-Strong historic value. West Ham Park and the adjacent former nursery site is on the National Heritage List for England, Parks & Gardens, as a Grade II Park and Garden. The park contains features of Metropolitan value (Ornamental Garden and Fothergill Rock Garden). West Ham Park opened as a public park in 1887, laid out on the former grounds of Upton House, an estate dating back to the C16th. From 1762-80 it was owned by Dr

John Fothergill, a Quaker physician and noted botanist, who planted a famous botanic garden here. It was later owned by the Gurney family, when it was known as Ham House, but the last private owner, John Gurney was keen to sell the property. Following a long campaign it was acquired by the Corporation of London in 1874 and laid out by 1887. The parcel also included the Locally Listed building East Lodge. In addition, there are a number of Locally Listed designations around the periphery of the area and directly adjacent to the site, to the north-east, are the glasshouses located on the site of the historic kitchen gardens cited in the parcels Grade II Park and Garden listing.
Weak-Moderate Biodiversity Value. The site is a designated Site of Importance for Nature Conservation (SINC) of Borough status (SINC:NeB26, West Ham Park).
The parcel therefore meets Criteria C.

London Plan MOL Criterion D: ‘It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria’
The parcel is not part of a wider green link network. The parcel therefore does not meets Criteria D.

London Wildlife Trust

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

22 June 2025 (By email)

Dear London Plan Team,

RE: Towards a New London Plan consultation

London Wildlife Trust (the Trust) welcomes this opportunity to comment on the developing London Plan. We are writing to provide a fuller response regarding green belt release and biodiversity in addition to the comments we have provided in response to the formal consultation questions. We hope this is useful at this stage in the London Plan's development, and would be happy to discuss any of the issues further, before the draft new London Plan is finalised for the formal consultation.

Regional planning has played a vital role in shaping London as one of the greenest major cities in the world. Landmark policies such as the establishment of the SINC network, London-specific access to greenspace and nature targets and the Urban Greening Factor have worked alongside the protection of the Green Belt and Metropolitan Open Land to safeguard and expand parks, nature reserves, and green corridors across the capital. Collectively this network provides significant quality of life benefits to Londoners and supports a wide range of biodiversity, including species and habitats of national and international importance.

The Trust recognise that there is a housing crisis. There is also a climate and ecological crisis. We therefore cannot accept the status quo and need to bring wildlife back and build homes, at scale and at pace. We believe this is not a binary choice. It's not nature or homes. It must be nature and homes to help nature to recover and to create healthy, climate resilient communities that deliver good growth for all Londoners.

The Trust's position is that it is possible for the Mayor to release land in the green belt for development and still improve biodiversity, provided that existing ecological and green infrastructure networks are considered in a strategic way. The Mayor must ensure the ecosystem and biodiversity benefits provided by these networks are not eroded through inappropriate locations for new development and, just as importantly, once-in-a-generation opportunities to enhance these networks are not missed.

We recommend the following principles are essential for developing a successful strategic approach to green belt release and nature recovery for London:

1) Decisions must be informed by a robust evidence base

The Trust's analysis of data supplied by Greenspace Information for Greater London suggests that around 30% of the greenbelt is accessible SINC and that over 60% of regionally important Metropolitan SINCs are in the greenbelt. This is in stark contrast to the Mayor's figures quoted in his press release. Furthermore, London boroughs have not had a full ecological re-survey since 2009, with one dating as far back as 1992! Therefore a robust, transparent baseline needs to be established prior to any decisions on developing any areas of green belt

2) Enhancements must be ambitious and measurable

The 'Golden Rules' for greenbelt release in the NPPF are not ambitious enough with regards to nature recovery and access to greenspaces, and the outcomes that should be provided are not well defined. The Mayor should establish a framework for the GLA and boroughs to use to set London-specific targets encompassing nature recovery, climate resilience and access to nature supported by guidance such as the emerging London Local Nature recovery Strategy. BNG and UGF polices alone cannot be relied on to ensure true net gains for London's ecological and green infrastructure networks in the context of greenbelt release.

3) Strategic areas for nature recovery must be identified and safeguarded

Strategically important areas for nature recovery should be identified in all boroughs where green belt release is planned, taking into account cross-boundary connectivity. Such areas should be safeguarded through a new policy designation such as 'Wildbelt' (www.wildlifetrusts.org/sites/default/files/2024-12/The%20Wildlife%20Trusts%20Wildbelt%20briefing.pdf). LWT would welcome the opportunity to work with the GLA's planning team to develop such a policy.

The areas identified in the Mayor's Rewilding Taskforce report present significant opportunities for nature recovery in the greenbelt and should inform this approach. Feasibility work the Trust has undertaken on behalf of the GLA indicates that Fairlop Plain in Redbridge and the Gutteridge Farm/Yeading Brook Meadows area in Hillingdon have significant potential for large-scale rewilding, which would provide access to high-quality natural greenspace for existing and new communities. Such areas could be designated under the new policy as strategic Wildbelt Areas, mirroring the Mayor's approach to identifying Opportunity Areas for housing and other growth.

I have appended the lines I used in the online consultation, for convenience.

Yours sincerely,

Richard Barnes MCIEEM, CBiol
Head of Planning & External Affairs

London Wildlife Trust:

Our vision is a London alive with wildlife, with nature in everyone's neighbourhood.

At London Wildlife Trust (the Trust), we engage, inspire and enable people to connect with nature and are resolute in our ambition to reverse the declines in nature. With over 41% of our wildlife species having declined since the early 1970s, and 15% of our species like skylark and linnet threatened with extinction from much of London, we cannot accept the status quo. Nature conservation is no longer enough – we must focus on nature recovery in London.

As a grassroots movement, we are firmly embedded in London's local communities, where we look after wild places and increase people's understanding of and connection to the natural world.

Housing and Green Belt (paragraphs 2.8; 2.9; 2.10)

Principle of housing delivery in the greenbelt

The Trust recognises that there is a crisis in the supply of affordable housing in London. We are also in a climate crisis, and a nature crisis. We therefore cannot accept the status quo and need to bring wildlife back and build homes, at scale and at pace. But the choice is not binary. It's not nature or homes. It must be nature and homes. London Wildlife Trust has a strong track record of working with housebuilders to bring wildlife back to London and we stand ready to do so again

Baseline - Data accuracy

The Trust has concerns that the evidence base underlying the new ambition of development in the Green Belt is flawed. The press release that accompanied the consultation (www.london.gov.uk/media-centre/mayors-press-release/towards-new-london-plan) asserts that "The perception many people have is that the green belt is all beautiful countryside, green and pleasant land, rich with wildlife. The reality is very different. The green belt can often be low-quality land, poorly maintained and rarely enjoyed by Londoners. Only around 13 per cent is made up of parks and areas that the public can access."

Figures from Greenspace Information for Greater London (GiGL) indicate that 30 per cent of the Green Belt is covered by *accessible* Sites of Importance to Nature Conservation (SINCs), and over 6 per cent of Green Belt is other accessible open spaces (outside of SINCs), so in total that's at least 36 per cent of "parks and areas that the public can access", not 13 per cent.

It should also be noted that Areas of Deficiency in Access to Nature is not defined within Greenbelt or Metropolitan Open Land (MOL). The reason for this was 'few people live or work in such areas, and future development there is seen to be unlikely'. This methodology (fully outlined in the guidance document here https://www.gigl.org.uk/wp-content/uploads/2024/03/G020SINCAoD.pdf) was developed with the London Wildlife Sites Board (LWSB), chaired by the GLA.

Furthermore, GiGL believe that SINCs cover 41 per cent of the Green Belt, with a further 5 percent of Priority Habitats outside of SINCs, indicating that at least 46 per cent of the Green Belt is rich in wildlife.

Finally, GiGL is not aware of a London borough with Green Belt that has commissioned a full biodiversity survey since 2009, with one dating as far back as 1992! London had a rolling habitat and open space survey programme that ran from 1986 to 2008. Since 2009, updates to GiGL's database are reliant on boroughs having the resources to survey, and then sharing the results with GiGL. We are not aware of Boroughs mapping green infrastructure to a level that creates accurate new data, with re-surveys generally considering only statutory spaces, or areas already known for their significance.

Housing and nature in the Green Belt (paragraph 2.10)

We are pleased to see the linkage of any green belt development with the Local Nature Recovery Strategy (LNRS). However, LNRS is not policy, so the new London Plan needs a positive policy and designation that identifies and protects areas of potential, such as the Wildbelt designation (www.wildlifetrusts.org/sites/default/files/2024-12/The%20Wildlife%20Trusts%20Wildbelt%20briefing.pdf) suggested by the Wildlife Trusts. Wildbelt areas could include the ReWilding Priority Zones identified by the London ReWilding Taskforce, and Wildbelt policy could include a community right to buy/manage.

London boroughs should establish Local Wildlife Sites Boards in line with existing guidance, and, in partnership the GLA' Green Infrastructure team, LWT will be publishing a toolkit later this year.

LWT are concerned about the lack of ecological capacity within many London boroughs to manage the existing Biodiversity Net Gain (BNG) requirements, and BNG alone is not the right measure to use to make sure that greenbelt release is really delivering the nature recovery and ecosystem benefits that we need. It is challenging for boroughs to provide their own land for BNG credits, which over time is likely to lead to a net export of biodiversity offsets out of London. LWT believes identifying Wildbelts within London could address this.

Protection of Metropolitan Open Land (MOL, paragraph 2.11)

We welcome the approach to continue to protect MOL.

However, we dispute the assertion that golf courses "have limited biodiversity value", as many are important sites for wildlife. Indeed one of LWT's nature reserves is the "roughs" of a golf course that support rare butterflies, orchids, reptiles and glow-worms.

The priorities for MOL should be to improve biodiversity and make the space appropriately accessible. LWT are keen to connect people with nature, but we need to recognise that the value of some sites, including golf courses, is linked to their not being accessible - the impact of additional visitor pressure is one of the circumstances to be taken into consideration.

Further information

GiGL's SINC & PH stats, including accessibility

		% coverage of GB	Number of sites (some not *fully* within GB)		
Metropolitan SINCs		22.61%			88
Accessible SINCs		30.07%			228
All SINCs		41%			427
Priority Habs outside SINCs in GB (ha)	Ancient Woodland outside SINCs in GB	Non-priority woodland outside SINC in GB		Total	% PH outside SINCs
838.82	26.68	902.5		1768	5.08%

6.15% of GB is other accessible open spaces (outside of SINCs), so in total that's at least 36% of green spaces in GB accessible to the public.

These figures would increase with more up-to-date data.

FoI Q&A from an outer London borough.

LWT asked one outer London borough, with a significant area of green belt, that didn't have an ecologist or planners with ecological knowledge, about its preparedness for Biodiversity Net Gain (BNG). The borough replied, stating they have: "not commissioned any external consultancy advice on BNG in Planning applications."; "not drafted/adapted a policy to suit BNG"; "not issued any guidance on off-site gains; no "habitat bank of sites".

The Wildlife Trusts

Wildbelt

The Wildlife Trusts' policy briefing

Wildbelt: A designation for renewal

Nature is vital to us all – for the food we eat, the water we drink, the air we breathe, and the space we need to feel secure, happy, and healthy.

It is the best tool in our toolbox to mitigate and adapt to a changing climate and support communities and farmers to be resilient to extreme weather, such as flooding. Recent research has also demonstrated nature's importance to economic growth. Studies show damage to the environment is slowing UK growth, undermining prosperity, and could lead to an estimated 12% reduction in GDP. Protecting and recovering nature makes sense – and is critical to the delivery of the Government's five missions.

However, the UK is one of the most wildlife depleted counties in the world. One in six species in Great Britain is now at risk of extinction. Numbers of many species are in freefall and wildlife-rich habitats are fewer, smaller and less connected than they've ever been. The consequences of decade after decade of nature's decline are already playing out across the country, with significant impacts for our health, our ability to produce food, and our capacity to withstand floods, drought, and heat.

We know that the status quo for protected sites is not enough to achieve nature's recovery. England's collection of wildlife sites are too small and too isolated. To meet the Government's legally binding target to halt nature's decline by 2030, more space is needed for nature.

A new Wildbelt designation can ensure positive outcomes for nature's renewal through the planning system by delivering more natural infrastructure alongside one and a half million new homes and accelerated infrastructure delivery.

Achieving 30x30 on land

Currently on land in England, the only site designations which provide long-term protection from harm and require positive management for nature are Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, which cover 8.45% of England's land. Many of these are also not adequately supporting nature, with only 34.68% of SSSIs in good condition. In addition, Local Wildlife Sites often have the same nature value as legally designated sites but have no explicit long-term protection.

The UK Government have committed to meeting the international target to effectively conserve and manage 30% of the world's land, coastal and marine areas by 2030 (30x30). This is the biggest and boldest conservation commitment the world has ever seen, with more than 190 countries committed to achieving the global goal.

To help us achieve this target, we need to think more and bigger. Alongside stronger and more explicit planning protections for Local Wildlife Sites in the National Planning Policy Framework (NPPF), we need a new designation of land in England to support nature's recovery. One that goes beyond protecting the nature we have, to protecting the space nature needs for the future.

None of the conservation and landscape designations in England exist for this explicit purpose. The Site of Special Scientific Interest (SSSI) designation is critical for preserving those areas of land that have been identified as currently most important for wildlife. National Parks and National Landscapes are focused on protecting landscape value and natural beauty. They, along with Green Belt, do not directly consider biodiversity value.

We need a way of protecting sites that are being managed to create new habitats and to enable nature to recover, as it will be years or even decades before nature on these sites has recovered sufficiently for them to meet the strict criteria for current designated sites protection.

A new nature recovery designation – a Wildbelt – would be a robust and permanent designation to enable land that is currently of low or degraded biodiversity value to be protected for nature's recovery at small or large scale. It would in no way compete with existing designations, as in some circumstances it could overlay these, in the same way that National Landscapes, National Parks and SSSIs can overlay each other. This can create an opportunity for designations like Green Belt to contribute to nature's recovery and improve access to nature for the urban areas it surrounds, whilst helping the UK to meet environmental targets.

Putting people and nature at the heart of planning

Changes to the planning system can ensure a win-win for housebuilding and nature; urgently accelerating the delivery of new homes and infrastructure, whilst rapidly making more room for nature. The early decisions made by the Government will set the tone for changes to come and The Wildlife Trusts want to work in partnership to deliver positive change for people and nature.

A successful planning system is crucial to securing nature's recovery and creating communities with nature-rich green space on people's doorsteps. We believe a Wildbelt designation, alongside stronger protection for Local Wildlife Sites, could put nature's recovery at the heart of planning and take advantage of the win-wins for housebuilding and nature.

To deliver this, local habitat restoration targets should accompany local housing targets to ensure we are on track to meet 30x30 and legally binding Environment Act targets, which should be a purpose of planning in a revised NPPF, Town and Country Planning and other major infrastructure plans. National planning policy should then introduce the concept of Wildbelt and outline strong protections from development in the NPPF and encourage Local Planning Authorities, through local and neighbourhood planning, to identify and protect Wildbelt sites.

A Wildbelt would therefore support the planning system to meet environmental targets, help Local Planning Authorities implement their statutory biodiversity duties and support the delivery of habitat targets through Local Nature Recovery Strategies.

For years, The Wildlife Trusts have been working with landowners, farmers and developers, local communities and local authorities to establish new wild spaces and restore habitats. We've created some of the best areas for nature - providing millions of people with places to connect with nature, exercise and relax. Wildbelt would protect the significant public, charitable and private investment in nature restoration for the long-term.

The Wildbelt is a chance for a new designation to capture the public's imagination, inspiring and empowering communities to create new Wildbelt parks and green spaces through the Government's introduction of a new Community Right to Buy. The benefits would be wide reaching for people and for nature, contributing to improvements in wider society by enhancing nature's ability to prevent flooding and improve air quality, tackling the climate crisis, and creating more places for people to exercise and enjoy nature right on their doorstep. It would set a world leading example as the UK looks ahead to the next round of international conferences for nature and climate change this autumn.

Response to London Assembly Environment Committee's Call for Evidence on London's Environment - progress on priorities: Policies to restrict climate-harming advertising and sponsorship

Submitted by environmental campaign group Badvertising, January 2026

> "With a little will and imagination… we can deliver meaningful green policy" - Sadiq Khan, at the C40 World Mayor's Summit in Rio, November 2025.

In this submission we highlight progress in restricting high carbon advertising and sponsorship in London, barriers to further progress, and our experience as a London-based environmental group working to improve London's environment.

Background: High carbon advertising and sponsorship is currently common across London. On the tube network alone, passengers are surrounded by advertising encouraging flights, cruise holidays and private car use every day.

Such marketing is incompatible with environmental goals. It increases purchasing of polluting products and services,[1] maintains emissions-intensive social norms,[2] influences political decision makers[3] and undermines public support for climate policy.

Some progress has been made in London, supporting the city's environmental goals and progress towards a net zero carbon city.

- Hackney Council's Advertising and Sponsorship Policy now restricts advertising that "could promote goods or services that contradict the council's Climate Action Plan, for example by encouraging the use of fossil fuels" across advertising sites owned by Hackney Council.[4]
- Several flagship Museums and Institutions have ended partnerships with fossil fuel companies, including Tate Galleries, The National Gallery and Royal Shakespeare Company.[5]

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1 https://climatecitizens.org.uk/wp-content/uploads/2024/06/Lancaster-University.-Public-attitudes-to-management-of-advertising-for-high-carbon-products-and-services.pdf

2 https://www.fph.org.uk/media/mzekabgc/fph-low-carbon-advertising-and-sponsorship-policy.pdf

3 https://www.desmog.com/2024/07/02/revealed-hundreds-of-ad-campaigns-by-oil-and-gas-companies-have-appeared-on-london-public-transport-since-mayors-carbon-zero-pledge/

4 https://adfreecities.org.uk/2023/12/high-carbon-ad-restrictions-adblock-hackney-celebrate-council/

5 https://www.theartnewspaper.com/2025/02/28/british-museum-science-museum-under-increasing-pressure-to-scrap-bp-sponsorship-after-oil-giant-drops-climate-targets

Case study: Hackney Council

In 2023, Hackney Council voted to include restrictions on climate-harming advertising in its Advertising and Sponsorship Policy: "Advertising will not be accepted if, in Hackney Council's opinion, it is reasonably objectionable on the grounds that it could promote goods or services that contradict the council's Climate Action Plan, for example by encouraging the use of fossil fuels." The policy only covers ad sites owned by Hackney Council, however, restricting advertising sends a clear signal encouraging and supporting behavioural change in individuals, institutions and businesses.

Councillor Alistair Binnie-Lubbock, Hackney Council: "As a local Green Party councillor in Hackney, I have introduced a Low Carbon Advertising Policy to support the council's objectives for lower emissions and sustainable behaviour change. However, its impact is limited by the number of advertising sites owned by Hackney Council (approx. 12 billboards), since most advertising sites in our Borough and in London are owned and managed by TfL. For this policy to be joined up and impactful, we need a London-wide policy to restrict advertising for products and services that harm the climate, including through encouraging high-carbon lifestyles.

"A TfL ban on unhealthy food advertising has reduced preventable illnesses and supported the NHS. A Low Carbon Advertising Policy across TfL would help London to progress its environmental priorities to reduce air pollution and carbon emissions, support active travel and reach net zero. It would support the wealthiest in society to reduce emissions, and mitigate the impacts of climate change and air pollution which are worst felt (and least contributed to) by the least wealthy communities in London.

Since the Mayor set out his London Environment Strategy in 2018, TfL has hosted more than 240 advertising campaigns by oil and gas companies expanding their fossil fuel operations, including Shell, BP, and ExxonMobil.[6] Even more common are adverts for airlines, airports, and holidays abroad that encourage more flights, despite the Mayor's opposition to Heathrow expansion "because of the severe impact it will have on noise, air pollution and meeting our climate change targets." Private car and SUV adverts are still seen by millions across TfL's advertising network, despite the Mayor's welcome work to improve bus and tube services, implement ULEZ and promote active travel.

A TfL-wide Low Carbon Advertising Policy presents an opportunity for London to make significant progress on its environmental and energy priorities.

Barriers to progress

Sadiq Khan has cited practicality of implementation as a barrier to implementing a Low Carbon Advertising policy. We note that Vasttrafik, the Swedish transport authority for the

6 https://www.desmog.com/2024/07/02/revealed-hundreds-of-ad-campaigns-by-oil-and-gas-companies-have-appeared-on-london-public-transport-since-mayors-carbon-zero-pledge/

Gothenburg region which ended advertising for fossil fuels and fossil-fuel dependent products in January 2025,[7] has implemented that policy in the absence of formal definitions of high-carbon advertising. Legal advice supports TfL to similarly restrict polluting advertising.[8]

We recommend that the Environment Committee work with the Mayor to demonstrate leadership in this area and move to develop a revised Advertising and Sponsorship policy for TfL, including stronger restrictions on fossil fuels and fossil fuel-dependent products, based on current best-practise (notably Edinburgh,[9] Sheffield,[10] Vasttrafik[11], The Hague[12]).

Table: Selection of existing policies and laws implementing high carbon advertising controls at the municipal level

Municipality / location	Prohibited advertising and/or sponsorship	Policy applies to	Policy/Law document
The City of Edinburgh Council, UK Policy implemented: 2024 Applies to outdoor advertising contracts when up for renewal	Advertising and sponsorship for fossil fuel companies, airlines, airports, petrol, diesel and hybrid vehicles, all SUVs, cruises and weapons manufacturers.	(i) Advertising by third parties which would be installed on assets (including online) directly owned by the Council, or contracted, and (ii) third party sponsorship of Council events or initiatives.	Policy text: https://www.edinburgh.gov.uk/downloads/file/28994/advertising-and-sponsorship-policy See pp 8-9 for full list of restrictions and rationale.
Sheffield City Council, UK Policy implemented: 2024 Applies to outdoor advertising contracts when up for renewal	Advertising and sponsorship for fossil fuel companies, airlines, airports, petrol, diesel and hybrid vehicles. Also those for products determined to be harmful to health, including for unhealthy food and drink, gambling, alcohol and payday loans.	(i) Advertising by third parties which would be installed on assets (including online) directly owned by the Council, or contracted and (ii) third party sponsorship of Council events or initiatives.	Policy text: https://democracy.sheffield.gov.uk/documents/s66761/Appendix%201%20-%20Sheffield%20City%20Council%20Advertising%20and%20Sponsorship%20Policy%202024-2026.pdf See pp 3-5
Västtrafik public	Advertising for fossil fuels,	Advertising on all bus stops,	Policy text:

[7] https://www.badverts.org/latest/major-swedish-transport-operator-ends-fossil-fuel-advertising
[8] https://www.badverts.org/latest/tfl-lawfully-entitled-to-adopt-low-carbon-ad-policy-say-lawyers
[9] https://democracy.edinburgh.gov.uk/mgConvert2PDF.aspx?ID=70730
[10] https://advertising.sheffield.gov.uk/sites/default/files/4866601/2024-08/advertising_and_sponsorship_policy_2024_to_2026.pdf
[11] www.worldwithoutfossilads.org/listing/wider-region-of-gothenburg-bans-fossil-ads-on-public-transport/
[12] https://www.theguardian.com/world/2024/sep/13/the-hague-becomes-worlds-first-city-to-ban-fossil-fuel-related-ads

transport network, Gothenburg, Sweden Policy implemented: 2026	cars, boats, mopeds, airplanes (and other vehicles powered entirely or partially by fossil fuels), fossil fuel-powered products, air transport and charter travel where the advertiser only offers flights as transportation.	trams, buses and boats.	https://www.vasttrafik.se/om-vasttrafik/nyhetsarkiv/forbud-mot-fossil-reklam-i-kollektivtrafiken/
The Hague, Netherlands Public law policy implemented: January 2025.	Advertising that is clearly intended to promote the following products and/or services: fossil fuels, flying holidays, airline tickets, gas contracts, grey electricity contracts, cruises and/or vehicles with a fuel engine. This definition was tested in court and passed on the basis of EU legislation.	Publicly and privately funded advertising in public space or in places visible from a public space, also on stations and busses and the subway (whether the municipality has a contract with the advertising operator or not)	Policy text: https://denhaag.raadsinformatie.nl/document/14526338/1/20240912-RIS314661+Gewijzigd+initiatiefvoorstel+PvdD+Stunt+niet+met+het+klimaat?connection_type=17&connection_id=10946637
The Hague, Netherlands Private law policy implemented: January 2026 Applies to outdoor advertising contracts when up for renewal	Advertising by or for companies in the coal, oil and gas, and aviation sectors, and advertising about products and services related to fossil fuels, flying holidays, airline tickets, grey electricity contracts, gas contracts, cruises, or cars with fossil fuel or hybrid engines. *This also includes issue and image advertising and sponsorship by companies from the aforementioned sectors.'*	(i) Advertising by third parties which would be installed on assets (including online) directly owned by the Council, or contracted, and (ii) third party sponsorship of Council events or initiatives.	Policy text https://denhaag.raadsinformatie.nl/document/14542388/1?connection_type=16&connection_id=932571

Kevin Pope
Sutton Resident

Dear Committee,
I want to respond to this as a lay person with a keen interest in trying to voluntarily "green up" my neighbourhood in Sutton.

In short, I am not seeing any significant progress in protecting or enhancing green spaces; I am not seeing waste reduced where I live; I do not think London is remotely ready for climate change and especially increasing heat; I do not think that the environment is a priority for London councils and I do not think that London as a whole regards quality of life issues as more important to the well being of Londoners than say, economics and yielding to business interests.

I accept that London has a wide variety of habitats, parks, commons, waterways etc and that there are a wide spectrum of individuals and groups of people who try to maintain and improve these places. But on the whole, we are not seeing the transformative smaller projects that help to change public perceptions about where they live. For my part, for the last ten years, I have engaged with the local authority to find council managed sites (mostly neglected) where wildlife habitat can be created on a small scale. Often these are carparks or planters or any site that that can be utilised without any cost to the council. I provide the free labour, I grow the plants and I maintain the sites.

My successes are generally good but the biggest problem for me if not the general public, not vandalism or litter but the careless actions of council employees, often out sourced workers, who have not been informed or understood the value of my work. In Sutton, too much damage is down to people who should know better and it is extremely frustrating. For example, last weekend I spent trying locate newly planted plants on a roundabout that were growing well until the council decided to dump a truck load of wood chip all over them for the purposes of "weed control" burying them a foot deep. For me, woodchip is unacceptable compared to a thriving biodiverse planting scheme but in the world of local councils, wood chip and weed killer are part of the arsenal of weapons that they use to project the idea that they are doing something constructive instead of destructive. Councils including my own are good at planting trees but hopeless at sensitive maintenance. I love to see the trees but aftercare is a serious failing and I see so many trees dying from drought or even worse strimmed of their bark by careless employees. You have to ask why oversight, management and quality control of public spaces is so lacking. If I can see a rubbish job in my neighbourhood, why can't they ? These people are paid a great deal of money to deliver a better London environment but on the simplest details they fail miserably and it impacts the way we feel about that. Don't care breeds more don't care.
London is a city full of neglected abandoned corners that are not on private land. We should encourage communities to take and transform these areas so that they become fully visible and thriving parts of the community that inspire others to get involved and contribute to the greater good on all levels connected to environmental priorities.

Waste.

Recycling in Sutton is around 50% . In Europe its far higher but I believe that Europeans take a far more mature and civic minded attitude towards cleanliness, pride in where they live and quality of life. I went to Amsterdam last year. Spotless. No plastic bottles in the gutter, clean, green, charming. Come back to London and it is filthy. British people clearly do not mind living on dirty streets where they drop litter, fly tip, pave over front gardens and generally regard the world beyond their homes as dumping grounds. The authorities have a massive part to play in this from taxing plastic bottles to providing a sensible and modern recycling scheme.. The fact that waste dumping on private and public land has increased massively over the years shows us that environmental laws are not priority, weakly enforced and unfit for the challenges in the UK. The mindset for too many Londoners is irresponsible, expedient and often criminal. We do not see improvements because progress is piecemeal and often glacial.

Global Warming

I despair. International, national and local politicians are not taking this seriously and many still think climate change means nicer summers with ice cream rather than water shortages, droughts, dead rivers, crop failures, increased prices, people sweltering in poorly built new builds, hospitals overwhelmed, social unrest, climate refugees and city wide emergency measures.

London needs to stop building so many homes and offices are that are modernistic, ugly horrors, unfit for human habitation and that impact greatly on the mental and physical health of the people who live in them. We need an urgent return to a built urban environment that is in harmony with nature, built with aesthetics and beauty in mind and is built to last like the old buildings of the past that we love and admire today. Ask the Dutch or the French about this and why their cities are so liveable and London is not.

This is all I want to write although I could go on. There is a mental health crisis in London, I believe driven in part by the anxieties that are generated by living in a crowded, fast paced, expensive, crime plagued, unreliable city where nature and the built environment should be fused together to soften and calm the city and make it less intimidating, more inviting, more precious. I am not seeing this but the it is a big part of the answer to so many of the problems that Londoners and London wildlife faces.

Yours sincerely

Kevin Pope

London Assembly Environment Committee Call for Evidence January 2025

Submission from The Restart Project

1. What progress is London making on key environmental indicators?

London's repair group network: The Restart Project helps people run repair events in their communities where people teach each other how to fix their broken and slow devices. In 2025, the network in London has grown to include 52+ groups, supported by 156 new volunteers who've completed 958 volunteer shifts.

