

GREATER LONDON AUTHORITY

REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2833

Draft London Plan Integrated Impact Assessment

Programme: Making Best use of Land

Executive summary:

This Assistant Director Decision seeks approval to spend £24,950, with a further contingency of up to £15,000, for specialist support to assist the London Plan team in undertaking an Integrated Impact Assessment (IIA) of the draft new London Plan. This includes assessment of the spatial strategy. The total potential spend is £39,950.

The IIA is a comprehensive assessment of the new draft London Plan examining the likely impacts of the proposed policies against legal requirements.

Decision:

That the Assistant Director of Planning and Regeneration approves:

- spending £24,950 for technical support and advice from Land Use Consultants, who will act as lead consultant to the London Plan team with respect to the Integrated Impact Assessment
- a further contingency of up to £15,000 if additional work is needed to support statutory requirements in the development of the London Plan, specifically with regard to the iterative assessment of the spatial strategy.

AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

Name: Lucinda Turner

Position: Assistant Director Planning and Regeneration

Signature:



Date: 5 May 2026

PART I – NON-CONFIDENTIAL FACTS AND ADVICE

Decision required – supporting report

1. Introduction and background

- 1.1. The Mayor is preparing a new Spatial Development Strategy (SDS) for London under the Greater London Authority Act 1999 (as amended) (GLAA 1999). This will guide how the city grows and evolves over the next 20-25 years, with a strong emphasis on good growth: development that is sustainable, inclusive, and future-proofed. This forms the foundation of the Plan as a whole and guides sustainable development in London – with the aim of improving health, reducing inequalities, and creating a sustainable, inclusive city. It will do so by addressing housing shortages; spreading economic benefits; reducing car dependency; and ensuring requisite supporting infrastructure.
- 1.2. The new London Plan is being developed in a significantly different context to the current London all Plan – most notably the requirement set by national government to plan for 880,000 new homes over the next 10 years. This is a level of housing delivery that has not been reached since the 1930s. Planning for this level of housing growth alongside all of London’s other development needs must be done in the most sustainable way. Nonetheless this will still create pressures that require choices, trade-offs and mitigations as far as possible. This scale of growth will inevitably have some impacts.
- 1.3. An Integrated Impact Assessment (IIA) is a comprehensive assessment of the draft London Plan, examining the likely impacts of the proposed policies within the draft London Plan against legal requirements as set out within the legal section of this decision. This assessment will include a:
 - Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)
 - Health Impact Assessment (HIA)
 - Community Safety Impact Assessment (CSA)
 - Equalities Impact Assessment (EqIA).

Note: information from the parallel workstream of the Habitats Regulation Assessment (HRA) will inform this IIA but will be reported separately.

- 1.4. The proposed scope of the IIA of the new SDS for London is detailed in the draft IIA Scoping Report. This was published on the GLA website on 19 December 2025 and consulted on until 13 February 2026.
- 1.5. The timeframe for the IIA is aligned with the new London Plan, which will cover a period of 20-25 years from adoption (estimated as 2028). The London Plan applies to the Greater London Authority (GLA) administrative area and this is the principal spatial scope for the IIA. The IIA will also take account of potential impacts on adjoining areas as appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions. The key geographic areas within the GLA boundary are defined by the individual London boroughs and the areas of central, inner and outer London.
- 1.6. The IIA will be published alongside the draft London Plan as part of the statutory consultation over summer 2026, providing an opportunity for stakeholders and the public to comment on the assessment. It will also form part of the documentation submitted to the Secretary of State ahead of the Examination in Public.
- 1.7. The technical support and advice from Land Use Consultants (LUC) – appointed through a competitive procurement process – will see them act as lead consultant on this matter to the London Plan team. Their role includes supporting policy and spatial appraisals, assessing reasonable alternatives as part of the IIA, and, where necessary, providing additional support on the assessment

of the spatial strategy. LUC will also review the final assessments, produce the full IIA document, and provide quality assurance to ensure the robustness and credibility of the final output.