Over the year, groups held 444 repair events, welcoming 6,015 members of the public. Through these events, the London network has fixed approximately 4,237 powered and unpowered items a year, helping to avoid an estimated 7,415kg of waste and 74,356kg of CO2.

Restart is working with the network to understand who's visiting and volunteering at events, to ensure new audiences benefit from fixing events and skills development. We're trialing ways of gathering demographic data for visitors with 5 repair groups and plan to launch a volunteer survey. Results from a survey for repair group organisers highlighted low engagement from young people in repair events and we're hoping to support the network with engaging more young people.Through conversations and the survey, 27% of groups have expressed an interest in doing so.

We've partnered with repair groups to train 61 people at 9 How To Fix workshops, aimed at upskilling people in repair and recruiting new volunteers for the community. 79% have reported an increase in fixing confidence through these workshops.

We recently worked with Enfield Council to build a new community repair group in the borough, which hosted its first event in December. We're now aiming to build new community-led repair groups in areas of London with less repair activity, focusing on developing relationships and engaging communities in the boroughs of Bexley, Greenwich, Croydon and Bromley.

Fixing Factories (As outlined in the Possible submission): In 2022, The Restart Project and Possible set up London's first Fixing Factory: A permanent community repair hub helping local people fix broken electrical items rather than throw them away. In 2026, we now have three Fixing Factories across Haringey, Hackney and Camden, with two more being developed this year. The model has also been replicated in Northern Ireland. Fixing Factories run weekly workshops to teach people to fix broken items, offer free weekly drop-in community repair sessions and, with our team of 45+ volunteers, repair and donate or resell items diverted from the waste stream. In the past six months, Fixing Factories have conducted 320 item repairs, enabling local people to avoid 824kg of waste and save 10,000 kg of carbon emissions. We have also trained over 450 people in electronics repair, helping them gain valuable skills to reduce waste and gain work in the green economy. 24% of attendees at our free community repair sessions are unwaged, demonstrating that Fixing Factories help those on low incomes to

keep essential electrical items in use for longer. Over 50% of participants come to the area specifically to visit a Fixing Factory, showing Fixing Factories' roles in High Street regeneration.

North London Repair Voucher pilot: Funded by North London Waste Authority, the Restart Project and ReLondon launched the UK's first trial of a repair voucher scheme for electrical products in 2025. The North London Repair Voucher Scheme is a waste prevention and behaviour change programme that aims to trigger increased uptake of repair by providing residents a 50% discount on the cost of repairing their household electricals and electronics (up to £50). The scheme has been running since 1st April 2025, and will continue in its current form until March 2026.

Preliminary results suggest that vouchers are proving effective, and as of 30th November 2025 over 3166 people applied, 2,713 of which were eligible (i.e. lived within North London), and 836 vouchers were used to fix items at participating repair shops.

The scheme was delivered collaboratively and made possible with buy-in and participation from local authorities who disseminated public communications, while repair services were performed by 20 participating high street repair businesses.

Initial findings suggest that:

- **Cost is an effective point of intervention** - 66% of applicants noted that their motivation to participate in the scheme was to save money. An estimated £50,250 was made in savings from avoiding new purchases across all beneficiaries of the scheme to date.
- **Vouchers help to avoid waste** - 61% applicants reported that the voucher helped them to avoid throwing away or recycling their product, resulting in an estimated 510 electrical products saved from waste across the pilot scheme.
- **Vouchers encourage uptake of repair** - 85% of beneficiaries report that as a result of using the voucher, they are very likely to consider repair the next time something breaks, and 63% of respondents report that they plan to encourage others to repair. This will likely have local economic benefits as 76% of respondents note that they are also very likely to use the repair shop again, whereas 60% report that they plan on supporting local businesses more broadly as a result of participating in the scheme.
- **Vouchers help to change behaviours** - the scheme helps to trigger positive knock on effects, with 74% of survey respondents reporting that they see themselves as more environmentally friendly as a result, 49% reporting an increase in recycling, and 33% increasingly opting for reuse or repair rather than disposal.
- **Vouchers support a just transition to a circular economy** - the scheme has successfully supported target populations and products, with 63% of beneficiaries of the scheme falling below low income thresholds (<£40k/ annum).

Alongside the scheme, ReLondon and London Councils conducted a feasibility study for a London-wide repair voucher scheme. This, plus the evidence from the North London repair

voucher pilot means London is in a good position to deliver a repair voucher scheme across the city. Resourcing this should be a priority for the London Assembly.

2. What are the main barriers to progress, and what further action is needed – from the Mayor and other stakeholders?

A. Cost, availability and difficulty of repair for businesses & individuals

The Restart Project conducted a qualitative assessment of repair businesses in North London in Autumn 2025. From this and engagement with repair businesses as part of the North London Repair Voucher Scheme, a number of trends became apparent:

Lack of availability of repair options: Whilst repair of electrical products like phones and laptops is easy to find in London, other product categories are less well represented:

- Of 99 repair businesses located in Haringey, Hackney and Waltham Forest, only 33 offer repair of products like vacuum cleaners, lamps and audio equipment.
- We could find no shops offering repair of low value items like kettles and toasters. When asked, many businesses had the skills to repair these products, but due to the low cost of new items, customers are not willing to pay what it costs to repair these products.
- For this reason, repair cafes and community repair hubs like Fixing Factories play an essential role in London's repair ecosystem. Without these volunteer-run events, there would be no repair options for some electrical products.

Losing repair skills:

- General repair businesses tend to have been in operation for a long time, with business owners approaching retirement. Two of the general electrical repair businesses involved in the pilot either shut down or expressed plans to retire during the 9 months of the trial.
- A number of businesses were oversubscribed, with long waiting lists for their repair services, but expressed challenges in recruiting new repairers.

Without support for London's repair businesses, Londoners could lose access to high street repair services in the next decade or two.

When asked about the major challenges, businesses referred to structural issues, such as poor product design, and the difficulty of securing official spare parts affordably, or at all in some cases.

However other challenges like costs and recruitment could be addressed at a London level.

Therefore we urge the Mayor and others in London to take action to:

Support repair businesses and high street repair hubs as a matter of urgency, whilst we still have high street repair services. These actions could include:

- *Expanding the Repair Voucher Scheme across London*, to reduce repair costs for residents and increase support for businesses. The scheme should be run for at least two years to give businesses confidence and enable them to plan.
- *Reducing costs* for businesses, including business rate relief, working with central government to reduce VAT on repair and rent relief where possible.
- *Supporting training, accreditation and apprenticeships*, to attract and train a new generation of fixers in London.

Support community repair groups, who are providing the only option for repairing some types of electrical products. London Repair groups have fed back that support from local authorities is needed:

- Free space helps to reduce costs and increase the sustainability of the groups, increasing the chance that costs can be covered by visitor donations.
- Support is needed to collect 'waste' products that can be used in workshops to upskill volunteers in repair.
- Many groups would like to engage young people in their repair events. Support connecting them with key partners in the community who work with young people (schools, colleges, universities, scouts, girl guiding) can help get more young people into fixing.
- Promotion support can help to ensure more of the local population are able to benefit from repair cafes, and attract more volunteers
- Funding support can help groups to start up and continue running, including grants to support space hire, training, insurance and other logistical costs. Multiyear grants would provide more security.
- Support for community groups and organisations interested in scaling their repair initiatives into more permanent spaces like Fixing Factories. This can help to reduce the current gap in repair skills, and availability of repair options for smaller electricals.

B. Little incentive to keep reusable, discarded products in use

Reuse and repair are widely acknowledged as more efficient than recycling. But there are no binding requirements or incentives for manufacturers, or the public sector and their service providers to prioritise reuse. In fact, although recycling targets and the current Extended Producer Responsibility (EPR) requirements include reuse, they inadvertently dissuade manufacturers and local authorities from investing in redistributing reusable items.

In a study of small appliances taken to a West London Household Reuse and Recycling Centre in 2023, The Restart Project found that almost half of the electrical products sent to be shredded for recycling during the study could have remained in use if reuse and repair processes had been in place:

- 36% of all small electricals headed for recycling were still working.
- An additional 10% of items assessed only needed simple, low cost repairs.

These figures are consistent with previous research, e.g. a 2017 report estimated that over 45% of vacuum cleaners and 40% of laptops in household WEEE (waste electricals) were either fit for reuse, or required only minor repairs to be reused.

A further study by The Restart Project in 2024 investigated the reuse options that are offered in the UK's waste facilities. The research found that whilst there are more options for reuse in London's waste facilities than across the country, there is still a lot to be done: In London 31% of waste facilities offer no reuse facilities for any type of product (across the UK, half of waste facilities do not offer any reuse options), in London only 29% offer reuse of electrical products (18% across the UK). A survey conducted for the same report found that an overwhelming majority of the public (85%) feel that products in good condition should be kept in use through being repaired/refurbished (38%) or donated/sold (47%). However with no clear reuse targets or incentives for local and waste authorities, most waste facilities simply aren't providing an option to keep any products in use.

Therefore we urge the Mayor and others in London to take action to:

Introduce a London-wide reuse target. This is needed to drive the establishment of local infrastructure to keep products in use for longer, saving people money and using Londoners' resources more efficiently. This should include:

- A binding requirement to increase reuse in collaboration with local reuse and repair initiatives. This needs to be a separate target, prioritised over recycling.
- These targets should be complemented with targets for overall waste reduction.

Colliers Wood Friends of Parks and Green Spaces – response to London Assembly Call for Evidence on Progress on Environmental Priorities, Dec 2025 -Jan 2026.

1. **What progress is London making on key environmental indicators?**

Good to see the local Council (Merton) and their contractors responding to feedback in recent years for lower-impact and more thoughtful intervention in green spaces, aimed at biodiversity. For example, leaving dead trees in situ (including some fallen across a stream, which is benefiting wildlife), and instituting non-mow May, resulting in outcomes such as a much-enjoyed buttercup meadow in Wandle Park.
More street trees have been welcomed, and are being implemented in Merton (however, see below about barriers to establishing them).

2. **What are the main barriers to progress, and what further action is needed – from the Mayor and other stakeholders?**

Provide better access to water e.g. for local greening initiatives, wildlife planting and street trees. New planting must be watered to establish; for trees and larger shrubs, this would be for a full year or more. Lack of comfortable, convenient water access is a key barrier, as volunteers cannot carry water containers in the volume needed (it is particularly heavy, and the need is frequent).
Regarding street trees and watering: street planting should be funded over a three year period with a funded plan for watering to ensure that the trees can be established. This is needed so as not to waste the cost of the original installation of trees, and would provide better resilience to hotter summers in years to come.
Ordinary people regularly damage biodiversity and set us back on green spaces initiatives (e.g. littering, rough sleeping, children trampling planting), and in some cases are simply unaware of the impact – or think someone else is responsible or paid to sort it out. More action is needed to help people feel closer to their local green spaces, aware of their own impact, and more responsible about managing their daily activities, such as stopping littering. For litter, regular cleaning helps (as people copy what they see), but the frequency and volume is currently enormous in urban areas.

3. **What has been the experience of Londoners and London's environmental groups working to improve London's environment over the past decade? What lessons can be shared?**

Council staff are passionate and knowledgeable but can seem stretched, e.g. verbal offers of help/expertise but no reply to emails when ideas or initiatives are followed up. Communications in general can be hard work – hard to get replies on a variety of things. New or revitalised initiatives such as Merton in Bloom have been welcomed,

but were set up late with everything done in a rush, and communications either late or completely lacking.
Wandle oil spill in Feb 2025: longer term response has not been made clear. Were samples of water, silt and soil tested for toxicity at different points along the river? What were the outcomes? The Wandle is one of our vital and rare chalk streams - what are the future approaches planned to prevent such happening again?

4. **What further action is needed to achieve the Mayor's environmental goals for London?**

Require basic garden/horticulture training for council staff and contractors, including the most junior. Experience shows they can e.g. just mow things flat, and when challenged they point out they are just doing what they were told, with the tools provided. Better training and more nuanced and expert green space management is needed. They also need to litter-pick more effectively before clearing huge swathes of vegetation, so green waste is not full of tiny pieces of mowed-up plastics, which are even more difficult to later remove, and risk becoming deposited in the environment and ingested by wild creatures.
More and more targeted communication to attract and involve local communities and volunteers, and provide activities they want to take part in. For example: watering street trees could be made to look more official, and ways developed to give those doing so contact with each other, as that is often a key enjoyment of volunteering.

5. **Are there topics or issues which have been overlooked, which the Environment Committee should scrutinise in greater detail?**

More legislation against paving over your front garden as parking, as this impacts water run off and flooding, as well as damaging biodiversity. Where this already exists, require it to be replaced with permeable paving, and provide examples of how to do so including incorporating suitable planting.
Require green roofs of native but cheap, self-sustaining vegetation on all new flat roofs, as done in Basel, Switzerland. This not only protects biodiversity but reduces energy consumption of buildings. It is not intended to be a "garden" for human viewing, but rather a space to make the city greener and more climate resilient. https://thebimhub.com/files/membersarea/files/basel.pdf
Toxins from dog flea powders get into streams and rivers and kill wild insects and/or their larval forms. There are oral treatment alternatives, and these should be mandated if owners cannot stop their dogs from entering streams and other natural water bodies.
Phase out the use of glyphosate in all London Boroughs. Current approaches show short-term thinking, and work against other biodiversity initiatives, for example, our Friends of Parks & Green Spaces group received funding from the council and the Beekeepers Association to create a bee friendly bed in the Colliers Wood Recreation Ground where the contractors continue to spray glyphosate. Studies have shown (see Chapter 8 Silent Earth by Dave Goulson) that the use of the herbicide harms insects and bees by both reducing their habitat and by actually causing direct harm to them. It looks as if the harmful impact of the herbicide also reaches humans. Goulson mentions that in the USA people who have been routinely using glyphosate and have

developed non-hodgkins lymphoma are now suing the company that produces it, and winning.

Thank you for giving us the opportunity to comment,

Bryony Pollock on behalf of Colliers Wood Friends of Parks and Green Spaces, a sub group of Colliers Wood Residents Association

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Colliers Wood Residents Association - Friends of Parks and Green Spaces
cwraparksandgreenspaces@gmail.com
www.cwra.org.uk/greenspaces

CPRE London

Building out into Green Belt is the worst possible option for London. It is a lose-lose scenario. We lose our countryside and we create a high-carbon, car-dependent, unhealthy city.

We advocate instead for ‘compact, efficient cities’ with strong Green Belt protections, which are low-carbon, where people get around by public transport, walking and cycling and can live close to jobs and amenities, and where parks and green spaces are protected for health, recreation, sport and nature. We create compact cities by using land efficiently, recycling sites in need of regeneration, using space better and moving away from car-use which is space-inefficient and has other unwelcome impacts like air pollution and noise.

For more information, see:
https://www.cprelondon.org.uk/news/cashing-in-on-londons-parks-and-countryside/

Also we run the Front Gardens Network which is part of our 'Sponge City' work, adapting to more extreme weather and tackling river pollution:
https://www.cprelondon.org.uk/news/front-gardens-on-the-front-line/

We publish a London Boroughs Recycling Scorecard annually - which shows London to be the dustbin of England:
https://www.cprelondon.org.uk/news/london-recycling-scorecard-2025/

Written Evidence Submission

Submitted by: Dr Sayed Elhoushy

Queen Mary University of London

Call for Evidence: London's Environment – Progress on Priorities

Focus Area: **Waste and the Circular Economy**

January 2026

This submission draws on evidence from the Food Waste Pilot Project in Tower Hamlets, delivered in partnership with East London Garden Society. The findings reflect resident perspectives, observed behaviours, and community-level responses to food waste interventions in high-density urban settings.

Evidence of progress

Residents across housing types demonstrated a strong motivation to reduce food waste, driven by cost-of-living pressures, social and environmental concerns. Emerging technologies (e.g., smart composters and surplus food platforms) increased the visibility of food waste volumes, prompting discussion and reflection at both household and community levels. The findings indicate that visible, community-based interventions can support food waste reduction, particularly when participants receive feedback and opportunities to reflect on collective outcomes. Such outcomes can be facilitated through co-created, community-based initiatives supported by tools that enable progress to be tracked over time.

Barriers to progress

Structural conditions, particularly in flats and high-density housing reduce engagement in food waste interventions. Limited space, inconsistent infrastructure, and unclear food waste collection arrangements weaken the effectiveness of standardised approaches. The evidence also indicates that an overemphasis on composting can unintentionally undermine prevention efforts. When composting is framed as the primary solution, it may function as a moral licence, diverting attention from higher-impact behaviours such as purchasing decisions and leftover management.

Implications and lessons learned

Household food waste is best addressed as a system-level issue rather than primarily as an individual behaviour challenge. A London-wide strategy would be strengthened by:

- Prioritising waste prevention across the food journey, recognising that downstream responses alone may increase tolerance of waste.
- Supporting community-based initiatives that reflect housing realities and provide visible outcomes.
- Investing in technologies that improve food waste measurement, targeting, and learning across households and boroughs.

Supporting evidence

- Elhoushy, S. (2025). Reducing Household Food Waste: Why co-creating solutions with stakeholders is essential. Queen Mary Policy Hub, Queen Mary University of London. Available at: https://qmro.qmul.ac.uk/xmlui/handle/123456789/114174

- Elhoushy, S. (2024). Food Waste and Composting: Practices, Meanings, and Competencies (Food Waste Pilot Project Report No. 10239808). Queen Mary University of London. Available at: https://qmro.qmul.ac.uk/xmlui/handle/123456789/98553

Dr Abigail Whitehouse
MBChB, MRCPCH, PhD
Senior Clinical Lecturer

Queen Mary University of London
Medicine and Dentistry

Dear Committee,
I enclose the following submission for the call for evidence on environmental priorities. I co-lead the Barts Charity Children's Environmental Health Clinic serving children with asthma and other respiratory conditions in East London alongside Professor Jonathan Grigg. I am a Paediatric Respiratory Consultant and a clinical academic with a focus on environmental exposures on health.

London has made important progress on children's environmental health, but we continue to see both clinically and in research projects that very high exposure and deep inequalities remain, particularly for families in social housing in boroughs across London. The Environment Committee should use this model to scrutinise how far Mayoral policies are reaching the children at greatest risk, and what more is needed from the Mayor, boroughs, the NHS and housing providers.

Progress and case examples

- The Barts Children's Environmental Health Clinic, established in 2023 at the Royal London Hospital, provides integrated respiratory and environmental assessment for children aged 3–17, combining clinic review, structured home visits and personal exposure monitoring.
- To date, 77 children have been seen, almost three-quarters with asthma and almost 90 per cent with atopy, generating personalised exposure reports that families use to secure mould remediation and other home improvements from landlords and councils.
- London-wide measures such as the Ultra Low Emission Zone and the Mayor's new HEPA filter programme for at least 200 schools show how environmental policy can be targeted to children and high-deprivation areas.

Barriers and needed action

- Most clinic families live in council or housing association flats, with high rates of visible damp and mould, gas cooking and limited ventilation, yet they face long delays and inconsistent responses from housing providers even when clinical evidence is provided.
- There is no routine paediatric environmental health service in the UK - this clinic is unique in its set up; referrals currently depend on individual clinicians and short-term charitable funding.
- The Mayor and partners should:
    - Embed children's environmental health clinics within integrated care systems, with stable commissioning and links to housing enforcement.
    - Use Awaab's Law and related powers to create fast-track pathways for medically-verified damp and mould cases, with standardised use of clinical exposure reports as evidence.
    - Align GLA clean air and housing programmes with NHS-led "Asthma Friendly Homes" style initiatives, scaling successful pilots across boroughs.

Lessons from Londoners and groups

- Families consistently report that they are highly concerned about both air pollution and mould, but do not know which behaviours make the most difference or how to navigate complex housing systems.
- The clinic's mitigation plans, developed with PPI groups and partners such as Global Action Plan, show that simple, tailored advice (e.g. ventilation around gas cooking, reducing sprays, optimising routes to school) is acceptable and actionable when supported by trusted professionals. Collaboration between NHS teams, local authorities, housing providers and national campaigns (e.g. Clean Air Mayor coalition) demonstrates that families want, and respond to, integrated offers rather than fragmented projects.

Overlooked issues for scrutiny (250 words)
Indoor air quality in children's homes, especially damp and mould in social and private rented housing, remains a major but under-scrutinised driver of health inequality in London. Children in boroughs like Tower Hamlets already have measurably reduced lung capacity linked to outdoor air pollution; layering poorly ventilated, mould-affected homes onto this exposure further harms growth, asthma control and infection risk. Data from the Children's Environmental Health Clinic show that around three-quarters of children attend from council or housing association properties, with very high rates of parental concern about mould, gas cooking, smoking and inadequate ventilation, yet families report limited power to secure timely remediation.
This matters for London because children spend 80–90 per cent of their time indoors, and Awaab's Law and related reforms will only deliver health benefits if they are implemented robustly and informed by clinical evidence. The Mayor and boroughs could:

- Mandate and fund standardised, health-linked home environmental assessments for vulnerable children, delivered through NHS–local authority partnerships and linked directly to enforcement and decant decisions.
- Require housing providers to recognise medical needs within repairs and complaints processes, with clear timelines and accountability.
- Integrate indoor air quality (including damp and mould) into GLA clean air and housing strategies, setting measurable targets for reductions in children's exposure and tracking outcomes via paediatric services.

The Environment Committee should therefore scrutinise how indoor air, damp and mould are being addressed across GLA programmes and whether medically-vulnerable children are receiving priority protection.

Dr Abigail Whitehouse
MBChB, MRCPCH, PhD
Senior Clinical Lecturer

Centre for Genomics and Child Health
Blizard Institute
Faculty of Medicine and Dentistry
Queen Mary University of London
4 Newark Street, London E1 2AT

Amber Alferoff
London Learning &
Development Manager

Dear Scrutiny Committee,

I am writing with some evidence on London's Environment - **MD3384 Delivery Plan – Delivering a Greener, More Climate-Resilient London**

I have every confidence that people we work with regularly in London, especially Capital Growth/ Sustain will provide a wealth of useful evidence on the work that community growing is doing to meet this delivery.

I have three main points:

1) I want to bring to your attention the recent **Space to Grow report, based on research with community garden organisations** and developed by the Royal Horticultural Society in partnership with Social Farms & Gardens. This report focusses on realising the potential of the community gardening movement. https://www.rhs.org.uk/get-involved/community-gardening/spacetogrow
It has a set of recommendations for organisations supporting community gardening groups.

2) Peer-to-peer training (at a low cost for trainees and where community trainers are paid to develop courses) works very well and helps isolated community organisations build a resilient network, making it much easier to work together for London as a whole. We know this because Social Farms & Gardens run a training and networking programme for city farms and community gardens. We are 2 years into the latest 5 year programme, and are seeing good impact in terms of joined up thinking between these independent organisations on career development, volunteering, training, linking with businesses, physical and mental health and a greener London. Together these community organisations contribute significantly to:
2.3. Londoners can enjoy green and wild spaces across the capital; and London is resilient to extreme weather and the impacts of climate change. This reflects the importance of access to nature for Londoners' wellbeing; and the growing impacts of climate change on the health and safety of Londoners and our city.
2.4. The Delivering a Greener, More Climate-Resilient London programme will also make a substantive contribution to the London-level outcomes: Londoners live in neighbourhoods that are well-planned and designed; London is a world-leading global city; and Londoners live in a city that supports their mental and physical health.

The annual programme outcomes of Social Farms & Gardens London training and networking programme are:

- 6300 Londoners to increase involvement in their local city farms and community gardens, benefitting physical and mental wellbeing, career opportunities, and environmental skills.
- 600+ staff, volunteers and trustees to work in sync for shared outcomes for Londoners, partnering on community engagement, environmental and organisational development activities, professional development pathways, and on communicating impact.
- Senior leaders to raise the visibility of nature-based activities with the statutory, private and cultural sectors and the wider third sector.

Our last evaluation is here: https://drive.google.com/file/d/1Q4JD4kz7NVjSAu-4KekGK_45HdG6U1pQ/view?usp=sharing
This shows that a representative group of Londoners were involved with community growing and with our programme. However I would also like to add that:

3) There is a need for more support for access to leadership positions, trainer roles, and trustee roles in community gardens and city farms for Black, Asian and Minority Ethnic Londoners, and lower-income Londoners in order to meet GLA priorities, especially Addressing structural inequalities – (tackle the disproportionate impacts of climate change on disadvantaged, and underrepresented groups, and ensure green and blue places are accessible to and benefit all Londoners.).

Though our training is low cost (£20 a day or free to people on low incomes, and volunteers), and Black, Asian and Minority Ethnic Londoners are well represented as participants in our one day courses, anecdotally this group are more likely to be unable to attend multi-day career development training such as the 'Gardeniser' training due to having to prioritise paid, often freelance, work. They apply but then drop out due to finances. In addition the senior leaders (CEOs) and Trustees of city farms and community gardens are not representative of Black, Asian and Minority Ethnic Londoners, and lower-income Londoners. There's been effective work on this, for example at Myatts' Fields, and this needs to be amplified.

I'll finally add that the Green Roots programme has been very beneficial for London's city farms and community gardens.

Best wishes,

Amber

Amber Alferoff
London Learning & Development Manager

www.farmgarden.org.uk

Social Farms & Gardens

BAC BRITISH ACCREDITATION COUNCIL

Social Farms & Gardens is an accredited training provider with the British Accreditation Council

Environment Agency response to the London Assembly Environment Committee Call for Evidence: London's Environment – progress on priorities. Jan 2026.

Thank you for the opportunity to contribute to the Call for Evidence on Progress on Environmental Priorities.

It is the Environment Agency's role to ensure people, nature and businesses can prosper together by protecting and enhancing the environment while supporting the need for sustainable growth. Through our work in regulation, monitoring and direction of investment, I hope that you find the below useful in clarifying the picture of how London is progressing with environmental and growth ambitions.

Air quality and noise

Progress:

- The continued drive by the Mayor and others to improve air quality across the capital remains an objective that is broadly supported by the Environment Agency given the known benefits for human health and the wider environment.

- The Environment Agency has continued to regularly inspect and audit the large industrial sites we regulate to ensure that they are not significantly contributing to failures of UK air quality standards. We do this through the Environmental Permitting Regulations.
- In recent years auditing has been an extremely positive process working with the London Borough's, and we have moved resources across the organisation to ensure this remains the case.
- We also operate the national air quality monitoring Network on behalf of Defra. The data from this network is presented on the UK Air Website. The Defra network operates in partnership with the London Air Quality Monitoring Network and the Heathrow Air watch Network.

Concerns:

- Stand By Generators - There has been a proliferation of data centres across the South of England in recent years. From an air quality perspective, this comparatively clean technology should be encouraged but we have concerns around some elements of their operation.

- Stand-by generators offer redundancy in the case of a failure of the data centre electrical supply. To maintain a level of readiness, a comprehensive programme of routine testing is established. The running of the diesel generators causes emissions to air. These tests are not usually regulated by the Environment Agency under the Environmental Permitting Regulations. As a result, any efforts to incentivise the reduction of testing episodes and thereby the emissions to air, such as more resilient electrical supplies to more granular policy details such as restricting standby operations to cleaner burning gas turbines, rather than diesel would be welcomed.

- We are also seeing many waste management sites instal more waste sorting equipment which has significant electrical demands. We are aware of several cases where business have been forced to run on very large diesel generators as

the local electrical grid cannot meet the demand or there are significant delays in delivering upgrades. This is limiting waste recovery and creating avoidable emissions. A better system for managing such electrical demand for industry would support growth of this business, generate further employment and reduce emissions.

- The Environment Agency is responsible for issuing Environmental Permits to certain types of large industrial sites but also to waste management facilities as well. These sites must meet emission standards that are agreed nationally to ensure that the potential impacts are prevented or where that is not possible minimised. This process relies on the operators of permitted sites using the best available techniques or BAT. The current legal mechanism around these sites means that the Environment Agency must issue an Environmental Permit if these nationally consistent BAT standards are met. The Environment Agency does not decide upon the location or the technology employed by these types of these sites as this falls under the remit of the planning authorities.

Improving biodiversity and protecting and enhancing blue and green spaces

Progress:

- There is positive progress on reaching targets for green cover and trees in the London Environment Strategy (LES). This was driven by the London Urban Forestry Plan. LUFP review which fed into its update. The river restoration data and reporting covers the some of the positive impacts on green spaces.

- Green spaces are becoming more multi-functional, green- infrastructure assets are part of the programmes of work of the Mayors bodies, with TfL being a strong advocate of embedding adaptation infrastructure into business as usual.

- Clean and Healthy Waterway (CHW) – the programme of work to date has done a lot to bring together key players and form a coherent plan to improve London's waterways. The suite of actions is yet to be published, but drafts include positive signs of partnership working to deliver across sectors.

- Integrated Water Management Strategies (IWMS), in particular the Sub-regional IWMS have been a positive approach for understanding water related pressures that may be blocking development delivery. These strategies are being used to support development conversations and understanding of potential growth areas, and act as a single point of information for a number of sectors.

- Work on understanding pollution from roads continued, and general raised awareness of the issue in London might be related to GLA visibility of the issue through.

Concerns:

- CHW – the original ambition of the Mayors manifesto for 'swimmable rivers' may have scrutiny if this is not clearly described in the CHW action plan.
    - the target for 'X' amount of designated bathing waters in the capital has been removed during the plan's formation
    - there is no target to achieve 'X' number of WFD good ecology status, which is a standard measure throughout all of Europe

- Planning decisions have not always supported CHW ambitions. PDU Case Report , is an example where the Deputy Mayor's decision to allow discharge of a large development's surface water into foul lines, thus increasing risk of storm overflow discharges from the receiving sewage treatment works into the Thames.

Greenhouse gas emissions and reducing energy use.

Waste and the circular economy.

Progress:

- The London Plan target for landfill diversion is ambitious, and in terms of Local Authority Collected Waste the performance is good at 2.8% landfilled. However, this is heavily dependent upon the use of energy from waste, and the export of waste as a fuel by West London and East London, the latter being exported for treatment abroad.
- Re -London has been working with the London Boroughs on increasing the efficiency of waste collections, which has resulted in minor improvements locally.

Concerns:

- The London Plan and the London Environment Strategy have set London a number of ambitious targets, that largely exceed the targets set at a national level.
    - Recycling (%) - 65% municipal by 2030
    - Landfill (% of municipal) - 0% biodegradable/recyclable to landfill by 2026
    - Residual waste / self-sufficiency - 100% managed within London by 2026
- The GLA is not a waste disposal or waste planning authority and has limited powers to call in waste management contracts if they are not aligned with the London Plan.

- London Net Self Sufficiency Target: Net Self-sufficiency by 2026, is not feasible. Data from the 2024 waste data interrogator indicates that currently the percentage that London is net self-sufficient for waste treatment is:
    - 62% for all wastes (Household, industrial, commercial; inert; hazardous)
    - 76% for household industrial and commercial only.

- Currently the best options for this target would be to retain it as an aspiration with fixed target date, or to reframe it with a new target date.

- Landfill Target: Zero biodegradable/recyclable waste to landfill by 2026 - London still sends 1.2m tonnes of non-hazardous waste to landfill, mostly from the private sector where GLA has limited control.

- It is estimated that 7% of London's waste going to landfill is biodegradable. The zero target is not achievable by the 2026 deadline if this is applied to all wastes, and it exceeds the national target significantly.

- Regarding Recycling Rates - Household recycling in London stands at around 33%, the lowest among English regions, unchanged in recent years. Re London have stated that achieving the 65% municipal recycling target requires household recycling to reach 50% and non-household recycling 75% by 2030.

- The main mechanism for improving recycling performance is through national policies, and currently a suite of policies that encompass the government's circular economy are being enacted. These include: extended producer responsibility for packaging materials; a deposit return scheme nationally for plastic and glass bottles; the introduction of 'simpler recycling' for the collection of household and commercial wastes.

- These measures have been projected to increase recycling nationally to meet the government targets. It is unlikely that London will be able to meet the targets even with the introduction of these measures due to the difficulties associated with London's housing stock being mainly flatted properties and the poverty experienced by some areas of London.

Adapting London to the impacts of climate change

Progress:

- Riverside Strategies - The Thames Estuary 2100 Plan introduces the riverside strategy approach. This approach integrates upgrades to flood defences with riverside improvements and wider benefits. GLA have supported this ambition to better protect London through well designed riverside development.

- SuDS and Streetworks – The GLA is working with Thames Water, the Environment Agency and Local Authorities on a world-first market-based approach to incentivise utility companies installing sustainable drainage systems. It supports ambitions to deliver at scale and at pace.

- Surface Water Strategy and the Flood Ready London partnership is a strong step forward in delivering a coherent plan of action for London. The partnership is formed of the Environment Agency, London Councils, London Fire Brigade, Mayor of London, Thames Water and Transport for London with support from Thames Regional Flood and Coastal Committee.

- The London Surface Water Strategy (LSWS) was released in May 2025 by Flood Ready London, the partnership of six organisations (the Environment Agency, Greater London Authority, London Councils, London Fire Brigade, Thames Water and Transport for London), plus the Thames Regional Flood and Coastal Committee with flood risk management roles and responsibilities. This followed from the various roundtables and investigatory reports undertaken following the Summer 2021 flooding in London.

- Over £3m of funding has been secured to commence the LSWS's programme and the first two (of ten) Surface Water Catchment Partnerships are working on a collaborative Surface Water Catchment Action Plan which prioritises blue green infrastructure and other SuDS features to improve the environment, the resilience of people and infrastructure across London through a catchment-based approach.

- The London Plan – It's positive that the London Plan requires that all sources of flood risk are managed sustainably and cost effectively, in collaboration with the Environment Agency, LLFAs, developers and infrastructure providers (links to the capital programme interface).

- The London Plan encourages natural flood management methods within development proposals because of their multiple benefits. This aligns in

spirit with the Thames RFCC NFM Programme's successes, but the London Plan reference is specifically about planning/development-led delivery, not RFCC-funded schemes.

- RFRA (Regional Flood Risk Appraisal) is led by GLA; Environment Agency is supporting with data and collaboration.

- GLA support for Thames Estuary 2100 - The GLA has supported delivery of the Thames Estuary 2100. The GLA attended several workshops with the Environment Agency to help shape and agree the updated Thames Estuary 2100 Plan, released following the 10-year review of the Plan.

Concerns:

- **Funding of infrastructure** – There are gaps in the Funding of major flood risk infrastructure that protects London.

- **TE2100 integration**: Recommendations from Thames Estuary 2100 should be embedded in planning decisions;

- **London Climate Resilience Review -** While it is good that the GLA are supporting the recommendations of the London Climate Resilience Review, there is still some clarity required on whether the GLA are maintaining an overview of delivery of all the recommendations within the review, specifically those not sat with the GLA to deliver. It would also be useful to understand in this report how the GLA plan to spend the £1m/year over the next three years and which recommendations this investment will support

- **Tidal flood risk from the Thames -** there are several outcomes within the TE2100 plan that the GLA are named to lead on or work with others deliver, and there is no update included in this report on how they are progressing with these.

- **Progressing climate resilience** – TE2100 Plan Outcome 8 actions ensure the Thames Estuary 2100 plan recommendations are embedded within the London Plan. The current London Plan does have TE2100 plan recommendations within it and the GLA are continuing to work with the EA to ensure the new recommendations of the Thames Estuary 2100 Plan, following the 10-year review, are included in the next London Plan.

Specific TE2100 Outcomes for reference to progress and concerns:

The Thames Estuary 2100 Plan outcomes that specifically mention the GLA are:
Outcome 3. Creating a better riverside for local communities
3.1 By 2030, councils, the Greater London Authority and the Port of London Authority will have worked with communities to co-develop visions for adapting riversides to sea level rise. These should incorporate the minimum requirements of the riverside strategy approach, deliver social, environmental and economic benefits, and promote continuation of the Thames Path.

Outcome 7. Increasing resilience to flood risk

7.1 Organisations will work together to increase resilience to flooding. They will use innovative ways to ensure those who live, work and visit the estuary are aware of flood risk and can adapt, respond and recover from flooding. Organisations involved include:

- Thames Estuary Growth Board
- Thames 21
- Greater London Authority
- Environment Agency
- Thames Estuary Partnership

Outcome 8. Ensuring development is resilient to climate change.
8.2 The Greater London Authority (GLA), Port of London Authority (PLA) and Thames Estuary Growth Board (TEGB) will ensure that the requirements of the Thames Estuary 2100 Plan are embedded in the:

- London Plan and supporting strategies (GLA)
- Thames Vision 2050 (PLA)
- Green Blue Workplan (TEGB)

This will ensure that future development of the riverside is sustainable and supports increased river use.

Outcome 9. Improving biodiversity
9.1 All partners will contribute to delivering biodiversity and environmental net gain, whilst minimising adverse environmental impacts from riverside development. Improvements should be made working with the Nature Recovery Network.

Outcome 10. Working towards net zero
10.2 All Thames Estuary 2100 partners will adopt a circular economy approach by:

- improving resource efficiency
- minimising emissions and waste

This will provide cost efficiencies whilst improving air, land and water quality.

Outcome 13. Funding multiple benefits through investment
13.4 Infrastructure providers, businesses and others who benefit from this Plan should contribute to the delivery of multiple benefits, either financially or otherwise.

Enabling activity 2: working collaboratively
E2.2 Partners will play a role in identifying and supporting engagement opportunities to enable delivery of this Plan’s outcomes. Specific roles will be identified through the outcome delivery plans.
E2.3 Partners will work collaboratively to deliver this Plan, to improve efficiency and effectiveness of resources.

Enabling activity 3: Developing skills and securing resources
E3.2 Delivery partners (those named in the outcomes) will ensure that skills and capabilities exist within their organisation to deliver their outcomes. They should ensure that knowledge is maintained through staff turnover.

Other Concerns:

The absence of water in London reporting - Given its vital role for supporting Londoner's lives, we would expect to see the GLA performance and Environment progress reporting strongly report on Water infrastructure, resources and quality.

- **Leakage** – TW performance is behind target for leakage. The Mayor continues to highlight Thames Water leakage as "unacceptable"; the EA are monitoring compliance through WINEP targets.

- **Pollution** – We appreciate the voice that the Mayor has given to criticise TW on the ongoing pollution. Rated one out of four stars in the Environment Agency's 2024 Environmental Performance Assessment, predominantly due to serious pollution performance and recognition that they were unable to deliver all of WINEP7 in AMP7 (Asset Management Period 7).

- Thames Water have again missed their Sewer Flooding target. The GLA have been active in supporting awareness raising for those living in Basements.

- Thames Water Company performance on incidents has not been good, we would like to see the Mayor further expect Thames Water to improve its performance in London. The Mayor has been pushing Thames Water and partnering on programmes of work, but more needs to be done. However, the Mayor has no formal powers to set water bills nor powers on how water companies spend their income.

Progress:

- The Mayor's teams (Infrastructure and Climate adaptation) seem to be engaging with Thames water on various programmes of work. GLA have worked with TW on a SuDS market mechanism which EA has supported, drinking fountains installations, and clean and Healthy Waterways.

- The Mayor has also convened roundtables to discuss how to progress the improvement of the water environment in London, with key stakeholders including Thames Water.

- The GLA and Thames Water have ambitious targets for putting surface water back into the water supply by removing impermeable areas in London. The Mayor's teams have been working in support of this.

- The Mayor's recognition of the need for major resource development for water supply in London is welcomed. The EA are active consultants in the proposed Thames Water schemes in Oxfordshire and Teddington.

Regards

Charlie Wood
London Area Director, Environment Agency

London Assembly Environment Committee: Call for evidence

January 2026

About Clean Air Fund

Clean Air Fund is a global philanthropic organisation working with governments, funders, businesses and campaigners to create a future where everyone breathes clean air. As the world's largest philanthropically-funded organisation dedicated to tackling air pollution, we drive ambitious change from grassroots to governments. We accelerate the clean air movement by:

- Funding and partnering with organisations across the globe that promote data and evidence, build public demand for clean air and drive action.
- Engaging and supporting decision makers to act on clean air, and bringing together funders, researchers, policy makers, businesses and campaigners to strengthen the air quality cause.

Our work in London includes:

- Supporting Breathe London via our collaboration with the Greater London Authority and Bloomberg Philanthropies. Breathe London plays crucial role in helping local communities, schools, hospitals and Londoners understand air pollution, engage with decision makers and take action to reduce their exposure. London has led the way and set the example that 14 cities across the world now follow via the Breathe Cities initiative.
- Supporting the London Healthy Air Coalition, which brings together a group of environmental, transport and health NGOs to advocate cleaner air in the capital.
- Partnering with grassroots organisations like Mums for Lungs on initiatives such as the rollout of School Streets across London.

Progress made on air pollution

Air pollution remains a major threat to public health, the economy, and the UK's environmental ambitions. A recent report from the Royal College of Physicians' estimates that air pollution will contribute to 30,000 UK deaths in 2025, with economic costs exceeding £27 billion annually[1]. It also undermines efforts to reduce carbon emissions and build climate resilience.

The GLA and the Mayor deserve credit for their efforts to improve air quality in London. These have undoubtedly contributed to London being within its legal limit for nitrogen dioxide (NO2), as announced in September 2025[2] when NO2 levels across monitored areas met the 40 micrograms per cubic metre (µg/m³) annual average for the first time.

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[1] https://www.rcp.ac.uk/policy-and-campaigns/policy-documents/a-breath-of-fresh-air-responding-to-the-health-challenges-of-modern-air-pollution/

[2] https://www.london.gov.uk/london-meets-legal-limits-toxic-no2-pollution-first-time-almost-200-years-earlier-predicted

Several welcome initiatives have contributed to improvements in London's air quality, including:

- The expansion of the Ultra Low Emission Zone (ULEZ) to all London boroughs from August 2023.
- Supporting the transition away from internal combustion engine (ICE) taxis through various policies and initiatives, including mandating that all newly licensed taxis are zero emission, TfL grants to help drivers make the switch, and expanding London's EV charging infrastructure.
- Transitioning to a fully zero emission bus fleet by 2030.

Work to be done

While London appears to be performing well against current national fine particulate matter (PM2.5) and NO_2 limits, the consensus across the clean air field and health professionals is that these standards are not sufficient to protect the public's health and are out of step with those adopted across Europe. As acknowledged in the Mayor's 'Cleaning London's Air – Delivery Plan'[3], pollutant levels in London significantly exceed the World Health Organization's (WHO) health based guidelines of 10 µg/m³ for NO2 and 5 µg/m³ for PM2.5.

It is essential that further action is taken, particularly across transport, to achieve the targets set out in the Mayor's Transport Strategy (2018), heating, and domestic woodburning. Current action on domestic woodburning does not reflect its significant contribution to pollution in London (forecast to be 17% of PM2.5 emissions in 2025[4]).

We recommend that the Committee probes the following key areas:

- The opportunity for London to commit to achieving interim WHO-guidelines for NO_2 by 2030, bringing commitments on NO_2 in line with a) the existing commitment on PM2.5, and b) the EU's air quality standards.
- The lack of action to address domestic woodburning in London, including through the failure to enforce Smoke Control Areas by boroughs. This is an issue of social justice, given that the vast majority (92%[5]) of people who burn wood domestically have alternative sources of heat in their homes, and the high concentration of wood burners in affluent urban areas[6].
- The need for specific action to accelerate the transition from diesel-powered LGVs (vans), given diesel vans are now the biggest road source of NOx emissions in central London.
- The action the Mayor is taking to support the transition away from gas boilers to cleaner forms of heating including heat pumps and district heating networks, given that a recent study indicated gas boilers account for c.70% of NOx emissions in central London[7].

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[3] *https://www.london.gov.uk/who-we-are/governance-and-spending/promoting-good-governance/decision-making/decisions/md3400-delivery-plan-cleaning-londons-air*

[4] *https://data.london.gov.uk/download/2lg5g/2s4/LAEI%202022%20Summary%20Note%20December%202025.pdf*

[5] *policy_pathway_to_reduce_air_pollution_by_phasing_out_domestic_burning_by_2030.pdf*

[6] *High-resolution mapping of residential wood burning heat sources using Energy Performance Certificates: A case study of England and Wales - ScienceDirect*

[7] *Evidence of Heating-Dominated Urban NOx Emissions | Environmental Science & Technology*

Healthy Air Coalition

London Assembly Environment Committee: Call for evidence

January 2026

About the London Healthy Air Coalition

London HAC is a regional group of the national Healthy Air Coalition - a collective of leading health & environmental organisations, with the shared vision of a UK free from toxic air.

We believe that everyone in London has the right to breathe safe, clean air, no matter who they are or where they live. Improving our air is a matter of social justice, because air pollution disproportionately affects people with existing health conditions, poorer and racially minoritised communities, and the oldest and youngest in society. The people most impacted by the issues must be properly involved in designing local solutions.

Over the last two years we've grown to encompass nearly thirty organisations, from multinational foundations to community groups, working on issues including health inequalities, climate change, social justice, transport and more. You can see a list of our members here.

What progress has been made?

Air pollution is considered the largest environmental risk to health in the UK[1]. Impressive progress has been made, including through the introduction and expansion of the ULEZ scheme[2], and London reached a milestone in 2025 when it was declared by Defra to have reached the UK's legal limits for air pollution[3].

This is positive, but reaching the UK's legal limits is a stepping stone, not an end goal. This is because the UK's legal limits are significantly out of date[4,5]; and because exceedances are still being recorded at monitors around the city[6]. Toxic air continues to impact the lives of thousands of Londoners every year[7]. Meanwhile, we are deeply concerned by public messaging which suggests[8] that the Mayor has finished cleaning up London's toxic air. This is far from the case.

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[1] House of Commons Library, Air quality: policies, proposals and concerns (2025)
[2] Greater London Authority, London-Wide Ultra Low Emission Zone, One Year Report (2025)
[3] Mayor of London, 'London meets legal limits for toxic NO2 pollution for the first time – almost 200 years earlier than predicted – following the Mayor's world leading air pollution policies' (2025)
[4] Ella Roberta Foundation, Prevention of Future Deaths Report: Coroner's Recommendations (2021)
[5] The World Health Organization slashed its limits for air pollutants in 2021
[6] Mayor of London, Freedom of Information Disclosure Log, EIR - Local Air Quality Management reports (2026)
[7] Mums for Lungs, 120,000 children admitted to hospital or taken to A&E in London last year with serious breathing problems (2025)
[8] Mayor of London, post on X reading 'We've cleaned up London's air - now it's time for our rivers' (2025)

What further action is needed?

As a coalition, the London HAC calls for action on three key areas. These are:

1. **The formal adoption of air pollution targets which align with World Health Organization guidelines, and a credible delivery plan to meet them,** as soon as possible. This includes complying with the WHO's interim targets by 2030. We note that the World Health Organization applies the same limits for most common pollutants for indoor air and outdoor air.

2. **Major action on traffic and transport**, to tackle a leading source of pollution. This includes achieving the existing targets in the Mayor's Transport Strategy (2018) and Net Zero Carbon Pathway; bold action to get diesel off our streets; and coordinating holistic strategies for London's river crossings and central areas that prioritise air quality and sustainable transport.

3. **Cleaning up heating, homes and workplaces,** to protect Londoners at home and at work. This includes taking action to discourage unnecessary domestic wood burning, support a transition to cleaner appliances, and strengthen indoor air quality protections, e.g. through advising employers to conduct air quality risk assessments in conjunction with workforces and recognised trade unions.

Looking at the London Environment Strategy, what could the Environment Committee scrutinise in more detail?

1. **Traffic and transport: why hasn't there been more progress on key targets, including mode shift and traffic reduction?**

The London Environment Strategy states that one of the **best ways to tackle PM2.5 and PM10 will be to achieve mode shift to walking, cycling and public transport**. There have been some positive expansions to public transport and a welcome rise in cycling in the last decade, while ULEZ has been successful in getting some of the most polluting vehicles off our roads. However, despite transport remaining the largest category of nitrogen dioxide and PM2.5, there has been essentially no progress on mode shift since 2016[9]. There has been little or no progress on several other key indicators set out in the Mayor's Transport Strategy, including bus speeds and physical activity levels[10].

Similarly, analysis conducted for the Mayor's Net Zero Carbon Pathway[11] in 2022 finds that a 27% reduction in car kilometres will be required to meet Net Zero. However, traffic appears to have been rising steadily since 2020, going in the wrong direction to meet this target[12].

[9] Clean Cities, Progress in meeting London's transport targets (2025)
[10] Clean Cities, Progress in meeting London's transport targets (2025)
[11] Mayor of London, Pathways to Net Zero Carbon by 2030 (2022)
[12] Clean Cities, Progress in meeting London's transport targets (2025)

The Mayor confirmed in a June 2025 scrutiny session[13] that he remained committed to the 27% traffic reduction target, which is welcome - but he also admitted that London was not on track to meet it. Given that this target appears very stretching, and that there are less than five years remaining to achieve it, we'd like to see the Mayor clarify what mechanisms will be pursued, in the absence of road user charging[14].

2. **Getting diesel off our streets: how can the Mayor accelerate the transition away from diesel, with particular attention to vans[15]?**

The London Environment Strategy says that **a comprehensive approach to phase out diesel** will be required. This will benefit Londoners' health by removing the source of some of the most damaging pollution; and prompt further gains through mode shift and electrification. Policies and support packages to transition high-mileage fleets away from diesel - such as London's buses and taxis - have so far been effective, leading to projections that London will be the first city to go diesel-free[16].

Diesel vans are now the biggest road source of NOx emissions in central London; and electrification of vans has been particularly slow, as evidenced by use of the ULEZ scrappage scheme, under which only 2% of non-compliant vans were replaced with an electric model[17]. Policies to tackle emissions from vans, now the leading source of nitrogen dioxide in central London, will be key to achieving air quality goals. We'd like to see continued focus on high mileage fleets, and supporting those who currently rely on diesel vans, to electrify as soon as possible.

3. **Wood burning: why hasn't more been done to tackle this source of PM2.5?**

The London Environment Strategy acknowledges that wood burning must be addressed to bring down PM2.5 and PM10 emissions[18]. Similarly, nearly a decade ago, the Mayor committed to achieving a target for PM2.5 under the 'Breathe Life' campaign, and acknowledged that wood burning would be required to achieve this.

As far as we are aware, there has been little meaningful action on these commitments. The latest LAIE release[19] found that 15.4% of PM2.5 emissions and 6.4% of PM10 emissions originate from wood burning, making it the largest single source of PM2.5 in the capital.

Around 90% of those who burn wood at home have another source of heating, suggesting that they do not need to burn wood to keep warm, with only 10% burning out of necessity. The Royal College of Paediatrics and Child Health has called for a phase-out of domestic wood burning in urban areas to protect children's health[20]. In London, we are calling for a large-scale public awareness campaign to

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[13] Mayor of London, Mayor admits traffic reduction in London is not on target (2025)
[14] Mayor of London, 'London Net Zero 2030: An Updated Pathway' (2022) *"The scale of reductions required – a 27 per cent reduction in vehicle kilometres according to the 'Accelerated Green' scenario – is only possible with some form of road user charging. Such a system could abolish all existing road user charges – such as the Congestion Charge and ULEZ - and replace them with a simple and fair scheme where drivers pay per mile, with different rates depending on how polluting vehicles are, the level of congestion in the area and access to public transport. Subject to consultation, it is likely there would be exemptions and discounts for those on low incomes and with disabilities, as well as consideration around support for charities and small businesses."*
[15] Clean Cities, 'Vans now number one road source of dirty air in central London' (2025)
[16] Guardian, 'Battery electric cars will overtake diesels in Great Britain by 2030, analysis suggests' (2026)
[17] Clean Cities, Mayor's £100 million ULEZ scrappage scheme fails to fuel electric van surge (2024)
[18] Mayor of London, London Environment Strategy (2018) pg 57
[19] Impact on Urban Health, 'What the latest data reveals about air pollution' (2025)
[20] The Royal College of Paediatrics and Child Health, Air pollution in the UK: position statement (2024)

discourage wood burning.

4. **Occupational exposure: how can the Mayor do more to protect people at work?**

The London Environment Strategy makes little mention of those exposed to air pollution through their work. 'Reducing non-residential emissions' is one of the 14 strategic programmes in the MD3844 delivery plan - we note that this delivery plan is yet to be published, and we would like confirmation that this will include occupational exposure and a date for publication. TUCAN (Trade Union Clean Air Network) made detailed comments on the failure to acknowledge the occupational nature of air pollution in their submission to the Clean Air Delivery Plan[21].

We welcome the commitment to include air pollution in the Mayor's Good Work Standard. The Standard currently requires that: "[t]he organisation has considered climate adaptations and measures for their workplace to remain healthy and safe workplaces during extreme weather, extreme heat and to respond to the impacts of climate change on workers." We now need to see wording that will extend this duty to air pollution, and a date for its adoption.

Toxic air remains a cross-cutting priority that intersects with all key themes in the London Environment Strategy

Tackling toxic air doesn't just stand to benefit human health and reduce health inequalities. In many cases, action on toxic air also means action on carbon emissions and climate resilience. This is because air pollution and carbon emissions often share common sources, like the use of fossil fuels and biomass in home heating, transport, and industry. Similarly, action to clean up the air can strengthen climate resilience, lead to more urban greening, and encourage more sustainable treatment or prevention of waste.

For these reasons, the Environment Committee should not see toxic air as a standalone issue that sits under its 'Air quality and noise' theme, but a cross-cutting one that interacts with almost all other relevant topics, from greenhouse gases and climate adaptation to treatment of waste and enhancing green spaces.

Some examples of this are:

- High levels of car use produce air pollution and carbon emissions, as well as increasing urban heat stress during London's increasingly frequent extreme heat days.[22] Supporting mode shift away from private car ownership and use will tackle the single biggest source of nitrogen dioxide, cut transport emissions, and enable climate adaptation by freeing up kerbside space for street trees and SUDs.

- Waste incineration is now the UK's dirtiest form of power generation for greenhouse gas production[23] and a major source of toxic air pollution - one which impacts more deprived communities and people of colour the most[24].

[21] TUCAN, Comments on the Mayor of London's Clean Air Delivery Plan (2025)
[22] PreventionWeb, 'How traffic increases urban heat stress' (2024)
[23] BBC, 'Burning rubbish now UK's dirtiest form of power' (2024)
[24] ClientEarth, 'What are the environmental impacts of waste incineration?' (2021)

- While tackling air pollution at source should be prioritised, more green space and canopy cover in urban environments improves resilience to extreme weather[25], as well as helping to absorb carbon, noise, and air pollutants[26].

[25] Trees for Cities, 'How urban trees turn down the heat' (2025)
[26] Woodland Trust, 'Tackling air pollution with trees' (2021)

Appendix 1)

Where does London stand on air quality commitments and World Health Organization guidelines?

This appendix sets out the differences between UK legal limits, WHO interim targets, and WHO 'full' guidelines; commitments made by the mayor; and London HAC's position.

What are WHO interim, WHO full and UK legal guidelines/limits?

Pollutant	WHO Guidelines (2021, "full" guidelines, "lowest risk")	WHO Interim targets ("IT-4", "lower risk" for PM2.5 and PM10; "IT-3" for nitrogen dioxide; "IT-2" for ozone and sulphur dioxide; "IT-1" for carbon monoxide). *N.B. WHO publishes 4 interim targets of increasing stringency (IT-1,2,3,4)* AND EU Ambient Air Quality Directive (2024) which EU members are to comply with by 2030	UK legal air quality limits - major pollutants under Air Quality Standards Regulations 2010
PM2.5 (particulate matter 2.5 micrometres or less in diameter)	5 µg/m³ (annual mean)	10 µg/m³ (annual mean)	20 µg/m³ (annual mean)
PM10 (particulate matter 10 micrometres or less in diameter)	15 µg/m³ (annual mean)	20 µg/m³ (annual mean)	40 µg/m³ (annual mean)
NO_2 (nitrogen dioxide)	10 µg/m³ (annual mean)	20 µg/m³ (annual mean)	40 µg/m³ (annual mean)
O_3 (ozone)	60 µg/m³ (peak season average: 8hr daily maximum over 6 months)	70 µg/m³ (peak season average: 8hr daily maximum over 6 months)	120/m³ (max. Daily 8-hour mean)
SO_2 (sulphur dioxide)	40 µg/m³ (24 hour mean)	50 µg/m³ (24 hour mean)	125/m³ (24-hour mean)
CO (carbon monoxide)	4 µg/m³ (24 hour mean)	7 µg/m³ (24 hour mean)	10/m³ (max. 8-hour mean)

What is London HAC's position?

- That the Mayor should formally adopt full WHO guidelines (2021) and publish a credible delivery plan for meeting these "lowest risk" limits as soon as possible;
- That the Mayor should meet WHO's interim targets for PM2.5 and nitrogen dioxide by 2030, matching the ambition of the EU Ambient Air Quality Directive. Interim targets by 2030 are a stepping stone to full compliance with WHO's "lowest risk" 2021 guidelines.

What has the Mayor committed to, and when and where?

London Environment Strategy (2017-18)[27][28]

- The LES (May 2018) stated that the Mayor seeks to "meet WHO guidelines limits for PM2.5 and PM10 by 2030". It set out the requirement for "establishing and achieving new, tighter air quality targets for a cleaner London, meeting World Health Organization (WHO) health-based guidelines by 2030". At that point, the WHO guidelines for PM2.5 and PM10 were weaker than they are now (2021). These guidelines are now the interim targets, not the full updated (2021) targets.

C40 Clean Air Cities Declaration (2019)

- The Mayor signed this declaration committing London to align with WHO guidelines for PM2.5 by 2030. **At that point, the WHO guideline for PM2.5 was 10 ug/m3.**[29] This value is now the **interim** target, **not** the full (2021) target.

City Hall press release on improved air quality since 2016 (April 2023)[30]

- "The Mayor has committed to bring levels of fine particulate matter (PM2.5) in London down to 10ug/m3 by 2030 – a decade before the new UK legal deadline – which current data reveals is also achievable."
- "In 2019, the whole of London exceeded the WHO annual average guidelines of 10 µg/m3 for NO2 and 5 µg/m3 for PM2.5. Forecasts show that all of London will continue to exceed them in both 2025 and 2030."
- "None of the major roads in London met the WHO annual mean air quality guideline of 10 µg/m3 for NO2 in 2019, and that will still be the case by 2025 or 2030."