2. Objectives and expected outcomes

- 2.1. Carrying out a comprehensive assessment of the new London Plan and its proposed policies through a single integrated process will address the Mayor's legal duties.
- 2.2. The IIA will ensure that the London Plan team's appraisals fully embed and integrate all relevant considerations into the preparation and adoption of the Plan. It will identify and describe and evaluate the likely significant effects of implementing the strategy and its reasonable alternatives; and propose appropriate mitigation opportunities and monitoring measures.
- 2.3. The support of LUC to undertake the appraisals will help to ensure robust assessment.

3. Equality comments

- 3.1. The Mayor and the GLA are subject to the Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010 covering race, disability, sex, age, sexual orientation, religion or belief, pregnancy and maternity, gender reassignment, and marital or civil partnership status. These are the grounds upon which discrimination is unlawful and are referred to as 'protected characteristics'. The Duty requires the Mayor, when exercising his functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act; and to advance equality of opportunity, and foster good relations, between persons who share a relevant protected characteristic and persons who do not.
- 3.2. Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, the need to:
 - remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not
 - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 3.3. Procuring specialist support for the IIA will help ensure that equality considerations are fully embedded in the ongoing development of the London Plan and associated processes, including the identification of potential impacts on people with protected characteristics. The procurement itself is not expected to have any negative equality impacts, and the appointed supplier is required to comply with all relevant equalities legislation and GLA policies, including ensuring document accessibility.

4. Other considerations

Key risks and issues

- 4.1. If the work is not progressed in a robust manner, it would create significant legal, policy and delivery risks for the London Plan. The IIA is required to demonstrate compliance with statutory duties, including the SEA Regulations and the Public Sector Equality Duty. The Mayor needs to show that

environmental, social and equality impacts have been properly considered in preparing the Plan. There could also be risks of delays to its progression through statutory consultation and Examination in Public. It could also limit the ability to identify mitigation measures, monitor impacts, and ensure that the Plan supports fair and inclusive outcomes for Londoners.

- 4.2. Bringing in specialist expertise will support accurate identification and assessment of impacts. Reasonable alternatives will be properly considered, and evidence-based mitigation measures identified, through the use of additional technical experience and knowledge; established methodologies; and professional judgement. This aims to reduce the risk of legal challenge; strengthen the quality of the London Plan; and ensure that the assessment meets the expectations of the Secretary of State and the Examination in Public.

Links to Mayoral delivery plans and other strategies and priorities

- 4.3. As the IIA assess the impact of London Plan policies across environmental, health, equality and wider thematic objectives, it will have links with many of the Mayor's programmes, including:
- Building More Homes
 - Reducing Inequalities
 - Boosting London Growth Sectors.

It will also have links with key Mayoral strategies, such as:

- the London Environment Strategy 2018
- the London Health Inequalities Strategy 2018,
- the London Housing Strategy 2018
- the Mayor's Equality, Diversity and Inclusion Strategy 2018
- the Culture Strategy for London 2018
- the Mayor's Transport Strategy 2018.

It will also link to the London Growth Plan 2025. The scoping of the IIA has had regard to the Mayor's priorities to ensure consistency.

Impact assessments and consultations

- 4.4. The proposed scope of the IIA of the new SDS for London is detailed in the draft IIA Scoping Report. This was published on the GLA website on 19 December 2025 and consulted on until 13 February 2026.
- 4.5. There were 25 consultation responders including the three statutory bodies (Historic England, Natural England and the Environment Agency), alongside a number of local authorities and some other stakeholders, such as housing providers.
- 4.6. The consultation feedback from Historic England sought to:
- ensure strong references in relation to how London's existing building stock contributes to climate adaptation and mitigation through reuse and retrofit
 - highlight the link between the built, natural and historic environments to health outcomes

- advise for a strong integration of heritage considerations, supporting heritage led regeneration, and sustaining heritage based tourism as a vital part of London's economy.

Key to changes that have been taken forward, is specificity for assessing landscape, townscape, and heritage.