[27] LES press release (May 2018)
[28] London Environment Strategy PDF (May 2018)
[29] Air Quality News ("According to C40 Cities, if the 35 signatories reduce annual average PM2.5 levels to WHO guidelines (10 ug/m3) by 2030, it could avoid 40,000 deaths each year."
[30] Mayor of London, New data reveals Mayor's policies have significantly improved air quality in London since 2016 (2023)

Appendix 2)

PM2.5 levels according to the London Air website

The table below shows year-to-date concentrations for PM2.5, as monitored at sites across London, according to the London Air website, in May and November 2025. These numbers outline that there is a long way to go before we can say ‘we’ve cleaned up London’s air’. We are far from achieving the Breathe Life Commitment made in 2017 to achieve the outdated WHO-legal levels by 2030. Action on traffic and domestic burning is critical.

Monitor	2024	Annual concentrations to May 2025	Annual concentrations to November 2025
Lambeth Brixton Road	9	14	10
Southwark Circular Road	9	15	-
Dartford Bean Lane	8	12	-
Bromley Harwood Road	9	12	-
Merton Mitcham	Not monitored	11	-
Brent Art Franklin School	9	13	10
Richmond	Not monitored	20	-
Wandsworth Putney Road	Not monitored	15	-
Greenwich Westhorne	8	13	9
Lewisham New Cross	8	13	15
Lewisham Deptford	9	15	-
Southwark Vicarage Grove	9	18	18
Westminster Covent Garden	13	18	-
Islington Holloway Road	Not monitored	18	11
Westminster Oxford Street	13	24	-
Brent IKEA	10	18	13

Possible.
Inspiring climate action

London Assembly Environment Committee: call for evidence

January 2025

Overview

Possible is a climate charity with a vision of a zero carbon Britain, built by and for everyone. We campaign for climate action that delivers benefits for both people and planet: lower bills, safer neighbourhoods, greater equality, better physical and mental health, and closer communities.

London has made great progress in some areas - like the world-leading ULEZ scheme which has cut air pollution across the capital - but there's so much further to go, and clear areas for improvement and attention. These include:

- **Traffic reduction and modal shift** - these are critical for achieving a range of environmental and social goals, but progress has been slow or non-existent on several indicators in the Mayor's Transport Strategy (2018) and the net zero requirement of a 27% reduction in car traffic by 2030.
- **Boosting climate resilience by planting trees in parking spaces, not on pavements** - there is huge potential for making streets greener and more climate resilient whilst also helping to achieve traffic reduction targets and increase biodiversity, by reallocating car parking spaces for kerbside tree planting and urban greening. Current approaches compromise accessibility by planting trees on pavements.

- **Proven models for community repair which tackle waste** - making it easy, accessible and affordable to get items repaired instead of buying new. Possible's Fixing Factory model, with branches in Camden, Hackney and Haringey, have already demonstrated how high street repair can reduce electronic waste, develop green skills, and cut bills for lower-income communities.
- **Continuing to oppose airport expansion** - stopping airport expansion, and reducing overall numbers of flights, is important to cut emissions and reduce health impacts on airport communities.
- **Banning adverts for high-carbon products** - advertising plays a key role in driving demand for damaging high-carbon products such as flights and SUVs, but the prevalence of these adverts on Transport for London networks undermines the Mayor's commitments. The Mayor could go further and faster to remove these[1].

Traffic reduction and modal shift

London must cut unnecessary vehicle trips to meet environmental goals, unlock a cleaner transport system, and boost public health. However, as admitted by the Mayor in June 2025, we are not on track to meet the 27% reduction in car traffic required to hit net zero by 2030[2]. **One of our biggest questions for this mayoral administration is how they plan to achieve this** in the absence of a fair and progressive road user charging scheme.

Traffic reduction and modal shift interact with several of the Environmental Committee's five themes. Driving is one of the major sources of carbon emissions, air pollution, and noise pollution; and is closely tied to climate adaptation. High levels of car use - whether those cars are electric or fossil-fuelled - also contribute to numerous non-environmental issues affecting Londoners, including collision rates and less connected communities. Tackling traffic (and parking) means more space for buses, cycles, walking and wheeling, socialising, trees, rain gardens and SUDs.

However, traffic has been rising since 2020, going in the wrong direction to meet this target of a 27% reduction[3]. Similarly, despite new public transport links and a welcome rise in cycle numbers, there is an evident lack of progress

[1] Badvertising, TfL "lawfully entitled" to adopt Low-Carbon Ad Policy, say lawyers (2025)
[2] Mayor of London, Net Zero London: An Updated Pathway (2022)
[3] Clean Cities, Progress in meeting London's transport targets (2025)

on indicators set out in the Mayor's Transport Strategy (2018), with sustainable modal share and physical activity levels no higher than a decade ago, and bus speeds continuing to fall[4].

Given that traffic reduction frees up space for sustainable modes, it's difficult to imagine how the targets in the Mayor's Transport Strategy can be met without significantly increased attention on modal shift and traffic reduction.

To add to this, electric vehicles are important for those who need to drive, but prioritising electrification as a strategy risks additional environmental and social impacts. Emerging evidence suggests that owners of EVs tend to drive more, while the growing size and weight of vehicles in general increases their contribution to air pollution through tyre and brake wear and eats up road space that could be used for climate adaptation - while also making our roads more dangerous, especially for children.

The Mayor confirmed in a June 2025 scrutiny session[5] that he remained committed to the 27% traffic reduction target, which is welcome news. However, given that this target appears very stretching, and that there are less than five years remaining to achieve it, we would like to see the Environment Committee continue to push to understand the Mayor's approach.

Adapting London to the impacts of climate change: repurposing parking for street trees

Many parts of London cannot be made climate resilient without roadspace reallocation away from parking, because **there is no other space available for trees and greening that won't compromise the accessibility of the walking environment.**

London must prepare for more extreme heat, and more frequent flooding. Street trees are the single most effective intervention, reducing temperatures by 8 degrees, whereas parked cars increase them by almost four degrees[6].

The availability and cost of parking has a more significant impact on car ownership than insurance or fuel costs[7]. TfL's London Travel Demand Survey

[4] Clean Cities, Progress in meeting London's transport targets (2025)
[5] Mayor of London, Mayor admits traffic reduction in London is not on target (2025)
[6] Possible, Street Trees (2025)
[7] Local Government Association, Decarbonising transport - Climate smart parking (2020)

illustrates this relationship clearly. Reducing parking supply in cities has been shown to lead directly to an overall reduction in car miles.

However, all new trees in the Trees for Streets crowdfunding programme in London are installed on pavements, in most cases leaving well under 2m clear footway width - the minimum specified for pedestrian comfort and disabled access in London's Walking Action Plan.

Repurposing car parking has huge cross-cutting potential across multiple strategies, which include:

- London Plan Update
- Urban Forest Plan
- Mayor's Transport Strategy
- (Forthcoming) Heat Risk Delivery Plan
- Surface Water Strategy
- Local Nature Recovery Strategy

Barriers to progress: Cost of kerbside tree planting; and the presence of utilities. However, there is potential for delivering kerbside tree planting & green infrastructure via streetworks through collaboration between GLA Infrastructure Coordination Service[8] (Streets Service), utilities companies and London Borough Highways teams.

Examples of progress: Camden, Hackney, Westminster have successfully replaced car parking with kerbside street trees in some areas. Possible has produced a data explorer[9] to identify priority locations with the highest need for converting on street parking for green infrastructure, including trees.

Waste and Circular Economy

Examples of progress:

In 2022, together with partners The Restart Project, Possible set up its first Fixing Factory: A permanent community repair hub helping local people fix broken electrical items rather than throw them away. In 2026, we now have three Fixing Factories across Haringey, Hackney and Camden, with two more being

[8] Mayor of London, Embedding Change
[9] Possible, Data Explorer (2025)

developed this year. The model has also been replicated in Northern Ireland. Fixing Factories run weekly workshops to teach people to fix broken items, offer free weekly drop-in community repair sessions and, with our team of 45+ volunteers, repair and donate or resell items diverted from the waste stream. In the past six months, Fixing Factories have conducted 320 item repairs, enabling local people to avoid 824kg of waste and save 10,000 kg of carbon emissions. We have also trained over 450 people in electronics repair, helping them gain valuable skills to reduce waste - with ten people gaining paid work in the repair industry as a result of their Fixing Factory engagement in 2025.

24% of attendees at our free community repair sessions are unwaged, demonstrating that Fixing Factories help those on no/low incomes to keep essential electrical items in use for longer. Over 50% of participants come to the area specifically to visit a Fixing Factory, showing Fixing Factories' roles in High Street regeneration.

Hackney Council became the first London Council to declare that their advertising and sponsorship policy will not "promote goods or services that contradict the council's Climate Action Plan, for example by encouraging the use of fossil fuels". This is an enormous step forward for Londoners and the circular economy, by helping to reduce consumption of the wasteful, high-carbon products that fuel the climate emergency.

Case studies (Name changed to preserve anonymity):

Sonya is a local resident to the Camden Factory, which is based in an area of high deprivation. Her husband died several years ago, and he was the 'fixer' around the house. Since then, when her electrical items break, she takes them to the Camden Fixing Factory. She is a regular attendee there, where she is known by name to the workshop manager and volunteers. She cannot afford to make a donation following her repair, but to show her gratitude she often makes biryani and brings it for the volunteers to eat together at lunch time.

Barriers to progress:

Funding and space availability for community-led repair pathways are the two greatest barriers to progress. Councils have been very supportive of the project, but securing high street spaces for Fixing Factories at low- or no rent has proved so challenging that two of our three sites are commercially rented.

Rent-free or low-rent spaces should be earmarked for community-led repair, thereby supporting the vast network of pop-up repair cafes in the capital to secure a permanent space. Funding for community-led repair should be built into new waste contracts as standard, to reflect the value these projects bring in changing behaviour, reducing waste and building community cohesion.

Lessons learnt:
Londoners have a huge appetite for electronics repair. The Fixing Factories have attracted a team of 45+ volunteers, offering over 1,200 hours in the past six months to help their neighbours fix broken items.

Topics or issues which have been overlooked:

Electronic waste is the UK's fastest growing waste stream. However, it is often absent from Councils' climate action plans. Community-led repair is not included as standard in councils' waste contracts, and most boroughs do not offer small e-waste collection from households, making it complex and difficult to keep valuable items in use. London councils should offer free e-waste collection as standard, and work with partners such as Fixing Factories to ensure that this e-waste is assessed for repair before being recycled, following the model of the relationship between Haringey Fixing Factory, Veolia and Haringey Council.

High Street repair businesses play a critical role in enabling Londoners to keep electronic items in use. The Mayor of London and the London Assembly should support the call in the Repair and Reuse Declaration to remove VAT on repairs and scale up repair voucher schemes to promote repair in London. The Mayor could also offer zero business rates for repair hubs and repair businesses to incentivise the growth and continuation of these businesses. There should also be London-wide efforts to provide training, accreditation and apprenticeships to grow the repair skills within London. This can be in collaboration with Fixing Factories, or otherwise.

Additionally, the issue of advertising for high-carbon products has been historically overlooked. Since the Mayor of London launched the London Environment Strategy in 2018, London has been committed to ending fossil fuel pollution and improving air quality. As part of that, Transport for London (TfL) - which owns one of the world's biggest advertising estates - is charged with leading by example. However, London's transport network currently heavily

platforms advertisements for polluting fossil fuel products and lifestyles. These directly conflict with London's plan to be a world leading city on action for clean air and the climate. TfL should add fossil fuel companies, airlines and SUV makers to the list of advertisements that are not permitted within their advertising policy.

Aviation

Overview

The government's plan to increase aviation and encourage airports to expand flies in the face of climate science, and puts achieving the UK's carbon budgets at risk. It also poses a serious risk to the health of Londoners, who already face the world's worst air pollution from airplanes.

Barriers to progress, and what further action is needed

If the goal is to increase international departure capacity and ensure London is a hub for global travel, there are alternatives to airport expansions and all the harms they will cause. The UK's international rail link to the continent from St Pancras station is really under-utilised, with potential for a huge increase in trains running on the existing infrastructure. This is a missed opportunity to increase rail travel as a sustainable alternative to aviation. In 2024, there were 17 million flights from London airports to destinations in Europe for which rail is competitive on journey times. Moving some of these journeys from air travel to international rail would be a huge win for the climate, and would reduce the noise and air pollution faced by Londoners.

Topics or issues which have been overlooked

London has made progress on reducing air pollution from cars through ULEZ. However, the issue of air pollution from airports, which disproportionately impacts low-income communities, has been overlooked. London is the most exposed city in the world to air pollution from aviation, and Heathrow airport is the second-worst globally for climate impact. A study by Transport and Environment last year on the health impacts of ultrafine particle pollution estimated that ultrafine particles from Gatwick, Stansted, Heathrow and Manchester could be associated with an additional 41,000 cases of high blood pressure, 44,000 cases of diabetes and 2,200 cases of dementia, which of

course impose costs on our NHS as well as seriously harm people's lives. Expansion, whether at Heathrow, Gatwick, London City Airport or elsewhere, leads to an increase in noise pollution, air pollution and congestion on local roads. Research from UCL showed that people living under flight paths had a 2-4 times higher risk of a "major cardiac event," likely linked to the increase in stress from lack of sleep and noise pollution. The proposed expansion of London City Airport is particularly egregious, as the surrounding area which will be exposed to the increased air pollution is relatively poor and certainly will not be the ones who benefit from the increase in private jet flights from the airport.

We are pleased to note that the London Assembly Environment Committee has written to the Secretary of State for Transport, calling for the Airports National Policy Statement to include targets for noise impacts, no additional air quality impacts from airports, and progressively tighter standards to lower emissions over time. The Committee should continue to push for a cap on overall flight numbers and to campaign against airport expansion. Reducing flights would improve Londoners' quality of life and reduce air and noise pollution, as well as allowing our city to lead the way in tackling the climate crisis in an equitable way.

Port of London Authority

London Assembly Call for Evidence: London's Environment – progress on priorities

Topics	Air Quality	Biodiversity	Climate/ Other
Examples of progress, including short case studies where relevant, that London is making on its environmental priorities			
Barriers to progress, and views on what further action is needed from the Mayor and other stakeholders;	**Renewable Tax Fuel Obligation (RTFO).** The RTFO is UK Government policy that requires a certain percentage of transport fuel supplied to be renewable. The policy commenced on 15 April 2008 and is one of the government's main policies for reducing greenhouse gas emissions from transport. The relevant transport modes covered by the policy are: • road vehicles • non-road transports – including non-road mobile machinery (NRMM) • maritime, if the fuel used is a renewable fuel of non-biological origin (RFNBO) The RTFO currently excludes vessels that travel on tidal waters and estuaries. This means that all inland operators on the Thames cannot benefit from the RTFO despite being one of the hardest sectors of transport to decarbonise due to, lack of, and complexity of infrastructure and tight operating margins in some cases. **We would recommend the London Assembly use their influence to change this legislation to ensure Thames operators can benefit from the RTFO**. If	There are a number of non-statutory plans and strategies with similar aims. There may be opportunity to simplify this framework. For example, the Local Nature Recovery Strategy, is required under the Environment Act and acts as the primary strategy for delivering nature recovery across London. Alongside this there are also other initiatives, such as the Green Infrastructure Framework (currently in production) and the Clean & Healthy Waterways Plan. We recommend the consideration of biodiversity condition and value in the metrics used for annual reporting (State of London) The PLA welcomed the opportunity to contribute to the biodiversity and ecology working group and note that there may have been additional opportunities to incorporate stakeholder feedback, particularly in recognising the strategic significance of the Thames.	**Reducing non-residential emissions.** The PLA has a strategic focus on Maritime emissions. One barrier to decarbonising river vessels is planning and providing electric connections from land to shore, enabling vessels to either plug-in at berth (therefore not burning fuel for auxiliary power) and even charging batteries for electric propulsion. The London Plan could advise local planning authorities on how to plan for connections infrastructure that would enable this transition. Aligned with this, is developing greater residential-stakeholder awareness of the development impact of reaching Net Zero emissions in London, to mitigate against community reaction **Climate interdependent risks**

	the RTFO were amended to include tidal waters second generation biofuel like hydrotreated vegetable oil (HVO) (and eventually RFNBO) would become a feasible and accessible measure to reduce emissions from river vessels. The PLA commissioned UCL to conduct a tailpipe emissions test on a harbour service launch vessel operating on HVO in the PLA fleet. Results showed a minimum reduction of 79% in particulate matter, and 51% reduction in nitrogen dioxide across several engine conditions which led to fleet wide adoption of HVO use since 2023. Several operators on the Thames have trialled the fuel due to these benefits but have since had to revert to diesel due to the unsustainable operating costs. **Modal Shift Revenue Support Scheme**. The PLA have been actively working with operators in the Net Zero Coalition since 2024 to promote and increase interest in the use of London's waterways as a transport corridor. Moving cargo transport from the road networks to the river reduces population exposure to polluting emissions from HGVs and is more efficient method in bulk alongside many other environmental and social benefits. During this collaboration, access to funding streams such as the Modal Shift	Habitats of the tidal Thames to be included in the C&HWP as it is in the Local Nature Recovery Strategy as priorities.	**assessment** – the delivery plan acknowledges that the climate impacts are increasing and that the GLA's role is to bring partners together and to coordinate investment. The delivery plan doesn't clearly specify interdependency risk pathways that will involve all stakeholders (e.g. power ->transport>port logistics). The PLA and the Thames can strengthen **interdependent risk management** by mapping critical infrastructure along the Thames (already started through the **PLA Masterplan** – like important utilities, transport nodes, depots, wharves) and using this information to prioritise funding through Green Roots, or strategic projects that reduces cascading risk Integrate PLA into the workstreams on **extreme heat** and **flood risk** to build **joint contingency plans** for river-based transport when rail or road networks are disrupted. Under the **London Urban Forest Plan and Green Infrastructure**

	Revenue Support Scheme (MSRS), and the Waterway Freight Grant (WFG) have been heavily signposted. The PLA plan to assist operators crafting applications for these funding schemes with the aim of encouraging more river freight opportunities - something that small-medium enterprises often don't have the resources or expertise to complete. This is likely contributing factor as to why river freight applications have been awarded just 0.2% of the total MSRS funding available from 2015-2022. **We would highly recommend the extension of the MSRS and the WFG funding schemes that are currently due to expire on the 31st of March 2026.** This funding opportunity is a key facilitator of river freight projects, and without it there is no incentive for operators to investigate the opportunity due to the economic difficulties with initiating such projects.		**Framework,** PLA could help identify riverside neighbourhoods with high heat vulnerability and low canopy and in the same time advice on the feasibility of extending these areas **without jeopardising the safety of navigation.**
Lessons learned from Londoners and London's environmental groups working to improve London's environment over the past decade;			
Topics or issues which have been overlooked. which the Environment Committee should scrutinise in greater detail;			

• On these, the Committee would welcome a short summary (around 250 words) of the issue, how it affects London, and what the Mayor or other stakeholders could do about it			

Additional Topics = Water Quality:

Within the current London Environment Strategy, water quality is referenced throughout in relation to the development of Sustainable Drainage Systems (SUDs) and flood risk management. The Port of London Authority (PLA) welcomes the renewed focus on London's rivers in 2025 through the development of the Clean and Healthy Waterways Plan. The tidal Thames is London's most iconic river which has seen significant improvement in water quality in recent decades due to increased investment and work from many organisations. We see the London Environment Strategy as a further opportunity to embed actions in the themes already identified that will contribute to improvements in water quality.

1. **Examples of Progress:**

Our 2050 Vision for the tidal Thames is of a clean, thriving river, free of sewage and other pollutants, supporting greater biodiversity and recreational use. While improvements in infrastructure and policy have enhanced water quality, the Environment Agency reports that the tidal Thames is not meeting its water quality targets under the Water Framework Directive. Further action is urgently required to address pollution, especially from Combined Storm Overflows (CSOs) and sewage treatment works. In response, over the last 10 years the PLA has taken a leading role in tackling pollution through partnership driven initiatives including developing the Thames Litter Forum in 2014 and launching the Thames Litter Strategy in 2018.

London Assembly Call for Evidence: London's Environment – progress on priorities

Partnership working is essential to delivering the required improvements to water quality that are required in the Thames. Collectively, partners bring together different expertise is various fields and the PLA uses its convening power to bring about positive change. Building on our Thames Litter Strategy, in 2023 the PLA launched the Clean Thames Manifesto[1] which addresses broader pollution issues, including sewage discharges. It establishes a framework for collaboration with water companies, regulators, and other stakeholders.

Additionally, in 2024 together with over 20 partners[2], the PLA launched the Clean Thames Plan[3]. This comprehensive strategy outlines efforts to prioritise ten key areas for action through to 2030. These areas include:

a. Seek opportunities for nature restoration.
b. Collect, use & share meaningful data and research.
c. Engage with the public to access, understand and value the river.
d. Create funding opportunities to enable innovation and technological development.
e. Partner with businesses to co-develop best management practices to reduce pollution.
f. Thames is an evidence-based exemplar for solutions to river pollution in the UK.
g. Combat pollution pathways into the river.
h. Co-produce holistic and enforceable legislation.
i. Understand the plastic lifecycle to tackle sources of litter.
j. Remove existing litter in the river.

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[1] https://pla.co.uk/clean-thames-manifesto
[2] Our Clean Thames partners: Active360, British Plastics Federation, British Rowing, Bywaters, Cory, Cross River Partnership, DP World, Drinkable Rivers, Environment Agency, Essex Wildlife Trust, Gravesham Borough Council, GreenSeas Trust, Hubbub, HR Wallingford, London Borough of Hammersmith & Fulham, London Borough of Newham, London Borough of Richmond Upon Thames, London Borough of Tower Hamlets, Medway Swale Estuary Partnership, Natural England, Natural History Museum, Port of London Authority, Queen Mary University of London, River Thames Society, Royal Holloway London, South East Rivers Trust, Thames21, Thames Estuary Partnership, Thames Litter Forum, Thames Rivers Trust, Tideway, University of Reading, Way to Eco, Zoological Society of London (ZSL)
[3] https://pla.co.uk/cleanthamesplan

London Assembly Call for Evidence: London's Environment – progress on priorities

The priorities set out in the Clean Thames Plan align with the thematic actions within the London Environment Strategy including the need to integrate nature-based solutions such as green infrastructure and constructed wetlands and understanding the lifecycle of plastic waste to tackle sources of litter in the river. Since the Plan was launched in 2024, 77% of the actions are in progress or have been completed by both the PLA and the wider Clean Thames Partnership. This includes work undertaken in summer 2025 to remove wet wipe island in Hammersmith where over 5 million wet wipes were removed from the foreshore in a first-of-its-kind project in the UK.

2. Further Opportunities

As referenced in the current Environment Strategy, there are several opportunities for water quality to be improved through the delivery of green infrastructure, reduced single use waste and better flood risk management.

The PLA supports the GLA and Thames Water's work to explore delivering sustainable urban drainage schemes (SUDs) through streetworks. SuDS manage rainwater at source, slow runoff, and filter pollutants, contributing to improved river and groundwater quality. However, we recognise the limitations and challenges of SuDS in the urban London landscape. Thames Water's Drainage and Wastewater Management Plan picks up this challenge, proposing the management of 7,000 ha of land using SuDS across London by 2050. We believe that the GLA are uniquely positioned to promote the delivery of SUDs throughout London's Boroughs which will in turn provide huge benefits to both climate resilience and river water quality.

The PLA removes up to 200 tonnes of waste from the Thames each year, much of it comprising plastic pollution collected through our strategic litter collectors positioned across the river in London. The London Environment Strategy sets out the Mayor's intention to introduce targets to reduce waste and to continue initiatives aimed at tackling single-use plastics. The PLA fully supports this ongoing work, as reducing plastic packaging will help prevent waste from entering the environment and ultimately lower the volume of plastic litter reaching London's rivers.

The Strategy recognises that flooding from combined sewer overflows has a direct impact on water quality. Over the past three years, the PLA has worked closely with water companies and regulators along the Thames to drive major infrastructure investment aimed at upgrading sewage treatment facilities and reducing Combined Storm Overflows (CSOs). This has been supported by strengthened

collaboration with water companies, regulators, local authorities and community groups. There is further opportunity, through both the London Environment Strategy and the Clean and Healthy Waterways Plan, to secure continued investment in London's sewer infrastructure. Such improvements will help to reduce polluted urban run-off, enhance river ecology and water quality, and increase both biodiversity and the overall amenity value of the Thames and other rivers in London.

Clean Air IN LONDON

22 January 2026

Dear Sir and Madam

Environment Committee – Call for Evidence on Progress on Environmental Priorities

Thank you for confirming Clean Air in London's (CAL's) seat at the London Assembly Environment Committee's (LAEC's) forum titled 'Temperature check: Is London hitting its environmental targets?'.

CAL is London's foremost campaign group dedicated to improving air quality in London and beyond[1]. We wrote our first letter to the Mayor of London on 9 April 2006[2] i.e. nearly 20 years ago.

'One air' comprises local air pollution and greenhouse gases. In turn, local air pollution comprises particles and gases. The particles are regulated by their maximum diameter (e.g. $PM_{2.5}$ or PM_{10}) and the cloud of gases by individual gases e.g. nitrogen dioxide (NO_2). The World Health Organisation (WHO) slashed its guidelines for $PM_{2.5}$ and NO_2 in September 2021[3]. There are also legal limits.

CAL is concerned that the current Mayor of London seems to be treating his third term as a lap of honour for notable achievements for cleaner air in his first two terms.

CAL wishes to bring to the LAEC's attention that:

1. Sir Sadiq Khan's manifesto in 2016[4] (numbered page 8) promised:

   My priorities: ….

   "Restore London's air quality to legal and safe levels, with action to make travel greener and pedestrianise Oxford Street, while protecting the green belt."

2. Greater London failed to comply with the nitrogen dioxide (NO_2) annual mean limit value of 40 micrograms per cubic metre ($\mu g/m^3$) in 2024. As the Mayor of London (rightly) highlighted,

[1] https://cleanair.london/
[2] https://cleanair.london/policy/mayors-consultation-on-the-low-emission-zone/
[3] https://cleanair.london/policy/new-who-air-quality-guidelines/
[4] https://cleanair.london/app/uploads/CAL-325-Sadiq_Khan_Manifesto-090316.pdf

Clean Air IN LONDON

Defra's claim of compliance under its arcane procedures excluded facts on the ground at regulatory standard monitors e.g. Brixton Road[5]. This legal limit was set in 2008 to be achieved by 1 January 2010. A Supreme Court judgment in 2015 confirmed that these limits have to be achieved (virtually) everywhere as soon as possible.

3. A Freedom of Information/EIR request by CAL revealed that the position is far worse than expected with 17 boroughs reporting one or more monitoring sites exceeding the UK annual mean NO_2 legal limit in 2024[6] (with 39 in total). Bexley and Croydon had not submitted their reports by December 2025[7]. The Mayor published data for all 1,945 NO_2 diffusion tube sites[8].

4. Mayor has committed to achieve an annual mean for $PM_{2.5}$ of 10 $\mu g/m^3$ by 2030 i.e. WHO's interim target on the way to the 2021 guideline of 5 $\mu g/m^3$. However, it is unclear whether he means a limit value or Defra's Annual Mean Concentration Target (AMCT)[9] which applies only at Defra monitoring stations and was achieved everywhere throughout the UK in 2024 except at Marylebone Road. The latest London Atmospheric Emissions Inventory 2022 (LAEI) identifies key sources.

5. The Mayor has so far refused to commit to comply with the WHO's equivalent interim air quality guideline for NO_2 of 20 $\mu g/m^3$ by 1 January 2030. This is despite this limit value and deadline applying across the whole of the European Union by the same date (Directive 2024/2881 published on 10 December 2024) and the Mayor being Co-Chair of the C40 Cities.

6. In a sense, London is back where we thought it was in 2006 with NO_2 levels two to three times WHO guidelines in our busy streets. The Mayor's complacent reaction to this public health crisis is to tweet saying "*We've cleaned up our air – now it's time for our rivers.*"[10]

The Mayor's failure to highlight the post-2021 scale of the crisis and update policies, despite health evidence, is shocking. Further, how will he respond to the Environmental Audit Committee's new inquiry on air pollution in England[11]? Will he demand tighter standards and specific new powers?

CAL encourages the LAEC to consider how much has been achieved for cleaner air in the last 20 years and what still needs to be done. This is particularly poignant as we approach the 70th anniversary of the first Clean Air Act 1956 on 5 July 2026 with visible smoking still a problem in London and air quality guidelines widely breached.

Yours faithfully

Simon Birkett
Founder and Director

[5] https://www.london.gov.uk/london-meets-legal-limits-toxic-no2-pollution-first-time-almost-200-years-earlier-predicted
[6] https://www.london.gov.uk/who-we-are/governance-and-spending/sharing-our-information/foi-disclosure-log/eir-local-air-quality-management-reports-jan-2026
[7] https://data.london.gov.uk/download/e66gp/y5s/Executive%20Summary%20(2024).pdf
[8] https://data.london.gov.uk/dataset/air-quality-monitoring-diffusion-tube-results-e66gp/
[9] https://uk-air.defra.gov.uk/pm25targets/calculation
[10] https://x.com/mayoroflondon/status/2002350997721481345
[11] https://committees.parliament.uk/work/9561/air-pollution-in-england/

Crane Valley: Evidence Submission

The Crane Valley covers 125 sq km of West London across parts of five boroughs and is home to 650,000 people. The Crane Valley Partnership is a pilot for the Smarter Water Catchment programme – which is investing over £5m enhancing the green and blue spaces of the Crane valley to 2030 and has already identified a further £20m+ of investment across our key environmental and community themes. All our work is catchment based, partnership led and community rooted and we see this as a new and innovative model for addressing otherwise intractable issues around ownership and responsibility in a complex and disconnected ecosystem. A summary of our work to date and aspirations for the future can be seen in our State of the Crane Environment Report which came out in February this year https://www.cranevalley.org.uk/wp-content/uploads/2025/02/State-of-the-Crane-Environment-Report-February-2025.pdf

We are already engaging with the GLA regarding the Healthy Rivers programme and two of our partners (Joe Pecorelli from ZSL on water quality and Navdeep Deol from NPCF) are closely involved with the development of the programme. We recently received major funding support through the GLA's Green Roots fund to help deliver the Crane Valley Trail which runs for around 40km from the source of the river in Harrow to the confluence with the Thames in Hounslow.

Rob Gray
Chair and Director - Crane Valley CIC

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Canal & River Trust
Making life better by water

Welsh Harp Brent Reservoir East Marsh Restoration

The Canal & River Trust is the charity which cares for 2,000 miles of inland waterways across England and Wales, with 100km of canals and navigations in London including the Regent's Canal, Grand Union Canal and River Lee Navigation.

The Trust is also responsible for more than 70 reservoirs which help to feed the canal network, including the Welsh Harp/Brent Reservoir in North West London, straddling the border between Barnet and Brent.

The blue space and blue infrastructure provided by waterways can play a significant role in helping to address many of the challenges arising from the health, biodiversity and climate crises that we face as a nation. They can improve wellbeing outcomes and tackle wellbeing inequalities, particularly for those from economically disadvantaged backgrounds living in metropolitan and urban areas in England and Wales.

Poor mental health and physical inactivity present an economic and social cost to the nation. Many of the communities living in close proximity to our canals, other waterways and waterspaces have high concentrations of adult and child obesity and type 2 diabetes, and live in urban areas with green space deficit. There is real potential for our network to help tackle these challenges being faced in these deprived areas.

Unequal access to greenspace leads to health inequalities and disparities such as chronic stress and sedentary lifestyles, placing an intolerable burden on the NHS and the wider healthcare system. The most economically disadvantaged regions of England and those areas most affected by the COVID-19 pandemic in England have the greatest health and wellbeing inequalities, the highest urban green space deficit (access to nature) and limited access to private garden or private outdoor space.

The natural outdoor environment is increasingly valued as an important public health resource. Recent research highlights physical activity, social interaction, and environmental factors as potential pathways linking blue space and health. A research initiative, BlueHealth, found that access to urban blue spaces such as canals and rivers, resulted in significant improvements in wellbeing and mood for individuals walking through urban blue spaces, particularly those from deprived communities.

We have a strategic focus on tackling physical inactivity, promoting an active lifestyle, addressing health inequalities and making a difference for children and young people. Our canals and programmes, in partnership with others, are providing a platform to help improve health outcomes.

Brent therefore remains a key area for the Trust, with one of only two full-time London Community Roots co-ordinators based there to engage the community in taking pride in and ownership of their local green and blue space.

The Welsh Harp is one of the earliest designated Sites of Special Scientific Interest (SSSI), holding that status since the 1950s, as an important breeding habitat for bird species including the common tern and great crested grebe.

Put into the care of the Trust from its creation in 2012, the Welsh Harp had not been managed effectively since the 1980s, when a large-scale restoration created a series of back channels. Over time, these channels became degraded and clogged, reducing their value for wildlife.

The aim of the current East Marsh restoration project is to reinstate and enhance these historic channels and improve the site's overall ecological condition.

The £300,000 project was funded by the London Borough of Barnet and the Kusuma Trust, with works being delivered by the contractor Ebsford. Construction started in late October 2025.

Large-scale tree removal has opened up the site and revealed three distinct islands. Approximately 160 tonnes of wood chippings have been removed across the site, including material cleared from Italy Island. One entirely new channel has been created. A second, previously blocked channel has been re-defined and restored. Five new islands have been created across the marsh. Four new wetland ponds have been constructed to support wetland biodiversity.

Further work will include establishment of wildflower meadow areas to increase plant and invertebrate diversity, and construction of a new bird hide to support monitoring, education, and engagement. Work to come in the northern area of the site will include installation of an eco-friendly membrane and placement of approximately 400 tonnes of shingle to create suitable habitat for wader birds.

The project will significantly increase habitat diversity across the SSSI. Newly created channels, ponds, islands, and shingle areas will support a wider range of bird and wetland species. Biodiversity benefits are expected to increase over the coming years as habitats establish and mature.

The project represents a long-term investment in restoring and safeguarding a high-value site in a pressured urban environment.

-ends-

Alex Paterson (he/him)
Communications & Campaigns Manager

London & South East
Canal & River Trust, The Toll House, Delamere Terrace, Little Venice, London, W2 6ND

Canal & River Trust
Making life better by water

Submission to the London Assembly Environment Committee

Call for Evidence: London's Environment – Progress on Priorities

Executive summary

- This submission responds to the Committee's request for evidence on overlooked topics warranting greater scrutiny. We argue that **youth engagement in London's green transition** represents a significant gap in current environmental policymaking that the Mayor and GLA should address as a strategic priority.
- We provide evidence in the form of the results of our survey, in partnership with Islington Council, of young people in that borough. We found that 74% of young people agree climate change should be a top priority for local government, and 70% want to be more involved in local decision-making.
- However, their voice is not properly represented: for example, in Islington's Liveable Neighbourhoods consultations, the 16–26 age group comprised just 1% of respondents—the lowest of any demographic. As a consequence, political leaders and their policies are not meeting the needs of this group. We evidence this by showing how, in Islington, safety is a key barrier for young people to take up cycling.
- We argue the Mayor should commission a London-wide youth engagement strategy for environmental policy, working with boroughs and youth organisations to co-design consultation processes that reach young people where they are—in schools, youth clubs, universities, and online.
- We also argue the GLA should pilot deliberative engagement models focused on young Londoners (building on successful examples like Islington's Climate Panel) and establish mechanisms for ongoing youth input into environmental scrutiny, not just one-off consultations. Communications should be co-designed with young people to ensure accessibility and relevance.

Supporting evidence

- Our submission draws on findings from *Rethinking Green Transitions: A Youth-Led Peer Research Project in Islington*, published in July 2025 in partnership with Islington Council and Partnership for Young London.
- The project engaged 184 young people aged 16–26 through a survey, interviews, and focus groups, and was led by four young peer researchers working alongside policymakers from Islington Council and researchers from LSE Cities. Our key finding is that young people support environmental action, especially when it connects with efforts to tackle economic and social inequality, but feel excluded from it.

- Our survey found that 74% of young people in Islington agreed that addressing climate change should be a top priority for local government. However, as our interviews and focus groups showed, awareness of how to participate in environmental decision-making remains critically low.

- We found that 72.4% of surveyed young people had never heard the phrase 'Liveable Neighbourhoods' despite it being their council's flagship programme. We also found that 70% want to be more involved in local decision-making but 38% said they didn't know how.

- That lack of involvement means policymakers are less aware of this group's wants and needs. Moreover, it means young people themselves don't have time and space to develop their understanding of the green transition and explore their priorities for London's future. Our conversations with young people illuminated their nuanced and sometimes conflicted views on topics such as car ownership. More investment in youth engagement would help young people to develop their views and empower them to take part in public debates over policies like Liveable Neighbourhoods.

- Our survey, interviews and focus groups found that safety concerns are a major barrier to participation for young people using active travel, . For example, 'Unsafe' was the second most common emotion reported when walking in Islington and bike theft was mentioned 56 times as a barrier to cycling.

- Similarly, young women and ethnic minority young people reported heightened safety concerns, including harassment and racial profiling. Safety concerns led some young people to prefer private cars despite supporting greener transport options in principle.
- One participant told us: *"It's not safe. I don't want to go out anymore. I got mugged the other day. It was terrible. So I'd rather hang out at my friend's place."* Another said: *"If I was less scared to cycle in London, I would do that. But I've had a bike incident before, so [lack of safety is] the only thing that's preventing me from [cycling]."*

- Another example is that 90% of survey respondents agreed that the green transition must address economic and social inequality. Young people were sceptical of environmental policies that do not engage with the cost-of-living crisis, housing affordability, and spatial inequalities in access to green space and clean air.

- One participant said of the improvements to the public realm delivered by Islington's Liveable Neighbourhoods: *"This isn't doing enough. This isn't changing things enough. Like, I want a bench, sure, but I also want to be able to afford to live here."* Another noted: *"A lot of the side roads are a lot more expensive than the houses on the main road, so it feels like people who can afford more are able to benefit from less noise and less pollution."* This strong perception of the uneven impacts of green transition policy is vital to engage with (regardless of recent research on LTNs and equity which appears to refute the latter point).

Lessons learned

- The Rethinking Green Transitions project offers a model for meaningful youth engagement in environmental policymaking. Key lessons include:

- **Meet young people where they are.** One focus group participant told us: *"If this focus group had been at the Town Hall, I probably wouldn't have gone. But because it was here at Arsenal Hub, I stayed and took part."* Engagement in schools, youth clubs, and community spaces - not council chambers - is essential.
- **Invest in sustained partnerships, not one-off consultations.** Young people want ongoing involvement. As one participant said: *"I want to be involved in a long-term project. Like in a steering group or advisory group where young people are present."*
- **Co-design communications with young people.** Traditional consultation methods (letter drops, posters) do not reach young audiences. Social media, particularly TikTok and Instagram, were identified as effective channels - but content must be developed with young people to ensure it resonates.
- **Frame climate action in terms of tangible co-benefits.** Young people were more engaged when environmental policies were framed in terms of safety, affordability, and community - not just emissions reduction.
- **Peer research builds ownership.** Our young peer researchers became effective advocates for the green transition precisely because they helped shape the research. This model could be scaled across London boroughs (as we are currently exploring in a second phase of research).

Recommendations for the Mayor and GLA

- Based on our research, we recommend the Committee consider the following for scrutiny of the Mayor's environmental priorities:

- **Develop a London-wide youth engagement strategy for environmental policy** that sets targets for young people's participation in consultations and provides guidance and resources to boroughs.
- **Pilot deliberative engagement models with young Londoners** on specific environmental challenges, building on successful examples like Islington's Climate Panel and the Rethinking Green Transitions peer research model.
- **Integrate equity considerations explicitly and holistically into environmental policy design, communications and engagement,** recognising that young people's support for the green transition is contingent on it addressing economic and social inequality. This could involve combining engagement efforts on environmental policy with efforts in relation to other policy areas such as affordable housing, which are closer to young people’s everyday concerns.
- **Commission research on barriers to young people's participation in active travel,** with particular attention to safety, bike theft, and the gendered experience of cycling - areas where TfL and the Mayor have direct policy levers.

- **Explore a GLA-supported climate education programme for schools** that builds young Londoners' understanding of local climate risks, how local government works and how to participate in local decision-making—addressing the knowledge gap our research identified.

January 2026

City of London Corporation responding to: London Assembly Environment Committee call for evidence.pdf

Introduction

The City of London Corporation is the governing body of the Square Mile, the historic and globally significant financial district at the heart of London. With over 900 years of civic leadership, we deliver services locally and champion sustainability globally. In 2020, we adopted an ambitious Climate Action Strategy, committing to creating a sustainable, responsible, and competitive City through:

- Achieve net zero in our own operations by 2027 and across our full value chain by 2040.
- Support the Square Mile to reach net zero by 2040, a decade ahead of national targets.
- Build climate resilience into our buildings, public spaces, and infrastructure.

The Strategy is supported by £68 million over six years, beyond business as usual, and integrates science-based targets, climate resilience planning, and circular economy principles. Regular monitoring of over 70 KPIs is publicly reported on our Climate Action Performance Dashboard.

The City Corporation's role extends beyond its local authority and local planning authority responsibilities for the Square Mile. Among these, the City Corporation is also the Port Health Authority for the Port of London. Outside of its public duties, the City Corporation is the sole trustee of eight Natural Environment Charities responsible for the management of over 11,000 acres of open spaces including 58,000 ancient trees, six Sites of Special Scientific Interest ("SSSIs") and three National Nature Reserves ("NNRs") across London and the Home Counties. The Natural Environment Charities were generally established to preserve various open space land in and around London in perpetuity for the recreation and enjoyment of the public. In many cases, the City Corporation as trustee is obliged to preserve the natural aspect of the open space. The Natural Environment Charities which cover Greater London include; Epping Forest, Coulsdon and Other Commons, and West Wickham Common and Spring Park Wood, Hampstead Heath, Highgate Wood and Queen's Park, and West Ham Park.

Below, we outline our progress and that we see across the City of London, barriers, lessons learned, and overlooked topics across the priority areas.

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1. Air Quality

Progress and lessons learned:

- The City Corporation has a long-standing Air Quality Strategy, most recently updated for the 2025–2030 period, which reflects progress already made, responds to emerging evidence, and goes beyond national requirements by setting out a clear pathway towards meeting the WHO 2021 air quality guidelines.
- Air quality across the Square Mile has improved markedly, with nitrogen dioxide (NO_2) and fine particulates (PM_{10}) concentrations falling by 40% between 2019 and 2024, with

national standards for fine particulates and very fine particulates ($PM_{2.5}$) currently being met Square Mile-wide. 95% of NO_2 monitoring sites met the national standard in 2024 and $PM_{2.5}$ levels already meet the GLA's 2030 ambition (Air Quality Annual Status Report 2024). Our local air quality gains are being reinforced by pan-London measures such as the ULEZ and the transition to zero-emission buses and taxis. This demonstrates that London-wide and cross-boundary action is essential, as air pollution does not respect local boundaries. Ambitious local measures are most effective when supported by wider initiatives, and benefits realised collectively, underlining the importance of clear, ambitious policy to drive sustained action and long-term improvement.

- Air quality has been supported by a reduction in travel related pollution, as active travel has become the dominant mode at peak times, with walking, wheeling and cycling accounting for 85% of on-street journeys, supported by 514m of new cycle lanes and 1,103m of pavement widening delivered between 2023 and 2025 (Transport Strategy Annual Report). This demonstrates the critical role of sustained investment in high-quality walking and cycling infrastructure in enabling behaviour change and delivering measurable air quality benefits.
- Air quality progress is underpinned by a strong evidence base, with air quality monitored at over 80 locations across the Square Mile and further strengthened in 2025 through the addition of a new AURN site established in partnership with the Environment Agency. Data is fundamental for knowledge and targeted interventions, and impact measurement.
- There has been a significant shift in the dominant sources of pollution in the Square Mile, with road transport becoming less significant and commercial heat and power emerging as the primary contributor of NO_x, alongside commercial cooking emissions as a growing source of $PM_{2.5}$. This marks a change from the long-standing focus on transport and requires a renewed policy focus, new ways of working, and different approaches to engagement, particularly with businesses and commercial operators, to address these sources effectively.
- Alongside outdoor air quality, targeted work has begun to address indoor exposure, including a community-led pilot in 2025 in collaboration with the London Borough of Hackney (see case study below). This approach provides tailored, locally relevant information, which has seen increased engagement compared to generic advice. Focusing on issues within residents' own spaces encourages deeper understanding, stronger interest, and greater retention of findings, and can stimulate exploration of related topics such as outdoor air quality. Evidence from the pilot indicates that locally grounded, hands-on engagement supports lasting knowledge and behaviour change.

Case study

The City Corporation partnered with the London Borough of Hackney and MP Smarter Travel to deliver an indoor air quality project for residents. 20 residents across Hackney and the City of London received air quality monitors to use in their homes for two weeks, learning about indoor air pollution and practical ways to improve it. Each participant received a £20 voucher as a thank-you.

During the project, residents followed their usual routines while monitoring indoor air pollution, then repeated activities after taking simple steps to improve air quality. Key findings included:

- **Ventilation is crucial:** 90% of participants reported better air quality when they opened windows and used extractor fans, especially during cooking, cleaning and overnight.
- **Cooking impacts air quality:** gas hobs can significantly increase levels of air pollution, particular $PM_{2.5}$, TVOCs and CO_2.
- **Product choices matter:** air fresheners, spray cleaners and hair sprays were all linked to poorer indoor air quality.
- **Maintenance and equipment help:** regular maintenance and using tools like extractor fans, dehumidifiers and air purifiers can make a noticeable improvement to indoor air quality.

One participant saw a 70% improvement in TVOC readings after increasing ventilation when cleaning a pet's litter tray, demonstrating how small, practical changes can have a meaningful impact on the air we breathe.

The project significantly boosted awareness and knowledge of indoor air quality, with the proportion of participants reporting 'no understanding' or 'uncertainty' falling from 45% before the project to 0% afterwards, and those reporting a 'full understanding' rising by 8%.

Barriers

- A significant proportion of pollution measured within the Square Mile originates from outside the boundaries, highlighting that regional and London-wide coordination is essential. Local action alone cannot fully address air quality, making collaboration across boroughs critical for meaningful improvements. Targeted measures in areas with the poorest air quality could provide mutual benefits across boroughs, ensuring interventions are both effective locally and supportive regionally.
- Zero tailpipe emission vehicles emit particulate pollution, the understanding of which is still limited, highlighting the need for further research and targeted action to address all sources of particulates effectively. Additionally, placing greater emphasis and benefits on active travel modes such as walking, cycling, and wheeling will have a greater impact on improving air quality than solely focusing on transitioning to low-emission vehicles.
- Current regulatory powers are limited for controlling emissions from non-transport sources, which constrains the ability to enforce standards across all contributors to poor air quality. This highlights the need for enhanced regulatory frameworks and

stronger mechanisms to manage industrial, commercial, and domestic sources effectively.

- Achieving behavioural change (such as encouraging cycling or public transport, reducing engine idling, and discouraging private car and freight use) requires long-term investment, infrastructure improvements, and sustained incentives, as changing travel habits take time to embed. Without consistent support, progress can be slow and uneven. Addressing these challenges effectively requires adequate resources, highlighting the need for increased finance and capacity, particularly in the engagement space for behaviour change. Wider campaigns led by the GLA, which local authorities can contribute to and help distribute, could support and strengthen local efforts.

Overlooked Topics:

- Uncertainty over the effectiveness of vehicle retrofit to meet ULEZ standards, particularly for buses and coaches. The national Bus Retrofit Programme was paused and then discontinued due to new evidence suggesting that real-world emission reductions from vehicle retrofits were lower than expected. There are potentially vehicles in the Square Mile that emit higher levels of pollution than their Euro class, even though they are classed as meeting the Euro VI emission standard.

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2. Noise

Progress and lessons learned:

- Noise management in the City has been strengthened through the City Noise Strategy (2016-2026), which has introduced a strategic approach to soundscape management for the first time. A recent social survey has shown evidence of progress, with improved public perception of sound in the Square Mile, and a year-on-year reduction in noise complaints over the life of the strategy. This progress in managing noise in the Square Mile has been achieved through:
    - The City of London providing a dedicated noise response service to investigate and resolve justifiable noise complaints, including a 24-hour rapid response service for cases requiring urgent action.
    - The Pollution Control Team's early engagement in the planning process, providing advice at the pre-application stage to promote good acoustic design in new developments, reduce noise from servicing and plant, and ensure building layouts and screening measures - protecting residents from internal noise transmission and external noise.
    - Proactive management of construction noise through our Pollution Control Team's Code of Practice for Deconstruction and Construction Sites (9th Edition), using early engagement and effective liaison to ensure sites apply 'best practicable means', minimise adverse environmental impacts, and reduce complaints.
- This progress demonstrates that clear policy frameworks, early intervention, and consistent enforcement are effective in managing noise impacts. A proactive approach is the most effective intervention rather than a reactive approach which rarely offers resolve nor is a good use of resource.

Barriers:

- Constraints on local authority Environmental Health funding across London affect the capacity to provide responsive services, proactive engagement, and sustained noise mitigation activity, which in turn can slow progress on managing noise impacts effectively. Further funding would support accelerated and sustained action.

Overlooked Topics:

- Environmental noise and public health impacts remain under-recognised in complex urban environments, where noise exposure is often treated primarily as an issue of nuisance or amenity rather than a contributor to wider and well-evidenced health effects, as highlighted by the World Health Organization.
- Transport-related noise, including from the London Underground, continues to be one of the most predominant sources of noise exposure in the Square Mile, where progress on mitigation is often dependent on TfL funding priorities and willingness to invest, limiting the ability to deliver consistent improvements locally. Transport noise continues to receive limited strategic focus and funding, with insufficient prioritisation at a London-wide level, including within TfL investment programmes and wider GLA noise strategies.
- Noise issues for Square Mile communities include uncontrolled busking and transboundary riparian activities including party boats. They present growing challenges for communities and are increasingly difficult to manage through existing regulatory and enforcement frameworks, highlighting the need for clearer governance and cross-authority coordination.

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3. Improving Biodiversity and Protecting and Enhancing Blue and Green Spaces

Progress:

- We manage over 11,000 acres of green space across London and southeast England (through the eight Natural Environment Charities) and over 180 smaller sites in the Square Mile. They include a variety of critically important wildlife habitats, Special Areas of Conservation, Sites of Special Scientific Interest, and National Nature Reserves. Together, they capture over 16,000 tonnes of carbon annually and support biodiversity across London and the green belt.
- In the Square Mile we have enhanced 17,200m^2 of public realm and open space, through introducing climate resilient and biodiverse landscaping, SuDS, and 186 trees since 2021.
- Our Biodiversity Action Plan (BAP) concludes in 2026 and has provided four key action plans for the Square Mile; Open Spaces and Habitat Management, the Built Environment, Education and Community Engagement, and Data Collection, Surveys and Monitoring. These action plans have worked to deliver the BAP's 21 actions. This includes adoption of guidance for pollinators, supporting and partnering to improve data collection and supporting other strategic and policy outcomes.

- Our emerging City Plan 2040 sets out strategic priority 1.4 Environmental objective which references delivering urban greening and greater biodiversity. This is then outlined in further detail in the following Strategic Policies; S12 Open Spaces and Green Infrastructure, and S15 Climate Resilience. These provide a series of specific policies to conserve biodiversity and secure improvements including our aim to go beyond national Biodiversity Net Gain (BNG) requirements by setting a local target of 3 Biodiversity Units per hectare for major developments. This will support biodiversity by ensuring measurable uplifts even where statutory exemptions apply. The potential changes to the National Planning Policy Framework (NPPF) set out in the Government's December 2025 consultation could impact our ability to require more than the statutory 10%, as well as narrow the scope of qualifying developments.
- Further details on how to secure biodiversity through development has been set out in the adopted Planning for Sustainability Supplementary Planning Document (SPD), in chapters on Urban Greening and Biodiversity and Climate Resilience.
- The Natural Environment Epping Forest Charity was successful in securing Government funded Higher Tier Countryside Stewardship Schemes (CSS) to support on major habitat restoration projects, which commenced in 2020 and will run until 2033. For Epping Forest the total grant amount is approximately £4.3M, which enables wood pasture, grassland, heathland restoration and management, supporting obligations such as improving the condition of the SSSI. These grants are critical for long-term nature restoration delivery.
- The Natural Environment Charities covering North London Open Spaces (Hampstead Heath, Highgate Wood and Queens Park, and West Ham Park) and, Coulsdon and Other Commons, and West Wickham Common and Spring Park Wood have prepared individual 10-year management plans with biodiversity and heritage aims alongside providing benefits to the community in terms of recreation and access. Climate resilience is a key part of all the management plans.
- In 2021 an Epping Forest Strategic Access Management and Monitoring ("SAMM") Strategy was developed due to legislation protecting the SAC from adverse effects from development (recreation/visitor pressure). Due to the impact of development pressure on the SAC, a list of measures were developed to mitigate the effects of current and predicted future growth in visitors on the Forest. The Strategy was agreed by Natural England and local authorities, with financial contributions secured from all relevant development over an 80-year period. Mitigation measures include management of surfaced and unsurfaced paths and tracks, signage, maps and interpretation boards, visitor engagement campaigns, SAMM Strategy employees, visitor surveys, ecological monitoring surveys, and management of three key hub sites.
- Plans, strategies and programmes of work continue to develop and will seek to align with the London Local Nature Recovery Strategy (LNRS) when adopted and other key frameworks such as the London Green Infrastructure Framework (LGIF) and London Urban Forest Partnership (LUFP) including ensuring continuity between habitats and species priorities with neighbouring boroughs and across London. City of London Corporation officers from across multiple departments have provided input into the LNRS.
- Partnerships with charities, community groups and academic bodies have supported a range of projects. This includes:

- Extensive monitoring of pollinator habitats and species delivered by Pollinating London Together.
- Research into the use of Passive Acoustic Monitoring to measure the impact of green infrastructure on species, and how these insights could be utilised to develop policy approaches, delivered by Imperial College London.
- Community groups managing sites for biodiversity, securing funds for projects including two Rewild London grants, including Friends of City Gardens and Barbican Wildlife Group.

Barriers:

- Space constraints in the Square Mile limit large-scale greening. The dense urban environment restricts opportunities for significant planting or habitat creation, while underground utilities and other infrastructure further complicate projects such as tree planting and Sustainable Drainage Systems (SuDS). These physical limitations require creative, targeted approaches to maximise biodiversity benefits within a constrained space.
- Fragmentation and resilience pressures. Existing green and blue assets in the Square Mile are small, fragmented and intensively used, which makes it challenging to enhance ecological value while maintaining other co-benefits such as flood management, cooling, and public amenity. Other pressures include emerging pests and diseases, which in dense urban centres could impact management practices and species selection, reducing the resilience of these habitats over time.
- Difficulty quantifying and monitoring biodiversity. In a dense urban environment, a wide range of factors influence outcomes for habitats and species, making it challenging to set clear targets or measure progress of interventions. Collecting and verifying data is often time- and resource-intensive, which limits the ability to attribute ecological improvements to specific projects or demonstrate the effectiveness of interventions. Expanding citizen science initiatives and community-led monitoring could help fill data gaps, increase coverage, and support engagement while improving evidence for decision-making.
- The Natural Environment Charities open spaces outside of the Square Mile, provide benefits and ecosystem services to London and the Home Counties. These green spaces face a range of pressures, including visitor pressure/recreational disturbance, air quality/pollution, climate change, emerging pests and diseases and existing invasive non-native species (INNS), wildfires, and where relevant development pressures. Conservation and land management practices of these open spaces requires considerable resource and budget to maintain and enhance these spaces to a favourable condition. Funding would support the Natural Environment Charities open spaces to effectively and proactively manage these risks.
- Concerns from the Natural Environment Charities on The Planning and Infrastructure Act 2025 exist regarding potential adverse impacts on the Charities statutory designated sites due to Part 3 of the Act. Part 3 introduced a new approach to addressing environmental impacts through Environmental Delivery Plans (EDPs) and the Nature Restoration Fund (NRF). In areas covered by an EDP, developers will no longer be required to comply with the specified elements of the Habitats Regulations 2017, instead paying into the NRF, with Natural England responsible for delivering strategic

compensation and nature recovery elsewhere. Concerns exist around a reduction in the level of environmental protection on these site's habitats and species. Next step will be to review the potential of the NRF.

Lessons Learned:

- Early engagement with developers secures outcomes for biodiversity including Biodiversity Net Gain (BNG), Urban Greening Factor (UGF) and other ecological measures. Engagement is most effective when incorporated at the earliest stages - initiating discussions at the pre-application stage .
- Partnerships with pan-London groups amplify impact and knowledge sharing and support more coherent, strategic, and resilient biodiversity outcomes across London. The London Borough's Biodiversity Forum, London Urban Forest Partnership and other groups are important to knowledge sharing and research development.
- Significant grant funding is required to undertake wider nature restoration across the Natural Environment Charities, e.g. Government funded CSS.

Overlooked Topics:

- Soil health and soil biodiversity require further attention, raising their profile through specific projects and monitoring efforts, to better understand their value to habitats, species and resilience.
- Access to nature whilst managing adverse effects from recreational disturbance on biodiversity.
- Biosecurity. A wider London policy on this as well as the management of emerging pests and diseases and invasive non-native species.
- Monitoring of restored habitats and nature recovery selected sites. How will this be undertaken long-term, what management and monitoring plan will be prepared, who will undertake this work and how will it be funded? How is success being measured?
- Wider water catchment management, water quality and natural flood management. Many water-related challenges and solutions extend beyond boundaries, including flood mitigation, water quality improvements, and catchment-scale Sustainable Drainage Systems (SuDS). Coordinated management across jurisdictions is essential to maximise ecological, hydrological, and community benefits.
- Green finance and nature market opportunities.

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4. Greenhouse Gas Emissions and Reducing Energy Use

Progress and lessons learned:

- The City Corporation has an ambitious Climate Action Strategy with a target to support the Square Mile to achieve net zero b 2040 – a decade ahead of national targets. Square Mile carbon emissions reduced by 24% from 2017 to 2022 (243 ktCO2e reduction) (the latest data). (Progress Report 2025). For progress it's essential to have policy direction to support ambitious delivery at the local level, as other policy work such as planning can take direction from this - and embed change, and to have funding to deliver this.