- 4.7. Natural England made recommendations to embed the Local Nature Recovery Strategy directly into the IIA, to ensure statutory alignment and strengthen ecological connectivity across London. Comments also highlighted a notable absence of the preservation of existing access to recreational assets, and wording has been added in response. Additionally, for biodiversity and ecosystem services, an emphasis on landscape-scale habitat connectivity was advised, and objectives were revised to reflect their importance.
- 4.8. Feedback from the Environment Agency recommended including references to key frameworks and supporting evidence. These additions have now been incorporated. Revisions were also made in response to further emphasis on promoting a circular economy and creating opportunities for waste and material management, as well as proposing additional questions regarding flood defence maintenance and management measures to mitigate future flood risks.
- 4.9. The full IIA will be published alongside the draft London Plan as part of the statutory consultation over summer 2026. This will provide an opportunity for stakeholders and the public to comment on the assessment. It will also form part of the documentation submitted to the Secretary of State ahead of the Examination in Public.

Conflicts of interest

- 4.10. No one involved in the drafting or clearance of this form, or the preparation of the IIA, has any conflict of interest that might arise as a result of the assessments.

5. Financial comments

- 5.1. Approval is requested to spend £24,950 for technical support and advice from Land Use Consultants, with a further contingency of up to £15,000 if additional work is required.
- 5.2. The funding will come from the London Plan budget line in the draft 2026-27 budget. All expenditure will take place in 2026-27.
- 5.3. All appropriate budget adjustments will be made.

6. Legal comments

- 6.1. The Mayor's statutory plan-making powers are set out in Part VIII of the Greater London Authority Act 1999 (the Act). Section 334 of the Act requires the Mayor to prepare and publish the London Plan and section 341(1)(b) provides that the Mayor can prepare and publish a new London Plan at any time.
- 6.2. An IIA is a comprehensive assessment of the draft London Plan examining the likely impacts of the proposed policies against legal requirements under the Act. This includes the general duties the Mayor has in respect of all of his strategies under section 41 of the Act together with obligations specific to the London Plan in Part VIII.
- 6.3. In revising or replacing the London Plan, the Mayor shall have regard to the effect that it will have on various themes (health, health inequalities, sustainable development and climate change) as well as on the need to ensure consistency with national policies, the UK's EU obligations and such other

international obligations the Mayor is notified of by the Secretary of State. The Mayor is also required to have regard to the resources available to implement the London Plan and the principal purposes of the Greater London Authority as set out in section 30 of the Act:

- promoting economic development and wealth creation in Greater London
- promoting social development in Greater London
- promoting the improvement of the environment in Greater London.

6.4. The IIA will also examine the likely impacts of the proposed policies against legal requirements regarding Sustainability Appraisal, the Crime and Disorder Act, the Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) which implements Article 6(3) of the Habitats Directive (92/43/EEC).

6.5. The Mayor also has a subsidiary power pursuant to Section 34 of the Act which gives him the authority to do anything which is calculated to facilitate or, is conducive or incidental to the exercise of any of the statutory functions of the Authority. The decision to procure specialist consultancy services to undertake the IIA may reasonably be regarded as facilitating, being conducive or incidental to, the exercise of the Mayor’s Part VIII powers within the Act.

1.1. In taking the decision requested, the Assistant Director must have due regard to the Public Sector Equality Duty. To this end, they should have particular regard to section 3 of this report.

7. Planned delivery approach and next steps

7.1. The decision to formalise spend is being taken after the start of the project, due to the pressing need for immediate progress and delivery of a statutory requirement that underpins the London Plan drafting process. The wider programme could not accommodate delays associated with the IIA exercise. In addition, the spending decision needed to be informed by a parallel workstream that is progressing concurrently and had potential dependencies on this commission. These dependencies have now been confirmed, and their evolving requirements are reflected in the final expenditure.

7.2. The exact timing of the work will depend on any ongoing edits to policy and the complexity of undertaking the assessments. The broad timeframe is as follows:

Activity	Timeline
(Officer) appraisals and consultant review	April 2026
Final report and project closure	May 2026

Appendices and supporting papers:

None

Public access to information

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

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

Strategic Programmes

Does this decision seek approval for activity falling within the remit of a programme delivery plan? YES

If YES, which programme does this fall within: Making Best Use of Land

Part 1 – Deferral

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

Part 2 – Sensitive information

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

Is there a part 2 form? NO

ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

Drafting officer:

Marissa Ryan-Hernandez has drafted this report in accordance with GLA procedures and confirms the following:

✓

Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 5 May 2026.

ASSISTANT DIRECTOR, FINANCIAL SERVICES:

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

Date 5 May 2026

Signature

Peter Sebastian