- Transparent reporting via the City Corporation's interactive Climate Action Performance Dashboard provides accessible, open-source data on local emissions and their sources, enabling stakeholders to understand the Square Mile's progress and take informed action. Making data visible and localised helps to raise awareness, build trust, and drive accountability, while also supporting engagement activities.
- Progress in reducing greenhouse gas emissions in the Square Mile has been supported by a series of strategic planning initiatives. Planning guidance has been tightened to centre sustainability, including the introduction of embodied carbon benchmarks and a "Retrofit First" approach through the Sustainable Planning Supplementary Planning Document (SPD), helping to reduce the embodied carbon of new and existing buildings. To support developers in meeting these expectations, the City Corporation has adopted a Carbon Options Guidance Planning Advice Note, encouraging applicants to carry out a pre-application "optioneering" exercise to consider different development types such as retrofit, partial retention and substantial redevelopment for their site before the detailed design stage commences, enabling proposals to be assessed with carbon impact in mind.
- In 2023 the City Corporation published a Square Mile Local Area Energy Plan (LAEP) – which sets our approach to a net zero carbon energy system in the Square Mile by 2040. The LAEP prioritises building efficiency, heat networks, and renewable electricity generation. Having this strategic plan in place provides a coordinated framework for interventions and ensures property-level actions contribute to wider city-wide carbon reduction goals. Engagement with commercial buildings is essential to embedding and progressing with the LAEP, resource is required for effective engagement.

- Progress in reducing greenhouse gas emissions in the Square Mile has been supported by targeted engagement and support for Small and Medium sized enterprises (SMEs), which make up over 90% of local businesses. Many SMEs lack dedicated sustainability teams or regulatory drivers to reduce emissions, meaning tailored guidance, resources, and practical support are essential to help them take meaningful action. Large businesses embedding sustainability requirements in tender processes has helped drive the transition with SMEs, demonstrating the value of collaboration across the supply chain. To ensure a just transition, however, it is important that SMEs have access to the guidance and support needed to act, and that engagement begins early. Sector-specific approaches remain critical to address more complex or hard-to-tackle emissions challenges and embed lasting change.

Case study

The City Corporation provided £800,000 four year funding for an-depth climate course for Square Mile SMEs, delivered by Heart of the City (HotC), a responsible business charity empowering SMEs to be a force for good.

The course covered key net zero terminology, the business case for climate action, measuring a carbon footprint, and creating a practical net zero action plan. SMEs received hands-on support through workshops and surgery sessions, with access to experts from large businesses to guide them through challenges and opportunities.

The course was a great success: over the four years, 46 events and 260 1-1 sessions provided tailored support to 217 City-based SMEs. 120 organisations graduated the full course, and when these graduates collectively achieve net zero by 2040, their projected science-aligned emissions reductions will be over 177 ktCO2e – equivalent to a city the size of Bath.

DENTON, a City-based office design and fit-out SME who graduated in 2024, said: “The comprehensive support empowered us to address several Scope 3 categories and to formulate a tailored, business-specific Carbon Reduction Plan. The workshops proved particularly valuable, offering both practical tools and relevant knowledge. They reassured us that shared challenges can be overcome through collaborative learning and focused action. This gave us the confidence to strengthen our sustainability efforts and meet key milestones. We’re actively working in alignment with the Carbon Reduction Plan. Many targets have already been achieved, while others are in development. We’re grateful for the opportunity and truly appreciate the ongoing support.”

- In November 2020, the City Corporation signed a 15-year Power Purchase Agreement with Voltalia for all electricity from a new 95,000-panel solar farm in Dorset. This pioneering deal enabled the facility’s construction, saving the City Corporation about £13 million in energy costs and 74 ktCO2e, and became operational in January 2023. Beyond the City Corporation’s direct impact, this project demonstrates a replicable model for long-term renewable energy procurement that other local authorities could adopt to support their own decarbonisation goals. Sharing lessons learned, guidance, and best practice through London-wide networks or GLA-led initiatives could accelerate uptake and strengthen the capital’s collective contribution to the UK’s green energy transition.

- The City Corporation co-launched the Transition Finance Council (TFC) with HMG in 2025, following the recommendations of the Transition Finance Market Review, to leverage the UK's existing strengths to make it a leading centre for raising credible transition capital, and for investing and obtaining financial and professional services in support of UK and global net zero ambitions. The TFC is now developing a set of Transition Finance Guidelines aimed at investors, as well as hard to abate sector-specific guidance for transition plans, helping organisations navigate complex decarbonisation pathways. Sector-tailored guidance is essential for driving meaningful and accelerated transitions, and highlights the value of collaborative finance mechanisms and cross-city coordination to accelerate emissions reductions in challenging sectors.

Barriers:

- The slow decarbonisation of the UK electricity grid remains a significant barrier; while energy efficiency is essential, achieving deep emissions reductions ultimately depends on greening energy supply. Greater use of demand-side response, storage and flexibility could help balance renewable generation and consumption, but implementation is constrained in dense urban environments where space is limited and commercial buildings face competing priorities. Further London-wide research, guidance and promotion could help unlock progress in this area.
- Lack of alignment and certainty in national regulation holds us up action: potential conflicts between Minimum Energy Efficiency Standards (MEES) and Heat Network Regulations prevent timely investment in decarbonisation. In order to comply with expected MEES and ensure an EPC B minimum by 2030, building heat must be decarbonised – either through heat pumps or connection to a heat network. The delays to Heat Network Regulations setting out certainty of what will be required when, means that many asset owners are investing in more certain approaches (e.g. air source heat pumps) and missing out on the low-cost, low-carbon opportunities heat networks present, and in turn making heat networks more expensive and challenging to deploy.
- The lag of city-wide emissions and energy data, including London's Energy and Greenhouse Gas Inventory (LEGGI), make it difficult to understand which initiatives are delivering the greatest impact. This limits the ability to target resources effectively, and highlights the ongoing challenge of measuring impact robustly at a city or borough scale.
- An emerging area of concern is the rapid growth of AI and data centres, which are highly energy-intensive and could significantly increase electricity demand. This underscores the importance of accelerating grid decarbonisation. At the same time, these facilities present a potential opportunity, as waste heat from data centres could be harnessed to support local heat networks, providing a practical solution to integrate high-demand users into city-wide decarbonisation planning.

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5. Waste and the Circular Economy

Progress and lessons learned:

- The City Corporation launched our Circular Economy Framework January 2025 outlining our ambitions to transition to a circular economy in line with our net zero commitments. The framework focuses on the key areas of the built environment, procurement and

supply chain, capital projects, waste and resources, food and drink, and training and engagement. Focus for 2025 has centred around awareness raising and data baselining.

- The City Corporation has embedded circular economy principles into planning through our Sustainability SPD, prioritising reuse and retrofit. The emerging City Plan 2040 also outlines a retrofit first approach. There is need to embed frameworks within existing structures and policies to ensure implementation and compliance.
- The City Corporation is a key partner in the construction industry circular economy pilot Romulus. Which aims to bring stakeholders from across the industry together to collaborate on solving issues and remove barriers to increase reuse within the industry. 2026 will be the second year of the pilot and will conclude at the end of the year.
- Clear guidance and procurement standards drive adoption of circular principles in development projects. Setting expectations early through planning and procurement processes helps embed waste reduction, reuse, and material efficiency, driving more consistent and scalable outcomes.
- Grant funding has supported the delivery of a Library of Things at Barbican Library, introducing the sharing economy to residents and encouraging repair and reuse. Resident consultation is informing the offer, ensuring it responds to local needs and priorities. Building on familiar initiatives and campaigns has supported engagement, while co-design has strengthened buy-in and driven uptake, demonstrating the value of participatory approaches to behaviour change.
- Communication, engagement and education of our resident and business communities remains a priority with a large number of events run such as: Give and Take days, repair workshops, webinars, panel discussions and best practice meetings. These initiatives help normalise reuse and circular behaviours, reinforcing practical action alongside policy measures.
- A full review has been carried out of the City Corporation's waste processes and a dedicated resource has been allocated to delivering compliance with Simpler Recycling legislation and driving best practice across the corporate estate. Site-by-site reviews are producing tailored recommendation reports, empowering local teams to reduce waste, increase recycling, and improve understanding of waste flows. Given the diversity of sites and waste streams, a localised and tailored approach is essential to identify effective solutions - an approach that could be applied more widely across London.

Barriers:

- Limited influence over commercial tenants' waste streams and construction waste practices. Limited data visibility of borough wide commercial waste streams and volume, which makes up the majority of Square Mile waste.
- There are challenges with "flat above shop" style properties to deliver food waste collection services due to limited space, no off-street storage and high footfall areas. Alternative solutions are being trialled.
- Limited transparency of the downstream waste chain makes it hard to track, verify, and manage where waste actually ends up. beyond first tier suppliers.
- A lack of standardised recycling streams and bin systems nationally continues to cause confusion. While Simpler Recycling legislation is a positive step forward, legacy

inconsistencies mean significant behaviour change and communication are still required. Ongoing education and upskilling are needed to improve understanding of what can and cannot be recycled, reduce contamination, and support effective participation across households and businesses.

- The decision to discontinue Reduction and Recycling Plans (RRPs) creates uncertainty around how a cohesive, consistent approach to waste reduction and circular economy principles will be driven across London. Clearer strategic direction, central coordination from the GLA would help align borough activity and accelerate progress.

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6. Adapting London to the Impacts of Climate Change

Progress:

- The City Corporation conducted climate risk assessments aligned with UKCP18 projections, identifying priority climate risks for the Square Mile and City Corporation, including heat, flooding, and biodiversity impacts. These assessments provide a strong evidence base to prioritise interventions, inform planning decisions, and ensure that both current and future climate risks are considered.
- We have delivered a Cool Streets and Greening Programme, implementing climate-resilient planting and Sustainable Drainage Systems (SuDS) across the Square Mile, aiming to mitigate the Urban Heat Island effect and manage surface water to reduce flood risk. Through monitoring of the programme we have found street trees can reduce street level temperatures by up to 6°C. Beyond the physical benefits, the programme improves public amenity, supports biodiversity, and provides visible, community-facing examples of climate adaptation in action (Cool Streets and Greening progress report).
- The City Corporation have integrated climate adaptation into planning policies, with measures embedded in the Local Plan 2015 and the emerging City Plan 2040. These policies require that all major developments consider climate resilience from the outset, including flood risk mitigation and SuDS, helping to ensure that new buildings and public spaces are designed to withstand current and future climate conditions.
- The City Corporation published guidance to support resilience in projects and design, including advice on resilient planting, material choices, and adaptation measures. These resources provide practical support for developers, architects, and project teams to select features suited to the Square Mile's evolving climate, helping translate policy into actionable, evidence-based interventions.
- Created a digital twin of our corporate assets to understand climate risks and prioritise interventions. Visual tools are useful tools to drive engagement and understating with stakeholders.
- The City Corporation created a digital twin of our corporate assets to understand climate risks and prioritise interventions. This visual tool allows decision-makers and stakeholders to explore vulnerabilities interactively, supports risk-informed investment decisions, and enhances engagement by making complex climate data accessible and actionable.

- The City Corporation created a digital twin our corporate assets to understand climate risks and prioritise interventions. This visual tool allows stakeholders to explore vulnerabilities interactively, supports risk-informed investment decisions, and enhances engagement by making complex climate data accessible and actionable. By presenting complex climate information visually, stakeholders can more easily interpret and understand risks, which helps drive informed action and supports wider awareness and collaboration across teams and partners.

Lessons Learned:

- Adaptation pathways help manage uncertainty and avoid maladaptation. These pathways can also form the foundation of a monitoring and evaluation framework, ensuring adaptation measures remain responsive and evidence-based.
- Mainstreaming resilience into all decision-making prevents costly retrofits later. Embedding climate adaptation considerations across planning, development, and operational processes ensures that new projects are designed to withstand current and future risks. Early integration reduces the need for expensive, reactive adjustments and increases the long-term effectiveness of resilience measures.
- Geological surveys can help overcome technical barriers to adaptation. In dense urban environments, understanding ground conditions is critical to the successful implementation of solutions such as Sustainable Drainage Systems (SuDS). Using detailed geological data, can help identify suitable sites, optimise designs, and increase the feasibility and impact of adaptation interventions.

Barriers:

- Retrofitting resilience measures in heritage assets and congested urban streets remains challenging due to physical constraints, technical complexity, and high costs, which can limit the scale and speed of interventions. Funding channelled into this area could support and accelerate action.
- Defining and measuring resilience is inherently complex, spanning infrastructure, ecosystems, public health, and finance. Without a shared and measurable vision of resilience, adaptation efforts risk being reactive rather than transformative, making it difficult to prioritise actions or assess progress. Creating and aligning a vision and definition across London, as recommended in the London Climate Resilience Review, would help address this gap.
- Accessing finance for adaptation continues to be a barrier due to market unfamiliarity, issues of scalability, attribution of benefit and value from interventions. While funding may be available for large-scale projects, smaller-scale or locally tailored interventions often lack support, limiting their delivery and impact.
- Coordination across multiple jurisdictions is essential, as many climate impacts (such as drought) and solutions (for example, catchment-scale Sustainable Drainage Systems) extend beyond the boundaries of a single local authority. Lack of aligned governance can slow delivery and reduce the effectiveness of interventions.
- Complexity of climate risk to human health, habitats, species and landscapes and the drivers of risks, including risks from invasive non-native species, plant pathogens, vectors and emerging diseases add further uncertainty, requiring specialist knowledge

and multi-disciplinary approaches to identify and manage risks effectively. This can be resource intensive and slow delivery.

Overlooked Topics:

- Social resilience and community preparedness more generally and specifically for extreme weather events need stronger focus. While physical and infrastructure measures are often prioritised, the ability of communities to anticipate, respond to, and recover from shocks is equally critical. Strengthening awareness, engagement, and planning for community-level resilience can reduce harm, improve recovery, and support longer-term adaptive capacity.
- Transference risks where a climate impact to a community causes such an increase in demand to other communities/organisations that they in turn are overwhelmed without directly being impacted. Recognising and planning for these cascading effects is essential to ensure that adaptation strategies are robust and equitable across interconnected communities.

Closing Statement

The City of London Corporation remains committed to bold climate action and collaboration. While progress is significant, systemic challenges - such as supply chain emissions and space constraints - require continued innovation and partnership. We welcome the opportunity to share insights and work with the London Assembly to accelerate delivery across these priorities.

January 2026

Introduction

Mums for Lungs was established in Brixton, London in 2017, when a number of us were on parental leave. We became aware of the toxic levels of air pollution on the UK's streets while walking around with our babies, and decided we wanted to do something about it. We raise awareness of the health impacts of air pollution and champion effective solutions for tackling it.

As a network of on the ground campaigners in London on clean air and children's health we would identify key areas where the Mayor is failing to take the opportunity to meet the stated outcomes in the Cleaning London's Air Delivery Plan, and where further scrutiny and action is needed.

Despite recent announcements that London was now meeting legal limits, we all know of course that this is not actually true: 38 local diffusion tube NO2 across London are still exceeding legal levels, as well 3 of the real-time monitors on the LondonAir system. Air pollution in London remains far too high and the progress made with the delivery of the ULEZ is now stalling on both NO2 and of course the most harmful of all pollutants: PM2.5 (particle pollution).

Domestic Wood Burning

The London Environment Strategy acknowledges that wood burning must be addressed to bring down PM2.5 and PM10 emissions. Similarly, nearly a decade ago, the Mayor committed to achieving a target for PM2.5 under the 'Breathe Life' campaign and acknowledged that wood burning would be required to achieve this. However, despite this strong commitment at the time, there has been no action plan whatsoever to ensure that annual PM2.5 levels would be below 10mg/m3. Indeed, several monitors across London are showing increases year on year, others are hovering close or well above the target that the Mayor has committed too.

The latest LAIE data found that 15.4% of PM2.5 emissions, and 6.4% of PM10 emissions, originate from wood burning - making it the largest single source of PM2.5. Mums for Lungs' recent investigation into enforcement data reveals that the current regulatory framework for domestic wood burning is wholly inadequate. Across England, residents made 15,195 complaints about harmful wood smoke, yet enforcement action is virtually non-existent. In London alone, 1,847 complaints were recorded — and just one fine was issued. In fact, the GLA has trained more local officers to enforce wood burning contraventions than fines have been issued – indicating that the system is unfit to serve its purpose.

One of our volunteers recently received this extraordinary response from her borough after reporting wood smoke entering her home and harming her family's health: "Unfortunately, because many of the original designation orders date back to the 1950s and 60s, we are not in a position to issue fines for chimney smoke. The lack of clarity from not having the original designations makes enforcement difficult and opens us up to legal challenges that we might not be able to defend... If you wish to pursue your own

independent legal action, Section 82 of the Environmental Protection Act 1990 provides a legal framework for anyone to seek redress through the magistrates' court. You do not need a solicitor, although this depends on your confidence in handling the process yourself."

Expecting individuals to take legal action against their neighbours neither protects families nor delivers clean air for London's children.
While awareness campaigns run by some London boroughs, and the work of the London Wood Burning Project, are commendable, a much bigger impact could be had through Mayoral leadership. The Mayor has a clear opportunity to act by launching a strong, **London-wide wood-burning awareness campaign** and by using his voice to lobby for **meaningful national reform** on behalf of all Londoners.

School Streets
Good progress has been made in rolling out School Streets across London, but significant inconsistencies remain between boroughs. While some boroughs are working towards implementing School Streets at all suitable schools, others have no plans to deliver them at pace.
School Streets are a proven intervention for improving children's health, particularly by reducing exposure to air pollution at some of the most polluted times of the day. Given their effectiveness in improving air quality and encouraging healthier travel behaviours, it is a missed opportunity that the London Environment Strategy does not explicitly reference School Streets or recognise their critical role in delivering cleaner air and behaviour change.
We believe the committee should be examining what powers and levers, including financial ones, the Mayor and TfL have to drive a more consistent, London-wide and strategic approach to the implementation of School Streets, ensuring that all of London's children benefit from cleaner air and healthier journeys to school

Traffic and transport
The London Environment Strategy identifies a modal shift to walking, cycling and public transport as one of the most effective ways to reduce PM2.5 and PM10. Yet, despite road transport remaining the largest source of nitrogen dioxide and a major contributor to PM2.5, there has been no increase in sustainable mode share since 2016. Progress has also stalled across other key indicators in the Mayor's Transport Strategy, including bus speeds and levels of physical activity.
Similarly, the Mayor's Net Zero Carbon Pathway concludes that a 27% reduction in car kilometres is required to meet London's Net Zero target. However, traffic volumes have been rising steadily since 2020, moving London further away from this goal rather than closer to it.
Given this lack of progress, how does the Mayor plan to deliver the required 27% reduction in car kilometres and reverse the current upward trend in traffic?

Thank you for considering our submission, and we are always available to discuss these and other issues related to air pollution in any suitable forum.
Jemima Hartshorn
Founder and Director Mums for Lungs

London's Environment: progress on priorities

January 2026

Improving biodiversity and protecting and enhancing blue and green spaces

Food gardens are biodiversity hotspots, and in recent years the awareness of nature-friendly food growing has become widespread. However, food production is still often seen as separate or in opposition to biodiversity, especially in policy spaces.

Engaging food growers networks in LNRS

Examples of progress

The GLA's LNRS programme commissioned Capital Growth to take part in their London biodiversity baseline study, with a focus on urban food growing and peri-urban farming. This resulted in some very interesting findings, laid out in the **2024 Growing for Nature report,** where we discovered urban food gardens are providing exceptional habitats and forage including pollinator-friendly planting, compost heaps, various hibernacula and ponds. And almost none are using pesticides or herbicides.

One of our members, the Energy Garden, a network of public-facing growing sites on TfL platforms and National Rail owned-land have put considerable resource into biodiversity enhancements over the last 2 years. They have been measuring and testing biodiversity indicators and been leading many biodiversity interventions. As a result they have increased biodiversity by 39% across their extensive network of gardens. Further proof that community gardening and food growing, can be a big boost for biodiversity in the city. Read their report here

Barriers to progress

Lack of long-term strategy, coordination and resources – would like to see the LNRS expand to include and connect food growing networks with local ecology/biodiversity officers and include their spaces/work in plans. There is also need for funding to support the people that deliver the work on the ground. Capital Growth has the potential to coordinate London-wide integration of LNRS in food growing spaces and is keen to be included.

Limited skills and training – there is considerable enthusiasm for creating more habitat and supporting wildlife on food growing sites, in recognition of the importance of supporting biodiversity for it's own sake but also to benefit productivity, via soil health and natural pest management.

However, we identified a skills gap among community food growers in their ability to identify and record species. And knowledge of specific plants to grow to enable threatened species to flourish. These skills and knowledge are essential to ensure we are doing the right type of intervention and measuring it's efficacy. However, food gardens often lack the capacity to go into this kind of detail and have requested more support in this area. Capital Growth is launching a Big Bug Count campaign this spring to training and support more food growers to identify and record species. We would also like to connect food growing sites with ecology officers, academics and charities such as FrogLife, Butterfly Conservation and Bumblebee Conservation Trust to do in-depth biodiversity surveys and interventions.

Right to Grow

Right to Grow (RTG) is a key policy intervention which could enable more local residents and community growing groups to grow their own food and involve them in enhancing, maintaining and protecting green space on unused public land.

Examples of progress

Since Southwark passed the RTG in January 2025, many more councils have expressed interest in following suit, and there are a number of community-led RTG campaigns taking off around London, demonstrating a huge amount of momentum behind this concept.

Case study: Southwark - the first London borough to adopt the Right to Grow motion

Southwark Council's decision to pass this motion is a recognition of the significant role community growing plays in creating essential habitats for nature and generating immense social value and access to fresh fruit and veg. This landmark decision by Southwark Council is the culmination of four years of groundwork laid by Southwark Council's community gardening team, which set up a process in 2021 for residents on estates to set up and run growing projects with council support, which has led to 21 new gardens with 241 food growing plots with more in development. The Community Gardening officer role was established in 2020 and is the main point of contact in the council for growing enquiries, working closely with other council teams on project delivery and sharing newsletters, funding and training opportunities to residents. To support new and existing gardening groups and organisations through a Southwark network the two part-time officers organise a busy calendar of events and training, from community organising to composting; connecting individuals with projects and organisations and promoting peer-to-peer support. They're a thriving example of how even built-up inner-city boroughs can carve out pockets of land for food growing.

Barriers to progress

Council officers trying to gather support for RTG cite lack of political support as one of the key barriers to progress. More leadership from the GLA to support the RTG and encourage London councils to adopt the motion would be helpful in progressing this.

Lack of funding for centralised campaign - Capital Growth is fundraising to lead a London-wide campaign to support councils and communities to implement a Right to Grow, to accelerate the identification of available land and equip local residents to get growing and greening. We see collaboration between citizen and state a key element to success in this area and funding is required to harness the current, provide resources for councils and communities to bring about wide-spread change.

Pesticide use

Pesticide use is hampering biodiversity efforts and reducing ability to create pollinator highways. More specifically, herbicide spraying is widespread across London and reduces the volume of plants and flowers available for insects to feed on. Pesticide reduction is in the Mayors environment plan and has led to one third of councils stopping or reduced their pesticide use. However, there is a missed opportunity for GLA to take a coordinating role on this issue and provide assistance to councils to go further. PAN-UK have produced a map of London councils pesticide use which is a very helpful resource: **https://www.pan-uk.org/pesticide-use-by-london-borough**

Examples of progress

PAN-UK's recent report Playing with Poison found glyphosate in eight out of thirteens children's playgrounds. Some good news is that Hackney, which has reduced pesticide use considerably, found no pesticide residue in their playgrounds in this study. Other examples of successful implementation of pesticide bans include in Lambeth council, who worked with Incredible Edible Lambeth who led a Pesticide Free Lambeth Campaign in 2019. As a result use of glyphosate was stopped completely when new contracts were brought in by Lambeth Council in October 2021. Lambeth Council said at that time that: "part of our expectations of the new service which we have put out to tender is that bidders have to prove how they will manage invasive weed growth without glyphosate". Hackney council has reported cost savings since reducing pesticides.

Centring the people who create and manage greenspace

The people who manage green spaces and community gardens are the key to their success in creating and maintaining green spaces that are inclusive and open to all. However, there is a lack of training and career progression for community garden leaders and urban food growers. Grant programmes for community gardens are often short term and prioritise funding capital, equipment and material costs over staffing. Which can mean that greenspaces end up having to reduce assess to the public or become dormant. It also a key driver of lack of diversity and inclusion in this sector, as to work in food growing of community gardening requires a certain level of financial security to take on a job that is low paid with limited continuity and job security.

Barnet council recently led a project addressing this. It was aimed at resourcing and training community garden leaders, where they provided two years of support and funding for a Growing Leaders project.

Case Study: Barnet Training Community Food Growing Leaders

To increase the number of community food growing projects in the borough, Barnet Council identified the need for more community food growing leaders. With funding from the Barnet Public Health Prevention Fund a one-year pilot project was co-designed and implemented by the Greenspaces and Public Health teams and Incredible Edible Barnet. With £45,000 of funding, the project aimed to increase access to food growing for residents by creating four new community food growing sites and training a cohort of community food growing leaders.

Fifty-four people completed the 16-week programme, learning how to establish and run a peri-urban food growing project. The four new community food growing sites are thriving and appreciated.

The project brought together a diverse range of participants in terms of age, nationality, ethnicity, and socioeconomic status and improved health, wellbeing and community connection. It also created connections between schools and community organisations, revived underutilised community spaces, and provided a successful model for partnership working with grassroots organisations. The project has garnered attention across London, with members of the Barnet Community Food Growing Leaders programme presenting the project at a Capital Growth event in October 2024, resulting in follow-up meetings with several boroughs about the project and how this can be replicated.

The project has now secured funding for 2025 to expand the growing spaces at each of the four sites, continue the leader training, and offer drop-in community gardening sessions for all.

Other barriers to progress

Designations and protection of land – this hasn't gone far enough, and with proposed changes to the London Plan, there is a real threat to more greenspace being lost to development.

Topics or issues which have been overlooked

Training & skills gaps for grounds maintenance teams

Biodiversity interventions by community groups can be hampered by lack of cross-departmental communication and training. Anecdotal accounts from my two years leading the food growers network include multiple instances in various boroughs of residents greening efforts being destroyed by grounds maintenance teams. E.g. Residents who adopted and planted up tree pits finding their plants sprayed and killed by ground maintenance work, despite department being informed and sometimes even when signs have been put up; a parks team pulling up fruit trees freshly planted by a local women's refugee group.

To ensure community engagement and inclusion in biodiversity efforts more communication and education of ground maintenance teams is needed. A lack of skills and training has been cited by several councils parks managers, as well as private grounds maintenance companies, and is a missed opportunity to educate teams in ecology and nature-friendly land management techniques. There is a huge opportunity here to implement London-wide CPD programme aimed at increasing knowledge and skills for these teams. This would not only improve morale of staff and empower teams to work with nature and with local community groups to enhance greenspaces, but would attract new talent through more rewarding work and career progression opportunities.

Waste and the circular economy

Composting & anaerobic digestion

Both play a vital role in reducing GHG emissions and providing a free resource for local gardening and greening projects and there are huge opportunities to create circular systems for food waste by connecting the many networks of food growing sites around London with composting/AD systems.

Community composting programmes are cost-effective, and a brilliant way to inspire behaviour change, and provide free organic matter for local gardens. This can be delivered more widely with local authorities working in partnership with community organisations. Some community gardens in our network are experimenting with community-based models of closed-loop food-waste-energy systems that can provide a valuable research resource and learning

Examples of progress

Incredible Edible Lambeth's successful community compost scheme set up several composting sites around the borough, provided training and a map for residents to locate and make best use of their facilities.

Mad Leap in Polar, Tower Hamlets and Calthorpe Community Garden in Kings Cross both make their own compost and produce biogas from their anaerobic digester, creating hyper-local closed loop systems that save the site money and offer opportunities for circular waste usage for those living nearby

Barriers to progress

Across London very few other examples exist despite a lot of enthusiasm for them among food growing groups. Yet there is potential for local authorities to work in partnership with local community organisations to raise funds and pool resources to enable these schemes to work.

Barriers include:

- Lack of funds
- Lack of access to land and facilities
- Lack of local authority support and cross-departmental strategy

Contact: Rachel Dring, Capital Growth Coordinator, Sustain.
Sustain is a powerful alliance of organisations and communities working together for a better system of food, farming and fishing, and cultivating the movement for change. www.sustainweb.org

SOUTH BANK & WATERLOO sustains us

21 January 2026

Dear London Assembly Environment Committee members

Call for evidence: London's Environment - progress on priorities

South Bank and Waterloo Sustains Us partners appreciate the opportunity to contribute to the London Assembly Environment Committee's review of London's progress on key environmental and energy priorities.

South Bank and Waterloo Sustains Us is a collaborative programme that has purposely developed from the area's net zero strategy funded and supported by the Mayor of London's Future Neighbourhoods 2030 programme. Sustains Us and its programme is delivered through a core partnership of Lambeth Council, Southwark Council, South Bank Employers' Group, South Bank and Waterloo Neighbours, WeAreWaterloo BID and South Bank BID.

Sustains Us is supported by a wider network of businesses, community organisations, cultural institutions and a range of delivery partners. This pioneering model of partnership, collaboration, and delivery has allowed us to respond to the environmental priorities of one of London's most dynamic and diverse neighbourhoods. South Bank and Waterloo features prominently in the London Growth Plan, with all growth sectors reflected in its economic ecology. Sustains Us enables partners to address the green growth ambitions of net zero, innovation, adaptation and resilience, inclusion and collaboration.

Since its launch in October 2024, Sustains Us has focused on moving from ideas into delivery, supporting local and strategic projects while also building a programme of activity needed for longer term change. Sustains Us sets out a clear and ambitious vision for a fairer and greener neighbourhood, with four core programme goals:

- Clean energy and efficient buildings
- Improving air quality
- Building greater resilience to climate change
- Reducing waste and consumption

In response to the request for evidence, please see the attached Sustains Us Delivery Plan 2026-2030. This has been developed through events, workshops and local engagement. It is intended as a shared resource for residents, businesses, organisations, funders and partners.

The Delivery Plan provides transparency about priorities and supports coordination and collaboration to help turn ambition into delivery. Under each of our four core goals it sets out our aims and activities for the coming years alongside highlighting existing case studies and projects underway.

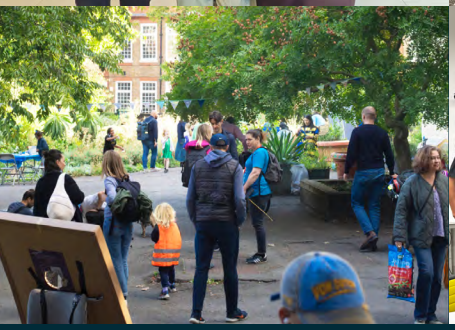
We believe that Sustains Us is a leading example of how investment through the Future Neighbourhoods programme has catalysed further action. It enables a localised, collaborative approach to positively addressing London's key environmental and energy priorities.

We welcome the chance to share our experience in supporting London's greener, fairer future, and look forward to the upcoming roundtable discussion.

Kind regards,

Nic Durston

Chief Executive, South Bank Employers' Group, on behalf of all Sustains Us partners



SOUTH BANK
& WATERLOO
sustains us

Delivery Plan 2026-2030

Delivery Plan Summary 2026-2030

The Sustains Us Delivery Plan sets out what we aim to deliver across South Bank and Waterloo between 2026 and 2030, supporting our vision for a fairer and greener neighbourhood for all.

It turns the Sustains Us vision and programme goals into clear, practical actions, showing what has already been delivered, what is currently underway, and what we aim to deliver next.

The Delivery Plan is organised around the four Sustains Us programme goals. For each goal, it explains what success looks like, highlights projects underway, and sets out priorities for the coming years.

The Delivery Plan is intended to be a shared tool for residents, organisations, businesses, funders and partners. It provides transparency about priorities and supports coordination and collaboration – to help turn ambition into delivery.

Programme goal	What this means	What we are delivering now	What we will deliver next
Clean energy and efficient buildings	Making buildings more energy efficient and moving away from fossil fuel heating through low carbon heat, renewables and expanding energy advice.	• Coordinating building owners around low carbon heat. • Sharing evidence from the Heat Network Feasibility Study. • Supporting informed decisions through stakeholder engagement.	• Supporting building owners to make decisions about heat network connections. • Improving access to trusted energy advice. • Exploring a community renewable energy project.
Improving air quality	Reducing pollution from transport and buildings while making it easier and safer to walk, wheel and cycle.	• Using data from the local air quality sensor network to inform action. • Providing clearer guidance to residents and businesses.	• Working with businesses on deliveries and servicing. • Providing air quality advice to businesses. • Improving information on routes, safety and air quality for active travel.
Building greater resilience to climate change	Creating greener, cooler streets and spaces that cope better with heat, heavy rainfall and river flooding.	• Developing detailed designs for drainage and greening in Waterloo East. • Mapping green assets through a Green Infrastructure Strategy. • Coordinating partners on flood and heat risk.	• Completing a river wall flood risk survey. • Securing funding to deliver drainage schemes. • Delivering priority greening and cooling projects across the neighbourhood.
Reducing waste and consumption	Making it easier to reuse, share and recycle while cutting waste and environmental impact.	• Running the Living Green Challenge. • Promoting reuse schemes such as the Library of Things. • Supporting businesses through the WeAreWaterloo BID recycling scheme.	• Improving signposting for businesses to waste and recycling support. • Engaging residents in local waste reduction initiatives. • Developing circular neighbourhood projects that support sharing and reuse.

What is South Bank and Waterloo Sustains Us

SOUTH BANK & WATERLOO sustains us

Introduction

South Bank and Waterloo Sustains Us is a collaborative programme and way of working that delivers one of the aims of South Bank and Waterloo Partnership's Vision 2030, to create a net zero neighbourhood. This builds on a net zero strategy for the area, developed with funding from the Mayor of London.

More than a greenhouse gas target, Sustains Us sets out a clear and ambitious vision for a fairer and greener neighbourhood. It focuses on clean air and energy, more space for nature, and more sustainable ways of living and working. Everyone has a part to play. Residents, businesses, and statutory and voluntary organisations all contribute to these shared goals, which are owned collectively.

A partnership approach

Sustains Us is delivered through a core partnership of Lambeth Council, Southwark Council, South Bank Employers' Group, South Bank and Waterloo Neighbours, WeAreWaterloo BID and South Bank BID. This is supported by a wide network of businesses, community organisations, cultural institutions and delivery partners. A Steering Group made up of partner organisations oversees the programme, helps guide priorities and supports coordination across projects.

The programme is funded through an innovative partnership model. Core costs are supported by Merlin Entertainments and Lambeth Council through the London Eye Section 106 agreement, South Bank Employers' Group, South Bank BID and WeAreWaterloo BID. So far, a further £700,000 has been secured to support delivery. This includes Lambeth Neighbourhood Community Infrastructure Levy funding allocated to South Bank and Waterloo Neighbours, government grants and funding from the Mayor of London.

SoWN · Lambeth · Southwark Council · IN PARTNERSHIP WITH MAYOR OF LONDON

SBEG · South Bank BID · Lambeth Climate Partnership · We Are Waterloo

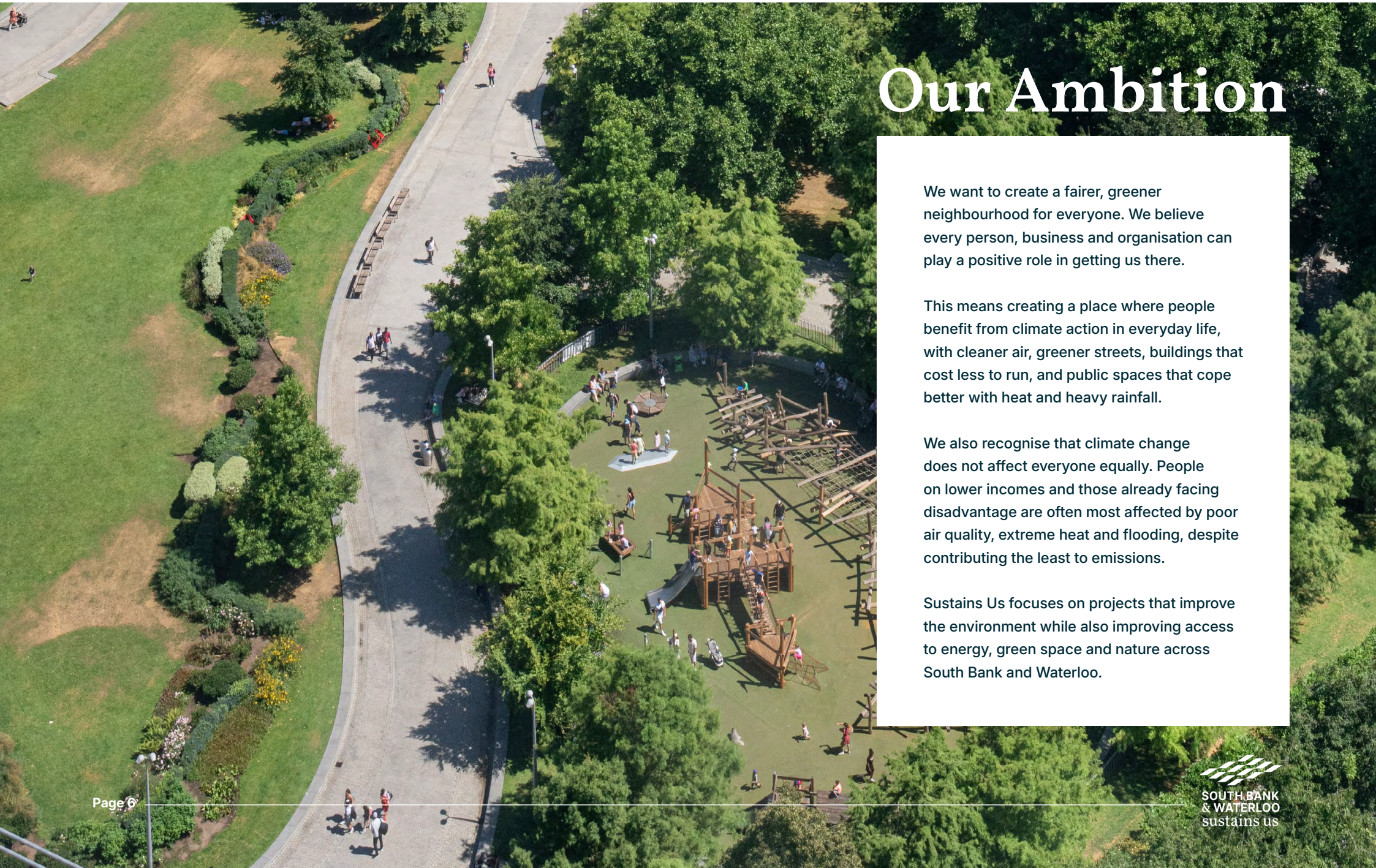
From ideas to action

Since its launch in October 2024, Sustains Us has focused on moving quickly from ideas into delivery. The programme has supported visible local projects while also building a pipeline of projects needed for longer term change.

This includes work to better understand challenges such as air quality, flood risk and building energy use, alongside projects that improve streets, support businesses and benefit residents.

Shaped by the community

Residents, businesses and local organisations have shaped priorities through events, workshops and ongoing engagement. This ensures the programme reflects local experience and responds to what matters most to people who live and work in South Bank and Waterloo. It also helps build shared ownership of the programme and its outcomes.



Our Ambition

We want to create a fairer, greener neighbourhood for everyone. We believe every person, business and organisation can play a positive role in getting us there.

This means creating a place where people benefit from climate action in everyday life, with cleaner air, greener streets, buildings that cost less to run, and public spaces that cope better with heat and heavy rainfall.

We also recognise that climate change does not affect everyone equally. People on lower incomes and those already facing disadvantage are often most affected by poor air quality, extreme heat and flooding, despite contributing the least to emissions.

Sustains Us focuses on projects that improve the environment while also improving access to energy, green space and nature across South Bank and Waterloo.

Our programme goals

Sustains Us is built around four goals that together support a fairer and greener neighbourhood.

Clean energy and efficient buildings

Improving the efficiency of buildings and shifting local energy supply towards renewable and smart systems that reduce energy use, replace fossil fuel heating and cut emissions.

Improving air quality

Reducing air pollution by supporting greener travel, encouraging walking, wheeling and cycling, and cutting pollution from deliveries and servicing.

Building greater resilience to climate change

Making streets and green spaces better able to cope with heat and heavy rainfall, improving health, supporting wildlife and strengthening the neighbourhood.

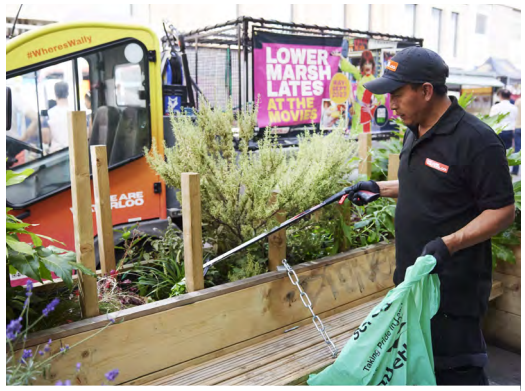
Reducing waste and consumption

Increasing reuse and recycling, reducing the amount of waste produced, and cutting the use of resources where possible.

Shaping the Sustains Us Delivery Plan

Working in partnership

Sustains Us is built on partnership working between residents, businesses, local and London government, and community organisations. This has shaped the development of this Delivery Plan. A series of engagement and consultation activities took place during 2025 to ensure local voices informed its direction.



The Sustains Us Residents Group

The Residents Group was set up in June 2025 to give South Bank and Waterloo residents a forum to share views on climate action and local priorities. Discussions highlighted the importance of practical and affordable actions that support greener living and help reduce household costs. The group also helped shape the Wonderful Waterloo and South Bank Fun Day held in September 2025.

The Wonderful Waterloo and South Bank Fun Day

The event took place at St John's Church on 21 September 2025 and brought together more than 250 residents with local organisations and businesses. It included creative, cultural and hands on activities such as the London Philharmonic Orchestra's Snail and the Whale workshop, the Octopus Garden Trail, children's activities, bike checks, clothing repair tutorials, climate themed games and gardening advice. Read more here.

A short survey showed clear priorities for residents, including more greening and tree planting, better care of existing green spaces, and cleaner air. These have directly informed this Delivery Plan.

Sustains Us: Shaping Our Future

A further consultation event took place at Lambeth Palace on 29 October 2025, bringing together more than 40 organisations. Participants reflected on progress and identified projects with the potential to make a big difference, helping shape the plans that follow. Read more here.

Delivery Plan 2026-2030

This section sets out the programme's plans from 2026 to 2030. For each goal it describes what we want to achieve, what has already been delivered, what is currently underway, and what we aim to do next, subject to funding and further development with partners.

SOUTH BANK & WATERLOO sustains us

Clean energy and efficient buildings

Ambition

We want to make buildings across South Bank and Waterloo more energy efficient and shift local energy supply towards cleaner and smarter systems. This means using less energy, moving away from fossil fuel heating, and cutting greenhouse gas emissions in ways that are affordable for residents and businesses.

What we want to achieve

We aim to:

- Support progress towards low carbon heat, including district heating where appropriate
- Enable local renewable and community energy projects where they are viable
- Increase the use of retrofit and energy advice services

What we have delivered so far

In May 2025, Sustains Us completed a £130,000 government funded Heat Network Feasibility Study with Lambeth Council. The study assessed 39 major buildings across South Bank and Waterloo and explored whether a low carbon heat network could work in the area. It showed that heating emissions could be cut by up to 95 per cent if a scheme were delivered. This work helped secure a further £100,000 of government funding to progress feasibility work.

Building on this, Sustains Us brought together building owners and partners at two stakeholder roundtable sessions in July and December 2025. The sessions focused on sharing learning, identifying next steps and reducing duplicated effort as interest in low carbon heat grows locally.

Since 2024, Sustains Us has also shared local learning through the London Councils Net Zero Neighbourhoods initiative. This has helped position South Bank and Waterloo as a place where partnership working can test new approaches to funding, governance and delivery.

Activity underway

The current focus is on supporting coordination around low carbon heat. Rather than delivering infrastructure directly, Sustains Us brings together building owners, operators and public sector partners to share information, work through challenges and make better informed decisions. This approach supports progress towards solutions that work at a neighbourhood level and was a clear priority raised through the Sustains Us Shaping Our Future event.

Future priorities

- Supporting building owners and local organisations to make informed decisions about heat network connections through shared evidence, coordination and practical guidance
- Improving signposting to trusted energy advice for residents and businesses, including services such as the Southwark Climate Collective and the LSBU Energy Advice Centre
- Exploring opportunities to work with a community energy group to deliver a local renewable energy project that cuts emissions and provides clear community benefit

Case studies

Lambeth Palace retrofit

The Lambeth Palace retrofit shows how historic buildings can be upgraded without harming their heritage value. The project improved insulation and building performance and introduced low carbon heating, cutting energy use and emissions while keeping the building fit for purpose. Read more here.

LSBU Energy Advice Centre

The LSBU Energy Advice Centre provides free, practical energy advice to local residents. Since opening in 2023, it has supported more than 1,000 people through drop in sessions, outreach events and remote support, helping households reduce energy use and cut their bills.
Read more here.

SOUTH BANK & WATERLOO sustains us

Improving air quality

Ambition

We want to improve air quality across South Bank and Waterloo by reducing pollution from transport and buildings, while making it easier and safer for people to walk, wheel and cycle. Many of the actions that cut carbon emissions and add greenery also help reduce air pollution.

What we want to achieve

We aim to:

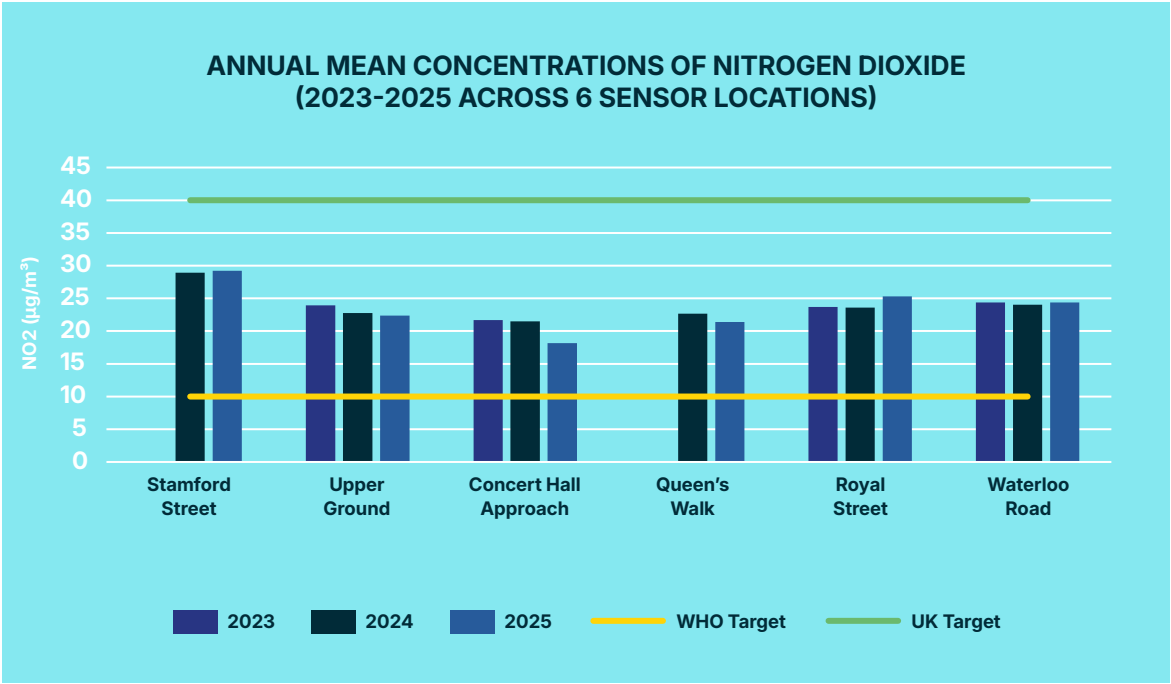
- Increase awareness of air quality and the simple steps people can take to protect their health and reduce pollution
- Work with businesses to cut pollution from deliveries and servicing where possible
- Support more walking, wheeling and cycling for local journeys

What we have delivered so far

Sustains Us has supported the coordination of a local air quality monitoring network. This includes six sensors funded by South Bank BID and five more operated by Lambeth and Southwark Councils. Together they provide real time, public data so residents, workers and visitors can see where pollution levels are highest and choose cleaner routes. You can view this data here.

Analysis of the data since the sensors were installed in 2023 shows that average levels of nitrogen dioxide and fine particulate matter are below UK legal limits. However, they remain well above World Health Organisation guidelines, which shows that air pollution is still a serious health issue in the neighbourhood.

This data provides a strong evidence base to guide action and focus effort where it is most needed.



SOUTH BANK & WATERLOO sustains us

Projects underway

We are building on this monitoring by improving how people use and understand air quality data. This includes linking information from the sensors to clear, practical guidance for residents and businesses. The aim is to show how everyday choices about travel, deliveries and building use can help improve local air quality.

This work also recognises that air pollution comes from both local and wider sources. Traffic, buildings and deliveries within South Bank and Waterloo play a role, but pollution is also affected by regional traffic, industry and weather. Sustains Us therefore supports local action alongside work with neighbouring areas and alignment with London wide and national air quality goals.

Future priorities

- Exploring delivery consolidation linked to Waterloo Station to reduce the number of vehicle trips into the neighbourhood
- Providing air quality advice to businesses, helping them understand their impacts and identify practical actions on deliveries, heating and travel
- Supporting more people to walk, wheel and cycle by improving information on routes, safety and air quality

Case study

Waterloo Freight Hub trial

The Waterloo Freight Hub trial, led by Cross River Partnership, tested how consolidating deliveries can reduce traffic. Parcels were brought into Waterloo Station and delivered locally using cargo bikes. The trial showed clear potential to cut congestion and improve air quality, and demonstrated how Waterloo Station could support cleaner freight across London.

Read more here.

Building greater resilience to climate change

Ambition

We want South Bank and Waterloo to be better prepared for a changing climate. This means creating greener streets and spaces that can cope with hotter, drier weather and heavier rainfall, while improving people's health and supporting wildlife. This work is closely linked to improving air quality.

What we want to achieve

We aim to:

- Reduce surface water flooding in known risk areas
- Increase tree cover and greening across streets and public spaces
- Improve preparedness for river flood risk along the Thames

What we have delivered so far

A major achievement has been the creation of a new green space at Hercules Road. This project transformed a vehicle dominated street into a greener, more resilient place. It helps manage rainfall, reduce heat and improve air quality.

Sustains Us also brought together local councils, the Environment Agency and local landowners and operators through a Flood Risk Roundtable. This helped create a shared understanding of tidal flood risk, roles and responsibilities, and the long term challenges linked to rising sea levels and river flooding.

Activity underway

Work is underway to develop detailed designs for sustainable drainage and greening in the Waterloo East area. This neighbourhood has experienced flooding during heavy rainfall. The project aims to reduce flood risk while improving air quality and creating a greener public realm. The project will produce ready to use designs to support future investment.

In parallel, Sustains Us is developing a Green Infrastructure Delivery and Investment Strategy. This will map existing green assets and identify priority projects, before setting out a coordinated approach to delivering and maintaining greening across South Bank and Waterloo.

Sustains Us also co-hosted a climate resilience event for the cultural sector with the British Film Institute and Bloomberg Associates during London Climate Action Week 2025. Held at BFI Southbank, it brought together nearly 80 participants from around 60 organisations to explore how venues can prepare for extreme heat and flooding.

Future priorities

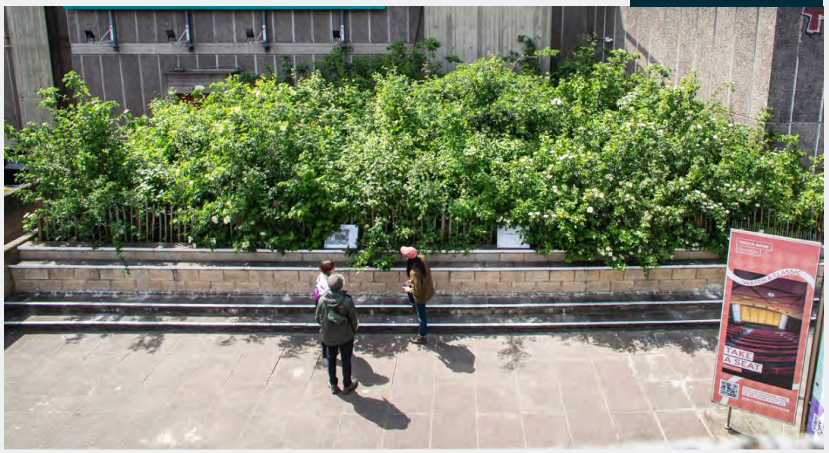
- Developing a river wall flood risk survey to better understand future flood risk and adaptation needs up to 2050
- Securing funding to deliver the sustainable drainage scheme in Waterloo East
- Supporting delivery of priority projects from the Green Infrastructure Strategy, especially those that cool streets and create space for nature

Case studies

Hercules Road

The Hercules Road project shows how targeted greening and drainage can transform a street. The scheme introduced 15 new trees and around 300 square metres of planting through £325,000 of partnership funding. It helps absorb rainwater, reduce surface water flooding, cool the local area and improve air quality for residents and visitors.

Read more here.



Southbank Centre Natura Nostra Forest

This project shows how innovative greening can work in a dense urban setting. The pocket forest introduced dense planting into the Southbank Centre site, creating habitat for wildlife, cooling the surrounding area and giving people a new way to experience nature in the city.

Read more here.

SOUTH BANK & WATERLOO sustains us

Reducing waste and consumption

Ambition

We want to reduce the amount of waste produced across South Bank and Waterloo by making it easier to reuse, share and recycle. By using fewer resources, we can cut environmental impacts beyond the neighbourhood and help people save money.

What we want to achieve

We aim to:

- Provide clear information to help residents and businesses recycle more
- Increase use of local reuse and lending schemes such as the Library of Things
- Improve local sharing of items and resources

What we have delivered so far

A key achievement has been the WeAreWaterloo BID business recycling scheme, which now supports more than 150 local businesses. Through a coordinated approach, businesses receive free or reduced cost recycling services, helping cut waste sent to landfill and reduce costs. On average, participating businesses save more than £2,000 a year.

Activity underway

The Living Green Challenge has been sent to more than 2,000 households across the neighbourhood. It provides clear, practical advice on reducing waste, recycling more effectively and making more sustainable choices.

The Living Green Challenge also promotes reuse schemes such as the Library of Things. Sustains Us communications also highlight water refill stations and other ways residents and visitors can reduce single use waste. Read more here.

Future priorities

- Improve signposting for businesses to existing schemes and services that can help them reduce waste and improve recycling
- Support residents to take part in local waste reduction initiatives and promote innovative approaches like the Library of Things
- Develop circular neighbourhood projects that support sharing, exchange and reuse

Case studies

Library of Things

The Library of Things allows residents to borrow items they only need occasionally rather than buying new. With a site at Elephant and Castle, people in South Bank and Waterloo can access tools, household equipment and other items for a small fee, reducing waste, cutting emissions and saving money. Read more here.

National Theatre Natural Dye and Wellbeing Garden

The garden grows plants used to produce natural dyes for costumes and textiles, replacing synthetic dyes and reducing chemical use. It supports a circular approach by growing, harvesting and reusing materials on site, while also providing space for learning, wellbeing and wildlife.
Read more here.

Monitoring our progress

Our approach to monitoring

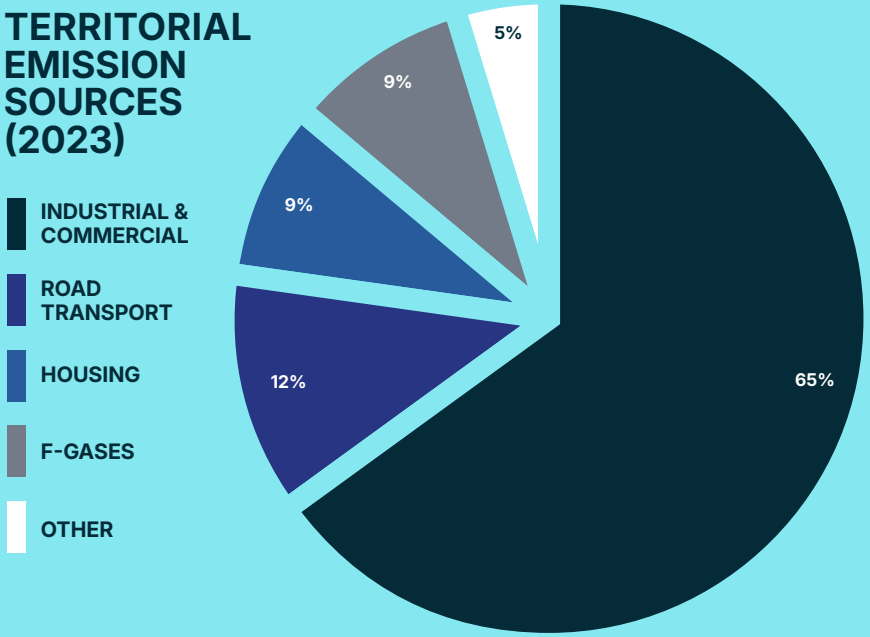
Sustains Us focuses on practical action that improves everyday life in South Bank and Waterloo. Monitoring is important, but it needs to be proportionate and focused on what matters locally.

This Delivery Plan sets out our direction with clear outcomes of what we want to achieve across South Bank and Waterloo. As a place-based, partnership-led programme, projects will continue to develop in response to local priorities, technical feasibility and funding opportunities. Detailed measures of success will be agreed with delivery partners at the individual project level as schemes move into delivery.

Air quality sensors across the neighbourhood, as referenced in the earlier section, continue to provide real time data. This helps track trends, understand the impact of projects and shape future work.

Greenhouse gas emissions

Where possible, we use existing data to understand trends in greenhouse emissions. This avoids the cost of creating new systems and allows more funding to be used for delivery. For carbon emissions, ward level data from the Impact Community Carbon Calculator provides a baseline. The most recent data for 2023 shows total emissions of around 134,000 tonnes of carbon dioxide equivalent. Energy use in commercial and industrial buildings is the largest source, which is why action on buildings and energy is a priority.



Steering Group oversight

The Sustains Us Steering Group oversees delivery of the programme. It includes representatives from Lambeth Council, Southwark Council, South Bank Employers' Group, South Bank and Waterloo Neighbours, WeAreWaterloo BID and South Bank BID.
The group meets every three months to review progress, guide priorities and respond to new opportunities.

Keeping people informed

Progress will be shared through events, regular updates and engagement with residents, businesses and partners. Information about Sustains Us, including project updates and opportunities to get involved, is available on the Sustains Us website here.

How to get involved

SOUTH BANK
& WATERLOO
sustains us

You can play an important part in delivering a fairer and greener South Bank and Waterloo.

Sustains Us requires partners, supporters and collaborators to help turn ideas into action - whether it's through funding, expertise, project delivery or simply a desire to connect and contribute.

There are many ways to get involved:

- Can your organisation support or help deliver any of the projects outlined above?
- Do you have ideas for how we can collaborate across the area to achieve our shared ambitions?
- Can you offer direct support or help unlock funding to expand and accelerate project delivery?
- Are you already running a project that aligns with our aims, which could be scaled up to support others locally?

If the answer to any of these questions is yes, we'd love to hear from you. Please get in touch via the South Bank and Waterloo Sustains Us website:

www.sbwsustainsus.org

London Environment Committee call for evidence - January 2026

As Europe's largest network of civil society organisations advocating for healthy, safe and affordable urban mobility, we are grateful to have the opportunity to put forward topics or issues that we believe the London Assembly Environment Committee should scrutinise in greater detail.

1. Carspreading / SUVs

The continued trend towards bigger cars, which is linked primarily to the rise of SUVs, is a significant threat to London's environmental targets. Around two-thirds of all new car sales in the UK are SUVs. This has led to the number of SUVs increasing from 3% to 30% of existing cars in London in the last two decades (2002/3 – 2022/3), an increase by almost three quarters of a million[1].

SUVs threaten greenhouse gas emissions targets given they account for more than a quarter of the overall annual growth in global oil demand[2], burning on average around 20% more fuel. They also threaten air quality targets given heavier cars emit more $PM_{2.5}$ emissions from tyre wear.

SUVs threaten biodiversity and green spaces as they need more space. Cars are getting on average 1cm wider every two years and more than half of new cars in the UK are too wide for typical urban parking spaces[3]. If you tried to park the estimated 800,000 SUVs in London next to each other, with a 1m gap between them, it would be a similar size as the Royal Borough of Kensington & Chelsea.

The Mayor should support Londoners to switch to more regular sized electric cars and discourage large, polluting SUVs, including by supporting boroughs to vary parking tariffs, introducing a large car surcharge on the Congestion Charge and securing a London-wide electric car club scheme. YouGov polling has shown 61% of London parents are concerned that bigger cars make it more dangerous for children to walk and cycle in London (16% disagree) and a majority of Londoners (59%) support higher parking charges for SUVs (18% disagree).

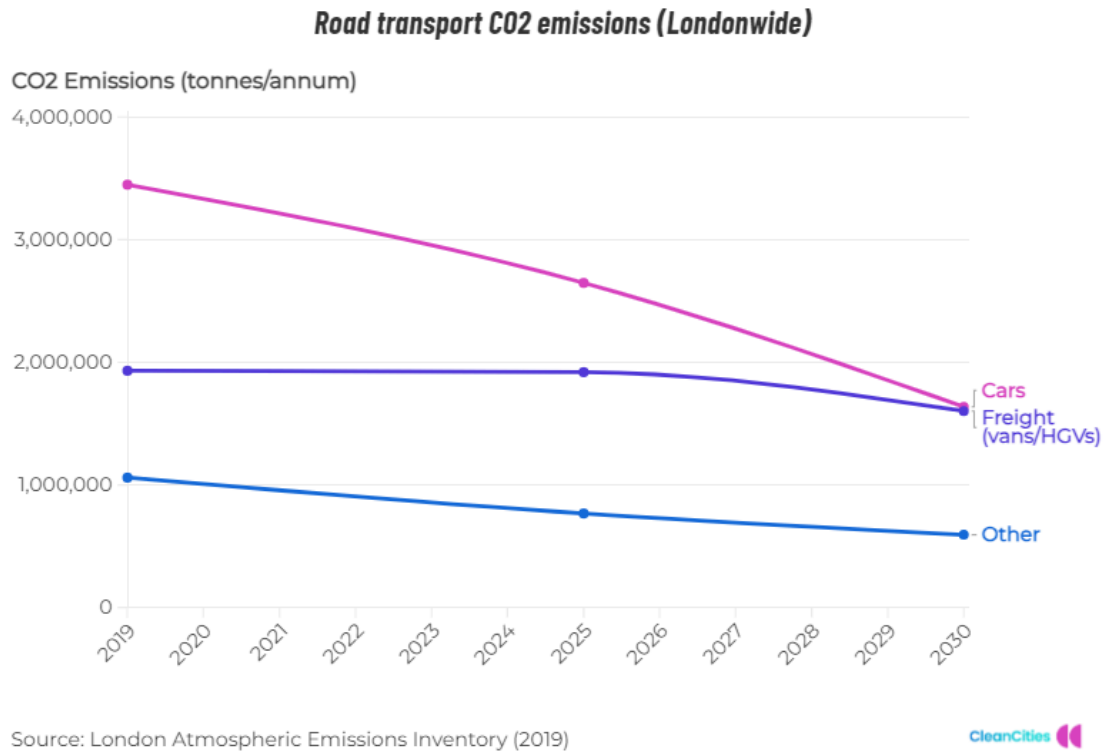
2. Urban logistics

The UK Climate Change Committee also published a "key action" in its seventh carbon budget report to *"develop further policies and incentives to accelerate zero-emission van uptake"*. Furthermore, we have examined different pathways for cities to achieve a zero emission transport system and concluded that

[1] https://cleancitiescampaign.org/10-times-more-suvs-in-cities-in-last-two-decades/
[2] https://www.iea.org/commentaries/suvs-are-setting-new-sales-records-each-year-and-so-are-their-emissions
[3] https://cleancitiescampaign.org/1-million-cars-sold-every-year-too-big-to-park/

switching urban freight and deliveries to electric vans, trucks, and cargo bikes is an essential component to any feasible net zero pathway.

Evidence shows that London is not on track to doing this quickly. A previous analysis of the London Atmospheric Emissions Inventory (2019) shows that carbon emissions from freight vehicles (vans, HGVs) in London are estimated to reduce by 17% by 2030 (on 2019 levels), compared to a halving of CO_2 emissions from the car fleet (51%)[4].



Vans are the top road transport contributor to NOx emissions in central London[5], leading to levels of Nitrogen Dioxide far above WHO guidelines[6]. The hidden social and environmental costs associated with diesel vans are estimated to total £2.46 billion annually in London[7].

The Mayor of London's preferred pathway to net zero requires that all new vans registered in London are zero emission by 2030 and that 34% of van kilometres are electric by 2030 (and 46% of cars). Given this high ambition, coupled with lagging sales of electric vans, it would be prudent to assume we are not yet on this trajectory. TfL data shows that battery electric vans accounted for

[4] Please note we are in the process of updating this analysis following the LAEI 2022 release
[5] https://cleancitiescampaign.org/vans-now-number-one-road-source-of-dirty-air-in-central-london/
[6] https://felt.com/map/Recorded-levels-of-Nitrogen-Dioxide-2026-qzqK9ACS0T0SvokSbhXfxcA?loc=51.5152,-0.1207,11.44z
[7] https://www.justeconomics.co.uk/delivering-value

approximately 10 per cent of total van vehicle kilometres in 2024 in central London, around six per cent in inner London and four per cent in outer London[8].

Businesses need continued support to procure and operate modern cleaner electric vans. Just 2% of diesel vans scrapped under the Mayor's ULEZ scrappage scheme were replaced with an electric van, despite more than £100 million being spent[9]. Whilst the ULEZ scrappage scheme wasn't primarily intended to accelerate the uptake of electric vans, it would be prudent to ensure we get the best value for money from public funding going forward.

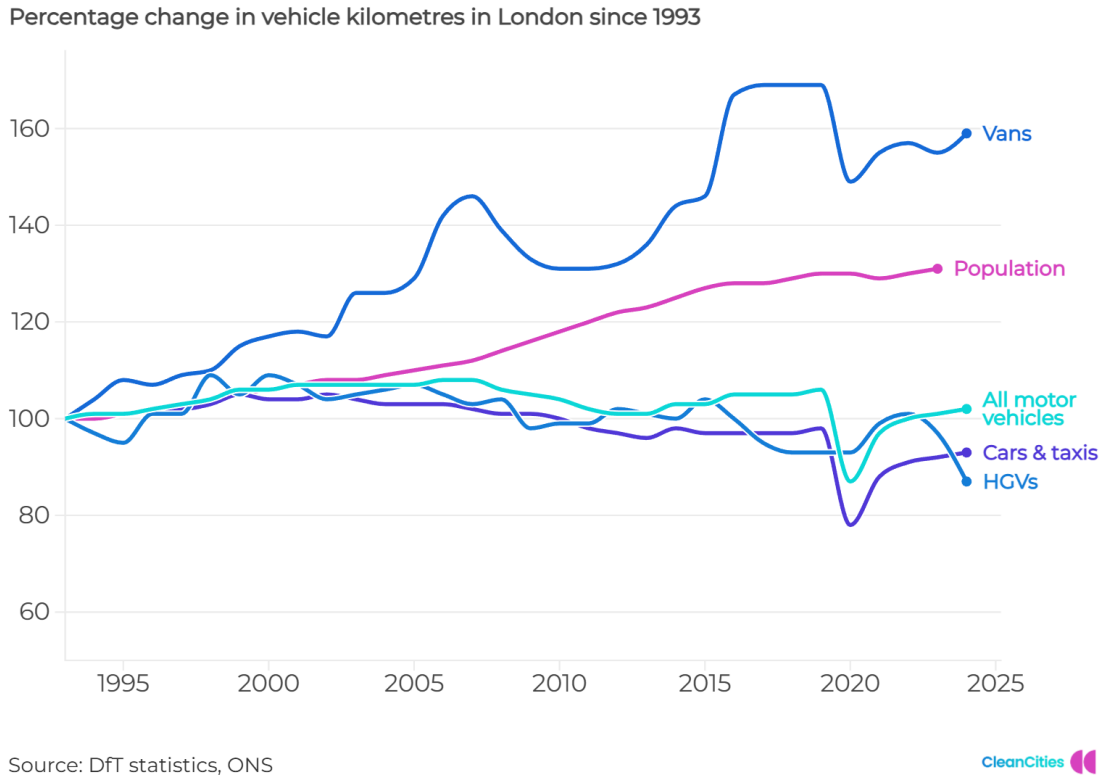
Even newer diesel vans remain an environmental problem. Evidence shows the vast majority of ULEZ compliant Euro 6 vans built between 2016 and 2020 emit several times above the regulatory limit for NOx emissions[10], hindering progress towards clean air. In contrast Euro 6 technology has broadly been performing well in the heavy duty vehicle sector.

Brand new polling commissioned by Clean Cities has found that two-thirds of Londoners think that their local council should be doing more to support clean deliveries[11]. Our previous public polling of Londoners in 2024 also found[12]:

- Almost three-in-five (59%) Londoners want their council to do more to combat air pollution and protect the environment
- One in five (21%) Londoners believe UK businesses are doing enough to combat air pollution;
- Two thirds (67%) of Londoners believe that small businesses need more support to transition to electric vehicles;
- Over half (54%) of Londoners back "unpopular" measures for businesses to protect the planet such as a 5p charge on deliveries to fund air pollution prevention;
- More than half (57%) of Londoners would collect their delivery from a local pick up point if it cost less than delivering it to their home (e.g., if Amazon or other online retailers' price was cheaper when you opt to collect).

Alongside a significant increase in the uptake of electric vans, London's pathway to net zero also requires a maximum 2% growth in van vehicle kilometres by 2030 (on 2020 levels). The latest data shows this has already grown by 6% in 2024[13].

[8] https://tfl.gov.uk/cdn/static/cms/documents/travel-in-london-2025-annual-overview-acc.pdf
[9] https://cleancitiescampaign.org/mayors-100-million-ulez-scrappage-scheme-fails-to-fuel-electric-van-surge/
[10] A later industry fix came into force from Sept 2020 '6d-TEMP', which tested real world driving conditions better https://www.trueinitiative.org/news/2022/june/true-rating-emissions-update-petrol-vehicle-deterioration-and-new-diesel-improvements-fall-short
[11] Representative polling of 8,418 adults across 9 European cities including London by OpinionWay on behalf of Clean Cities, undertaken between 13 and 27 November 2025
[12] Clean Cities' polling fieldwork undertaken between 31 May and 4 June 2024 of 4,000 UK adults by Yonder
[13] https://roadtraffic.dft.gov.uk/regions/6



Part of the solution is to support the uptake of e-cargo bikes (as well as other vehicles like quadricycles), which TfL believe could replace up to nine percent of van kilometres driven in central London by 2025 and up to 17 percent of van kilometres by 2030. Our analysis has found that cargo bike use increased across London by 104% from 2022 to 2024[14].

Although the increase in cargo bikes is welcome, there is a lot more to do to continue the progress – the data reveals a slightly slower increase in cargo bike adoption from 2022-23 to 2023-24, showing the need for the Mayor and boroughs to incentivise businesses and residents to use cargo bikes more often.

Amongst other things, we are calling for the provision of new grants for small businesses and residents to support the purchase of new cargo bikes. We are pleased several London local authorities have signed the Cargo Revolution Borough Charter to demonstrate their commitment towards this mode[15].

We've been monitoring very closely what has been happening in the Netherlands, where they took a bold step to address this by introducing 18 zero-emission zones for freight (ZEZ-Fs), with plans to expand to 29 municipalities by 2030. There are requirements that were drafted with businesses and gradually phased in over

[14] https://cleancitiescampaign.org/cargo-bike-use-doubles-in-london-across-last-two-years/
[15] https://www.cargorevolution.org/borough-charter

time for delivery and goods vehicles to be zero emission when driven in the city centre, with most freight vehicles being regulated by 2030.

Early data shows these zones are already driving a rapid shift to electric vans and trucks, offering a blueprint for cleaner, quieter, and healthier urban freight across Europe. Our new research shows that electric van sales in the Netherlands account for 78% of all new van sales, compared to around 9% in the UK[16]. One in five new electric trucks sold in the EU are also in the Netherlands. Ambitious policy at a city level is clearly driving this investment.

We're expecting similar schemes to come online in Copenhagen and Stockholm following new laws being introduced. The Paris City Council also approved plans for a zero emission freight area in the centre of the city (although they have mayoral elections first in spring 2026).

We've modelled a similar scheme for London, which would deliver huge carbon and health cost savings[17]. This could be a very effective policy if work started soon in collaboration with the business community (noting it draws parallels to the existing commitment in the Mayor's Transport Strategy to deliver a zero emission zone in central London from 2025).

3. Zero emission capable requirements for taxis/PHVs

London has made great progress towards electrifying its extensive taxi and private hire fleet through progressive emissions requirements introduced since 2018. The latest data shows that around 1 in 5 PHVs in London are battery electric, compared to an average of around 1 in 100 elsewhere in England[18] and more than half the taxi fleet is also plug-in or battery electric.

However, existing zero emissions capable (ZEC) requirements for taxis and PHVs were developed ten years ago and vehicle technology has significantly moved on since. We consider it important to update these requirements in the context of research from T&E that the real-world CO_2 emissions of plug-in hybrid (PHEVS) models are nearly five times the official emissions.

We estimate that of all the licensed PHVs in London meeting the current TfL ZEC requirement, roughly a third are plug-in hybrids (around 15,000)[19]. The current taxi model made by LEVC is also a PHEV (range-extended petrol engine) and work should be undertaken to help cabbies transition to a battery electric model. However, this is unlikely to happen without TfL setting regulations.

[16] https://cleancitiescampaign.org/research-list/dutch-zero-emission-zones-for-freight/
[17] https://cleancitiescampaign.org/research-list/pathways-to-zero-emission-freight-london/
[18] T&E UK analysis of DfT data
[19] Unpublished Clean Cities analysis of TfL data

This isn't only about excess emissions and the impact on environmental targets. The ZEC policy is also putting pressure on the boroughs to deliver charging infrastructure because taxi and PHV drivers *(of which there are almost 100,000 registered in London)* are using vehicles with poor battery range and boroughs are having to compensate for this by delivering more charge points.

The Cabbies for Climate project from the charity Purpose has found battery capacity to be the second most important motivator to switch to a greener vehicle, followed by charge points. We believe that if cabbies had a full electric taxi to purchase with a proper range of 250-300 miles then this would motivate them to switch sooner (alongside financial incentives).

The TfL Taxi and Private Hire action plan 2025 has an action (14) to consult with the taxi trade and private hire industry in 2025/26 on a proposal to introduce a future zero-emissions (at the tailpipe) licensing requirement for taxi and private hire vehicles. However, it is currently unknown when this is taking place. TfL should publish this consultation as per the committed timescales and before the London local elections pre-election period to avoid any delays in supporting this transition.

Oliver Lord
UK Head of Clean Cities

Dear Environment Committee,
I am writing to submit evidence to the London Assembly Environment Committee's investigation "Progress on priorities: London's Environmental Temperature Check." This call for evidence comes at a crucial moment - almost a decade after the Mayor's pledge to make London the "greenest global city," eight years after the London Environment Strategy, and four years before the 2030 net-zero target. I welcome the Committee's decision to take stock of London's environmental progress and to gather insights from experts, practitioners, and communities to inform future scrutiny and priority-setting.
1. Integrating Indoor Environmental Quality (IEQ) into London's Environmental Strategy: The current London Environment Strategy does not adequately address indoor environmental quality, including damp, mould, overheating, ventilation, and indoor air pollutants, despite these being major determinants of health and disproportionately affecting vulnerable populations. Addressing IEQ alongside outdoor air quality and climate resilience would close a significant gap in London's environmental governance.
2. Climate Resilience and Housing Risk: London's ageing housing stock faces increasing risks from overheating, moisture accumulation, and inadequate ventilation under worsening climate conditions. These building-scale vulnerabilities intersect closely with health inequalities and should be incorporated into citywide resilience planning. The Committee's focus on climate resilience, emissions reduction and biodiversity aligns strongly with this need.
3. Environmental Equity and Exposure Disparities: Environmental burdens, including air quality, heat stress, noise, and poor housing conditions, are unevenly distributed across the city. The Committee's emphasis on hearing from those experiencing and delivering environmental policy is essential to ensure that future priorities address persistent inequities.

Recommendations for Future Investigation Priorities

1. Indoor–Outdoor Air Quality Integration: A coordinated framework connecting emissions, infiltration, ventilation, and exposure.
2. Moisture, Damp and Mould as Climate-Linked Risks: Recognising these as resilience issues, not solely housing management problems.
3. Urban Heat and Vulnerability Mapping: Systematic identification of overheating hotspots, especially in vulnerable housing types.
4. Climate-Related Data for Preparedness and Recovery: Incorporating insights from disaster-related fieldwork to strengthen London's resilience planning.
5. Improved Cross-Sector Coordination: Strengthening integration between planning, public health, housing, energy, and environmental governance.

In line with this I would be pleased to provide further written evidence on indoor air quality, moisture, mould, and urban microclimate; contribute building physics and resilience insights; and support future investigations through expert testimony or technical review.
Thank you for undertaking this important investigation. Ensuring that London's environmental priorities reflect both current risks and future challenges - particularly at

the interface of housing, health, and climate - is essential for achieving equitable and resilient outcomes for all Londoners.

Please do not hesitate to contact me should further detail be helpful.

Kind regards,

Dr Yasemin Didem Aktaş

Associate Professor in Applied Materials and Structures for MEng in Engineering and Architectural Design
UK Centre for Moisture in Buildings (UKCMB) Deputy Academic Director
UCL Open: Environment Deputy Editor-in-Chief for Infrastructure and Built Environment
UCL Environment Domain Early-career Network (EDEN) Chair
Earthquake Engineering Field Investigation Team (EEFIT) Chair
UNESCO Chair in Disaster Risk Reduction and Resilience Engineering deputy-Chair
UCL Lancet Commission on Urban Health Equity Working Group member
EGU Climate Hazards and Risk Task Force member

Relevant Publications:
Aktas, Y.D., Redmond, S., Rickaby, P. (2026) BSRIA / UKCMB BG 90/2026 Dealing with Condensation, Damp and Mould in Social Housing, BSRIA (in press)
Aktas, Y.D., Gribble M., Osborn, D., Spini, L., Berry, P., Aletta, F. (2025) Editorial: A Role for Cities in Sustaining Planetary Health. UCL Open Environment, UCL Open Environment 8(1), doi: 10.14324/111.444/ucloe.3601
Defra, GoScience, Hardy E. (2025) Climate Adaptation Research and Innovation Framework, Defra
Efthymiopoulos, S., **Aktas, Y.D** (2024) TG 26/2024 BSRIA Topic Guide: Mould in Buildings, BSRIA

Ultrafine Particles from aviation (UFPs)

What are UFPs?
Ultrafine particles are particles with a diameter less than <0.1 micrometers. UFPs are the smallest category of particulate matter (PM) in terms of particle size. PM describes solid and liquid particles in the air that are typically classified as PM2.5 and PM10 (particles of <2.5 and <10 micrometers). Under the PM classification, all particles of a smaller category are included in the larger categories. UFPs tend to make up a small fraction of particle mass but a large proportion of the number of particles in the air. UFPs are largely emitted from combustion in industry (e.g. burning coal) or from burning sulphur-based fuels in transport. Road vehicles are the major urban source, although aviation UFPs can disperse tens of kilometres from airports. Aviation fuels have a much higher sulphur content than road fuels. It is thought that UFPs from aviation have different compositions than road-sourced UFPs.

UFP regulation
PM2.5 and PM10 are frequently monitored for health impacts (which can indirectly measure UFP presence), however there are no limits specific to UFPs anywhere in the world. EU regulations and World Health Organization (WHO) guidance are stricter than UK PM limits.

Air quality limits (year set)	**PM2.5** (µg/m^3)	**PM10** (µg/m^3)
UK (2010)	40	20
England 2030 (2025 non-binding)	10	N/A
EU by 2030 (2024)	10	20
WHO (2021)	5	15

- Why aren't UFPs more tightly regulated?

Whilst there is a significant body of evidence on the effects of UFP exposure, the WHO deemed this insufficient to set guideline levels due to differences in methods which limited the comparability of studies. The actual measurement of UFPs is challenging, expensive and not standardised, limiting the presence of monitoring, with only 3 long-term sites in the UK.

The WHO has four good practice statements for UFPs, focused on quantifying and monitoring UFP levels and improving exposure assessment. They also set low concentrations (24-hour mean) as < 1,000 particles/cm^3 and high concentrations as > 10,000 particles/cm^3 or 20,000 particles/cm^3 (1-hour). With the evidence base around UFPs improving, precautionary measures become more feasible. The EU Air Quality Directive now includes specific requirements for UFP monitoring. DEFRA consulted on environmental targets in 2021 and concluded that the best approach was to focus on PM2.5. They recognised that improved monitoring would be useful for assessing health impacts and setting targets for components of PM2.5, including UFPs.

- Aviation fuel standards

The International Civil Aviation Organization implemented a new Standard in 2023 to regulate how much non-volatile PM an aircraft engine can emit, a category of emissions largely made up of soot, which contains UFPs. Similar standards are in place for new road vehicles in Europe, which is important as airport traffic is likely to be a significant contributor to local UFP concentrations.

Any benefits from regulation are likely to be wiped out by rising flight numbers, as noted by DEFRA's Air Quality Expert Group (AQEG): 'growth of air traffic is likely to cause increased UFP concentrations in the vicinity of airports, unless the fuel sulphur content is reduced'.

What impact do they have on public health?
UFPs contribute to the wider health risks from PM, although separating their exact toxicity from larger particles can be challenging. UFPs may potentially present a higher health risk due to their small particle size, which both leads to increased total surface area (linked to toxicity) and deeper penetration into the lungs. UFPs have been linked to issues with heart and lung function, diabetes, high blood pressure and dementia.

What do we want to see?

- Better assessment of airport-related UFPs around the UK (including health impacts)

Baseline monitoring, especially given the push for airport expansion, is required to fully understand the extent of UFP emissions around UK airports. This is a key step for aviation in taking responsibility for reducing harmful pollutants and developing appropriate policy and targets in the future. Development of a measurement standard for UFPs around airports would be beneficial for this process. As this evidence base builds, it can be used to create a better picture of the health impacts associated with UFPs. Whilst several monitoring studies have been conducted around UK airports, there is yet to be a UK-based study on aviation UFPs and health outcomes.

- Full consideration in planning decisions

UFPs continue to be largely overlooked within the planning system due to a lack of legal limits. Within the Gatwick Airport expansion inquiry, the airport deemed it not possible to predict UFP concentrations, instead carrying out a qualitative assessment. Funding for UFP monitoring around Gatwick is also conditional on limits being written into law. The absence of regulatory limits and monitoring continue to be played against each other in a chicken and egg scenario that leaves UFPs unaccounted for in expansion approvals. There is growing momentum for including a proper assessment of UFPs within the Airport National Policy Statement (ANPS), which is currently being reviewed. In discussing Heathrow expansion in December, the London Assembly Environmental Committee recommended that: *'The government should ensure that the role of UFPs from aircraft is properly assessed and included as part of the government's tests for its ANPS, and ensure that there is a systematic process for measuring around Heathrow and other London airports.'*

- Regulatory proposals to limit and reduce

The body of evidence linking UFPs to negative health outcomes is growing. It would be sensible to take a precautionary approach by setting limits and reduction plans on airports. Specific measures to target UFPs are essential, with the DEFRA AQEG making it clear that, 'Policies and actions to control ambient PM2.5 and PM10 will not always control UFP'.

- Hydrotreatment and use of alternative fuels

These offer two possible routes to 'cleaning up' jet fuel and reducing PM emissions. Hydrotreatment is a refinery process that reduces the impurities (e.g. sulphur and aromatics) in kerosene. Some alternative fuels may also produce fewer PM emissions. These solutions are not without their own problems (e.g. cost, certification and scale), and a better understanding of them is needed to weigh the benefits, co-benefits and potential costs.

Clean Air in London: Further Comments

In addition to 'clean air' matters, I am keen to bring to your attention an alarming report (https://www.london.gov.uk/media/110943/download), looking into the future climate suitability of London's trees.

I believe the report has not been shared widely by the GLA – perhaps due to the sober reality of the findings.

Key takeaways include:

- If no changes are made, in total, 73% of London's public trees may struggle to thrive or survive as the climate changes.
- Only 0.38% of London's current trees are considered highly suitable for future climate conditions.
- Only three native species are classified as having a high or moderate suitability to climate change. These are wild service tree (*Sorbus torminalis*), hawthorn (*Crataegus monogyna*) and yew (*Taxus baccata*).
- Many common street trees in London, such as silver birch (*Betula pendula*), are considered vulnerable, while species like the holm oak (*Quercus ilex*) show high suitability.

As a Londoner, clean air campaigner and neighbourhood planner, I urge you to highlight and investigate the significance of this report. What action is the Mayor taking to avoid the looming crisis and highlight the issues to others?

Best.
Clean Air in London

Susi Arnott

As a Londoner and a biologist, I'm grateful for what the GLA's achieved, but alarmed that changing climate systems themselves seem to be overlooked.

The weakening Atlantic Meridional Overturning Circulation ('AMOC') is in the news[1]. A 'tipping point' is potentially imminent, after which shutdown would be inevitable.[2] Risks are actively debated, but range from 70% (high-emissions future), to 25% (low emissions)[3].

So decarbonisation is increasingly urgent, but so is the need to prepare for change. There's only so much London can do to look after itself, and it's good that basic needs like thermal comfort, food and water are central to many of the Mayor's pledges. But AMOC shutdown would render 'cost of living' incalculable; UK summers would still be warmer on a heating planet, but winters would become intolerable and agriculture impossible.[4]

Perhaps as a group you have consciously decided to play down climate urgency (as central government seems to have done re ecosystems: it took an FOI application for a national security assessment to be released[5]). Let us assume socially-minded rather than sinister intentions for this. But in a state of emergency, we must behave accordingly.

The Mayor can continue to act calmly, but more radically – endorsing greater urgency across the boroughs, and from their global peers. There's public hunger for greater education and understanding[6], and most of us are already worried about climate breakdown[7]. Please address the absolute risk more directly.

(Dr) Susi Arnott

[1] https://www.channel4.com/news/atlantic-current-collapse-could-trigger-unprecedented-cooling-scientists-warn

[2] https://www.nebriefing.org/briefings/tipping-points (jump to ~4' in, if necessary, for the AMOC explainer)

[3] https://www.youtube.com/watch?v=HKBTZ324COA (jump to ~10'30" in, for different scenarios)

[4] https://en.vedur.is/media/ads_in_header/AMOC-letter_Final.pdf letter to Nordic Council of Ministers

[5] https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security/national-security-assessment-on-global-ecosystems-accessible-version#key-judgements

[6] http://www.susiarnott.co.uk/the-climate-emergency/climate-literacy-zine/ A free resource, with 190,588 visits at last count

[7] https://news.sky.com/story/brits-still-buying-evs-heat-pumps-and-solar-panels-despite-drop-in-polling-support-and-political-attacks-sky-news-analysis-finds-13463990